| LONDON BOROUGH OF ENFIELD | Date : 3 November 2020 |  |
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| PLANNING COMMITTEE | Contact Officer: <br> Andy Higham: 02081320711 <br> David Gittens: 02081320870 | Ward: <br> Renfield Highway <br> Head of Planning <br> Application No: 20/01526/FUL |

LOCATION: 241 Green Street, Enfield, EN3 7SJ

PROPOSAL: Redevelopment of site involving demolition of the existing buildings and erection of a mixed-use development ranging from 2 storeys to 16 storeys comprising 148 residential units in three blocks, together with commercial floorspace (classes A1, A2, A3, B1, D1 and D2) at part ground / first floor levels together with substation, car parking, cycle parking, amenity areas, landscaping and associated works.

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| Applicant Name \& Address: <br> Stonegate Homes Ltd <br> c/o Agent | Agent Name \& Address: <br> Gill Eaton, Iceni Projects |
|  | Da Vinci House <br> 44 Saffron Hill <br>  <br>  <br>  <br>  <br>  <br>  <br> ECondon <br> EC1N 8FH |

## RECOMMENDATION:

Notwithstanding any direction from the Mayor of London to the contrary, that planning permission be GRANTED, subject to conditions and a S106 legal agreement

Ref: 20/01526/FUL LOCATION: 241 Green Street, Enfield, EN3 7SJ,


## 1. Note for Members

1.1 This planning application is categorised as a "major" planning application and in accordance with the scheme of delegation, is reported to Planning Committee for determination.

## 2. Recommendation / Conditions

2.1 That the Planning Committee is requested to grant planning permission for:

Redevelopment of site of 241 Green Street involving demolition of the existing buildings and erection of a mixed-use development ranging from 2 storeys to 16 storeys comprising 148 residential units in three blocks, together with commercial floorspace (classes A1, A2, A3, B1, D1 and D2) at part ground / first floor levels together with substation, car parking, cycle parking, amenity areas, landscaping and associated works, subject to:

A Referral of the scheme to the Mayor for London (Stage 2);
B The satisfactory completion of a S106 planning obligations agreement to secure the matters covered in this report; and,
C The recommended conditions set out below
2.2 That delegated authority be granted to the Head of Development Management finalise the wording of the s106 obligations and the conditions as set out below:

## Conditions

Development to be begun within 3 years
Development to be in accordance with approved plans
Details of external materials - sample brick panels on site
Details of II roofs and accessible decks
SURFACING MATERIALS
CONTAMINATION - REMEDIATION STRATEGY
Noise attenuation between all commercial units and residential above
Noise attenuation and ventilation - details of window specifications and mechanical ventilation arrangements.
Opening hours of commercial units- Blocks A, B \& C - 07.00 to 21.00
(Monday to Saturday) and 08.00 to 21.00 (Sundays and Public Holidays)
Fixed mechanical plant and any associated screening - LBE standard condition
Ventilation/extraction details - commercial units - Blocks A, B \& C.
BREEAM accreditation (Excellent)for non-residential space in Blocks A, B \& C.

Accessible housing - (\%age) of dwellings to be built as 'wheelchair user' (M4(3)), with all others being 'accessible \& adaptable' (M4(2)
Submission of Fire Strategy
Details of landscaping, public realm, play space and equipment, private amenity space
Details of biodiversity enhancement measures (including bat boxes, bird boxes \& 'insect hotels'), boundary treatments \& wind mitigation measures
Provision of cycle parking spaces as set out in approved plans
Provision of car parking spaces as set out in Transport Assessment/approved plans
Car Parking Management Plan
Delivery \& Servicing Plan
Secured by Design
Elevation details 1:20
Signage strategy for commercial units

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SuDS details
No plumbing or pipes
Construction Environmental Management Plan (PRECOMMENCEMENT)
Non-Road Mobile Machinery (PRE-COMMENCEMENT)
Acoustic report
Construction Logistics Plan (including delivery times)
(PRECOMMENCEMENT)
Site Waste Management Plan (PRE-COMMENCEMENT
Thames Water
IMPACT PILING RESTRICTION
THAMES WATER - NETWORK PRESSURE
CLEARANCE OUTSIDE OF BIRD NESTING SEASON
DEVELOPMENT TO ACCORD WITH BAT SURVEY RECOMMENDATIONS
DETAILS OF ECOLOGICAL ENHANCEMENTS
TREE/ LANDSCAPING CONDITION/S
SUBMISSION OF ENERGY PERFORMANCE CERTIFICATE
SUBMISSION OF BREEAM RATING VERIFICATION
EXTERNAL LIGHTING PLAN
FIRE STRATEGY - IN CONSULTATION WITH FIRE COMMISSIONER
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## 3. Executive Summary

3.1 This application follows a previous application by the same applicant for the redevelopment of this site to provide 175 residential units and 556 square metres of commercial floor space.
3.2 Following significant concerns that were expressed by the Council with regard to the design and composition of the scheme, including the loss of employment floorspace, it was withdrawn by the applicants in September 2019. following concerns expressed by the planning officers at Enfield which primarily related to the design and massing of the scheme, its layout and the creation of a poor residential environment.
3.3 The applicants have subsequently appointed a new design team who have taken a different approach to the redevelopment of the scheme, which, as a result has increased significantly the employment floor space and has made it taller, but in the process has reduced the bulk of the scheme and allowing more light into the site. The scheme now rises from between 2 to 16 storeys in height.
3.4 The scheme has been subject of extensive pre-application discussion and design review, throughout which, overall, the design team has responded positively and the scheme is now considered to constitute a high quality form of architecture in itself that will be regenerative and transformational in its impact on the locality in its own right.
3.5 The scheme now seeks to provide 148 residential units (of which $50 \%$ by residential unit and habitable room, would be affordable) and 1,144.5.
3.6 The scheme therefore demonstrates the qualities of good growth and, together with the aspirations for Crossrail 2, has the potential to act as a catalyst for wider regeneration of the Brimsdown Station area, in accordance with the aims and objectives of the North East Enfield Action Plan.
3.7 Accordingly, in view of the above, officers support the scheme.

## 4. Site and Surroundings

4.1 The subject site is located within the Enfield Highway Ward located approximately 2 miles east of Enfield Town Centre. It is an irregularly shaped site that measures approximately 4600 square metres, located on the eastern side of the junction of Green Street and Enstone Road, just south of Brimsdown Railway Station. Brimsdown Station offers access to rail services on the West Anglia main line. The site is bounded to the east by railway tracks, beyond which lies a large swathe of land designated as Strategic Industrial Land.
4.2 To the north east the site is bound by a 3 storey residential block (that also backs onto the railway) and to the immediate north a 2 storey block that fronts Green Street, comprising of commercial uses at ground floor with a mixture of other uses above.
4.3 To the immediate west of the site lies the Green Street bus stand which is the terminus for buses serving the 191 and 307 bus routes. Beyond Green Street bus stand, and across Green Street to the north west, lies a traditional pattern of 1930's, 2 storey predominately semi detached houses set behind reasonably generous front gardens.
4.4 To the south and south west of the site lies a series of homogenous 3 and 4 storey flatted blocks of late $20^{\text {th }}$ Century construction with off street parking set to the sides and/or rear. These blocks are characterised by their generous setbacks from the back edge of pavement in a manner commensurate with the front garden depths of the 1930's houses nearby.
4.5 The railway acts as an significant dividing line between the residential developments on its western side and the industrial land to the east, Indeed the application site is the last site in the near vicinity on the western side of the railway in large scale employment use.
4.6 The southern part of the site is located in Flood Zone 1 (land assessed as having the least annual probability of flooding) whilst the northern part of the site is located within Flood Zone 2. Aside from this the site has no other specific designation within the Enfield Development Management Document 2014 although there railway is a designated wildlife corridor.
4.7 There are no statutorily or non-statutorily listed buildings on or near the site and the site does not lies within or in close proximity to a conservation area.
4.8 The site is accessed via metal gates onto Green Street and Enstone Road and presently contains two large warehouse-type buildings with 3,318 square metres of floor space with associated surface car parking. The site was most recently occupied by a company named Ripmax. The Council is advised that Ripmax vacated the site as the accommodation no longer suited their business requirements; it failed meet the required floor to ceiling levels and was too large for their ongoing operation.

## 5. Proposal

5.1 The current iteration of the proposals submitted for consideration involves the demolition of all buildings on the site to provide a mixed use scheme with 148flats, divided into three blocks comprising principally commercial floorspace at ground and first floor levels (Blocks A, B and C), together with ground and first floor level car parking and publicly and privately accessible landscaped areas.
5.2 Block A would be located on the site frontage to Green Street forming a continuation of the commercial façade to the immediate north, at the western edge of the site. This would take the form of a part 4 part 5 storey building incorporating commercial floorspace at ground floor levels and containing 19 flats ( $6 \times 1$ bed, $10 \times 2$ bed and $3 \times 3$ bed).
5.3 Block B would be located at the north east corner of the site backing onto Brimsdown Station, and would be a part 8, part 16 storey building. Block $B$ would contain 73 flats ( $26 \times 1$ bed, $35 \times 2$ bed and $12 \times 3$ bed).
5.4 Block C would also back onto the railway and would rise to a part 10, and part 12 storeys. There would be a two storey projection to the front of Block C, fronting Enstone Road that would incorporate commercial floorspace. Blocks $B$ and $C$ would also be connected to each other by a 2 storey podium that would principally contain car parking at ground and first floor levels accessed by a road along the southern boundary of the site. Block $C$ would contain 56 flats ( $22 \times 1$ bed, $26 \times 2$ bed and $8 \times 3$ bed).
5.5 The three buildings would be arranged around a courtyard to the centre of the site, with both soft and hard landscaping elements incorporating extensive planting and permeable paving.
5.6 The current scheme constitutes a revision to the originally submitted proposals following concerns expressed by officers that the development proposal was too large in scale. In response to officer's requests, a single storey was removed from Block A (down from 6 storeys to 5 storeys) and two storeys were removed from Block C (down from 14 storeys to 12 storeys). This revision also saw the unit numbers reduce from 154 flats down to 148 flats and the commercial floorspace reduce to 1144.5 square metres.

### 6.0 Planning History

6.1 The most significant planning history associated with this case relates to a previous scheme from the same applicant, that proposed a significantly different design approach, that sought to provide some 175 flats on the site.
6.2 This application was withdrawn by the applicant in September 2019.

| Decision <br> date | REF | PROPOSAL | Decision |
| :--- | :--- | :--- | :--- |
| $12 / 09 / 2019$ | $18 / 04935 /$ FUL | Redevelopment of site involving <br> demolition of existing buildings and <br> erection of 175 self-contained units <br> (comprising 53 x 1 bed, 104 x 2 bed <br> and $18 \times 3$ bed) with flexible mixed use <br> on the ground floor (A 1, A2, A3, B1 <br> D1) within 2 blocks comprising (Block <br> A, B and D up to 10 storey's and Block <br> C up to 7 storey's) together with <br> undercroft parking and associated <br> landscaping and parking. | Application <br> Withdrawn |
| $26 / 01 / 1979$ | TP/78/1435 | CAR PARK | Granted With <br> Conditions |
| $26 / 10 / 1978$ | TP/78/1280 | LIFT HOUSING | Granted With <br> Conditions |
| $03 / 12 / 1971$ | TP/71/1247 | USE AS WAREHOUSE | Granted With <br> Conditions |


| $14 / 11 / 1966$ | ENFIELD_III718 | FACTORY | Approved |
| :--- | :--- | :--- | :--- |
| $13 / 01 / 1964$ | ENFIELD_II/662 | SINGLE STOREY FACTORY | Granted With <br> Conditions |

## 7. Consultation

Statutory and Non-Statutory Consultees

## Internal

### 7.1 Housing and Regeneration

- This scheme of 148 residential has an affordable housing component which is $50 \%$ by habitable room and $48 \%$ by unit numbers. This matches the Enfield Plan affordable housing maximum target and meets the London plan affordable housing requirements for development on industrial land.
- The Affordable housing tenure mix is 70\% London Affordable Rent (LAR) and 30\% Intermediate Market Rent (IMR) which exceeds the Enfield Plan requirement for LAR and meets the London Plan requirement. The affordable housing offer is strongly supported by the housing department
- The greater number of larger family units in the affordable mix is strongly supported, as this meets the need of those on the Enfield Housing Register to the largest degree.
- The Housing department would prefer a larger component of three bedroom plus units but recognises the design and viability constraints that set the parameters for taller flatted housing developments.
- The unit sizes for the affordable units are within London Housing Design Guide requirements and often exceed these requirements.
- The Housing Department would prefer that the affordable units in Block B are allocated between LAR and IMR with each being on separate floors.
- The Housing department believe that the location of these affordable units close to an area with a high number of existing employment opportunities may enhance the ability of social tenants to access paid employment which will make their tenancies more sustainable.
7.2 Traffic and Transportation:

No objections subject to conditions and S106 to secure highways impact mitigation measures.
7.3 Environmental Health Officer: No objections to the application as there is unlikely to be a negative environmental impact. In particular there are no concerns regarding air quality. Request conditions to:

- secure details of acoustic properties of proposed plant for approval to ensure noise from future items of plant;
- secure the implementation of the contamination remediation strategy written by WOE Consulting; and,
- secure low emissions standards for construction machinery.
7.4 SUDs Officer:

Position will be updated.

## External

### 7.5 Greater London Authority

- Strongly support the principle of this residential led mixed use nondesignated industrial site, the proposed height and the $50 \%$ of affordable housing by habitable room that it would deliver, subject to:
- Securing the affordable housing, the wheelchair units, highways impact mitigation measures and contribution to the Council's carbon offset fund by s106 legal agreement;
- Ensuring that the residential use does not fetter the future vitality of the adjacent Strategic Industrial Land;
- Request further information in respect of urban greening and flood risk:


### 7.6 Transport for London

To comply with the Intend to Publish London Plan, condition or s106 obligations are required in order to secure highways impact mitigation measures,

### 7.7 Environment Agency

Raise no objection. Recognise Flood Zone 2 designation but recommend applicant refer to Flood Risk Standing Advice.
Recommend procedures to avoid contamination of groundwater.

### 7.8 Thames Water:

Raise no objection to the development with regard to foul water and surface water. Request conditions to:

- Secure a Source Protection Strategy from the developer in order to safeguard groundwater quality;
- Ensure that no construction/piling takes place within close proximity to nearby strategic water main or other underground water assets.
- Secure water supply upgrades to serve the development
7.9 Designing Out Crime Officer:

Requests a condition that the development secures a Certificate of Compliance to the relevant Secure by Design Guide(s) or achieves Crime Prevention Standards in conjunction with the Metropolitan Police.

## Public

7.10 Consultation letters dated 29 June 2020 were sent to 621 neighbouring and nearby occupiers (expiring 23.July.2020). Site notices were displayed in the local area from 21 July 2020 (expiring 11 August 2020) and a public notice was displayed in the local press (Enfield Independent) from 08 July 2020 (expiring on 22 July 2020).
7.11 In total 6 responses were received from local residents at the time of writing this report from addresses in Brimsdown Avenue (1 letter), Green Street (2 letters), Goldsdown Road (1 letter), Osborne Road (1 letter), Westfield Close (1 letter) all raising objections to the proposal.
7.12 In summary, the following objections have been raised:

- Affect local ecology
- Close to adjoining properties
- Conflict with local plan
- General dislike of proposal
- Inadequate access
- Increase danger of flooding
- Information missing from plans
- Loss of light
- Loss of privacy
- More open space needed on development
- Noise nuisance
- Not enough info given on application
- Over development
- Potentially contaminated land
- Brimsdown almost grinds to a halt most days due to too many people within the area. The Doctors surgeries are full and practically impossible to get an appointment as are the dentists.
- There is not enough parking provided with significantly fewer parking spaces provided than housing.
- The commercial units and the flats in this development will increase the traffic and noise pollution on the surrounding residential roads which do not have permit parking, therefore there will be a risk in the increase of cars that will be parked and will restrict residents from finding a parking space on their road.
- Ideally you wish people to use public transport but in reality most homes have at least one car as well as using some public transport meaning these cars will spill out onto already overcrowded on surrounding residential roads that do not have permit parking.
- 148 residential units is a huge number which will create more traffic on the Green Street, sometimes we have to wait 10-20 min just to leave my driveway because the road is blocked by cars waiting to cross the train line at Brimsdown Train Station to Mollison Avenue.
- What will happen to the small bus station on Green Street? Many commuters and residents use that bus stop for their daily travel yet there is no mention of how that is going to be impacted.
- There is a school on Green Street that will also be affected by the increase of cars passing on the road and this can be dangerous during start and end of school time.
- Increasing the population in Brimsdown must be supported by significant improvement to local transport links. The train service at Brimsdown is shockingly poor, with packed trains, trains frequently cancelled and often already there is not enough space on a train to get on with an hour wait for the next train. Housing developments such as this one must be supported by significant infrastructure developments at Brimsdown.
- The sky line will be affected by the height of this development. Around Brimsdown Station there isn't any higher building than 3 levels so we object to this high development that will totally change the character of the area.
- High buildings like this should be surrounded by much bigger open green landscape.
- Our children have asthma and we are already in a polluted street, the development would only bring more pollution.
- The building is very tall, so we would lose privacy regarding our local garden.
- The timing is ridiculous, as many people cannot go online or to local library to comment or research on the development.
- This development is far too high especially for the local area as there is nothing approaching this height nearby, even the flats at the end of alma road quite some way away and the only thing any were in this area of Enfield like it have been reduced in height for the sake of quality of life.
- Public transport is already dangerously overcrowded especially at peak times trains at Brimsdown Station are packed and buses stopping outside the development are standing room only. Even if more buses are laid on, that would result in more pollution on a residential street.
- Deliveries and other day to day activities will bring more congestion and pollution to this area as well, not to mention the noise and air
pollution a construction project of this size will bring as it is being developed.
- There is concern at the potential land and water pollution from digging over a former industrial plot that could be released into local ground water and poison our land.
- Local shops are already overcrowded and will be even more so.


## 8. Relevant Planning Policies

### 8.1 National and Regional Policies

National Planning Policy Framework (NPPF) 2019
National Planning Practice Guidance (NPPG)

### 8.2 London Plan (2016)

The London Plan 2016 is the Mayor of London's spatial strategy for London. The following policies are relevant to this case:

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 3.13: 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 4.1: Developing London's economy
Policy 4.4: Managing Industrial Land and Premises
Policy 5.1: Climate change mitigation
Policy 5.2: Minimising carbon dioxide emissions
Policy 5.3: Sustainable design and construction
Policy 5.7: Renewable energy
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

## The London Plan - Intend to Publish (December 2019)

8.3 The Examination in Public of the draft London Plan took place in the Spring of 2019. The Panel of Inspectors' report and recommendations to the Mayor was issued in October 2019. The Mayor subsequently issued his Intend to Publish London Plan in December 2019.
8.4 In March 2020, the Secretary of State issued Directions to change a number of policies. Whilst the London Plan 2016 is still the adopted Development Plan for Enfield, the advanced stage that the Intend to Publish version has reached means that it is a material consideration in the determination of planning applications and will continue to gain more weight through the final stages of the examination process. The relevant, unchallenged policies of the Intend to Publish London Plan are as follows:

GG1 Building Strong and Inclusive Communities
GG2 Making the Best Use of Land
GG3 Creating a Healthy City
D2 Infrastructure Requirements for Sustainable Densities
D3 Optimising Site Capacity Through Design Led Approah
D4 Delivering good Design
D5 Inclusive Design
D6 Housing Quality and Standards
D7 Accessible Housing
D8 Public realm
D9 Tall buildings
D11 Safety, security and resilience to emergency
D12 Fire Safety
D14 Noise
S1 Delivering London's Social Infrastructure
S3 Education and childcare Facilities
S4 Play and informal recreation
G5 Urban greening
G6 Biodiversity and access to nature
G7 Trees and woodlands
GG1 Building Strong and Inclusive Communities
GG2 Making the Best Use of Land
GG3 Creating a Healthy City
GG4 Delivering the Homes Londoners Need
H4 Delivering affordable housing
SI1 Improving air quality
SI2 Minimising greenhouse gas emissions
SI3 Energy Infrastructure
SI5 Water Infrastructure
SI7 Reducing Waste
SI12 Flood Risk Management
SI13 Sustainable Drainage
T1 Strategic approach to transport
T2 Healthy Streets

        Assessing and Mitigating transport Impacts
        Cycling
    T6 Car Parking
T7 Deliveries, servicing and construction
T9 Funding Transport Infrastructure through planning
DF1 Delivery of the plan and planning obligations

### 8.5 Enfield Core Strategy (2010)

CP1 Strategic growth areas
CP2 Housing supply and locations for new homes
CP3 Affordable housing
CP4 Housing quality
CP5 Housing types
CP6 Housing need
CP8 Education
CP9 Supporting Community Cohesion
CP20 Sustainable Energy use and energy infrastructure
CP21 Delivering sustainable water supply, drainage, sewerage infrastructure
CP24 The road network
CP25 Pedestrians and cyclists
CP26 Public transport
CP28 Managing flood risk through development
CP29 Flood management infrastructure
CP30 Maintaining and improving the quality of the built and open
environment
CP31 Built and landscape heritage
CP32 Pollution
CP34 Parks, playing fields and other open spaces
CP36 Biodiversity

### 8.6 Enfield Development Management Document (2014)

DMD1: Affordable Housing on Sites Capable 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 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
DMD53: Low and Zero Carbon Technology
DMD55: Use of Roofspace/ Vertical Surfaces
DMD57: Responsibly Sourcing Materials, Waste Minimisation, 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

## 9. Analysis

9.1 This application is considered in the context of national, London wide and local planning policies referred to in the preceding section of the report, and in relation to the representations received as a result of the consultation process. This section of the report provides an analysis of the specific aspects of the proposed development and the principal issues that need to be considered in the determination of the planning application. The principal issues that are addressed in relation to this scheme are:-

Land use - Principle of proposed uses
Housing Need/Affordability
Tall Buildings
Design
Amenity Impacts
Transport
Landscaping

Land use
9.2 The application site constitutes a non designated employment site located within the Upper Lea valley Opportunity Area. An area defined by the London Plan 2016 as being capable of supporting over 20,000 new homes and an indicative employmenyt capacity of 15,000 new jobs. The Mayor's Intend to Publish London Plan identifies the Opportunity Area as being capable of providing a minimum of 21,000 new homes and 13,000 new jobs. London Plan Policy 2.13 seeks developments in opportunity areas to optimise development outputs and densities, provide necessary social and other infrastructure to sustain growth.
9.3 London Plan Policy 3.3 stresses the need to realise brownfield housing capacity whilst the Intend to Publish London Plan Policy H1 calls for housing intensification on appropriate low density sites in commercial use.
9.4 London Plan Policy 4.4 requires boroughs to adopt a rigorous approach to industrial land management to ensure sufficient industrial land is available to meet current and future demand. Policy 4.4 also advocates the release of surplus industrial land so that it can contribute to strategic and local planning objectives, especially to provide more housing. This is further reflected in Policies E4 and E7 of the Mayor's Intend to Publish London Plan which seeks
a plan-led approach to the release of industrial land. Policy E7.C resists the loss of non-designated industrial sites, unless:
(1) it has been demonstrated that there is no reasonable prospect of the site being used for the industrial and related purposes;
(2) the site has been allocated in an adopted Local Development Plan Document for residential or mixed-use development; or
(3) industrial, storage or distribution floorspace is provided as part of mixeduse intensification.
9.5 There is no site allocation relating to this site, and it is not proposed to replace like for like industrial floorspace as part of the proposed development. The total existing floor area is 3318 square metres in B8 use and the development proposes to re-provide flexible commercial floorspace of 1144.5 sqm (A1, A2, A3, B1, D1, D2). This will lead to a net loss of employment generating floorspace.
9.6 To respond to this aspect of employment policy the applicant commissioned an Industrial Market Summary Report by Lambert Smith Hampton which concluded amongst other things, that:

- The property was owner occupied by Ripmax Ltd since 1972 and had become unviable for long term use to the business given their requirement for significantly more warehouse/storage room and less office space;
- The low eaves and mezzanine heights also made the space not well suited to their long-term use and that significant capital expenditure would be required to bring it up to the required standard;
- The long-term prospects of the site are limited by a number of physical constraints, reducing its suitability as an employment site. It is outside the Brimsdown Industrial Estate (the SIL) and the railway forms a clear boundary between the two;
- The access of the site from the major road network is constrained and difficult, particularly for larger vehicles. (From the East, the height is restricted on Green Street as it crosses the railway. From the North, weight restrictions apply, from the South and East HGVs would need to negotiate the congested roads and residential areas.)
- HGV access is restricted by large amounts of on street parking; by the level crossing on Green Street and by the nearby Brimsdown Primary School;
- Interest from B8 occupiers is therefore restricted; the site is also less attractive to B 2 operators given the surrounding residential properties and mainly residential character of the area (which would also lead to concerns that there would be restrictions on hours of operation and such like, further deterring modern occupiers);
- The review demonstrates that there is a significant supply to serve existing and future industrial requirements in the Enfield area and that the availability of Grade A space further lessens demand for second hand units with physical constraints such as this site.
9.7 It can also be reasonably argued that a mixed use residential/industrial scheme on the site could render many of the existing constraints upon future industrial occupiers.
9.8 Whilst the application offers no detail on the number of jobs proposed or the number of jobs which could previously have been accommodated on site, or the employment density that could be achieved on site, it is known that B8 (warehouse/storage) uses are notoriously low density employment activities.
9.9 With the presence of large amounts of designated Strategic Industrial Land in close proximity, it would be reasonable to assume that there would be far
more specialist attractive sites available for industrial/warehouse uses to locate than the application site, within premises that were not so constrained.
9.10 When viewed in the context of the reuse of a brownfield site and the level of intensity proposed for the redeveloped site which would still retain some modern flexible commercial floorspace, the loss of this non-designated industrial site can be reasonably considered in these circumstances.
9.11 Once the loss is considered acceptable, in accordance with policy DMD22, mitigation/compensation for the loss of employment floorspace should be provided in accordance with the Council's S106 SPD.


## Housing Need and Affordability

9.12 The need for affordable housing remains high in the borough, which is evidenced in the draft Enfield Strategic Housing Market Assessment (SHMA) (2015).
9.13 London Plan Policy 3.3 and Policy H1 of the Mayor's Intend to Publish London Plan, seek to increase the supply of housing in London by setting borough housing targets. Table 3.1 in the London Plan puts the minimum annual monitoring target for the London Borough of Enfield at 798 additional homes per year between 2015 and 2025. Under Policy H1 of the Mayor's Intend to Publish London Plan, an increased target of 12,460 is set for the period 2019/20 to 2028/29.
9.14 London Plan 2016 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.
9.15 The Intend to Publish London Plan Policy H5 and the Mayor's Affordable Housing and Viability SPG set a strategic target of $50 \%$ affordable housing for former industrial sites. The 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, critically, it means that these applications need not be accompanied by a financial viability assessment.
9.16 Enfield Core Strategy Policy CP 3 and Enfield Development Management Document Policy DMD1 require 40\% of units as affordable housing on all sites capable of accommodating 10 or more dwellings, and a housing tenure mix of $70 \%$ Social Rented and $30 \%$ Intermediate provision.
9.17 The proposed scheme would deliver 148 new residential units, which would contribute positively to the Council's housing targets and in this context is strongly supported.

| Housing Mix |  |
| :--- | :--- |
| Unit size | No of units (\%) |
| 1Bed 2Person | 54 units (36.5\%) |
| 2Bed 3Person | 11 units (7.5\%) |
| 2Bed 4Person | 60 units (40.5\%) |
| 3Bed 5Person | 23 units (15.5\%) |
| Total | 148units (100\%) |

9.18 Whilst the dwelling size mix deviates from the borough-wide targets it is not necessarily expected that all housing schemes would meet the full range of housing requirements in their mix as site specific characteristics may reasonably demand or warrant such a deviation.
9.19 Policy DMD3 recognises there may be instances where it is not feasible or desirable to achieve the targets, such as where there is an unsuitable external environment for children and where there are more limited opportunities for amenity space, in combination with a site context which would lend itself to a higher density development, where the delivery of family housing may be more limited.
9.20 The split between affordable housing and market housing would be split 73:75 in units, although this would be 50:50 in habitable rooms. Within the 73 affordable units, the mix would be as follows:

| Affordable Mix |  |  |  |
| :--- | :--- | :--- | :--- |
| Unit size | Intermediate Mkt Rnt | Affordable Rent | Overall |
| • 1Bed 2Person - | 15 units (55.6\%) | 11 units (29.3\%) | 26 units (35.5\%) |
| - 2Bed 3Person - | 04 units (14.8\%) | 01 units (02.2\%) | 05 units (07\%) |
| - 2Bed 4Person - | 08 units (29.6\%) | 22 units (47.8\%) | 30 units (41\%) |
| - 3Bed 5Person - |  | 12 units (26.1\%) | 12 units (16.5\%) |
| Totals | 27 units (100\%) | 46 units (100\%) | 73 units (100\%) |

9.21 The greater number of larger family units being apportioned within the affordable mix is strongly supported, as this meets the need of those on the Enfield Housing Register to the largest degree.
9.22 The Housing department would prefer a larger component of three bedroom plus units but recognises the design and viability constraints that set the parameters for taller flatted housing developments.
9.23 The unit sizes for the affordable units are within London Housing Design Guide requirements and often exceed these requirements.
9.24 The Housing Department would prefer that the affordable units in Block B are allocated between London Affordable Rent and Intermediate Market Rent with each being on separate floors.
9.25 The Housing department believe that the location of these affordable units close to an area with a high number of existing employment opportunities may enhance the ability of social tenants to access paid employment which will make their tenancies more sustainable.
9.26 It is recognised the redevelopment of the site can help delivery and contribute to the Council's substantial housing delivery targets and the affordable housing proportion and dwelling size mix are considered to be acceptable.

Tall Buildings
9.27 London Plan 2016 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.
9.28 The 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.
9.29 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."
9.30 Given the low-rise nature of the immediately surrounding area and the definition in the Local Plan, at 12 and 16 storeys, the two proposed buildings that would back onto the railway can be considered as 'tall'.
9.31 The acceptability of tall buildings is considered against the 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.
9.32 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.
9.33 Whilst the site is not explicitly identified in the Local Plan as a location that is appropriate for tall buildings, however, this does not necessarily make the location inappropriate. The site is free from immediate constraints as set out under 1a and 1b of DMD43, and is therefore not an 'inappropriate location', as defined by DMD Policy.
9.34 Transport network capacity. The ability of the public transport network to accommodate high-density development is also key to the acceptance of taller buildings. Whilst this site presently has a low PTAL score it does lie adjacent to a site that TfL has reminded the Council if safeguarded as a future work site for the Crrossrail 2 project.
9.35 It is considered that infrastructure investment of this order at Brimsdown Station would significantly enhance the area's capability for accommodating a cluster of tall buildings.
9.36 Spatial Hierachy. The site meets or partially meets one of the criteria from Policy DMD 43 Part 3 as $t$ is located within the regeneration area of 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, the London Plan 2016 Policy 2.14 and the Intend to Publish London Plan Policy SD10.
9.37 Part 3 of Policy DMD 43 states that in the majority of cases sites meeting more than one of the criteria can be considered an appropriate location. Part 4 of DMD 43 then goes on to list 8 essential criteria that tall buildings must meet. Development must:
a. Provide a landmark signifying a civic function or location/area of importance and interest and/or add to the legibility of the area;
b. Provide adequate amenity space for all residential units;
c. Not have a negative impact on existing important and highly visible structures (including other tall buildings);
d. Take account of the cumulative impact of tall buildings (including consideration of extant permissions);
e. Exhibit high standards of sustainable design and construction and architectural quality, the latter to include consideration of scale, form, massing, proportion and silhouette, facing materials, night-time appearance and relationship to other structures with particular attention to the design of the base and top of the building;
f. Contribute to the physical and visual permeability of the site and wider area, aiding legibility and movement;
g. Contribute positively to the public realm through the relationship to the surrounding environment and, where appropriate, through the provision of high quality public space;
h. Not harm the amenity of properties in the vicinity through shadowing and overlooking
9.38 It is considered that the proposed tall buildings would meet all of these criteria.
9.39 Views and Heritage Assets. The site appears to be within a 'sensitive location', as defined by DMD Policy 43 Part 2, as it lies just within the northern extent of View 9 (approach to Enfield Town). However, this does not mean necessarily that the proposed buildings are inappropriate; rather that careful consideration of possible harm to these views is required.
9.40 There are no significant heritage assets in close proximity to the site. However, the Council's Conservation and Heritage Officer is concerned that tall buildings in this location may have the potential to impact on long range views and the setting of heritage assets in the wider area.
9.41 The submitted Townscape and Visual Impact assessment is helpful and clearly shows an impact on the setting of Durants Park, in addition to Brimsdown Railway Station and the former Station Tavern, Green Street. This has been given preliminary consideration by the Council's Conservation and Heritage Officer as amounting to less than substantial harm, albeit to non-designated heritage assets. An update should be available for Members at or before the committee meeting.
9.42 Related to this, Chapter 8 of the submitted Townscape, Heritage and Visual Impact Assessment (TVIA) assesses the effect of the proposed scheme on the setting of local Heritage Assets and from a number of verified views that have been agreed with officers.
9.43 The TVIA concludes that the proposed scheme, as a whole, works well as a pair of towers with a distinct architectural style, character and identity. In no
case does the document find the impact of the proposed buildings harmful. This position is agreed by officers.

Architectural Quality and Design
9.44 In relation to the design, mass, height and density, the proposal has been completely redesigned from the previously withdrawn scheme. The proposals put forward a new approach which has been led by the daylight and sunlight considerations and to make more intensive use of a previously-used site adjacent to Brimsdown train station.
9.45 It is recognised that the quality redevelopment of this site has the potential to not only improve the built environment of Brimsdown, but also has the potential to be a catalyst for the wider regeneration of many of the low density, urban previously-developed sites in the area.
9.46 However, regardless of the potential to be considered as a component piece of a number of nearby redevelopment sites, first and foremost, any proposal for the redevelopment of this site must work appropriately in its existing surrounding context.
9.47 The scheme is based around three buildings ranging from 2 to 16 storeys with these three buildings set around a central public space / amenity space.
9.48 Policy 7.7 of the London Plan 2016 and Intend to Publish London Plan Policy D9 and Enfield Policy DMD43 require the location and design of tall and large buildings to be particularly carefully considered.
9.49 The submitted Design and Access Statement sets out design and layout objectives, which can be summarised as follows:

- Car-free courtyard - for residents and community with residential entrances facing the courtyard and flexible commercial units located at the site entrances;
- Connecting public space - Courtyard opens up towards the bus terminus with the potential for further pedestrian route northwards toward the train station;
- Ensuring daylight and outlook - minimising negative impacts to the buildings on neighbouring sites;
- Maximising the sunlight penetration into the courtyard;
- Equal massing - designing the two towers with similar angular footprints to give them a distinctive shape;
- Active frontage-Making entrances visible by locating them on the corners of buildings
- Connecting roof terraces- Communal amenity space is located aboe the podium and is accessible to every tenure via a linking corridor.
- Aspect - all 3 blocks have been designed to maximise aspects from all apartments and to allow for cross ventilation. All internal communal circulation spaces are naturally lit.
9.50 The scheme has been designed with a part 4 part 5 storey frontage building that addresses the street scene to Green Street, and together with the two storey podium of Block C , introduces the overall design language with the two taller buildings set back against the railway.
9.51 This simple hierarchy means that the towers would not appear oppressive in the street scene as the eye would be drawn to the frontage building first.


## Layout

9.52 Effort has been made to look beyond the red line of the site and investigate what new connections could be made to the station and bus stop, as identified by the Enfield Design Panel of December 2019. The desire line along the route from the station to the site has improved with the introduction of an entrance for the commercial space.
9.53 The Design Panel was concerned that the ground floor layout did not maximise the amenity of the courtyard; because of the inactive frontage of the car park grill and podium block that backed onto the playground. This has been improved by moving the play space away from the podium wall and creating a landscaped area that improves its appearance.
9.54 The proposed development has an efficient core to unit ratio and proposed shared corridors provide light and ventilation. Both these approaches are strongly supported. The layout of apartments has worked hard to minimise the number of single aspect units from previous iterations, which is supported.
9.55 The potential of future car park adaptation into a commercial unit is demonstrated in the DAS and is supported. It shows the potential and is a positive approach to considering how internal car parking can be adapted once car dependency has reduced.

Scale (Height and Massing)
9.56 The Enfield Design Panel identified the opportunities for development of Brimsdown, referencing the potential offered by Crossrail 2 and the indicative masterplan. However, they stated that it must also be acceptable in its current context.
9.57 The Panel encouraged the relocation of the taller building to the northern side of the site which has been proposed in this application.
9.58 The height and massing of Block A fronting Green Street has been reduced during the life of this application by a storey and is now considerably improved in the way that it addresses Green Street. Now a 5 storey building overall, it presents with a 4 storey shoulder to Green Street as it faces the 2 storey houses opposite and now incorporates a single storey (as opposed to two storey) plinth of commercial floorspace.
9.59 The reduced height of Block A sits comfortably within the existing context and acts as the lower level foreground to the towers formed by Blocks B and C that will elevate from behind. The scale of Block A augurs well for the possible future context, as the redevelopment of this site as, should proposals come forward for nearby sites in the future, these would be likely to build on what becomes established on this site.
9.60 The transition from the two-storey element in the West of Building $C$ to the 5 storey Building A now provides a more fluid transition in the approach along Green Street, travelling East.
9.61 The reduction in height by 2 storeys of Building $C$ presents a greater transition in height between the two towers, a noticeable stagger and a change from the heavier building form originally submitted. This impacts positively on how the development is experienced from all angles.

## Density

9.62 Policy 3.4 of the London Plan 2016 requires development to 'optimise' housing output taking account of public transport accessibility, local context and character and design principles. The policy applies the sustainable residential quality density matrix which cross references existing development intensity against public transport accessibility to find an appropriate background density.
9.63 Despite its location adjacent to Brimsdown Station, the site is located on a PTAL "peninsula" with a public transport accessibility level score of 2, (where a score of 1 is poor and 6 is excellent), that is largely surrounded by significantly lower PTAL scores of 1b, 1a, and even zero. The character of the neighbourhood has an urban context. The London Plan matrix suggests that for an urban environment with a PTAL score of 2 to 3, a density of 200-450 habitable rooms per hectare ( $\mathrm{hr} / \mathrm{ha}$ ) is appropriate.
9.64 This proposal for 148 residential units would produce some 271 habitable rooms on a site that measures 4600 square metres would produce a residential density of approximately $590 \mathrm{hr} / \mathrm{ha}$. Whilst this figure would exceed the upper end of the density range and would suggest that from a numerical perspective, the proposal would represent an overdevelopment of the site, it has to be seen in the context of the design led approach to density that is presented by Policy D3 of the Intend to Publish London Plan that optimises the capacity of sites, without use of a density matrix as a guide.
9.65 This goes in hand with Enfield Core Policies 4 and 30 which stress the need for high-quality housing and the need to maintain and improve the quality of the built and open environment. Development Management Document 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.
9.66 The design-led approach requires consideration of design options to determine the most appropriate form of development that responds at a site's context and existing and planned supporting infrastructure capacity. In this context, the potential confirmation of Crossrail 2 could add to the local transport infrastructure and significantly improve rail services to Brimsdown Station in the process which would make density of the scale proposed easier to countenance should this development proposal proceed to construction.
9.67 In addition as a consequence of its careful design, the scheme demonstrates none of the typical symptoms of over development such as overshadowing, overlooking, unneighbourly intervisibility, loss of privacy, north facing single aspect units, cramped internal arrangements etc. Despite its very tall height, physically, the resultant scheme would relate wholly appropriately with the surrounding built context, even though its upper parts would be highly visible in long range views.

Landscaping
9.68 There is significant level of urban greening proposed by the development, including green roofs, soft and hard landscaping incorporating permeable paving including areas for childrens play.
9.69 In line with London Plan Policy 5.10 and the Mayor's Intend to Publish London Plan Policy G1 and G5. Features such as street trees, green roofs, green walls, rain gardens, wildflower meadows, woodland and hedgerows should all be considered for inclusion within schemes. Whilst the whole range may not be suitable in this instance, a number of these features could reasonably be additionally incorporated.
9.70 The applicant has calculated the urban greening factor of the scheme, as set out in Policy G5 of the Mayor's Intend to Publish London Plan, and aim to achieve the specified target of 3.8 which sits somewhere between the expected 3 for a commercial scheme and 4 for a residential scheme.

Highways
9.71 When the originally application was submitted there were originally concerns with the lower level of parking provided and the likely impact on the existing on street provision. Whilst the location nearby to the station was noted, it was not considered that the site is in a location to sustain a provision of 0.39 spaces, particularly given the mix of units including a high number of $2 x$ bed and $3 x$ bed units. The traffic generated by the commercial units was also of concern and was not fully addressed in the submission.
9.72 The current application revised the parking provision to 0.49 which is more acceptable than the previous proposals. However, how the parking would be allocated is still a concern, and the fact the site is not within a Controlled Parking Zone (CPZ) means that on street parking pressures may still increase as a result of the scheme.
9.73 This potential problem can be addressed through a Section 106 package of mitigation works. On a pro rata basis this is likely cost around $£ 150,000$ for a package of measures (car club, cycle infrastructure, travel plan, pedestrian infrastructure, parking surveys etc.) but further discussions were be required to clarify detail as the proposed development, particularly the commercial units, were considered likely to generate a significant volume of traffic which could potentially have a negative impact on the existing highway conditions, having regard to London Plan Policy 6.13 and DMD Policies $45 \& 47$.
9.74 Whilst additional information and observation has overcome this concern, the proposed development, by reason the site not being located within a Controlled Parking Zone, and due to the low parking provision in relation to the mix of units, is likely to have a significant detrimental impact on the parking pressures within the locality of the site, having regard to London Plan 6.13 and DMD Policy 45.
9.75 Confirmation from developer that CPZ funding will form part of S106 has overcome these concerns.

Section 106 (S106) Obligations

| Affordable Housing | Amount, tenure and mix to be secured |
| :--- | :--- |
| Green Street / Enstone Road enhancement / <br> Transport related works | Secure enhancement to the public realm <br> along the Green Street and Enstone Road <br> frontage including new parking provision and <br> access driveway crossing and related <br> highway works to be discussed with officers. |
| Car Club membership | Secure a commitment to offer for a period of <br> three years, a three year <br> membership to the local car club scheme per <br> residential unit, subject to a car club being <br> operational in the local area. |
| Car Club space | Provision of a car club space to Green Street <br> I Enstone Road |
| Travel Plan | Travel Plan implementation on occupation of <br> dwellings and business centre |
| Carbon offset contribution | Secure carbon offset contribution <br> EducationFinancial contribution towards local <br> education facilities |
| Management company | Secure the appointment of Managing Agents <br> to operate a management <br> company |
| Local Employment | Measures to maximise opportunities for local <br> business and for residents to gain <br> employment at the site. |
| Local Health Services | Financial contribution towards local health <br> facilities : £68,100 (to be updated) |
| Council's legal costs | Payment of the Council's costs associated <br> with monitoring of the S106 agreement <br> (TBC) |
|  | Payment of the Council's legal costs <br> associated with the preparation and <br> completion of the S106 agreement |

## Community Infrastructure Levy (CIL)

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

## 10. Conclusion

10.1 Planning decisions on applications are made by assessing how proposals accord with the development plan and material considerations.
10.2 The proposed residential led mixed use redevelopment of the site is acceptable in policy terms.
10.3 The proposed tall buildings are acceptable in policy terms and in how they relate to their surrounding context.
10.4 The proposal would represent a challenging, innovative piece of architecture that would be transformational in this locality and have the potential to have a long lasting regenerative impact.
10.5 Having regard to the above assessment it is recommended that planning permission be granted subject to conditions and a S106 Agreement.






























WHOLE ECHEME OVERYEW


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| :---: | :---: | :---: |
|  |  |  |
| Provision |  |  |
| Total Hab Rooms $217 \quad 51 \%$ |  | 214 |
| Affordable Rented $151 \quad 70 \%$ |  | 70\% |
| Intemediate Rented $66 \quad 30 \%$ |  | 30\% |
| Affordable by hab rooms | 51\% |  |
| Affordable rent by unit | 49\% |  |
| wheelchair accessible by unit | 12.2\% | 10\% |

AREAS OVERVIEW

| RESI NIA | $10,230.5 \mathrm{~m}^{2}$ |
| ---: | ---: |
| RESI GIA | $13,36.5 \mathrm{~m}^{2}$ |
| FLLEX. COMM. GIA | $1,14.5 \mathrm{~m}^{2}$ |
| PARKING GIA | $1,459 \mathrm{~m}^{2}$ |
| SHARED GIA | $91.0 \mathrm{~m}^{2}$ |
| Total GiA | $16,06.0 \mathrm{~m} \mathrm{~m}^{2}$ |


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