

LONDON BOROUGH OF ENFIELD

PLANNING COMMITTEE

Date: 24th November 2020

Report of:
Head of Planning

Contact Officer:
Andy Higham
Allison De Marco
Evie Learman
Tel: 0208 132 0873

Ward: Southgate
Green

Application Number: 20/01049/FUL and
associated Listed Building consent 20/01188/LBC

Category: Major

LOCATION: Car Park Adjacent to Arnos Grove Station, Bowes Road, London, N11 1AN

PROPOSAL:

20/01188/LBC

Alterations to curtilage listed walls to Grade II* Listed Amos Grove Underground Station involving partial demolition and rebuilding, retention and refurbishment of four existing listed lampposts two of which are relocated to accommodate a new public square.

20/01049/FUL

Erection of 4No buildings between one to seven storeys above ground level, with some elements at lower ground floor level comprising 162 residential units (Class C3) and flexible use ground floor unit (Class A1/A3/A4) together with areas of public realm, hard and soft landscaping, access and servicing arrangements, plant and associated works.

Applicant Name & Address:
Connected Living London (Arnos Grove)
Ltd
Citygate
St James' Boulevard
Newcastle Upon Tyne
NE1 4JE

Agent Name & Address:
Susie Byrne
Quod
7 Ingeni Building
Broadwick Street
London
W1F 0DE

RECOMMENDATION:

That subject to the completion of a S106 to secure the matters covered in this report, the Head of Planning or the Head of Development Management be authorised to GRANT planning permission and Listed Building consent subject to conditions.

Ref: 20/01049/FUL LOCATION: Car Park Adjacent To Arnos Grove Station, Bowes Road, London, N11 1AN



Drawing's / Application Documents:

Air Quality Assessment March 2020
Noise and Vibration Assessment Report March 2020
Sustainability Statement March 2020
Construction Resource Management Plan March 2020
Energy Statement March 2020
Ecological Technical Note March 2020
Biodiversity Net Gain Assessment March 2020
Arboricultural Impact Assessment March 2020
Fire Statement March 2020
MLUK-721-A-P-XX-1010 Proposed Site Plan rev 01: revised September 2020
MLUK-721-A-P-XX-1030 Proposed Site Elevations & Sections
MLUK-721-A-P-XX-1031 Proposed Site Elevations & Sections rev 01: revised September 2020
MLUK-721-A-P-XX-1032 Proposed Site Elevations & Sections
MLUK-721-A-P-A0-1200 Public Square - Level 00 Proposed GA Plan
MLUK-721-A-P-A1-1210 Bldg A01 - Level 00 Proposed GA Plan
MLUK-721-A-P-A1-1211 Bldg A01 - Level 01 Proposed GA Plan rev 01: revised September 2020
MLUK-721-A-P-A1-1212 Bldg A01 - Level 02 Proposed GA Plan
MLUK-721-A-P-A1-1213 Bldg A01 - Level 03 Proposed GA Plan
MLUK-721-A-P-A1-1214 Bldg A01 - Level 04 Proposed GA Plan
MLUK-721-A-P-A1-1215 Bldg A01 - Level 05 Proposed GA Plan
MLUK-721-A-P-A2-1219 Bldg A02 - Level B1 Proposed GA Plan
MLUK-721-A-P-A2-1220 Bldg A02 - Level 00 Proposed GA Plan
MLUK-721-A-P-A2-1221 Bldg A02 - Level 01 Proposed GA Plan
MLUK-721-A-P-A2-1222 Bldg A02 - Level 02 Proposed GA Plan
MLUK-721-A-P-A2-1223 Bldg A02 - Level 03 Proposed GA Plan
MLUK-721-A-P-A2-1224 Bldg A02 - Level 04 Proposed GA Plan
MLUK-721-A-P-A2-1225 Bldg A02 - Level 05 Proposed GA Plan
MLUK-721-A-P-A2-1226 Bldg A02 - Level 06 Proposed GA Plan rev 01: revised September 2020
MLUK-721-A-P-A2-1227 Bldg A02 - Level 07 Proposed GA Plan rev 01: revised September 2020
MLUK-721-A-P-B1-1230 Bldg B01 - Level 00 Proposed GA Plan rev 01: revised September 2020
MLUK-721-A-P-B1-1231 Bldg B01 - Level 01 Proposed GA Plan
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MLUK-721-A-P-B1-1233 Bldg B01 - Level 03 Proposed GA Plan
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MLUK-721-A-P-B2-1242 Bldg B02 - Level 02 Proposed GA Plan
MLUK-721-A-P-B2-1243 Bldg B02 - Level 03 Proposed GA Plan
MLUK-721-A-P-B2-1244 Bldg B02 - Level 04 Proposed GA Plan
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MLUK-721-A-P-B2-1246 Bldg B02 - Level 06 Proposed GA Plan
MLUK-721-A-P-XX-2100 Bldg A01 & A02 Sections
MLUK-721-A-P-XX-2101 Bldg B01 Sections
MLUK-721-A-P-XX-2102 Bldg B02 Sections
MLUK-721-A-P-A0-3100 Public Square Elevation - South
MLUK-721-A-P-A0-3101 Public Square Elevation - East
MLUK-721-A-P-A1-3110 Bldg A01 Elevation - South

MLUK-721-A-P-A1-3111 Bldg A01 Elevation - West
 MLUK-721-A-P-A1-3112 Bldg A01 Elevation - North
 MLUK-721-A-P-A1-3113 Bldg A01 Elevation - East rev 01: revised September 2020
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 MLUK-721-A-P-B1-3130 Bldg B01 Elevation - South
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 MLUK-721-A-P-B1-3132 Bldg B01 Elevation - North
 MLUK-721-A-P-B1-3133 Bldg B01 Elevation - East rev 01: revised September 2020
 MLUK-721-A-P-B2-3140 Bldg B02 Elevation - South
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 MLUK-721-A-P-B2-3143 Bldg B02 Elevation - East
 MLUK-721-A-P-XX-3200 Bay Study - Typical Projecting Balcony
 MLUK-721-A-P-XX-3201 Bay Study - Typical Inset Balcony
 MLUK-721-A-P-XX-3202 Bay Study - Deck Access Balcony
 MLUK-721-A-P-XX-3203 Bay Study - Bldg A01 Cafe
 MLUK-721-A-P-XX-3250 Bay Detail – Typical Window
 MLUK-721-A-P-XX-3251 Bay Detail – Typical Balcony
 MLUK-721-A-P-XX-3252 Bay Detail – Bldg B01
 MLUK-721-A-P-XX-3253 Bay Detail – Bldg B01
 MLUK-721-A-P-XX-3254 Bay Detail – Bldg B02
 MLUK-721-A-P-XX-3255 Bay Detail – Bldg A01 Café
 537-CTF-XX-00-DR-L-1000 Landscape General Arrangement Plan rev 01: revised September 2020
 537-CTF-XX-00-DR-L-1002 Landscape General Arrangement Plan - Bus Interchange
 537-CTF-XX-07-DR-L-1001 Green Roofs Plan
 537-CTF-01-ZZ-DR-L-2000 Plot A Landscape Sections
 537-CTF-01-ZZ-DR-L-2001 Plot A Landscape Sections
 537-CTF-02-ZZ-DR-L-2002 Plot B Landscape Sections
 537-CTF-XX-ZZ-DR-L-5000 Planting Plan
 537-CTF-XX-XX-DR-L-7000 Tree Removal Plan

1.0 EXECUTIVE SUMMARY

- 1.1 The application proposes a high quality residential led development on existing Brownfield land in a highly sustainable location. The Development will make a significant contribution towards the Borough's and wider London housing needs and will help Enfield to meet its growing population. Developing on Brownfield land also protects the Borough's greenfield and greenbelt land thus preserving this important characteristic of Enfield.
- 1.2 The benefits of delivering housing on an underutilised brownfield site in a highly accessible location (directly adjacent to a tube station), partially within and directly adjacent to a designated local centre (Arnos Grove Local Centre) has strong planning policy support and should be afforded substantial weight in the determination of the application. The site is situated directly adjacent to a tube station and bus interchange – providing a robust case for a car-free development.
- 1.3 The Development will deliver 40% Affordable Housing (by habitable room), comprising 64 new high-quality affordable homes. The proposal is a Build-to-

Rent scheme, providing on-site management and concierge as well as a residents' lounge and gym and high-quality public realm and amenity areas.

- 1.4 Housing need continues to rise in the Borough and the actual delivery of homes to meet the needs of residents has not kept a pace. Over the last 5-years, approximately 550 new residential units per year have been delivered – significantly below the 798 units that are required by the adopted London Plan. Housing delivery continues to be a priority as well as a challenge.
- 1.5 The proposal to introduce residential use to this under-utilised site responds positively to London Plan and the Mayor's Intend to Publish London Plan policies to increase housing supply and optimise sites and is supported. The site has an excellent PTAL of 4 - 6a (6a being excellent), is adjacent to an underground station and a bus interchange. As such, this site is an optimal location for residential development and the proposed 162 new residential units are strongly supported in principle. The introduction of a small flexible commercial space or residential amenity space is supported in strategic terms.
- 1.6 The redevelopment of car parks and public sector owned sites for housing is supported by the London Plan (Intend to Publish). As such the Proposed Development aligns with emerging policy and can contribute towards the Borough's predicted housing needs. The site is identified as an 'opportunity site' within Enfield's adopted development plan (North Circular Area Action Plan – at NC Policy 2: Opportunity Site 7). NC Policy 17 also sets out that the site has potential to be released for redevelopment. The principle of development is supported at this location (detailed assessment below).
- 1.7 The Development provides for new employment opportunities (at construction stage and post-build) and these are considered to support the objectives within the Corporate Plan, emerging new Local Plan and economic development strategy, contributing positively to local economic impact. Local labour and training obligations will also contribute positively to regeneration objectives.
- 1.8 The Development has been designed to be appropriately respectful of and responsive to context in terms of scale, massing and design. There are differing heights and massing across the development (assessed in detail below). Officers have assessed that the massing approach represents a sensitive and appropriate response at this location. The introduction of some scale and height at this location is supported.
- 1.9 The proposed mix and size of units is considered appropriate location. Given the overall good standard of accommodation and amenity space, which includes private amenity for 100% of the units as well as communal amenity space in excess of policy requirements.
- 1.10 Given the scale and proximity of the Development to neighbouring properties, it is acknowledged some impact on the residential amenity of neighbouring properties may ensue, however the scheme has evolved to minimise this potential harm and has been designed to pull away from the nearest residential properties. Impacts have been assessed in detail below.
- 1.11 The scheme would create a new public square fronting Bowes Road and the bus interchange, including areas of new planting and seating. A small

commercial unit is also proposed with the potential for flexible use, according to local market need which would help to boost the local economy and introduce an active non-residential frontage towards Bowes Road.

- 1.12 The Site is currently used as a car park. The proposal will reduce the number of car parking spaces to restrict car usage from 313 to 21 which is expected to reduce the number of vehicles in the area overall. Surveys were taken on existing trip origin of existing car park users. The results are considered below, but they show: most car park users have the potential to change their travel behaviour; and less than half of the (46%) of existing car park user trips originate in Enfield.
- 1.13 The proposal would substantially reduce vehicle movements generated by the site's use as a car park, particularly during the week. This is expected to have the effect of encouraging sustainable modes of travel such as walking, cycling and public transport and improve air quality by reducing the number of vehicles on the road.
- 1.14 Of the 21-spaces proposed to remain 10 will re-provide LUL spaces and 6 will re-provide station blue badge spaces and 5 spaces will be blue badge spaces for the proposed residential development. There will also be 11 passive blue badge spaces for the proposed residential development and 288 new long and short stay (resident and visitor) cycle parking spaces. The current 22 station cycle spaces will be re-provided as part of the development. Traffic and transportation issues are discussed in further detail below.
- 1.15 The public benefits of the scheme can be summarised as follows:
 - **Placemaking benefits, including a sympathetic heritage-led design response** – Arnos Grove Station is a Grade II* listed building of unique importance to Enfield. It is one of the most highly regarded examples of Charles Holden's ground-breaking Modernist designs for the Piccadilly line extension. It is a key landmark for the local area. The proposed scheme is designed by RIBA Stirling award winning architects, Maccleanor Lavington. The design, scale and density of the scheme are assessed as have sympathetically responded to this important designated heritage asset – positively preserving and enhancing it. The proposals would result in an improved setting, including through the introduction of a new public square to the west of the station building. The Enfield Society, Enfield Conservation Officers, the Conservation Advisory Committee and the Greater London Authority are supportive of the heritage merits and benefits of the scheme. Enfield's independent Design Review Panel concluded, in their last review, that the height and scale of the scheme was appropriate for the surrounding context.
 - **Optimising the site capacity by introducing new high-quality housing** – making effective use of a highly accessible (directly adjacent to a tube station), low density brownfield site for 162 new high-quality rented homes (Build to Rent). All homes would meet, and in some cases exceed, draft London Plan (ItP) Policy requirements for Build to Rent, including minimum tenancies of up to 5 years to all tenants; rent and service charge certainty for the length of the tenancy; and secure on-site management. The proposal would support Ambitions 1, 3, 4 and 5 of Enfield's 'Housing and Growth Strategy' (2020).

- **Socially sustainable and balanced housing market** – The Application Site is located within an area primarily characterised by owner occupied housing and other private tenures. The proposals would introduce affordable housing, supported by London Plan policy and guidance (adopted and draft), which would encourage socially sustainable, balanced housing market and address a lack of affordable homes in the local area – enabling local people to access good quality housing.
- **Affordable housing, including family housing for local people** – 40% affordable housing by habitable room, which would meet an identified local need for affordable Discounted Market Rent housing (with 30% at London Living Rent levels), supported by London Plan policy and guidance (adopted and draft). Approximately 56,000 Enfield households could be eligible to access the affordable element. These would be households unlikely to be eligible for council allocated housing but who are also unable to afford private sale housing. All family homes (3-bed) in the scheme are affordable. Viability reviews have been agreed –with potential to direct any surplus towards improving 3-bed / family housing affordability.
- **Introducing a compatible land use** – The proposals would introduce compatible residential-led land use – beneficially reducing privacy, noise, air quality, and disturbance issues arising from the current publicly accessible car parking to rear of homes along Brookdale, Walker Close and Arnos Road. The removal of the car parks would replace an existing arrangement of low townscape quality, which does not contribute towards, and potentially detracts from the listed building's significance.
- **Apprenticeships, skills and training opportunities for local people** – Approximately 250 jobs would be created over the construction period.
- **A net increase in trees and biodiversity net gain exceeding target** – introducing 28 net additional trees and 30.80% biodiversity net gain (exceeding Environmental Bill / forthcoming Act requirements). The scheme increases greening on-site, in accordance with the relevant draft London Plan (ItP) Urban Greening Factor target.
- **Targeting a carbon neutral borough by 2040 (Enfield Climate Action Plan 2020)** – Enfield envisages that by 2040, most journeys that originate in the borough will be made by methods that are either low carbon, or do not emit carbon. The proposal would positively contribute to this target and the Council's aim for Enfield to become carbon neutral by 2040.
- **A healthy development and less road traffic** – the loss of car parking has generated significant objection (assessed in detail below). The loss of parking would also, however, result in benefits which would have associated pedestrian, cycle and road safety benefits. The whole borough is an Air Quality Management Area, by prioritising walking and cycling and low carbon transport, the proposals have potential to improve local air quality. This will also support Enfield in achieving the Mayor of London's target to increase active and sustainable modes across London to 80%.

- **An improvement in on-site sustainable urban drainage (water management)** – The proposals would replace two car parks characterised by impermeable hardstanding with 162 new homes incorporating 50% green roofs, rain gardens, swales and permeable paving - optimising sustainable urban drainage compared to existing.

2.0 Recommendation

- 2.1 That subject to referral to the Mayor of London for his consideration at Stage 2, the Committee resolve to GRANT planning permission and Listed Building Consent and that the Head of Planning or the Head of Development Management is authorised to issue the planning permission and impose conditions and informatives subject to the signing of a section 106 Legal Agreement providing for the obligation set out in the Heads of Terms below.
- 2.2 That the section 106 legal agreement referred to in resolution (2.1) above is to be completed no later than 31/03/2021 or within such extended time as the Head of Development Management shall at their discretion, allow; and
- 2.3 That, following completion of the agreement(s) referred to in resolution (2.1) within the time period provided for in resolution (2.2) above, planning permission be granted in accordance with the Planning Application subject to the attachment of the conditions below.
- 2.4 That delegated authority be granted to the Head of Planning or the Head of Development Management to make any alterations, additions or deletions to the recommended heads of terms and/or recommended conditions as set out in this report and to further delegate this power provided this authority shall be exercised in consultation with the Chair (or in their absence the Vice-Chair) of the Planning Committee.

2.5 Conditions

Full Planning:

1. In Accordance with Approved Plans.
2. Development Begun no Later than Three Years.
3. Materials:
4. Boundary Treatment/s:
5. Playspace Design:
6. Landscaping and Public Realm Implementation Plan:
7. Secure by Design:
8. Inclusive Design - M4(2) and M4(3):
9. Sustainable Drainage Strategy including Rainwater Harvesting:
10. Sustainable Drainage Strategy - Verification Report.
11. Lighting Details / Plan (Building & Public Realm):
12. Site Management Plan (operational) / Refuse & Recycling Strategy.
13. Noise Levels – Construction:
14. Noise Mitigation Measures (future occupants):
15. Disabled Parking.
16. Car Park Management Plan (Final).
17. Details of Cycle Parking.
18. Delivery and Servicing Management Plan (operational).

19. Construction Logistics Management Plan (CLMP), produced in line with TfL's latest CLMP guidance.
20. Construction Resource Management Plan (CRMP):
21. Tree Protective Measures / Construction Works within Root Protection Area
22. Habitat Survey (Phase 1).
23. Contaminated Land – Remediation.
24. Contaminated Land – Verification.
25. Energy Statement.
26. Thermal Comfort:
27. Communal aerial:
28. Details of any Rooftop Plant, Extract Ducts and Fans including Plant Acoustic Report (technical):
29. Details of any rooftop plant, extract ducts and fans (appearance):
30. Thames Water.
31. Fire evacuation lift:
32. Electric vehicles:
33. Nesting Boxes.
34. Access demarcation.
35. Taxi stand details
36. Blue badge parking and survey

2.6 Listed Building Consent:

1. In Accordance with Approved Plans.
2. Development Begun no Later than Three Years (LBC)
3. The development shall not begin until details of suitable precautionary measures to secure and protect the Grade II* listed station building against accidental loss or damage during the building work has been submitted to and approved in writing by the Local Planning Authority. No such elements may be disturbed or removed temporarily or permanently except as indicated on the approved drawings or without the prior approval in writing of the Local Planning Authority.
4. Samples of all the types of external materials and finishes to be used in the proposed development (including windows, doors, balconies, railings, surfacing materials, roof finish, architectural features, brick type, face bond, render, external cladding and paintwork), are to be erected on site and approved in writing by the Local Planning Authority prior to the commencement of the relevant parts of work. The development shall be completed in accordance with the approved details.
5. No above ground works shall commence until drawings, including sections, to a scale of 1:20 or larger, detailing all proposed external architectural features including windows (including cills, reveals, heads, window furniture) doors (including jambs, frame, door case, door furniture), roof (parapet detail), balconies, bin stores and all means of enclosure have been submitted to and approved in writing by the Local Planning Authority. The aforementioned features shall be installed in accordance with the approved details.
6. No works to any curtilage listed structures shall commence until a full method statement, detail drawings with sections at a scale of 1:20 or

larger, and a detailed schedule have been submitted to and agreed in writing by the Local Planning Authority pertaining to

- a) the proposals for the temporary removal, repair and relocation of the four curtilage listed lamp standards, and
- b) the proposals for the removal of the curtilage listed dwarf walls and railings on the north and south sides of the forecourt

The development shall only be carried out in accordance with the relevant detail drawings, method statement and schedule.

- 7. Any works of demolition shall be carried out by hand only.
- 8. Should any archaeological remains be discovered in the course of development the developer must contact Greater London Archaeology Advisory Service (GLAAS) so that an assessment can be made for the formulation of mitigating measures or the instigation of contingency procedures.
- 9. All new work and finishes and works of making good shall match original work in the existing original fabric in respect of using materials of a matching form, composition and consistency, detailed execution and finished appearance, except where indicated otherwise on the drawings hereby approved.
- 10. The four lamp standards, recovered bricks from the northern dwarf boundary wall and attached railings shall be removed under the supervision of a specialist contractor approved by the local planning authority and stored in a suitable place to be agreed in writing by the local planning authority. Suitable precautions must be taken to secure and protect architectural features against accidental loss or damage during the building work.

2.7 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
- 9) Underground Water Supply/Drainage Assets
- 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

21) Sustainable Infrastructure

Section 106 Heads of Terms

- 2.8 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.
- 2.9 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.
- 2.10 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).
- 2.11 These are the Heads of Terms proposed. Monetary contributions will be updated by way of update report:
1. Affordable housing:
 - a. Minimum of 40% by habitable room (39.5% based on units);
 - a. Tenure mix 30% London Living Rent (LLR) and 70% Discounted Market Rent (DMR)
 - b. Rents set up to 65-70% of open market rent rates subject to the GLA's household income cap in place at the time of letting;
 - c. Marketing of Shared Ownership homes – prioritising households that live or work in the Borough;
 - d. All related communal open space and play space in a particular Block or Plot to be available to all residents (irrespective of tenure);
 - e. Quality standards;
 - f. Affordable housing secured in perpetuity.
 2. Viability Review Mechanisms:
 - a. Early Stage Review (if no "substantial commencement" within 24 months);
 - b. Late Stage Review (prior to 75% of private residential units being sold or let); and
 - c. Early and Late Stage Reviews capped at 40% Affordable Housing ((30% London Living Rent (LLR) and 70% Discounted Market Rent (DMR)).
 3. Build to Rent requirements:
 - a. 15-year minimum covenant;
 - b. Clawback clause;
 - c. Self-contained and let separately;
 - d. Unified management and ownership;

- e. Tenancies of up to 5-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; and
 - i. No up-front charges etc.
4. New homes Sustainable Transport Package:
 - a. Car Club Membership for 3 years (driving credit to be agreed) and reasonable endeavours to secure a car club space and operator with the Council;
 - b. Oyster Card (credit to be agreed); and
 - c. London Cycling Campaign Membership for 1 year / household.
 5. Sustainable Transport Infrastructure (Healthy Streets and improvements)
 - a. Local improvements in line with ATZ / Healthy Streets Assessment to improve local pedestrian, cycle and other transport related infrastructure (to be agreed).
 6. Local Pedestrian Infrastructure Surveys:
 - a. Applicant to agree to make funds available for surveys to assess the impact of the proposals (before and after occupation).
 - b. Surveys to identify local improvements (related to the development), such as a pedestrian crossing along Bowes Road. Implementation of necessary improvements (related to the development) via Section 278 agreement (to be agreed).
 7. Drop off Surveys and Highway Alterations:
 - a. Drop off surveys and related highway alterations related to the closure of the station car park.
 - b. Implementation of necessary improvements (related to the development) via Section 278 agreement.
 8. Local Car Parking Controls: Management and Monitoring:
 - a. A contribution towards monitoring and consultation on an extension to the CPZ near the development
 - b. Local parking consultation and extension: If post occupancy surveys show impacts with the existing CPZ, then funds provided for consultation on potential extension (to be agreed).
 9. New Resident Parking Exemption
 - a. Resident car ownership would be managed by the developer, including a clause within resident contracts restricting them from applying for or being eligible for on-street parking permits within the relevant Controlled Parking Zone.
 - b. The CPZ exemption will be secured via the S106 agreement using powers under S16 of the Greater London Council (General Powers) Act 1974
 10. Station Access Road
 - a. Improvements associated with the development of the site, within the red line boundary will be implemented through a Section 278.
 - b. The proposed alterations to site accesses will require works to the site frontage along the highway which would be delivered by LBE through a Section 106 contributions

11. Travel Plan monitoring (£tbc)

- a. A Travel Plan will be prepared and implemented, managed by a Travel Plan Coordinator appointed by the Developer;
- b. Travel Plan Monitoring fee (to be agreed).and commitment to review;
- c. Appointment of Travel Plan Coordinator and monitoring of Travel Plan initiatives including TRICS compliant surveys.

12. Energy

- a. First priority DEN connection with cascade mechanism;
- b. Development to provide no less than a 35% improvement in total CO² emissions arising from the operation of the development and its services over Part L of Building Regs 2013.
- c. Non-domestic element to meet a target of a minimum 15% improvement on 2013 Building Regulations from energy efficiency.
- d. Revised Energy Statement to be submitted;
- e. Be Seen (Post construction monitoring). Post construction monitoring as per 'be seen' guidance.

13. Carbon Offsetting financial contribution:

- a. Payment of off-set contribution;
- b. Sign up to GLA energy monitoring platform.

14. Employment & Training:

- a. Local Labour (during construction phase); and
- 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).

15. Public Realm

- a. Public Realm Use and maintenance of the square – to be delivered as a publicly accessible space and maintained by the developer
- b. Public access – ensuring public access to proposed square (365 days, 24/7).

16. Play Space

- a. Play space provided on site shall be accessible to all housing tenures.

17. Architect Retention Clause

- a. Retention of architects

18. Other:

- a. Financial contributions to be index-linked;
- b. Considerate Constructors Scheme;
- c. Health care;
- d. LBE monitoring fee (max 5% of financial contributions);
- e. s278 agreement in line with specification to be agreed, subject to surveys.

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3.0 Site and Surroundings

- 3.1 The site comprises two existing car parks at Arnos Grove underground station located in the South West of the borough in the Southgate Green Ward. The two surface level car parks are referred to in the application as Sites A and B with Site A to the west of the station building and Site B to the east. Arnos Grove Underground Station serves the Piccadilly line between Cockfosters station and Heathrow airport.
- 3.2 The site is well connected in terms of public transport and has a Public Transport Accessibility Level (PTAL) rating of 4-6a with 4 being 'good' and 6a 'excellent'. As well as the underground station the site is well served by buses. A bus interchange is located directly to the front of the station on Bowes Road. Also, along Bowes Road lie a number of commercial and retail units with many of these containing residential accommodation above. The ground floor units contain a mixture of uses, including estate agents, convenience stores, cafes, food outlets and hairdressers. The Arnos Arms public house and car park is also located in close proximity to the station and residential properties lie slightly further along Bowes Road to the east. Other uses in close proximity include an indoor swimming pool, a library and an NHS medical clinic. Arnos Park and a number of places of worship and schools are also nearby.

Site A

- 3.3 Site A, the car park located to the west of the station and railway tracks, is approximately 0.68 ha in size, provides 180 spaces and six blue badge holder spaces. The Site contains structures listed by virtue of the curtilage of the Grade II* listed station. The car park is situated on a slightly raised plateau, with the land banking down to the east, west and north, resulting in approximately a one-storey level change across the Site. Site A generally falls towards to the north. The Site falls from approximately 45mAOD near Bowes Road to approximately 36mAOD in the north.
- 3.4 Within Brookdale, Nos 1, 3, 5, 7, 9, 11, 13, 15, 17, 19, 21, 23, 25, 27, 29 and 31 would be in closest proximity to the Development. The rear of these properties would face the development and would typically accommodate bedrooms at first floor level and living and/or dining rooms at ground floor. On Bowes Road, Nos 348, 350, 352 and 354 would be in the closest proximity to the development. These properties are characterised by commercial uses on the ground floors and residential accommodation situated above.

- 3.5 An area of dense trees and shrubs designated as Metropolitan Open Land (MOL), lie to the north of Site A. In addition, the eastern edge of Site A is bound by dense trees and shrubs designated as a Site of Borough Importance for Nature Conservation (SINC), and Arnos Grove station. Beyond this lie the Piccadilly railway tracks which form part of a Wildlife Corridor designation. Site A is bound to the south by the A1110 Bowes Road, and to the west by the gardens of properties fronting Brookdale, a residential street of two-storey terraces and detached houses.

Site B

- 3.6 Site B, the car park located to the east of the station and railway tracks, is approximately 0.45 ha in size and provides 117 spaces, and 10 LUL staff spaces. This Site comprises hardstanding and adjoins a wall that forms part of the Grade II* listed station. To the east, Site B is bound by gardens of two-storey houses which form part of Arnos Road, and to the south by the A1110 Bowes Road. Within Arnos Road No's 3, 5, 7, 9, 11, 13, 15, 17, 19 and 21 are in closest proximity to the development and within Bowes Road The Arnos Arms at No.338 Bowes Road is in closest proximity. Walker Close to the north of the Site is also in close proximity with Nos 1, 2, 3, 4, 5, 6 and 27 being the most relevant.
- 3.7 With regards to the Arnos Road properties, the rear of the properties face onto the Proposed Development, and the rooms typically located at the rear would comprise bedrooms at first floor level and lounge/kitchen/dining rooms at ground floor level. Whilst in Walker Close because of the orientation of these properties it is the southern side elevations of the properties that would face the Proposed Development.
- 3.8 A series of mature trees line the west boundary of the Site which also form part of the SINC designation. Beyond this, is the embankment and London Underground Piccadilly line tracks which are also within the Wildlife Corridor designation. The Arnos Arms pub is located east of the Site on Bowes Road, and is a non-designated heritage asset.

Sites A and B

- 3.9 To recap the above the properties in closest proximity to the Proposed Development are as follows:
Bowes Road – No's 348, 350, 352 and 354
Brookdale - No's 1, 3, 5, 7, 9, 11, 13, 15, 17, 19, 21, 23, 25, 27, 29 and 31
Walker Close – No's 1, 2, 3, 4, 5, 6 and 27
Arnos Road – No's 3, 5, 7, 9, 11, 13, 15, 17, 19 and 21
The Arnos Arms 338 Bowes Road
- 3.10 The following policy designations / characteristics apply to the site:
- Flood Risk: The Site is located within Flood Zone 1 (classified as 'low risk').
 - Listed Building: The underground station and items within the curtilage
 - Local Centre: The frontage of Site A and the Underground Station are within Bowes Road Local Centre;

- Metropolitan Open Land (MOL): The area to the north of Site A, within the Site boundary is designated Metropolitan Open Land;
- North Circular Area Action Plan Opportunity Site (Site 7);
- New Southgate Place Shaping Area;
- Place Shaping Priority Area / Regeneration Priority Area / Area Action Plan;
- Site of Borough Importance for Nature Conservation (SINC): The site is adjacent to (but outside of) a SINC which runs along the railway track in the centre and to the north and also encompasses a Wildlife Corridor; and
- Tree Preservation Order: There is a cluster of Tree Preservation Orders (TPOs) to the north of Site B, adjoining the Site boundary.

4.0 Proposal

- 4.1 Changes to the Use Classes Order 1987 came in to force on the 1st 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.
- 4.2 This is an application for the erection of four Built-to-Rent blocks comprising 162 residential units (Class C3) and a flexible use ground floor unit (A1/A3/A4) together with areas of public realm, hard and soft landscaping, access and servicing arrangements, plant and associated works. An associated Listed Building Consent application also accompanies the application for partial demolition and rebuilding, retention and refurbishment of four existing listed lampposts two of which are relocated to accommodate a new public square.
- 4.3 The building heights and unit numbers would be as follows:
- Block A01, Site A: part 1-storey, part 4-storeys (34-units)
 - Block A02, Site A: part 6, part 7-storeys, with elements at lower ground (66)
 - Block B01, Site B: 3-storeys (16-units)
 - Block B02, Site B: part 5 storeys, part 6-storeys (46-units)
- 4.4 The tallest of these buildings – Block A02: will be located towards the north-eastern corner part of the site nearest to Arnos Park at the rear, with the shortest building within the group of four (Block B01: 3-storeys being located at the front of the site, nearest to Bowes Road to the south-west. Block A01 includes a 1-storey element fronting the proposed square.
- 4.5 The emphasis of the proposed buildings' fenestration is on the horizontal to tie-in with Charles Holden's art-deco architecture of the station and also the art-deco reflected in the locality and surrounding townscape. The design of the scheme is the result of substantial pre-application engagement to produce high-quality building's and public realm which incorporates and reflects the vernacular of the surrounding townscape. In addition, the articulation and materiality of the buildings have been carefully considered to provide a contemporary and sympathetic interpretation of the Grade II* station and associated heritage assets.

- 4.6 Some level of parking for the proposed development will be retained in the form of blue badge spaces and also the re-provision of spaces for London Underground Ltd (LUL) staff. Otherwise the proposal will be car free in line with current and emerging Enfield and London Plan policy, as the Borough and city move closer to addressing climate change by facilitating such measures as car free development with good public transport links such as this.
- 4.7 The scheme proposes the provision of 40% affordable housing (by habitable rooms), with a breakdown of 30% London Living Rent and 70% Discounted Market Rent. The remainder of the units would be let at open market rent levels.
- 4.8 As is typical in Built-to-Rent developments a resident/tenants' lounge, concierge and gym will be available for everyone living at the development. The proposal also includes 158 sq.m of doorstep play, plus 150 sq.m of 'incidental' playspace for 0-5-year olds: this will be spread across both Sites A and B. In addition, a further 120 sq.m of play 'opportunity' for children aged 5+ is proposed within Site A, which also houses the affordable tenure units.
- 4.9 In terms of cycle parking the proposal will provide 282 long stay cycle parking spaces for residents which will be secured and covered within the buildings. Six external short stay visitor cycle parking spaces will also be provided. With regards to car parking, five blue badge spaces are proposed (3% of the total number of homes), with the landscape within the scheme being designed in such a way that a further six blue badge spaces (10% in total, or a further 7%), could become available should the demand arise.
- 4.10 All of the above matters are discussed further in the main body of the report below.

5.0 Relevant Planning Decisions

- 5.1 In October 2017 an application for the conversion of the first floor of the Arnos Arms, 338 Bowes Road, from public house accommodation to 4 x 1-bed self-contained flats involving new entrance at rear (application reference 17/01590/FUL) was granted planning permission.
- 5.2 Over the last 20-years there have been a number of listed building consent applications for minor alterations to the station building have been submitted. One of these was a 2004 Listed Building Consent application (application reference LBC/03/0020/2) for repair and refurbishment of historic features within the station. This was approved in 2005. Further applications have been made since then for works such as the installation of a ticket checking kiosk, replacement cabins on the platform and other repairs.
- 5.3 In September 2019 an EIA Screening Opinion request was made to the Council to establish whether the proposed works would constitute EIA development as assessed against Regulation 6(1) of the EIA Regulations. The council agreed that the Development did not constitute EIA development. (Application reference 19/03312/SO)

Pre-application and changes post submission

- 5.4 The scheme has been the subject of an extensive pre-application process in line with best practice and as recommended in the NPPF. This process included meetings and workshops with officers, independent design review by Enfield Design Review Panel, presentation to planning committee at pre-application stage (a Technical Briefing), stakeholder engagement and public consultation and engagement. The scheme proposals have evolved during the course of negotiations with the applicants (including during pre-application stages) in response to comments.
- 5.5 Some revisions have been made to the scheme during the assessment of the application. These revisions have comprised as follows:
- Revised boundary treatments have been proposed on both Sites A and B however the final details of these (height and materials) are subject to a planning condition);
 - Changes to incorporate a balcony in Building A01 to one unit that previously did not have one. All units now have at least a 5 sq.m private balcony; and
 - Building B01 – external amenity and defensible space: Changes have been made to alter external amenity space provided to the north and west of building B01 from communal to private resulting in a minor change to the communal amenity from 3,438sqm to 3,230sqm and an increase in the Urban Greening Factor score from 0.417 to 0.419. Additionally, a 700mm concrete spandrel panel has been added to the four eastern ground floor units to B01 to provide security and privacy to those units.
- 5.6 The indicative accommodation schedule (discussed later in this report) demonstrates that the proposals have been designed to offer a range of housing sizes appropriate for the location of the site. Policy standards contained within the London Plan, the Mayor's Housing SPG and Enfield's Development Management DPD, particularly DMD Policy 8 General Standards for new residential development seek to ensure residential developments are of the highest quality. In accordance with these policies the proposed housing units will meet or exceed the minimum space standards identified within Table 3.3 of the London Plan and respond to the design principles contained in the Mayor's Housing SPG 2012. Outdoor amenity space standards are also discussed later in this report.
- 5.7 The application documents demonstrate how the scheme has evolved through the pre-application process, and post submission, and that the proposals are of high quality, comply with the London Housing Design Guide and Lifetime Home Standards.

6.0 Consultations

- 6.1 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.
- 6.2 Paragraph 3.1.1 of the adopted version sets out the expectation of the Council:

"The Council aims to involve the community as a whole: to extend an open invitation to participate but at the same time ensure that

consultation is representative of the population. To achieve this, a variety of community involvement methods will need to be used. Targeted consultation of stakeholders and interest groups, depending upon their expertise and interest and the nature and content of the Local Plan documents, or type of planning application, will be undertaken.”

Paragraph 5.3.6 goes on to state:

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

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

Applicant consultation

- 6.3 Communications company Concillio, on behalf of the applicant, have submitted a Statement of Community Involvement (SCI) as part of the application to demonstrate how they engaged with the local community. The SCI states that the programme of consultation ran from June 2019 to March 2020, with the digital element live from 7th November 2019 to 13th December 2019 and included seven meetings with political stakeholders; meetings with three key community groups; a ‘Meet the Team’ event; one public consultation over 2-days; and various electronic and non-electronic (leaflets and posters) communication.
- 6.4 This demonstrates that the applicants have made significant efforts to engage with local residents, businesses and stakeholders to try and address questions, queries and concerns in relation to the proposal.

Technical briefing

- 6.5 A Technical Briefing with Planning Committee Members was held on 5th November 2019. The purpose of the Briefing was to provide an overview of the scheme to date however the Briefing was not a forum for discussion of the proposal. The briefing was well attended by Members.

Public

- 6.6 In total 1,349 neighbouring properties were consulted. The consultation period ran for 21-days from the 19 May 2020 to the 09 June 2020. In addition, site notices were displayed in close proximity to the site and a press advert was placed in the Enfield Independent on the 13 May 2020.
- 6.7 In addition to the initial consultation the application was subject to a second consultation to update and clarify the development description. The second consultation period ran for a further 21-days from the 23 October 2020 with further site notices displayed a further press advert placed on the 28 October 2020.
- 6.7 The number* of representations received from neighbours, local groups etc in response to notification and publicity of the application were as follows:

- 98 responses to the full planning application have been received
- 28 responses to the Listed Building Consent application have been received
- 2 petitions have been received with one listing 32-signatories (submitted by Cllr Daniel Anderson) and one listing 33-signatories (Bowes Road residents). It is noted that the 32-signatory petition pre-dates the submission of the application. Concerns raised are summarised below along with individual comments.
- Number of supports received: 3
- Number of neutral representations received: 1

*some people have submitted comments more than once and these have been counted separately

6.8 Material concerns are listed below with the relevant section of the report sign-posted in brackets:

6.8.1 Objections

- Too close to adjoining properties (*Para. 8.9.1 onwards*)
- Too high (*Para. 8.7.1 onwards*)
- Unpleasant environment for future occupiers in terms of noise generating from the station (*Para. 8.6 onwards*)
- Would ruin existing views (*Para. 8.7.1 onwards*)
- Overpopulated (density) (*Para. 8.4.1 onwards*)
- Increased traffic particularly along Bowes Road (*Para. 8.10.1 onwards*)
- Increased pressure and displacement of parking (*Para. 8.2.1 and 8.10.1 onwards*)
- Increased pressure on local facilities e.g. schools (*Para. 8.17 onwards*)
- Does not align with policy (*Para. 8.2 onwards*)
- Inadequate access (*Para. 8.9.13 onwards*)
- Inadequate parking provision (*Para. 8.2 and 8.10 onwards*)
- Affect local ecology (*Para. 8.13 onwards*)
- Out of keeping with the character of the area (*Para. 8.6 onwards*)
- Loss of privacy / overlooking (*Para. 8.9 onwards*)
- Loss of light (*Para. 8.9 onwards*)
- Light pollution (*Para. 8.9 onwards*)
- Noise pollution including from construction (*Para. 8.9 onwards*)
- Air pollution including from construction (*Para. 8.16 onwards*)
- Overshadowing (*Para. 8.8.9 onwards*)
- Close to adjoining properties (*Para. 8.8.9 onwards*)
- Inappropriate height for a building in close proximity to Grade II* listed building (*Para. 8.7 onwards*)
- The retail unit will adversely impact retailers nearby (*Para. 8.2 onwards*)
- Lack of truly Affordable Housing / would not be affordable (*Para. 8.2 onwards*)
- Adversely impact health and wellbeing (*Para. 8.17 onwards*)
- Existing trees should remain (*Para. 8.11 onwards*)
- Increase risk of flooding (*Para. 8.12 onwards*)
- Not enough publicity and consultation (*Para. 6.0 onwards*)
- Appropriate public cycle spaces need to be provided (*Para. 8.10 onwards*)

6.8.2 Support

- Removing the car park will encourage more sustainable travel patterns to the station.
- Alternatives exist for users of the station.
- These new homes with no car parking except for disabled residents, with plentiful bike parking and a great level of public transport access, will help support residents in the car-free lifestyle that we need to see increasing across Enfield with its growing population.
The development will provide a new public square, helping to improve the public realm in Arnos Grove to the benefit of other residents and visitors.
- This area is severely lacking low density, sympathetically designed affordable rent housing for key workers and others with a need to access to central London but unable to get on the housing ladder
- Pleased that the buildings will be for rent with a high proportion of affordable properties
- The designs are of a high quality and in keeping with the station
- Pleased that there will be shops/cafes in the development
- Pleased that the development will encourage the use of public transport and will eliminate all but essential disabled parking on the site
- It is a forward-looking proposal for Enfield

6.8.3 Consultation responses that fall outside of the remit of Planning (i.e. are non-material are given below:

- Negative effect on prices of property
- Negatively impact on ambience and the immediate neighbourhood
- Impact on safety for people not able to use car park and having to walk further to where cars are parked in surrounding area and fear of safety around the new square at night
- Fear that further defacing of the architectural distinction of the station buildings will occur
- Concerns about the accuracy of the documents and images submitted (ie. 'artistic license')
- Not appropriate to be assessing application in the wake of Covid-19
- Need to increase public transport if there is a wish to stop people using cars
- Tenancies are all short-term
- Area has become over-developed
- Development is 'profiteering'

6.9 The following local groups/societies made representations:

6.9.1 *Bowes Road Residents Group (comments summarised):*

- The interests of the developers are being put before residents.
- Recent major residential developments near the Homebase Depot site and on the A406 has already damaged the environment and quality of life for residents of Bowes Road. This development will add even more people to the population which means local infrastructure and services will be further over-stretched.
- Traffic along Bowes Road is very heavy and fast moving outside rush hours between the station and the A406. Air pollution and noise have got substantially worse over recent years and pedestrian and cyclist safety is deteriorating significantly.

- The loss of the station car parks will increase car movements along Bowes Road as these displaced cars seek alternative parking and people drive to the station to drop off travellers.
- The problems along Bowes Road are recognised in the "Transport Assessment Final Document" drafted by Pell Frischmann, submitted with the application by Connected Living London.
- If these proposals are to be supported by the Council, it is imperative that a crossing at the library/clinic/swimming pool is provided on Bowes Road to mitigate residents' concerns about safety for pedestrians and cyclists. There is also a need to provide traffic calming to reduce the speed of vehicles. Crossing the road to these facilities is very dangerous at the moment and will get worse as a result of this application.

6.9.2 *Conservation Advisory Group*

The Group at their meeting on 10th March 2020 were supportive of the scheme, provided there was strict conditioning of materials.

6.9.3 *The Enfield Society (comments summarised):*

The Society accepts the need for additional affordable housing in the Borough and housing for rent. Our key consideration in looking at this application was the impact of the development on the adjacent Charles Holden designed Grade II Listed tube station. We consider that the scheme protects the views of this important landmark building and that the development will provide an improved setting compared to the existing car park arrangements. The Society supports the proposal. The Society is represented on the former Conservation Advisory Committee and note that that group was also broadly supportive of the scheme.

6.9.4 *Enfield Transport User Group (ETUG) (comments summarised):*

- Loss of parking will restrict access to the station for a very wide range of passengers, some of whose needs should be protected under the Equality Act
- Security and safety issues for people needing to park close to the station and who will now have to walk to their car
- Alternatives to driving are costly
- Increased waiting and travel time for residents as a result of needing to take taxis etc to station
- Loss of parking will impact on local residential streets (overspill into trying to find alternative places to park)
- Costs to widen CPZ may be passed onto residents
- The Piccadilly line will become inaccessible to many and likely to lead to a fall in commuter numbers on the line
- Insufficient parking is proposed for new tenants of the new housing.
- The lack of parking for residents in the proposed development at Arnos Grove is likely to create the same problems for residents in this proposed development. It is one thing to seek to discourage car use, quite another to seek to make life impossible for those who require cars for their everyday lives. People do not only travel to work and back or into town for social events and back; they travel across the UK. Many routes still remain difficult to traverse without a car. Orbital connections other than by car remain an enduring problem for those who live in outer London and the suburbs. The Mayor must stop treating residents as pariahs for

wishing to park at their homes. There needs to be proper provision made for car parking for residents before this proposal is approved.

6.9.5 *Southgate Green Association On Behalf of Southgate Green Study Group (comments, including updated comments summarised):*

- Southgate Green Association are generally in agreement with the proposal with the following reservations as set out below:
- The Bus interchange forms part of the planning application site, consideration should be given to improving the street scene in terms of planting, resurfacing materials, street furniture, street lighting including the replacement of the existing obtrusive cycle store with a unit more sympathetic to its surroundings. This could be accommodated by way of planning condition.
- Provision should be made for a drop off point for cars and taxis delivering passengers for the bus and tube. The interchange should facilitate customers arriving by all means of transport.
- The End flank wall to the residential block at the Eastern end of the site fronting onto Bowes Road projects too far forward of the general development line and is visually prominent. The design of this element requires further articulation and design merit to offer something of interest to the street frontage.
- We suggest that the A3 unit use classification should be widened to accommodate nursery school and community uses.
- The planning submission failed to take into consideration distant views from Arnos Grove and Arnos Park in terms of intrusive impact of the proposed building mass on the hillside and interruption of the treeline.
- We would have expected provision of on-site parking for the family dwelling accommodation.
- An opportunity exists to rectify the open party wall at the end of the retail terrace abutting the eastern end of the site this could be achieved by tree planting or a screen wall.

Update

- The bus interchange and bus stops should be included in any assessment, because the number of bus shelters and street furniture, pedestrian crossings etc all impacted on the significance of the listed station.
- Comments previously made in respect of drop-off for cars and taxis still stand. While restrictive aspirations of car ownership might apply to future occupiers of this site, transport hub users shouldn't be disenfranchised as a consequence.
- Block B01 remains dominant in the street scheme, and noticeable with the addition of gates.
- Suggest that the A3 unit classification should be widened to accommodate nursery school and community use. Question how existing mini-buses services for residents- will be accommodated (run by the Friern Barnet old Hospital site (Princess Manor).
- Comments in respect of views from Arnos Park and Pymmes Brook, near Waterfall Road still stand – the building will dominate the skyline. The arches are locally listed, and no views have been submitted.
- Question lack of parking for family housing – and staff parking, which was understood to be retained.

- Do not support the new high panel fence, which is not considered to be an improvement. Concerned that Holden's design will be diminished by the area of high fencing proposed.

6.10 Councillor Representations

6.10.1 *Councillor Bambos Charalambous MP – objection (comments summarised):*

- Would result in an overdevelopment within the Arnos Grove area, particularly bearing in mind the ongoing Ladderswood development of 517 new homes
- Development would place huge pressures on the current local infrastructure which could not be met. I am particularly concerned about the inevitable pressure on school places and GP surgeries
- The loss of parking at Arnos Grove station will impact hugely on nearby local roads as those who would use the car park are looking for parking elsewhere. There is a great concern of increased congestion in surrounding roads and increased difficulties for residents trying to park near their homes. This would inevitably impact on the quality of life for residents. Accessibility to the tube station for the disabled or those unable to access the station by other means of public transport would also be impacted.

6.10.2 *Councillor Daniel Anderson – objection (comments summarised):*

The proposed housing would be unaffordable to most Enfield residents:

- The median household income in Enfield is just £34,000, whilst the average salaries of key workers in London is just £27,000.
- 85% of households in the Borough earn less than £60k and so would be unable to afford even the 'affordable' rents.
- To therefore claim that the Discounted Market Rate homes will be 'meaningfully affordable to local front-line key workers (e.g. teachers and nurses)' is, though technically feasible it is not however borne out by the facts.
- What this development will instead bring is approximately 400 more residents into the locality. The local community therefore cannot be expected to support any developments that simply offer opportunities for those currently living in zones 1 and 2 who would be attracted to cheaper accommodation in zone 4.

Displaced parking onto residential streets:

- There is every likelihood that a 24/7 Controlled Parking Zone (CPZ) would be necessitated across much of the surrounding area. TfL should pay for the costs of a potential 24/7 CPZ at least for the next 5 years.

Increased congestion on Bowes Road:

- Arnos Grove Station already has a significant problem as a commuter drop-off point.
- The provision of 288 residents cycle parking spaces along with 22 station and visitor cycle parking spaces will not address this underlying issue. Therefore, in addition to the above concerns about commuter parking, commuter drop-off/pick-up is likely to increase and so lead to more congestion in the area.

Bad for the environment:

- Many more residents. rather than pay for parking permits a 24/7 CPZ, will instead concrete over their gardens to create driveways, which will lead to further drainage problems, such as flash flooding, already identified as an increased risk by the Environment Agency, thereby working against the environment and worsening the effect of climate change.

Risk Arnos Grove Station's iconic status:

- Any development of the car parks will undermine Arnos Grove Station's iconic Grade II Star Listed status by ruining its spacious appearance with developments on either side.

Consultation/Planning Application process, particularly during Pandemic

- Object to the progression of this controversial development during the height of a pandemic. Many of those car park users likely to be impacted by the development are presently, like many working from home, and will, therefore, be unaware of the planning application.

Online petition is referenced: <https://www.change.org/p/sadiq-khan-let-s-stop-tfls-proposed-development-of-the-carparks-at-arnos-grove-station>

6.11 Statutory and Non- Statutory Consultees

6.11.1 *Better Streets for Enfield:*

We support this development. We think that removing the car park will encourage more sustainable travel patterns to the station, and having seen the data, we are satisfied that those alternatives exist for users of the station. These new homes with no car parking except for disabled residents, with plentiful bike parking and a great level of public transport access, will help support residents in the car-free lifestyle that we need to see increasing across Enfield with its growing population.

The development will also provide a new public square, helping to improve the public realm in Arnos Grove to the benefit of other residents and visitors.

Please ensure that this sustainable development is approved (8.10).

6.11.2 *Economic Development:* No comment

6.11.3 *Environmental Health Team:* No objection raised. Conditions pertaining to contaminated land and air quality required. (8.15, 8.16)

6.11.4 *Education:* No objection raised however are seeking financial contribution within the scope of the s106 to mitigate the estimated impact arising from additional child places that will be needed (8.17)

6.11.5 *Housing Renewal:* No comment

6.11.6 *Highways Team:* No comment

6.11.7 *Parks Team:* No comment

6.11.8 *Regeneration Team:* No comment

- 6.11.9 *SuDS/Flooding/Drainage*: No objection subject to conditions requiring Sustainable Drainage Strategy (pre-commencement other than for Enabling Works) and Verification Report. (8.12)
- 6.11.10 *Traffic and Transportation Team*: No objection.
- 6.11.11 *Waste Management*: No comment. (8.14)
- 6.11.12 *Energetik*: Discussions are ongoing between the applicant and the Council's District Heat Network (DHN) setup company 'Energetik' with the intention of confirming that the development will link up to the network (noting that the development has been designed to be able to do so). Should a connection to the DHN prove unfeasible and/or unviable the applicants will move to their reserve strategy (as outlined in the planning application) which assumes an Air Source Heat Pump based solution. (8.13)
- 6.11.13 *Healthy Urban Development Unit / NHS (HUDU)*: Have identified that the development will have an impact on local healthcare services, particularly primary healthcare services and infrastructure and as such asked for a financial contribution of £70,595. The applicants have agreed to this payment which is secured in the s106 agreement.
- 6.11.14 *London Borough of Barnet (Objection)*:
The development would result in the removal of existing commuter car parks on the site and could, therefore, without mitigation result in an unacceptable impact on highway conditions within the London Borough of Barnet as a result of displaced commuter car parking. The proposal also fails to identify or propose any mitigation measures to account for the increased pressures, for example on school places, that would be likely to result on key infrastructure within the London Borough of Barnet.
- 6.11.15 *London Fire Service*: No objection. (8.19)
- 6.11.16 *London Underground Infrastructure Protection*: No objection, subject to the applicant fulfilling their obligations in terms of legal requirements.
- 6.11.17 *Metropolitan Police Service (Designing Out Crime)*: No objection subject to condition.
- 6.11.18 *Thames Water*: No objection raised.
- 6.11.19 *Transport for London (Planning)*: No objection raised.
- 6.11.20 *Historic England*: No objection.
- 6.11.21 *Greater London Archaeology Advisory Service (GLAAS)*: No objection.
- 6.11.22 *Environment Agency*: No objection.
- 6.11.23 *Natural England*: No objection.
- 6.11.24 *GLA (Stage 1 response) (summarised)*:

Principle of development: The proposal to introduce residential use to this underutilised site responds positively to London Plan and the Mayor's intend

to publish London Plan policies to increase housing supply and optimise sites, which is supported.

Housing: 40% affordable housing by habitable room and unit is proposed as affordable housing, split 30%/70% London Living Rent/Discount Market Rent exceeds the 35% threshold for the Fast Track Route and so is strongly supported. Grant funding must be investigated and further detail on the Discount Market Rent unit income thresholds should be provided before the proposal can be considered under the Fast Track Route. If eligible for the Fast Track Route, an early stage review must be secured. The unit sizes by affordable housing tenure should be provided, with a preference for larger units to be provided at LLR levels.

Urban design and heritage: The development would have a high quality of design and architecture. A fire evacuation lift should be provided within each building core. The proposal would enhance the setting and historic and architectural significance of the Grade II listed Arnos Grove station; as such no harm is caused to the listed building.*

Transport: Further information is required on electric vehicle charging points provision, a car parking management plan, cycle parking, pedestrian and public realm safety improvements, the demarcation of pedestrian routes and a detailed proposal for the public transport interchange. Relevant conditions and obligations should also be secured (paragraphs 56-73).

Energy, water and urban greening:

Carbon performance and offsetting: The applicant should revise their Be Lean strategy for non-domestic use as the target on-site carbon savings have not been met. The proposed Be Green strategy can be further improved in line with the London Plan. The revised carbon emissions spreadsheet should be submitted for all stages of the energy hierarchy.

For the non-domestic element of the proposed development, the applicant is expected to meet a target of a minimum 15% improvement on 2013 Building Regulations from energy efficiency. The applicant is required to consider additional energy efficiency measures to achieve greater carbon savings at the Be Lean stage.

Overheating/cooling strategy: The applicant should consider and provide a revised model representing a robust strategy that can reduce the need for active cooling and ensure that thermal comfort can be met in all units under realistic conditions. Before a discussion is held, the applicant should present a tailor made solution for the development. Further justification on an effective overheating/cooling strategy is required.

DEN connection: The discussions with the DHN operator and the applicant are still on-going. Connecting to the proposed Arnos Grove district heating network would provide 51 tonnes CO2 savings per annum, being the essential part of the energy strategy. Therefore, discussions with the operator should continue to demonstrate that the connection is being actively pursued. A condition on this should be applied.

Update

6.11.25A further updated response was received from the GLA in September 2020 confirming that outstanding matters had been resolved other than the provision of fire evacuation lifts in the buildings and further investigation into an effective overheating/cooling strategy (i.e. thermal comfort for future occupiers of the development); and for the non-domestic element of the proposal to meet a target of a minimum 15% improvement on 2013 Building Regulations from energy efficiency. (Conditions pertaining to these matters are recommended by Officer's).

6.11.26 *Design Review Panel:*

The scheme was presented to Enfield's Design Review Panel in September and December 2019. The DRP meetings followed from a series of pre-application meetings where the Council's design and planning officers discussed the overall bulk, scale and massing with the applicant, as well as principles for materiality and relationship with the surrounding built context.

The main points from the Panel's latter response is summarised as follows:

- Overall it was felt that the scheme had developed in the time between reviews and that the height and scale was appropriate for the surrounding context of low rise suburbia and shopping parade;
- Entrance frontages that were flanked or primarily fronted with refuse stores and bike sheds were not supported as these created blank or inactive frontages;
- The panel accepted that the constraints of the site meant the (previously proposed) gable end building along the street frontage was now absent from the scheme (since the last review) but accepted that the various requirements of the site meant it was difficult to deliver;
- Blocks B01 and B02 felt more unresolved and the panel were not convinced by the massing strategy on B01 as it could be blocking views of the station drum from the Eastern approach. It was suggested to pull it back from the street in order to allow a better view of the drum;
- The panel were not clear on the purpose of rear garden / entrance area of B02, i.e. private amenity or communal garden? There was also concern with the gating of the western street to enclose the TfL staff parking and the location of bike and refuse stores;
- The panel encouraged the design team and client to continue pushing to create a new access route to Walkers Close to allow access to Arnos Park and at least safeguard a route on site both for pedestrians and for trackside vehicle access;
- In relation to heritage overall the approach of consistent "background" buildings continued to be supported. The Panel also supported the principle of protecting the silhouette and shape of the drum by working to not place buildings behind it; and
- Lastly, in relation to heritage the approach to materials was considered interesting with the potential to develop a unique and positive interpretation of the local palette of materials, the Holden style and art deco references noted.

6.11.27 *Planning Committee Pre-application / Technical Briefing:* The proposal was presented to Planning Committee Members on the 5th November 2019. This was a technical briefing rather than a discussion forum and enabled Members to seek further information in relation to technical detail and/or clarification where needed.

7.0 POLICY

The London Plan – Existing and Intend to Publish

- 7.1 The scheme has been assessed against policies in both the existing and London Plan (Intend to Publish). As the London Plan (Intend to Publish) has been subject to a full examination and is close to adoption, it can be given substantial material weight however it is noted that in the London Plan, as with all policy, there are often tensions between individual and over-arching policies. This would be the case in relation to taller buildings and density for example; whereby policies may be simultaneously advising against height whilst also requiring density to be delivered, and not every site will be able to comply with these requirements. As such in these instances the Local Planning Authority seeks to weigh up the overall wider benefits of a scheme whilst determining the key requirement that the scheme should deliver. Whilst the consistent aim across policy is the requirement to deliver housing at the required level, the tension in policy terms often lies with how that is delivered.

The London Plan 2016

- 7.2 The London Plan is the overall strategic plan for London setting out an integrated economic, environmental, transport and social framework for the development of London for the next 20-25 years. The following policies of the London Plan 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 7.14: 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 woodland

Intend to Publish London Plan 2020

- 7.3 The Examination in Public (EiP) on the new London Plan was held between 15th January and 22nd May 2019. On the 9th December 2019, the Mayor issued to the Secretary of State his intension to publish the London Plan. On 13 March 2020, the Secretary of State issued Directions to change a number of proposed policies – as identified by (*) in the list below. 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.
- 7.4 Whilst the London Plan (2016) remains, given the advanced stage that the Intend to Publish version of the London Plan has reached, the emerging document holds significant weight 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.
- 7.5 The following London Plan (Intend to Publish) policies are considered particularly relevant:
- 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
- D13: Agent of Change: *Identifies that the responsibility for mitigating impacts from existing noise and other nuisance-generating activities or uses sits with the proposed new noise-sensitive development, for example if a new residential development is proposed near to an existing noise generating use then the onus lies with the proposed development to ensure noise mitigation measures are incorporated into the design rather than expecting the existing noise generating use to stop or reduce.*
- D14: Noise
- E3: Affordable Workspace
- E11: Skills and Opportunities for All
- H1: Increasing Housing Supply (*):
Sets new ambitious targets for housing completions. Enfield's ten-year housing target will now be 18,760 (previous target 7,976 for the period 2015-2025).
- H4: Delivering Affordable Housing
- H10: Housing Size Mix (*)
- H11: Build to Rent: *Takes a positive approach to Build to Rent developments (which satisfy criteria) noting that Build to Rent can contribute to the delivery of new homes.*
- 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

- 7.6 Enfield's Local Plan comprises the Core Strategy, Development Management Document, Policies Map and various Area Action Plans as well as other supporting policy documents. Together with the London Plan, it forms the statutory development policies for the borough and sets out planning policies to steer development according to the level it aligns with the NPPF. Whilst many of the policies do align with the NPPF, London Plan (2016) and London Plan (Intend to Publish), it is noted that these documents do in places supersede the Local Plan in terms of some detail and as such the proposal is reviewed against the most relevant and up-to-date policies within the Development Plan.

Local Plan – Core Strategy

- 7.7 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.
- 7.8 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 9:	Supporting Community Cohesion
Core Policy 17:	Town Centres
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
Core Policy 44:	North Circular Area
Core Policy 45:	New Southgate

Local Plan - Development Management Document

7.9 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.

7.10 The following local plan Development Management Document policies are considered particularly relevant:

DMD 1:	Affordable Housing on Sites Capable of Providing 10 units or more
DMD 3:	Providing a Mix of Different Sized Homes
DMD 6:	Residential Character
DMD 8:	General Standards for New Residential Development
DMD 9:	Amenity Space
DMD 10:	Distancing
DMD 28:	Large Local Centres, Small Local Centres and Local Parades
DMD 37:	Achieving High Quality and Design-Led Development
DMD 38:	Design Process
DMD 43:	Tall Buildings
DMD 44:	Conserving and Enhancing Heritage Assets
DMD 45:	Parking Standards and Layout
DMD 47:	New Road, Access and Servicing
DMD 48:	Transport Assessments
DMD 49:	Sustainable Design and Construction Statements
DMD 50:	Environmental Assessments Method
DMD 51:	Energy Efficiency Standards
DMD 52:	Decentralized Energy Networks
DMD 53:	Low and Zero Carbon Technology
DMD 54:	Allowable Solutions
DMD 56:	Heating and Cooling
DMD 57:	Responsible Sourcing of Materials, Waste Minimisation and Green Procurement
DMD 58:	Water Efficiency
DMD 59:	Avoiding and Reducing Flood Risk
DMD 60:	Assessing Flood Risk
DMD 61:	Managing surface water
DMD 62:	Flood Control and Mitigation Measures
DMD 64:	Pollution Control and Assessment
DMD 65:	Air Quality
DMD 66:	Land Contamination and instability
DMD 68:	Noise
DMD 69:	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
DMD 79:	Ecological Enhancements
DMD 80:	Trees on Development Sites
DMD 81:	Landscaping

North Circular Area Action Plan

- 7.11 The North Circular Area Action Plan (NCAAP) sets out a planning framework for the sets out a planning framework for the future of the North Circular corridor between the A109 at Bounds Green and the A10 Great Cambridge Road. The adopted NCAAP forms an integral part of the Local Plan, sitting alongside the adopted Core Strategy (2010), the adopted New Southgate Masterplan (2010), the adopted Development Management Document (DMD, (2014), and other area based plans being prepared for Enfield's strategic growth and regeneration areas. The NCAAP provides more detailed and area-specific policy and framework for this part of the borough. New development proposals coming forward within the area are expected to accord with the policies and proposals unless other material planning considerations indicate otherwise. Of particular relevance to this application are policies NC Policies 2, 6, 8, 9 and 17 which are summarised as follows:
- 7.12 NC Policy 2 'New and Refurbished Homes' identifies 20 sites within the NCAAP area which have the potential to deliver approximately 1,400 new homes within the plan period up to 2026.
- 7.13 NC Policy 6 'High Quality Design of New Development' states that new development within the NCAAP area will be high quality and design led...taking careful account of urban context and reinforcing local distinctiveness. In relation to Arnos Grove station the policy states that the character of the area is suburban and generally low to medium density and new development will have a significant impact on townscape and as such should have a design-led approach.
- 7.14 NC Policy 8 'Transport and Movement' in the NCAAP Area notes that Arnos Grove station has commuter parking either side of the station building and these sites are identified for potential redevelopment. The policy further notes that the suitability of these sites for redevelopment will depend on their role in providing commuter parking in this location.
- 7.15 NC Policy 9 'Environmental Mitigation – Air Quality and Noise Pollution' notes that in relation to air quality the design of new developments and their associated landscaping proposals can significantly help in the mitigation of environmental problems such as air and noise pollution.
- 7.16 NC Policy 17 sets out that the site has the potential to be released for redevelopment whilst also making clear that any new development would need to respect the setting of the listed building. The policy further notes that new development "should take account" of four criteria, including the site layout (Part 1) and the estimated site capacity (Part 4), but these are not absolute requirements.

Enfield Draft New Local Plan

- 7.17 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.
- 7.18 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 policy H2 (Affordable housing) which sets out a strategic target that 50% additional housing delivered across the borough throughout the life of the plan will be affordable; policy H4 (Housing mix) which identifies the borough’s needs for homes of different sizes and tenures; and H5 (Private rented sector and build-to-rent) which sets out that the Council will seek to maximise the supply of housing in the borough by, amongst other things, supporting proposals for standalone build to rent developments.

National Planning Policy Framework (February 2019)

- 7.19 The National Planning Policy Framework (NPPF) introduces a presumption in favour of sustainable development. In this respect, sustainable development is identified as having three dimensions - an economic role, a social role and an environmental role. For decision taking, this presumption in favour of sustainable development means:
- a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
 - b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being; and
 - c) an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.
- 7.20 The NPPF recognizes that planning law requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise. The NPPF does not change the statutory status of the development plan as the starting point for decision making.
- 7.21 In relation to achieving appropriate densities paragraph 122 of the NPPF notes that planning policies and decisions should support development that makes efficient use of land, whilst taking into account:
- a) the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;
 - b) local market conditions and viability;

- c) the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;
- d) the desirability of maintaining an area's prevailing character and setting (including residential gardens), or of promoting regeneration and change; and
- e) the importance of securing well-designed, attractive and healthy places.

7.22 Paragraph 48 of the NPPF details when weight may be given to relevant emerging plans. This guidance states that the stage of preparation, the extent to which there are unresolved objections and the degree of consistency of relevant policies to the Framework are relevant.

National Planning Practice Guidance (NPPG)

7.23 The Government published NPPG sets out further detailed guidance on the application of policies set out in the NPPF. NPPG guidance covers matters such as decision making, planning conditions and obligations, EIA, the historic and natural environment and design.

Other Material Considerations

7.24 The following guidance is also considered particularly relevant:

- New Southgate Masterplan (2010)
- Enfield Biodiversity Action Plan
- Enfield Characterisation Study (2011)
- Enfield S106 SPD (2016)
- Enfield Decentralised Energy Network Technical Specification SPD (2015)
- Making Enfield: Enfield Heritage Strategy 2019-2024 SPD (2019)
- 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: Shaping Neighbourhoods: Play and Informal Recreation SPG (2012)
- GLA: Shaping Neighbourhoods: Character and Context SPG (2014)
- 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: Social Infrastructure SPG (2015)
- GLA: Housing SPG (2016)
- GLA: Homes for Londoners: Affordable Housing and Viability SPG (2017)
- Mayor's Transport Strategy (2018)
- GLA Threshold Approach to Affordable Housing on Public Land (2018)
- Healthy Streets for London (2017)
- Manual for Streets 1 & 2, Inclusive Mobility (2005)
- National Design Guide (2019)
- Enfield Climate Action Plan (2020)
- Enfield Housing and Growth Strategy (2020)

8.0 Material Planning Considerations

8.1 The main planning issues raised by the Proposed Development are:

1. Principle of Development (Land Use) (Para. 8.2)
2. Housing Need and Delivery – (Para. 8.3)
3. Density and Dwelling Mix – (para. 8.4)
4. Housing Mix – (para. 8.5)
5. Residential Quality and Amenity – (para. 8.6)
6. Design – (Para. 8.7)
7. Heritage – (Para. 8.8)
8. Neighbouring Amenity – (Para. 8.9)
9. Transport – (Para. 8.10)
10. Trees – (Para. 8.11)
11. Water Resources, Flood Risk and Drainage – (Para. 8.12)
12. Environmental Considerations – (Para. 8.13)
13. Waste Storage – (Para. 8.14)
14. Contaminated Land – (Para. 8.15)
15. Air Quality / Pollution – (Para. 8.16)
16. Socio-economics and Health – (Para. 8.17)
17. Education – (Para. 8.18)
18. Fire Safety – (Para. 8.19)
19. Equality – (Para. 9.0)
20. Community Infrastructure Levy – (Para. 10.0)
21. Conclusion – (Para. 11.0)

8.2 Principle of Development (Land Use)

- 8.2.1 In terms of the overarching principle of development it is useful to note that 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.
- 8.2.2 Running alongside this is the aim that planning should facilitate the delivery of sustainable development. This is achieved by ensuring that the right development is built on the right land; that development helps to support communities with sufficient homes, accessible services, and open spaces; and development protects and where appropriate, enhances the natural, built and historic environment.
- 8.2.3 With regards to the existing land use, it is noted that the NPPF (Para. 118) 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.
- 8.2.4 Meanwhile paragraph 1.2.5 of the London Plan (Intend to Publish) notes that 'all options for using the city's land more effectively will need to be explored as London's growth continues, including the redevelopment of brownfield sites and the intensification of existing places, including in outer London'. Furthermore, Policy GG2 requires development to prioritise sites that are well-connected by public transport, particularly for intensifying the use of brownfield land and delivering additional homes.

Comprehensive Redevelopment

- 8.2.5 The scheme proposes the redevelopment of the site, which comprises two existing car parks (Sites A and B). The existing car parks provide no architectural interest to the area nor do they contribute towards enhancing the Grade II* listed station and its setting.
- 8.2.6 The site is situated within the New Southgate Place shaping area and is also within the North Circular Area Action Plan Area (2014). The potential for development was set out in adopted Enfield development plan policy – specifically, within the North Circular Area Action Plan (2014).
- 8.2.7 The site is identified as an ‘opportunity site’ within the North Circular Area Action Plan (NCAAP), within NC Policy 2 (Opportunity Site 7). NC Policy 17 also sets out that the site has potential to be released for redevelopment. The principle of development on this site is therefore supported. NC Policy 17 Arnos Grove Station states the site has potential to be released for redevelopment, and that new development would need to respect the setting of the Grade II listed station building, and that respecting the setting of the station could be achieved by setting the building line of new development back so that views from the local centre are not interrupted.
- 8.2.8 The policy provides indicative housing numbers and design options, which have been assessed in this report in the context of present-day considerations, adopted and emerging policies and other material considerations. The NCAAP pre-dates the current adopted London Plan (2016) and emerging London plan (ItP) housing targets.
- 8.2.9 This area is identified as a place shaping priority area / regeneration priority area. Core Policy 44 ‘North Circular Area’, and Core Policy 45 ‘New Southgate’ are relevant policy considerations. Enfield adopted Core Strategy (2010) Core Policy 44 North Circular Area states that the Council will promote housing improvements and investments. It recognises that housing estimates may need to be revised following further detailed work as part of the AAP and New Southgate Masterplan. It also indicates that new development will be expected to cross-fund environmental improvements in the area such as landscaping and tree planting. Core Policy 45 New Southgate sets out the objectives for this place shaping priority area. It indicates that a holistic integrated approach should be taken to development and that street based urban design solutions should be employed.
- 8.2.10 Whilst it is acknowledged there will be a loss of car parking the development will promote imminently important aims such as sustainable development and sustainable modes of transport, delivering housing in a location identified as an opportunity site in Enfield’s adopted development plan. The potential for housing at this location has been indicated, as part of Enfield’s currently adopted development plan.
- 8.2.11 The principle of the development is acceptable subject to further detailed assessment below an appropriate suite of conditions and planning obligations.

a) Residential Use

- 8.2.12 The benefits of delivering housing on an underutilised brownfield site in a highly accessible location (directly adjacent to a tube station), partially within and directly adjacent to a designated local centre (Arnos Grove Local Centre) has strong planning policy support and should be afforded substantial weight in the determination of the application. The site is uniquely situated directly adjacent to a tube station – providing a very robust case for a car-free development.
- 8.2.13 With specific regard to the residential element of the proposal, it is noted that the NPPF sets out the government's objective to boost the supply of homes. The NPPF also states an intention to ensure that supply meets the needs of different groups in the community, including an affordable housing need. Policy GG4 of the draft London Plan supports this intention, stating that planning and development must 'ensure that more homes are delivered'.
- 8.2.14 Policy H1 of the draft London Plan (ItP) notes the importance of encouraging residential development on appropriate windfall sites, especially where they have a high PTAL rating (ratings 3 to 6) or are located within 800m of a tube station. The Council's Core Strategy (4.1 Spatial Strategy), identifies that 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.
- 8.2.15 The Mayor's Affordable Housing and Viability SPG sets out the intention to bring forward more public land for affordable homes. Paragraph 4.4 of the SPG outlines the benefits of Build to Rent (BtR) developments noting these: attract investment into London's housing market that otherwise would not be there, particularly since Build to Rent is attractive to institutional investors seeking long-term, inflation-tracking returns; accelerate delivery on individual sites as they are less prone to 'absorption constraints' that affect the build-out rates for market sale properties; more easily deliver across the housing market cycle as they are less impacted by house price downturns; provide a more consistent and at-scale demand for off-site manufacture; offer longer-term tenancies and more certainty over long-term availability; ensure a commitment to, and investment in, place making through single ownership; and provide better management standards and higher quality homes than other parts of the private rented sector. Build to Rent is considered in greater detail below.
- 8.2.16 NPPF (Paragraphs 102 and 103) sets out objectives for considering transport issues in the planning process, including ensuring opportunities to promote walking, cycling and public transport, and requires development be focused on locations which are sustainable and can offer a range of transport modalities to help reduce congestion and emissions and improve air quality and public health. The development site is in a highly accessible and sustainable location (directly adjacent to a tube station), immediately adjacent to an underground station with a bus interchange immediately at the front of the site.
- 8.2.17 The proposal is for 162-residential units on a site where the adopted development has identified potential to introduce new housing (NCAAP). The Boroughs housing delivery targets have been set by the GLA and the Draft London Plan states that Enfield is required to provide a minimum of 12,460 homes over the next 10 years (1,246 per annum), in comparison to the previous target of 7,976 for the period 2015-2025.

- 8.2.18 According to the Enfield Housing Trajectory Report (2019), during the previous 7-years the Borough has delivered a total of 3,710 homes which equates to around 530 homes per annum. Furthermore, given the new target of 1,246 per annum the borough needs to optimise all options in terms of housing delivery, particularly on existing brownfield sites and transport hubs, as is the case here.
- 8.2.19 The Council is currently updating its Local Plan and through publishing the Issues & Options (Regulation 18) last year has been transparent about the sheer scale of the growth challenge for Enfield. The published Regulation 18 document was clear about the need to plan differently to attain a significant step change in delivery and secure investment in our borough. The council needs to encourage a variety of housing development including market, affordable and Build to Rent products, as is proposed here, in order to meet varied local demand.
- 8.2.20 In terms of national policy, the provision of housing on underutilised brownfield sites in highly accessible locations is in line with the NPPF principles in respect of sustainable development (social, economic and environmental). This approach is also in line with the adopted and draft London Plan's which supports the optimisation of underutilised and highly accessible brownfield sites. It is also aligned with a plan-led approach to directing density and scale to sites where new resident populations can most sustainably be supported.
- 8.2.21 In relation to sustainable development the proposal is considered to respond to the objectives of the NPPF by redeveloping a brownfield site; by providing homes that are highly accessible site (directly adjacent to a tube station) and easily accessible to local amenities; by providing a range of housing to support a mixed and balanced community; and by having due regard to the local natural, built and historic environment. It is also considered that the proposed number of residential units on the site would contribute to providing housing to assist in meeting the borough's housing target and help bridge the shortfall that has been the case in previous years.

Loss of Existing Car Park / introducing a Compatible Land Use

- 8.2.22 The loss of the existing car park (Sites A and B) is a key planning consideration in the assessment of the proposal. The proposed site adjoins a tube station and bus interchange and as such, as indicated above makes it a sustainable place to live. The applicants have carried out comprehensive surveys of the use of the existing car park and have concluded that a clear majority of drivers have alternative forms of public transport available to them. The applicants' surveys also indicate that most people live within walking distance of another London Underground station or National Rail station.
- 8.2.23 As mentioned above, in terms of national policy the provision of housing on underutilised brownfield sites in highly accessible locations and to increase densities, is a key driver within the NPPF 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. This approach is also in line with the draft London Plan's direction of travel which is to optimise underutilised brownfield sites.

- 8.2.24 Policy H1 of The London Plan (Intend to Publish) advocates for housing delivery to be optimised on sites that have good public transport accessibility (with a PTAL rating of 3-6), and mixed-use redevelopment of car parks and public sector owned sites. This approach is also supported in the council's Issues and Options document which identifies the need to intensify development areas around key overground and underground rail stations. The document further identifies redeveloping underutilised and low-density land such as surface car parks whilst also recognising the need to 'genuinely commit to deliver sufficient new housing to address our needs', for example related to size and tenure.
- 8.2.25 Running alongside this is the high quantum of our Borough (around 40%) that is designated Green Belt, which results in specific challenges in terms of the provision of substantial development, such as the proposal under consideration here. As Policy G2 of The London Plan restricts development in the Green Belt in accordance with the NPPF, opportunities for the provision of housing are restricted which means the utilisation of inefficiently used brownfield sites becomes a priority.
- 8.2.26 The existing car parks give rise to a degree of existing amenity impacts on adjoining properties due to the incompatibility of car parking located to the rear of existing homes. These include noise, air quality and disturbance to the rear of existing homes. The proposals would introduce a compatible land use, residential, in this location – beneficially reducing immediate noise, air quality and disturbance to rear of homes along Brookdale, Walker Close and Arnos Road.
- 8.2.27 Given the site is considered to be underutilised in terms of use and is in a well-connected transport node, Officers are satisfied that the loss of the existing car park has been appropriately justified in land use planning policy terms and is in accordance with the above policies.

Commercial Floorspace Provision

- 8.2.28 DMD Policy 28 notes that in relation to 'local centres' the Council will seek to protect and improve the provision of day-to-day goods and services to meet the local needs of residents in the local neighbourhood. The scheme seeks to provide an 89 sq.m commercial unit at the front of building A01, facing out onto the proposed new public square. The applicants are seeking to secure a multiple use permission for the unit in order to maximise the opportunity to find a suitable tenant. The proposed use is A1 (Shops) / A3 (Restaurants and cafes) / A4 (Drinking establishments) which is considered suitable for the site.
- 8.2.29 In consideration of the above, the loss of the existing car park is considered acceptable in this instance as the redevelopment of the Site to provide housing is aligned with existing and emerging policy and local, regional and national level. In addition, the development will provide policy compliant (40% based on habitable rooms) levels of affordable housing which will be secured by way of a Section 106 agreement. The provision of Affordable Housing is a key priority for the council and as identified elsewhere in this report, given the high levels of Green Belt in the Borough, brownfield sites such as this are needed to provide housing which the Borough is currently under-providing, particularly Affordable Housing.

Suitability of the site for Build to Rent housing

- 8.2.30 The Site is allocated as an area for regeneration and the delivery of housing in the Core Strategy and as part of the North Circular Area Action Plan. The site has potential to contribute towards the current shortfall in housing delivery within the Borough, particularly in relation to affordable housing.
- 8.2.31 The Affordable Housing and Viability SPG highlights that Build to Rent can be particularly suited to development in town centres or near transport nodes. The Application site is located at a highly accessible, and underutilised brownfield site on the edge of Arnos Grove local centre, and at a transport node.

Summary of Principle

- 8.2.32 Given the above considerations, the principle of development is considered to be acceptable and in line with relevant policies, most notably London Plan Policy G2, Intend to Publish Policies GG2, GG4, H1 and H11, Core Strategy Policy 4.1, DMD Policy 28, the Mayor's Affordable Housing & Viability SPG and Paragraphs 59, 102 and 105 of the NPPF. As such the Development is supported in principle terms subject to other detailed considerations as discussed below.

8.3 Housing Need and Delivery

- 8.3.1 The current London Plan sets a target for the provision of 49,000 new homes across London each year. This target is set to increase in the draft London Plan (Intend to Publish) with Policy H1 stating an overall target for the provision of 52,287 new homes each year. Whilst Enfield's 2019 Housing Action Plan recognises that the construction of more affordable high-quality homes is a clear priority, only 51% of approvals in the Borough have been delivered over the previous 3-years.
- 8.3.2 The draft London Plan (ItP) identifies a need for a minimum of 1,246 dwellings per year to be delivered over the next 10-years in the Borough, based on the Strategic Housing Market Assessment (SHMA): an increase over the current target of 798.
- 8.3.3 Enfield's Housing and Growth Strategy (2020) was considered by Cabinet in January 2020 and approved at February's Council meeting (2020) and sets out the Council's ambition to deliver adopted London Plan and Core Strategy plus ambitious draft London Plan targets.
- 8.3.4 The Strategy sets five ambitions, the third of which is 'Quality and variety in private housing'. The key aims of the Strategy seek to address the housing crisis within the Borough. During consideration of the Cabinet report Members discussed the current housing situation and highlighted the rise in private sector rents in proportion to the average salary and the significant rise in homelessness. Enfield had one of the highest numbers of homeless households in the country. Insecurity and unaffordability of private sector housing has evidence-based links with homelessness. One of the most common reason for homelessness in London is currently due to the ending of an assured tenancy (often by buy to let landlords). MHCLG (2018) data shows a significant increase in the number of households in Enfield using temporary accommodation – with a significant 67% increase between 2012 and 2018.

- 8.3.5 The fourth and fifth ambitions of the strategy are in respect of Inclusive placemaking; and accessible housing pathways and homes for everyone. While the Housing and Growth Strategy is not a statutory document it sets the Council's strategic vision, alongside metrics, in respect of housing delivery. It was approved at a February 2020 Council meeting. Its evidence, data and metrics are considered relevant material considerations.
- 8.3.6 The 2018 London Housing SPG outlines a vision that delivers high quality homes and inclusive neighbourhoods by ensuring that appropriate development is prioritised. Policy H1 of the draft London Plan (ItP) seeks housing delivery to be optimised on sites that have good public transport accessibility (with a PTAL 3-6 rating).
- 8.3.7 As mentioned elsewhere in this report, Enfield is a celebrated green borough, with close to 40% of our borough 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. The reality of these land designations means the call on optimisation of our brownfield land is greater and brings complex development issues and a major shift in how Enfield's character will need to transform.
- 8.3.8 Taking into account both the housing need of the borough together with the track record of delivery against target, it is clear that the council must seek to optimise development on brownfield sites, particularly those that are currently not being optimised.

Build to Rent

- 8.3.9 Build to Rent is supported in planning policy nationally, and regionally in London. Published London Plan (2016) Policy 3.8 provides support for Build to Rent. Draft London Plan (ItP) Policy H11 supports Build to Rent housing. The supporting text for the policy supports boroughs in taking a positive approach to Build to Rent – so it can better contribute to the delivery of new affordable homes. Draft London Plan (ItP) Policy H11 sets several criteria for what can qualify as Build to Rent (see below). Policy H11 also states that affordable housing can be entirely Discounted Market Rent (DMR), where it fulfils the definition of Policy H11 (Part B). The Mayor of London's Housing and Viability SPG (2017) provides specific guidance in respect of Build to Rent, including on viability.
- 8.3.10 Adopted Enfield Local Plan policies (Core Strategy and Development Management Document) are silent on Built to Rent, which is a relatively new housing type. Key relevant strategic policies and guidance (LP 3.8, LP(ItP) H11 and Affordable Housing and Viability SPG) have been adopted, or emerged, following adoption of Enfield's Core Strategy (adopted in 2010) and the DMD (adopted in 2014).
- 8.3.11 The Council's New Local Plan Issues and Options consultation document (2019/2020) signals an intention to include a policy that support Build to Rent. While this document has limited weight Paragraph 5.6.5 of that consultation document states *"The Council supports Build to Rent and will positively promote this housing product through policy making, to support the delivery of the high quality, secure homes that Enfield residents need, in accordance with the London Plan and Mayor's SPG on Affordable Housing and Viability."*

Build to Rent criteria

8.3.12 All 162 of the proposed units (or 466 habitable rooms) are Build to Rent. Table 1 below sets out the management and tenancy terms offered – against the criteria required by draft London Plan Policy H11 (ItP) – and how the proposed development would meet, and in some cases exceed, those criteria.

Table 1

Management and tenancy topic / criteria	Proposal	Commentary	Build to Rent LP (ItP) Policy H11 and AH and Viability SPG
Management Body	Connected Living London	Homes will be held in unified ownership and will be professionally managed by CLL with daily on-site presence.	Complies with policy H11(B)(5) and H11(B)(8)
Tenancy Type	1-5 Year AST	All tenants will be offered a tenancy of up to 5 years. This exceeds Draft London Plan requirements.	Complies and exceeds the requirements of policy H11(B)(6)
Annual Rent Increases	Increases Formula Linked	Rent certainty will be provided to tenants for the period of their tenancy by clearly setting how annual rent increases will be calculated in the tenancy agreement.	Complies with policy H11(B)(7)
Letting Fees	None	No upfront letting fees will be charged to tenants. Deposits will be held securely in an appropriate Deposit Protection Scheme.	Complies with policy H11(B)(10)
Service Charges	None	All rents will be inclusive of service charges.	Complies with policy H11(B)(7) and DMR/LLR requirements
Covenant Length	15 Years	The private homes will be required to be retained in rental use for 15 years. Affordable housing in perpetuity.	Complies with policies H11(A) and H11(B)(2)
Covenant Clawback	Clawback Mechanism	A clawback mechanism will ensure there is no financial incentive to break the covenant. The mechanism will follow the Formula set out in the GLA's Affordable Housing SPG (2017).	Complies with policy H11(B)(3)
Housing numbers and containment	162 self-contained homes	162 self-contained homes (466 rooms) with all units self-contained and let separately.	Complies with policy H11(B)(1) and H11(B)(4)
Tenant Break	1 Months' Notice (After 6 Months)	A tenant only break will allow tenants to end the tenancy with a months' notice after 6 months.	Complies with SPG management standards (5)

- 8.3.13 The proposal complies with draft London Plan (ItP) Policy H11(A) and the 11 parts of London Plan (ItP) Policy H11(B).
- 8.3.14 Housing quality is another important criterion in considering a Build to Rent scheme. The Mayor of London's Homes for Londoners: Affordable Housing and Viability SPG sets out design quality criteria (Part 4) in respect of Build to Rent schemes (the SPG sets five key principles for assessing a Build to Rent scheme). The SPG highlights the importance of achieving good quality development to support high quality Build to Rent developments. A detailed assessment of the design element of the scheme is set out below.

Summary of Build to Rent

- 8.3.15 The proposed development would support Ambitions 1, 3, 4 and 5 of Enfield's 'Housing and Growth Strategy' (2020), endorsed by Council's cabinet (January 2020) and agreed at Enfield Council meeting (February 2020). The scheme is aligned with Ambition 3 of the strategy increasing the quality and affordability of private rented sector housing through development of a Build to Rent scheme with housing products offered at a range of rental levels. Build to Rent housing addresses an identified need for higher quality more secure private housing locally.
- 8.3.16 The housing will provide good quality housing and be available on long-term tenancies (up to five years proposed) – increasing security and stability. Of the 162 units, 40% (64) will be Affordable Housing and the remaining units will be rented at competitive market rates. All of the proposed units would comply with relevant Build to Rent qualifying criteria which will be secured in the s106 legal agreement where necessary. Subject to conditions and s106 planning obligations, the proposal is considered to accord with draft London Plan (ItP) Policy H11 and Mayor of London's Homes for Londoners: Affordable Housing and Viability SPG criteria and relevant guidance on Build to Rent schemes and would provide high-quality new homes.

Affordable Housing

- 8.3.17 The NPPF must be taken into account in the preparation of local plans and is a material consideration in planning decisions. The Revised NPPF identifies Build to Rent as purpose-built housing that is typically 100% rented out. Annex 2 of the Revised NPPF (February 2019) defines Affordable Housing as "housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers)". For Build to Rent schemes affordable housing for rent is expected to be the normal form of affordable housing provision. London Plan Policy H5 (ItP) sets out a strategic target for 50% of all new homes delivered across London to be affordable.
- 8.3.18 Enfield sets a borough-wide affordable housing target of 40% (Council's Core Strategy Policy 3). The Council will agree an appropriate figure, taking into consideration site-specific land values, grant availability and viability assessments, market conditions, as well as the relative importance of other planning priorities and obligations on the site.
- 8.3.19 Development Management Document Policy DMD 1 (Affordable Housing) is silent on Build to Rent schemes. DMD 1 supporting text notes that affordable

housing comprises three tenures: social rent, affordable rent, and intermediate housing. Enfield's Development Management Document Policy DMD 1 (Affordable Housing) states that development should provide the maximum amount of affordable housing with an appropriate mix of tenures to meet local housing need. Less than 1% of housing in the local area (Southgate Green ward) is intermediate housing.

- 8.3.20 In this context, London Plan Policy (adopted Policy 3.8 and emerging Policy H11) and the Mayor of London's Homes for Londoners: Affordable Housing and Viability SPG (2017) have substantial weight in respect of the assessment of build to rent schemes, and assessment of discounted market rent products as affordable housing.

Affordable housing delivery in Enfield

- 8.3.21 In 2016/17, 30% of housing completions were affordable, whilst in 2017/18 this decreased to 7% of housing completions being affordable, amounting to 37 units in total being delivered. These figures show that the target 40% affordable housing delivery is not currently being met in the Borough. The Housing and Growth Strategy (2020) sets out an ambition to increase the target of 50% of new homes to be affordable housing in the next Local Plan. Enfield's Housing and Growth Strategy (2020) states the Borough's ambition to develop more homes that are genuinely affordable to local people, so more people can live in a home where they spend a more reasonable proportion of their household income on housing costs.

Assessment: Maximising affordable housing

- 8.3.22 The Applicant has submitted an 'open book' Viability Appraisal which was scrutinised by the Council's independent viability consultants. The Council's independent viability consultants concluded the scheme cannot support more than 40% affordable housing, based on the tenure mix agreed and the specific nature of the site. The Council's independent viability consultants concluded the scheme is unviable by £1.17m. The Mayor of London's Housing and Viability SPG (2017) provides specific guidance on viability issues associated with Build to Rent. It notes the specific development economics associated with this type of affordable housing.
- 8.3.23 The Site forms part of a portfolio of sites across London owned by TfL and brought forward by 'Connected Living London' to support the Mayor of London's ambition of increasing the proportion of affordable new homes in the capital. The portfolio seeks to deliver 50% Affordable Housing averaged across the whole portfolio city-wide (delivering a minimum of 10,000 homes across London).
- 8.3.24 The Proposed Development under consideration here will provide 40% affordable housing based on habitable rooms. The 'portfolio' approach is accepted by Local Planning Authorities across London with the 50% strategic target achieved at a pan-London level in accordance with London Plan (ItP) Policy H5. Officers consider that, subject to early and late stage viability reviews, that the 40% Affordable Housing offer is in line with London Plan (ItP) requirements. Officers accept the Build to Rent 'portfolio agreement' justification in this case.

8.3.25 Scheme layout, scale and density have been informed by site-specific constraints and challenges of this site – with viability implications. Arnos Grove Station is a Grade II* listed building of unique importance in Enfield. It is one of the most highly regarded examples of Charles Holden's designs. Scheme design has been heritage-led, informing building layout, envelop and height and scale. Officers have also assessed that the scheme does not exceed the 'yardstick' density matrix parameters for this type of site. The design and heritage aspects of the scheme have been assessed below but in summary Officers consider the scheme design, including its scale and density, represent a sympathetic response within the setting of an important designated heritage asset – positively preserving and enhancing it. This has viability implications.

8.3.26` Officers have assessed the scheme delivers the maximum reasonable amount of affordable housing in accordance with London Plan (2016) Policy 3.12, London Plan Policy H5 (ItP). Affordable housing negotiations are in line with London Plan (2016) Policy 3.12 and H5 (ItP) Enfield Core Strategy Policy 3 and DMD1 requirements that negotiations consider the specific nature of the site, development viability and the need to achieve more balanced housing supply (see below).

Assessment: Tenure and identified housing need (Enfield and Southgate Green)

8.3.27 Locally within Southgate Ward, Office for National Statistics (ONS) data (household composition by tenure data current at October 2020) indicates the area surrounding the application site is primarily owner-occupied housing (private) or private rented housing. Less than 1% of housing in the local area is intermediate housing. Overall housing composition in the local area is 88% owner-occupied, private rented or living rent free. Approximately 12% of housing composition is social rented.

8.3.28 The data shows a lack of affordable housing tenures in Southgate Green ward. Housing mix is considered below, but in summary ONS data also shows the local area has a relatively high proportion of 3-Bed (or more) family houses, typically with a front door and garden – showing a lack of smaller affordable homes to support housing choice and a socially sustainable and balanced housing supply.

8.3.29 In Enfield, approximately 56,000 local households do not qualify for social rent and are unable to afford to purchase a home privately – relying on private rent housing. Build to Rent is more affordable and flexible than other private rented stock, providing quality and security. As many of these residents will not have priority for social housing and cannot afford to buy property, the provision of good quality, secure and affordable rental homes is necessary. Intermediate housing addresses this need.

8.3.30 Less than 1% of housing in Southgate Green ward is intermediate housing, and this percentage is also reflected across the Borough where intermediate housing stock represents a relatively low proportion – also 1%.

8.3.31 The tenure mix within the affordable housing is in line with adopted and draft London Plan policy. Officers have assessed that the proposed affordable tenures will address a demonstrated local need for proposed affordable housing, which would address the need for an underrepresented affordable

housing product within the Southgate Green ward, and across Enfield. It would introduce an appropriate form of affordable housing, within the Southgate Green ward, supported in London Plan policy and guidance (adopted and draft) providing a more balanced housing supply – in an area characterised by a lack of affordable homes generally, including smaller affordable homes and intermediate affordable housing.

Assessment: Affordability

8.3.32 Objections have been received raising concerns that the affordable housing will not be affordable to Enfield households. These include concerns that 85% of households in the Borough earn less than £60,000 and so would be unable to afford the affordable rents. Objections also reference the unaffordability of the proposed affordable housing relative to 'median household income in Enfield of just £34,000, while the average salaries of key workers in London is just £27,000'.

8.3.33 The Applicant's offer and relevant policy and guidance are summarised below:

- *The costs for all intermediate rented products (including London Living Rent, Discounted Market Rent) should be affordable to households on incomes of £60,000 or less.*
- *For dwellings 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 per cent of a household's net income.*
- *London Living Rent should be genuinely affordable with rents no greater than 40% of net household income.*
- *subject to the GLA's household income cap in place at the time of letting.*
- *An Intermediate product should be no greater than 70%-80% of market rent and no greater than 40% of net household income.*

8.3.34 *Affordability relative to income:* The Draft London Plan (ItP) states that all intermediate rent products should be affordable to households on incomes of up to £60,000. £60,000 household income is a cap, not an average or minimum. In comparison, Shared Ownership housing, has a higher cap of £90,000. Enfield Council supports Shared Ownership housing as an acceptable intermediate affordable housing product. When assessed relative to income Discounted Market Rent provides a more affordable and flexible housing product.

8.3.35 Within the immediate locality, data from Enfield Council's Knowledge and Insight Hub (2020) indicates Southgate Green ward has the 4th highest average (median) household income of the 21 wards in Enfield. Average household income in the ward is above the median level for the borough as a whole and higher than the London average. Based on this evidence, officers have assessed that the Discounted Market Rent homes would make a meaningful contribution towards the supply of affordable housing within Southgate Green ward, having regard to the relevant policy and guidance tests.

- 8.3.36 *Affordability relative to market rent.* When considered in respect of Enfield-wide affordability the supporting text to Enfield's adopted DMD 1 policy is relevant. While the policy is silent on Build to Rent and Discounted Market Rent, supporting text comments on rent affordability are relevant (para 2.1.4). It states '*Evidence shows that larger units at rent levels of 80% of market rent will be unaffordable to most families. For residents earning the median borough income, 78% of market rent for 2 bed units, 60% of market rent for 3 bed units and 49% of market rent for 4+ bed units would be affordable*'.
- 8.3.38 70% of the affordable homes at Arnos Grove are proposed as Discounted Market Rent (1- and 2-bedroom homes set at 70% of market rent). The 2-bed units discount of 70% represents a larger discount (more affordable) than the 78% of market rent for 2 bed units described as affordable in the DMD to 'residents earning the median borough income'. In respect of the 3- bedroom Discounted Market Rent homes, these are offered at a discount of 65% of market rent. While this is 5% above 60% of rent for 3-bed units described in the DMD Officers have balanced this against the benefit of the greater discount offered for 2-bed units, including larger 2-bed units. Officers have also agreed early and late stage reviews, that have potential to direct any surplus to further improve the level of discount for 3-bed DMR units or increase the % of DMR LLR 3-bed units.
- 8.3.39 London Living Rent is the Mayor of London's preferred Discounted Market Rent and is set by the GLA, on a ward by ward basis. 30% of the affordable homes at Arnos Grove are proposed at rent levels equivalent to London Living Rent for the Southgate Green ward where the site is located. Officers are satisfied these units represent genuinely affordable rent units – particularly in respect of Southgate Green ward.

Summary of Affordable Housing

- 8.3.40 The proposed Affordable Housing offer of 40% is based on habitable rooms which equates to approximately 39.5% of overall units. In terms of unit numbers this results in 64 of the proposed 162 units being Affordable. Tenure mix is set out below.

Tenure	1b2p	2b3p	2b4p	3b5p	
Market Rent	44	3	51	0	98
Discounted Market Rent	28	3	4	10	45
DRM at LLR Levels	12	2	1	4	19
Subtotals	84	8	56	14	162

- 8.3.41 Officers have assessed the scheme in accordance with London Plan (2016) Policies 3.10, 3.11 and 3.12, London Plan Policies (ItP) H5 and H11. Affordable housing negotiations are in line with London Plan (2016) Policy 3.12 and H5 (ItP) Enfield Core Strategy Policy 3 and DMD1 requirements that negotiations take into account the specific nature of the site, development viability and the need to achieve more balanced housing supply (see above and below).
- 8.3.42 The scheme is a Build to Rent scheme. London Plan (ItP) Policy H11 states that where housing is accepted by a Local Planning Authority as Build to Rent

(see assessment above) – affordable housing can be solely Discounted Market Rent (DMR) at a genuinely affordable rent, preferably at London Living Rent level. Enfield's adopted policies, including Development Management Document Policy DMD 1 (Affordable Housing) are silent on Build to Rent schemes. DMD 1 is also silent on preferred Discounted Market Rent levels and London Living Rent as preferred affordable housing products for Build to Rent schemes.

- 8.3.43 Officers have assessed that the affordable housing offer, including overall % and tenure represents the maximum reasonable amount of affordable housing deliverable – considering the specific context and character of the site and details of the scheme. Negotiations have taken account of the site's individual circumstances, in accordance with adopted London Plan Policy 3.12(B), emerging London Plan Policy H5 (ItP) and Enfield DMD1 policy in respect of affordable housing negotiations. This has included consideration of the provision for re-appraising the viability of the scheme prior to implementation (early and late stage viability reviews agreed) and other scheme requirements.
- 8.3.44 One of the key specific considerations (site and scheme) has been the critical need to preserve the setting of the Grade II* listed Arnos Grove station and ensure any scheme represents a proportionate and sympathetic response in the context of designated heritage asset / listed building and other non-designated heritage assets in the locality.
- 8.3.45 The details of the Affordable Housing offer will be captured via way of planning obligations. The Section 106 agreement will also contain review mechanisms (early and late), which will enable the Council to capture any uplift in value afforded to the site after planning permission has been granted.

8.4 Density

- 8.4.1 Objections have been received that the proposals would result in overdevelopment and excessive density within the Arnos Grove area. Officers have assessed the density of the scheme – and concluded that it is in line with adopted local and regional (London) density guidance. This is in addition to the applicant following a design-led response, in accordance with the preferred and emerging London Plan (ItP) approach to optimising site capacity.
- 8.4.2 NPPF paragraph 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'. Adopted London Plan Policy 3.4 requires development 'optimise' housing output taking account of public transport accessibility, local context and character and design principles. It includes Table 3.2 – Sustainable residential quality (SRQ) matrix – providing an indication of appropriate densities in an urban location. Policy 3.4 makes clear that the matrix should not be applied mechanistically. The site has a forecast PTAL of 4/6. Taking account of the Local Centre designation of part of the site, Arnos Grove underground station and bus interchange context – the site has an Urban Character. For such sites, the current density matrix provides an indicative density of 200-700 habitable rooms per hectare (hr/ha) or 70 to 260 units per hectare (u/ha), for schemes with 2.7-3.0hr/unit.

- 8.4.3 Policy H10 of the London Plan (ItP) promotes higher density development in locations with a good PTAL score and in close proximity to a local centre in order to ensure the most efficient use of land and to optimise the provision of housing. The London Plan (ItP) incorporates a different approach to assessing density – advocating a design-led approach. London Plan policy D3 (ItP) does not follow a matrix approach providing indicative densities. It instead advocates for the best use of land by following a design-led approach that optimises the capacity of sites. This determines the most appropriate form of development, responding to a site's context and capacity for growth and existing and planned supporting infrastructure capacity (as set out in Policy D2).
- 8.4.4 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. Policy DMD8 requires proposals be in an appropriate location and of a suitable scale, bulk and massing.
- 8.4.5 Enfield Policy DMD6 promotes density appropriate to the locality – in line with the Published London Plan Policy 3.4 density matrix. Policy DMD8 which requires proposals to be in an appropriate location and of a suitable scale, bulk and massing. In this instance the Proposed Development is located in a highly accessible location with a PTAL rating of 4 to 6a, at Arnos Grove underground station and a bus interchange at the front of the station. Enfield Issues and Options (Regulation 18) document (Para. 2.4.1), acknowledges the need to 'exhaust all reasonable opportunities on brownfield land, making underused land work harder and optimising densities with this aim being a 'first principle' of the document.
- 8.4.6 Published London Plan Policy 3.4 (Table 3.2) ((Sustainable residential quality (SRQ) density matrix (habitable rooms and dwellings per hectare)) of the current London Plan sets out guidance for appropriate density in an urban location. The guidance suggests that 70-260u/ha is appropriate in areas with a good PTAL and with an average of 2.7-3.0hr/unit. The proposed density of 143.3u/ha is in line with the density matrix – and therefore the density expectations of adopted Enfield DMD Policy 6. While Officers do not consider the site should be assessed as 'suburban' or solely in respect of the density matrix, the proposed hr density (368.1 hr/ha) would also fall within the range for a PTAL 4-6 suburban site.
- 8.4.7 In summary, the scheme does not exceed Enfield adopted DMD Policy 6 expectations in respect of scheme density (u/ha for an urban or suburban site). Officers note, that Enfield DMD Policies on density reference adopted London Plan policies which would be replaced by the new draft London Plan (ItP) approach which removes the density matrix in preference of a design-led approach.
- 8.4.8 Officers have assessed that the proposed scheme is aligned with the density expectations for the site, under both sets of London Plan policies – the matrix-based Published London Plan Policy 3.4 and design-led London Plan (ItP) Policies D2 and D3. The scheme does not exceed 350u/ha, which is the definition of 'higher density' development in the London Plan (ItP). This

means it falls below the density threshold set for increased scrutiny of design quality set in London Plan (ItP) Policy D4 (Part D and E).

- 8.4.9 The applicant has nevertheless still pursued a process of extensive design scrutiny, including two Independent design review panel meetings. Enfield's Design Review Panel concluded, in their last review, that the height and scale of the scheme was appropriate for the surrounding context. The scheme is a high-quality well considered architectural response on a complex and challenging site. It proposes significant enhancements, which will benefit future and existing residents – including public realm enhancements.
- 8.4.10 The scheme, when assessed against adopted and emerging density policy, would not result in overdevelopment or excessive density. The scheme would result in a high-quality design, and well considered architecture and approach to the public realm, providing 162 residential units across the site. When considering the proposed density in the round alongside the site's good PTAL rating, its acceptable impact on residential amenity and its sufficient social infrastructure, it is considered that the scheme results in an appropriate level of development for the site. Further, the quantum of units proposed is acceptable in its specific local setting, subject to all other material planning considerations being met. In density terms the proposed development is in line with existing and emerging policy both at local and regional level.

8.5 Housing mix

- 8.5.1 Officers have sought to maximise affordable family housing in the scheme. All family housing (3-bed/5-person) within the scheme (21.88% of the affordable homes) are offered as affordable (4 x LLR and 10 x DMR of 65%). Officers have secured early and late stage viability reviews, with any surplus recommended to be directed towards improving the affordability of family housing, through lower % DMR for 3-beds; increased numbers of DMR at LLR level 3-beds. There are no private 3-bed/5-person homes proposed in the scheme, all family homes are affordable.
- 8.5.2 The remainder of the scheme responds to local demand for 1 and 2-bed units in line with predicted smaller household sizes and to provide a wider mix of unit sizes than is currently evident in the Ward.
- 8.5.3 The units will be located within the blocks as follows:

Table 4: Buildings and Tenures

Building and Tenure	Unit Size													
	1B2P		1B2P (WC)		2B3P		2B3P (WC)		2B4P		2B4P (WC)		3B5P	
	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%
A01 Private	17	22%	3	50%	0	0%	0	0%	11	21%	3	100%		0%
A02 Affordable	38	49%	2	33%	0	0%	5	63%	5	9%	0	0%	14	100%
A02 Private	0	0%		0%	0	0%	0	0%	2	4%	0	0%		0%
B01 Private	4	5%	1	17%	0	0%	1	13%	10	19%	0	0%		0%
B02 Private	19	24%		0%	0	0%	2	25%	25	47%	0	0%		0%
Total	78		6		0		8		53		3		14	

- 8.5.4 The Affordable Housing and Viability SPG highlights that in respect of Build to Rent schemes that local policies requiring a range of unit sizes should be applied flexibly to Build to Rent schemes in preferable Build to Rent locations to reflect demand for new rental stock, which is much greater for one and two beds than in owner-occupied or social/ affordable rented sector. The SPG notes that Build to Rent can be particularly suited to development on the edge of town centres or near transport nodes. In addition, LPAs should take account of the distinct economics of Build to Rent, where potential yields and investment risk can be affected by increases in the number of large units within a scheme.
- 8.5.5 The Council's Core Strategy Policy 5 and Development Management Document Policy DMD 3 set out housing mix need however, the Council's Strategic Housing Market Assessment (SHMA) which post-dates these policies illustrates an annualised requirement, between 2016-2041, for new homes to be 55% 1-bedroom, 16% 2-bedroom and 14% 3-bedroom. Officers have also considered the existing high proportion of existing 3+bed family houses in Southgate Green ward and GLA Strategic Housing Market Assessment (SHMA) predictions that between 2011-2035 around 70% of newly forming households will be 1 and 2-person households without children.
- 8.5.6 The proposed homes would provide greater choice for people wishing to live in the area who are not part of a larger household. Developments in highly public transport accessible locations and close to facilities are also more suitable for smaller units where car ownership and use is lower – which in turn supports the car-free approach proposed for the scheme. All of the units in the development, including larger size units have appropriate private amenity spaces.
- 8.5.7 In light of the above, the proposed housing mix it is considered appropriate, having regard to the Build to Rent typology and specific site characteristics and location. London Plan (ItP) Policy H10 notes that well-designed one- and two- bedroom units in suitable locations can attract those wanting to downsize from their existing homes, and this ability to free up existing family stock should be considered when assessing the unit mix of a new build development.

8.6 Residential Quality and Amenity

- 8.6.1 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'. The guidance states that developments should seek to:
- Function well and add to the overall quality of the area for the lifetime of the development;
 - Be visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
 - Be sympathetic to local character and history;
 - Establish a strong sense of place and welcoming and distinctive places; and
 - Optimise the potential of the site to provide an appropriate mix and amount of development, green and public space, local facilities and transport networks;

- Create safe, inclusive and accessible spaces with a high standard of amenity and where crime or fear of crime does not undermine community cohesion or quality of life.
- 8.6.2 Meanwhile Policy D6 of the London Plan (Intend to Publish), sets out housing quality and design standards that housing developments must take into account to ensure they provide adequate and functional spaces; sufficient daylight and sunlight; avoid overheating; and maximise the provision of outside space. The Policy notes that design must not be detrimental to the amenity of surrounding housing. Table 3.1 sets out the internal minimum space standards for new developments and Table 3.2 of the London Plan provides qualitative design aspects that should be addressed in housing developments.
- 8.6.3 Policies D5 and D7 of the London Plan (Intend to Publish) set out that new developments are required to support mixed and inclusive communities, which includes provision for wheelchair accessible and wheelchair adaptable units, as well as an environment that is welcoming and accessible by all.

Accessible Housing

- 8.6.4 Policy D7 of the London Plan (Intend to Publish) sets out that in order to provide suitable housing and genuine choice for London's diverse population, including disabled people, older people and families with young children, residential development must ensure that: i) 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'. The Proposed Development meets relevant criteria in relation to accessible housing and is considered acceptable in this respect.

Housing quality

- 8.6.5 The Site has specific constraints in terms of access (including the bus interchange at the front), topography (including significant level drops) and tree Root Protection Areas. These site-specific constraints have influenced the percentage of dual aspect units, particularly when compared to the buildings on Site B. The housing proposed within Site A is characterised by other amenity benefits, including well-proportioned and sized family 3-bed homes. Site A is also closest to proposed on-site doorstep provision – as well as other play spaces within the local area. Site A housing blocks also include internal communal amenity and concierge. All units in the development, across Sites A and B, meet London Plan (ItP) requirement levels of allocated private amenity space.
- 8.6.5 All of the units either meet or exceed internal floorspace standards required by Table 3.1 of the London Plan (ItP) and comply with the qualitative design aspects to be addressed in housing developments required by Table 3.2 (ItP). All units would meet residential space standards and would include sufficient private outdoor amenity space. The community spaces also include a range of external amenity opportunities. All ground floor units have defensible space at the front – where they front onto more public areas.
- 8.6.6 The Proposed Development would comprise 74% of dual aspect units, with no north facing single aspect units. Within the constraints of the site this is considered to represent a high-quality response. Significantly, all proposed

family housing (offered as affordable homes) will be dual aspect, as will all 2-bed homes.

- 8.6.7 Some floors within Site A buildings have up to 10-units per core, which is above the 8-units per core set out in Policy D6 of the London Plan (ItP). The Mayor of London's Affordable Housing and Viability SPG notes that when assessing Build to Rent schemes in respect of design that LPAs are encouraged to take into account the value of on-site management and purpose-built design in dealing with some of the challenges that would otherwise arise were it a build for sale scheme. For example, this may allow flexibility such as on the number of homes per core per floor, and number of single-aspect homes. The core would have good natural light penetration in the lift area and Officers have assessed that the scheme provides a good response, within the constraints of the site.

Daylight/sunlight future occupiers

- 8.6.8 The submitted Daylight/Sunlight assessment includes an analysis of whether the Proposed Development will receive adequate daylight/sunlight in the units and in public and communal amenity areas.
- 8.6.9 The assessment of proposed habitable rooms for Average Daylight Factor (ADF), No-Sky Line (NSL) and Room Depth Criterion (RDC) indicate that overall, 94% and 95% of all proposed rooms meet or exceed the suggested minimum levels for ADF and NSL respectively. In addition, all rooms have been designed to meet the RDC where this applies, i.e. in rooms with a single aspect. Officers have assessed this also represents a very good performance in respect of daylight – particularly within the constraints of the site and scheme characteristics.
- 8.6.10 In relation to sunlight, BRE's guidelines state that sunlight is mostly required in living spaces with the greatest expectation of sunlight within south facing rooms. Living areas with a window facing within 90 degrees of due south were assessed for sunlight availability both annually (Annual Probable Sunlight Hours (APSH) and in winter (Winter Probable Sunlight Hours (WPSH)). The assessment showed that overall, 89% of the assessed living spaces are expected to meet or exceed the recommendation annually (APSH) with 94% doing so during the winter months (WPSH). Officers have assessed this also represents a good level of performance for a scheme, with limited opportunities for units to be directly orientated south, due to the site's geometry.
- 8.6.11 The daylight and sunlight results are discussed in more detail, per building as below:

Building A01

- 8.6.12 The technical assessments undertaken for Building A01 indicate there will be excellent levels of daylight and sunlight, with all 82 rooms meeting or exceeding the recommended levels of ADF and all assessed living spaces receiving levels of sunlight in line with BRE's recommendations both annually and during the winter months.
- 8.6.13 With regard to sky visibility, all but eight rooms fall short of the recommended level of NSL. The eight rooms that do not meet the recommended level of

NSL are bedrooms. However, these rooms will still receive levels of ADF well above guidance recommendations and as such will be adequately daylight.

Building A02

8.6.14 The technical assessments undertaken for Building A02 indicate there will be excellent levels of indoor daylight, with all 172 rooms meeting or exceeding the recommendations for ADF. With regards to NSL three bedrooms will not meet the recommended level of NSL however these bedrooms will exceed the suggested level of ADF and will therefore be expected to will receive adequate indoor daylight.

8.6.15 With regards to sunlight, the assessment showed that 41 of the 48 living spaces would either meet or exceed the recommended levels of sunlight both annually and during winter. The seven living spaces that would not meet the recommended level of sunlight would have balconies acting as shading devices i.e. intercepting the sun rays before they reach the fenestration. However, this is not an uncommon scenario and notwithstanding future occupants would still be able to enjoy sunlight from their balconies.

Building B01

8.6.16 The assessments undertaken for Building B01 indicate that good levels of daylight overall would be expected. Thirty-seven (73%) of the fifty-one rooms tested would either meet or exceed the recommended level of ADF and all but one would meet NSL requirements.

8.6.17 Fourteen rooms would not meet recommended guidelines for ADF, and these are as follows:

- 9 are open-plan Living/Kitchen/Diners which see lower daylight levels than that recommended for rooms including a kitchen
- 4 of these would have double-aspect long layouts in which the kitchen would be located at one end of the room and the living room in the other less obstructed end with considerably bigger window sizes
- These areas would still meet the ADF criteria for living rooms, and future occupants would be expected to receive good levels of daylight from within the living space of the room
- 5 remaining areas - kitchen/dining areas with an adjoining living room – would be very well daylight, and future occupants would be expected to receive very good levels of daylight
- 5 remaining rooms are all secondary bedrooms and would be expected to receive good levels of daylight

8.6.18 With regards to sunlight, all assessed living areas in building B01 would be expected to meet BRE's recommendations both annually and during the winter months resulting in excellent levels of sunlight.

Building B02

8.6.19 The technical assessments undertaken for Building B02 indicate that 112 (92%) out of 122 habitable rooms would be expected to meet or exceed BRE's recommended ADF levels, and 111 rooms (91%) would be expected to meet requirements for NSL.

- 8.6.20 Ten rooms would not meet recommended ADF levels. Out of these ten rooms, five would be generously sized Living/Kitchen/Diners. One Living/Kitchen/Diner would meet the recommended level for living areas and as such would be considered adequately daylight.
- 8.6.21 The remaining four Living/Kitchen/Diners would be expected to achieve levels of ADF of 1-1.1% owing to the presence of the balcony in front of the window. As mentioned for Building A02, this is not an uncommon scenario in urban environments and is considered acceptable in this context.
- 8.6.22 Five remaining rooms which would not meet recommended ADF levels are secondary bedrooms located in the inner corners of the scheme, where the daylight is generally lower in any event.
- 8.6.23 With regard to sunlight, seven living areas do not meet BRE's recommendations both annually and during the winter months. However, the seven failing rooms meet the recommended target during the winter months, when the sun is lower in the sky and the sun rays are not intercepted by the balconies. Furthermore, for this building future occupants will receive sunlight from their balconies especially during the summer months. Given the urban context of the location, this digression is considered acceptable in this particular instance.

Overshadowing – Public and Communal Amenity Areas

- 8.6.24 In relation to overshadowing of communal amenity areas within the Site, both public and communal areas were tested, and it was found that all proposed areas exceed the suggested (BRE guideline) target on 21st March. This means that the public and communal amenity areas will experience very good/ excellent levels of sunlight.
- 8.6.25 Furthermore, a sunlight exposure analysis of these areas indicates that during the summer months, when the areas are more likely to be utilised for open air activities, the majority of the space receives in excess of six hours of direct sunlight.
- 8.6.26 Given the above the assessment concludes that future occupants of the Development will experience very good/ excellent levels of sunlight from the open spaces proposed within the site.
- 8.6.27 Overall, the expected level of amenity for future occupiers of the Site, as outlined above, is considered acceptable.

Child Playspace and Recreation Space

- 8.6.28 Policy 3.6 of the London Plan 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.
- 8.6.29 The Mayor's 'Shaping Neighbourhoods: Play and Informal Recreation' SPG sets a benchmark of 10 sq.m. 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. Meanwhile London Plan (Intend to Publish) Policy

S4 also recommends that at least 10 sq.m of playspace per child should be provided. In comparison Council Policy DMD 73 does not specify a specific amount of space per child, it sets out that developments with an estimated child occupancy of ten or more children will be required to incorporate on-site play provision to meet the needs arising from the development.

- 8.6.30 The GLA population yield calculator has been used to estimate the possible number of children that could live at the Proposed Development as around No.26. In terms of ages these are expected to be as follows:

Under 5's:	14.4
Age 5-11:	9.4
Age 12+:	2.9

In terms of playspace provision, the following is required and proposed:

Under 5's:

Required:	10 sq.m per child (144 sq.m in total)
Proposed:	158 sq.m of doorstep play + 150 sq.m of incidental play

Age 5-11:

Required:	10 sq.m per child (94 sq.m in total)
Proposed:	120 sq.m

Age 12+:

Required:	10 sq.m per child (29 sq.m in total)
Proposed:	No on-site play. Playspace will be provided at Arnos Park which is within the 800m distance permitted for playspace located outside of the site.

- 8.6.31 The above figures show that playspace provision will exceed GLA requirements. In addition, given the close proximity of Arnos Park and the existing good quality of the space at the Park, this is considered an acceptable off-site location to provide playspace for the estimated 2.9 children aged 12+ who may live at the future Development.

- 8.6.32 Playspace for children aged 5+ will be concentrated around Block A02 which also houses the larger family size units whilst doorstep and incidental playspace will be spread across Sites A and B.

Landscape and Amenity Space

- 8.6.33 With regards to landscape provision on the site and residential amenity space, each unit will have a private balcony that meets required size standards as stated in the London Plan (Intend to Publish).
- 8.6.34 The proposed external amenity space will total 3,230 sq.m and will include areas accessible to the public including the public square and will also include private shared amenity providing spaces for occupiers of the development. The private areas will be in line with Healthy Street objectives which seek to prioritise people over vehicles. This will be provided by enclosed by vegetation and planting which will be selected to increase the ecological connectivity with the adjoining SINC and Wildlife Corridor.

- 8.6.35 The above assessment shows that there will be an over provision of playspace for children up to the age of 12 and close proximity of a good quality public park for children aged over-12. Furthermore, the application demonstrates that there will be generous landscape and amenity space. The amenity space will include both private amenity space to each unit and shared, private amenity space for use by residents. The external amenity space will also include areas accessible to the public including the public square. Taking all of the above into consideration the Proposed Development is considered acceptable in terms of playspace, amenity space and landscape provision.

Summary of Residential Quality and Amenity

- 8.6.36 The National Design Guide (Para. 63) sets out that 'Compact forms of development bring people together to support local public transport, facilities and local services.' Para. 64 further notes that 'Well-designed new development makes efficient use of land with an amount and mix of development and open space that optimises density', further noting that (it) also 'relates well to and enhances the existing character and context.' The National Design Guide further notes that groupings of buildings, spaces, uses or activities create a sense of place, promoting inclusion and cohesion.
- 8.6.37 The layout and massing of the Development has evolved in order to optimise the site's capacity, as in required in policy terms for brownfield land sites in highly sustainable locations. All proposed units will either meet or exceed internal space standards and each unit will have private external amenity space with a minimum of 5 sq.m for 1-2 person dwellings with an additional 1 sq.m per additional occupant. The development has been designed to be tenure blind, with no distinction in terms of quality between private and affordable units.
- 8.6.38 Whilst some levels of buildings on Site A exceed the recommended number of units per core of 8 (London Housing SPG), the nature of a Build to Rent development means it will be highly managed and have an active concierge, controlled access, two lifts per core and with natural ventilation and daylight within the corridors.
- 8.6.39 The proposed units have been designed in accordance with required policy standards including Enfield Policy DMD 8, London Plan Policy 3.5 and emerging London Plan (Intend to Publish) Policy D6, and represent a good quality development, with good levels of residential amenity. Whilst there are some exceptions to the compliance of the proposals, such as some single aspect units, Officers consider these are outweighed by the overall quality of the accommodation, including high levels of good quality outdoor amenity space, as well as the benefits delivered in terms of housing delivery and other benefits of the scheme.

8.7 Design

- 8.7.1 Heritage and character have been proactively considered and influenced the high-quality design and placemaking benefits of the proposal. The proposal has been subject to extensive pre-application engagement, an independent design review process and public consultation.

- 8.7.2 Historic England have raised no concerns about the Proposed Development. The Enfield Society, Enfield Conservation Officers, the Conservation Advisory Committee and the Greater London Authority are supportive of the heritage merits of the scheme. Enfield's Design Review Panel concluded, in their last review, that the height and scale of the scheme was appropriate for the surrounding context.
- 8.7.3 The scheme is a high-quality well considered architectural response on a complex and challenging site. It proposes significant enhancements, which will benefit future and existing residents – including public realm enhancements.

Layout and introduction of non-residential uses and frontages

- 8.7.4 Scheme layout has been informed by key considerations, including the critical need to preserve the setting of the Grade II* listed Arnos Grove station, and minimise mature tree loss. The layout has considered constraints including the locally listed Arnos Park, which also lies within Metropolitan Open Land and the Grade II* listed station and associated assets such as the car park wall and lampposts.
- 8.7.5 The proposal incorporates new public realm at the front of the site – which is a scheme benefit, improving the setting of the listed Arnos Grove station building. Officers consider this represents an improvement over the existing situation.
- 8.7.6 Representations have been received raising concerns about security, including concerns from those who currently drive and park near the station – because they may feel vulnerable walking on the streets rather than driving to the station. One of the primary aims of the Mayor of London (Mayor's Transport Strategy) approach, reducing car-reliance and encouraging non-car travel, is to promote feelings of safety and security increasing activity, including pedestrian footfall.
- 8.7.7 Scheme layout, uses and active frontages are considered to successfully respond to policy objectives set out at Enfield's Core Strategy (2010) Core Policy 45 (New Southgate) in respect of place shaping within this priority area. Taking a holistic and integrated approach to development, including street based urban design solutions such as the delivery of a new square.
- 8.7.8 The proposal would introduce an active frontage, including a non-residential unit / frontage within the ground floor of Building A01 - fronting onto the new square. A concierge / resident's lounge / gym area are also proposed along this frontage. These uses would also and as such will be expected to have a higher level of activity than the other buildings. Officers have assessed that the introduction of permanent active uses, including the non-residential unit, concierge / resident's lounge / gym area.
- 8.7.9 Site constraints such as substantial ground level changes, locally listed park (Arnos Grove), proximity to railway and Site of Importance for Nature Conservation (SINC) as well as proximity to neighbouring properties, were identified and understood and directly influenced the layout of the proposed development. The resulting layout seeks to minimise overlooking and preserve the amenity of local residents to an acceptable degree, given the constraints of the site.

- 8.7.10 Scheme layout (together with scale and massing) is assessed to be in accordance with Enfield's adopted NCAAP policy (NC Policy 17 Arnos Grove Station) which states that respecting the setting of the station could be achieved by setting the building line of new development back so that views from the local centre are not interrupted.

Scale, height and massing

- 8.7.11 While the proposed height and scale of the buildings is a change compared with the site's current condition (a brownfield site with a single small kiosk structure, lamp posts and parking barriers), officers consider it to be well handled, and sympathetic to the designated heritage asset / listed building, the preservation of which is important (see below).
- 8.7.12 The principle of introducing height and massing at transport nodes is supported by planning policy. As assessed above, the site is identified as an 'opportunity site' within Enfield's adopted development North Circular Area Action Plan – at NC Policy 2 (Opportunity Site 7). With NC Policy 17 noting the site has potential to be released for redevelopment. A magnitude of change at this site is therefore considered acceptable, subject to detailed assessment of the scheme.
- 8.7.13 Scheme massing has evolved as a sophisticated response to the site's constraints. Proposing varied heights across the site which respond to complex site-specific considerations – including topography, maximising mature tree retention and the listed building. The massing strategy for the scheme was informed by analysis of impacts, including consideration and assessment of the scheme's potential impacts on neighbouring properties – this is aligned with London Plan Policy D3 (ItP) which requires that developments optimise capacity through a design-led approach, by responding to a site's context, capacity for growth and supporting infrastructure capacity.
- 8.7.14 Blocks A01 and B01 (which flank the listed building to the east and west) present as modest human-scaled elements onto Bowes Road, importantly preserving views towards the station. Taller buildings take advantage of the significant site slope – to reduce perceived height.
- 8.7.15 The scheme underwent several iterations throughout the pre-application process and a further revision during consideration of the scheme in response to Officer comments. The scheme was revised in September 2020, with revisions including separate private external amenity space; redivision of communal and private amenity space to ensure amenity space throughout the site was allocated for optimum use; and revisions to the materiality of the boundary area between the Proposed Development and existing neighbouring properties.
- 8.7.16 Overall, the proposed massing, scale and siting of the proposed buildings is considered to ensure a positive sense of hierarchy is maintained across the site, and that the listed building is not dominated by the proposal – and importantly that its setting is preserved and enhanced.
- 8.7.17 Scale and massing (together with layout) were explored throughout a lengthy pre-application process, including discussion with Historic England and the

Council. This included reductions in height to Block A02 to minimise its visibility in the setting of the listed Underground station. Scale and massing are assessed to be in accordance with Enfield's adopted NCAAP policy (NC Policy 17 Arnos Grove Station) which states that new development would need to respect the setting of the Grade II listed station building. In respect of DMD Policy 43 the scheme is not considered to fall within the criteria for assessment.

8.7.18 The proposals comprise 4 blocks (A01, A02, B01 and B02). Half of the blocks are four storeys or less. The tallest blocks, to the north of the site are substantially lower than several taller buildings within proximity of the site, which form part of the existing townscape (with heights of up to thirteen storeys). Fronting onto Bowes Road, the proposal has a prevailing height of between 1, 3 and 4 storeys, introducing modest and human-scaled elements compatible with, and in some cases lower than surrounding buildings. Buildings up to six-storeys along main thoroughfares such as Bowes Road already exist to the west of the site. The proposal has not been referred to (or accepted by) the Mayor of London based on height – it is referable based on unit numbers.

8.7.19 The overall scale and massing of the scheme is considered to accord with London Plan Policy GG2 (ItP) which encouraged that new buildings and spaces respond to 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. The varied and stepped height approach is supported by National Design Guidance which notes this can create a varied roof line, so that a development can sit sensitively in the wider (historical) context.

Character and townscape, including views

8.7.20 NPPF, London Plan and Enfield Policies are supportive of optimising sites provided that developments are of a high-quality design that are sympathetic to the surrounding area. Adopted London Plan Policies 7.1 and 7.4 and London Plan Policies D1 and D2 (ItP) seek to ensure that new developments are well-designed and fit into the local character of an area. Adopted London Plan policies require developments to optimise housing output, taking into account local context and character. Policy 3.5 of the current London Plan seeks to enhance the quality of local places taking into account local character and density. Core Strategy Policy 30 states that all developments and interventions in the public realm must be high quality and design-led. Development Management Document policy DMD 37 notes that development should be suitable for its intended function, appropriate to its context and regard to its surroundings.

8.7.21 Enfield Characterisation Study indicates the site is located in a Mixed Urban Areas – Centre – Metroland Centres typology. The Study states that with regards to 'Metrolands' these centres tend to be 'contemporary with their local area' as opposed to a centre that has evolved historically over time.

8.7.22 The applicant has submitted a Townscape Visual Impact Assessment (TVIA). The TVIA includes 11 verified views, agreed with Officers. Views A, B and C use a fully-rendered model of the proposed buildings and landscaping, while the remaining eight views illustrate the location of the proposed buildings with a green 'wireline', which is solid where the building outline will be visible and

dashed where the building outline will not be visible. The TVIA assess the effects of the proposed development on these 11 views, identifying the nature of potential effects, their magnitude and their nature. It then goes on to consider cumulative effects.

8.7.23 The report concludes that 'the beneficial effects on townscape and views of the station resulting from the construction of the proposed buildings are considered to outweigh any adverse effects it will have on the three key views of the Grade II* listed Underground station from Bowes Road (Views A, B and C as illustrated below). The design has been led from the earliest stages by an understanding and response to the listed station and surrounding interwar townscape, and this is reflected in the final design, materiality, height, massing and scale of the new buildings'. The TVIA concludes that 'overall, the proposed development will have a beneficial townscape and visual impacts within the study areas and will preserve the significance and setting of Arnos Grove Underground Station'.



Fig. 1: View A - Proposed view from Palmers Road/Bowes Road



Fig. 2: View B - Proposed view from Railway Bridge



Fig. 3: View C - Proposed view from Bowes Road (opposite Arnos Road)

- 8.7.24 An objection has been received in respect of views from Arnos Park – stating that the building will dominate the skyline. Officers have assessed proposed view G from Arnos Park (western section) together with the Design and Access Statement and Heritage Statement in detail – which all consider the impact on views from Arnos Park in detail (see also heritage assessment below). The proposal will result in some impact on the park, introducing a new urban development as a permanent part of this view – with a minor detrimental effect (more pronounced in winter). This effect is mitigated through modulation of the scheme’s scale and massing – reducing its visual impact.
- 8.7.25 An objection has also been received in respect of the views from Pymmes Brook, near Waterfall Road – noting that no view has been submitted showing the railway arches, which are locally listed. Views were agreed through discussion with the applicant and included consideration of the likely nature and magnitude of any effects. While no view has been submitted, the railway arches are considered within the context of the scheme’s development as part of the site’s opportunities and constraints as demonstrated by the submitted Design and Access Statement which includes photos of the railway arches (although these do not include the proposed scheme). Officers have visited the site, and considered the potential impact, this has included in reference to view G (Arnos Park - western section). View G is taken at a point closer to the proposed scheme, and further east giving direct views towards the scheme. Officers have assessed that views of the scheme from Pymmes Brook, near Waterfall Road would have no greater visual impact than the one seen from View G. The scheme would have a lesser and limited impact. The railway arches would continue to dominate the view.
- 8.7.26 Officers are satisfied the 11 selected viewpoints assessed in the TVIA have provided a robust framework for assessing the impacts of the scheme on heritage assets, townscape and landscape character. TVIA views were agreed at pre-application stage with LB Enfield and Historic England.
- 8.7.27 Officers have assessed there will be an impact in terms of views arising from the development, the three key views illustrated above will be changed with a moderate scale of effect and aspects of this impact will be adverse. These are balanced with other aspects of the development which will have a beneficial impact of views of the station. The proposal is assessed as truncating some more distant views of the station from further east along Bowes Road and generally affect the sense of isolation around the main station building. Other aspects of the development will have a beneficial impact on views of the station. For example, where views of the ticket hall drum’s roofline will be maintained in shorter views from Bowes Road, illustrated in Views A and B – maintaining the station’s prominence in the townscape.
- 8.7.28 The approach to form, height, scale and massing would also introduce a stronger sense of place and would also introduce a well-designed, contemporary development that would have a stronger and more positive presence compared to the existing situation. On balance, Officers agree with the conclusions of the TVIA and consider the scheme would generally have a positive effect on townscape. The scheme would not affect any strategic views identified in the London Plan. The Proposed Development is considered to represent a high-quality design, which will help create a distinctive sense of place and will make a positive contribution to the wider townscape. The layout and scale of the scheme was amended during pre-

application in line with adopted Enfield North Circular Action Plan NC Policy 17 Arnos Grove Station – to ensure that it respect the setting of the station, setting the building line of new development back so that views from the local centre are not interrupted.

Articulation and Materials

- 8.7.29 As well as the importance of height differentiations and carefully varied massing in the Development, high-quality architectural articulation, materiality and elevational treatment is essential. The architectural approach can help integrate a development into its context through careful use of articulation, proportions, materials and elevational treatment, helping to give a building an identity. As such, this element of the proposal has been the subject of significant discussion between the Council and the applicants during pre-application stage and during the live submission, resulting in refinements to the design.
- 8.7.30 The proposal has gone through several iterations to test a variety of design responses in relation to architectural approach and the elevational treatment. The current proposal seeks to provide a robust, simple symmetry that achieves visual interest without becoming overly complicated or busy and aligns with the simplified forms of the modernist movement. The resulting design is considered to respect the rounded modernist 1930s design of the London Underground station. The submission documents refer to the integration of projecting banding to “group windows together and provide an overarching horizontal order” and this approach is supported by Officer’s.
- 8.7.31 Likewise, the use of projecting balconies with high quality railing (noting that a planning condition requiring details of balcony materials is recommended); and the close attention paid to the articulation of windows throughout the Development, is supported by Officers. The resulting variation across the site ensures the buildings do not dominate the Station but instead add variety and visual interest to complement the listed building. This approach is considered a substantial improvement on the existing situation. Planning conditions pertaining to materiality are recommended to ensure the areas of proposed public realm are of a high quality and the built form is exemplary in terms of materiality.
- 8.7.32 There has been substantial discussion on articulation and materiality in respect of the scheme, including the gable end of 348 Bowes Road, facade treatment of Block A01 (to be more symmetrical) and materiality. Officers have weighed these with the scheme’s merits. These are summarised at Sections 1 and 11 and include the improved setting to the listed building and careful consideration of the three key factors LPAs are required to consider in determining proposals that affect heritage assets (NPPF paragraph 189). Taken on balance and considering the scheme benefits the proposed articulation and elevational treatment is considered to be of a very high standard and, will help create a distinctive sense of place in and around the Station, resulting in the Development making a positive contribution to the area.

Conclusion of Design

- 8.7.33 The National Design Guidance sets out that well-designed places have ten key characteristics which work together to create its physical character and

help to nurture and sustain a sense of community. The Guidance further states that these 10-characteristics contribute towards the cross-cutting themes for good design set out in the NPPF. The ten characteristics are as follows:

1. Context – enhances the surroundings;
2. Identity – attractive and distinctive;
3. Built form – a coherent pattern of development;
4. Movement – accessible and easy to move around;
5. Nature – enhanced and optimised;
6. Public spaces – safe, social and inclusive;
7. Uses – mixed and integrated;
8. Homes and buildings – functional, healthy and sustainable;
9. Resources – efficient and resilient; and
10. Lifespan – made to last.

8.7.34 The application has been subject to significant pre-application and post-submission discussion with urban design officers. While not all amendments were secured in response to comments from the urban design team, they have concluded that they are largely supportive of the application, concluding that planning gains outweigh other matters. Officers have considered these comments in detail, including supportive comments made in respect of: the new square; overall scale and massing (seen as appropriate for both the context of the station and the surrounding context); design approach; creation of an active frontage to the square; tree retention; bronze balcony detailing; the car free nature of the scheme; and high level of cycle parking. The design has evolved in the context of a clear understanding of the site's opportunities and constraints, and the capacity of the site has been optimised to deliver as many units as possible, whilst respecting and responding positively to the local character, designations, natural and built infrastructure and heritage assets.

8.7.35 The Proposed Development is considered to meet all of the characteristics set out above to a degree, and in doing so creates a unique and distinctive development which does not seek to compete with the existing townscape or Station, but rather seeks to contrast and complement it. It achieves this by the use of thoughtfully designed and positioned buildings, well considered public realm and relevant and needed uses within the buildings. The Proposed Development has been well conceived on the basis of a clear design vision and being mindful of local character, history and landscape. This results in a development which provides a visually interesting and well-considered built intervention to the local area, as well as providing a much-needed upgrade to the public realm at the Station including a public square.

8.7.36 Objections have been received on the issue of the Proposed Development not being in keeping with the surrounding area, and as such will affect the visual appearance of the area and also how the height may affect neighbouring amenity. However, whilst these concerns are acknowledged there are also other matters to consider:

- The site is within close proximity to a station (in this instance Arnos Grove underground station) which is considered a priority location for intensification and potentially suitable for buildings taller than the existing prevailing townscape;

- The site is brownfield land and as such is well suited to be more intensively developed including being able to absorb more density; and
- The Proposed Development is significant in size and in very close proximity to the listed Station however has been sensitively designed to ensure the Development does not dominate or overwhelm the listed building to an extent resulting in an adverse impact on the listed asset.

8.7.37 On the basis of the above the Proposed Development is considered to result in a high-quality scheme that will represent a vast improvement in public realm provision for the locality, whilst delivering a significant number of homes in well-designed buildings in a sustainable location. The Proposed Development is therefore considered to comply with relevant policies in relation to design and has been developed with cognisance of the relevant characteristics of the site and local area, particularly in relation to heritage. Planning conditions to secure quality materials and robust detailing is recommended to ensure the development is delivered to an appropriately high level of materiality and design detail.

8.8 Heritage Impact

8.8.1 Arnos Grove Station is a Grade II* listed building of unique importance to Enfield. It is one of the most highly regarded examples of Charles Holden's ground-breaking Modernist designs for the Piccadilly line extension. It is a key landmark for the local area. There is a statutory duty on decision makers to ensure the special interest of a listed building is properly considered as a material consideration when determining an application affecting its special interest or setting.

Relevant Policy and Legislation

8.8.2 In respect of listed buildings, the Planning (Listed Buildings and Conservation Areas) Act (The Act) 1990 require that all planning decisions 'should 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'. The Act places a statutory duty on decision makers to ensure 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. If harm is identified, it should be given considerable importance and weight in any planning balance. Sections 16(2) and 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990, Chapter 9, refer to setting.

8.8.3 The Revised NPPF states that when considering the impact of the proposal 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. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. Significance is the value of the heritage asset because of its heritage interest, which may be archaeological, architectural, artistic or historic, and may derive from a heritage asset's physical presence or its setting. Where a development will lead to 'less than substantial harm', the harm should be weighed against the public benefits of the proposal, including securing its optimum viable use. Chapter 16 of the Revised NPPF states that local planning authorities should require an applicant to describe the significance of

any heritage assets affected, including any contribution made by their setting. It also encourages LPAs to take account of a non-designated heritage asset in determining the application. In weighing applications that affect directly or indirectly non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm.

- 8.8.4 Paragraph 200 of the Revised NPPF states that Local planning authorities should look for opportunities for new development within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.
- 8.8.5 Adopted London Plan Policy 7.8 and Draft London Plan (ItP) Policy HC1 'Heritage conservation and growth' state that development should conserve heritage assets and avoid harm, which also applies to non-designated heritage assets. Adopted Enfield Core Policy 31 (Built and Landscape Heritage) requires that special regard be had to the impacts of development on heritage assets and their settings, Enfield Core Policy 30 supports high-quality and design-led public realm. DMD 44 (Preserving and Enhancing Heritage Assets) requires that developments should conserve and enhance the special interest, significance or setting of a heritage asset. DMD 37 (Achieving High Quality and Design-Led Development) requires that Development must be suitable for its intended function and improve an area through responding to the local character, clearly distinguishing public and private spaces, and a variety of choice. Making Enfield: Enfield Heritage Strategy 2019-2024 SPD (2019) is also relevant.
- 8.8.6 Historic Environment Good Practice Advice in Planning Note 3 provides information on good practice in relation to assessing impacts on the setting of heritage assets. Of note in the GPA is the inclusion of the consideration of views and whether there would be any impact to the significance of the views on the heritage asset as a result of the development. However, it is of note that a distinction is made between views that contribute to heritage significance and those valued for other reasons.
- 8.8.7 Historic England guidance entitled *The Setting of Heritage Assets, 2015* states: *"Where the significance of a heritage asset has been compromised in the past by unsympathetic development affecting its setting, to accord with NPPF policies, consideration still needs to be given to whether additional change will further detract from, or can enhance, the significance of the asset. Negative change could include severing the last link between an asset and its original setting; positive change could include the restoration of a building's original designed landscape or the removal of structures impairing views of a building."* [p.4]

Site and Immediate Setting - Heritage context

- 8.8.8 The application site surrounds the Grade II* listed Arnos Grove underground station. Arnos Grove Underground Station and the station and its platforms are Grade II* listed. Grade II* buildings account for 5.5% of all listed buildings included on the National Heritage List and are deemed to have more than special architectural and historic interest. Structurally the building consists of a reinforced-concrete loadbearing frame with brick infill. The frame is clad in Buckinghamshire red and Staffordshire brindled blue brick with flat concrete slab roofs with dentiled soffits over.

8.8.9 The station is a landmark in the area and features an impressive interior space. Several walls extending either side of the main station (and lampposts) also form part of the listed curtilage designation. The Historic England listing description refers to the building's architectural and historic interest and intactness. The Station was opened on 19 September 1932 as part of the northern extension of the Piccadilly Line from Finsbury Park. Since then, it has become a key landmark for the local area. The station was originally granted Grade II listed status in 1971 which was upgraded to Grade II* in 2011 to reflect the building's status as an icon of British Modernist architecture.

8.8.9 The description states the following principle reasons for its designation:

- **architectural interest:** *a striking design with a prominent circular booking hall providing both an effective landmark and hugely impressive interior space. Its large panels of glazing making it particularly evocative when lit at night);*
- **historic interest:** *probably the most highly regarded example of Charles Holden's ground-breaking Modernist designs for the Piccadilly Line extensions of the early 1930s. These were of great importance for introducing rational modern design based on continental models to a wider public and for imposing a brand image to buildings and design when this was still novel. They were widely praised in the architectural press at the time and remain influential today;*
- **intactness:** *the station is largely unaltered and retains notable features such as the passimeter and telephone kiosks in the booking hall and platform structures.*

8.8.10 The Applicant has submitted a Heritage Assessment in accordance with NPPF and adopted policy requirements DMD 44, which sets out a clear understanding of the historic environment and background to the heritage-led design development. Substantial pre-application discussion was undertaken in the assessment of the scheme, to ensure that the special interest of the listed building and setting were carefully considered. This included reduced the height of the two blocks closest to the station during the pre-application process so as not to detract from the prominence of the station building. Key design principles were set early in the design process to maintain and enhance the station's significance. This heritage-led design approach is in accordance with best practice, policy and guidance.

8.8.11 *Layout, height and massing:* The Heritage Statement submitted in support of the application notes that while alternative schemes to increase the height both in concentrated locations and more generally across the Sites were tested – these were discarded as inappropriate due to the adverse impact that taller buildings would have on sensitive views of the Arnos Grove Station Building ticket hall drum approaching from both directions along Bowes Road. Consequently, the height of the proposed buildings has been kept relatively low across the site, while the massing has been varied to prevent the impression of the creation of a wall of development behind the station. A pergola structure which was also proposed during pre-application, but which was not supported by Enfield's independent Design Review Panel – due to its

potential impact on the setting of the listed building was also removed. A detailed assessment of layout, height, scale and massing is set out above.

- 8.8.12 Officers consider the proposal successfully enhances the setting of the listed station. The Officer assessment is supported by the views submitted by the Enfield Society, who consider the scheme protects the views of this important landmark building and that the development will provide an improved setting compared to the existing car park arrangements. The Enfield Society supports the proposal. The Society is represented on the former Conservation Advisory Committee and have noted that that group was also broadly supportive of the scheme (provided there was strict conditioning of materials). Historic England have not raised any objection. The Greater London Authority have concluded that the setting, historic and architectural significance of the listed building would also be preserved and enhanced by the development. Therefore, no harm is caused to the significance of the Grade II* listed Arnos Grove station.
- 8.8.13 The proposal is considered to preserve the setting of the listed building and in the wider townscape context would enhance its setting through sensitive architecture and design. The resultant development would also provide a new public square to the west of the building that would improve access to and the public experience of the building and thereby enhance its historic significance. The development is also largely deferential to the station, which remains the focal point in the local townscape, thereby preserving its architectural significance and its intactness.
- 8.8.14 The Design Review Panel noted in its final review that it supported the principle of protecting the silhouette and shape of the drum by working to not place buildings behind it. The proposals would result in an improved setting, including through the introduction of a new public square to the west of the station building. The design of the scheme is assessed as having sympathetically responded to this important designated heritage asset – positively preserving and enhancing it.
- 8.8.15 In respect of the impact of the scale and massing on the booking hall large panels of glazing (and internal daylight of the booking hall) Officers have reviewed submitted material and are satisfied the scheme would not result in a detrimental impact on the light coming into the station – and important element of the station's *architectural* interest. The proposals would not alter internal station features – so would have no impact on the internal '*intactness*' of the building.
- 8.8.16 Given the above, it is considered that no harm is caused to the significance of the Grade II* listed Arnos Grove station as a result of the Proposed Development. The proposal is assessed as enhancing the setting of the listed station.

Wider Setting – Heritage Context

- 8.8.17 As noted above TVIA views were agreed at pre-application stage with LB Enfield and Historic England. Enfield's Conservation Officers have assessed that no adverse impact is found on surrounding heritage assets from the proposed development, in terms of scale and massing (see above).

8..8.18 Enfield's Conservation Officers have concluded that the proposed heights and siting of buildings ensure that a sense of hierarchy is maintained across the site, that the listed building is not dominated by any new development and that its setting is preserved. The transition in scale to address the change in heights between both the proposed scheme and Arnos Arms (non-designated heritage asset), and the Grade II* listed station building are well conceived.

8.8.19 Arnos Park is a local listed heritage asset, the significance of which is derived from its age, rarity, historic association, landmark status, designed landscape, social value and aesthetic merit (Enfield Local Heritage List, 2018). The submitted Heritage Statement states that 'the proposed development will be visible above the tree canopy in views south from within the central open area of the park, where no urban development is currently visible. This lack of development above the canopy contributes to the designed nature and aesthetic merit of the park, so the visibility of the proposed development will cause some harm to the park's significance'. The statement goes on to note that 'many elements of the park's character are derived from its proximity to urban development. During the winter, the surrounding residential streets are clearly visible beyond the boundary of the park'. As noted above, Officers have undertaken careful assessment, including site visits to consider potential impacts across the area, including Arnos Park. Officers agree with the conclusions of the Heritage Statement that the degree of harm, with mitigation, would be less than substantial by virtue of the park's existing character – which is already established as a designed landscape (Enfield Local Heritage List, 2018) bordered by existing development.

Public Realm Improvements/ Enhancements to Setting of Grade II Listed Building*

8.8.20 The existing car parks at Arnos Grove Underground Station are not part of the station's designed setting. The existing arrangement are of low townscape quality. The create a cap in the streetscape and along the high street. The car parks are assessed as not contributing towards to station's significant and can be considered to detract from its station's significance.

8.8.21 The proposal includes the formation of a public space/square, affording a degree of breathing space and an enhanced setting to the Grade II* listed station, and Officers are in support of this.

8.8.22 Attempts to enclose the blue badge parking area are welcomed. It is acknowledged that above and below ground site constraints will prohibit any potential improvements to the gable end wall of 348 Bowes Road. Whilst the details submitted for approval do not cover the bus stop area, it is understood this element of the scheme has been included within the red line boundary to allow for works to be undertaken via a Section 278 (Highways) agreement.

8.8.23 The Proposal includes part demolition of the listed car park wall which is supported in principle, subject to the submission of further details to be submitted via planning condition. Likewise details of other proposed associated works including the relocation and restoration of four lampposts; works to the walls and railings on the north and south sides of the forecourt; and works to the wall on the west side of the forecourt will be required via planning condition.

Design and Materials

- 8.8.24 The proposed brickwork will provide a simplistic, classical appearance which will not compete with the station and horizontal breaks created by concrete banding and the sculptural use of curved balconies are considered sufficient in this instance to break up façade. Bronze is proposed in balcony details, windows and railings and take cues from the characteristic bronze detailing found in Holden's station and these elements are supported. Details of all materials are required to be submitted via planning condition to ensure the proposed high-quality design is delivered on site.

Archaeology

- 8.8.25 No archaeological finds or features are recorded in the Greater London Sites and Monuments Record from this area, nor is the area designated as an area of archaeological interest. While the site has a long occupation history, it is unlikely that any remains of archaeological significance have survived the intensive redevelopment of the area in the later 19th and 20th centuries. However, a suitably worded archaeological condition is proposed, to ensure any buried remains are protected.

Conclusion of Heritage Impact

- 8.8.26 The Proposed Development has evolved to take account of its heritage setting and the applicants have tailored the design to specifically use a sensitive style of architecture that includes strong modernist and art deco elements in reference to the station. Enfield's Conservation Officers have concluded that the listed building is not dominated by the proposal and that – its setting is preserved and enhanced, overall.
- 8.8.27 The proposal has been carefully assessed against the requirements of Section 66(1) of Planning (Listed Buildings and Conservation Areas) Act 1990, London Plan Policy (2016) 7.8, Enfield adopted Core Policy 30 and 31 and DMD 37 and 44 and the NPPF, including giving careful consideration to the three key factors LPAs are required to consider in determining proposals that affect heritage assets (NPPF paragraph 189 - 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) and Historic England guidance 'The Setting of Heritage Assets [2015]'.

8.9 Neighbouring Amenity Considerations

- 8.9.1 London Plan Policy 7.6 sets out that buildings should not cause unacceptable harm to residential amenity, including in terms of privacy and overshadowing. Emerging 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. Meanwhile Policy CP30 of the Local Plan 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. Lastly

Enfield 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.

Daylight/Sunlight

BRE Guidance - Daylight and Sunlight:

- 8.9.2 In general, for assessing the sunlight and daylight impact of new development on existing buildings, Building Research Establishment (BRE) criteria is adopted. In accordance with both local and national policies, consideration has to be given to the context of the site, the more efficient and effective use of valuable urban land and the degree of material impact on neighbours.
- 8.9.3 BRE Guidelines paragraph 1.1 states: *"People expect good natural lighting in their homes and in a wide range of non-habitable buildings. Daylight makes an interior look more attractive and interesting as well as providing light to work or read by"*. Paragraph 1.6 states: *"The advice given here is not mandatory and the guide should not be seen as an instrument of planning policy; its aim is to help rather than constrain the designer. Although it gives numerical guidelines, these should be interpreted flexibly since natural lighting is only one of many factors in site layout design..."*.

BRE Guidance – Daylight to Existing Buildings:

- 8.9.4 The BRE Guidelines stipulate that... *"the diffuse daylighting of the existing building may be adversely affected if either:*
- the VSC [Vertical Sky Component] measured at the centre of an existing main window is less than 27%, and less than 0.8 times its former value*
- the area of the working plane in a room which can receive direct skylight is reduced to less than 0.8 times its former value."* (No Sky Line / Daylight Distribution).
- 8.9.5 At paragraph 2.2.7 of the BRE Guidelines it states: *"If this VSC is greater than 27% then enough skylight should still be reaching the window of the existing building. Any reduction below this level should be kept to a minimum. If the VSC, with the development in place is both less than 27% and less than 0.8 times its former value, occupants of the existing building will notice the reduction in the amount of skylight. The area of lit by the window is likely to appear more gloomy, and electric lighting will be needed more of the time."*
- 8.9.6 The BRE Guidelines state (paragraph 2.1.4) that the maximum VSC value is almost 40% for a completely unobstructed vertical wall.
- 8.9.7 At paragraph 2.2.8 the BRE Guidelines state: *"Where room layouts are known, the impact on the daylighting distribution in the existing building can be found by plotting the 'no sky line' in each of the main rooms. For houses this would include living rooms, dining rooms and kitchens. Bedrooms should also be analysed although they are less important... The no sky line divides points on the working plane which can and cannot see the sky... Areas beyond the no sky line, since they receive no direct daylight, usually look dark and gloomy compared with the rest of the room, however bright it is outside"*.

- 8.9.8 Paragraph 2.2.11 states: *Existing windows with balconies above them typically receive less daylight. Because the balcony cuts out light from the top part of the sky, even a modest obstruction may result in a large relative impact on the VSC, and on the area receiving direct skylight.* The paragraph goes on to recommend the testing of VSC with and without the balconies in place to test if it the development or the balcony itself causing the most significant impact.
- 8.9.9 The BRE Guidelines at its Appendix F gives provisions to set alternative target values for access to skylight and sunlight. It sets out that the numerical targets widely given are purely advisory and different targets may be used based on the special requirements of the proposed development or its location. An example given is *“in a mews development within a historic city centre where a typical obstruction angle from ground floor window level might be close to 40 degree. This would correspond to a VSC of 18% which could be used as a target value for development in that street if new development is to match the existing layout”*
- 8.9.10 Paragraph 1.3.45-46 of the Mayor of London’s Housing SPD states that:
- ‘Policy 7.6Bd requires new development to avoid causing ‘unacceptable harm’ to the amenity of surrounding land and buildings, particularly in relation to privacy and overshadowing and where tall buildings are proposed. An appropriate degree of flexibility needs to be applied when using BRE guidelines to assess the daylight and sunlight impacts of new development on surrounding properties, as well as within new developments themselves. Guidelines should be applied sensitively to higher density development, especially in opportunity areas, town centres, large sites and accessible locations, where BRE advice suggests considering the use of alternative targets. This should take into account local circumstances; the need to optimise housing capacity; and scope for the character and form of an area to change over time.
- 8.9.11 The degree of harm on adjacent properties and the daylight targets within a proposed scheme should be assessed drawing on broadly comparable residential typologies within the area and of a similar nature across London. Decision makers should recognise that fully optimising housing potential on large sites may necessitate standards which depart from those presently experienced, but which still achieve satisfactory levels of residential amenity and avoid unacceptable harm.’

BRE Guidance - Sunlight to Existing Buildings:

- 8.9.12 The BRE Guidelines (2011) state in relation to sunlight at paragraph 3.2.11: *“If a living room of an existing dwelling has a main window facing within 90 degrees of due south, and any part of a new development subtends an angle of more than 25 degrees to the horizontal measured from the centre of the window in a vertical section perpendicular to the window, then the sunlighting of the existing dwelling may be adversely affected. This will be the case if the centre of the window:*
- *Receives less than 25% of annual probable sunlight hours, or less than 5% of annual probable sunlight hours between 21 September and 21 March and*

- *Receives less than 0.8 times its former sunlight hours during either period and has a reduction in sunlight received over the whole year greater than 4% of annual probable sunlight hours."*

8.9.13 The BRE Guidelines state at paragraph 3.16 in relation to orientation: *"A south-facing window will, receive most sunlight, while a north-facing one will only receive it on a handful of occasions (early morning and late evening in summer). East and west-facing windows will receive sunlight only at certain times of the day. A dwelling with no main window wall within 90 degrees of due south is likely to be perceived as insufficiently sunlit."*

8.9.14 They go on to state (paragraph 3.2.3): *"... it is suggested that all main living rooms of dwellings, and conservatories, should be checked if they have a window facing within 90 degrees of due south. Kitchens and bedrooms are less important, although care should be taken not to block too much sun."*

BRE Guidance - Open Spaces:

8.9.15 The Guidelines state that it is good practice to check the sunlighting of open spaces where it will be required and would normally include: *'gardens to existing buildings (usually the back garden of a house), parks and playing fields and children's playgrounds, outdoor swimming pools and paddling pools, sitting out areas such as those between non-domestic buildings and in public squares, focal points for views such as a group of monuments or fountains'.*

8.9.16 At paragraph 3.3.17 it states: *"It is recommended that for it to appear adequately sunlit throughout the year, at least half of a garden or amenity area should receive at least two hours of sunlight on 21 March. If as a result of new development an existing garden or amenity area does not meet the above, and the area which can receive two hours of sun on 21 March is less than 0.8 times its former value, then the loss of sunlight is likely to be noticeable. If a detailed calculation cannot be carried out, it is recommended that the centre of the area should receive at least two hours of sunlight on 21 March."*

8.9.17 Whilst the BRE guidelines are not mandatory, the suitability of a proposed scheme for a site within the context of BRE guidance is largely the accepted approach. When reviewing the findings of a daylight/sunlight assessment, consideration will be given to the urban context within which a scheme is located, and daylight/sunlight will be one of a number of planning considerations which is considered.

Daylight/Sunlight Analysis

8.9.18 Some concerns have been raised during the consultation process from neighbouring properties in respect of the impact of the proposed development on surrounding daylight and sunlight leading to an impact on residential amenity.

8.9.19 A 'Daylight & Sunlight Impacts to Neighbouring Properties' report has been submitted as part of the application and based on proximity to the Proposed Development, the following properties were identified as relevant for daylight and sunlight assessment (also shown in Fig. 4 below):

Bowes Road – No's 348, 350, 352 and 354
 Brookdale - No's 1, 3, 5, 7, 9, 11, 13, 15, 17, 19, 21, 23, 25, 27, 29 and 31
 Walker Close – No's 1, 2, 3, 4, 5, 6 and 27
 Arnos Road – No's 3, 5, 7, 9, 11, 13, 15, 17, 19 and 21
 The Arnos Arms 338 Bowes Road



Fig. 4: Properties identified for analysis (Plan view) – note the numbers do not indicate individual property numbers and are shown for analysis purposes



Fig. 5: showing relationship of surrounding properties in relation to the proposed development

8.9.20 On Site A, nearest to Brookdale the proposed buildings are at least 33.5m away from the rear façade of existing properties. On Site B, nearest to Arnos Road the proposed buildings are at least 34.5m distance from the rear façade of existing properties. On Brookdale and Arnos Road, the rear of the properties typically accommodate lounge/kitchen/diners at ground floor and bedrooms at first floor. Desktop research indicates that existing properties in Brookdale and Arnos Road are dual aspect and would therefore have more than one good light source throughout the course of the day. However the distances between existing properties and the proposed buildings exceed the minimum required distance of 30m set out by DMD10 and far exceeds the minimum recommended distance of 18-21m between facing homes (habitable room to habitable room) set out in the Housing SPG.

8.9.21 The following properties were found to comply with relevant BRE Guidelines and as such were not assessed further:

Bowes Road – No's 348, 350, 352 and 354
 Brookdale - No's 1, 3, 7, 9, 25, 27, 29 and 31
 Walker Close – No 27
 Arnos Road – No's 3, 5, and 21
 The Arnos Arms (338 Bowes Road)

- 8.9.22 Of the remaining properties (than those listed in Para. 8.8.21 above) 20 will experience reductions in daylight and/ or sunlight, as follows:

Brookdale - 5, 11, 13, 15, 17, 19, 21 and 23

Walker Close - 1, 2, 3, 4, 5 and 6

Arnos Road - 7, 9, 11, 13, 15, 17 and 19

- 8.9.23 Further assessment of these properties found that whilst they would experience reductions in daylight and/ or sunlight they would still exceed the numerical targets set out in the BRE Guidelines. Across these properties 95 rooms and 119 windows were assessed for changes in daylight (VSC and NSL) and 33 rooms with 37 windows were assessed for changes in sunlight (APSH). A short summary is given below for each property where a reduction in daylight and/ or sunlight is predicted. For the purposes of the assessment only habitable, (or rooms believed to be habitable from desktop research findings) were assessed. Habitable rooms do not include rooms such as bathrooms, cloakrooms, hallways or utility rooms etc.

Conclusion of Daylight & Sunlight

- 8.9.24 The deeper assessment concluded that 68.9% of the windows assessed meet the BRE standards and a majority of the remaining windows that do not meet the guidelines are only marginally affected by the proposals, and either continue to achieve a level (20% or more) that GLA guidance considers to be reasonably good and appropriate in an urban environment or do not currently meet the minimum standard (without the development in place).
- 8.9.25 The assessment found that of the 95 rooms 76.9% fully comply with the criteria set out in the BRE Guidelines. The remaining rooms are predominantly bedrooms where this measure is less relevant as bedrooms are mainly used for sleeping and continue to have a good view of the sky.
- 8.9.26 The APSH assessment conclude that 83.3% of those windows assessed fully comply with the BRE criteria and the remainder would not be impacted disproportionately when assessed in the context of the urban environment.
- 8.9.27 It is recognised that some reductions are attributable to the design of particular buildings, and whilst there is a breach of the BRE Guidelines in relation to the daylight levels, the retained levels within the property are considered to be appropriate given that the low existing values are causing disproportionate percentage alterations and given the urban grain of the location.
- 8.9.28 In relation to sunlight, as noted above the majority of the properties assessed remain fully compliant with BRE Guidelines (compliance at 89.8% of the rooms assessed). Where there are derogations from guidance are noted, these are relatively minor in nature and there are mitigating reasons for them such as the orientation of the windows and/or property. Notwithstanding, overall the sunlight levels will remain adequate as a result of the implementation of the Proposed Development.
- 8.9.29 Also as noted above some departures to the BRE Guidance occur. However, the deviations are considered to be acceptable when viewed in relation to the location of the site, the quantum of development being proposed and the

unique existing scenario of the undeveloped car parks which would by default have little or no impact. As such, any modest size development would have some level of impact.

8.9.30 The marginal transgressions when assessed against the BRE guidance are experienced by properties surrounding the site, however still meet the standards set out by the GLA when taking the local urban typology into consideration. The proposed buildings have been located away from the boundaries of the site, which minimises the impacts on neighbouring properties. Furthermore, despite some properties experiencing some transgressions of daylight and sunlight against the BRE standards, this is considered acceptable in the urban environment of Arnos Grove and accords with the standards accepted by the Housing SPG. In accordance with this criteria, the neighbouring properties are considered to achieve suitable levels of residential amenity with the Development in place.

8.9.31 In conclusion the impacts of the Proposed Development in relation to daylight and sunlight are considered to be limited given the scale of the development and the urban nature of the local area, with levels of daylight and sunlight in most of the neighbouring residential properties remaining largely unaffected by the proposals.

Overshadowing

8.9.32 In addition to the above daylight and sunlight assessment the applicants also undertook an overshadowing analysis of nearby properties. Thirty-three (33) properties in the immediate vicinity of the site with identified external amenity space were assessed for impact as follows:

- Rear gardens of 1-31 (odd) Brookdale;
- Rear Gardens of 1-6 Walker Close; and
- Rear Gardens of 1-21 Arnos Road

8.9.33 The overshadowing assessment found as follows:

Rear gardens of 1-31 (odd) Brookdale:

- The Sun Hours on Ground assessment demonstrates that the availability of sunlight to this area will not be materially impacted;
- The rear gardens all see a minimal reduction ranging from 0.01%-4.33% of the area receiving direct sunlight for at least two hours on the equinox; and
- All gardens have at least 88%-100% of their area receiving direct sunlight for at least two hours on this date with the proposed development in place, well exceeding the 50% recommendation (in BRE guidelines).

Rear gardens of 1-6 Walker Close:

- The Sun Hours on Ground assessment demonstrates that the availability of sunlight to this area will not be materially impacted;
- The rear gardens all see a minimal reduction ranging from 0.00%-0.04% of the area receiving direct sunlight for at least two hours on the equinox; and
- All gardens have at least 99%-100% of their area receiving direct sunlight for at least two hours on this date with the proposed development in place, well exceeding the 50% recommendation (in BRE guidelines).

Rear gardens of 1-21 Arnos Road:

- The Sun Hours on Ground assessment demonstrates that the availability of sunlight to this area will not be materially impacted;
- The rear gardens all see a minimal reduction ranging from 0.04%-6.65% of the area receiving direct sunlight for at least two hours on the equinox; and
- All gardens have at least 83%-99% of their area receiving direct sunlight for at least two hours on this date with the proposed development in place, well exceeding the 50% recommendation (in BRE guidelines).

Conclusion of Overshadowing

8.9.34 The BRE Guidelines suggests that 'Sun Hours On Ground' assessments should be undertaken on the Spring Equinox (21st March). With regards to overshadowing of amenity spaces BRE Guidelines states that "for it to appear adequately sunlit throughout the year, at least half of a garden or amenity area should receive at least two hours of direct sunlight on 21 March. If as a result of new development an existing garden or amenity area does not meet the above guidance, and the area which can receive two hours of sun on 21st March is less than 0.8 times its former value, then the loss of sunlight is likely to be noticeable".

8.9.35 An assessment of neighbouring rear gardens shows they would not be materially impacted by the proposals, and minor overshadowing impacts will not be perceptible. With the development in place, all neighbouring gardens continue to receive sunlight within at least 83% of their area for at least two hours on the equinox with the development in place. This exceeds the minimum of 50%, with many receiving it across 100% of their area. Therefore, given these results it is considered that the overshadowing impacts to each garden is acceptable.

Privacy, Overlooking and Outlook

8.9.36 Draft London Plan (ItP) Policy D6 notes that development proposals should provide sufficient daylight and sunlight to new and surrounding housing. Adopted London Plan (2016) Policy 7.6Bd requires new development to avoid causing 'unacceptable harm' to the amenity of surrounding land and buildings, particularly in relation to privacy and overshadowing and where tall buildings are proposed. It notes the need for an appropriate degree of flexibility when using BRE guidelines to assess the daylight and sunlight impacts of new development on surrounding properties, as well as within new developments themselves. Guidelines should be applied sensitively to town centres and accessible locations, where BRE advice suggests considering the use of alternative targets – taking into account local circumstances; the need to optimise housing capacity; and scope for the character and form of an area to change over time.

8.9.37 The Mayor of London's Housing SPG does not support adhering rigidly to visual separation measures as they can limit the variety of urban spaces and housing types in the city. Standard 28 of the Mayor of London's Housing SPG states that design proposals should demonstrate how habitable rooms within each dwelling are provided with an adequate level of privacy in relation to neighbouring property, the street and other public spaces.

- 8.9.38 Adopted Enfield Policies DMD 6 and 8 seek to ensure residential developments do not prejudice the amenities enjoyed by the occupiers of neighbouring residential properties and Policy CP30 of the Local Plan 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. Adopted Enfield 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. Adopted Enfield Policy DMD10 is silent on this type of relationship, but requiring that development not compromise adjoining sites.
- 8.9.39 The Site is adjacent to Arnos Grove Underground Station partially within a Local Centre and is Urban in character. Whilst the development will be somewhat larger and taller than the existing buildings, it will not be untypical of buildings located in urban locations.
- 8.9.40 The positioning and massing of the buildings has sought to keep taller elements to the north of the site, away from the station and the frontage, as well as away from the neighbouring properties. The topography of the site means that it drops steeply to the north, on both Site A and Site B, reducing perceived height by utilising the downward slope.
- 8.9.41 The Proposed buildings are set away from existing housing so far as possible to minimise any potential for overlooking and/or overshadowing of neighbouring properties. In terms of specific distances, the Proposed buildings are approximately 33.5m away from the rear façade of existing properties on Site A and approximately 34.5m distance on Site B. Communal gardens and access routes have been located to the east and west boundaries consistent with residential fronts and backs.
- 8.9.42 The distances between existing and proposed homes are considered proportionate, within an urban setting. Moreover, currently this is a public car park allowing people to stand directly to the rear of private gardens of existing homes along Brookdale, Walker Close and Arnos Road. The existing situation results in members of the public having direct views into the rear gardens and in some cases, into the living spaces of existing homes.
- 8.9.43 The proposals include densely planted boundary and fencing to provide security and privacy to adjacent gardens at ground. This proposed arrangement is considered to echo traditional back-to-back gardens, introducing a garden-to-communal green relationship and would reduce direct overlooking into rear gardens at ground level.
- 8.9.44 At upper levels, in addition to the separation distances set out above an 800mm raised sill to windows is used throughout the scheme for bedrooms and secondary windows to living spaces. This provides both greater privacy for future occupiers of the Development and mitigates overlooking of neighbouring gardens. Tightly spaced stanchions are proposed to the lower portion of balconies – to mitigate overlooking.

Summary of Privacy, Overlooking and Outlook

- 8.9.45 The siting of the Proposed buildings in relation to nearby occupiers are of enough distance to protect amenity of existing neighbouring occupiers as well as future occupiers of the Development. Communal gardens and access routes have been located to the east and west boundaries of the proposed buildings to echo the traditional fronts and backs pattern found in nearby residential properties. In addition, screening will be provided in the way of planting and fencing to provide further privacy. Screening, fencing and boundary treatments will be subject to approval of details via a planning condition.
- 8.9.46 The proposals include set-backs and buffers in line with Standard 28 of the Mayor of London's Housing SPG – and would not cause unacceptable harm to the amenity of surrounding land and buildings, particularly in relation to privacy and overshadowing.
- 8.9.47 A change in the relationship between the existing homes will take place, which is typical of managed change in an urban location, and not considered significant enough for the development not to be supported particularly as the proposals exceed traditional and past planning guidance 'yardstick' for privacy of 18 – 21m (between habitable room and habitable room).
- 8.9.48 Subject to conditions, requiring full details of the proposed screening and boundary treatment throughout the Site, the Proposed Development is considered acceptable in terms of privacy, overlooking and/or outlook.

Noise and Disturbance

- 8.9.48 Guidance relevant for the assessment of noise affecting new developments is given in the February 2019 National Planning Policy Framework (NPPF). Paragraph 180 sets out that that new development should be appropriate for its location, taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should seek to a) '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'.
- 8.9.49 Meanwhile Policy D14 of the London Plan (Intend to Publish) sets out that in order to reduce, manage and mitigate noise to improve health and quality of life, residential... development proposals should manage noise by, amongst other things: '3) mitigating and minimising the existing and potential adverse impacts of noise on, from, within, as a result of, or in the vicinity of new development without placing unreasonable restrictions on existing noise-generating uses', and '4) improving and enhancing the acoustic environment and promoting appropriate soundscapes...'. Lastly, London Plan (Intend to Publish) introduces the concept of 'Agent of Change' which places the onus on the new development to ensure adequate noise mitigation measures are in place if their development will be close to a noise generating use (in this instance the Arnos Arms is in close proximity and the proposed commercial unit at the front of building A01 has the potential to generate some level of noise).

- 8.9.50 The proposed residential development is consistent with the existing prevailing residential use in the area and it is therefore unlikely that any unacceptable levels of noise will be generated as result of the residential element of the development. The proposal also includes an 89sq.m commercial unit which will be used either in a retail, restaurant, café or drinking establishment capacity. The unit will be located at ground floor level in building A01, overlooking the proposed square. In order to protect the amenity of existing nearby occupiers and future occupiers of the Development, a condition is recommended restricting opening and operational hours of the commercial unit. Subject to this condition the commercial unit would not be considered likely to give rise to any unacceptable adverse amenity impact in terms of noise and disturbance. In addition, the managed nature of the development will also provide extra measures to deal with any unexpected noise disturbance should they arise.
- 8.9.51 With regards to noise impact to future occupiers of the Development as a result of proximity to the railway lines, the submission documents include a Noise and Vibration Assessment which recommends mitigation measures are implemented to address groundborne noise and vibration impact. These measures could include suitable glazing and ventilation and vibration isolation intervention above the foundations of the four buildings. In order for noise and vibration levels to remain at an acceptable level a planning condition is recommended to secure this in line with relevant policy and guidance as outlined above.
- 8.9.52 With regards to occupier amenity it is recognised that most developments in urban areas will be subject to noise levels above the BS8233 recommended levels for balconies. However, it is reasonable to assume that future occupiers would prefer the option to have a noisier balcony as opposed to having no balcony at all.
- 8.9.53 Furthermore, it is acknowledged that there are no other noise mitigation measures available for balconies other than fully enclosing them (i.e. 'winter gardens'), which essentially changes the balconies into internal rooms. On this basis the development is considered acceptable in relation to noise levels in external to private amenity areas.

Light Pollution

- 8.9.54 It is recognised that that there is the potential for some level of light pollution arising from the development. Whilst it is acknowledged that a large development will likely generate significantly more light than the existing car parks, a planning condition is recommended requiring details of external light spill and light spill to internal communal areas to safeguard against adverse impact. In relation to individual residential units, it is not considered light generating from the flats would be unreasonable given they are expected to be used in a normal residential fashion.

Conclusion of Neighbouring Amenity Considerations

- 8.9.55 Whilst concern has been raised by local residents in relation to loss of daylight/sunlight arising from the development the proposal is not considered to result in sufficient harm to render the scheme unacceptable. It is also noted that concern has been raised from people living a sufficient enough distance from the development that they have not been included in the analysis. As

such, taking into account existing levels of light to the properties and the urban context of the site, it is considered that the analysis satisfactorily demonstrates that whilst there are some deviations, these are not significant enough to warrant the scheme unacceptable, particularly in the context of the urban setting of the development, whereby some impact is expected to occur. This approach is in line with BRE guidance and policy and the Proposed Development is therefore considered acceptable in terms of daylight and sunlight impact to neighbouring occupiers.

8.9.56 In terms of outlook, privacy and overlooking as outlined above in the siting of the proposed buildings in relation to nearby occupiers are of sufficient distance to protect amenity of existing neighbouring occupiers as well as future occupiers of the Development.

8.9.57 With regards to potential noise and disturbance arising from the use/occupation of the development it is noted that there is some level of concern from neighbouring occupiers in relation to this. It is also noted that there is concern that existing noise and disturbance could become worse however as a result of new measures in terms of vehicle movements and drops-offs, and improved building fabric and internal noise mitigation measures, it is considered that the opposite will likely occur. That is, the proposed new measures, will result in a quieter facility, despite the intensification of the use.

8.9.58 Notwithstanding the above, subject to conditions pertaining to noise levels and light spill, the Proposed Development is considered acceptable in terms of amenity impact to neighbouring occupiers and is in line with relevant policies DMD 8, 37 & 68, CS Policy 4, London Plan (Intend to Publish) Policies D4, D6 and D14 and existing London Plan Policies 3.5 & 7.15.

8.10 Transport Considerations

8.10.1 Core Strategy (2010) policies 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. Specifically, Core Policy 25 requires development to prioritise pedestrian and cycle public realm improvements that contribute to quality and safety; Core Policy 24 requires development to deliver improvements to the road network, and Core Policy 26 requires development to ensure a safe, accessible, welcoming and efficient public transport network. The underlying approach is to ensure that travel choice across the Borough is enhanced so as to provide everyone with the opportunity to decide how they choose to travel, be that by car, public transport or walking and cycling.

8.10.2 Development Management Document (2014) Policy DMD 45 Parking Standards and Layout states that the Council aims to minimise car parking and to promote sustainable transport options.

8.10.3 London Plan (2016) Policy 6.1 encourages partnership working in terms of transport and development that reduce the need to travel, especially by car whilst also supporting development with high levels of public transport accessibility and/or capacity. The policy also supports measures that encourage shifts to more sustainable modes of transport.

- 8.10.4 London Plan (Intend to Publish) Policy T1 and the Mayor's Transport Strategy set out an ambition for 80% of journeys to be made by sustainable transport modes – that is by foot, cycle or public transport – by 2041. In keeping with this approach, it is accepted that proposed development should support this aim by making effective use of land, reflective of connectivity and accessibility by sustainable travel modes. Meanwhile, the Mayor's 'Healthy Streets' driver looks to reduce car dominance, ownership and use, whilst at the same time increasing walking, cycling and public transport use.
- 8.10.5 London Plan (Intend to Publish) Policy T2 requires development to facilitate and promote short, regular trips by walking or cycling and reduce car dominance. Meanwhile intend to publish London Plan Policy T6 sets out the requirement for car-free development to be the starting point for all sites well-connected by public transport. Lastly intend to publish Policy T9 notes that where development is car free, provision must be made for disabled persons parking and adequate space for deliveries and servicing and, in instances where a car-free development could result in unacceptable impacts off-site, these should be mitigated through planning obligations.
- 8.10.6 Parking, highway and pedestrian conflict and increased traffic levels has been cited as a concern from neighbouring properties. To that end the Council's Transportation Team has advised that the Transport Assessment and assorted appendices submitted have considered the transportation aspects, impacts and appropriate mitigation for the Proposed Development.
- 8.10.7 The Proposal is considered to be very well placed for access to public transport services and is located in an area of formal parking control (Arnos Grove CPZ 11am to 12noon). However, there is potential for a number of potential impacts to arise and as such suitable mitigation will be necessary to manage these to make the development acceptable in transportation terms.

Assessment

- 8.10.8 *Existing conditions:* The site is directly adjacent to the London Underground Station and has a PTAL rating of 4 to 6a (with 6a being excellent) with access to the Piccadilly line and good bus connections including a bus interchange at the front of the Site.
- 8.10.8 There are four bus stops in the area: stops U, T, A and B, which serves routes 34, 184, 232, 251, 298, 382 and N91 which provide connections to destinations including Palmers Green, Walthamstow Central, Barnet, Turnpike Lane Station, Potters Bar, Edgware Road, and Southgate. A wide catchment area is served by the bus routes. The bus interchange is currently used for through routes and terminating routes. There are local cycle routes along the northern side of the A406 and through Arnos Park (connecting to Ashridge Gardens). Minor improvements will be made to the bus interchange in the way of the relocation on one bus stop to allow for associated works to the public realm and pedestrian and cycle infrastructure.
- 8.10.9 The site's PTAL rating of excellent (6a), and the range of public transport services to the station and from the station provide a variety of travel destinations via both the London Underground and the bus networks.
- 8.10.10 The availability of the existing car parking is encouraging some people to drive to the station rather than use the public transport that is available.

8.10.10A taxi facility, which can accommodate two taxis, has been shown within the bus interchange design.

Existing Public Transport Capacity

10.10.11 Preliminary transport surveys undertaken by the developers identified that the existing car park may encourage journeys by private car and the trip origin of up to 99% of car park users is within walking distance of an underground station, railway station or bus stop, whilst the remaining 1% have a station or bus stop closer to their trip origin than Arnos Grove Station.

10.10.12 The applicants transport survey suggests that removing the car park would discourage unsustainable patterns of travel behaviour currently experienced at Arnos Grove – encouraging users to consider sustainable travel alternatives.

10.12.13 In terms of existing public transport capacity, the submitted Transport Assessment has identified a potential average increase of 2 to 3 people on each bus service during the morning and evening peak, which is considered to have a negligible impact on public transport capacity.

Parking assessment

10.12.14 There are two aspects to the parking assessment: There is the loss of the station parking; and the 'car-free' approach in respect of the residential development (apart from the blue badge spaces). The existing and proposed car parking provision is as follows:

Table 5: Existing and proposed car parking provision

	Station Parking (general)	Station Parking (Blue Badge)	LUL	Blue Badge (residential)	Total
Existing	297	6	10	0	313
Proposed	0	6	10	5 (+11 passive)	21

Loss of existing car parking and dispersion

10.12.15 Significant objection has been raised from the consultation process in relation to the potential for displacement of car parking – resulting from the loss of the existing car park. The potential impact of losing the 292 spaces is that users of the station will either: find alternative ways to get to work and travel to other destinations; relocate to other stations; or park outside the existing Controlled Parking Zone already in place.

10.12.16 In terms of impact on commuters who drive to the station the applicant has submitted supporting information and evidence in respect of the likely impacts of the removal of the proposed station car park. To understand the estimated outcome current use of the car parks was considered through parking surveys (2019). Surveys were taken on car occupancy and trip origin. The results are contained in the Transport Assessment (TA) submitted in support of the planning application

10.12.16 The results show almost all car park users have the potential to choose alternative sustainable routes to work. They also show less than half of the (46%) of car park users originate in Enfield. A more detailed breakdown is as follows (these add up to more than 100% as some users have multiple alternative options):

- 33% and 50% of users live within walking distance of tube or rail and would have the opportunity to switch travel mode. This is a long-term ongoing ambition of Enfield and is being supported with additional infrastructure through a range of initiatives, including Healthy Streets work, of which this development will be expected to contribute towards;
- 68% live within walking distance of a bus serving Arnos Grove and will still be able to access the station via bus or potentially cycle;
- 5% of trips originate outside the M25.

10.12.17 Officers have assessed the loss of the car parks will result in varying degrees of impact. Some of these impacts would be adverse. Officers have assessed that these impacts are, on balance, acceptable subject to appropriate mitigation, based on:

- **the benefits of the scheme:** these are set out and summarised at Section 1 of this report and assessed in detail throughout. Officers consider that these outweigh the impacts on the proportion of private car users who would lose access to the two existing car parks;
- **Housing, and affordable housing priorities balanced against parking:** Housing, including affordable housing need is an Enfield and London-wide issue. Parking availability does not impact all Enfield households. Census data shows that 33% of households in Enfield have no access to a car or van – meaning their existing travel behaviours are already likely to be sustainable as that they tend to use public transport, walk or cycle.
- **Policy priorities and weight:** Enfield adopted policies are clear in emphasising the priority placed on delivering high-quality housing, including affordable housing. The same policy weight and protection does not exist in respect of parking. Adopted London Plan and emerging London Plan (ItP) policies give weight to the use of underutilised sites, such as car parks, for new housing.
- **Enfield's current corporate and statutory commitments towards the Mayor of London's Transport Strategy targets:** Encouraging sustainable travel options supports Enfield in achieving the Mayor of London's target to increase active and sustainable modes across London to 80%. Enfield receives annual funding from Transport for London to deliver the Mayor's Transport Strategy outcomes within Enfield through a funding and programme process known as a Local Implementation Plan. The LIP is a statutory document arising from the GLA Act 1999. Each borough's LIP covers proposals to implement the Transport Strategy of the Mayor of London (MTS), locally within the area of each borough.
- **The Climate Emergency and Enfield's Climate Action Plan 2020:** Enfield Council's Cabinet declared a state of climate emergency in July 2019. Emissions from transport in Enfield account for an estimated 39% of the borough's total emissions. Shifting movement to low carbon transport,

prioritising walking and cycling, will achieve the Mayor of London's target to increase active and sustainable mode share across London to 80%. It is also an important part of delivering the UK's commitment to have net zero emissions by 2050.

- 10.12.18 It is concluded that whilst the loss of station parking will have some impact on residents, and a minority from outside of the M25, the submitted surveys suggest that most users have the potential to use alternative transport modes to either get to the station, or to alternative stations. Given any impact is a direct consequence of the development, a suitable Section 106 package towards local improvements should be secured to support the modal shift. Officers have recommended that a suitable s106 package be secured. Officers have also secured mechanisms with the Section 106 legal agreement to monitor this and if necessary, seek mitigation from the developers in order to address any unanticipated impact.

The impact of the loss of parking on local residential streets

- 10.12.19 Objections have been received that the loss of parking would result in commuters seeking car parking spaces in the roads immediately adjacent to the existing CPZ boundaries. If they chose this option, then residents in those areas where this additional parking occurs are likely to campaign for extensions of the CPZ.
- 10.12.20 It can be assumed that the development will lead to an increase in pedestrian / bus/ cycle trips to the station. Further, it is more likely that trips will fall, with some commuters using alternative routes to work as it becomes too inconvenient to park close to the site due to the existing CPZ. There is therefore a level of confidence in assuming commuters will not park and walk through the existing CPZ based on the travel distances involved. The Controlled Parking Zone already would mean walking distances that are unlikely to be desirable – and would be less preferable to alternative options. It should be noted that whilst 500m is the “desirable” distance to walk from outside a CPZ to a place of interest (Providing for Journeys on Foot, Institute of Highways and Transport, 2000), the actual distance on foot to walk from the 500m radius from the site is likely to be above 500m due to the indirect routes.
- 10.12.21 In addition, there is a lack of parking outside of the CPZ and many roads have footway crossovers, and parking is limited. There are also barriers such as the A406, making navigation difficult. Officers consider the existing combination of wider site characteristics mean displaced parking is unlikely.
- 10.12.22 Nevertheless, survey measures will be secured enable the Council to monitor the situation. These surveys will include data showing the baseline level of parking currently taking place outside of the CPZ; these results can then be compared with further surveys undertaken once the car park is lost. Officers have secured mechanisms with the Section 106 legal agreement to monitor this and if necessary, seek mitigation from the developers in order to address any unanticipated impact. These mechanisms include reviewing and monitoring car parking in the local area to identify if the development is resulting in car parking displacement to neighbouring streets. Should this be found to be the case, a financial contribution will be sought from the developers to facilitate corrective action, including changes to the existing Controlled Parking Zone.

Car-free residential scheme

- 10.12.23 The site is situated directly adjacent to a tube station and bus interchange – providing a very robust case for a car-free development. This is a unique site, where the walking distances involved in accessing a tube station would be equivalent to accessing any resident car parking, were it proposed within the scheme. The site is also located within/adjoining a local centre, with existing amenities – which would provide convenience retail directly adjoining the site.
- 10.12.24 The proposed car-free aspect of the residential development is considered acceptable, given the location of the site, directly adjacent a tube station and bus interchange with bus routes serving a wide catchment area and the site's location in an existing CPZ area and near shops.
- 10.12.25 A restriction of parking permits will also be secured in the Section 106 legal agreement meaning that future occupiers of the development would not be issued parking permits for parking within the existing Controlled Parking Zone. The developers have confirmed that this would be further reinforced through tenancy contracts.
- 10.12.26 On site provision will be made for Blue Badge residents car parking and to replace the existing provision. The eleven disabled parking bays all meet the minimum dimensions and can be accessed and egressed in a forward gear. Electric car charging points will also be available within the blue badge holder spaces.
- 10.12.27 Officers are therefore confident robust package of disincentives and incentives would be in place / secured through s106 to ensure car-free approach is supportable. The disincentives for residents to own a car or choose car travel include: the existing CPZ (distance required to park outside); s106 obligations with potential to secure potential CPZ extension; restrictions on parking permits. Incentives to choose sustainable options include the sustainable location of the proposals (adjoining station and interchange with very good services); the site's location near shops (facilities); and the s106 package negotiated to incentivise residents to use sustainable travel options.

Existing pedestrian and cyclist safety

- 10.12.27 Representations have been received raising concerns about security, including concerns from those who currently drive and park near the station – because they may feel vulnerable walking on the streets rather than driving to the station. One of the aims of the Mayor of London (Mayor's Transport Strategy) approach, reducing car-reliance and encouraging non-car travel, is to promote feelings of safety and security increasing activity, including pedestrian footfall.
- 10.12.28 The proposal will introduce a permanent population to the site, with increased footfall between the proposal and surrounding areas.

Existing highway safety

- 10.12.29 Representations have been received raising concerns in respect of road accidents within the vicinity of the site, including requests for traffic calming along Bowles Road to reduce road accidents.
- 10.12.30 The Applicant has submitted a review of the Transport for London collision data for the area within their submitted Transport Assessment (for the five-year period available up to 31 December 2018). The details show that out of 65 collisions within the study area, that 64 of these collisions are considered resultant of driver error – 27 accident being due to drivers failing to look properly, 19 accidents being due to drivers being careless / reckless / in a hurry. One collision was identified as being potentially influenced by the highway layout. This collision was not within the site frontage, occurring on Oakleigh Road South junction with Friern Barnet Road.
- 10.12.31 The Mayor of London's Vision Zero Action Plan focuses upon reducing road danger, including deaths and injuries, on London's roads and streets. This aims to make London a safer and healthier place that promotes Active Travel. The site is currently a car park with high vehicle flows in, out and within the area, and therefore people walking may feel unsafe and worry they could be involved in a collision with a motor vehicle.
- 10.12.32 The Applicant undertook a car park survey in 2019 which indicated that 834 two-way vehicle movements occurred on an average weekday, with a corresponding peak utilisation of 75%. Removing the car parks at Arnos Grove would result in a reduction of approximately 725 journeys within this vicinity.
- 10.12.33 A user survey was undertaken at Arnos Grove car park and this showed that 68% of the car park users lived with walking distance of a bus route that serves Arnos Grove Station. Therefore potentially 68% of the 834 two-way daily movements could have been undertaken by bus, which equates to 567 daily bus trips.

Active Travel Zones and Healthy Streets

- 10.12.34 A Healthy Streets Design Check is a requirement of the London Plan (Intend to Publish) Policy T2. This requires developments to reduce the dominance of vehicles and deliver improvements that support the ten Healthy Streets Indicators.
- 10.12.35 The submission documents confirm that a Healthy Streets Design Check has been undertaken as required by London Plan and found that the Proposed Development result in a 24% increase in the Healthy Streets score from an average of 53% to 77%. Key improvements result from the provision of a new public square including benches and green space, providing opportunities for social integration and recreation and improvements to the streetscape. Indicators with the highest improvement score include shade and shelter, and places to rest.

Vehicular Access

- 10.12.36 Access is provided from two revised access points: one on the east and one on the west. The access points have regard for visibility splays from the 'Manual for Streets' standards which require a 43m visibility splay either side

of the access, from 2.40m behind the access. These are shown on the plan AG-102384-T-102 of the submitted drawings. These access points are considered acceptable in principle.

Servicing and Delivery

10.12.37 The submission documents include a Delivery and Service Plan (DSP) which contains relevant detail in relation to how the site will be serviced via service roads for refuse & deliveries etc. Both sides of the Site will be serviced by the access roads running through the Proposed Development. The DSP shows the tracking diagrams for deliveries from a transit van, which can enter the site from Bowes Road and turn and exit in a forward gear. The tracking also includes a fire tender, which is the largest vehicle likely to require access, and therefore confirms that future large refuse vehicles can also access and egress the site.

10.12.38 As the site is car free, deliveries are likely to be required more frequently than for sites where parking is provided. The Transport Assessment includes delivery estimates based on a similar type of development in the applicant's portfolio elsewhere. The delivery estimates are as follows:

Table 6: Delivery trip estimates

Trip Generation			
Time Period	In	Out	Total
08:00 – 09:00	1	2	3
17:00 – 18:00	2	2	4
Daily	11	12	23

10.12.39 Based on these figure deliveries are not expected to be significantly high, and it is noted that the site makes an allowance for delivery vehicles to access and turn within the site. This consideration is welcomed as the site is based on a busy classified road and forcing delivery vehicles to park on the highway would not be acceptable.

10.12.40 Whilst the figures are noted as being quite low in absolute terms, it is considered the layout of the site could accommodate occasional increases in the number of predicted deliveries if required.

10.12.41 The front of the site outside the station will remain functioning as a bus interchange. There are some alterations proposed, which have been reviewed and agreed by TFL and satisfies the Council's Traffic & Transportation team. It is noted the changes are to relocate the bus stop and taxi bays, and to shorten the length of the existing stopping area to facilitate more public space.

10.12.42 Some level of concern is noted in relation to vehicles still attempting to park at the station for drop offs. Whilst this will need to be controlled within the bus interchange by enforcement measures, there may be a wider impact of vehicles dropping off elsewhere but close to the station. This impact will be monitored post implementation and this monitoring will be secured within the Section 106 legal agreement.

Car Club

- 10.12.43 Other measures that will be secured by the Council through the Section 106 legal agreement will be a financial contribution towards the provision of a car club to provide access to shared mobility options. The provision would be dealt with through a fund provided by the applicants and comprise a fund of up to £15k being made available by the applicant to fund car club membership fees for residents during the first 3 years following first occupation.

Cycle Parking Provision

- 10.12.44 The Development will provide 288 residents cycle parking spaces and 22 station and visitor cycle parking spaces within the Site in locations which are secure and accessible.
- 10.12.45 The station already has a provision for 22 spaces, and the submission documents note that recently a further 16 spaces have recently been provided in a cycle hub outside the site. As part of the station development, a commercial unit will be provided. It is expected that some linked trips may exist between the station and the commercial unit, however London Plan requirement is 6 spaces (short stay) and 1 space (long stay) for the retail, and 3 spaces (short stay), and 1 space (long stay). In total, there will be 46 stands (2 spaces per stand) provided in the new square close to the station.
- 10.12.46 The Transport Assessment states that when broken down, this leaves 6 spaces for the commercial unit, and 40 spaces for the station (Paragraphs 3.30, 3.31). This is acceptable in principle however it is noted that the long stay cycle storage is for staff, and as such will be subject to a planning condition requiring further detail including detail of how the spaces will be secure and reserved for staff.

Summary of Transport Considerations

- 10.12.47 The application proposes to replace the existing car parks on Sites A and B with a good quality car-free residential development in a highly sustainable location. The proposed car-free development on a Brownfield site in a highly sustainable location aligns with the aspirations of adopted and emerging planning policy, as well as to the Borough's commitment to becoming a carbon neutral borough by 2040.
- 10.12.48 The removal of car parking, and provision of infrastructure on site to support sustainable travel modes, such as walking, cycling and electric car charging will encourage a positive change to patterns of travel behaviour towards low and zero carbon modes, in line with current and emerging policy requirements.
- 10.12.49 In light of the above assessment it is considered that whilst there would be some level of impact during a transition from the existing car dominant situation towards a proposed more sustainable situation, this impact is not sufficient to render the proposal unacceptable.
- 10.12.50 Officers have scrutinised the submission documents and are satisfied that the proposed development is acceptable in terms of its impact on the local transport network, meeting policy requirements including Enfield DMD 45 and Core Policies 24, 25 and 26; current London Plan Policy 6.1; and emerging

London Plan Policies (Intend to Publish) T2, T6 & T9 and, where necessary, providing appropriate mitigations. As also mentioned above the Section 106 agreement will include clauses for surveys to ensure any post-construction impacts are reviewed and mitigated where necessary. The development does not raise any issues which would be significantly prejudicial to highway safety or the free flow of traffic on the public highway and according to trip rate forecasts, will have a positive impact on the number of vehicle trips. The detailed Section 106 requirements are listed towards the end of this report.

8.11 Trees and Metropolitan Open Land

- 8.11.1 Policy G7 of the London Plan (Intend to Publish) requires existing trees of value to be retained, and any removal to be compensated by adequate replacement, based on the existing value of benefits. The Policy further sets out that planting of new trees, especially those with large canopies, should be included within development proposals.
- 8.11.2 Meanwhile Enfield Policy DMD80 stipulates that developments do not result in any loss or harm to trees of significant biodiversity or amenity value, or adequate replacement must be provided whilst the Enfield Issues and Options Plan outlines the benefits that trees offer to people and the environment by improving air quality, reducing noise pollution, contributing to climate change adaptation and reducing the urban heat island effect.
- 8.11.3 The Proposed Development will involve the removal of 45 trees. Of these, none are Category A and two are Category B. As 73 new trees will be planted, the Development will result in a net gain of 28 trees, which will mean an overall increase in tree canopy cover on the site in comparison to the existing situation.
- 8.11.4 The submission documents state that proposed below ground utilities and drainage infrastructure have been designed to avoid Root Protection Areas (RPAs) in order to protect the integrity of retained trees. Detailed protection measures have been provided in the submitted Arboricultural Method Statement. A condition is recommended ensuring the methods outlined in the submitted documents are adhered to on site, to ensure trees will be appropriately protected at all stages of development.

Conclusion of Trees

- 8.11.5 On the basis of an Arboricultural Method Statement being submitted the Proposal is considered to be acceptable in relation to trees and in line with relevant policies including Enfield Policy DMD80 and Policy G7 of the London Plan (Intend to Publish). It is also noted that substantial amounts of landscaping is proposed as part of the development. As such there will be an improvement resulting from this and from the gain in trees in terms of visual amenity and biodiversity benefits.

Metropolitan Open Land

- 8.11.6 A small area of land in the northern most part of Site A includes dense trees and shrubs and forms part of Metropolitan Open Land (MOL). The London Plan affords MOL the same status and protection as Green Belt and in alignment with this approach, Enfield Policies do not permit inappropriate development in MOL.

- 8.11.7 The Proposed Development does not include the construction of any buildings within the MOL designation however, there will be improved access to the area of MOL via an informal footpath with incidental play opportunity for children aged 5+.
- 8.11.8 As Paragraph 141 of the NPPF requires LPAs to plan positively to enhance the beneficial use of Green Belt (such as looking for opportunities to provide access to and recreation within them), this is considered acceptable in this instance.

8.12 Water Resources, Flood Risk and Drainage

- 8.12.1 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 London Borough of Enfield 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.
- 8.12.2 London Plan (Intend to Publish) Policy SI 12 requires developments to ensure flood risk is minimised and mitigated and that residual risk is addressed. As the site is located within Flood Zone 1 the sequential test does not apply to the development.
- 8.12.3 The Proposed Development would result in a change of use to a 'More Vulnerable' use class (Flood Risk Table 2). This is considered acceptable in Flood Zone 1, without the requirement for the Exception Test to be passed, in accordance with Flood Risk Table 3 (vulnerability and flood zone 'compatibility') set out in the Planning Practice Guidance.
- 8.12.4 Meanwhile London Plan Policy 5.13 and London Plan (Intend to Publish) Policy SI13 relate to sustainable drainage whereby the preference is to reduce surface water discharge from the site to greenfield run off rates.
- 8.12.5 The Council's draft Local Plan sets out the Borough's ambitions in relation to growth until 2036. Policy SUS5: Surface Water Management notes the following overarching aims in relation to drainage and flood risk:
- All major developments to implement Sustainable Drainage Systems (SuDS) to enable a reduction in peak run-off to greenfield run-off rates for the 1 in 1 year and the 1 in 100-year event (plus climate change allowance);
 - All major developments to provide a sustainable drainage strategy that demonstrates how SuDS will be integrated to reduce peak flow volumes and rates in line with the requirements of this draft policy approach;
 - All other developments to maximize attenuation levels and achieve greenfield runoff rates where possible or increase the site's impermeable area;
 - Development to be designed to minimise flood risk and include surface water drainage measures to be designed and implemented where possible to help deliver other Local Plan policies such as those on biodiversity, amenity and recreation, water efficiency and quality, and safe environments for pedestrian and cyclists;

- All new outdoor car parking areas and other hard standing surfaces be designed to be rainwater permeable with no run-off being directed into the sewer system, unless there are practical reasons for not doing so;
- Living roofs to be incorporated into new development, to help contribute to reducing surface water run-off; and
- Where installed, SuDS measures be retained and maintained for the lifetime of the development and details of their planned maintenance provided to the Council.

8.12.6 Supporting these principles is Development Management Document Policy DMD 61 which requires a drainage strategy to be produced that demonstrates the use of SuDS in line with the London Plan discharge hierarchy. The policy requires the use of SuDS to be maximised with consideration given to their suitability, achieving greenfield run off rates, the SuDS management train and to maximise the opportunity for improved water quality, biodiversity, local amenity and recreation value.

8.12.7 As well as the above policy the Council sets out further advice in its Flood Risk guidance which outline strategies for the mitigation of flood risk, management of surface water including the implementation of Sustainable Urban Drainage Systems (SuDS) on new developments, with allowances for the impact of climate change. The guidance recommends that the relevant documents are i) Preliminary Flood Risk Assessment, ii) Surface Water Management Plan, iii) Strategic Flood Risk Assessment (Levels 1 & 2), iv) Local Flood Risk Management Strategy, and v) Sustainable Drainage Design and Evaluation Guide.

8.12.8 Lastly the CIRIA C753 'The SuDS Manual' 2015 includes up-to-date research, industry practice and guidance in relation to delivering appropriate SuDS interventions including information on measures to deliver cost-effective multiple benefits relating to technical design, construction and maintenance of SuDS systems.

Assessment

8.12.9 The submission documents include a Flood Risk Assessment (produced by Aecom, dated March 2020) assessing all possible sources of flood risk in relation to London Plan Policy 5.12 and London Plan (Intend to Publish) Policy SI12. This assessment states that the site is at a low risk of flooding from all sources. A Surface Water Drainage Strategy and Foul Drainage Strategy have also been included within the accompanying Drainage Strategy.

8.12.10 Whilst it is noted that the applicants support surface water pumps as the preferred discharge option, the application submission does not currently provide sufficient information to demonstrate that a gravity sewer connection has been sufficiently explored. In addition, robust reasons for not discharging to a gravity sewer have not yet been provided to the satisfaction of the Council. As a gravity sewer connection is the most long-term sustainable solution, a planning condition is recommended requiring robust investigation into the potential for this to be explored and for details of this to be submitted to the Council.

8.12.11 In addition to the above the proposal will necessitate the removal of a large proportion of the existing car park hardstanding, which will result in the

impermeable area within the Site decreasing. In order to try and offset this the development proposes to incorporate areas of green roof, soft landscaping and permeable paving which is welcomed.

- 8.12.12 The application includes a Landscape Strategy (revised September 2020) which details proposed Sustainable Drainage Systems (SuDS) interventions such as 50% green roofs, rain gardens, swales and permeable paving which is welcomed by Officers. A planning condition requiring further investigation into SuDS measures including the feasibility of a gravity sewer connection and the feasibility of rainwater harvesting on site, is recommended.

Summary of Water Resources, Flood Risk and Drainage

- 8.12.13 Notwithstanding the above, and subject to planning condition/s pertaining to the submission of a Sustainable Drainage Strategy to include details of the sustainable management of waste; minimisation of flood risk; minimisation of discharge of surface water outside of the curtilage of the property; and to ensure that the drainage system will remain functional throughout the lifetime of the development, the proposal is considered to be in accordance with Policy CP28 of the Core Strategy, DMD Policy 61, and Policies 5.12 & 5.13 of the London Plan and the NPPF.

8.13 Environmental Considerations / Climate Change

- 8.13.1 The NPPF maintains the presumption in favour of sustainable development, including environmental sustainability, and requires planning to support the transition to a low carbon future in a changing climate (Para.148). This entails assisting in reducing greenhouse gas emissions, minimising vulnerability, encouraging the reuse of existing resources and supporting renewable and low carbon energy infrastructure.
- 8.13.2 Meanwhile London Plan (Intend to Publish) Policy G1 acknowledges the importance of London's network of green features in the built environment and advocates for them to be protected and enhanced. The Policy notes that green infrastructure 'should be planned, designed and managed in an integrated way to achieve multiple benefits'. Also of relevance is Policy G6 which requires developments to manage impacts on biodiversity and secure a net biodiversity gain.
- 8.13.3 Paragraph 150 of the NPPF requires new developments to 'be planned for in ways that avoid increased vulnerability to the range of impacts from climate change... and help to reduce greenhouse gas emissions, such as through its location, orientation and design'. The Council's Cabinet declared a state of climate emergency in July 2019 and committed to making the authority carbon neutral by 2030 or sooner. The key themes of the Sustainable Enfield Action Plan relate to energy, regeneration, economy, environment, waste and health. Meanwhile the London Plan (Intend to Publish) and Enfield Issues and Options Plan each make reference to the need for development to limit its impact on climate change, whilst adapting to the consequences of environmental changes. Furthermore, the London Plan sets out its intention to lead the way in tackling climate change by moving towards a zero-carbon city by 2050.

Energy and Sustainability

- 8.13.4 Currently, all residential schemes are required to achieve net zero carbon with at least an on-site 35% reduction in carbon emissions beyond Part L of 2013 Building Regulations. The same target will be applied to nondomestic developments when the new London Plan is adopted.
- 8.13.5 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.
- 8.13.6 Policy SI2 of the London Plan (Intend to Publish) 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). Meanwhile Policy DMD55 and paragraph 9.2.3 of the London Plan (Intend to Publish) advocates that all available roof space should be used for solar photovoltaics.

Assessment

- 8.13.7 An Energy Statement and a Sustainability Statement have been prepared by Aecom which provide an overview of the energy and sustainability strategies for the Proposed Development. The documents demonstrate how the proposal has sought to meet London Plan requirements and relevant Council policies.
- 8.13.8 In order to reduce the energy consumption of the development and to assist in achieving a compliant scheme, the Energy Statement states that measures pertaining to energy efficiency; overheating and cooling; decentralised energy; and renewable energy need to be incorporated into the detailed design.
- 8.13.9 The Proposed Development has sought to follow the London Plan (Regulated Carbon Emissions Reduction Priority) hierarchy. To that end passive efficiency measures have been introduced in the proposals through a high standard of fabric (including highly insulated walls, floor and roofs, efficient glazing and high levels of air tightness) and energy efficiency specified to reduce energy demand, CO2 emissions as well as reduce running costs for future occupiers.
- 8.13.10 The Carbon Emission Reduction Model demonstrates that target emission reduction from the baseline (Part L 2013) can be exceeded through the proposed energy efficiency measures and can achieve the 10% / 15% carbon reduction targets as required by London Plan (Intend to Publish) Policy SI2.
- 8.13.11 The applicants are currently liaising with Energetik with the intention of connecting to the District Energy Network (DEN). At the time of writing this report correspondence between the parties is ongoing and an agreement to connect to the DEN is being actively pursued. The Arnos Grove Heat Network is currently served by an energy centre that generates heat using Gas Combined Heat and Power and boilers. The network connection is proposed in accordance with the requirements of Policy S13 of the London Plan (Intend to Publish) and Council policy DMD52 which require major development to connect to existing heat networks unless there are feasibility or viability

reasons not to. The expected carbon emission reduction from connection to the DEN is 26% which is considered a substantial efficiency.

8.13.13 It is recommended that s106 planning obligations be secured in line with adopted Enfield DMD Policy 52 and the requirements of Enfield's adopted Decentralised Energy Network Technical Specification SPD. The Applicant is actively considering and pursuing connection to the planned Energetik District Heat Network (DHN). An alternative fall-back strategy, based on Air Source Heat Pumps (ASHP), is also being considered. A carbon off-set contribution is recommended to be secured by way of s106 of between £139,847 - £194,731.

8.13.14 The submitted Energy Strategy sets out that CO2 emission reduction would also be achieved through the installation of photovoltaic panels (PV) on 130 sq.m of roof area across the development. The submitted information details that 69% of the flat roof area across the Proposed Development will not be suitable for PV installation due to the need for setbacks, plant, machinery and other roof equipment, and shaded areas. Notwithstanding the combined energy efficiency measures are expected to achieve a reduction of 42% in regulated CO2 emissions which exceeds the minimum London Plan (Intend to Publish) target of 35% and meets Enfield policy requirements.

8.13.15 During the course of the application (pre and post-submission) the applicant has continued to work with the GLA's Energy Team to respond to GLA comments on the proposal in Energy terms. The proposal is considered acceptable in terms of energy and sustainability.

Ecology and Biodiversity

8.13.16 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. Meanwhile London Plan (Intend to Publish) Policy GG2 requires development to 'protect and enhance... designated nature conservation sites and local spaces and promote the creation of new infrastructure and urban greening, including aiming to secure net biodiversity gains where possible'. This guidance is also evident in London Plan (Intend to Publish) Policy G6 which requires developments to manage impacts on biodiversity and secure a net biodiversity gain. Enfield Core Policy 36 requires development to protect, enhance, restore or add to existing biodiversity including green spaces and corridors, whilst draft Local Plan policy GI4 refers to the need to promote qualitative enhancement of biodiversity sites and networks and encourage the greening of the Borough.

8.13.17 Within a more strategic context the Environment Bill, published by the UK Government in October 2019 includes proposals to make biodiversity net gain (BNG) a mandatory requirement within the planning system in England. Should the Environment Bill be passed in a form similar to that introduced in October 2019, developments such as this will be required to achieve a 10% gain in biodiversity units relative to the development site's baseline biodiversity.

8.13.18 The Site is adjacent to a Site of Borough Importance for Nature Conservation (SINC), within which sits a Wildlife Corridor along the Piccadilly Railway Line tracks. Currently the existing site is considered of low biodiversity and

ecological value, with the exception of vegetation to the periphery of the site, and an area of woodland to the north of Site A.

8.13.19 The Proposed Development will not result in the disturbance of any existing habitats. In addition, the scheme has been designed with the protection and enhancement of the habitat and biodiversity within and adjacent to the site, in mind. To that end planting has been selected to maximise biodiversity value and features native or near native species which will help to reinforce the established nature of the adjoining SINC.

8.13.20 When measured against Natural England's Biodiversity Metric 2.0 Calculator, it was found the proposed development would result in a 30.80% biodiversity net gain which exceeds requirements of the forthcoming Bill by some margin. Furthermore, this demonstrates compliance with the requirements of the NPPF (Para 170) and London Plan (Intend to Publish Policy G6) in relation to development delivering biodiversity net-gain.

Climate Change

8.13.21 Recent data from the Met Office indicates key climate projections for the UK are summers becoming hotter and drier; winters becoming milder and wetter; soils on average becoming drier; snowfall and the number of very cold days decreasing; rising sea levels; and storms, heavy and extreme rainfall, and extreme winds becoming more frequent.

8.13.22 As mentioned above Paragraph 150 of the NPPF requires new developments to 'be planned for in ways that avoid increased vulnerability to the range of impacts from climate change... and help to reduce greenhouse gas emissions, such as through its location, orientation and design'. Also as mentioned above, in July 2019 a state of climate emergency was declared by the Council's Cabinet which committed to making the authority carbon neutral by 2030 or sooner. The key themes of the Sustainable Enfield Action Plan focus on energy, regeneration, economy, environment, waste and health.

8.13.23 Meanwhile, the London Plan (Intend to Publish) and Enfield Issues and Options Plan both make reference to the need for development to limit its impact on climate change while adapting to the consequences of environmental changes. The London Plan's ambitions look to lead the way in robustly addressing climate change by moving towards a zero-carbon city by 2050.

Assessment

8.13.24 The Proposed Development incorporates a number of measures and philosophies which align with a larger and wider drive to address climate change. These include as follows:

- removing the opportunity for and subsequently reducing the reliance on private motor vehicles, and as such easing traffic and congestion; and
- demonstrating via a high score against 'Healthy Street' indicators that the Development would provide an overall improvement in the local environment – this will have the knock-on effect of encouraging and assisting Londoners to use cars less and walk, cycle and use public transport more.

8.13.25 The above measures would as a result reduce the use of cars or polluting

vehicles and emission of greenhouse gases (i.e. carbon dioxide, methane and nitrous oxides) which contribute to climate change.

8.13.26 In addition, by contributing to local green infrastructure through new planting, green roofs and a net gain in tree coverage which all support biodiversity and reduce the urban heat island effect. These green networks will connect to existing ecological corridors and open spaces, particularly along the Piccadilly Line railway tracks.

8.13.27 As well as these measures the layout of the Development includes passive design strategies to reduce energy consumption and proposes the use of efficient processes and appliances, energy efficient fabric, insulation and glazing, as well as efficient lights, hot water storage and mechanical ventilation with heat recovery. A connection to the District Energy Network and the addition of 130 sq.m of PV roof panels will further reduce energy consumption and raise the eco credentials of the Development and wider Site.

Conclusion of Environmental Considerations

8.13.28 The Proposed Development is considered to meet national, London and local policy requirements which seek to ensure developments protect and enhance the natural environment. As well as the measures outlined above, as noted elsewhere in this report the development will be car free which would mark a significant milestone towards addressing climate change by removing the opportunity for and subsequently reducing the reliance on private motor vehicles.

8.13.29 The proposal supports London and local action plans to mitigate climate change, minimising its impacts and ensuring development is resilient to its effects. It employs strategies such as promoting sustainable travel, removing cars from the road, proposing efficient systems and energy consumption reduction measures as well as enhancing and expanding the green infrastructure network.

8.13.30 Whilst the Development seeks to account for the likely future extreme weather events such as higher temperatures and more rainfall, the Council are seeking further measures in the way of drainage and SuDS intervention as outlined earlier in the report. With the above taken into consideration, the proposal is considered to be acceptable in terms of environmental considerations and in line with relevant policies including DMD51, 52, 53, 54, 56, 78, 79; CS Policies 20, 32 & 36; existing London Plan Policies 5.1, 5.2, 5.5, 5.6, 5.7, 5.9, 5.10, 5.11, 5.12 & 5.13; and London Plan (Intend to Publish) Policies G6 & S12.

8.14 Waste Storage

8.14.1 The NPPF refers to the importance of waste management and resource efficiency as an environmental objective. Policy SI7 of the London Plan (Intend to Publish) encourages waste minimisation and waste prevention through the reuse of materials and using fewer resources whilst noting that applications referable to the Mayor should seek to promote circular economy outcomes and aim to achieve net zero-waste.

8.14.2 Meanwhile Enfield Core Policy 22 (Delivering Sustainable Waste

Management) sets out that in all new developments, the Local Planning Authority will seek to encourage the inclusion of re-used and recycled materials and encourage on-site re-use and recycling of construction, demolition and excavation waste.

Construction Waste

- 8.14.3 The Proposed Development will not involve the demolition of any buildings and generated construction waste will amount to the surfacing of the car park and other minor detritus. The submission documents state that waste management during construction will be in line with the waste hierarchy in order to minimise do far as possible, the amount of waste being sent to landfill or similar disposal routes.

Operational Waste

- 8.14.4 Paragraph 5.2.7 of the submitted Design and Access Statement outlines proposed refuse and recycling arrangements for the development as follows:

Residential:

- Bin stores have been designed as secure rooms located at ground floor, with external street access and have been located close to residential entrances or set deep into the plan;
- Block A02 and B02 have lobbied pedestrian entrances for refuse drop off. Bins are taken out via a separate louvred door, orientated away from residential entrances; and
- Collection will take place from within the development with refuse vehicle turning heads located to the south of A02 and B02. All collection points are within 10m of bin stores.

Commercial Unit:

- A small refuse and recycling store facility is located to the east of A01 and will be served via kerb side commercial collection with future tenants of the commercial unit overseeing their own collection arrangements.

LUL Bins:

- Arnos Grove station is the terminus for some trains. Six no. Euro bins are currently located on site B and are required to be reprovided. Bins are located to the western side of B01 and accessed via a service entrance from the public realm to the south.

- 8.14.5 In order to ensure that operational waste requirements, including access arrangements for waste vehicles and base calculations of bin numbers for waste storage and dedicated recycling bins required for the dwellings are met, a planning condition requiring a Waste Strategy to be submitted to the Council for approval is recommended.

Conclusion

- 8.14.6 On the basis that the Development will seek to minimise waste generation as much as is feasible during both the construction and operational phase and use sustainable construction and waste disposal methods as much as possible in accordance with the Development Plan, it is considered that no significant adverse effects in respect to waste management would arise as a

result of the Proposal, and the Proposal would be in line with relevant Policies including DMD 49 & 57; CS 22; existing London Plan Policy 5.18; and London Plan (Intend to Publish) Policy S17. This is also subject to a planning condition requiring a Waste Strategy which should include details of the frequency of collections, to be agreed by the LPA prior to the development becoming operational.

8.15 Contaminated Land

- 8.15.1 The current carpark setting matches the latest map of the area with approximately 90% of the Site covered with asphalt, with the remaining 10% occupied by grass and mature trees. The submitted Contamination Report identifies no significant potential sources of contamination.
- 8.15.2 The Site remained undeveloped until 1932 when Arnos Grove Station was built. Historical OS map from 1936 identifies the construction of Arnos Grove Station and railway lines passing between the two parts of the Site (i.e. today western and eastern carparks). The carpark development is shown in 1950-1951 with it occupying the present territory from 1971.
- 8.15.3 The geology of the area just outside the north site comprises River Terrace Deposits overlying London Clay Formation. Lambeth Group, Thanet Sands and White Chalk are expected to be present below London Clay and there is also likely to be Made Ground. The nearest watercourse is Pymme's Brook river situated 220 m from the site.
- 8.15.4 The site is directly underlain by a significant thickness of low permeability London Clay (construction is expected to terminate within this stratum) which is classified by the Environment Agency as Unproductive Strata. Given the absence of a classified aquifer directly beneath the site, groundwater is considered to be a low sensitivity receptor. Mapping produced by the EA and supplied with the Envirocheck report shows that the site does not lie within a Source Protection Zone and therefore the risk to groundwater as a resource from potential contaminating activities is reduced.

Conclusion of Contaminated Land

- 8.15.5 Subject to appropriate condition/s being attached requiring both compliance with submitted proposed measures and further details to be submitted in the way of a Remediation Strategy and a Verification Report, the Development is considered acceptable in terms of contaminated land and in line with relevant guidance including Paragraph 170 of the NPPF.

8.16 Air Quality / Pollution

- 8.16.1 London Plan Policies 3.2, 5.3 and 7.14 and London Plan Policy (Intend to Publish) S11 set out requirements relating to improving air quality. These Policies require Development Proposals to be at least Air Quality Neutral and use design solutions to prevent or minimise increased exposure to existing air pollution. Furthermore, the Policies require developments to consider how they will reduce the detrimental impact to air quality during construction and seek to reduce emissions from the demolition and construction of buildings.
- 8.16.2 Meanwhile the NPPF (Para.103) recognises that development proposals which directly address transport issues and promote sustainable means of

travel can have a direct positive benefit on air quality and public health by reducing congestion and emissions.

- 8.16.3 Lastly Enfield Policy DMD 65 requires development to have no adverse impact on air quality and states an ambition that improvements should be sought, where possible.
- 8.16.4 Given the reduction in car traffic, proposed Energy Strategy and inclusion of electric car charging points the Proposed Development is considered unlikely to result in a negative environmental impact, including in terms of air quality and/or noise (Noise is also discussed elsewhere in this report).
- 8.16.5 The submission documents include an Air Quality Assessment considering the construction phase of the Proposed Development. The results of the assessment show that the modelled pollutant concentrations at all proposed receptors are below all relevant UK National Air Quality Strategy objective values and therefore the assessment concludes that the Site is considered suitable for the intended use.
- 8.16.6 The assessment further states that there are also no off-site impacts and therefore no contravention of planning policy. The assessment found there to be a medium to high risk of dust impacts during demolition and construction. Suitable mitigation measures have been recommended in this report to be included in a Construction Method Statement.
- 8.16.7 On the basis of the above and subject to recommended planning condition/s as outlined, the Proposed Development is considered to align with relevant Policy including Enfield Policy DMD 65; London Plan Policies 3.2, 5.3 and 7.14; and London Plan Policy (Intend to Publish) SI1, and as such is considered acceptable in terms of Air Quality/Pollution.

8.17 Socio-economics and Health

- 8.17.1 Based on the 2011 Census, the ward population for Southgate Green within the London Borough of Enfield Authority, was recorded as 13,787 with the number of households 5,154. Within that ward population the economically active (age 16-64 in full time work, part time work, self-employed, full time students or unemployed) is 73.4%, which is slightly lower than the England and Wales average of 76.8%.
- 8.17.2 The Proposed Development will result in the provision of housing, additional local spending by residents of the new development, and the provision of public and private amenity space and open space.
- 8.17.3 As the Development will provide good quality housing, a small level of employment opportunities by way of the round floor commercial unit in building A01 and access to amenity areas, potential positive effects on health are anticipated in regard to access to open space, crime reduction and community safety. Taking the above into consideration, overall it is considered that some positive environmental effects on socio-economics would arise as a result of the development. Furthermore, it is not considered there would be any significant effects on health occurring as a result of the development.

8.18 Education

- 8.18.1 Policy S3 of the London Plan (Intend to Publish) seeks to ensure there is a sufficient supply of good quality education and childcare facilities to meet demand and notes that needs should be assessed locally and sub-regionally.
- 8.18.2 Meanwhile Enfield Local Plan Core Policy 8 sets out that the Council will contribute to improving the health, lives and prospects of children and young people by supporting and encouraging provision of appropriate public and private sector pre-school, school and community learning facilities to meet projected demand across the Borough.
- 8.18.3 The Council's Section 106 Supplementary Planning Document (SPD) sets out that LBE will seek financial contributions for education at a rate of £2,535 per dwelling regardless of unit size. However, in the context of education contributions, the amount of mitigation requested should not exceed the cost of meeting the likely education demand from the development; and should be necessary to do so. If there is existing surplus capacity in education facilities that could meet this need without additional capital costs being required, education obligations are not justified in terms of tests set by Regulation 122.

Child yield

- 8.18.4 The total population and number of children expected to live in the Proposed Development has been calculated using the GLA Population Yield Calculator (v3.2 October 2019). For the purposes of the application the applicants have manually adjusted the age brackets to align with primary and secondary educational years.
- 8.18.5 For the Proposed Development a PTAL rating of 5-6 is assumed (the Site is located within PTAL 6a) and classified as 'London' (normally this location would be considered to be 'Outer London' however due to the small sample size of outer London developments that are in PTAL 5-6, this option is excluded from the model).
- 8.18.6 The projected gross child yield is set out in the Table below.
Table 7: Projected child yield arising from the Development

	Projected number of people
Total population yield	305
Total child yield (up to 16 years)	26
Children under 4	14
Children of primary school age (age 4-10)	9
Children of Secondary school age (age 11-15)	2
Children of sixth form age (16-17)	1

* Figures do not sum due to rounding.

- 8.18.7 The submitted information indicates the Development Child Yield will be 9 primary school age children, 2 secondary school age children, and 4 further/sixth form age children.
- 8.18.8 Using the GLA Population Yield Calculator (with the applicant adjustments as mentioned above), the estimated population number generated by the Proposed Development is 305. Of this number, it is expected that there will be 26 children under 16 years of age made up of nine children of primary school

age (4-10), two children of secondary school age (11-15) and 14 children under the age 4 of which a proportion may need local childcare.

- 8.18.9 It is noted that these projections are gross population yields and that some families may already live in the area and may already have a place at a local school. Additionally, not all children under 4 would be expected to need a place in an early years setting, and it would also be expected that most children who do, will take a part-time place. Based on the assumption that of those places that are part time, only part of the week or part of each day which will be utilised, it is assumed that one physical place in an early years setting can provide a part time place for more than one child.

Primary School

- 8.18.10 Officers have undertaken a detailed assessment of the potential child population, primary and secondary school surplus, latest forecasting information on school places in the context of Regulation 122 (Community Infrastructure Levy Regulations) tests. Regulation 122 sets out limitations on the use of planning obligations with which the planning authority must comply. It states: (1) This regulation applies where a relevant determination is made which results in planning permission being granted for development; (2) A planning obligation may only constitute a reason for granting planning permission for the development if the obligation is: necessary to make the development acceptable in planning terms; directly related to the development; and fairly and reasonably related in scale and kind to the development.

- 8.18.11 The scheme is estimated to house an estimated 9 primary school age children. There is evidence, in respect of this specific site and the appropriate catchment, of sufficient primary places (the current combined surplus capacity at the primary schools within 1km of the Site is approximately 10%). Whilst it is standard practice to maintain a surplus capacity of 5% in schools to accommodate mid-year admissions and facilitate parental choice, an estimated 10% surplus indicates that there is likely to be capacity within local primary schools

- 8.18.12 In the context of education contributions, this means that the amount of mitigation requested should not exceed the cost of meeting the likely education demand from the development; and should be necessary to do so. If there is existing surplus capacity in education facilities that could meet this need without additional capital costs being required, this means that education obligations would not be justified under the terms of Regulation 122.

- 8.18.13 The Infrastructure Planning team has confirmed that the evidence presented, including the modest child population likely, that it would not be proportionate, reasonable or necessary to request an education contribution in this specific case, on this specific site.

Secondary School

- 8.18.14 With regards to secondary school places it is noted that when recent secondary school projections were published there was some level of uncertainty about the opening time of the Wren Academy at Chase Farm. However, as the school is now open, it there is no further deficit in school

places, as evidenced and assessed at this time. As such, it is expected that any secondary demand will be met by this school and the opening of the One Degree Academy (Secondary part) which is currently planned for September 2023.

- 8.18.15 On the basis of the above information, and in the context of Regulation 122 the proposal is considered to align with relevant policy guidance including Enfield Local Plan Core Policy 8; and Policy S3 of the London Plan (ItP) and would not be considered give rise to an unmanageable or unacceptable scenario in terms of education provision to existing or future residents.

8.19 Fire Safety

- 8.19.1 In terms of fire safety, London Plan Policy D12 (Intend to Publish) requires developments to be designed to incorporate appropriate features to reduce the risk to life and Policy D5 requires proposals to ensure safe and dignified emergency evacuation for all building users. A fire statement produced by a third party suitably qualified assessor, has been submitted as part of the application which satisfies London Plan Policy D12 (Intend to Publish). London Fire Service have confirmed that details provided in relation to Fire Brigade Access and the Council's Building Control Team are also satisfied with the proposals. Notwithstanding a condition is recommended
- 8.19.2 The applicant has stated that it is not possible to provide fire evacuation lifts within each building core because there is no on-site management and that it is safer for a disabled person to wait in the stair core. However, in residential developments where evacuation lifts are present the fire and rescue service will have safe provisions to facilitate a co-ordinated evacuation in line with the building's evacuation strategy and as such on-site management is not necessarily required. As such, a condition is recommended requiring a fire evacuation lift to be provided within each building core for the evacuation of wheelchair users and other less mobile occupants in line with the Policy D5 of the London Plan (Intend to Publish).

9.0 Equality Statement

- 9.1 London Plan Policy 3.1 and 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. 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.

10.0 Community Infrastructure Levy

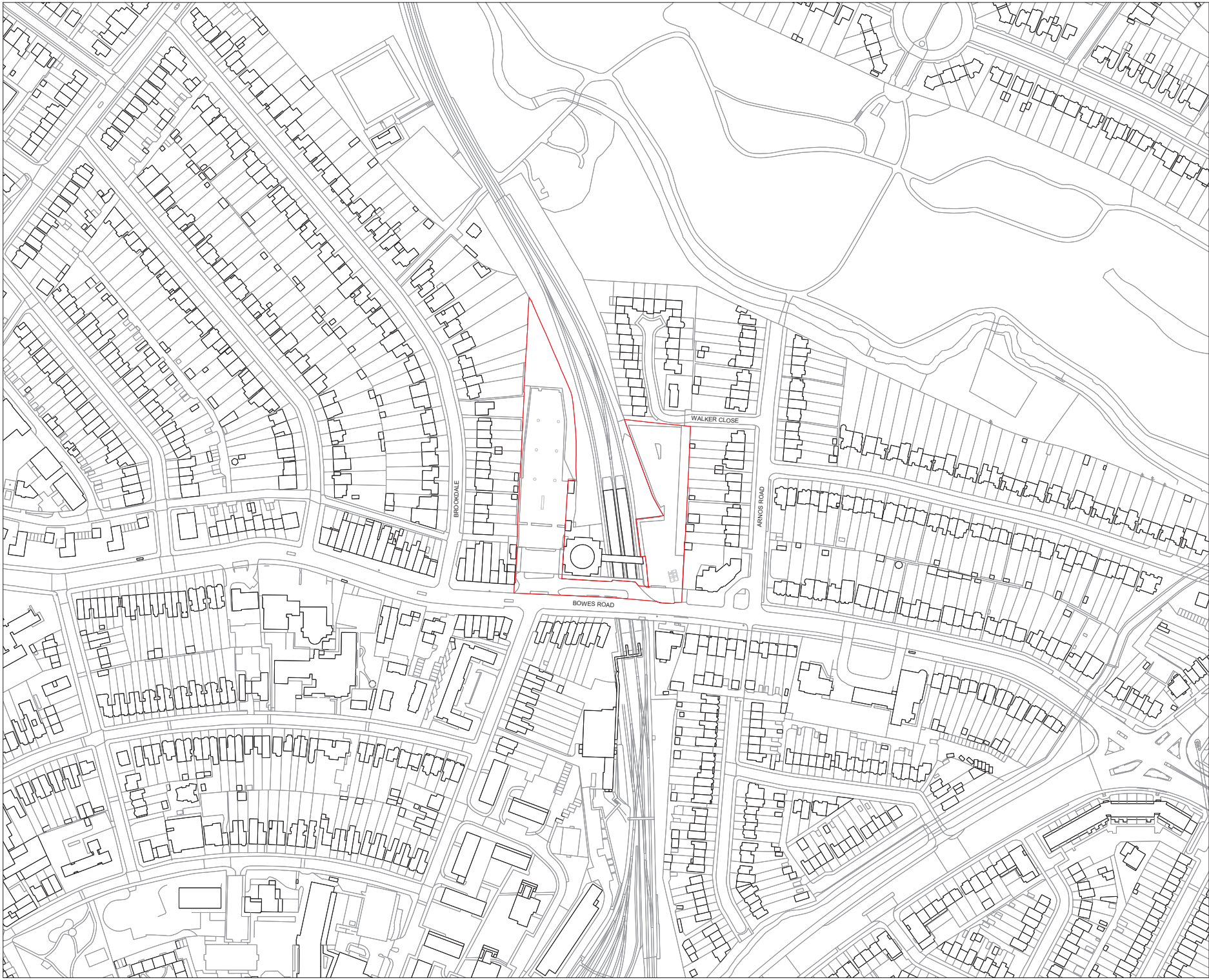
- 10.1** Both Enfield CIL and the Mayor of London CIL² would be payable on this scheme to support the development of appropriate infrastructure. A formal determination of the CIL liability would be made when a Liability Notice is issued should this application be approved. Based on the Mayor and Council's Charging Schedules, the total level of CIL is expected to be in the order of £1,765,181 (based on current details, certain scheme assumptions, indexation assumptions and inclusion of relief).

11. Conclusion

- 11.1** The proposed redevelopment of the car parks at Arnos Grove Underground Station has been developed in the context of the relevant local, London and national planning policy. The proposed Site is a brownfield site in a highly sustainable location at Arnos Grove Underground Station. As a previously developed site which is currently underutilised, the Proposed Development for housing is fully supported by policies for boosting the supply of homes (NPPF para 59, London Plan Intend to Adopt Policy GG2 and H1).
- 11.2** The Site has a PTAL rating of 4 (good) to 6a (excellent), being at Arnos Grove underground station which provides access to the Piccadilly Line, linking the site to most areas within the City and with a bus interchange at the front of the station. The well-connected Site aligns with Mayoral and emerging local ambitions of moving towards providing exemplary designed high density residential led developments in sustainable locations.
- 11.3** The delivery of 162 new homes will optimise the use of a sustainably located brownfield site and make an important contribution towards meeting both the Council's and the Mayor's annualised housing targets. The provision of 40% affordable housing (by habitable room) will meaningfully contribute towards local and strategic housing need and targets.
- 11.4** The Proposed Development is a design-led scheme which optimises development on the site, has been informed by the site's constraints and local character, and designed to respond positively to and minimise and mitigate impact on the Grade II* listed Underground Station. Whilst there is some level of impact resulting from the Development this is not considered sufficient to outweigh the public benefits of the scheme. The car free development, and provision of a new public square, will vastly improve permeability throughout the site, in stark contrast to the existing situation. It will also result in a shift away from the private car and encourage active travel and the use of public transport in line with the Mayor's Transport Strategy for Healthy Streets. The proposed buildings and public realm will have a positive impact on the immediate locality and introduce a contemporary style of architecture to the area that also responds positively to and complements the existing vernacular.
- 11.5** Optimisation of development on the site has also considered the requirements for residential space standards, private external amenity, play space and creating mixed and inclusive communities through the provision of wheelchair accessible and adaptable units, public transport accessibility and

movement, impact on residential amenity, townscape and character and the adequacy of existing social infrastructure.

- 11.6 As a result of the above characteristics 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 NPPF and the London Plan (Intend to Publish) to which, for reasons explained elsewhere in this report, significant weight has been attached. On the basis of the above, it is considered therefore, the Proposed Development aligns with relevant local, regional and national policy and as such is recommended for approval.



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031.3 M62.5 M

A02B02

A01B01

— Site Boundary

0Planning SubmissionRev DetailsRPJCW MAR 2020Drwn Chkd Date

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e uk@ml-architects.com

Client
CLL

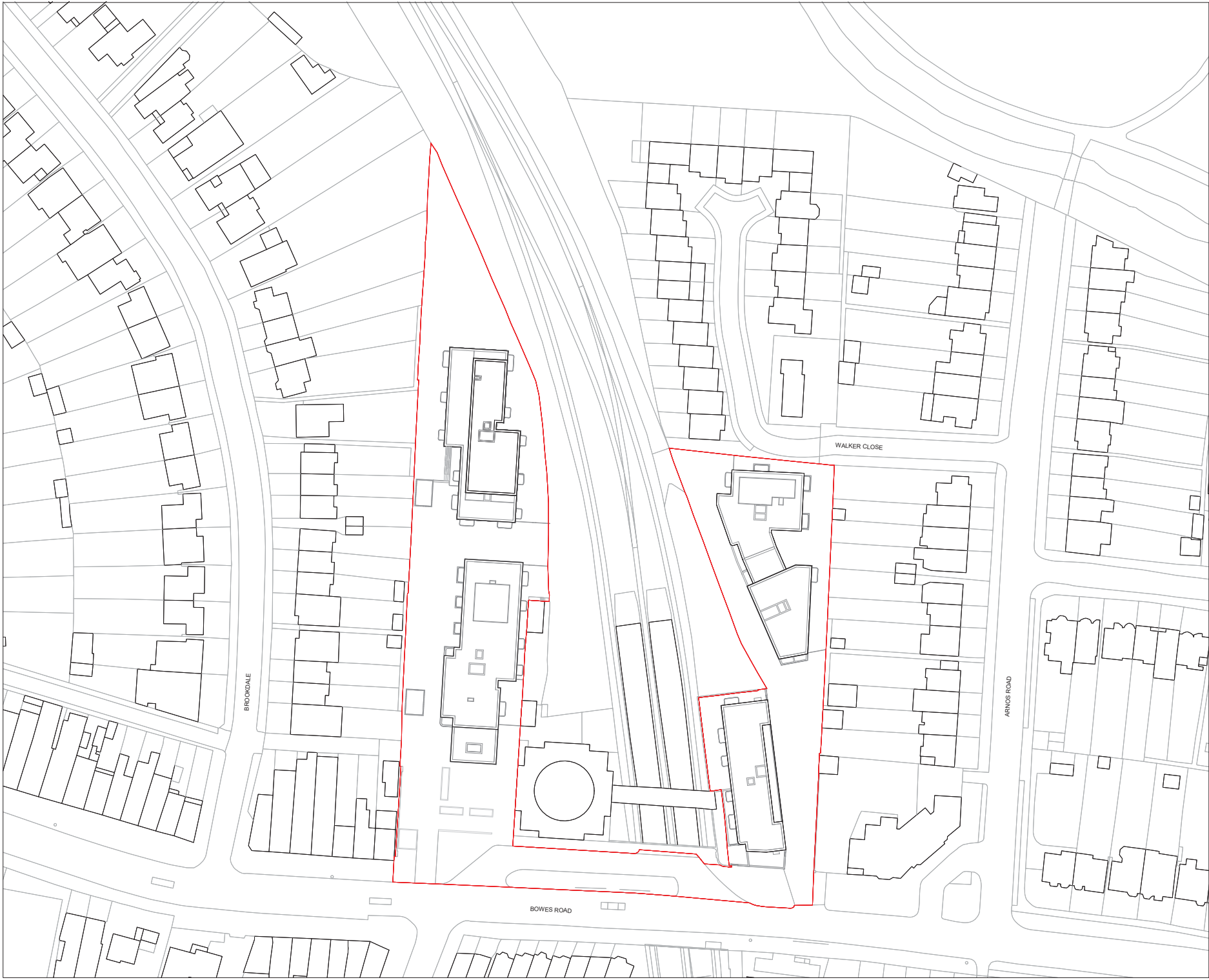
Project
Arnos Grove

Title
Location Plan

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MLUK-721-A-P-XX-0100

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012.525.0

M

A02

A01

B02

B01

Site Boundary

Planning Revision Note

Building A01

- 5m² balcony added to unit A01-01-03 with 1385mm high railing to front.

Building A02

- Tenure change for unit A02-06-02 and A02-06-05.
- A02-06-02 and A02-06-03 balcony alignment corrected.
- A02-06-03 terrace guarding added.

Building B01

- 700mm concrete spandrel panels added to eastern windows of units B01-00.1-01 and B01-00.1-04.
- Communal garden to west of Building B01 reconfigured to 3no. private gardens.

1	Planning Revision	GEM	RPJ	AUG	2020
0	Planning Submission	RPJ	CW	MAR	2020
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Client
CLL

Project
Amos Grove

Title
Proposed Site Plan

Scale:
1:500 @ A1 / 1:1000 @ A3

MLUK-721-A-P-XX-1010

1

Block Plan

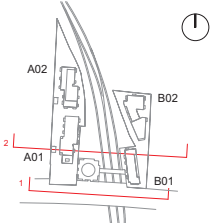


Strategic layout & Landscaped Buffers

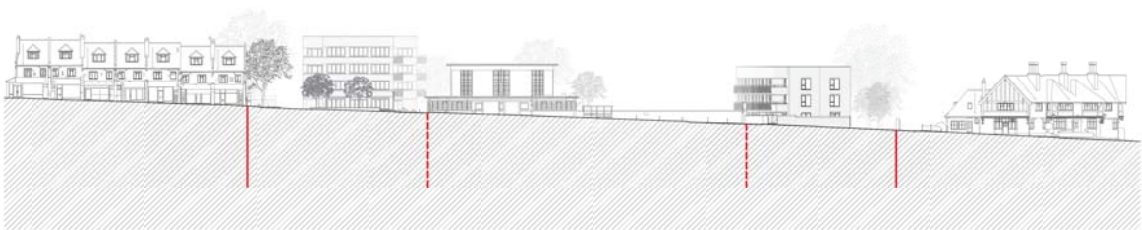
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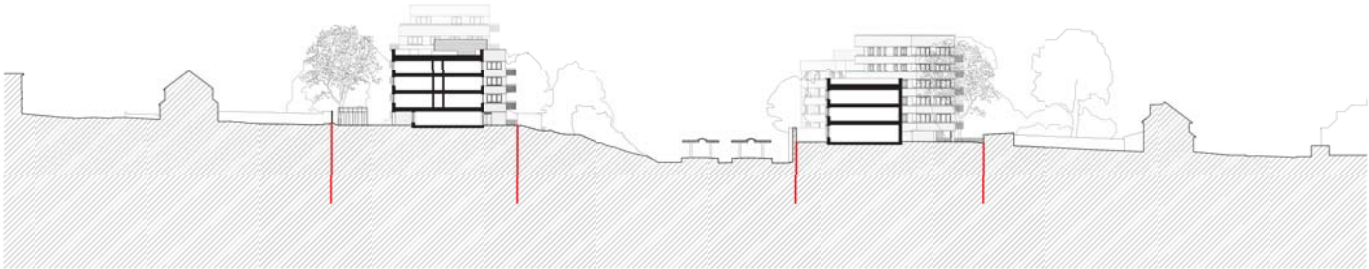
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Site Boundary



Proposed Site Elevation 1 - South



Proposed Site Section 2 - South

0	Planning Submission	RPJ	CW	MAR 2020
Rev	Details	Drwn	Chkd	Date

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Client
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Project
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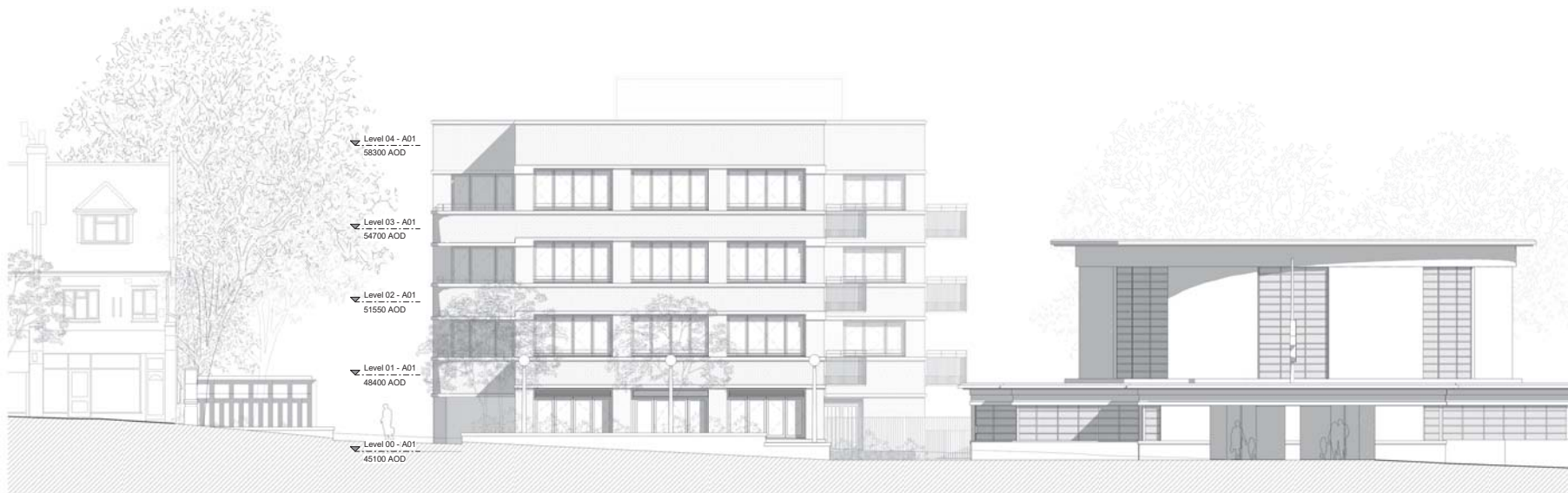
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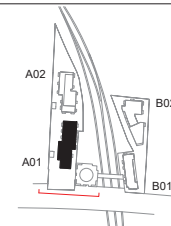
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Client
CLL

Project
Amos Grove

Title
Public Square Elevation - South

Scale:
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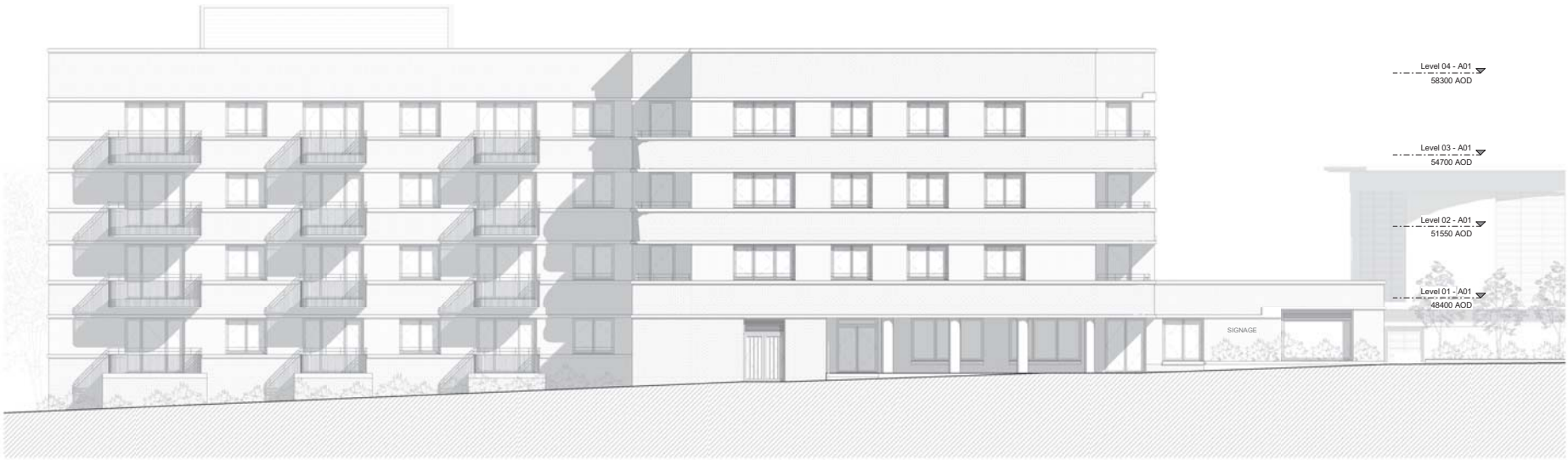
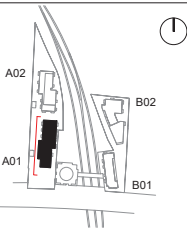
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Client
CLL
Project
Amos Grove

Title
Bldg A01 Elevation - West

Scale:
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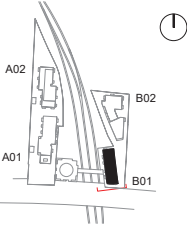
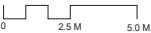
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Client
CLL
Project
Amos Grove

Title
Bldg B01 Elevation - South

Scale:
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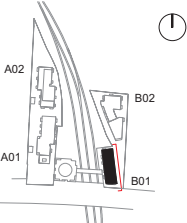
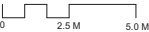
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Planning Revision Note

- Building A01
- 5m² balcony added to unit A01-01-03 with 1385mm high railing to front.
- Building A02
- Tenure change for unit A02-06-02 and A02-06-05.
 - A02-06-02 and A02-06-03 balcony alignment corrected.
 - A02-06-03 terrace guarding added.
- Building B01
- 700mm concrete spandrel panels added to eastern windows of units B01-00.1-01 and B01-00.1-04.
 - Communal garden to west of Building B01 reconfigured to 3no. private gardens.

1	Planning Revision	GEM	RPJ	AUG	2020
0	Planning Submission	RPJ	CW	MAR	2020
Rev	Details	Drwn	Chkd	Date	

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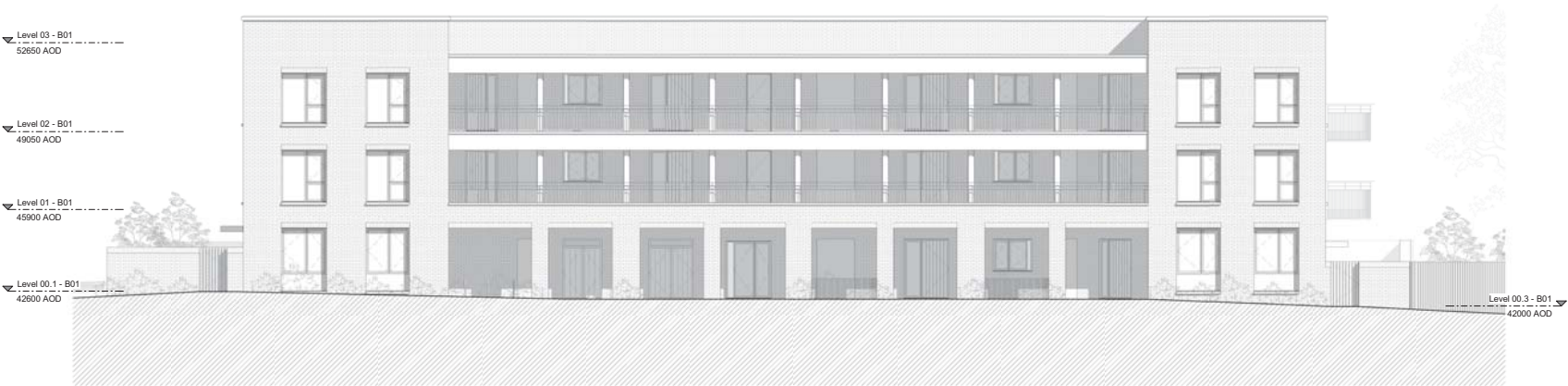
Client
CLL
Project
Amos Grove

Title
Bldg B01 Elevation - East

Scale:
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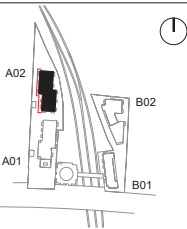
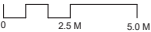
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Level 07 - A02
66600 AOD

Level 06 - A02
63075 AOD

Level 05 - A02
59400 AOD

Level 04 - A02
56250 AOD

Level 03 - A02
53100 AOD

Level 02 - A02
49950 AOD

Level 01 - A02
46800 AOD

Level 00 - A02
43500 AOD

Level B1 - A02
40200 AOD

0	Planning Submission	RPJ	CW	MAR 2020
Rev	Details	Drwn	Chkd	Date

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Client
CLL
Project
Amos Grove

Title
Bldg A02 Elevation - West

Scale:
1:100 @ A1

MLUK-721-A-P-A2-3121

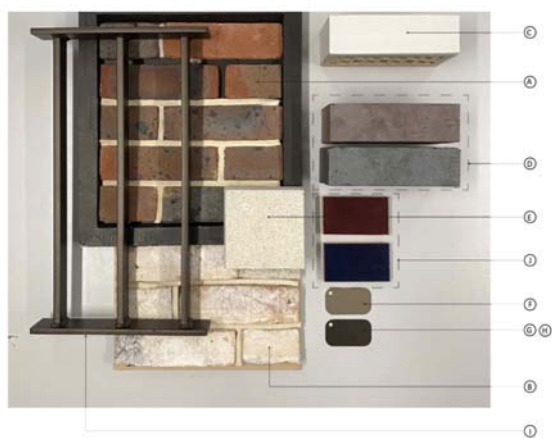
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Design and Access Statement: Extract (View north towards A02)



Site A 'Homezone' - View north to A02

Design and Access Statement: Extract (Materials and Details)



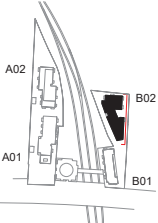
Item	Element	Material
A	Principal Brickwork 01	Red / Orange handmade variegated clamp-fired stock facing brick, natural grey mortar
B	Principal Brickwork 02	White/buff textured handmade waterstruck brick, flush white mortar
C	White Glazed Brickwork Blend	White / off white blend, white mortar tbc
D	Pinch Brick	Staffordshire bisected blue brick, dark grey mortar
E	Precast banding - Sills, Lintels & Copings	Architectural precast - White grey, buff aggregate tbc
F	Windows	PPC aluminium windows, RAL 7006 tbc
G	Entrance doors	PPC aluminium, dark bronze tbc
H	Refuse, Cycle store and Plantroom doors	PPC Steel Insured door, hot zinc dipped, dark bronze tbc
I	Balcony and Balustrade Steel railings	PPC hot zinc dipped, dark bronze tbc
J	Glazed tile	Oxblood blend or Navy blend tbc



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Client
CLL
Project
Amos Grove

Title
Bldg B02 Elevation - East

Scale:
1:100 @ A1

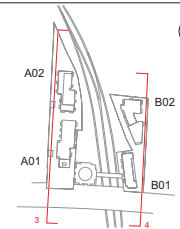
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— Site Boundary

Planning Revision Note

- Building A01
- 5m² balcony added to unit A01-01-03 with 1385mm high railing to front.
- Building A02
- Tenure change for unit A02-06-02 and A02-06-05.
 - A02-06-02 and A02-06-03 balcony alignment corrected.
 - A02-06-03 terrace guarding added.
- Building B01
- 700mm concrete spandrel panels added to eastern windows of units B01-00.1-01 and B01-00.1-04.
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1	Planning Revision	GEM	RPJ	AUG 2020
0	Planning Submission	RPJ	CW	MAR 2020
Rev	Details	Drwn	Chkd	Date

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Client
CLL
Project
Amos Grove

Title:
Proposed Site Elevations & Sections

Scale:
1:500 @ A1 / 1:1000 @ A3

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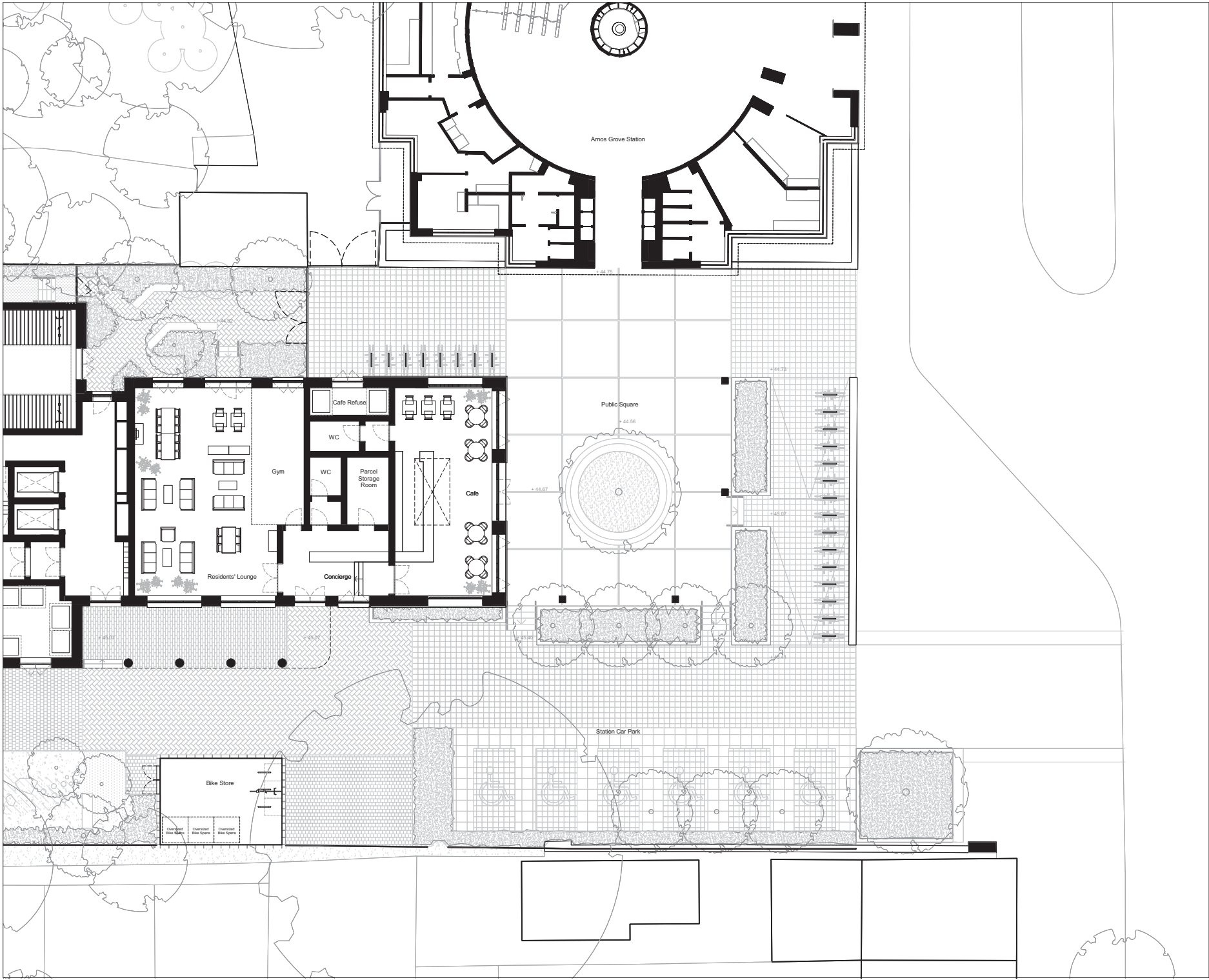
Original issued 01



Proposed Site Elevation 3 - West



Proposed Site Elevation 4 - East



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A02 B02
A01 B01

0 Planning Submission RPJ CW MAR 2020
Rev Details Drwn Chkd Date

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Client
CLL
Project
Amos Grove

Title
Public Square - Level 00 Proposed GA Plan

Scale:
1:100 @ A1 / 1:200 @ A3

MLUK-721-A-P-A0-1200 0

Public Square



The new Station Square and access to residential blocks A01 and A02



Bird's-eye view of the proposed Public Square

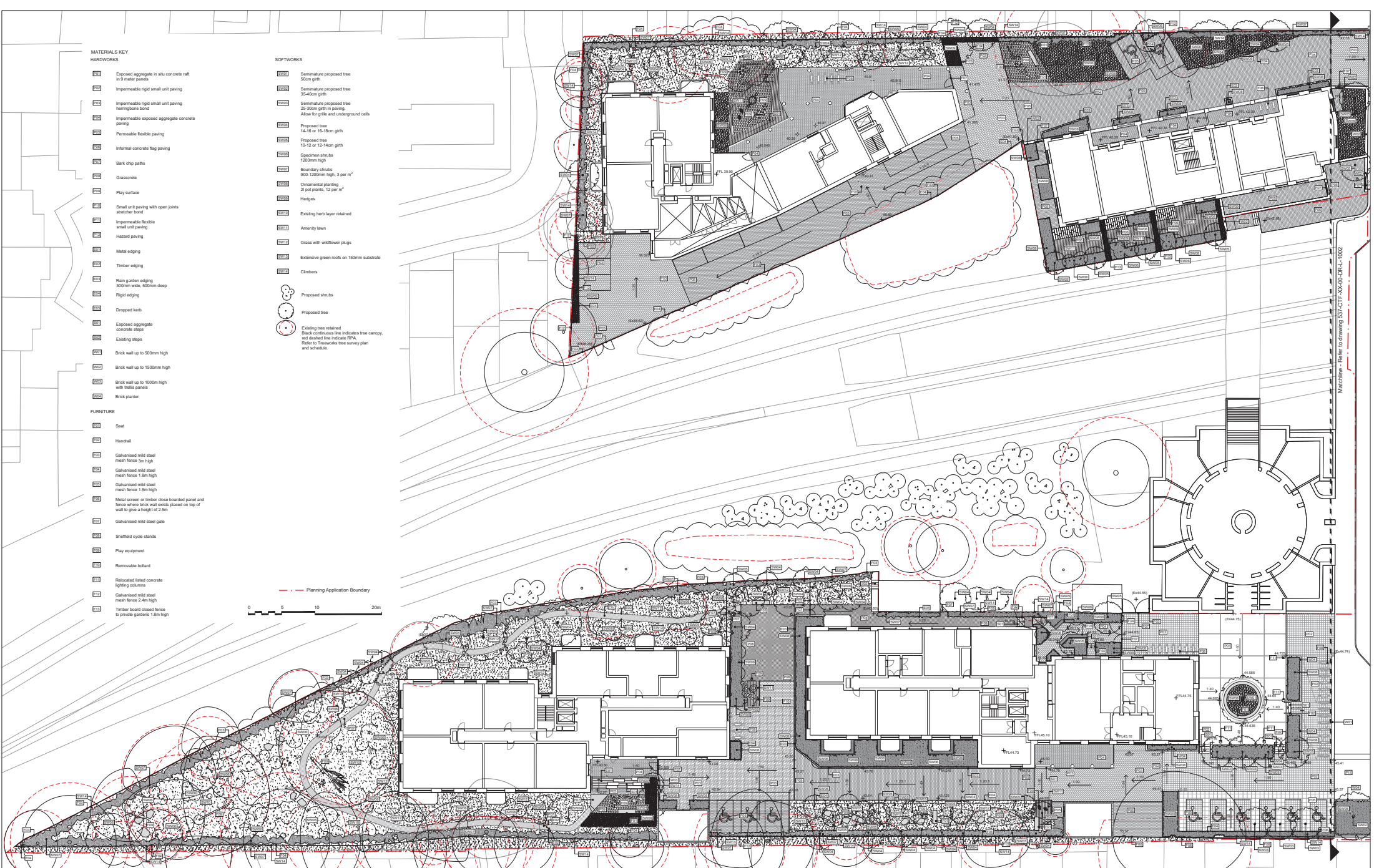


Proposal plan for the new Station Square



Tree Removal, Retention & Proposed Strategy





Do not scale drawings. All dimensions to be checked on site.
Errors to be reported immediately to landscape architect.
To be read in conjunction with all relevant architects, services and engineers drawings.

Revision Tracker

0 - Planning Submission
01 - Amendments to boundary fences.
B1 communal garden converted into
private gardens for ground floor units.

Status

P
P

Mar 2020
AGO 2020

Churchman Thornhill Finch

London
3rd Floor, 14 Bowden Street,
Kennington, London SE11 4DS
+44(0)20 3727 6760

Date

08.11.2019

Scale

1:250A1
FPVCC

Location

LB Enfield
Connected Living London

Client

Bridal
1.14 Temple Studios,
Temple Gate, BS1 6QA
+44(0)20 3727 6768

Arnos Grove
Landscape General Arrangement Plan

537-CTF-XX-00-DR-L-1000

Status

P

Revision

01