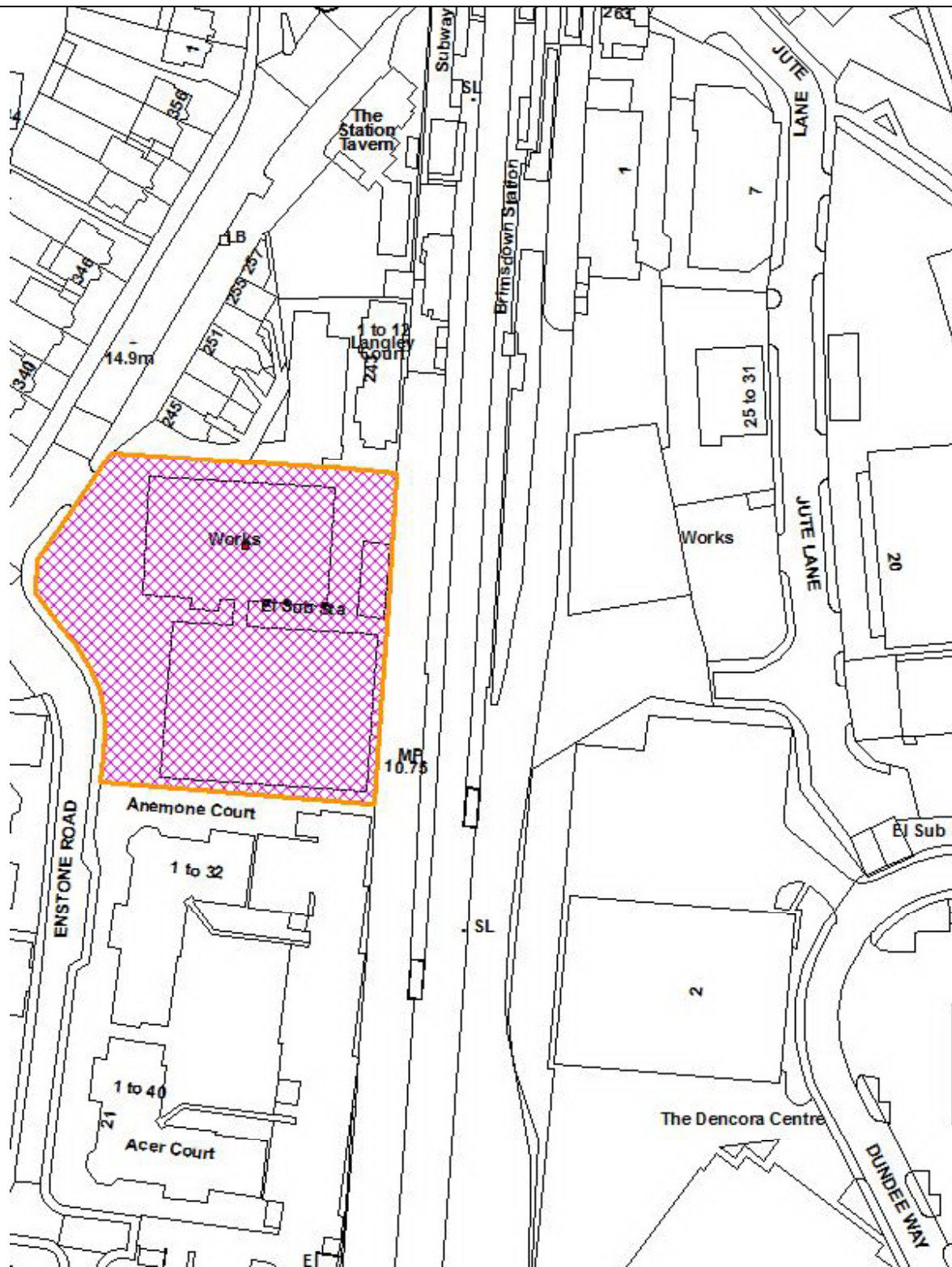


LONDON BOROUGH OF ENFIELD		
PLANNING COMMITTEE		Date : 15 December 2020
Report of: Head of Planning	Contact Officer: Andy Higham: 020 8132 0711 David Gittens: 020 8132 0870	Ward: Enfield Highway
Application No: 20/01526/FUL		Category: Full Application – Major
LOCATION: 241 Green Street, Enfield, EN3 7SJ		
PROPOSAL: Redevelopment of site involving demolition of the existing buildings and erection of a mixed-use development ranging from 2 storeys to 16 storeys comprising 148 residential units in three blocks, together with commercial floorspace (classes A1, A2, A3, B1, D1 and D2) at part ground / first floor levels together with substation, car parking, cycle parking, amenity areas, landscaping and associated works.		
Applicant Name & Address: Stonegate Homes Ltd c/o Agent		Agent Name & Address: Gill Eaton, Icen Projects Da Vinci House 44 Saffron Hill London EC1N 8FH
RECOMMENDATION: Notwithstanding any direction from the Mayor of London to the contrary, that planning permission be GRANTED, subject to conditions and a S106 legal agreement		

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



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Scale 1:1250

North



1. Note for Members

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

2. Recommendation / Conditions

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

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

- A Referral of the scheme to the Mayor for London (Stage 2);
- B The satisfactory completion of a S106 planning obligations agreement to secure the matters covered in this report; and,
- C The recommended conditions set out below

- 2.2 That delegated authority be granted to the Head of Development Management finalise the wording of the s106 obligations and the conditions as set out below:

Conditions

Development to be begun within 3 years

Development to be in accordance with approved plans

Details of external materials – sample brick panels on site

Details of all roofs and accessible decks.

Details of all surfacing materials

Contamination – remediation Strategy

Noise attenuation between all commercial units and residential above

Noise attenuation and ventilation – details of window specifications and mechanical ventilation arrangements.

Opening hours of commercial units– Blocks A, B & C - 07.00 to 21.00 (Monday to Saturday) and 08.00 to 21.00 (Sundays and Public Holidays)

Details of fixed mechanical plant and any associated acoustic screening

Ventilation/extraction details – commercial units – Blocks A, B & C.

Accessible housing – (%age) of dwellings to be built as ‘wheelchair user’ (M4(3)), with all others being ‘accessible & adaptable’ (M4(2))

Details of Fire Strategy Statement to be implemented

Details of landscaping, public realm, play space and equipment, private amenity space

Details of biodiversity enhancement measures (including bat boxes, bird boxes & ‘insect hotels’), boundary treatments & wind mitigation measures

Provision of cycle parking spaces as set out in approved plans

Provision of car parking as set out in Transport Assessment/approved plans

Car Parking Management Plan

Delivery & Servicing Plan

Secured by Design

Elevation details 1:20

Signage strategy for commercial units

SuDS details

No plumbing or pipes

Construction Environmental Management Plan (PRECOMMENCEMENT)

Non-Road Mobile Machinery (PRE-COMMENCEMENT)

Construction Logistics Plan (inc. delivery times) (PRECOMMENCEMENT)
Site Waste Management Plan (PRE-COMMENCEMENT)
Thames Water - Impact Piling Restriction
Thames Water – Network Pressure
Clearance outside of bird nesting season
Implementation of Ecological Report recommendations
Details Of Ecological Enhancements
Tree/ Landscaping Condition(s)
BREEAM accreditation (Excellent) for non-residential space in all Blocks
Submission Of BREEAM Rating Verification
Submission Of Energy Performance Certificate
External Lighting Plan

3. Executive Summary

- 3.1 On 3 November 2020 this application was deferred from consideration of the Enfield Planning Committee to allow further local notification of the proposals to local residents.
- 3.2 The application follows a previous application by the same applicant for the redevelopment of this site to provide 175 residential units and 556 square metres of commercial floor space.
- 3.3 Following significant concerns that were expressed by officers with regard to the design and composition of that scheme, including the significant loss of employment generating floorspace, it was withdrawn by the applicants in September 2019.
- 3.4 The applicants subsequently appointed a new planning and design team who have taken a different design led approach to the redevelopment of the site, which, as a result has increased significantly the employment floor space and whilst making the proposals taller overall, has in the process reduced the bulk of the scheme allowing more light into the site and making better connections with its environs. The scheme now rises from between 2 to 16 storeys in height.
- 3.5 The scheme now seeks to provide 148 residential units (of which 50% by residential unit and habitable room, would be affordable) and 1,144.5 square metres of flexible commercial floorspace.
- 3.6 The scheme has been subject of extensive pre-application discussion and design review, throughout which, overall, the design team has responded positively and the scheme is now considered to constitute a high quality form of architecture that will be regenerative and transformational in its impact on the locality.
- 3.7 The scheme therefore demonstrates the qualities of good growth and has the potential to act as a catalyst for wider regeneration of the area around Brimsdown Station in accordance with the aims and objectives of the North East Enfield Area Action Plan. Accordingly, in view of the above, the scheme is recommended for approval.

4. Site and Surroundings

- 4.1 The subject site is located within the Enfield Highway Ward located approximately 2 miles east of Enfield Town Centre. It is an irregularly shaped site that measures approximately 4600 square metres, located on the eastern side of the junction of Green Street and Enstone Road, just south of Brimsdown Railway Station. Brimsdown Station offers access to rail services on the West

Anglia main line. The site is bounded to the east by railway tracks, beyond which lies a large swathe of land designated as Strategic Industrial Land, containing the second largest industrial estate in London.

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

5. Proposal

- 5.1 The current iteration of the proposals submitted for consideration involves the demolition of all buildings on the site to provide a mixed use scheme with 148 flats, divided into three blocks comprising principally commercial floorspace at ground and first floor levels (Blocks A, B and C), together with ground and first floor level car parking and publicly and privately accessible landscaped areas.
- 5.2 Block A would be located on the site frontage to Green Street forming a continuation of the commercial façade to the immediate north, at the western edge of the site. This would take the form of a part 4 part 5 storey building incorporating commercial floorspace at ground floor levels and containing 19 flats (6 x 1 bed, 10 x 2 bed and 3 x 3 bed).

- 5.3 Block B would be located at the north east corner of the site backing onto Brimsdown Station, and would be a part 8, part 16 storey building. Block B would contain 73 flats (26 x 1 bed, 35 x 2 bed and 12 x 3 bed).
- 5.4 Block C would also back onto the railway and would rise to a part 10, and part 12 storeys. There would be a two storey projection to the front of Block C, fronting Enstone Road that would incorporate commercial floorspace. Blocks B and C would also be connected to each other by a 2 storey podium that would principally contain car parking at ground and first floor levels accessed by a road along the southern boundary of the site. Block C would contain 56 flats (22 x 1 bed, 26 x 2 bed and 8 x 3 bed).
- 5.5 The three buildings would be arranged around a courtyard to the centre of the site, with both soft and hard landscaping elements incorporating extensive planting and permeable paving.
- 5.6 The current scheme constitutes a revision to the originally submitted proposals following concerns expressed by officers that the development proposal was too large in scale. In response to officer's requests, a single storey was removed from Block A (down from 6 storeys to 5 storeys) and two storeys were removed from Block C (down from 14 storeys to 12 storeys). This revision also saw the unit numbers reduce from 154 flats down to 148 flats and the flexible commercial floorspace reduce to 1,144.5 square metres.

6.0 Planning History

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

Decision date	REF	PROPOSAL	Decision
12/09/2019	18/04935/FUL	Redevelopment of site involving demolition of existing buildings and erection of 175 self-contained units (comprising 53 x 1 bed, 104 x 2 bed and 18 x 3 bed) with flexible mixed use on the ground floor (A 1, A2, A3, B1 D1) within 2 blocks comprising (Block A, B and D up to 10 storey's and Block C up to 7 storey's) together with undercroft parking and associated landscaping and parking.	Application Withdrawn
26/01/1979	TP/78/1435	CAR PARK	Granted With Conditions
26/10/1978	TP/78/1280	LIFT HOUSING	Granted With Conditions
03/12/1971	TP/71/1247	USE AS WAREHOUSE	Granted With Conditions
14/11/1966	ENFIELD_II/718	FACTORY	Approved
13/01/1964	ENFIELD_II/662	SINGLE STOREY FACTORY	Granted With Conditions

7. Consultation

Statutory and Non-Statutory Consultees

Internal

7.1 Housing and Regeneration

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

7.2 Traffic and Transportation:

No objections subject to conditions and S106 to secure highways impact mitigation measures.

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

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

7.4 SUDs Officer:

Details of SuDs measures and evidence of implementation will be required by condition.

External

7.5 Greater London Authority

Principle of development: The residential-led mixed used redevelopment of this non-designated industrial site in the Upper Lee Valley Opportunity Area is supported.

Housing: The scheme would deliver 50% affordable housing by habitable room (70% London Affordable Rent: 30% shared ownership), which is strongly supported. The affordability levels must be confirmed and secured. An early stage review must also be secured.

Urban design: The proposal seeks to optimise the site and there are no strategic concerns raised in respect of the height and massing of the proposed development. It should be further demonstrated that the development is appropriately designed such that the residential use does not fetter the future viability and vitality of the adjacent Strategic Industrial Land having regard to “agent of change” principles. The Council should ensure that courtyard open space and playspace is accessible to all residents of the development. A revised fire strategy is required. The scheme proposes 11.7% of units across the development as wheelchair user dwellings, which should be secured by condition.

Transport: A Stage 1 Road Safety Audit on the loading bays is required. Long stay residential cycle parking should be redesigned to ensure compliance with LCDS guidance. Disabled car parking should be provided for the commercial units. A Parking Design and Management Plan, a Construction Logistics Plan, a Delivery and Servicing Plan, a Travel Plan and car club should be appropriately secured.

Sustainable development: Further information is required in relation to the nondomestic Be Lean target, overheating, future-proofing for connection to district heating, PV and heat pumps. A payment to the borough’s offset fund is required and should be secured in the Section 106 agreement. Further information on urban greening and flood risk is required

- 7.6 Transport for London
To comply with the Intend to Publish London Plan, conditions or s106 obligations are required in order to secure highways impact mitigation measures.
- 7.7 Environment Agency
Raise no objection. Recognise Flood Zone 2 designation but recommend applicant refer to Flood Risk Standing Advice.
Recommend procedures to avoid contamination of groundwater.
- 7.8 Thames Water:
Raise no objection to the development with regard to foul water and surface water. Request conditions to:
- Secure a Source Protection Strategy from the developer in order to safeguard groundwater quality;
 - Ensure that no construction/piling takes place within close proximity to nearby strategic water main or other underground water assets.
 - Secure water supply upgrades to serve the development
- 7.9 Designing Out Crime Officer:
Requests a condition that the development secures a Certificate of Compliance to the relevant Secure by Design Guide(s) or achieves Crime Prevention Standards in conjunction with the Metropolitan Police.

Public

- 7.10 Consultation letters dated 29 June 2020 were sent to 621 neighbouring and nearby occupiers (expiring 23.July.2020). Site notices were displayed in the local area from 21 July 2020 (expiring 11 August 2020) and a public notice was displayed in the local press (Enfield Independent) from 08 July 2020 (expiring on 22 July 2020).
- 7.11 In total 6 responses were received from local residents at the time of writing this report from addresses in Brimsdown Avenue (1 letter), Green Street (2

letters), Goldsdown Road (1 letter), Osborne Road (1 letter), Westfield Close (1 letter) all raising objections to the proposal.

7.12 In summary, the following objections have been raised:

- Affect local ecology
- Close to adjoining properties
- Conflict with local plan
- General dislike of proposal
- Inadequate access
- Increase danger of flooding
- Information missing from plans
- Loss of light
- Loss of privacy
- More open space needed on development
- Noise nuisance
- Not enough info given on application
- Over development
- Potentially contaminated land
- Brimsdown almost grinds to a halt most days due to too many people within the area. The Doctors surgeries are full and practically impossible to get an appointment as are the dentists.
- There is not enough parking provided with significantly fewer parking spaces provided than housing.
- The commercial units and the flats in this development will increase the traffic and noise pollution on the surrounding residential roads which do not have permit parking, therefore there will be a risk in the increase of cars that will be parked and will restrict residents from finding a parking space on their road.
- Ideally you wish people to use public transport but in reality most homes have at least one car as well as using some public transport meaning these cars will spill out onto already overcrowded on surrounding residential roads that do not have permit parking.
- 148 residential units is a huge number which will create more traffic on the Green Street, sometimes we have to wait 10-20 min just to leave my driveway because the road is blocked by cars waiting to cross the train line at Brimsdown Train Station to Mollison Avenue.
- What will happen to the small bus station on Green Street? Many commuters and residents use that bus stop for their daily travel yet there is no mention of how that is going to be impacted.
- There is a school on Green Street that will also be affected by the increase of cars passing on the road and this can be dangerous during start and end of school time.
- Increasing the population in Brimsdown must be supported by significant improvement to local transport links. The train service at Brimsdown is shockingly poor, with packed trains, trains frequently cancelled and often already there is not enough space on a train to get on with an hour wait for the next train. Housing developments such as this one must be supported by significant infrastructure developments at Brimsdown.
- The sky line will be affected by the height of this development. Around Brimsdown Station there isn't any higher building than 3 levels so we object to this high development that will totally change the character of the area.
- High buildings like this should be surrounded by much bigger open green landscape.
- Our children have asthma and we are already in a polluted street, the development would only bring more pollution.

- The building is very tall, so we would lose privacy regarding our local garden.
- The timing is ridiculous, as many people cannot go online or to local library to comment or research on the development.
- This development is far too high especially for the local area as there is nothing approaching this height nearby, even the flats at the end of alma road quite some way away and the only thing any were in this area of Enfield like it have been reduced in height for the sake of quality of life.
- Public transport is already dangerously overcrowded especially at peak times trains at Brimsdown Station are packed and buses stopping outside the development are standing room only. Even if more buses are laid on, that would result in more pollution on a residential street.
- Deliveries and other day to day activities will bring more congestion and pollution to this area as well, not to mention the noise and air pollution a construction project of this size will bring as it is being developed.
- There is concern at the potential land and water pollution from digging over a former industrial plot that could be released into local ground water and poison our land.
- Local shops are already overcrowded and will be even more so.

7.13 On 13 November 2020 a further 621 letters were sent to neighbouring and nearby occupiers, giving a further 14 days to provide representations (expiring 27 November 2020).

7.14 In response to the further consultation, an additional 29 responses were received. 28 of the respondents objected to the proposals

- The site has been accessed and filled with over 200 tonnes of contaminated waste that has not been cleared.
- The contamination reports all need to be redone they are all very out of date and in any case, samples were NOT taken from the main warehouse where the Towers will actually be built! Given that the site is now full of waste I believe that Environmental Health should insist on a new set of contamination reports be run and the application should not even be considered before this is done.
- The Mix of Units is inappropriate. 85% of the units will be 1- and 2-bedroom units which is against the Council's policy. Having fewer 3-bed-units keeps the child yield purposely low and as a result, the developer is able to say that green space requirements are adequate because they rely on a child yield calculation.
- The Density is beyond top range and therefore represents a huge over development of the site.
- The nature of the tall buildings will mean that they are noisy because noise travels up and it also radiates outwards.
- Existing properties south of the railway have already sited noise as an issue and they are not as tall as the towers proposed there.
- This proposal would be thrown out in any other more affable part of Enfield.
- The applicant has commissioned a noise report in relation to Plant Equipment. It states that the plant equipment will be at a level of decibels which will cause problems for the blocks adjacent and that mitigations will be required.

- The plan has a ramp which runs to the side of the building at level 2 elevation and that will be pumping fumes at altitude into the 4-story block at Enstone Road. It will also be a noise nuisance.
- The London Fire Brigade sent recommendations to ALL London boroughs that tall residential buildings over 35 meters should be avoided. Its due to Grenfell Tower - the Fire Brigade simply does not have the ability to rescue people above that height. The plan proposes towers which are 50 and 60 meters tall. What happens WHEN (not if) there is a fire?
- The plan has very poor access for the Fire Brigade.
- Car parking allocation is very poor (less than 0.5 a car per unit) and there was an admission from the applicant's agent at the last meeting that proposed plan did not provide sufficient parking onsite. As a result, cars would be displaced onto the other residential roads which will impact on other residents.
- The Agent indicated a 30% displacement or overspill as a result of inadequate parking. This was wholly unrealistic (it represents just 15 additional cars) and it will be far more than that and that does not even include visitors to the location or commuters that travel from Brimsdown and park their cars locally before jumping on the train.
- People in this area use their cars to access the M25, to do school runs and to work at the Industrial sites to the west of the line. The train is hugely expensive and the car can be far cheaper. Add in the current pandemic situation where we are actively encouraged to avoid trains. Furthermore, the cycle lanes on Hertford Road have further exacerbated the congestion as bus stops are now in the middle of the road. And virtually no one is using the cycle path. Another 500+ people moving into the area will add to this chaos - there will be complete grid lock.
- The site is not a designated site for a tall building as per the Councils own plans; there is an obsession to build higher rather than build smarter.
- It will significantly alter the character of the area in a negative way. Just look at the CGI images and one can easily see that these towers are a huge eye sore.
- It is telling that none of the CGI images which were commissioned show a view directly from Green Street for those which are most impacted by this. I think this is a huge oversight and one which must be addressed. We have images from Brimsdown School, from the railway crossing to the West, from Osborne Road but NONE from directly opposite Green Street.
- Cross Rail 2 has been cancelled and yet it is mentioned repeatedly as a reason for this development. The plans were clearly constructed before the pandemic and before funding for cross rail was withdrawn. As such It represents data which is completely out of date and doesn't include the new reality of COVID.
- It does not represent a piece of quality architecture as they developers have not consulted with the wider neighbourhood at all. The Applicant has been reluctant to share the resident feedback information despite us making requests under freedom of information to do so. Why has the applicant not made this information available to the planning committee?
- Using terms like sculpted and fluted from planning officers to make the build sound palatable and high quality is wrong. These are typical selling terms and planning officers should avoid using them as they sound like agents for the applicant rather than impartial planning officials.
- Saying there is a transition between the smaller elements and the taller elements is moot -

- the buildings are 4.5 times higher than the surrounding tallest flats. And unlike those
- buildings they are not set back 40 meters from the road this right up against the boundary
- line making them more imposing and blocking light.
- Very poor consultation - my husband has had to knock on neighbours' doors to make them aware of what's happening and all that during a national lockdown. It's somewhat shameful that a smarter way of interacting with effected parties could not have been formulated.
- Several councillors expressed concern about the process. Instead of being smart there has
- been a rehash of a failed consultation. When people write in to express their concerns its because of the community of people that have been knocking on doors and making people aware and not because of any work carried out by the planning team.
- Enfield has a high concentration of other nationalities and no attempt whatsoever has been made to localize documents and to communicate with the wider public. Knocking on doors has made us realise that many local residents do not speak English, do not have internet and often rely on young children to communicate on their behalf.
- The applicant claims that local ward councillors were consulted which is untrue. It brings into question the integrity of the developer.
- What happens when unsociable activities like parties take place on these green roofs?
- (against the council's own policy).
- Once again, many residents have not received letters and some have received multiple ones at one location. My neighbour got five letters and we got two! That's 7 letters across two households! While other people have not received any communication whatsoever. Councillors stated clearly at the last planning meeting that "smarter" ways of communicating must be found.
- Enfield Chase and Gordon Hill have properties near the train stations which are not towers. Lack of family units has nothing to do with the typology of the location at all. It's down to greed.
- The planning officer described the two-bedroom units as being larger than average and being suitable for being occupied by 4 persons - this is nonsense. The units are not of larger size than the average (check the plans) and it is not a COVID safe density level.
- Car clubs are spectacular failures at resolving issues around traffic congestion and parking. They are also expensive to run and insure and are wholly unsuitable for this fairly poor area of Enfield.
- I disagree with the transfer from commercial to residential - more strategic land is supposed to be earmarked for this.
- In fact, the GLA have **rejected the report** provided by the applicant stating clearly that they are NOT CONVINCED about this not being an area for commercial space.
- The site is on a Flood Plain. The applicant has instructed a consultant to do an assessment which in my opinion is a very poor piece of work. It makes huge unsubstantiated assumptions. It is predicated on stating that the risk is low because the lower floors are commercial rather than residential. And I believe it's the reason that the applicant wants to have a commercial element despite there being absolutely no demand or need for it in the area.

7.15 A further respondent wrote in favour of the application, expressing an interest as to when the proposed units may become available.

8. Relevant Planning Policies

8.1 National and Regional Policies

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

8.2 London Plan (2016)

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

Policy 2.6: Outer London: vision and strategy
Policy 2.7: Outer London: economy
Policy 2.8: Outer London: transport
Policy 2.14: Areas for regeneration
Policy 3.1: Ensuring equal life chances for all
Policy 3.2: Improving health and addressing health inequalities
Policy 3.3: Increasing housing supply
Policy 3.4: Optimising housing potential
Policy 3.5: Quality and design of housing developments
Policy 3.6: Children and young people's play and informal recreation facilities
Policy 3.7: Large residential developments
Policy 3.8: Housing choice
Policy 3.9: Mixed and balanced communities
Policy 3.10: Definition of Affordable Housing
Policy 3.11: Affordable housing targets
Policy 3.13: Affordable Housing thresholds.
Policy 3.14: Existing housing
Policy 3.15: Co-ordination of housing development and investment.
Policy 3.16: Protection and enhancement of social infrastructure
Policy 3.17: Health and social care facilities
Policy 4.1: Developing London's economy
Policy 4.4: Managing Industrial Land and Premises
Policy 5.1: Climate change mitigation
Policy 5.2: Minimising carbon dioxide emissions
Policy 5.3: Sustainable design and construction
Policy 5.7: Renewable energy
Policy 5.10: Urban greening
Policy 5.11: Green roofs and development site environs
Policy 5.12: Flood risk management
Policy 5.13: Sustainable drainage
Policy 5.15: Water use and supplies
Policy 5.18: Construction, excavation and demolition waste
Policy 5.21: Contaminated land
Policy 6.9: Cycling
Policy 6.10: Walking
Policy 6.12: Road network capacity
Policy 6.13: Parking
Policy 7.1: Lifetime neighbourhoods
Policy 7.2: An inclusive environment
Policy 7.3: Designing out crime
Policy 7.4: Local character
Policy 7.5: Public realm
Policy 7.6: Architecture
Policy 7.7: Location and design of tall and large buildings
Policy 7.14: Improving air quality
Policy 7.15: Reducing noise and enhancing soundscapes
Policy 7.18: Protecting local open space and addressing local deficiency
Policy 7.19: Biodiversity and access to nature

The London Plan – Intend to Publish (December 2019)

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

GG1 Building Strong and Inclusive Communities
GG2 Making the Best Use of Land
GG3 Creating a Healthy City
D2 Infrastructure Requirements for Sustainable Densities
D3 Optimising Site Capacity Through Design Led Approach
D4 Delivering good Design
D5 Inclusive Design
D6 Housing Quality and Standards
D7 Accessible Housing
D8 Public realm
D9 Tall buildings
D11 Safety, security and resilience to emergency
D12 Fire Safety
D14 Noise
S1 Delivering London's Social Infrastructure
S3 Education and childcare Facilities
S4 Play and informal recreation
G5 Urban greening
G6 Biodiversity and access to nature
G7 Trees and woodlands
GG1 Building Strong and Inclusive Communities
GG2 Making the Best Use of Land
GG3 Creating a Healthy City
GG4 Delivering the Homes Londoners Need
H4 Delivering affordable housing
SI1 Improving air quality
SI2 Minimising greenhouse gas emissions
SI3 Energy Infrastructure
SI5 Water Infrastructure
SI7 Reducing Waste
SI12 Flood Risk Management
SI13 Sustainable Drainage
T1 Strategic approach to transport
T2 Healthy Streets
T4 Assessing and Mitigating transport Impacts
T5 Cycling
T6 Car Parking
T7 Deliveries, servicing and construction
T9 Funding Transport Infrastructure through planning
DF1 Delivery of the plan and planning obligations

8.5 Enfield Core Strategy (2010)

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

8.6 Enfield Development Management Document (2014)

DMD1: Affordable Housing on Sites Capable Providing 10 units or more
DMD3: Providing a Mix of Different Sized Homes
DMD6: Residential Character
DMD8: General Standards for New Residential Development
DMD9: Amenity Space
DMD10: Distancing
DMD 37: Achieving High Quality and Design-Led Development
DMD 38: Design Process
DMD 43: Tall Buildings
DMD45: Parking Standards and Layout
DMD47: New Road, Access and Servicing
DMD48: Transport Assessments
DMD49: Sustainable Design and Construction Statements
DMD50: Environmental Assessments Method
DMD51: Energy Efficiency Standards
DMD53: Low and Zero Carbon Technology
DMD55: Use of Roofspace/ Vertical Surfaces
DMD57: Responsibly Sourcing Materials, Waste Minimisation, Green Procurement
DMD58: Water Efficiency
DMD59: Avoiding and Reducing Flood Risk
DMD 60: Assessing Flood Risk
DMD 61: Managing surface water
DMD 62: Flood control and mitigation measures
DMD 63: Protection and improvement of watercourses and flood defences
DMD64: Pollution Control and Assessment
DMD65: Air Quality
DMD 66: Land contamination and instability
DMD68: Noise
DMD69: Light Pollution
DMD 70: Water Quality
DMD 71: Protection and enhancement of open space
DMD 72: Open Space Provision
DMD 73: Child Play Space

DMD 76: Wildlife corridors
DMD 77: Green chains
DMD 78: Nature conservation
DMD79: Ecological Enhancements
DMD80: Trees on development sites
DMD81: Landscaping

9. Analysis

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

- Land use – Principle of proposed uses
- Housing Need/Affordability/Dwelling Mix
- Design
- Tall Buildings
- Transportation
- Residential Quality
- Public Realm and Open Space
- Secured By Design
- Fire Safety
- Environmental/Sustainability concerns
- Legal Agreement

Land Use

- 9.2 The application site constitutes a non designated, non conforming site in employment use, surrounded on all accessible sides by residential uses, that is located within the Upper Lea Valley Opportunity Area. An area defined by the London Plan 2016 as being capable of supporting over 20,000 new homes and an indicative employment capacity of 15,000 new jobs. The Mayor's Intend to Publish London Plan identifies the Opportunity Area as being capable of providing a minimum of 21,000 new homes and 13,000 new jobs. London Plan Policy 2.13 seeks developments in opportunity areas to optimise development outputs and densities, provide necessary social and other infrastructure to sustain growth.
- 9.3 London Plan Policy 3.3 stresses the need to realise brownfield housing capacity whilst the Intend to Publish London Plan Policy H1 calls for housing intensification on appropriate sites in low density commercial use.
- 9.4 London Plan Policy 4.4 requires boroughs to adopt a rigorous approach to industrial land management to ensure sufficient industrial land is available to meet current and future demand.
- 9.5 However, Policy 4.4 also advocates the release of surplus industrial land so that it can contribute to strategic and local planning objectives, especially to provide more housing. This is further reflected in Policies E4 and E7 of the Mayor's Intend to Publish London Plan which seeks a plan-led approach to the release of industrial land. Policy E7.C resists the loss of non-designated industrial sites, unless:

- (1) it has been demonstrated that there is no reasonable prospect of the site being used for the industrial and related purposes;
 - (2) the site has been allocated in an adopted Local Development Plan Document for residential or mixed-use development; or
 - (3) industrial, storage or distribution floorspace is provided as part of mixed-use intensification.
- 9.6 There is no site allocation relating to this site, and it is not proposed to replace like for like industrial floorspace as part of the proposed development. The total existing floor area is 3318 square metres in B8 use and the development proposes to re-provide flexible commercial floorspace of 1,144.5sqm (A1, A2, A3, B1, D1, D2). This will lead to a net loss of employment generating floorspace of 2,173.5 square metres.
- 9.7 With regard to the issue of the site being used for industrial purposes in the 21st Century, the applicant commissioned an Industrial Market Summary Report by Lambert Smith Hampton which concluded amongst other things, that:
- The property was owner occupied by Ripmax Ltd since 1972 and had become unviable for long term use to the business given their requirement for significantly more warehouse/storage room and less office space;
 - The low eaves and mezzanine heights also made the space not well suited to their long-term use and that significant capital expenditure would be required to bring it up to the required standard;
 - The long-term prospects of the site are limited by a number of physical constraints, reducing its suitability as an employment site. It is outside the Brimsdown Industrial Estate (the SIL) and the railway forms a clear boundary between the two;
 - The access of the site from the major road network is constrained and difficult, particularly for larger vehicles. (From the East, the height is restricted on Green Street as it crosses the railway. From the North, weight restrictions apply, from the South and East HGVs would need to negotiate the congested roads and residential areas.)
 - HGV access is restricted by large amounts of on street parking; by the level crossing on Green Street and by the nearby Brimsdown Primary School;
 - Interest from B8 occupiers is therefore restricted; the site is also less attractive to B2 operators given the surrounding residential properties and mainly residential character of the area (which would also lead to concerns that there would be restrictions on hours of operation and such like, further deterring modern occupiers);
 - The review demonstrates that there is a significant supply to serve existing and future industrial requirements in the Enfield area and that the availability of Grade A space further lessens demand for second hand units with physical constraints such as this site.
- 9.8 It can also be reasonably argued that a mixed use residential/industrial scheme on the site could render many of the existing constraints upon future industrial occupiers.
- 9.9 Whilst the application offers no detail on the number of jobs proposed or the number of jobs which could previously have been accommodated on site, or the employment density that could be achieved on site, it is known that B8 (warehouse/storage) uses are notoriously low density employment activities. In this context, the proposed flexible commercial floorspace has the potential to employ significantly more people than a warehouse use.
- 9.10 With the presence of large amounts of designated Strategic Industrial Land in close proximity, it would be reasonable to assume that there would be far more

specialist attractive sites available for industrial/warehouse uses to locate than the application site, within premises that were not so constrained.

- 9.11 In addition, it is recognised that the site is physically constrained by residential development on both sides and is relatively constrained in terms of access from the local road network constraints that are likely to be a hindrance to a future stand-alone industrial development or occupancy coming forward on the site.
- 9.12 When viewed in the context of the reuse of a brownfield site and the level of intensity proposed for the redeveloped site which would still retain some modern flexible commercial floorspace that would provide some welcome active frontage to Green Street. The redevelopment of this non-designated industrial site has the potential to deliver some of the regenerative and transformative positives anticipated by the designation of the Upper Lea Valley Opportunity Area. In this context it is considered that the loss of this non conforming site, to a residential led mixed use redevelopment can be reasonably considered.
- 9.13 Once the loss is considered acceptable, in accordance with policy DMD22, mitigation/compensation for the loss of employment floorspace should be provided in accordance with Chapter 13 of the Council's S106 SPD.

Housing Need, Affordability and Dwelling Mix

- 9.14 The need for affordable housing remains high in the borough, which is evidenced in the draft Enfield Strategic Housing Market Assessment (SHMA) (2015). London Plan Policy 3.3 and Policy H1 of the Mayor's Intend to Publish London Plan, seek to increase the supply of housing in London by setting borough housing targets. Table 3.1 in the London Plan puts the minimum annual monitoring target for the London Borough of Enfield at 798 additional homes per year between 2015 and 2025. Under Policy H1 of the Mayor's Intend to Publish London Plan, an increased target of 12,460 is set for the period 2019/20 to 2028/29.
- 9.15 London Plan 2016 Policy 3.12 states that Boroughs should seek the 'maximum reasonable amount' of affordable housing having regard to affordable housing targets, and the need to encourage rather than restrain residential development.
- 9.16 The Intend to Publish London Plan Policy H5 and the Mayor's Affordable Housing and Viability SPG set a strategic target of 50% affordable housing for former industrial sites. The Intend to Publish London Plan Policy H6 identifies criteria whereby applications can follow the 'fast track route' set out in the Mayor's Affordable Housing and Viability SPG, critically, it means that these applications need not be accompanied by a financial viability assessment.
- 9.17 Enfield Core Strategy Policy CP 3 and Enfield Development Management Document Policy DMD1 require 40% of units as affordable housing on all sites capable of accommodating 10 or more dwellings, and a housing tenure mix of 70% Social Rented and 30% Intermediate provision.
- 9.18 Local Plan Policy DMD3 states that a mix of different sized homes should be provided in line with the targets in Core Policy 5, as follows:
- Market housing – 20% 1 and 2 bed flats (1-3 persons), 15% 2 bed houses (4 persons), 45%, 3 bed houses, (5-6 persons), 20% 4+ bed houses (6+ persons); and

- Social rented housing - 20% 1 bed and 2 bed units (1-3 persons), 20% 2 bed units (4 persons) 30% 3 bed units (5-6 persons), 30% 4+ bed units (6+ persons).

9.19 Core Policy 5 calls for housing that should prioritise family units. Enfield's most recent draft Strategic Housing Market Assessment (SHMA) (2015) which indicates that the market sector in Enfield should deliver a 50:50 split between 1 and 2 bedroom accommodation and 3 and 4 bedroom accommodation in order to create a more balanced housing stock and address the impact of demographic and household formation change.

9.20 The proposed scheme would deliver 148 new residential units, which would contribute positively to the Council's housing targets and in this context is strongly supported.

Housing Mix and Tenure	1Bed/2pers (Hab Rooms)	2Bed/3pers (Hab Rooms)	2Bed/4pers (Hab Rooms)	3Bed/5pers (Hab Rooms)	Total Units (Hab Rooms)	% By Unit (Hab Rooms)
London Aff. Rent	11(22)	1(3)	22(66)	12(60)	46(151)	50%(51%)
Interm. Mkt Rent	15(30)	4(12)	8(24)		27(66)	
Private	28(56)	6(18)	30(90)	11(47)	75(211)	50%(49%)
Total	54(108)	11(33)	60(180)	23(107)	148(428)	100%(100%)

9.21 Whilst the dwelling size mix deviates from the borough-wide targets it is not necessarily expected that all housing schemes would meet the full range of housing requirements in their mix as site specific characteristics may reasonably demand or warrant such a deviation.

9.22 London Plan Policy 3.8 encourages new developments to offer a range of housing choices in terms of mix and size. However, Policy H10 of the Mayor's Intend to Publish London Plan recognises that a higher proportion of one and two-bedroom units is generally more appropriate in more urban locations such as this.

9.23 Policy DMD3 recognises there may be instances where it is not feasible or desirable to achieve the targets, such as where there is an unsuitable external environment for children and where there are more limited opportunities for amenity space, in combination with a site context which would lend itself to a higher density development, where the delivery of family housing may be more limited.

9.24 With regard to the size of units, however, significant consideration must be given to the proportion of 2-bed/ 4-person homes that form part of the proposal. These larger 2-bedroom dwellings accommodate smaller, younger families. The application proposal incorporates 60 of these smaller family units, and when taken into consideration account with the scheme overall, this would amount to 83 out of 148 units being family sized homes, some 56% of the total units.

9.25 It is important to put the 2 bed/4 person homes into perspective. The Nationally Described Space Standard 2015 has the following floorspace standards:

Flat Type (bedroom/persons)	Minimum Internal Area
1 Bedroom/2Persons	50 Sq Metres
2 Bedroom/3Persons	61 Sq Metres
2 Bedroom/4Persons	70 Sq Metres

3 Bedroom/4Persons	74 Sq Metres
3 Bedroom/5Persons	86 Sq Metres

9.26 Within this development proposal the 11 smaller 2 bedroom/3 person flats proposed all exceed the minimum 61 square metres in floorspace and in general measure generously at:

- 62.5 square metres (6 units);
- 65 square metres (1 unit);
- 66 square metres (3 units); and,
- 76 square metres (1 unit).

9.27 With regard to the 60 larger 2 bedroom/4 person flats, most of them are very generously proportioned and far exceed the 74 square metres minimum measuring at:

- 78.5 square metres (18 units);
 - 77 square metres (11 units);
 - 76 square metres (3 units); and,
 - 74 square metres (6 units);
-
- 73.5 square metres (3 units);
 - 71.5 square metres (18 units);
 - 70.5 square metres (1 unit);

9.28 What is seen is that above the dividing line, not only do all of the 60 proposed 2 bedroom/4 person flats exceed the minimum floorspace standard, some 38 of the 60 proposed 2 bedroom/4person flats (and indeed one of the 2 bedroom/3 person flats) are so generously proportioned that they are as large or larger than the 74 square metres required for a 3 bedroom/4 person flat.

9.29 Consequently, all of the 2 bedroom/4 person flats are confirmed as family accommodation suitable for families.

9.30 In the context of the above, it is considered that the dwelling size mix is acceptable. Furthermore, the redevelopment of the site can contribute to the Council's substantial housing delivery targets and provide much needed affordable housing for Enfield residents.

Design

9.31 Published London Plan Policy 3.4 of the London Plan 2016 requires development to 'optimise' housing output taking account of public transport accessibility, local context and character and design principles and for proposals which compromise this policy to be resisted.. The policy applies the sustainable residential quality density matrix which cross references existing development intensity against public transport accessibility to find an appropriate background density.

9.32 The application site has an urban character and a Public Transport Accessibility Level (PTAL) of 2, (on a scale where 1 is poor and 6 is excellent). For such sites, the current London Plan density matrix provides an indicative density of 200-450 habitable rooms per hectare (hr/ha) although Policy 3.4 makes clear that the matrix should not be applied mechanically.

9.33 The Intend to Publish London Plan incorporates a different approach to assessing density which is not based on a density matrix approach. Draft Policy

D3 is clear that development must make the best use of land by following a design-led approach that optimises the capacity of sites, with no use of a density matrix as a guide. Policy D3 states that a design-led approach requires consideration of design options to determine the most appropriate form of development that responds at a site's context and capacity for growth, and existing and planned supporting infrastructure capacity (as set out in Policy D2). In doing so it identifies a number of requirements in relation to form and layout, experience and quality and character.

- 9.34 Core Policies 4 and 30 stress the need for high-quality housing and the need to maintain and improve the quality of the built and open environment. Local Plan Policy DMD 37 calls for a design-led approach to 'capitalising' on opportunities in accordance with urban design objectives relating to character, continuity and enclosure, quality of the public realm, ease of movement, legibility, adaptability and durability and diversity.
- 9.35 This proposal for 148 residential units would produce some 428 habitable rooms on a site that measures 4600 square metres would produce a residential density of approximately 930 hr/ha. Whilst this figure would exceed the upper end of the density range and would suggest from a numerical perspective, that the proposal would represent an overdevelopment of the site, it has to be seen in the context of the design led approach to density that is presented by Policy D3 of the Intend to Publish London Plan that seeks to optimise the capacity of sites, without use of a density matrix as a guide.
- 9.36 This goes in hand with Enfield Core Policies 4 and 30 which stress the need for high-quality housing and the need to maintain and improve the quality of the built and open environment. Development Management Document Policy DMD 37 calls for a design-led approach to 'capitalising' on opportunities in accordance with urban design objectives relating to character, continuity and enclosure, quality of the public realm, ease of movement, legibility, adaptability and durability and diversity.
- 9.37 The design-led approach requires consideration of design options to determine the most appropriate form of development that responds at a site's context and existing and planned supporting infrastructure capacity. In this context, the potential confirmation of Crossrail 2 could add to the local transport infrastructure and significantly improve rail services to Brimsdown Station in the process which would make density of the scale proposed easier to countenance should this development proposal proceed to construction.
- 9.38 In addition as a consequence of its careful design, the scheme demonstrates none of the typical symptoms of over development such as overshadowing, overlooking, unneighbourly intervisibility, loss of privacy, north facing single aspect units, cramped internal arrangements etc. Despite its very tall height, physically, the resultant scheme would relate wholly appropriately with the surrounding built context, even though its upper parts would be highly visible in long range views.

Architectural Quality and Design

- 9.39 In relation to the design, mass, height and density, the proposal has been completely redesigned from the previously withdrawn scheme. The proposals put forward a new approach which has been led by the daylight and sunlight considerations and to make more intensive use of a previously-used site adjacent to Brimsdown train station.

- 9.40 It is recognised that the quality redevelopment of this site has the potential to not only improve the built environment of Brimsdown, but also has the potential to be a catalyst for the wider regeneration of many of the low density, urban previously-developed sites in the area.
- 9.41 However, regardless of the potential to be considered as a component piece of a number of nearby redevelopment sites, first and foremost, any proposal for the redevelopment of this site must work appropriately in its existing surrounding context.
- 9.42 The scheme is based around three buildings ranging from 2 to 16 storeys with these three buildings set around a central public space / amenity space. Policy 7.7 of the London Plan 2016 and Intend to Publish London Plan Policy D9 and Enfield Policy DMD43 require the location and design of tall and large buildings to be particularly carefully considered.
- 9.43 The submitted Design and Access Statement sets out clear design and layout objectives for the scheme, which can be summarised as follows:
- Car-free courtyard – for residents and community with residential entrances facing the courtyard and flexible commercial units located at the site entrances;
 - Connecting public space – Courtyard opens up towards the bus terminus with the potential for further pedestrian route northwards toward the train station;
 - Ensuring daylight and outlook – minimising negative impacts to the buildings on neighbouring sites;
 - Maximising the sunlight penetration into the courtyard;
 - Equal massing – designing the two towers with similar angular footprints to give them a distinctive shape;
 - Active frontage-Making entrances visible by locating them on the corners of buildings
 - Connecting roof terraces- Communal amenity space is located above the podium and is accessible to every tenure via a linking corridor.
 - Aspect – all 3 blocks have been designed to maximise aspects from all apartments and to allow for cross ventilation. All internal communal circulation spaces are naturally lit.
- 9.44 The scheme has been designed with a part 4 part 5 storey frontage building that addresses the street scene to Green Street, and together with the two storey podium of Block C, an the angular building footprint introduces the overall design language with the two taller buildings set back against the railway.
- 9.45 This simple hierarchy means that the towers would not appear oppressive in the street scene as the eye would be drawn to the frontage building first.
- 9.46 Effort has been made to look beyond the red line of the site and investigate what new connections could be made to the station and bus stop, as identified by the Enfield Design Panel of December 2019. The desire line along the route from the station to the site has improved with the introduction of an entrance for the commercial space.
- 9.47 The Enfield Design Panel was concerned that the ground floor layout did not maximise the amenity of the courtyard; due to the inactive frontage of the car park grill and podium block which at that time backed onto the playground. This has been improved by moving the play space away from the podium wall and creating a landscaped area that improves its appearance.

- 9.48 The proposed development has an efficient core to unit ratio and proposed shared corridors provide light and ventilation. Both these approaches are strongly supported. The layout of apartments has worked hard to minimise the number of single aspect units from previous iterations, which is supported.
- 9.49 The potential of future car park adaptation into a commercial unit is demonstrated in the Design and Access Statement and is supported. It shows the potential and is a positive approach to considering how internal car parking can be adapted once car dependency has reduced.
- 9.50 The Enfield Design Panel identified the opportunities for development of Brimsdown, referencing the potential offered by Crossrail 2 and the indicative masterplan. However, whilst such an aspiration has the potential to deliver considerable local benefits, the Panel were resolute that the redevelopment proposals must also be acceptable in the current context i.e. without Crossrail 2 or the leanings of the indicative masterplan being in the picture.
- 9.51 The Panel encouraged the relocation of the taller building to the northern side of the site which has been proposed in this application.
- 9.52 The height and massing of Block A fronting Green Street has been reduced during the life of this application by a storey and is now considerably improved in the way that it addresses Green Street. Now a 5 storey building overall, it presents with a 4 storey shoulder to Green Street as it faces the 2 storey houses opposite and now incorporates a single storey (as opposed to two storey) plinth of commercial floorspace.
- 9.53 The reduced height of Block A sits comfortably within the existing context and acts as the lower level foreground to the towers formed by Blocks B and C that will elevate from behind adjacent to the railway. The scale and design of Block A augurs well for the possible future context should proposals come forward for nearby sites in the future, as these would be likely to build on what becomes established on this site and could conceivably continue the principal 4 storey height frontage.
- 9.54 The transition from the two-storey element in the West of Building C to the 5 storey Building A now provides a more fluid transition in the approach along Green Street, travelling East.
- 9.55 The reduction in height by 2 storeys of Building C presents a greater transition in height between the two towers, a noticeable stagger and a change from the heavier building form originally submitted. This noticeable step impacts positively on how the development is experienced from all angles.
- 9.56 The consistent design of the triangular balconies could be successful in making an iconic statement and creating a suite of architecture of landmark quality.

Tall Buildings

- 9.57 London Plan 2016 Policy 7.7 states that tall buildings should generally be limited to sites such as areas of intensification or town centres that have good access to public transport; should only be considered in areas whose character would not be affected adversely by the scale, mass or bulk of a tall or large building; should individually or as a group, improve the legibility of an area, by emphasising a point of civic or visual significance where appropriate, and enhance the skyline and image of London; should contribute to improving the permeability of the site and wider area, where possible; and should make a significant contribution to local regeneration.
- 9.58 The Intend to Publish London Plan Policy D9 states that boroughs should determine if there are locations where tall buildings may be appropriate and proposals should take account of, and avoid harm to, the significance of London's heritage assets and their settings.
- 9.59 Local Plan Policy DMD 43 is a criteria-based policy for considering tall buildings, which justifying text (para. 6.4.1) defines as those "that are substantially taller than their surroundings, cause a significant change to the skyline or are larger than the threshold sizes set for the referral of planning applications to the Mayor."
- 9.60 Given the low-rise nature of the immediately surrounding area and the definition in the Local Plan, at 12 and 16 storeys, the two proposed buildings that would back onto the railway can be considered as 'tall'.
- 9.61 The acceptability of tall buildings is considered against the relevant policy objectives:
- Location;
 - Transport network capacity;
 - Spatial hierarchy and wayfinding;
 - Views;
 - Heritage assets;
 - Architectural quality and design;
 - Amenity space and publicly accessible areas.
 - Micro climate;
 - Safety, servicing and management;
 - Economic benefits; and
 - Cumulative impacts.
- 9.62 Location. The strategic requirement of Intend to Publish London Plan Policy D9 Part B is for a plan-led approach to be taken for the development of tall buildings by boroughs and makes clear that tall buildings should only be developed in locations that are identified in development plans. Local Plan Core Policy 30 and DMD Policy 43 makes clear that tall buildings are permissible in appropriate locations.
- 9.63 Whilst the site is not explicitly identified in the Local Plan as a location that is appropriate for tall buildings, however, this does not necessarily make the location inappropriate. The site is free from immediate constraints as set out under 1a and 1b of DMD43, and is therefore not an 'inappropriate location', as defined by DMD Policy.
- 9.64 Additionally Brimsdown is located in the designated Upper Lea Valley Opportunity Area which has been earmarked in the London Plan for significant growth, but is also an opportunity to breakout from its citation in the North East Enfield Area Action Plan as an easily recognisable district that "lacks identity".

- 9.65 Transport network capacity. The ability of the public transport network to accommodate high-density development is also key to the acceptance of taller buildings. Whilst this site presently has a low PTAL score it does lie adjacent to a site that TfL has reminded the Council if safeguarded as a future work site for the Crossrail 2 project.
- 9.66 Whilst it is considered that infrastructure investment of this order at Brimsdown Station would significantly enhance the area's capability for accommodating a cluster of tall buildings across a group of sites in the locality, for clarity, neither the design of this scheme by the applicants, nor the consideration of its transportation impacts by the Council's Highways Engineer, have been on the basis that the Crossrail 2 scheme is required to be in place or in the pipeline in order to make it acceptable.
- 9.67 Spatial Hierachy and wayfinding. The site meets or partially meets one of the criteria from Policy DMD 43 Part 3 as it is located within the regeneration area of North East Enfield, one of four areas where the spatial strategy in the Council's Core Strategy seeks to focus growth and regeneration, and is in an Area for Regeneration as defined in the Council's Core Strategy and DMD, the London Plan 2016 Policy 2.14 and the Intend to Publish London Plan Policy SD10.
- 9.68 Part 3 of Policy DMD 43 states that in the majority of cases sites meeting more than one of the criteria can be considered an appropriate location. Part 4 of DMD 43 then goes on to list 8 essential criteria that tall buildings must meet. Development must:
- a. Provide a landmark signifying a civic function or location/area of importance and interest and/or add to the legibility of the area;
 - b. Provide adequate amenity space for all residential units;
 - c. Not have a negative impact on existing important and highly visible structures (including other tall buildings);
 - d. Take account of the cumulative impact of tall buildings (including consideration of extant permissions);
 - e. Exhibit high standards of sustainable design and construction and architectural quality, the latter to include consideration of scale, form, massing, proportion and silhouette, facing materials, night-time appearance and relationship to other structures with particular attention to the design of the base and top of the building;
 - f. Contribute to the physical and visual permeability of the site and wider area, aiding legibility and movement;
 - g. Contribute positively to the public realm through the relationship to the surrounding environment and, where appropriate, through the provision of high quality public space;
 - h. Not harm the amenity of properties in the vicinity through shadowing and overlooking
- 9.69 It is considered that the proposed tall buildings would meet all of these criteria.
- 9.70 Views and Heritage Assets. The NPPF advises the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. The NPPF further advises, in weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

- 9.71 The NPPF provides that, in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance.
- 9.72 Whilst the site appears to be within a 'sensitive location', as defined by DMD Policy 43 Part 2, as it lies just within the northern extent of View 9 (approach to Enfield Town), this does not mean necessarily that the proposed buildings are inappropriate; rather, that careful consideration of possible harm to these views is required.
- 9.73 There are no significant heritage assets in close proximity to the site. The Council's Conservation and Heritage Officer had been concerned that tall buildings in this location may have the potential to impact on long range views and the setting of heritage assets in the wider area.
- 9.74 The submitted Townscape and Visual Impact Assessment (TVIA) is helpful. Chapter 8 of the TVIA assesses the effect of the proposed scheme on the setting of local Heritage Assets and from a number of verified views that have been agreed with officers. Whilst the document indicates a minor impact on the setting of Durants Park, in addition to Brimsdown Railway Station and the former Station Tavern, Green Street, the Council's Conservation and Heritage Officer considers that this would amount to less than substantial harm, to non-designated heritage assets and would therefore be acceptable.
- 9.75 The TVIA concludes that the proposed scheme, as a whole, works well as a pair of towers with a distinct architectural style, character and identity. Within none of the identified views is the impact of the proposed tall buildings considered to be harmful. This position is agreed by officers.
- 9.76 Architectural Quality and Design This has already been covered in this report, however, the proposal is seen as an iconic and interesting suite of architecture with good quality residential environment, that will stand out as a significant landmark.
- 9.77 Amenity space and publicly accessible areas: The proposal would create generous amenity space for all of its residents and have an interesting landscaped courtyard that would be permeable and publicly accessible.
- 9.78 Microclimate: the proposal would not create any adverse conditions for overshadowing, loss of daylight or sunlight.
- 9.79 Safety servicing and management: Secure by design will be satisfied by condition, as will a Fire Strategy which has already been confirmed as acceptable by the Council's Building Control Officer.
- 9.80 Economic benefits: It is anticipated that the scheme will be both physically and economically transformative as it would breathe significant life into a vacant and fly-tipped site
- 9.81 Cumulative impacts: There would be no cumulative impacts of tall buildings in this locality as confirmed by the TVIA assessment..

Transportation

- 9.82 London Plan Policy 6.1 seeks to support development that generates high levels of trips at locations with high levels of public transport accessibility. This policy also supports measures that encourage shifts to more sustainable modes and promotes walking by ensuring an improved urban realm. Policies 6.9 and 6.10 address cycling and walking, while Policy 6.13 sets car parking standards.
- 9.83 Intend to Publish London Plan Policy T1 sets a strategic target of 80% of all trips in London to be by foot, cycle or public transport by 2041 and requires all development to make the most effective use of land. Policy T5 encourages cycling and sets out cycle parking standards and Policies T6 and T6.1 to T6.5 set out car parking standards.
- 9.84 Local Plan Core Policies 24, 25 and 26 aim to both address the existing deficiencies in transport in the Borough and to ensure that planned growth is supported by adequate transport infrastructure that promotes sustainable transport choices. Local Plan DMD 45 makes clear that the Council aims to minimise car parking and to promote sustainable transport options.

Parking Quantum

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

Parking layout

- 9.89 The parking layout is generally acceptable Spaces meet the required minimum size of 4.80m x 2.40m and disabled bays having the additional 0.60m to the sides. The average width of the access road is approx. 6.0m wide, which is acceptable for two way working within the car park.

- 9.90 The proposed on street parking bays could be designed 'at grade' so that pedestrians have a level footway to use when the bays are not occupied, but some land would be required to be ceded as public highway to ensure some footway is always available.

Access, circulation, delivery and servicing:

- 9.91 The proposed vehicular access to the site would be from the existing modified access on Enstone Road. Although some modification would be needed to be secured by a planning condition. There are some on-street parking bays in front of the proposed commercial units on Green Street that are intended for servicing those units.
- 9.92 There is some concern that the relatively high number of residential units and the low level of off street parking provision means the site could generate a significant amount of deliveries. In order to facilitate these deliveries, the loading /parking bay on Green Street will be used for HGV shop deliveries with other vehicle deliveries servicing from Enstone Road. The design of the bay will need to be agreed with Enfield Traffic and Transportation.
- 9.93 Refuse vehicles will access the site and turn on site, with refuse storage being located within the 20 metres distance in the Manual for Streets guidance.

Trip and traffic generation:

- 9.94 The forecast residential trip generation has been calculated using the industry standard TRICS methodology.
- 9.95 The main access point from Enstone Road will be able to accommodate the number of trips in the peak hour, as is the junction of Enstone Road and Green lanes. The volume of traffic is unlikely to be significant in terms of overall flow, however there is a concern that traffic could be impacted by the level crossing. However it is accepted that the junction of Green Street/Enstone Road will be able to accommodate expected traffic. Additional surveys/observations may be required to be undertaken by the Council in order to inform any further work relating to traffic queues.
- 9.96 Whilst car journeys are unlikely to have an impact on the traffic, it is important to note that other travel modes (pedestrian, bicycle, bus, train) will also increase and could have an impact on local infrastructure.
- 9.97 For vehicle trips this means 33 in total (in and out) AM peak trips, while for bus services there will be 27 trips in during the AM peak and 37 trips by rail. Estimated pedestrian trips are relatively low by comparison at 12 trips in the AM peak.
- 9.98 It is considered that these impacts can be reasonably accommodated on existing transport networks and services.
- 9.99 Cycle Parking will be provided to London Plan standards. In total 298 long stay spaces will be provided and 16 short stay spaces. This is considered acceptable in terms of number and design.

Conclusions

- 9.100 There are concerns with the level of parking provided and the impact on the existing on street provision. Whilst the location nearby to the station is noted, it is still not considered that the site is in a location to sustain a provision of 0.39

spaces, particularly given the mix of units including a high number of 2xbed and 3xbed. The traffic generated by the commercial units is also a concern.

- 9.100 The additional info on the trip generation has been welcome but the main issue is the site is not within a CPZ which means the parking is a concern and difficult to control, and that although on street parking is not approaching saturation, the number of on street parking spaces is relatively low, which could lead to unacceptable parking pressures. The local traffic associated with the retail also remains a concern.
- 9.101 Section 106 contributions are the likely solution to help mitigate any parking and traffic problems, including the potential funding of a CPZ, which the applicant has agreed to in principle.

Residential quality

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

Accommodation standards:

- 9.103 London Plan Policy 3.5 and Intend to Publish London Plan Policy D6 sets out detailed housing design requirements in relation to floorspace, storage space, layout, floor to ceiling heights, orientation and aspect, overheating, daylight and sunlight and outdoor amenity space. The Mayor's Housing SPG (2016) provides guidance on implementing these policies. Local Plan Core Policies 4 and 5 call for high-quality new housing, Local Plan Policy DMD 8 includes general standards for new residential development and Policy DMD 9 sets out standards in relation to amenity space. The most up-to-date housing quality standards are set out in Intend to Publish London Plan Policy D6.
- 9.104 A minimum of 75% dual aspect dwellings across a single scheme are normally sought and where that is not achievable, single aspect dwellings are one-bedroom only and not north-facing. The proposal demonstrates the development is capable of achieving all of these requirements.
- 9.105 London Plan Policy 3.8 and Intend to Publish London Plan D7 Requires at least 10% of dwellings meet Building Regulation requirement M4(3) 'wheelchair user dwellings', and ii) all other dwellings meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings.' Local Plan DMD Policy 8 has similar policy objectives.
- 9.106 The development is proposed to provide at least 10% of homes to be 'wheelchair user' (M4(3)) and all others to be 'accessible and adaptable (M4(2)) and it is recommended that this is secured by planning condition.

Daylight, sunlight and overshadowing:

- 9.107 The submitted Daylight & Sunlight Assessment outlines the results of the analysis for the planning application, assessing the likely performance of the proposed residential elements. The methodology is in accordance with BRE's "Site Layout Planning for Daylight and Sunlight, A Guide to Good Practice". The daylight and sunlight potential assessments included in this report are based on the indicative massing provided by the architects for the residential blocks submitted in outline. This is considered to represent a more realistic view of the likely daylight and sunlight performance, than the Parameter Envelope.

- 9.108 In respect to daylight, the analysis results indicated that 74.3% of the assessed areas of the facade satisfy the recommendations set out by the BRE, which is accepted as good practice by Planning Authorities. Furthermore, the levels of Vertical Sky Component observed in most of the facades are likely to allow for good daylight levels to be achieved indoors. In order to ensure the internal layouts makes the most of the available daylight potential a few strategies have been set out in the report. Overall, the proposed residential development as a whole is anticipated to achieve good levels of daylighting and is therefore is likely to provide good quality accommodation to the future occupants in terms of daylight. Again, this would be finalised at the reserved matters stage
- 9.109 Having regard to sunlight, the assessment was carried out for all facades of the proposed indicative massing. Overall, the southern facades receive good levels of sunlight throughout the year (APSH) as well as in the winter period (WPSH). It can therefore be concluded that the proposed design offers optimum sunlight potential.

Relationship to surrounding properties – residential amenity

- 9.110 London Plan Policy 7.6 makes clear that development should not cause unacceptable harm in relation to privacy. Intend to Publish London Plan D6 calls for high-quality housing and sets out a number of standards – including ensuring that site layout, orientation and design of homes and common spaces provides privacy for residents. The Mayor’s Housing SPG (2016) Standard 28 is reinforces the need for privacy but cautions against adhering rigidly to minimum distance requirements.
- 9.111 Local Plan Policy DMD8 requires new development to preserve amenity, including privacy and overlooking. Policy DMD10 sets out minimum separation distances between buildings, unless it can be demonstrated that the proposed development would not result in housing with inadequate daylight/sunlight or privacy.
- 9.112 It is considered that the degree of separation afforded between the proposed buildings and their nearest residential neighbours is such that the development will not have an adverse impact upon residential amenity through a loss of light, privacy, outlook or indeed a sense of overbearing.
- 9.113 It is therefore considered that whilst it would be visible, the sensitive location of the mass and scale would mean that it is unlikely that the proposed development would have a materially negative effect on the outlook from neighbouring property

Overlooking and privacy:

- 9.114 London Plan Policy 7.6 makes clear that development should not cause unacceptable harm in relation to privacy. Intend to Publish London Plan D6 calls for high-quality housing and sets out a number of standards – including ensuring that site layout, orientation and design of homes and common spaces provides privacy for residents. The Mayor’s Housing SPG (2016) Standard 28 is reinforces the need for privacy, providing that planning guidance for privacy has been concerned with achieving visual separation between dwellings by setting a minimum distance of 18-21m between facing homes (between habitable room and habitable room as opposed to between balconies or terraces or between habitable rooms and balconies/terraces). These can still be useful yardsticks for visual privacy but cautions against adhering rigidly to minimum distance requirements.

- 9.115 Local Plan Policy DMD8 requires new development to preserve amenity, including privacy and overlooking. Policy DMD10 sets out minimum separation distances between buildings, unless it can be demonstrated that the proposed development would not result in housing with inadequate daylight/sunlight or privacy.
- 9.116 The proposed siting, layout and detailed design of Blocks C will result in views to the south over the rear of adjoining residential properties to the south. However, the illustrative scheme demonstrates that an acceptable relationship between these Plots exists with a separation distance of 25-30m between new balconies and the rear windows of existing dwellings, well outside the Mayor's Housing SPG guidance. Therefore, the future development will ensure the ongoing privacy of neighbouring occupants.

Public realm, open space, trees and urban greening:

- 9.117 Published London Plan Policy 5.10 promotes urban greening and multifunctional green infrastructure to help reduce effects of climate change and Policy 7.21 seeks to protect important trees and secure additional planting. Intend to Publish London Plan Policy G5 supports urban greening and introduces the concept of an Urban Greening Factor and Policy G7 requires existing trees of value to be retained, and any removal to be compensated by adequate replacement.
- 9.118 Local Plan Policy DMD 37 requires all new major residential development to be accompanied by proposals to improve open space provision (with justifying text referring to a borough-wide standard of 2.37 hectares per 1,000 population for park provision). Local plan Policy DMD Policy 80 requires all development that involves the loss of or harm to trees covered by Tree Preservation Orders or trees of significant amenity or biodiversity value, to be refused unless there are exceptional circumstances that can be justified.
- 9.119 In a highly urbanised location, this relatively small site, restricted by roads and a railway has limited opportunity to create significant green infrastructure. The Arboricultural Impact Assessment confirms that there are no existing trees on the site, although there are five large trees outside the site to the south east and south west corners, that overhang the site and are likely to have root protection areas that run beneath the site. However, as these areas are already hard surfaced, and the proposal does not seek to break the ground in these areas, the impact on these trees is likely to be negligible other than potentially some pruning for access purposes.
- 9.120 With regard to the Urban Greening Factor, the proposed landscape strategy includes several of the surface cover types defined in the Intend to Publish London Plan as providing benefits for improved health, climate change adaptation and biodiversity conservation. These include:
- Intensive Green Roof/Vegetation Over Structure;
 - Standard Trees in Natural Soils and Connected Pits;
 - Extensive Green Roof;
 - Flower-rich Perennial Planting;
 - Rain Gardens;
 - Hedges;
 - Standard Trees in Individual Pits;

- Green Wall;
- Amenity Grassland; and,
- Permeable Paving

9.121 As a result, the Urban Greening Factor of the scheme, is anticipated to reach the specified target of 3.8 which, within this residential led mixed use scheme sits appropriately between the expected target of 3 for a commercial scheme and 4 for a residential scheme.

9.122 With regard to open space, the proposed scheme would provide a central courtyard with trees and grassed areas and permeable paving as well as two podium levels creating a cohesive and responsive building relationship with linked green spaces and pleasant public realm.

9.123 Pedestrian movement through the site will be prioritised, using clear routes, and focal points to allow space for residents to access their homes safely. Tree planting will be used to soften the courtyard, providing shade and benefits to air quality.

9.124 Deck level amenity spaces will also be created where children can play safely and with neighbourly supervision with all residents able to use them, promoting socially sustainable communities. these will have high quality planting to enhance the user experience.

9.125 Based on the dwelling mix and proposed tenure split the GLA Child Play Space calculator indicates in the region of 75 children. The applicant has confirmed that they are providing 777 square metres of play space across the scheme which would be satisfactory when using the 10 square metres per child standard of the Mayor's Play and Recreation SPG and Policy S4 of the Intend to Publish London Plan.

Secured by Design:

9.126 Local Plan DMD Policy 37 require all developments to demonstrate and apply the principles and practices of the Secured by Design Scheme. The Metropolitan Police's Designing Out Crime Officer (DOCO) has reviewed the scheme and provided that a suite of further detail is required to ensure the safety of residents, visitors and other users of the space.

9.127 At the request of the DOCO, it is recommended that a planning condition be imposed to ensure Secured by Design certification for the development.

Fire safety:

9.128 The Intend to Publish London Plan Policy D12 requires development proposals to achieve the highest standards of fire safety, embedding these at the earliest possible stage: "In the interests of fire safety and to ensure the safety of all building users, all development proposals must achieve the highest standards of fire safety..." Policy D5 requires proposals to ensure safe and dignified emergency evacuation for all building users.

9.129 The application is supported by a Fire Strategy, as required by emerging London Plan Policy D12. The Council's Building Control Officer has reviewed the strategy and confirms it provides sufficient detail re fire safety to show compliance will be achieved and that access for the fire service can be provided to the required standard.

Flood risk and sustainable drainage

Flood risk:

- 9.130 The Flood and Water Management Act 2010 (FWMA) was introduced to address the increasing risk of flooding and water scarcity, which are predicted to increase with climate change. The act sets out requirements for the management of risks in connection with flooding and coastal erosion. Whilst the Environment Agency is responsible for developing a new national flood and coastal risk management strategy Lead Local Flood Authorities (LLFA), such as the Council will have overall responsibility for development of a Local Flood Risk Management Strategy for their area and for co-ordinating relevant bodies to manage local flood risks.
- 9.131 London Plan Policy 5.12 requires development to meet assessment and management requirements of the NPPF and (where necessary) pass the Sequential and Exceptions tests. Intend to Publish London Plan Policy SI 12 includes similar policy objectives.
- 9.132 The applicant has submitted a Flood Risk Assessment to identify and evaluate the existing level of flood risk to the site.
- 9.133 The site lies partially within fluvial Flood Zone 1 and 2. The presence of commercial floorspace within the lower levels of all the blocks, which were requested by Council officers as a response to the loss of employment generating floorspace as a result of the redevelopment, reduces the already indicated low risk to future residents.
- 9.134 The redevelopment of the site offers the potential to further reduce existing levels of surface water flood risk both to the site and the surrounding area.

Sustainable drainage systems (SuDS):

- 9.135 London Plan Policy 5.13 requires use of SuDS unless there are practical reasons for not doing so, achieve greenfield run-off rates and follow the Mayor's drainage hierarchy. Intend to Publish London Plan Policy SI 13 includes similar policy objectives and includes an updated drainage hierarchy. The Mayor of London Housing SPG (Standard 39) and Sustainable Design and Construction SPG are also relevant.
- 9.136 Local Plan Core Strategy Policy 28 makes clear that SuDS will be required in all development, irrespective of the flood risk at individual sites. Local Plan Policy DMD 61 requires development proposals to demonstrate how they propose to manage surface water as close to its source as possible and follow the Mayor of London's drainage hierarchy. The policy also calls on SuDS to maximise the opportunity for improved water quality, biodiversity, local amenity and recreation value. The Council has prepared a Suds Design and Evaluation Guide (2018).
- 9.137 Whilst SuDS submissions have been made on behalf of the applicant in respect of this application, negotiations between the Council's SuDS team and the applicants consultants are still ongoing. A detailed SuDS strategy that is satisfactory to the Council, will be required by condition

Climate change

- 9.138 The NPPF (Para. 153) requires new developments to comply with local requirements for decentralised energy supply and minimise energy consumption

by taking account of landform, layout, building orientation, massing and landscaping.

- 9.139 London Plan Policy 5.2 sets out the Mayor of London's energy hierarchy: Use Less Energy (Be Lean); Supply Energy Efficiently (Be Clean); and Use Renewable Energy (Be Green) and Policy 5.6 sets a target to generate 25% of heat and power by local decentralised energy systems and establishes a hierarchy of connecting to an existing heating and cooling network.
- 9.140 Intend to Publish London Plan Policy SI2 adds Be Seen to the Mayor's energy hierarchy. It sets a target for all development to achieve net zero carbon, by reducing CO2 emissions by a minimum of 35% on-site, of which at least 10% should be achieved through energy efficiency measures for residential development (or 15% for commercial development) and calls on boroughs to establish an offset fund (with justifying text referring to a £95/tonne cost of carbon). Intend to Publish London Plan Policy SI3 calls for major development in Heat Network Priority Areas to have a communal low-temperature heating system, with the heat source selected from a hierarchy of options (with connecting to a local existing or planned heat network at the top).
- 9.141 Local Plan Policy DMD Policy 51 calls for energy efficient buildings as the first step in applying the energy hierarchy, DPD Policy 52 requires connection to a decentralised energy network where possible, DMD Policy 53 requires the use of zero carbon green technologies and DMD Policy 54 requires financial contributions to off-set carbon where specific targets are not met. The Council published the Enfield Climate Action Plan in July 2020.

Carbon emission reductions and offsetting:

- 9.142 An Energy Strategy has been submitted which demonstrates significant CO2 emissions saving can be made through three stages of energy analysis. The first stage, The first step addresses reduction in energy demand, through the adoption of passive and active design measures.
- 9.143 The proposed energy efficiency measures include levels of insulation above Building Regulation requirements, air tightness, efficient lighting as well as energy saving controls for space conditioning and lighting.
- 9.144 At the 'Be Lean' stage, the proposed development meets the GLA target of 10% (16.3%) regulated CO2 emission reductions for the residential portion of the scheme, and a 15% (23.6%) reduction for the non residential portion of the scheme producing a site wide reduction of 17.3%.
- 9.145 The second stage considered a connection to a heating network local to the proposed development. The application site is located in an area where district heating is not expected to be implemented in the future. Alternatively a site-wide heat network is therefore proposed; this will comprise a single energy centre supplied by communal Air Source Heat Pumps and high efficiency gas boilers. However, based on the strategy Proposed, no savings are made at this "Be Clean" stage.
- 9.146 The final stage considered the incorporation of renewable energy to reduce CO2 emissions for the development. The renewable technologies feasibility study carried out for the development identified air source heat pumps and roof mounted photovoltaic panels as suitable technologies for the development.
- 9.147 The incorporation of renewable technologies at the "Be Green" stage will reduce CO2 emissions by a further 30.4% for the residential portion of the

scheme and 22.4% for the non-residential portion of the scheme producing a site wide reduction of 29.3%.

- 9.148 Altogether this would result in cumulative on site CO2 savings of 46.7% for the residential element and 46% for the non residential parts. The carbon neutral shortfall will be addressed via Carbon Offset Contributions Payments, secured by legal agreement.

Biodiversity

- 9.149 The NPPF (Para. 170) requires planning decisions to protect and enhance sites of biodiversity value, providing net gains for biodiversity and establishing resilient ecological networks.
- 9.150 London Plan Policy 7.19 makes clear that whenever possible development should make a positive contribution to the protection, enhancement, creation and management of biodiversity. Intend to Publish London Plan Policy GG2, G6 and G14 require development to protect and enhance designated nature conservation sites and local spaces, secure net biodiversity gains where possible and incorporate urban greening.
- 9.151 Core Policy 36 requires development to protect, enhance, restore or add to existing biodiversity including green spaces and corridors. DMD Policy 78 makes clear that development that has a direct or indirect negative impact upon important ecological assets will only be permitted where the harm cannot reasonably be avoided, and it has been demonstrated that appropriate mitigation can address the harm caused.

Trees

- 9.152 Tree planting will be key to the function and success of the design of the open space. The use of a variety of trees and other soft landscaping in the open spaces both at ground and deck level will create pleasant spaces that are new to this locality that will create texture and shade and contribute to the local ecology.

Ecology:

- 9.153 The applicant has submitted an ecological appraisal of the proposed development based on surveys undertaken across the development site. The report concludes that the site is of low ecological value with only low potential to support roosting bats and nesting birds. The potential to support all other protected species was considered to be negligible. With no bats recorded in a survey in September 2018. Should planning permission be granted it is officers recommended that a further bat survey be secured by condition prior to demolition in order to reconfirm the presence/likely absence of bats within the buildings. Other than checking flat roof areas for nesting birds there were no further ecological constraints on the proposals.
- 9.154 Ecological enhancement measures recommended by the report include the use of biodiverse roofs in suitable areas, vertical greening and the installation of bat and bird boxes across the site in order to achieve net biodiversity gains at the site.
- 9.155 Officers recommended that the submission of an Ecological Management Plan to secure the details and implementation of these enhancements is secured by planning condition.

Waste management

- 9.156 The NPPF refers to the importance of waste management and resource efficiency as an environmental objective. London Plan Policies 5.17 and 5.18 and Intend to Publish London Plan Policy SI7 encourages waste minimisation and waste prevention through the reuse of materials and using fewer resources. Intend to Publish London Plan Policy SI7 also requires referable schemes to promote circular economy outcomes and aim to achieve net zero-waste.
- 9.157 Local Plan Core Policy 22 encourages the inclusion of re-used and recycled materials and encourage on-site re-use and recycling of construction, demolition and excavation waste while Local Plan Policy DMD 57 sets out detailed criteria and standards. The Council has also prepared Waste and Recycling Storage Planning Guidance.
- 9.158 The applicant provided a Refuse Strategy in the Design and Access Statement. The strategy shows a refuse storage area associated with each core storage area being able to be serviced off street by a refuse vehicle. Refuse vehicles will be located within the required 20 metres distance of each refuse store in accordance with the Manual for Streets guidance.

Contaminated land

- 9.159 London Plan Policy 5.21 and Intend to Publish London Plan Policy D11 require appropriate measures to ensure that development on previously contaminated land does not activate or spread contamination. Local Plan Core Strategy Policies 32 and DMD 66 include similar objectives.
- 9.160 The application is accompanied by a contamination report which identifies ground contamination that poses risks to human health and controlled waters. The report concludes that remediation is required and a remediation strategy has been provided. The Council's Environmental Health Officer recommends a condition that secures the implementation of this remediation strategy together with a contamination condition that would stop work on the site should any new contamination not previously identified be discovered.
- 9.161 The issue raised by an objector with regard to fly tipping that has occurred on the site is not a planning matter. However, it is considered that the combination of conditions recommended by the Environmental Health Officer are sufficient to deal with any additional materials that may have been tipped o the site.

Air quality / noise

- 9.162 The NPPF (Para. 103) recognises that development proposals which promote sustainable means of travel can have a direct positive benefit on air quality and public health by reducing congestion and emissions.
- 9.163 London Plan Policies 3.2, 5.3 and 7.14 and Intend to Publish London Plan Policy SI1state that development should (a) not lead to further deterioration of existing poor air quality; (b) not create new areas that exceed limits or delay the date at which compliance will be achieved; (c) not create unacceptable risk of high levels of exposure to poor air quality and (d) be at least air quality neutral. The Mayor of London's Control of Dust and Emissions during Construction and Demolition SPG (2014) sets out relevant guidance
- 9.164 Local Plan Core Policy 32 seeks to improve air quality by reducing pollutant emissions and public exposure to pollution while Local Plan Policy DMD 65 requires development to have no adverse impact on air quality and states an ambition that improvements should be sought, where possible.

- 9.165 The Acoustic Report for the scheme has also been reviewed by the Environmental Health Officer who finds the report shows that there will be mechanical plant for the residential properties and, as at this stage the plant specification is unknown, a suitable planning condition should be applied to ensure the Council's noise requirements will be met including details of the noise attenuation of the proposed glazing. The whole of London is a low emission zone for non-road mobile machinery and an appropriate condition is also called for to address this.
- 9.166 Accordingly, Environmental Health does not object to the application for planning permission as there is unlikely to be a negative environmental impact. In particular there are no concerns regarding air quality or noise.
- 9.167 The GLA has asked the design of the scheme be considered in respect of the potential for the new residential units to have a negative impact upon the viability of uses within the nearby Strategic Industrial Land particularly in respect of the noise that may emanate from the SIL adversely affecting the living conditions of the new residents.
- 9.168 Sound measurements have been taken from nearby noisy sources in the consideration of the detailed design of the building facades, this includes from the nearby roads, the adjacent railway and the Strategic Industrial Land to the east of the site. Due to the elevated noise levels, the specification of the external building fabric on the facades facing greater noise has been adjusted accordingly. This has involved noise attenuation through enhanced glazing to the bedrooms together with mechanical ventilation for acoustic reasons.
- 9.169 The details of these measures will be submitted to and approved in writing by the Council under the conditions requested by the Environmental Health Officer.

10. Section 106 (S106) Obligations

10.1 The following matters will need to be secured by s106 legal agreement:

Affordable Housing	Amount, tenure and mix to be secured
Green Street / Enstone Road enhancement / Transport related works	Secure enhancement to the public realm along the Green Street and Enstone Road frontage including new parking provision and access driveway crossing and related highway works to be discussed with officers.
Car Club membership	Secure a commitment to offer for a period of three years, a three year membership to the local car club scheme per residential unit, subject to a car club being operational in the local area.
Car Club space	Provision of a car club space to Green Street / Enstone Road
Travel Plan	Travel Plan implementation on occupation of dwellings and business centre

Carbon offset contribution	Secure carbon offset contribution
Education	Financial contribution towards local education facilities
Management company	Secure the appointment of Managing Agents to operate a management company
Loss of Employment	Contribution payable in line with Chapter 13 of Enfield's S106 Supplementary Planning Document.
Local Employment	Measures to maximise opportunities for local business and for residents to gain employment at the site.
Local Health Services	Financial contribution towards local health facilities : £68,100 (<i>to be updated</i>)
Monitoring fee	Payment of the Council's costs associated with monitoring of the S106 agreement (TBC)
Council's legal costs	Payment of the Council's legal costs associated with the preparation and completion of the S106 agreement

Community Infrastructure Levy (CIL)

- 9.77 As of April 2010, legislation in the form of CIL Regulations 2010 (as amended) came into force which would allow 'charging authorities' in England and Wales to apportion a levy on net additional floorspace for certain types of qualifying development to enable the funding of a wide range of infrastructure that is needed as a result of development.
9. Both Enfield CIL and Mayor of London CIL2 would be payable on this scheme to support the development of appropriate infrastructure.

10. Conclusion

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



- Notes:**
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 9. Where MLA services on a project do not include for site inspections and work surveys, MLA do not warrant that 'as built' issue drawings are a complete and accurate record of what has been built.

KEY
 PLANNING APPLICATION BOUNDARY

B: 02-10-2020 Flex. commercial unit changed to single storey.
 A: 10-09-2020 Cycle stores amended, Sheffield stands shown
 Revisions:

PLANNING

Client:

STONEGATE HOMES

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Original Sheet Size **A0**

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Date:	Scale:	Drawn by:
Oct-20	1:100 @ A0	BM
Project:		
BRIMSDOWN, EN3 7SJ 241 GREEN STREET		
Drawing title:		
PROPOSED GROUND FLOOR PLAN		
Reference:	Dwg. No.:	Rev.:
GSB	100	B



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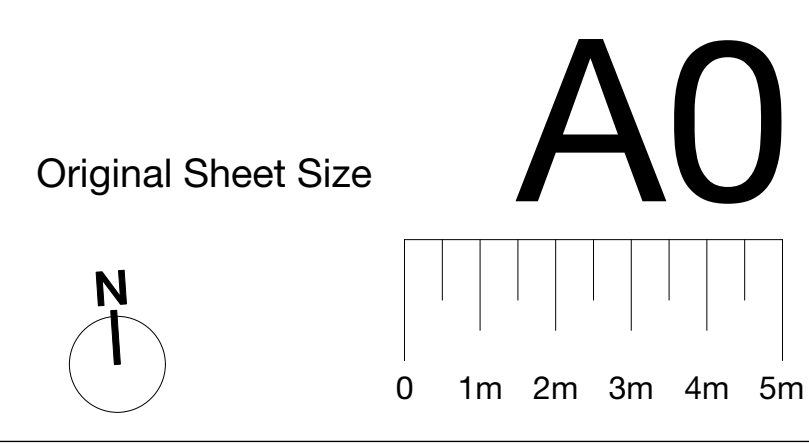
KEY
 PLANNING APPLICATION BOUNDARY

A: 02-10-2020 Block A 1st floor changed to residential. Flexible commercial unit C size amended.
 Revisions:

PLANNING



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Date: Oct-20 Scale: 1:100 @ A0 Drawn by: BM

Project: BRIMSDOWN, EN3 7SJ
 241 GREEN STREET

Drawing title:
**PROPOSED
 1ST FLOOR PLAN**

Reference: GSB Dwg. No: 101 Rev: A



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KEY
 PLANNING APPLICATION BOUNDARY

KEY - FLAT TYPE

- 1B2P FLAT
- 2B3P FLAT
- 2B4P FLAT
- 3B5P FLAT

Revisions:

PLANNING

Client:

STONEGATE HOMES

MatthewLloydArchitects LLP

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 www.matthewlloyd.co.uk

Original Sheet Size **A0**

N

0 1m 2m 3m 4m 5m

Date:	Scale:	Drawn by:
Jun-20	1:100 @ A0	BM
Project:		
BRIMSDOWN, EN3 7SJ 241 GREEN STREET		
Drawing title:		
PROPOSED 2ND FLOOR PLAN		
Reference:	Dwg. No.:	Rev.:
GSB	102	-



- Notes:**
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KEY
 PLANNING APPLICATION BOUNDARY

- KEY - FLAT TYPE**
- 1B2P FLAT
 - 2B3P FLAT
 - 2B4P FLAT
 - 3B5P FLAT

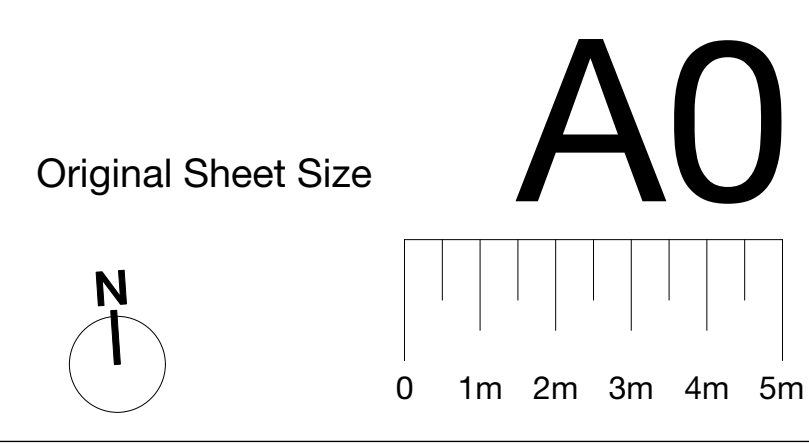
A: 02-10-2020 4th floor revised. Refer to drawing GSB 104.
 Revisions:



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Project:		
BRIMSDOWN, EN3 7SJ 241 GREEN STREET		
Drawing title:		
PROPOSED 3RD FLOOR PLAN		
Reference:	Dwg. No.:	Rev.:
GSB	103	A



- Notes:**
1. Do not scale from this drawing.
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KEY
 PLANNING APPLICATION BOUNDARY

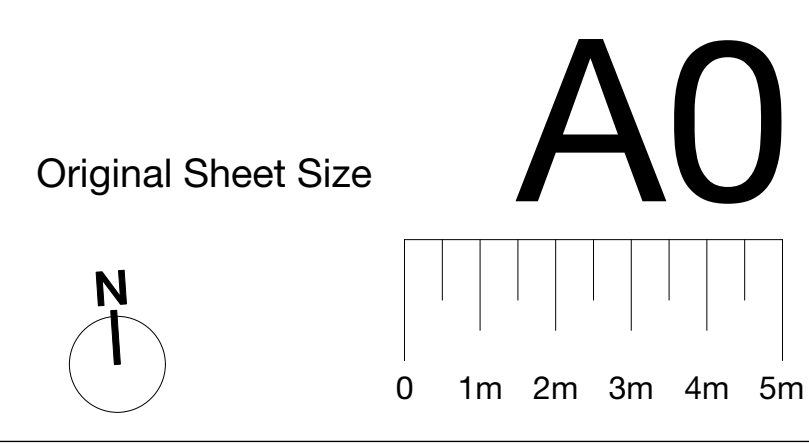
KEY - FLAT TYPE

- 1B2P FLAT
- 2B3P FLAT
- 2B4P FLAT
- 3B5P FLAT

A 02-10-2020 Block A 5th floor dropped to 4th floor.
 Revisions:



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Oct-20	1:100 @ A0	BM
Project:		
BRIMSDOWN, EN3 7SJ 241 GREEN STREET		
Drawing title:		
PROPOSED 4TH FLOOR PLAN		
Reference:	Dwg. No.:	Rev.:
GSB	104	A



- Notes:**
1. Do not scale from this drawing.
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KEY
 PLANNING APPLICATION BOUNDARY

KEY - FLAT TYPE

- 1B2P FLAT
- 2B3P FLAT
- 2B4P FLAT
- 3B5P FLAT

A 02-10-2020 Block A roof dropped to 5th floor.
 Revisions:

PLANNING

Client:

STONEGATE HOMES

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0 1m 2m 3m 4m 5m

Date:	Scale:	Drawn by:
Oct-20	1:100 @ A0	BM
Project:		
BRIMSDOWN, EN3 7SJ 241 GREEN STREET		
Drawing title:		
PROPOSED 5TH FLOOR PLAN		
Reference:	Dwg. No.:	Rev.:
GSB	105	-



Notes:

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KEY

— PLANNING APPLICATION BOUNDARY

KEY - FLAT TYPE

- 1B2P FLAT
- 2B3P FLAT
- 2B4P FLAT
- 3B5P FLAT

A: 02-10-2020 Flat types amended in Block B.
Revisions:

PLANNING



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Project:
**BRIMSDOWN, EN3 7SJ
241 GREEN STREET**

Drawing title:
**PROPOSED
6TH - 7TH FLOOR PLAN**

Reference:	Dwg. No.:	Rev.:
GSB	106	A



- Notes:**
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KEY
 PLANNING APPLICATION BOUNDARY

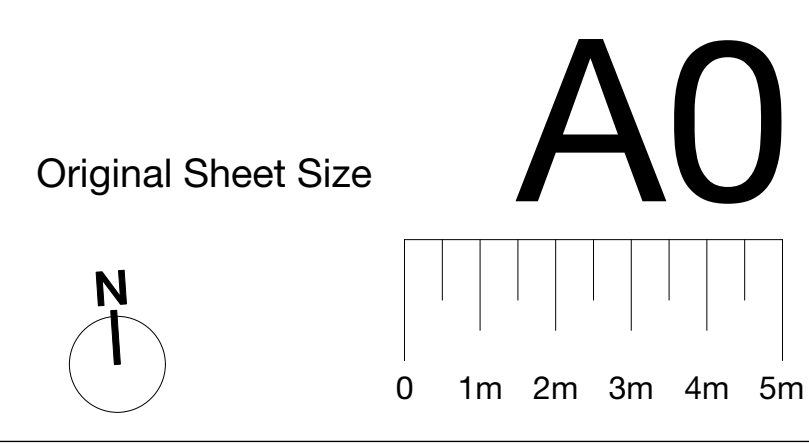
KEY - FLAT TYPE

- 1B2P FLAT
- 2B3P FLAT
- 2B4P FLAT
- 3B5P FLAT

Revisions:



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Oct-20	1:100 @ A0	BM
Project:		
BRIMSDOWN, EN3 7SJ 241 GREEN STREET		
Drawing title:		
PROPOSED 8TH FLOOR PLAN		
Reference:	Dwg. No.:	Rev.:
GSB	108	-



- Notes:**
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 2. All dimensions to be verified prior to the commencement of any work or the production of any shop drawings.
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KEY
 PLANNING APPLICATION BOUNDARY

KEY - FLAT TYPE

- 1B2P FLAT
- 2B3P FLAT
- 2B4P FLAT
- 3B5P FLAT

A 02-10-2020 10th floor revised. Refer to drawing GSB 110.
 Revisions:

PLANNING

Client:

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Date:	Scale:	Drawn by:
Oct-20	1:100 @ A0	BM
Project:		
BRIMSDOWN, EN3 7SJ 241 GREEN STREET		
Drawing title:		
PROPOSED 9TH FLOOR PLAN		
Reference:	Dwg. No.:	Rev.:
GSB	109	A



- Notes:**
1. Do not scale from this drawing.
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KEY
 PLANNING APPLICATION BOUNDARY

KEY - FLAT TYPE

- 1B2P FLAT
- 2B3P FLAT
- 2B4P FLAT
- 3B5P FLAT

A 02-10-2020 Block C 10th floor revised.
 Revisions:

PLANNING

Client:

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HOMES

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Oct-20	1:100 @ A0	BM
Project:		
BRIMSDOWN, EN3 7SJ 241 GREEN STREET		
Drawing title:		
PROPOSED 10TH FLOOR PLAN		
Reference:	Dwg. No.:	Rev.:
GSB	110	A



- Notes:**
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KEY - FLAT TYPE

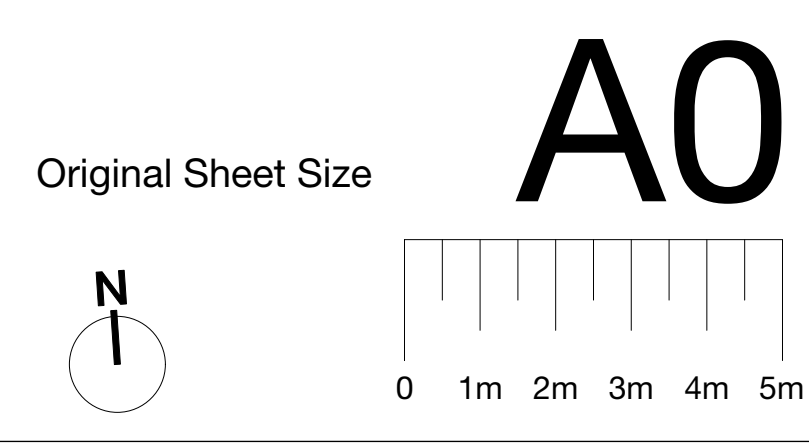
- 1B2P FLAT
- 2B3P FLAT
- 2B4P FLAT
- 3B5P FLAT

A 02-10-2020 Block B & C 11th floor revised.
 Revisions:

PLANNING



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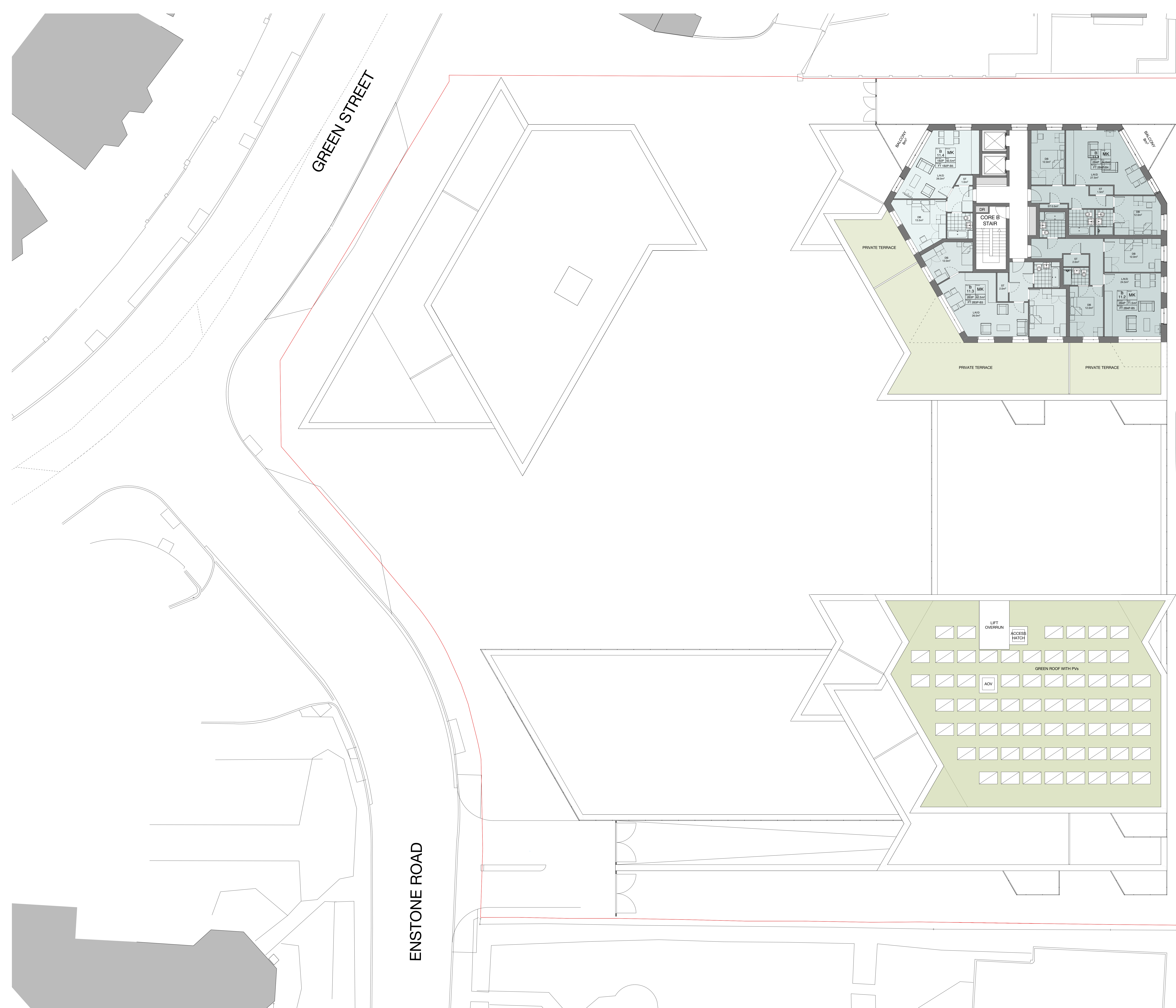


Date:	Scale:	Drawn by:
Oct-20	1:100 @ A0	BM

Project:
BRIMSDOWN, EN3 7SJ
241 GREEN STREET

Drawing title:
PROPOSED
11TH FLOOR PLAN

Reference:	Dwg. No.:	Rev.:
GSB	111	A



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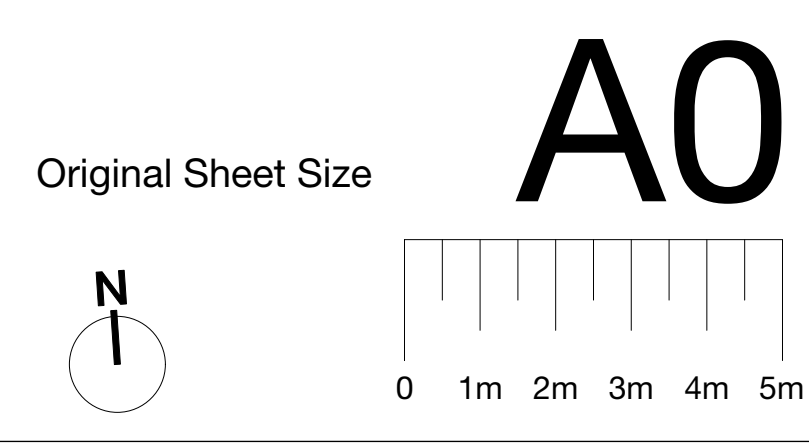
- 1B2P FLAT
- 2B3P FLAT
- 2B4P FLAT
- 3B5P FLAT

A: 02-10-2020 Block B floor revised, Block C roof dropped to 12th floor. Refer to GSB 113 for 13th floor.
 Revisions:

PLANNING



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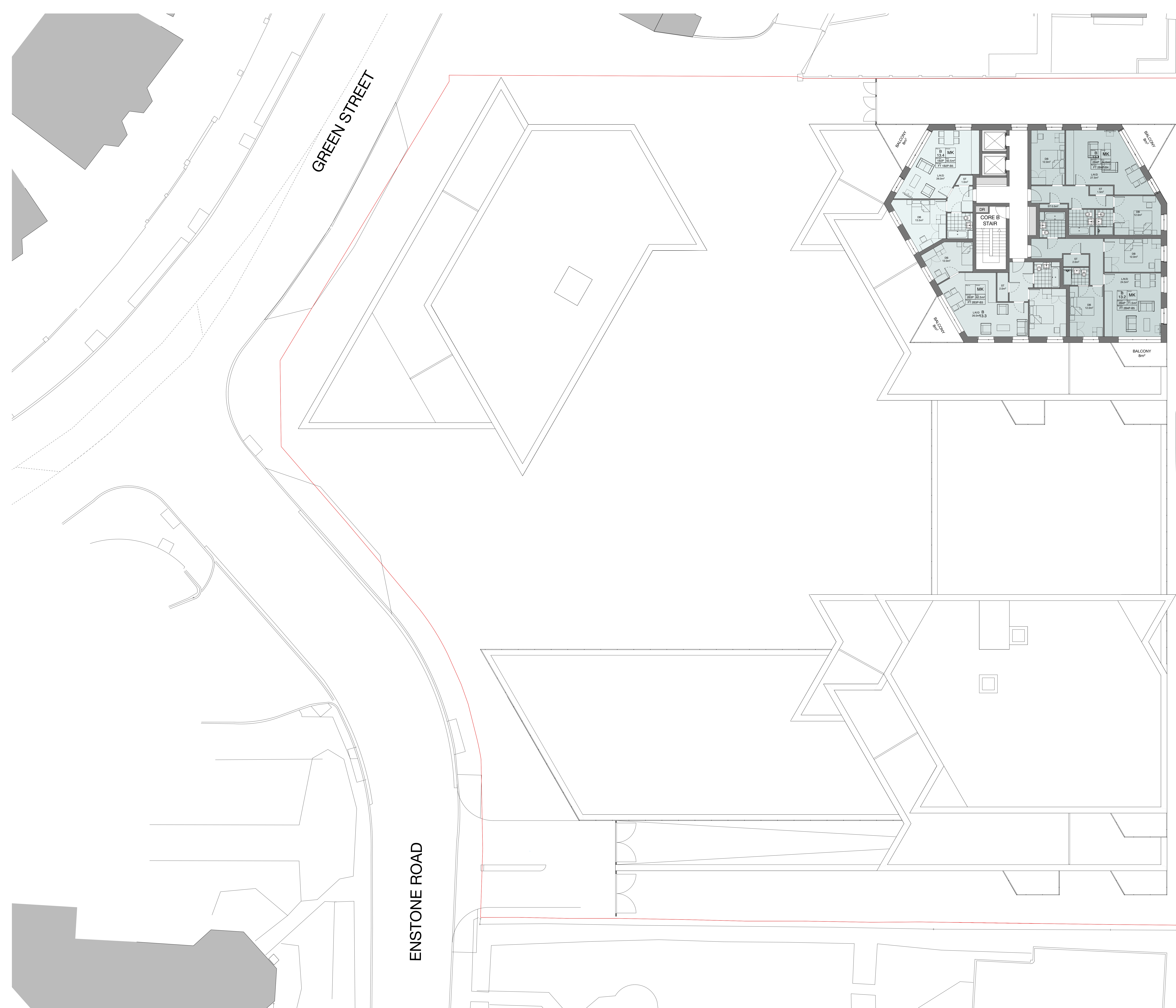


Date: Oct-20 Scale: 1:100 @ A0 Drawn by: BM

Project: BRIMSDOWN, EN3 7SJ
 241 GREEN STREET

Drawing title:
**PROPOSED
 12TH FLOOR PLAN**

Reference: GSB Dwg. No: 112 Rev: A



- Notes:**
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KEY - FLAT TYPE

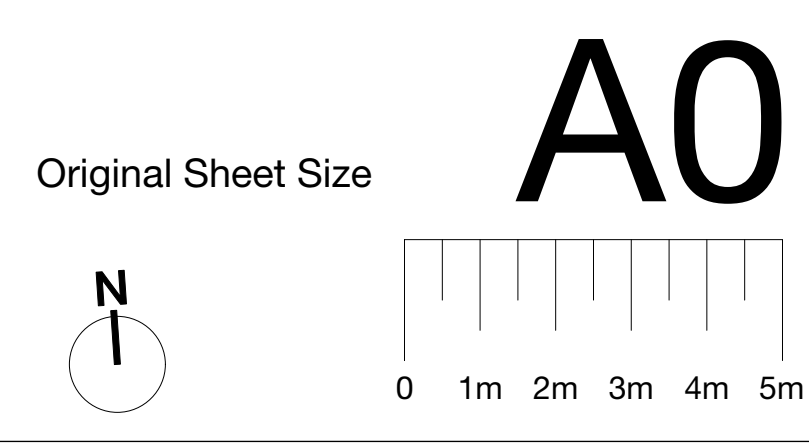
- 1B2P FLAT
- 2B3P FLAT
- 2B4P FLAT
- 3B5P FLAT

A: 02-10-2020 Block B floor revised, Block C roof dropped to 12th floor. Refer to GSB 113 for 13th floor.
 Revisions:

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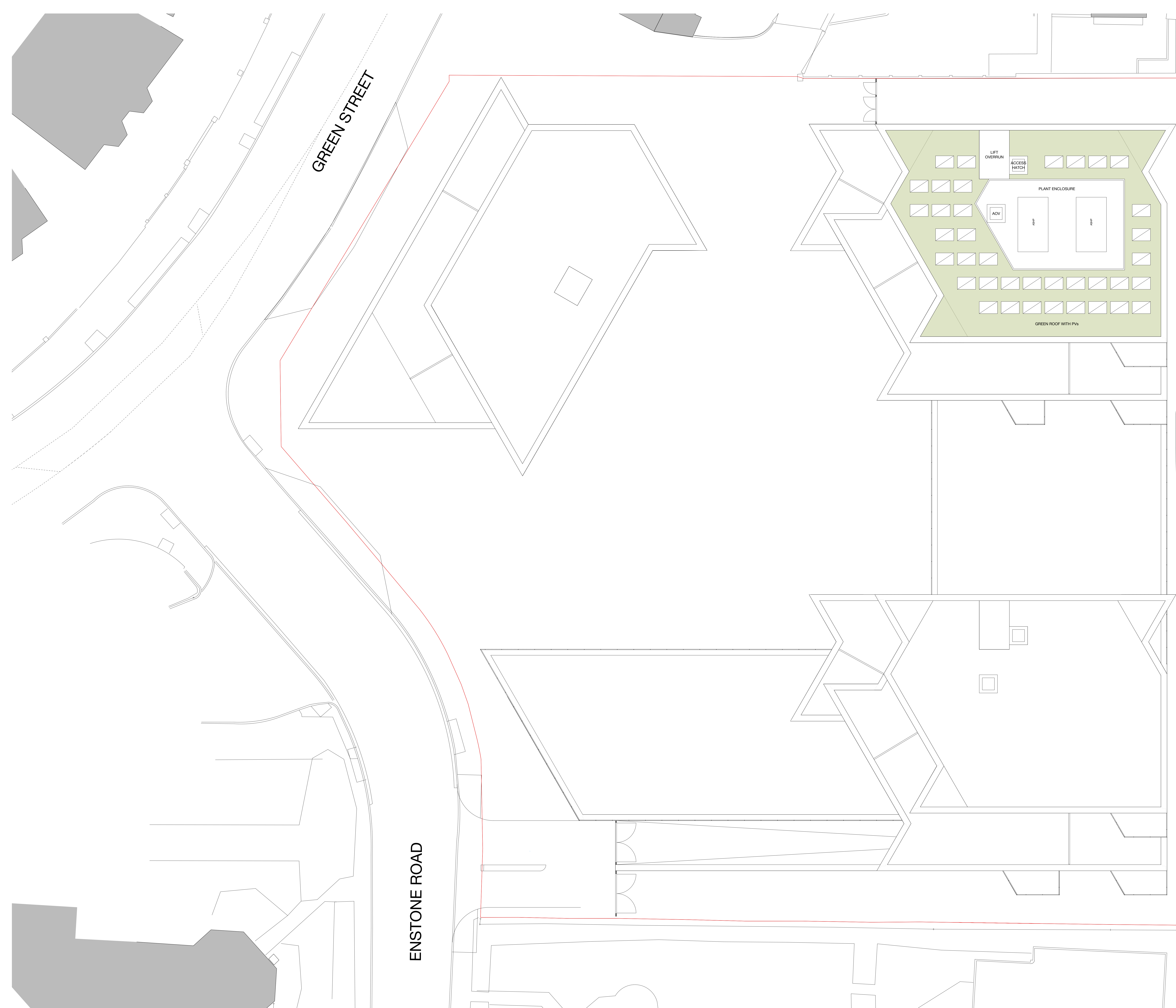


Date:	Scale:	Drawn by:
Oct-20	1:100 @ A0	BM

Project:
BRIMSDOWN, EN3 7SJ
241 GREEN STREET

Drawing title:
PROPOSED
13TH - 15TH FLOOR PLAN

Reference:	Dwg. No.:	Rev.:
GSB	113	A



Notes:

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KEY

- PLANNING APPLICATION BOUNDARY

Revisions:

PLANNING

Client:



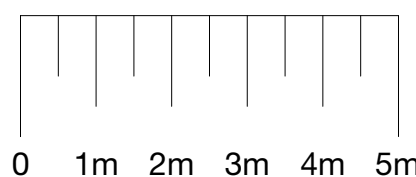
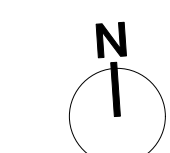
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Project:
BRIMSDOWN, EN3 7SJ
241 GREEN STREET

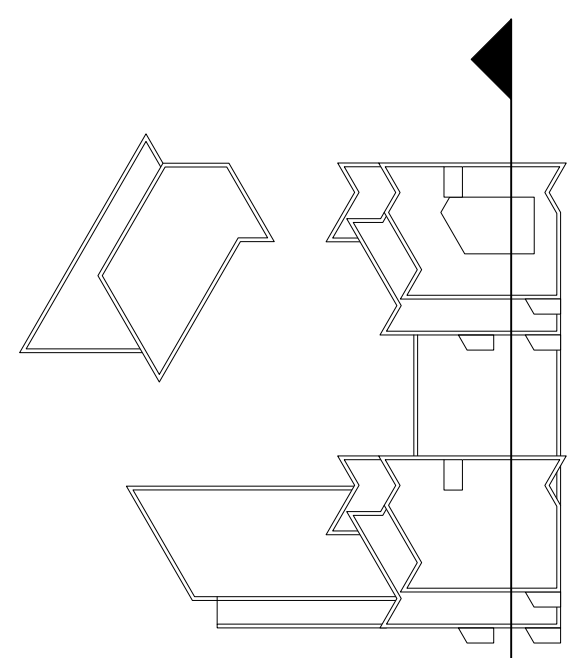
Drawing title:
**PROPOSED
ROOF PLAN**

Reference:	Dwg. No.:	Rev.:
GSB	116	-

Notes:

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KEY



MATERIAL KEY

- BRICK TYPE 1:** MIXED PINK RED TEXTURED BRICK
- BRICK TYPE 2:** MIXED WHITE PINK TEXTURED BRICK
- A1** STRETCHER BOND - BT 1
- A2** STRETCHER BOND - BT 2
- B1** ALTERNATING RECESSED STRETCHER BOND - BT 1
- C1** BT 1 - SOLDIER COURSE / STACK BOND (RECESSED ABOVE WINDOWS)
- C2** BT 2 - SOLDIER COURSE / STACK BOND (RECESSED ABOVE WINDOWS)
- D** STRIPED BRICKWORK BETWEEN WINDOWS (1 COURSE BT 2, 2 COURSES BT 1)
- E** STRIPED BRICKWORK BETWEEN WINDOWS (2 COURSES BT 2, 1 COURSE BT 1)
- F** DARK BRONZE PPC COMPOSITE WINDOW (RAL COLOUR TBC AT DETAIL STAGE)
- G** DARK BRONZE PPC ALUMINIUM CURTAIN WALL (RAL COLOUR TBC AT DETAIL STAGE)
- H** DARK BRONZE PPC ALUMINIUM LOUVERED PANEL (RAL COLOUR TBC AT DETAIL STAGE)
- J** DARK BRONZE PPC ALUMINIUM PERFORATED PANEL (RAL COLOUR TBC AT DETAIL STAGE)
- K** LOUVERED PLANT ENCLOSURE
- L1** DARK BRONZE STEEL BALUSTRADE ON MATCHING PPC FASCIA PANEL & STEELWORK
- L2** DARK BRONZE PPC STEEL JULIET BALUSTRADE
- M** PPC ALUMINIUM COPING (RAL COLOUR TBC AT DETAIL STAGE)
- N** ROLLER SHUTTER TO CAR PARK (RAL COLOUR TBC AT DETAIL STAGE)
- O** CLIMBING PLANTS

A: 16-10-2020 Building heights & material key revised.
Revisions:

PLANNING



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Date:	Scale:	Drawn by:
Oct-20	1:100 @ A0	BM
Project:		
BRIMSDOWN, EN3 7SJ 241 GREEN STREET		
Drawing title:		
PROPOSED SECTION A		
Reference:	Dwg. No:	Rev.
GSB	201	A



ANEMONE COURT

BLOCK B

CAR PARK

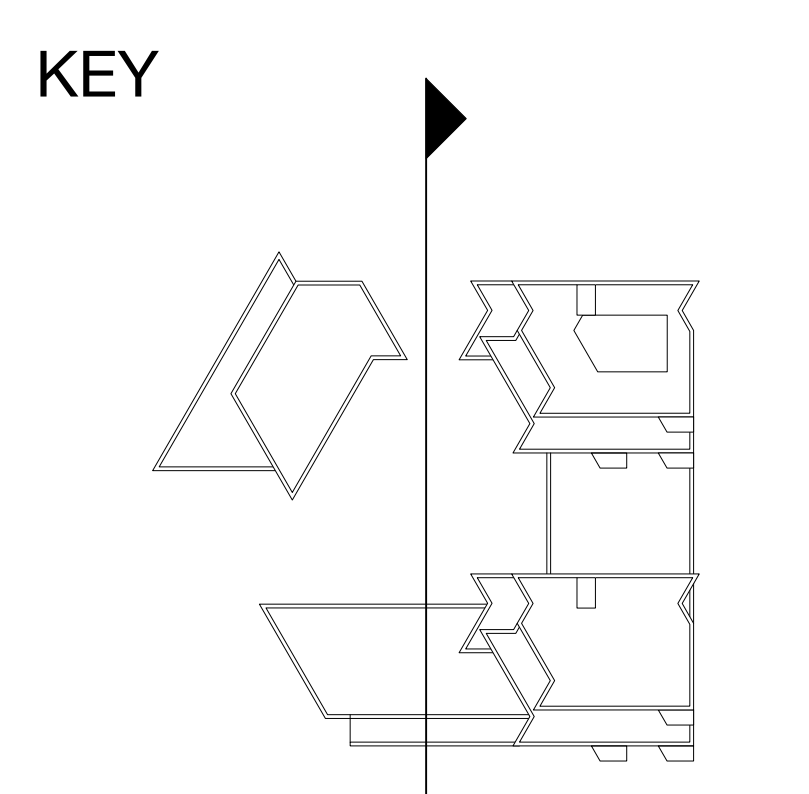
BLOCK C

LANGLEY COURT



LANGLEY COURT FLEXIBLE COMMERCIAL UNIT B BLOCK B BLOCK C FLEXIBLE COMMERCIAL UNIT C CAR PARK RAMP ANEMONE COURT

- Notes:**
1. Do not scale from this drawing.
 2. All dimensions to be verified prior to the commencement of any work or the production of any shop drawings.
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- MATERIAL KEY**
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 - BRICK TYPE 2:** MIXED WHITE PINK TEXTURED BRICK
 - A1:** STRETCHER BOND - BT 1
 - A2:** STRETCHER BOND - BT 2
 - B1:** ALTERNATING RECESSED STRETCHER BOND - BT 1
 - C1:** BT 1 - SOLDIER COURSE / STACK BOND (RECESSED ABOVE WINDOWS)
 - C2:** BT 2 - SOLDIER COURSE / STACK BOND (RECESSED ABOVE WINDOWS)
 - D:** STRIPED BRICKWORK BETWEEN WINDOWS (1 COURSE BT 2, 2 COURSES BT 1)
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 - F:** DARK BRONZE PPC COMPOSITE WINDOW (RAL COLOUR TBC AT DETAIL STAGE)
 - G:** DARK BRONZE PPC ALUMINIUM CURTAIN WALL (RAL COLOUR TBC AT DETAIL STAGE)
 - H:** DARK BRONZE PPC ALUMINIUM LOUVERED PANEL (RAL COLOUR TBC AT DETAIL STAGE)
 - J:** DARK BRONZE PPC ALUMINIUM PERFORATED PANEL (RAL COLOUR TBC AT DETAIL STAGE)
 - K:** LOUVERED PLANT ENCLOSURE
 - L1:** DARK BRONZE STEEL BALUSTRADE ON MATCHING PPC FASCIA PANEL & STEELWORK
 - L2:** DARK BRONZE PPC STEEL JULIET BALUSTRADE
 - M:** PPC ALUMINIUM COPING (RAL COLOUR TBC AT DETAIL STAGE)
 - N:** ROLLER SHUTTER TO CAR PARK (RAL COLOUR TBC AT DETAIL STAGE)
 - O:** CLIMBING PLANTS
- A: 16-10-2020 Building heights & material key revised.
Revisions:

PLANNING

Client:

STONEGATE HOMES

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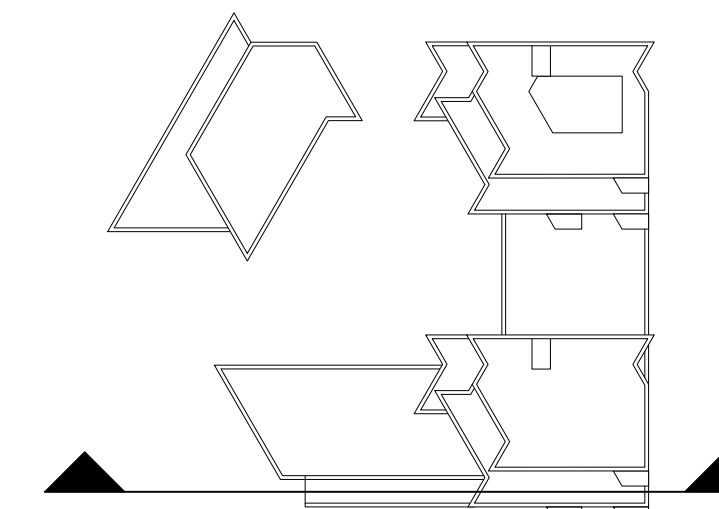
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Project:		
BRIMSDOWN, EN3 7SJ 241 GREEN STREET		
Drawing title:		
PROPOSED SECTION B		
Reference:	Dwg. No:	Rev.
GSB	202	A

Notes:

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KEY



MATERIAL KEY

- BRICK TYPE 1:** MIXED PINK RED TEXTURED BRICK
- BRICK TYPE 2:** MIXED WHITE PINK TEXTURED BRICK
- A1** STRETCHER BOND - BT 1
- A2** STRETCHER BOND - BT 2
- B1** ALTERNATING RECESSED STRETCHER BOND - BT 1
- C1** BT 1 - SOLDIER COURSE / STACK BOND (RECESSED ABOVE WINDOWS)
- C2** BT 2 - SOLDIER COURSE / STACK BOND (RECESSED ABOVE WINDOWS)
- D** STRIPED BRICKWORK BETWEEN WINDOWS (1 COURSE BT 2, 2 COURSES BT 1)
- E** STRIPED BRICKWORK BETWEEN WINDOWS (2 COURSES BT 2, 1 COURSE BT 1)
- F** DARK BRONZE PPC COMPOSITE WINDOW (RAL COLOUR TBC AT DETAIL STAGE)
- G** DARK BRONZE PPC ALUMINIUM CURTAIN WALL (RAL COLOUR TBC AT DETAIL STAGE)
- H** DARK BRONZE PPC ALUMINIUM LOUVERED PANEL (RAL COLOUR TBC AT DETAIL STAGE)
- J** DARK BRONZE PPC ALUMINIUM PERFORATED PANEL (RAL COLOUR TBC AT DETAIL STAGE)
- K** LOUVRED PLANT ENCLOSURE
- L1** DARK BRONZE STEEL BALUSTRADE ON MATCHING PPC FASCIA PANEL & STEELWORK
- L2** DARK BRONZE PPC STEEL JULIET BALUSTRADE
- M** PPC ALUMINIUM COPING (RAL COLOUR TBC AT DETAIL STAGE)
- N** ROLLER SHUTTER TO CAR PARK (RAL COLOUR TBC AT DETAIL STAGE)
- O** CLIMBING PLANTS

A: 16-10-2020 Building heights & material key revised.
Revisions:

PLANNING



MatthewLloydArchitects LLP

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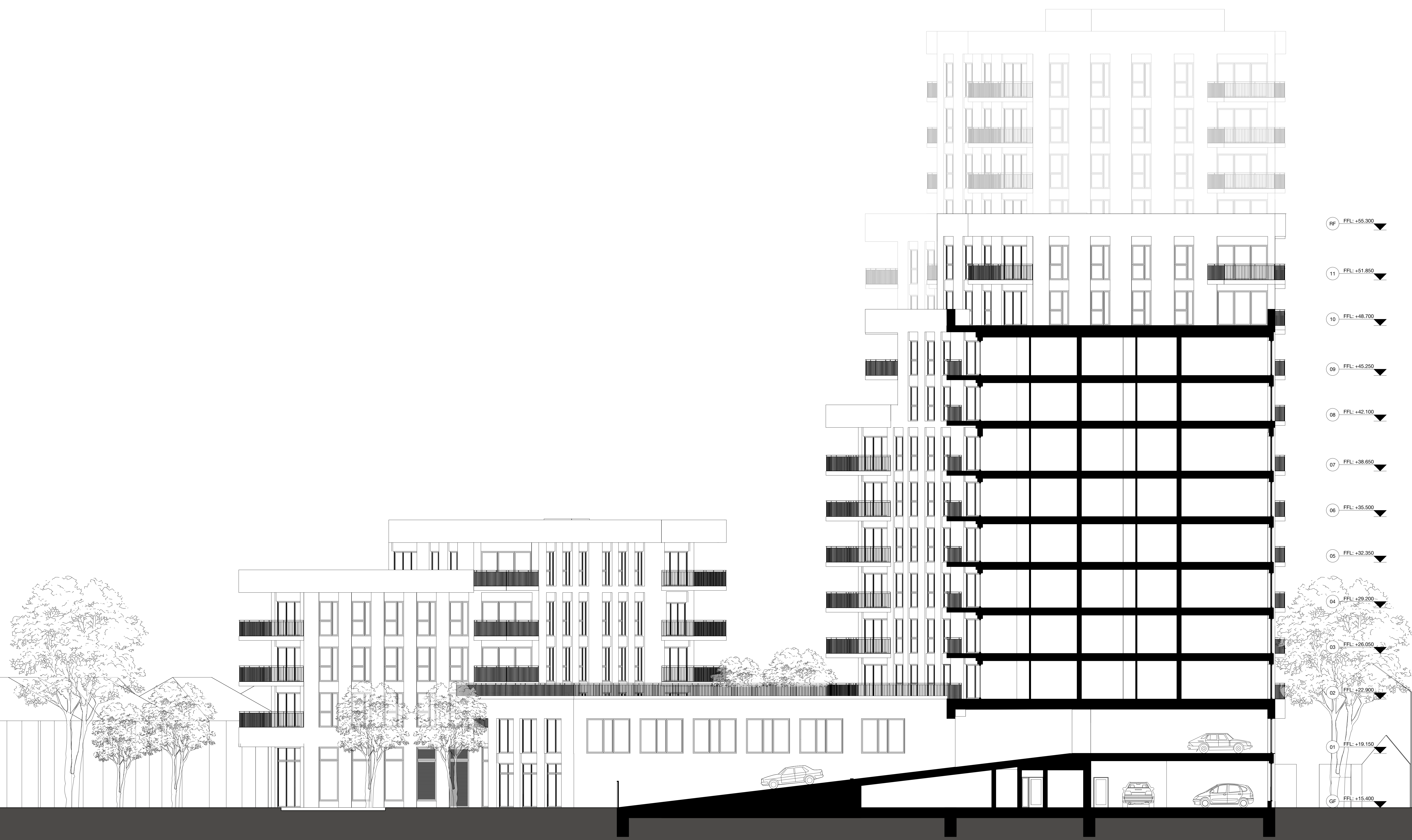
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Project:
BRIMSDOWN, EN3 7SJ
241 GREEN STREET

Drawing title:
PROPOSED SECTION C

Reference:	Dwg. No.:	Rev.:
GSB	203	A

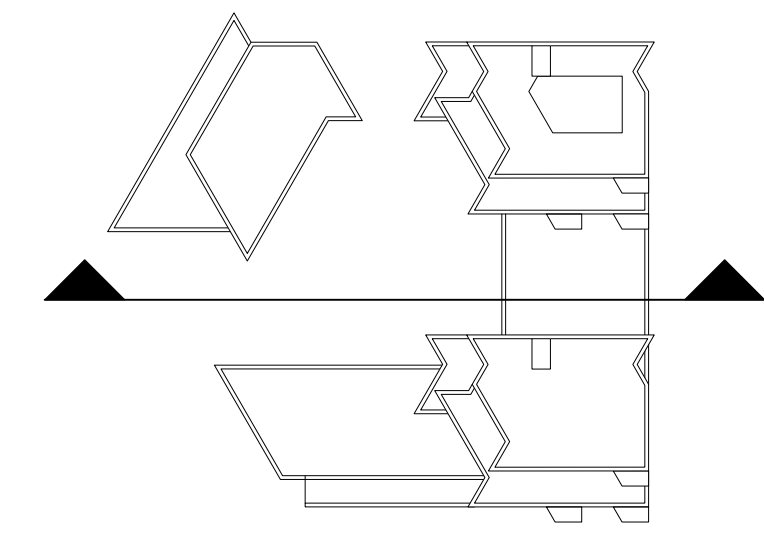


BUS STOP ENSTONE ROAD BLOCK A FLEXIBLE COMMERCIAL UNIT C CAR PARK RAMP BLOCK C

Notes:

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- L1** DARK BRONZE STEEL BALUSTRADE ON MATCHING PPC FASCIA PANEL & STEELWORK
- L2** DARK BRONZE PPC STEEL JULIET BALUSTRADE
- M** PPC ALUMINIUM COPING (RAL COLOUR TBC AT DETAIL STAGE)
- N** ROLLER SHUTTER TO CAR PARK (RAL COLOUR TBC AT DETAIL STAGE)
- O** CLIMBING PLANTS

A: 16-10-2020 Building heights & material key revised.
Revisions:

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Date:	Scale:	Drawn by:
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Project:
BRIMSDOWN, EN3 7SJ
241 GREEN STREET

Drawing title:
PROPOSED
SECTION D

Reference:	Dwg. No.:	Rev.:
GSB	204	A

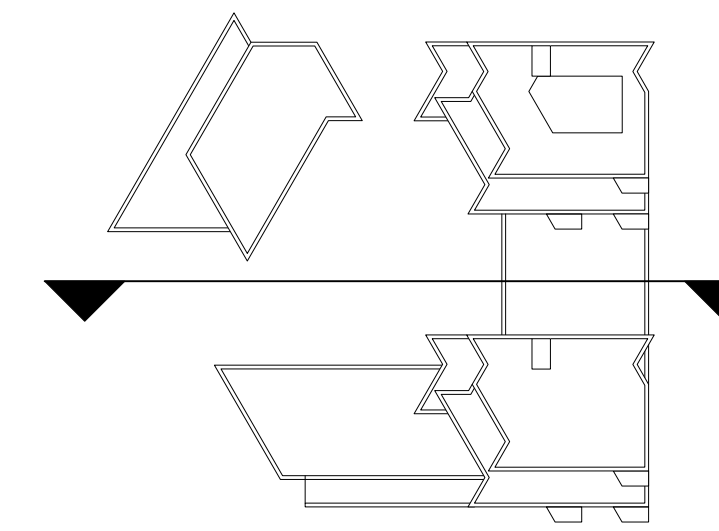


BUS STOP ENSTONE ROAD BLOCK A COURTYARD BLOCK B BLOCK C CAR PARK

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- N** ROLLER SHUTTER TO CAR PARK (RAL COLOUR TBC AT DETAIL STAGE)
- O** CLIMBING PLANTS

A 16-10-2020 Building heights & material key revised.
Revisions:

PLANNING

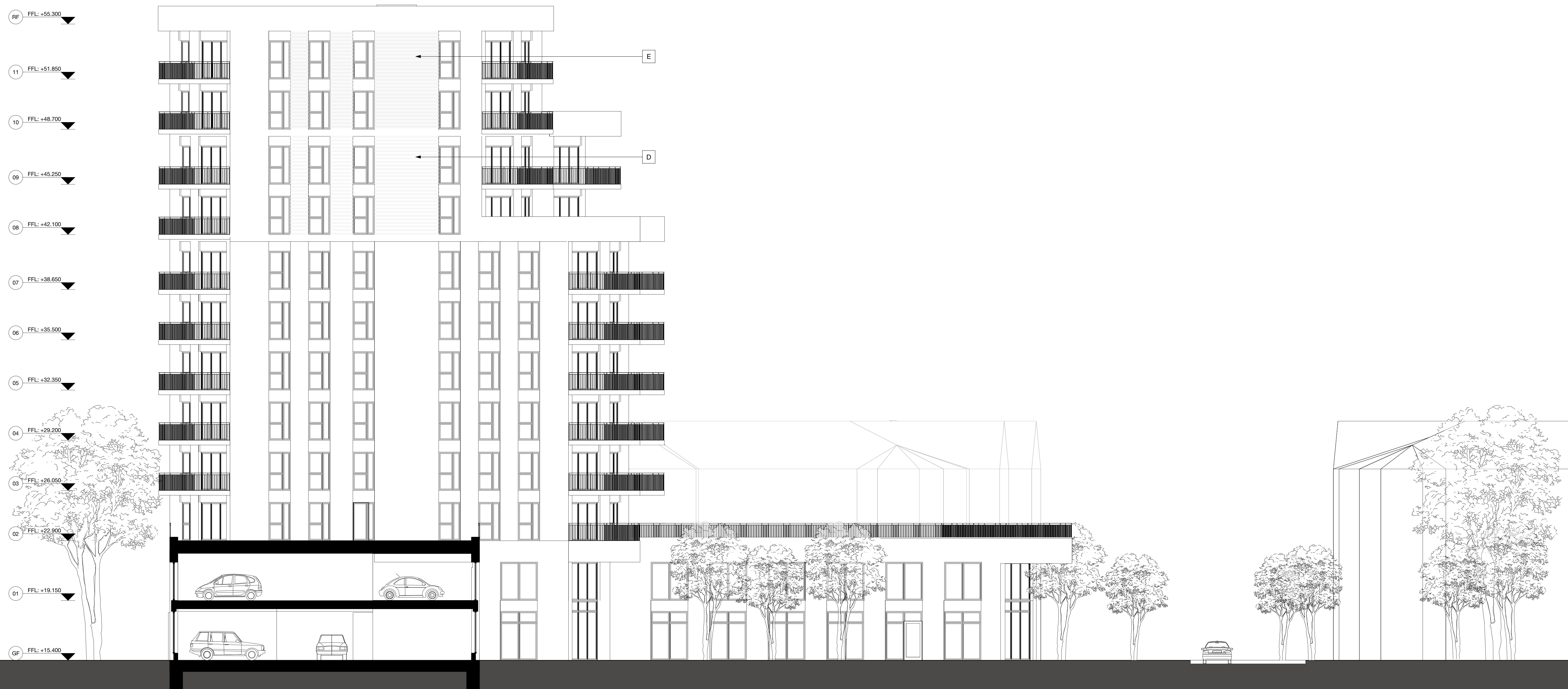


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Project:		
BRIMSDOWN, EN3 7SJ 241 GREEN STREET		
Drawing title:		
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Reference:	Dwg. No:	Rev.
GSB	205	A

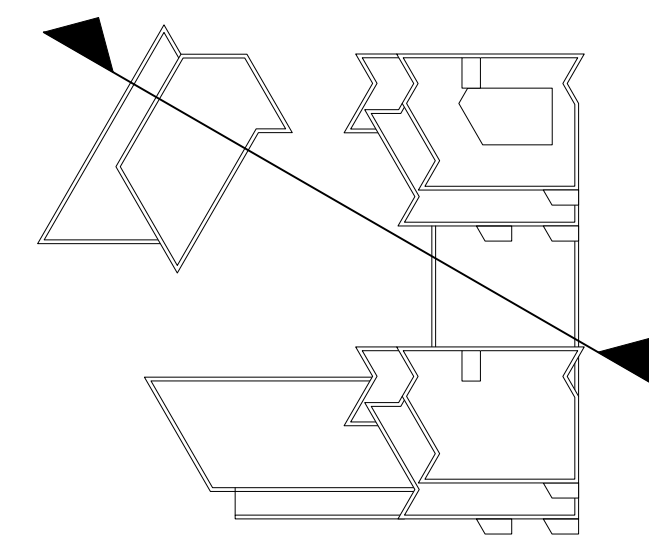


RAILWAY CAR PARK BLOCK C FLEXIBLE COMMERCIAL UNIT C ENSTONE ROAD

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- H** DARK BRONZE PPC ALUMINIUM LOUVERED PANEL (RAL COLOUR TBC AT DETAIL STAGE)
- J** DARK BRONZE PPC ALUMINIUM PERFORATED PANEL (RAL COLOUR TBC AT DETAIL STAGE)
- K** LOUVERED PLANT ENCLOSURE
- L1** DARK BRONZE STEEL BALUSTRADE ON MATCHING PPC FASCIA PANEL & STEELWORK
- L2** DARK BRONZE PPC STEEL JULIET BALUSTRADE
- M** PPC ALUMINIUM COPING (RAL COLOUR TBC AT DETAIL STAGE)
- N** ROLLER SHUTTER TO CAR PARK (RAL COLOUR TBC AT DETAIL STAGE)
- O** CLIMBING PLANTS

A: 16-10-2020 Building heights & material key revised.
Revisions:

PLANNING

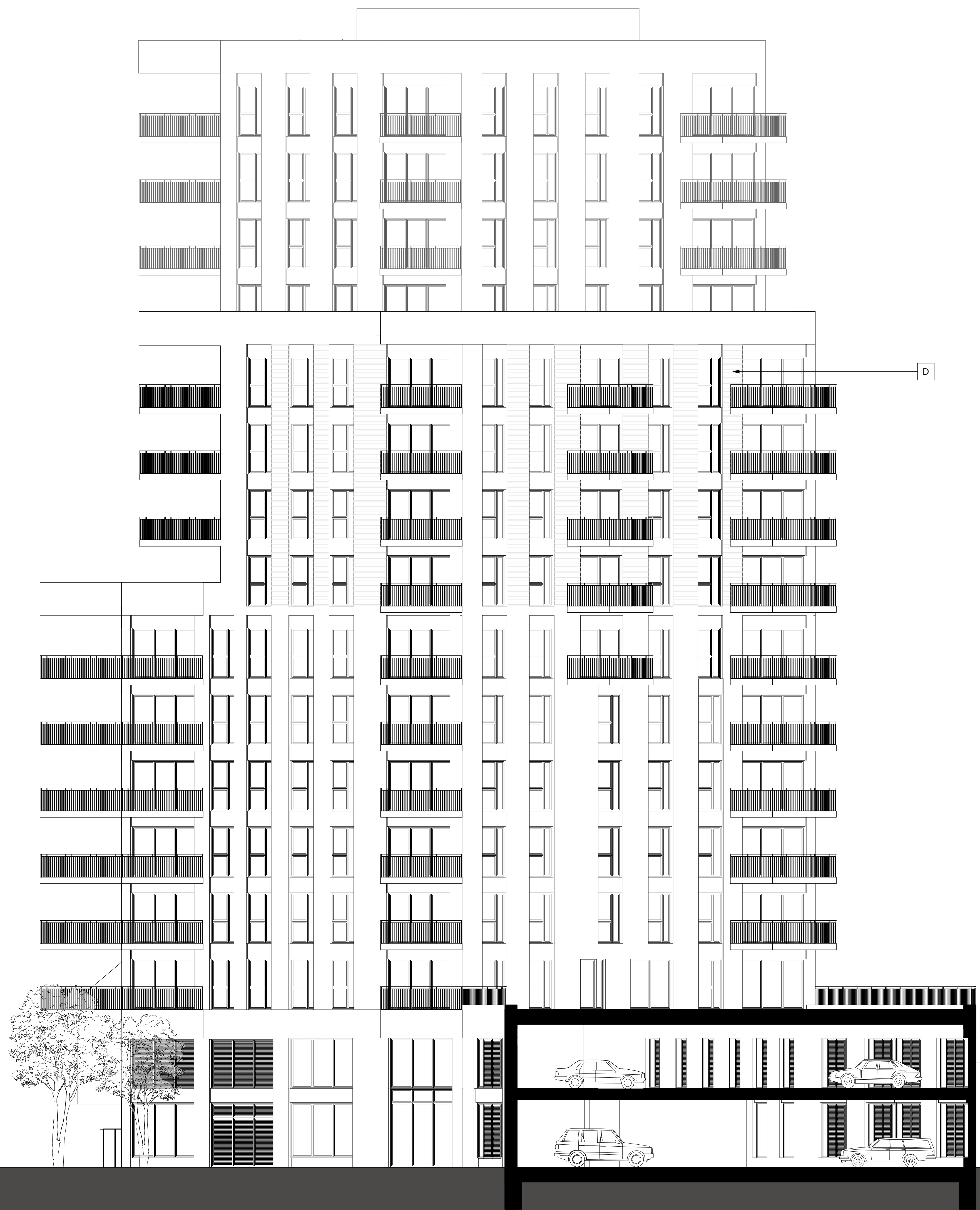


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Project:		
BRIMSDOWN, EN3 7SJ 241 GREEN STREET		
Drawing title:		
PROPOSED SECTION F		
Reference:	Dwg. No.:	Rev.:
GSB	206	A



- RF FFL: +34.150
- 04 FFL: +30.700
- 03 FFL: +27.225
- 02 FFL: +24.100
- 01 FFL: +20.950
- GF FFL: +15.400

GREEN STREET

BLOCK A

COURTYARD

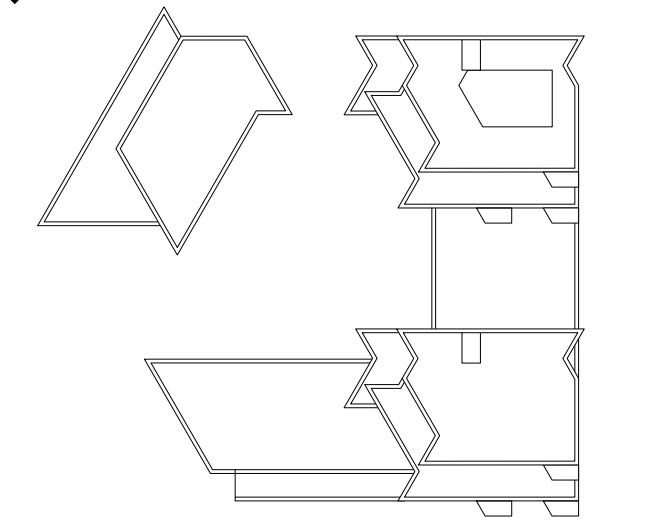
BLOCK B

CAR PARK

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A: 16-10-2020 Building heights & material key revised.
Revisions:

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Project:
BRIMSDOWN, EN3 7SJ
241 GREEN STREET

Drawing title:
PROPOSED
NORTH ELEVATION

Reference:	Dwg. No:	Rev.
GSB	251	A

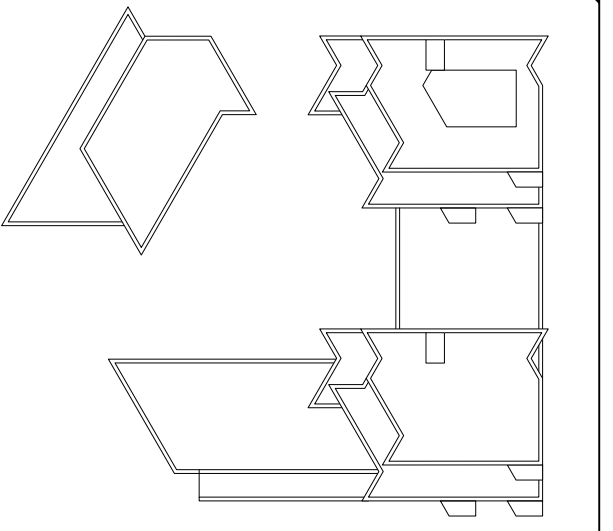


RAILWAY BLOCK B BLOCK A GREEN STREET

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- O:** CLIMBING PLANTS

A 16-10-2020 Heights and brick detailing amended
Revisions:

PLANNING



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BRIMSDOWN, EN3 7SJ 241 GREEN STREET		
Drawing title:		
PROPOSED EAST ELEVATION		
Reference:	Dwg. No.:	Rev.:
GSB	252	A



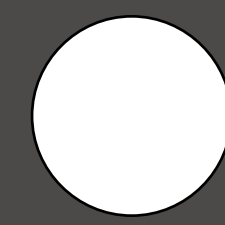
ANEMONE COURT

BLOCK C

CAR PARK

BLOCK B

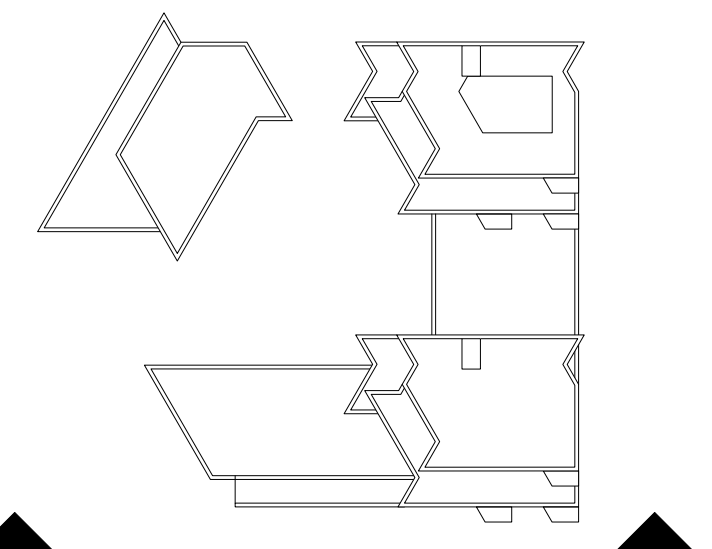
LANGLEY COURT



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A 16-10-2020 Building heights & material key revised.
Revisions:

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Drawing title:		
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Reference:	Dwg. No.:	Rev.:
GSB	253	A



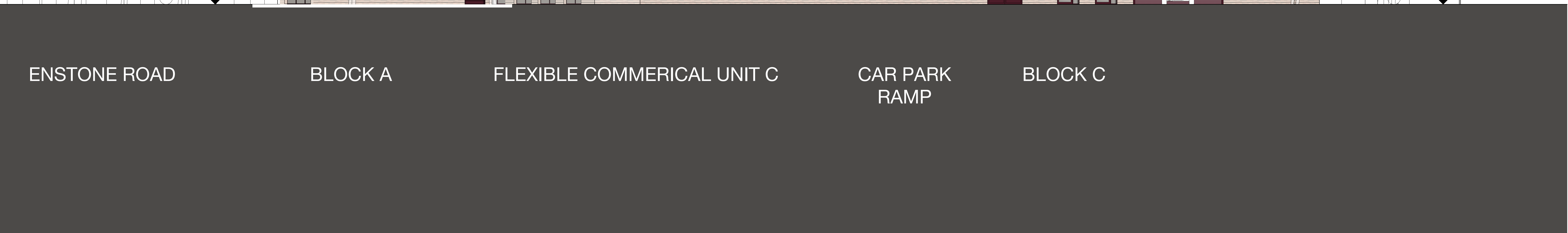
ENSTONE ROAD

BLOCK A

FLEXIBLE COMMERCIAL UNIT C

CAR PARK RAMP

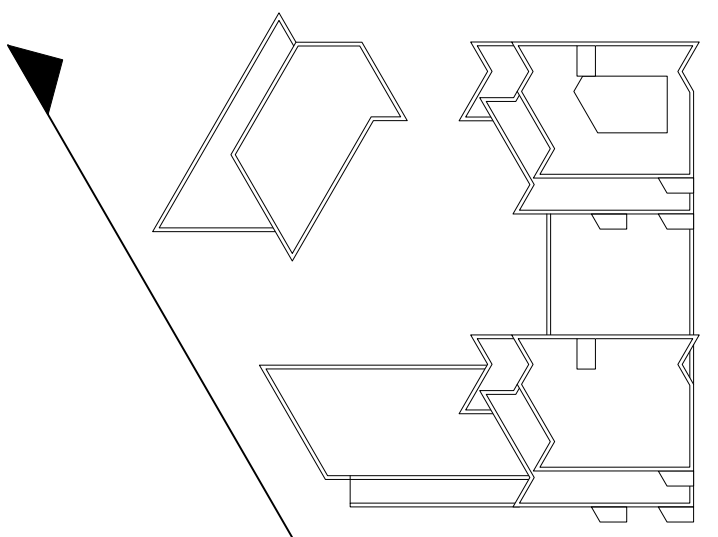
BLOCK C



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- L1** DARK BRONZE STEEL BALUSTRADE ON MATCHING PPC FASCIA PANEL & STEELWORK
- L2** DARK BRONZE PPC STEEL JULIET BALUSTRADE
- M** PPC ALUMINIUM COPING (RAL COLOUR TBC AT DETAIL STAGE)
- N** ROLLER SHUTTER TO CAR PARK (RAL COLOUR TBC AT DETAIL STAGE)
- O** CLIMBING PLANTS

A: 16-10-2020 Building heights & material key revised.
Revisions:

PLANNING

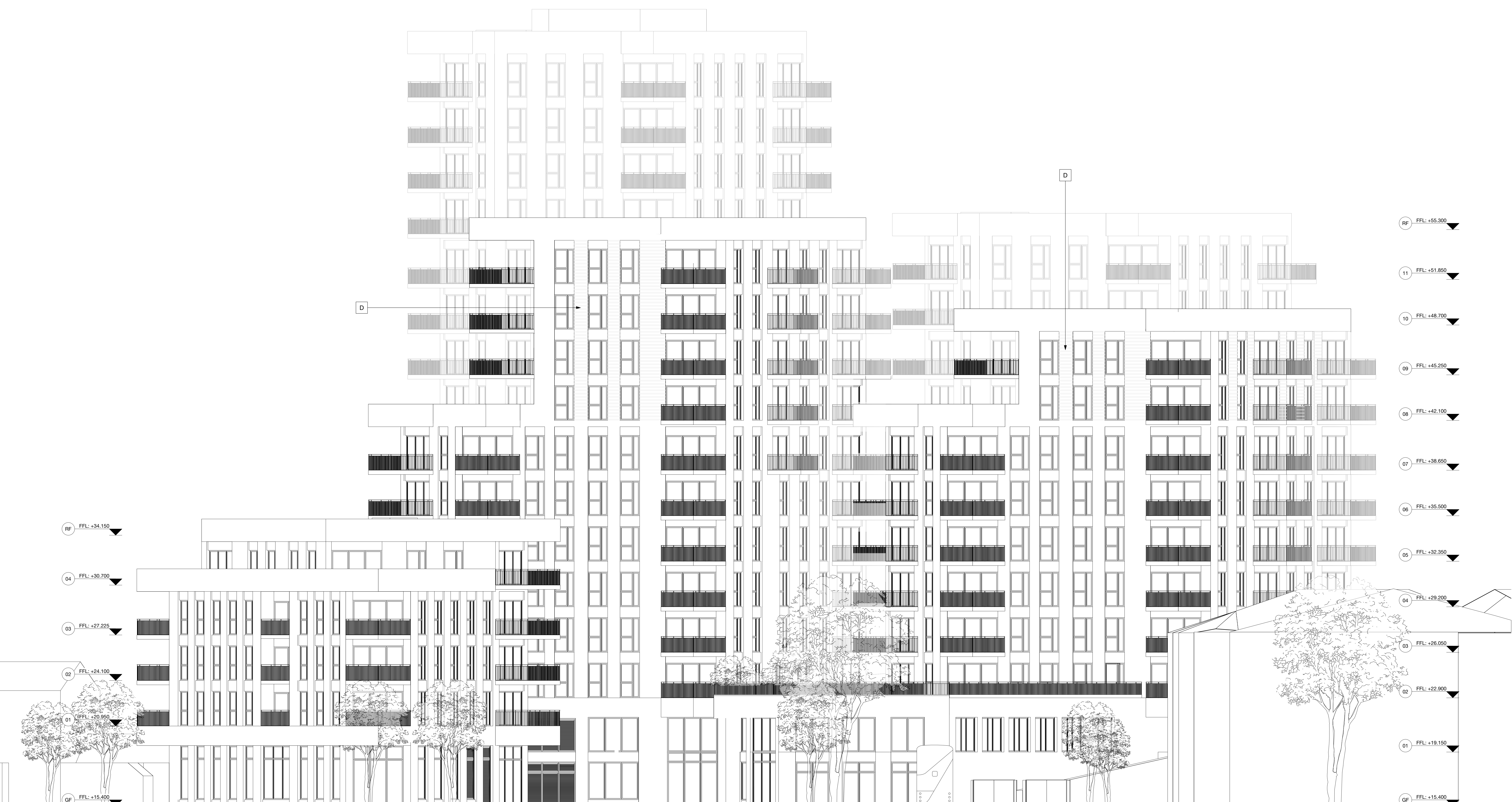


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Date:	Scale:	Drawn by:
Oct-20	1:100 @ A0	BM
Project:		
BRIMSDOWN, EN3 7SJ 241 GREEN STREET		
Drawing title:		
PROPOSED SOUTHWEST ELEVATION		
Reference:	Dep. No.:	Rev.:
GSB	254	A



GREEN STREET

BLOCK A

BLOCK B

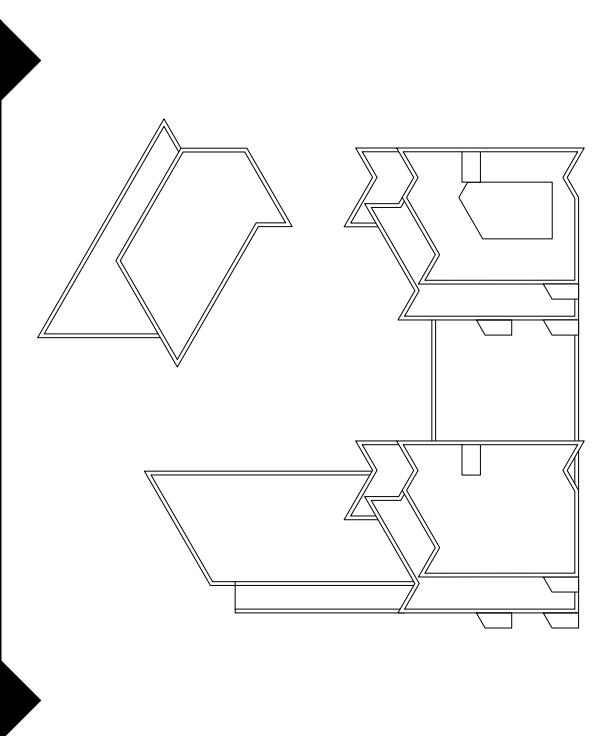
BLOCK C

BUS STOP

Notes:

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KEY



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- C2** BT 2 - SOLDIER COURSE / STACK BOND (RECESSED ABOVE WINDOWS)
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Project:		
BRIMSDOWN, EN3 7SJ 241 GREEN STREET		
Drawing title:		
PROPOSED WEST ELEVATION		
Reference:	Dwg. No.:	Rev.:
GSB	255	A

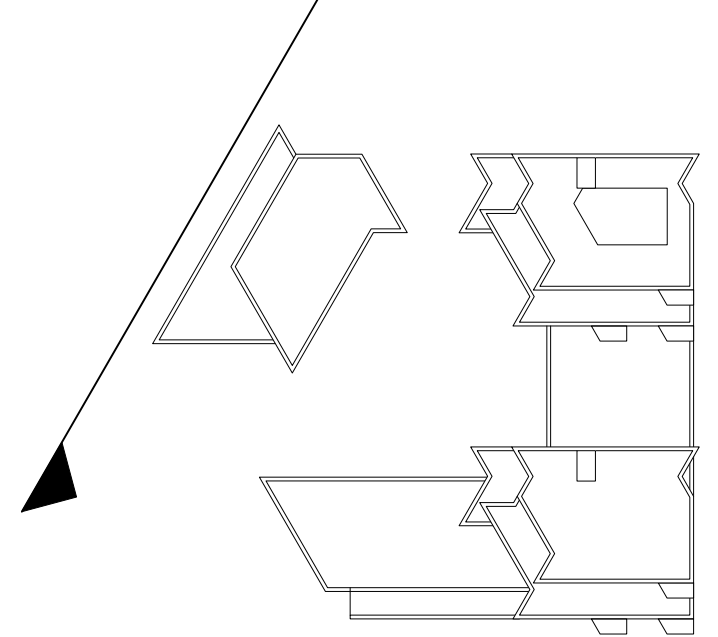


FLEXIBLE COMMERCIAL UNIT A BLOCK A BLOCK C FLEXIBLE COMMERCIAL UNIT C CAR PARK RAMP

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Date:	Scale:	Drawn by:
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Project:
BRIMSDOWN, EN3 7SJ
241 GREEN STREET

Drawing title:
PROPOSED
NORTHWEST STREET ELEVATION

Reference:	Dwg. No.:	Rev.:
GSB	256	A



BLOCK B

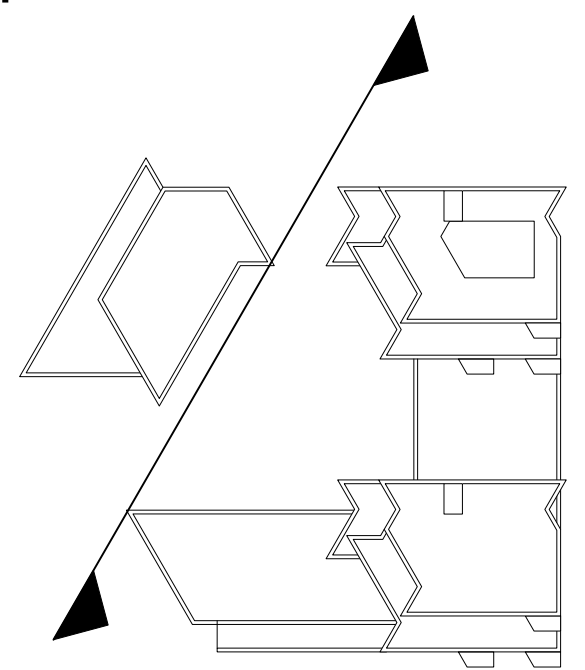
BLOCK A

BLOCK C

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Project:		
BRIMSDOWN, EN3 7SJ 241 GREEN STREET		
Drawing title:		
PROPOSED NORTHWEST COURTYARD ELEVATION		
Reference:	Dwg. No:	Rev.
GSB	257	A



FLEX. COMMERCIAL
UNIT B

BLOCK B

COURTYARD

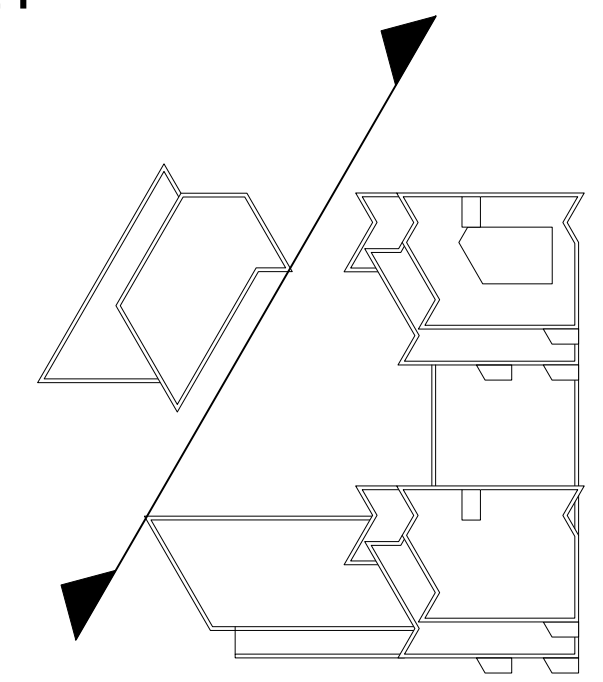
BLOCK C

FLEX. COMMERCIAL
UNIT C

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 Revisions:

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Oct-20	1:100 @ A0	BM
Project:		
BRIMSDOWN, EN3 7SJ 241 GREEN STREET		
Drawing title:		
PROPOSED SOUTHWEST COURTYARD ELEVATION		
Reference:	Dwg. No.:	Rev.:
GSB	258	A



BUS STOP

ENSTONE ROAD

BLOCK A

COURTYARD

WHOLE SCHEME OVERVIEW
 Based on Plan Set of 02-10-2020

General Notes

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2. The areas shown are subject to change according to site surveys, further design development, planning and construction.
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UNITS OVERVIEW

	TOTAL	%	SUM %
FLATS			
STUDIO	-	-	-
1B2P	54	36.5%	36.5%
2B3P	11	7.4%	48.0%
2B4P	60	40.5%	
3B4P	-	-	
3B5P	23	15.5%	15.5%
3B6P	-	-	
TOTAL UNITS	148		

UNITS BY TENURE

MARKET			INTERMEDIATE			AFFORDABLE RENT		
TOTAL	%	SUM %	TOTAL	%	SUM %	TOTAL	%	SUM %
-	-	-	-	-	-	-	-	-
28	37.3%	37.3%	15	55.6%	55.6%	11	23.9%	23.9%
6	8.0%	48.0%	4	14.8%	44.4%	1	2.2%	50.0%
30	40.0%		8	29.6%		22	47.8%	
-	-		-	-		-	-	
11	14.7%	14.7%	-	-	-	12	26.1%	26.1%
-	-		-	-		-	-	
75			27			46		

TENURE OVERVIEW

	UNITS	H/R	NIA
MARKET	75	211	5,125.0 m ²
INT	27	66	1,603.5 m ²
A/R	46	151	3,502.0 m ²
SUM AFFORDABLE	73	217	5,105.5 m²
TOTAL H/R		428	

AFFORDABLE BY HABITABLE ROOMS

REQUIREMENT		Calc. Req.	TARGET
Hab. Rooms	428 @ 50%	214.00	214
PROVISION			
Total Hab Rooms	217	51%	214
Affordable Rented	151	70%	70%
Intermediate Rented	66	30%	30%
AFFORDABLE BY HAB ROOMS		51%	
AFFORDABLE RENT BY UNIT		49%	
WHEELCHAIR ACCESSIBLE BY UNIT		12.2%	10%

AREAS OVERVIEW

RESI NIA	10,230.5 m ²
RESI GIA	13,368.5 m ²
FLEX. COMM. GIA	1,144.5 m ²
PARKING GIA	1,459.0 m ²
SHARED GIA	91.0 m ²
TOTAL GIA	16,063.0 m²

BLOCK A
RESIDENTIAL UNITS BY AREA & TENURE

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Floor	Fiat No.	1B2 A1	1B2 A2	1B2 A3	1B2 A4	2B3 A1	2B3 A2	2B4 A1	2B4 A2	2B4 A3	3B5 A1	NIA	Total H/R	MKT	INT	A/R	W/C	EAS	STO	H/R MKT	H/R INT	H/R A/R	MKT NIA	INT NIA	A/R NIA	AFF NIA	
1st Floor	A 1 1							1				73.5	3	1	0	0	0	7	2	3	0	0	73.5	0.0	0.0	0.0	
	A 1 2										1	91.5	5	1	0	0	0	8	2.5	5	0	0	91.5	0.0	0.0	0.0	
	A 1 3	1					1					50.0	2	1	0	0	0	5	1.5	2	0	0	50.0	0.0	0.0	0.0	
	A 1 4											66.0	3	1	0	0	0	6	2	3	0	0	66.0	0.0	0.0	0.0	
	A 1 5								1			76.0	3	1	0	0	0	7	2	3	0	0	76.0	0.0	0.0	0.0	
	Subtotal	1				1			2		1	357.0	16	5	0	0	0			16	0	0	357.0	0.0	0.0	0.0	
2nd Floor	A 2 1							1				73.5	3	1	0	0	0	7	2	3	0	0	73.5	0.0	0.0	0.0	
	A 2 2										1	91.5	5	1	0	0	0	8	2.5	5	0	0	91.5	0.0	0.0	0.0	
	A 2 3	1					1					50.0	2	1	0	0	0	5	1.5	2	0	0	50.0	0.0	0.0	0.0	
	A 2 4											66.0	3	1	0	0	0	6	2	3	0	0	66.0	0.0	0.0	0.0	
	A 2 5								1			76.0	3	1	0	0	0	7	2	3	0	0	76.0	0.0	0.0	0.0	
	Subtotal	1				1			2		1	357.0	16	5	0	0	0			16	0	0	357.0	0.0	0.0	0.0	
3rd Floor	A 3 1							1				73.5	3	1	0	0	0	7	2	3	0	0	73.5	0.0	0.0	0.0	
	A 3 2										1	91.5	5	1	0	0	0	8	2.5	5	0	0	91.5	0.0	0.0	0.0	
	A 3 3	1					1					50.0	2	1	0	0	0	5	1.5	2	0	0	50.0	0.0	0.0	0.0	
	A 3 4											66.0	3	1	0	0	0	6	2	3	0	0	66.0	0.0	0.0	0.0	
	A 3 5								1			76.0	3	1	0	0	0	7	2	3	0	0	76.0	0.0	0.0	0.0	
	Subtotal	1				1			2		1	357.0	16	5	0	0	0			16	0	0	357.0	0.0	0.0	0.0	
4th Floor	A 4 1									1		70.5	3	1	0	0	0	7	2	3	0	0	70.5	0.0	0.0	0.0	
	A 4 2											50.0	2	1	0	0	0	5	1.5	2	0	0	50.0	0.0	0.0	0.0	
	A 4 3	1		1								51.0	2	1	0	0	0	5	1.5	2	0	0	51.0	0.0	0.0	0.0	
	A 4 4				1							54.5	2	1	0	0	0	5	1.5	2	0	0	54.5	0.0	0.0	0.0	
		Subtotal	3	1		1				1		0	226.0	9	4	0	0	0			9	0	0	226.0	0.0	0.0	0.0
	TOTAL	6	3	7	3	3	1,297.0	57	19	0	0	0	88	57	0	0	0	0	57	0	0	1,297.0	0.0	0.0	0.0		
	UNITS	19																									
	Bedrooms												35														
	Cycle St												35														
	Refuse Bins (1280l)												1.8														
	Recycle Bins (1280l)												2.1														
	Compost Bins (1280l)												0.3														

