

LONDON BOROUGH OF ENFIELD

PLANNING COMMITTEE

Date: 05 January 2021

Report of:
Head of Planning

Contact Officer:
Andy Higham
Allison De Marco
Evie Learman

Ward:
Southgate
Green

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

Category: Major

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

PROPOSAL:

20/01188/LBC

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

20/01049/FUL

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

Applicant Name & Address:

Connected Living London (Arnos Grove)
Ltd
Citygate
St James' Boulevard
Newcastle Upon Tyne
NE1 4JE

Agent Name & Address:

Susie Byrne
Quod
7 Ingeni Building
Broadwick Street
London
W1F 0DE

RECOMMENDATION:

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

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



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Scale 1:2500

North



Drawings / Application Documents:

Air Quality Assessment March 2020

Noise and Vibration Assessment Report March 2020

Sustainability Statement March 2020

Construction Resource Management Plan March 2020

Energy Statement March 2020

Ecological Technical Note March 2020

Biodiversity Net Gain Assessment March 2020

Arboricultural Impact Assessment March 2020

Fire Statement March 2020

MLUK-721-A-P-XX-1010 Proposed Site Plan rev 01: revised September 2020

MLUK-721-A-P-XX-1030 Proposed Site Elevations & Sections

MLUK-721-A-P-XX-1031 Proposed Site Elevations & Sections rev 01: revised September 2020

MLUK-721-A-P-XX-1032 Proposed Site Elevations & Sections

MLUK-721-A-P-A0-1200 Public Square - Level 00 Proposed GA Plan

MLUK-721-A-P-A1-1210 Bldg A01 - Level 00 Proposed GA Plan

MLUK-721-A-P-A1-1211 Bldg A01 - Level 01 Proposed GA Plan rev 01: revised September 2020

MLUK-721-A-P-A1-1212 Bldg A01 - Level 02 Proposed GA Plan

MLUK-721-A-P-A1-1213 Bldg A01 - Level 03 Proposed GA Plan

MLUK-721-A-P-A1-1214 Bldg A01 - Level 04 Proposed GA Plan

MLUK-721-A-P-A1-1215 Bldg A01 - Level 05 Proposed GA Plan

MLUK-721-A-P-A2-1219 Bldg A02 - Level B1 Proposed GA Plan

MLUK-721-A-P-A2-1220 Bldg A02 - Level 00 Proposed GA Plan

MLUK-721-A-P-A2-1221 Bldg A02 - Level 01 Proposed GA Plan

MLUK-721-A-P-A2-1222 Bldg A02 - Level 02 Proposed GA Plan

MLUK-721-A-P-A2-1223 Bldg A02 - Level 03 Proposed GA Plan

MLUK-721-A-P-A2-1224 Bldg A02 - Level 04 Proposed GA Plan

MLUK-721-A-P-A2-1225 Bldg A02 - Level 05 Proposed GA Plan

MLUK-721-A-P-A2-1226 Bldg A02 - Level 06 Proposed GA Plan rev 01: revised September 2020

MLUK-721-A-P-A2-1227 Bldg A02 - Level 07 Proposed GA Plan rev 01: revised September 2020

MLUK-721-A-P-B1-1230 Bldg B01 - Level 00 Proposed GA Plan rev 01: revised September 2020

MLUK-721-A-P-B1-1231 Bldg B01 - Level 01 Proposed GA Plan

MLUK-721-A-P-B1-1232 Bldg B01 - Level 02 Proposed GA Plan

MLUK-721-A-P-B1-1233 Bldg B01 - Level 03 Proposed GA Plan

MLUK-721-A-P-B2-1239 Bldg B02 - Level B1 Proposed GA Plan

MLUK-721-A-P-B2-1240 Bldg B02 - Level 00 Proposed GA Plan

MLUK-721-A-P-B2-1241 Bldg B02 - Level 01 Proposed GA Plan

MLUK-721-A-P-B2-1242 Bldg B02 - Level 02 Proposed GA Plan

MLUK-721-A-P-B2-1243 Bldg B02 - Level 03 Proposed GA Plan

MLUK-721-A-P-B2-1244 Bldg B02 - Level 04 Proposed GA Plan

MLUK-721-A-P-A2-1245 Bldg B02 - Level 05 Proposed GA Plan

MLUK-721-A-P-A2-1246 Bldg B02 - Level 06 Proposed GA Plan

MLUK-721-A-P-XX-2100 Bldg A01 & A02 Sections

MLUK-721-A-P-XX-2101 Bldg B01 Sections

MLUK-721-A-P-XX-2102 Bldg B02 Sections

MLUK-721-A-P-A0-3100 Public Square Elevation - South

MLUK-721-A-P-A0-3101 Public Square Elevation - East

MLUK-721-A-P-A1-3110 Bldg A01 Elevation - South

MLUK-721-A-P-A1-3111 Bldg A01 Elevation - West

MLUK-721-A-P-A1-3112 Bldg A01 Elevation - North
MLUK-721-A-P-A1-3113 Bldg A01 Elevation - East rev 01: revised September 2020
MLUK-721-A-P-A2-3120 Bldg A02 Elevation - South
MLUK-721-A-P-A2-3121 Bldg A02 Elevation - West
MLUK-721-A-P-A2-3122 Bldg A02 Elevation - North
MLUK-721-A-P-A2-3123 Bldg A02 Elevation - East rev 01: revised September 2020
MLUK-721-A-P-B1-3130 Bldg B01 Elevation - South
MLUK-721-A-P-B1-3131 Bldg B01 Elevation - West
MLUK-721-A-P-B1-3132 Bldg B01 Elevation - North
MLUK-721-A-P-B1-3133 Bldg B01 Elevation - East rev 01: revised September 2020
MLUK-721-A-P-B2-3140 Bldg B02 Elevation - South
MLUK-721-A-P-B2-3141 Bldg B02 Elevation - West
MLUK-721-A-P-B2-3142 Bldg B02 Elevation - North
MLUK-721-A-P-B2-3143 Bldg B02 Elevation - East
MLUK-721-A-P-XX-3200 Bay Study - Typical Projecting Balcony
MLUK-721-A-P-XX-3201 Bay Study - Typical Inset Balcony
MLUK-721-A-P-XX-3202 Bay Study - Deck Access Balcony
MLUK-721-A-P-XX-3203 Bay Study - Bldg A01 Cafe
MLUK-721-A-P-XX-3250 Bay Detail – Typical Window
MLUK-721-A-P-XX-3251 Bay Detail – Typical Balcony
MLUK-721-A-P-XX-3252 Bay Detail – Bldg B01
MLUK-721-A-P-XX-3253 Bay Detail – Bldg B01
MLUK-721-A-P-XX-3254 Bay Detail – Bldg B02
MLUK-721-A-P-XX-3255 Bay Detail – Bldg A01 Café
537-CTF-XX-00-DR-L-1000 Landscape General Arrangement Plan rev 01: revised
September 2020
537-CTF-XX-00-DR-L-1002 Landscape General Arrangement Plan - Bus Interchange
537-CTF-XX-07-DR-L-1001 Green Roofs Plan
537-CTF-01-ZZ-DR-L-2000 Plot A Landscape Sections
537-CTF-01-ZZ-DR-L-2001 Plot A Landscape Sections
537-CTF-02-ZZ-DR-L-2002 Plot B Landscape Sections
537-CTF-XX-ZZ-DR-L-5000 Planting Plan
537-CTF-XX-XX-DR-L-7000 Tree Removal Plan

1. EXECUTIVE SUMMARY

- 1.1 The Application Site comprises approximately 1.13 hectares of land to the west and east of the existing Arnos Grove London Underground Limited (LUL) station and Piccadilly line tracks. It comprises two car parks, referred to throughout this report as Site A (existing western car park) and Site B (existing eastern car park).
- 1.2 The site is identified as an 'opportunity site' (no. 7) within the Council's adopted North Circular Area Action Plan (NCAAP 2014 - 'New Southgate Neighbourhood Place'). NC Policy 17 (Arnos Grove Station – Site 7) establishes the principle of redeveloping the Application Site.
- 1.3 Arnos Grove LUL station is a Grade II* listed building. The designation includes existing walls which extend east and west of the main station building (and existing lampposts).
- 1.4 This report considers two interrelated submissions, in summary:
 - 1.4.1 *20/01188/LBC*: seeks Listed Building Consent for alterations to curtilage listed walls (and lampposts) to the Grade II* Listed Arnos Grove LUL Station; and
 - 1.4.2 *20/01049/FUL*: seeks full planning permission for development comprising 4 no. buildings to accommodate 162 no. new (Build to Rent) homes, ground floor (non-residential) unit and with areas of public realm, hard and soft landscaping, access and servicing arrangements, plant and associated works.
- 1.5 The delivery of housing on underutilised brownfield sites in sustainable locations (directly adjacent to a tube station) and partially within and directly adjacent to a designated local centre (Arnos Grove Local Centre) has strong planning policy support and should be afforded substantial weight in the determination of the application. The site is situated directly adjacent to a tube station and bus interchange – providing a robust case for a car-free development (as assessed below).
- 1.6 Developing on brownfield land protects the Borough's greenfield and greenbelt land, preserving this important characteristic of Enfield – and is supported at all planning policy levels, nationally, London-wide and within Enfield's adopted development plan policies.
- 1.7 The proposal would support London Plan and emerging Mayor of London (Intend to Publish) London Plan policies (LPItP) – which seek to increase housing supply and optimise site capacity. The site is assessed to be a highly sustainable location suitable for delivery of new high-quality housing – which is supported in principle. The introduction of a small flexible commercial space or residential amenity space is supported in strategic and placemaking terms.
- 1.8 The proposed development is a Build-to-Rent scheme, which proposes to deliver 162 no. new homes, of which 40% (64 no.) would comprise high-quality affordable homes (by habitable room) to meet housing need – which continues to rise in the Borough.
- 1.9 Officers have assessed that the proposed development would deliver a high quality residential-led development on existing brownfield land – in a sustainable location. The site has a PTAL of 4 - 6a (6b being the best). The

proposal would make a meaningful contribution towards Borough and wider London housing needs – helping Enfield support its growing population.

- 1.10 The site is identified as an 'opportunity site' within Enfield's adopted development plan. NC Policy 17 also sets out that the site has potential to be released for redevelopment. The principle of development is supported at this location (detailed assessment below). The redevelopment of car parks and public sector owned sites for housing is supported by LPItP.
- 1.11 The proposals would result in the loss of 297 no. public car parking spaces in total. This would comprise a loss of 180 parking spaces in the western car park (Site A) and loss of 117 car parking spaces in the eastern car park (Site B).
- 1.12 6 no. existing blue badge car parking spaces are proposed to be re-provided (Site A / western car park). 2 no. existing Transport for London taxi drop-off bays are located within the interchange – and the Applicant has committed to their re-provision. 10 no. existing car parking spaces for London Underground staff are to be re-provided. Officers have secured a commitment from the Applicant to work with the council to provide a drop-off location following closure of the existing car park, and during the construction phase. This would be monitored during the construction period – and would be subject to a future decision on arrangements. The obligation would be secured by Section 106 agreement and include a cascade mechanism.
- 1.13 Public cycle parking spaces are proposed to be more than doubled (from existing provision of 38 no. public cycle parking spaces to 76 no. public cycle parking spaces). The Applicant has provided details of indicative re-provision and dispersal of these cycle spaces, which includes 40 no. cycle parking spaces within the proposed public square and adjacent to the proposed commercial unit. The Applicant has committed to providing 5% of total public cycles spaces as non-standard cycle parking spaces.
- 1.14 In assessing the proposed loss of the public car parking spaces (except for blue badge spaces) and the scheme generally, Officers have carefully considered and had due regard to the need to eliminate discrimination and advance equality of opportunity, as set out in Section 149 of the Equality Act 2010. The Officers assessment, and recommendation, has given due regard to the Public Sector Equality Duty and the relevant protected characteristics. Officers assessment includes consideration of benefits of the scheme, which locally and specifically include improved blue badge space design, layout, lighting and surfacing, improved public realm (design, layout, lighting and gradients) within the scheme and increased and improved public cycle parking – including 5% of cycle parking spaces dedicated for non-standard cycles. Strategic benefits are considered below.
- 1.15 In assessing the proposed loss of the public car parking spaces (except for blue badge spaces), the Officers assessment has included consideration of: adopted development plan policies, including NC Policy 17; the NCAAP Equality Impact Assessment – Equality Analysis (2013); Applicant submitted data (including details on trip purposes and origin); Applicant submitted data on the utilisation of the car parks; Officer consideration of objections received (including comments and geographic considerations); Section 70(2) of the Town and Country Planning Act 1990; Section 38(6) of the Planning and Compulsory Purchase Act 2004 and additional material considerations. Additional material considerations include strategic, and local benefits, of implementing the Mayor of London's draft London Plan Intend to Publish (LPItP) transport policies – which seek to achieve a more accessible

environment for those who might not otherwise be able to travel; the fact the majority of Transport for London stations do not have car parks; and the accessibility of all of Transport for London's buses.

- 1.16 The data assessed has supported Officers conclusions that credible alternative routes and options exist for most existing public car park users. This would support a local reduction in vehicle movements generated by the existing car park use, particularly during the week. Officers have secured mitigation measures (see below).
- 1.17 In respect of the residential proposals, the scheme proposes 5 no. blue badge spaces (plus passive provision for a further 11 no. blue badge spaces). 288 no. new long and short stay (resident and visitor) cycle parking spaces are proposed. Except for proposed blue badge parking spaces, the residential element is proposed to be 'car free'. Officers have considered the credibility of a 'car free' approach for proposed new homes at this location, alongside the alignment of the proposed approach with LPItP/ draft Policy T1 (development proposals should facilitate the delivery of the Mayor's strategic target of 80 per cent of all trips in London to be made by foot, cycle or public transport by 2041) – T6.5.
- 1.18 The associated application seeking Listed Building Consent has been submitted and assessed by Officers. It proposes changes, and partial demolition and rebuilding, to existing low / boundary walls and existing concrete lamp posts. Consent for works affecting the listed structures in this area require that Historic England recommend authorisation to the Secretary of State prior to the approval. The Secretary of State has considered the information given and does not intend to require the application be referred to him. Officers recommend the Listed Building consent be granted.
- 1.19 The proposal has raised significant interest and a substantial number of objections have been received. This includes 2 no. petitions objecting to the proposals. Objections have been received from stakeholder / local amenity groups objecting to the proposals. Two Members of Parliament, one London Assembly Member, one Enfield Councillor and two Barnet Councillors have written to object to the proposal. These have been carefully considered, alongside assessment of the proposed scheme against adopted and emerging planning policy and guidance and relevant material considerations.
- 1.20 The public benefits of the scheme are summarised as follows:
 - 1.20.1 **Placemaking benefits, including a sympathetic heritage-led design response** – Arnos Grove Station is a Grade II* listed building of unique importance to Enfield. It is one of the most highly regarded examples of Charles Holden's ground-breaking Modernist designs for the Piccadilly line extension. It is a key landmark for the local area. The proposed scheme is designed by RIBA Stirling award winning architects, Maccreeanor Lavington. The design, scale and density of the scheme are assessed as have sympathetically responded to this important designated heritage asset – positively preserving and enhancing it. Officers have assessed that the scheme strikes a good balance between being sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (including increased density). The proposals would result in an improved setting to the station building, including the introduction of a new public square to the west of the station building. The Enfield Society, Enfield Heritage Officers and the Greater London

Authority heritage comments are supportive of the heritage merits and benefits of the scheme. Enfield's independent Design Review Panel concluded, in their last review, that the height and scale of the scheme was appropriate for the surrounding context.

- 1.20.2 **Optimising the site capacity by introducing new high-quality housing** – All homes would meet, and in some cases exceed, draft London Plan (ItP) Policy requirements for Build to Rent, including minimum tenancies of up to 5 years to all tenants; rent and service charge certainty for the length of the tenancy; and secure on-site management. The proposal would support Ambitions 1, 3, 4 and 5 of Enfield's 'Housing and Growth Strategy' (2020).
- 1.20.3 **Socially sustainable and balanced housing market** – The Application Site is located within an area primarily characterised by owner occupied housing and other private tenures. The proposals would introduce affordable housing, supported by London Plan policy and guidance (adopted and draft), which would encourage socially sustainable, balanced housing market and address a lack of affordable homes in the local area – enabling local people to access good quality housing.
- 1.20.4 **Affordable housing, including family housing for local people** – 40% affordable housing by habitable room, which would meet an identified local need for affordable Discounted Market Rent housing (with 30% at London Living Rent equivalent levels), supported by London Plan policy and guidance (adopted and draft). Approximately 56,000 Enfield households could be eligible to access the affordable element. These would be households unlikely to be eligible for council allocated housing but who are also unable to afford private sale housing. All family homes (3-bed) in the scheme are affordable. Viability reviews have been agreed – with potential to direct any surplus towards improving 3-bed / family housing affordability.
- 1.20.5 **Introducing a compatible land use** – The proposals would introduce compatible residential-led land use – beneficially reducing privacy, noise, air quality, and disturbance issues arising from the current publicly accessible car parking to rear of homes along Brookdale, Walker Close and Arnos Road. The removal of the car parks would replace an existing arrangement of low townscape quality, which does not contribute towards, and potentially detracts, from the Grade II* listed building.
- 1.20.6 **Apprenticeships, skills and training opportunities for local people** – Approximately 250 jobs would be created over the construction period.
- 1.20.7 **A net increase in trees and biodiversity net gain exceeding target** – introducing 28 net additional trees and 30.80% biodiversity net gain (exceeding Environmental Bill / forthcoming Act requirements). The scheme increases greening on-site, in accordance with the relevant draft London Plan (ItP) Urban Greening Factor target (0.419).
- 1.20.8 **Targeting a carbon neutral borough by 2040 (Enfield Climate Action Plan 2020)** – Enfield envisages that by 2040, most journeys that originate in the borough will be made by methods that are either low carbon, or do not emit carbon. The proposal would positively contribute to this target and the Council's aim for Enfield to become carbon neutral by 2040.
- 1.20.9 **A healthy development and less road traffic** – the loss of car parking has generated significant objection (assessed in detail below). The loss of parking would also, however, result in benefits which would have

associated pedestrian, cycle and road safety benefits. The whole borough is an Air Quality Management Area, by prioritising walking and cycling and low carbon transport, the proposals have potential to improve local air quality. This will also support Enfield in achieving the Mayor of London's target to increase active and sustainable modes across London to 80%.

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

2. RECOMMENDATION

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

Full Planning:

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

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

2.5 Listed Building Consent:

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

curtilage listed dwarf walls and railings on the north and south sides of the forecourt. The development shall only be carried out in accordance with the relevant detail drawings, method statement and schedule.

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

2.6 Informatives

- 1) Co-operation
- 2) CIL Liable
- 3) Hours of Construction
- 4) Party Wall Act
- 5) Street Numbering
- 6) Sprinklers
- 7) Surface Water Drainage
- 8) Water Pressure
- 9) Underground Water Supply/Drainage Assets
- 10) Fail Safe Use of Crane and Plant
- 11) Security of Mutual Boundary
- 12) Fencing
- 13) Demolition
- 14) Vibro-impact Machinery
- 15) Scaffolding
- 16) Abnormal Loads
- 17) Cranes
- 18) Encroachment
- 19) Trees, Shrubs and Landscaping
- 20) Access to Railway
- 21) Sustainable Infrastructure

Section 106 Heads of Terms

- 2.7 The NPPF requires that planning obligations must be:
- (a) Necessary to make the development acceptable in planning terms;
 - (b) Directly related to the development; and,
 - (c) Fairly and reasonably related in scale and kind to the development.
- 2.8 Regulation 122 of the CIL Regulations 2010 brought the above policy tests into law, requiring that planning obligations can only constitute a reason for granting planning permission where they meet such tests. Section 106 obligations should be used where the identified pressure from a proposed development cannot be dealt with by planning conditions and the infrastructure requirement relates specifically to that particular development and is not covered by CIL.
- 2.9 The Council's Planning Obligations SPD (November 2016) provides guidance on, amongst other things, the range and nature of planning obligations that the Council will seek, including details of the formulas used for calculation. The Council's Infrastructure Funding Statement (2019/2020) sets out planned expenditure over the current reporting period (2020/21).
- 2.10 Officers have secured Section 106 contributions of **£391,142** (including **£180,700** towards transport and **£70,957** towards health). In addition, Community Infrastructure Levy in the order of **£1,765,181** would be payable.
- 2.11 These are the Heads of Terms proposed:
1. Affordable housing:
 - a. Minimum of 40% by habitable room (39.5% based on units);
 - b. Tenure to comprise 70% Discounted Market Rent (DMR) and 30% DMR homes to be let at London Living Rent levels;
 - c. Rents set up to 65-70% of open market rent rates subject to the GLA's household income cap in place at the time of letting;
 - d. Marketing of affordable homes – prioritising households that live or work in the Borough;
 - e. All related communal open space and play space in a particular Block or Plot to be available to all residents (irrespective of tenure);
 - f. Quality standards;
 - g. Affordable housing secured in perpetuity.
 2. Viability Review Mechanisms:
 - a. Early Stage Review (if no "substantial commencement" within 24 months);
 - b. Late Stage Review (prior to 75% of private residential units being sold or let); and
 - c. Early and Late Stage Reviews capped at 40% Affordable Housing (70% Discounted Market Rent (DMR) and 30% DMR homes to be let at London Living Rent levels (LLR)).
 3. Build to Rent requirements:
 - a. 15-year minimum covenant;
 - b. Clawback clause;
 - c. Self-contained and let separately;
 - d. Unified management and ownership;
 - e. Tenancies of up to 5-years available to all;
 - f. Rent and service charge certainty for the length of the tenancy;
 - g. On-site management;

- h. Complaints service in place; and
 - i. No up-front charges etc.
4. Sustainable Transport Infrastructure (Healthy Streets and Improvements) (£95,000):
Allocation scope:
 - a. Local pedestrian, cycle and highway infrastructure beyond the red line (application boundary);
 - b. Surveys (informing the need for local improvements such as a pedestrian crossing along Bowes Road; drop off-surveys; local Pedestrian / cycle Infrastructure Surveys) – with link to s278;
 5. Sustainable Transport Package (up to £45,700):
Allocation scope:
 - a. Car Club Membership per home for 3 years; £50 car club driving credit per home; £50 Oyster OR Cycle Voucher.
 - b. Travel Plan monitoring (£5,500), including a Travel Plan to be prepared and implemented; commitment to review; appointment of Travel Plan Coordinator and monitoring of Travel Plan initiatives including TRICS compliant surveys.
 6. Local Car Parking Controls: Management and Monitoring (£40,000):
 - a. A contribution towards monitoring and consultation on an extension to the CPZ near the development
 - b. Local parking consultation and extension: If post occupancy surveys show impacts with the existing CPZ, then funds provided for consultation on potential extension (to be agreed).
 7. New Resident Parking Exemption
 - a. Resident car ownership would be managed by the developer, including a clause within resident contracts restricting them from applying for or being eligible for on-street parking permits within the relevant Controlled Parking Zone.
 - b. The CPZ exemption will be secured via the S106 agreement using powers under S16 of the Greater London Council (General Powers) Act 1974
 8. Station Access Road
 - a. Improvements associated with the development of the site, within the red line boundary implemented through Section 278.
 - b. Alterations to site accesses / works to site frontage along the highway.
 9. Energy
 - a. Priority DEN connection;
 - b. Development to provide no less than a 35% improvement in total CO2 emissions arising from the operation of the development and its services over Part L of Building Regs 2013.
 - c. Revised Energy Statement to be submitted;
 - d. Be Seen (Post construction monitoring). Post construction monitoring as per 'be seen' guidance.
 10. Carbon Offsetting financial contribution
 - a. Payment of off-set contribution (£139,847 linked to 9.a);
 - b. Sign up to GLA energy monitoring platform.
 11. Health financial contribution
 - a. Payment of contribution (£70,957);

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

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

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

15. Architect Retention Clause
 - a. Retention of architects

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

3. SITE AND SURROUNDINGS

- 3.1 The site comprises two existing car parks located at Arnos Grove underground station. Arnos Grove underground station is in the south-west of the Enfield, within Southgate Green Ward. Arnos Grove Underground Station serves the Piccadilly line between Cockfosters station and Heathrow airport.
- 3.2 The application site is approximately 1.13 hectares, comprising two car parks – referred to throughout this report as Site A (existing western car park) and Site B (existing eastern car park). In total there are 313 car parking spaces, comprising: 297 no. general purpose car parking spaces; 10 no. LUL staff parking spaces; and 6 no. blue badge spaces. Refer **Appendix 1 & 2**.
- 3.3 The site is well connected in terms of public transport and has a Public Transport Accessibility Level (PTAL) rating of 4-6a with 4 being 'good' and 6a 'excellent'. Refer **Appendix 3**.
- 3.4 As well as the underground station the site is well served by buses. A bus interchange is located directly to the front of the station on Bowes Road. The retail parade to the east, and partially within the site, is designated as a Local Centre. The Arnos Grove Local Centre includes a row of commercial and retail units, with several containing residential accommodation above. The ground floor units contain a mixture of uses, including estate agents, convenience stores, cafes, food outlets and hairdressers. A small supermarket – a 'Sainsbury's Local' is located to the west of the Application Site, within the retail parade.
- 3.5 The Arnos Arms public house and car park is located to the east of the station. Other uses in close proximity include an indoor swimming pool and library (Bowes Road Library and Arnos Pool – Grade 2 Listed Building) and an NHS medical clinic. Arnos Park (locally listed, Metropolitan Open Land) and several places of worship and schools are also nearby. Refer **Appendix 4**.
- 3.6 **Topography:** The surrounding topography generally rises from east to west, with the Application Site located at a low to mid-point between lower areas to the east (Arnos Park / Pymmes Brook), and high point to the west (Betstyle Circus). Further afield, and to the north, Southgate Green (is located at a high point. The Application Site is not located on a ridge or high-ground. Refer **Appendix 5**.
- 3.7 **Station building:** Arnos Grove LUL station is a Grade II* listed building. The designation includes existing walls which extend east and west of the main station building (and existing lampposts). Refer **Appendix 6**.
- 3.8 **Site A:** Site A, the car park located to the west of the station and railway tracks, is approximately 0.68 ha in size, provides 180 spaces and six blue badge holder spaces.
- 3.9 The Site contains structures listed by virtue of the curtilage of the Grade II* listed station. The car park is situated on a slightly raised plateau, with the land banking down to the east, west and north, resulting in approximately a one-storey level change across the Site. Site A generally falls towards to the north. The Site falls from approximately 45mAOD near Bowes Road to approximately 36mAOD in the north.

- 3.10 The closest neighbouring properties to the west, are located along Brookdale (Nos. 1, 3, 5, 7, 9, 11, 13, 15, 17, 19, 21, 23, 25, 27, 29 and 31). The eastern elevations of these properties typically accommodate bedrooms at first floor level and living and/or dining rooms at ground floor. The properties are characterised by deep rear gardens and two to three storey terraces and detached houses.
- 3.11 On Bowes Road, Nos. 348, 350, 352 and 354 are in closest proximity to the Application Site. These properties are characterised by commercial uses on the ground floors and residential accommodation situated above.
- 3.12 A pocket of dense trees and shrubs designated as Metropolitan Open Land (MOL), lies to the north of the existing western car park on Site A. No built development is proposed within this area. An existing fence line between the car park and area of open space is proposed to be removed. The area to the north of the existing car parks together with the embankment separating the two car parks is designated as a Grade II Site of Borough Importance for Nature Conservation (SINC). Site A is bound to the south by the A1110 Bowes Road.
- 3.13 **Site B:** Site B, the car park located to the east of the station and railway tracks, is approximately 0.45 ha in size and provides 117 spaces, and 10 LUL staff spaces. This Site comprises hardstanding and adjoins a wall that forms part of the Grade II* listed station.
- 3.14 To the east, Site B is bound by gardens of two-storey houses which form part of Arnos Road, and to the south by the A1110 Bowes Road. Within Arnos Road Nos. 3, 5, 7, 9, 11, 13, 15, 17, 19 and 21 are in closest proximity to the Application Site. Within Bowes Road, The Arnos Arms at No.338 Bowes Road is in closest proximity. Walker Close to the north of the Site is also in close proximity with Nos. 1, 2, 3, 4, 5, 6 and 27 being the most relevant.
- 3.15 With regards to the Arnos Road properties, the rear of the properties face onto the Application Site, and the rooms typically located at the rear would comprise bedrooms at first floor level and lounge/kitchen/dining rooms at ground floor level. Whilst in Walker Close because of the orientation of these properties it is the southern side elevations of the properties that would face the Application Site (flank walls).
- 3.16 A series of mature trees line the west boundary of the Site which also form part of the SINC designation. Beyond this, is the embankment and London Underground Piccadilly line tracks which are also within the Wildlife Corridor designation. The Arnos Arms pub is located east of the Site on Bowes Road, and is a non-designated heritage asset.
- 3.17 To recap the above the properties in closest proximity to the Application Site are as follows (Refer **Appendix 7 & 8**)
- Bowes Road – No's 348, 350, 352 and 354
 - Brookdale - No's 1, 3, 5, 7, 9, 11, 13, 15, 17, 19, 21, 23, 25, 27, 29 and 31
 - Walker Close – No's 1, 2, 3, 4, 5, 6 and 27
 - Arnos Road – No's 3, 5, 7, 9, 11, 13, 15, 17, 19 and 21
 - The Arnos Arms 338 Bowes Road
- 3.18 The following policy designations / characteristics apply to the site:
- Flood Risk: The Site is located within Flood Zone 1 (classified as 'low risk').

- Listed Building: The underground station and items within the curtilage
- Local Centre: The frontage of Site A and the Underground Station are within Bowes Road Local Centre;
- Metropolitan Open Land (MOL): The area to the north of Site A, within the Site boundary is designated Metropolitan Open Land;
- North Circular Area Action Plan Opportunity Site (Site 7);
- New Southgate Place Shaping Area;
- Place Shaping Priority Area / Regeneration Priority Area / Area Action Plan;
- Site of Borough Importance for Nature Conservation (SINC): The site is adjacent to (but outside of) a SINC which runs along the railway track in the centre and to the north and also encompasses a Wildlife Corridor; and
- Tree Preservation Order: There is a cluster of Tree Preservation Orders (TPOs) to the north of Site B, outside the application boundary to the north (trees 60 and 61).

4. PROPOSAL

- 4.1 This is an application for the erection of four Built-to-Rent blocks comprising 162 residential units (Class C3) and a flexible use ground floor unit (A1/A3/A4) together with areas of public realm, hard and soft landscaping, access and servicing arrangements, plant and associated works.
- 4.2 The building heights and unit numbers would be as follows:
- Block A01, Site A: part 1-storey, part 4-storeys (34-units)
 - Block A02, Site A: part 6, part 7-storeys, with elements at lower ground (66)
 - Block B01, Site B: 3-storeys (16-units)
 - Block B02, Site B: part 5 storeys, part 6-storeys (46-units)
- 4.3 The tallest of these buildings – Block A02: will be located towards the north-eastern corner part of the site nearest to Arnos Park at the rear. The shortest building within the group of four (Block B01: 3-storeys being located at the front of the site, nearest to Bowes Road to the south-west. Block A01 includes a 1-storey element fronting the proposed square.
- 4.4 The emphasis of the proposed buildings' fenestration is on the horizontal to tie-in with Charles Holden's art-deco architecture of the station and also the art-deco reflected in the locality and surrounding townscape. The design of the scheme is the result of substantial pre-application engagement to produce high-quality buildings and public realm which incorporates and reflects the vernacular of the surrounding townscape. In addition, the articulation and materiality of the buildings have been carefully considered to provide a contemporary and sympathetic interpretation of the Grade II* station and associated heritage assets.
- 4.5 Some level of parking for the proposed development will be retained in the form of blue badge spaces and also the re-provision of spaces for London Underground Ltd (LUL) staff. Otherwise the proposal will be car free in line with current and emerging Enfield and London Plan policy, as the Borough and city move closer to addressing climate change by facilitating such measures as car free development with good public transport links such as this.
- 4.6 The scheme proposes the provision of 40% affordable housing (by habitable rooms), with a breakdown of 70% Discounted Market Rent and 30% DMR at London Living Rent rent equivalents. The remainder of the homes would be let at open market rent levels.

- 4.7 The proposed development includes resident/tenants' lounge, concierge and gym will be available for residents of the development.
- 4.8 158 sqm of doorstep play, plus 150 sqm of 'incidental' playspace for 0-5-year olds is proposed, to be distributed across Sites A and B. A further 120 sqm of play 'opportunity' for children aged 5+ is proposed within Site A, which also houses the affordable tenure units.
- 4.9 Communal amenity space of 3,230sqm is proposed across the scheme.
- 4.10 288 long stay cycle parking spaces are proposed for residents which will be secured and covered within the buildings. Six external short stay visitor cycle parking spaces will also be provided. With regards to car parking, five blue badge spaces are proposed (3% of the total number of homes), with the landscape within the scheme being designed in such a way that a further six blue badge spaces (10% in total, or a further 7%), could become available should the demand arise.
- 4.11 An associated Listed Building Consent application also accompanies the application for partial demolition and rebuilding, retention and refurbishment of four existing listed lampposts two of which are relocated to accommodate a new public square.
- 4.12 **Residential amenity – typical units:** Residential quality is considered in the assessment section of the report below. The new homes are proposed to meet or exceed Nationally Described Space Standards and all new homes are proposed to meet building regulations Part M4(2) standards and the London Plan. Two-bed homes are proposed to contain en-suite bathrooms, suited to two people renting together, with an open plan living space and two equally sized bedrooms.
- 4.13 All new homes will have access to private amenity space. Proposed new homes have been designed to meet minimum areas from the following Design Standards: Draft New London Plan 2019 – Overall Unit Areas; Housing SPG March 2016 – Amenity areas; Technical Housing standards – Bedroom Areas; Building Regulations M4(3) for Wheelchair adaptable units, K/L/D and storage.
- 4.14 The application documents demonstrate how the scheme has evolved through the pre-application process, through to submission. The Applicant has submitted a comprehensive 236-page Design and Access Statement in support of the submissions. Extracts are included at **Appendix 9**.
- 4.15 **Pre-submission applicant-led engagement:** The scheme was subject to extensive pre-application discussion and engagement.
- 4.16 Pre-application engagement included meetings and workshops with Council officers, independent design review by Enfield Design Review Panel, presentation to planning committee at pre-application stage (a Technical Briefing), stakeholder engagement and public consultation and engagement. The scheme proposals have evolved during the course of negotiations with the applicants (including during pre-application stages) in response to comments.
- 4.17 A Statement of Community Involvement (SCI) has been submitted as part of the application to demonstrate how they engaged with the local community. The SCI states that the programme of consultation ran from June 2019 to

March 2020, with the digital element live from 7th November 2019 to 13th December 2019 and included seven meetings with political stakeholders; meetings with three key community groups; a 'Meet the Team' event; one public consultation over 2-days; and various electronic and non-electronic (leaflets and posters) communication. This shows the applicant has made robust efforts to engage with local residents, businesses and stakeholders to try and address questions, queries and concerns in relation to the proposal.

- 4.18 **Technical briefing:** A Technical Briefing with Planning Committee Members was held on 5th November 2019. The purpose of the Briefing was to provide an overview of the scheme to date however the Briefing was not a forum for discussion of the proposal. The briefing was well attended by Members.
- 4.19 **Changes post submission:**
- 4.20 Some revisions have been made to the scheme during the assessment of the application. These revisions have comprised as follows:
- Revised boundary treatments have been proposed on both Sites A and B however the final details of these (height and materials) are subject to a planning condition)
 - Changes to incorporate a balcony in Building A01 to one unit that previously did not have one. All units now have at least a 5 sq.m private balcony; and
 - Building B01 – external amenity and defensible space: Changes have been made to alter external amenity space provided to the north and west of building B01 from communal to private resulting in a minor change to the communal amenity from 3,438sqm to 3,230sqm and an increase in the Urban Greening Factor score from 0.417 to 0.419. Additionally, a 700mm concrete spandrel panel has been added to the four eastern ground floor units to B01 to provide security and privacy to those units.
- 4.21 **Land use:** Changes to the Use Classes Order 1987 came in to force on the 1st September 2020. The Regulations that introduced the changes require Local Planning Authorities to determine applications that were submitted prior to this date in accordance with the previous use classes. This report therefore refers to the previous use classes throughout.
- 4.22 All of the above matters are discussed further in the main body of the report below.
- 5. RELEVANT PLANNING DECISIONS**
- 5.1 In October 2017 an application for the conversion of the first floor of the Arnos Arms, 338 Bowes Road, from public house accommodation to 4 x 1-bed self-contained flats involving new entrance at rear (application reference 17/01590/FUL) was granted planning permission.
- 5.2 Over the last 20-years there have been a number of listed building consent applications for minor alterations to the station building have been submitted. One of these was a 2004 Listed Building Consent application (application reference LBC/03/0020/2) for repair and refurbishment of historic features within the station. This was approved in 2005. Further applications have been made since then for works such as the installation of a ticket checking kiosk, replacement cabins on the platform and other repairs.
- 5.3 In September 2019 an EIA Screening Opinion request was made to the Council to establish whether the proposed works would constitute EIA

development as assessed against Regulation 6(1) of the EIA Regulations. The council agreed that the Development did not constitute EIA development. (Application reference 19/03312/SO).

6. CONSULTATIONS

- 6.1 In November 2015, the Council adopted a Statement of Community Involvement (SCI), which sets out policy for involving the community in the preparation, alteration and review of planning policy documents and in deciding planning applications.
- 6.2 Paragraph 3.1.1 of the adopted version sets out the expectation of the Council: “The Council aims to involve the community as a whole: to extend an open invitation to participate but at the same time ensure that consultation is representative of the population. To achieve this, a variety of community involvement methods will need to be used. Targeted consultation of stakeholders and interest groups, depending upon their expertise and interest and the nature and content of the Local Plan documents, or type of planning application, will be undertaken.”
- 6.3 Paragraph 5.3.6 goes on to state: “In the case of ‘significant applications’, additional consultation will be carried out depending upon the proposal and site circumstances: Developers will be encouraged to provide the community with information and updates on large scale or phased developments using websites, public exhibitions and newsletters”. As noted above, the Applicant undertook pre-submission engagement.

Public Consultation

- 6.4 Initial consultation on the application involved notification letters being sent to 1,320 neighbouring properties on 19 May 2020 (giving people 28-days to respond) and a press advert in the Enfield Independent on 13 May 2020 (giving people 14 days to respond).
- 6.5 Following receipt of revisions and supplementary information, a further round of consultation was undertaken on the application. This comprised sending letters to the same neighbouring properties on 23 October 2020 and placing 2 no. site notices on site on 23 October 2020. The letters and site notice gave people 21 days to comment. A press advert was also placed in the Enfield Independent on 23 October 2020. A final press advert was also placed in the Enfield Independent on 16 December 2020 following receipt of the Applicant’s Equality Impact Assessment.
- 6.6 In respect of 20/01188/LBC 32 x objections have been received.
- 6.7 In respect of 20/01049/FUL the number of representations received from neighbours, local groups etc. in response to notification and publicity of the application were as follows:

Number of representations objecting received: 103
 Number of representations received in support: 5
 Number of neutral representations received: 3

Objections Table: Summary of Reasons for Comment

Inadequate access	12
Inadequate public transport provision	21
Increase in traffic	65

Increased pollution	50
Loss of light, including loss of sunlight	25
Housing is not affordable	6
Loss of parking	81
Inadequate parking provision / car-free development is not credible	87
Close to adjoining properties	30
Strain on existing community facilities	59
General dislike of proposal	46
Impact on Ecology	31
Overdevelopment	43
Development too high	61
More open space needed on development	17
Out of keeping with character	49
Conflict with local plan	13
Noise nuisance	32
Loss of privacy	29
Increase danger of flooding	3
Local shops: run down / not enough retail / too much	4
Exacerbate congestion on Bowes Road	8
Money should be spent on offering leisure facilities	1
Not enough information submitted / misleading information	9
There is already too much development, including new blocks	3
Coronavirus related	5
Concerns about rise in anti-social behaviour / crime	4
Harm of extending CPZ	5
Currently suffer from overspill / concerns about future overspill	18
Impact on Listed Building	11
Dislike of architecture	1
Impacts of view for houses / overbearing	5
Potentially contaminated land	2
The council should encourage home ownership, not investors	3
Impact on Arnos Park, including on its country feel	3
Loss of trees, including mature trees and loss of privacy	3
Building over car parks will stop people using public transport	4
West Enfield is not an appropriate for new housing. East Enfield is	1
Cannot access underground system from Enfield Town	2
Concerns about parking loss relative in respect of PCGs	6
Not consistent with New Southgate Masterplan	3
Insufficient provision of blue badge and other partially disabled drivers	1
A tube station without adjacent parking is not credible	2
No drop-off	3

6.8 Approximately 16% of objections received do not include an address.

6.9 A summary of reasons stated by those supporting the scheme were:

- Removing the car park will encourage more sustainable travel patterns to the station.
- Alternatives exist for users of the station.
- These new homes with no car parking except for disabled residents, with plentiful bike parking and a great level of public transport access, will help support residents in the car-free lifestyle that we need to see increasing across Enfield with its growing population.
- The development will provide a new public square, helping to improve the public realm in Arnos Grove to the benefit of other residents and visitors.

- This area is severely lacking low density, sympathetically designed affordable rent housing for key workers and others with a need to access to central London but unable to get on the housing ladder
 - Pleased that the buildings will be for rent with a high proportion of affordable properties
 - The designs are of a high quality and in keeping with the station
 - Pleased that there will be shops/cafes in the development
 - Pleased that the development will encourage the use of public transport and will eliminate all but essential disabled parking on the site
 - It is a forward-looking proposal for Enfield
- 6.10 Consultation responses that fall outside of the remit of Planning (i.e. are non-material) are:
- Negative effect on prices of property
 - Impact on views (non-TVIA, non-heritage)

Petitions

- 6.11 In total, 2 no. petitions objecting to the application have been submitted.
- 6.12 A petition objecting to the scheme from the **Bowes Road Resident Group**. The petition was submitted to Officers in June 2020 (signed by 33 residents). Details set out in the next section under '**Bowes Road Resident Group**'.
- 6.13 An e-petition objecting to the scheme submitted by **Cllr Daniel Anderson**.
- 6.14 The e-petition is a Change.org petition. At the time of writing this report the petition had 3,097 signatories. Cllr Anderson submitted the petition, initially in June 2020 and in November 2020 (by which time it had been signed by 3,089 people).
- 6.15 The grounds of objection set out in the e-petition's covering statement are set out in detail below.
- *Displaced parking onto residential streets:* The station car parks operate as a 'park & ride' facility because those using them are coming from other areas with poor public transport facilities. The development will not lead to less cars on our roads, but will simply displace parking onto nearby residential streets, necessitating a 24/7 Controlled Parking Zone (CPZ), the cost of which will fall on residents and not TfL.
 - *Increased congestion on Bowes Road:* Arnos Grove Station already has a significant problem as a commuter drop-off point, the result of which is the blocking of buses seeking to enter the station forecourt and causing logjams along Bowes Road. This is likely to increase and so lead to more congestion in the area.
 - *Bad for the environment:* Many more residents will instead of paying for a 24/7 CPZ concrete over their gardens, which will lead to further drainage problems, such as flash flooding, thereby working against the environment and worsening the effect of climate change.
 - *Housing would be unaffordable to most Enfield residents:* Just 40% of the proposed development will be affordable and, even then, this will be on the Mayor's definition of affordability, which is up to 70% higher than Enfield's social rent levels. These flats will therefore be unaffordable to most Enfield residents, especially the most vulnerable in the Borough. The local community

cannot be expected to support developments that will do nothing to address the Borough's lack of truly affordable housing.

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

Members of Parliament, London Assembly Member and Councillor Representations

6.16 Rt Hon Theresa Villiers MP: Member of Parliament for Chipping Barnet

6.17 Objection to the proposals for the following reasons:

- Object to plans by the Mayor of London and TfL to develop the Arnos Grove station car parks because of the impact they will have on the surrounding area.
Parking
- The loss of the passenger car park will cause huge inconvenience for commuters.
- Many suburban tube stations have car parks to reflect the fact the network is more spaced out in the suburbs than it is in inner London and most people live beyond walking distance from their nearest station.
- These car parks are an important part of the public transport network and encourage people to take the tube into London rather than drive.
- Getting rid of 'park-and-ride' facilities at suburban stations will undermine efforts to encourage modal shift from car to train rather than encourage it.
- The proposed development is a car free scheme, except for 6 blue badge spaces and 10 LUL staff car parking spaces on site.
- There is no reliable way for TfL to stop the new residents from buying cars. The combined impact on the surrounding area of the loss of 297 commuter parking spaces and 162 new households with no off-street parking will be massive.
- There will be very serious problems with overspill parking in residential streets most of which are already under pressure from parked cars.
- The loss of the car park will also cause great inconvenience for people using the station in the evenings and at weekends to head into the centre of London for shopping or leisure, or to visit friends and family. This will be felt particularly keenly by the elderly or others with limited mobility. The ability to drive to your local station and park has been an important part of life in the suburbs for decades and removing it will severely undermine quality of life. It will mean many residents, particularly the elderly, will find it harder to use the public transport network with the result that this application will cause greater social isolation.
- Understand Arnos Grove already has a significant problem as a commuter drop-off point, the result of which is the blocking of buses seeking to enter the station forecourt and causing traffic jams along Bowes Road. This is likely to increase and so lead to more congestion in the area.
Housing
- Deeply worried about the height and density of this development. I do not believe that the buildings proposed would be consistent with the character and housing density of the surrounding suburban neighbourhood.
- The height, density, scale, massing and bulk of this plan is far too great for the location. This is clearly and overdevelopment.
- The plans also provide inadequate outdoor space. The greatest housing need in the suburbs is for family homes with gardens but none are provided in this flat-only development.
- The visual impact of the buildings proposed would be very significant. Arnos Grove station is an iconic building, designed by the celebrated architect, Charles Holden. The blocks TfL want to build would do very serious damage to

the visual setting of the station and undermine its Grade II Star Listed status. The circular ticket hall is described in Pevsner's Buildings of England as having "great repose and dignity" and the author commends its "simple geometric forms". One of the principal reasons for the listing on Historic England's website is because the station is of architectural interest with its striking design and prominent circular booking hall providing an effective landmark. Allowing TfL to go ahead with the blocks of flats proposed should be turned down on conservation grounds alone.

Infrastructure

- There would be a significant impact on local services and infrastructure if 162 new flats are built at Arnos Grove.
- TfL have not made any kind of convincing case that local roads and services could cope. Additionally, I have been informed that the GLA have indicated that London's water supply is close to capacity and there are likely to be supply problems by 2025 and serious shortages by 2040. I understand that at a recent planning meeting in Enfield, Thames Water opposed a planning application for Meridian Water on the basis of water capacity issues. Allowing dense developments of this kind could intensify pressures on a limited water supply.

6.18 Rt Hon Bambos Charalambous MP: Member of Parliament for Enfield Southgate

6.19 Objection to the proposals for the following reasons:

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

6.20 Joanne McCartney AM London Assembly Member for Enfield and Haringey

6.21 Writing regarding the proposed development and concerns that residents have raised.

- Writing to you regarding the proposed development at Arnos Grove station and the concerns that residents have raised with me.
- There are real concerns over the loss of parking spaces and that this will reduce the number of people using public transport. Instead people may stay in their cars and drive longer distances, thereby increasing congestion. There is concern that commuters will still drive to the station even if the car park is removed, thereby displacing parking to nearby residential streets.
- There are also safety concerns in respect of 'the last mile home', especially for elderly residents who use the station car park to park and ride into central London, and who may not feel safe when returning at night, even if there is only a short walk to their homes.
- There is also a worry that there is not enough disabled parking provision provided in the scheme, meaning those residents who have mobility issues might not be able to travel if they cannot find a parking space - this should be reviewed.

- I would also ask the Committee to consider whether there is sufficient cycle parking in the proposals, and that such cycle parking is covered by CCTV

6.22 **Cllr Daniel Anderson (LB Enfield)**

6.23 Objection to the proposals for the following reasons:

The proposed housing would be unaffordable to most Enfield residents:

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

Displaced parking onto residential streets:

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

Increased congestion on Bowes Road:

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

Bad for the environment:

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

Risk Arnos Grove Station's iconic status:

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

Consultation/Planning Application process, particularly during Pandemic

- Object to the progression of this controversial development during the height of a pandemic. Many of those car park users likely to be impacted by the development are presently, like many working from home, and will, therefore, be unaware of the planning application.
- *Online petition is referenced:* <https://www.change.org/p/sadiq-khan-let-s-stop-tfls-proposed-development-of-the-carparks-at-arnos-grove-station>

6.24 **Cllr Laithe Jajeh (LB Barnet)**

6.25 Objection to the proposals for the following reasons:

- Overshadowing and ruining a Grade 2* listed building
- Seven stories is an over development of the site and inappropriate in the low rise surrounding area
- The displacement of parking will cause huge issues on surrounding streets and spill over into Barnet, particularly badly thought out when as we have seen in recent months that if public transport capacity is reduced, cars are essential in a suburban area like ours and people won't necessarily be able to take buses to get to the station
- Increase in congestion on Bowes Road, which already suffers from traffic log jams
- Lack of truly affordable housing and all short-term tenancies

6.26 **Cllr R Weeden Sanz (LB Barnet)**

6.27 Objection to the proposals for the following reasons:

- Plans to build towering 7 story edifices are totally inappropriate being next to a Grade 2 listed station which they will totally overshadow and dominate. It will be a devastating act of cultural vandalism and ruin an iconic piece of local heritage.
- More importantly though, the loss of parking spaces is particularly badly thought out at a time when the global pandemic has shown us that we cannot always rely on public transport and how vital car use is in a suburban area like that surrounding Arnos Grove. Especially when capacity on buses, the tube and rail is limited and may be restricted again in the event of a second wave happening in the future or even future pandemics. The plans would cause immense parking problems with the users of the almost 300 parking spaces that are disappearing having to find elsewhere to park which would affect not just surrounding roads in Enfield but also in neighbouring Barnet. It is unacceptable that there hasn't been any discussion with Barnet Council of the development given the impact it will have on the community in this borough as well where there are no CPZs and no plans to introduce them.
- It is outrageous TfL and Grainger plc are pushing ahead with this application. We are still yet to see the repercussions of Covid-19 which is going to result in a rethink of how we as a society operate and will have huge implications on planning policies which are now based on out of date assumptions. We need to pause and wake up to the new reality.
- 162 units are an overdevelopment of this small suburban site, and the plans are unsuitable on account of their bulk and mass in an area of low-rise buildings. This development does not improve the local area or provide additional amenities, in fact it will stop New Southgate and the neighbouring areas being a desirable place to live. The area will simply not be able to cope with the additional traffic and congestion.
- The committee should, in their wisdom, reject the plans.

The following local groups/societies made representations

6.28 **Better Streets for Enfield** (summary)

6.29 Support the proposals for the following reasons:

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

- Enfield needs affordable homes, but it also needs clean air and healthy, people-friendly streets.
- Reducing unnecessary car journeys and prioritising active travel and public transport are the way forward.
- According to TfL's display at the consultation, the current car park has been generating over 800 car trips per day on local roads, which could easily be replaced by public transport: a vast majority of car park users live within 960m of a station or 640m of a bus stop serving Arnos Grove. (Blue badge holders will still be able to park.) Reducing car trips will ease congestion, benefitting bus and emergency services, as well as people walking or cycling.
- Better cycle infrastructure connecting the station to the rest of the borough is requested.
- The development will also provide a new public square, helping to improve the public realm in Arnos Grove to the benefit of other residents and visitors.
- Please ensure that this sustainable development is approved.

6.30 **Bowes Road Resident Group** (summary)

6.31 A petition was submitted to Officers in June 2020 (signed by 33 residents). The petition was undertaken prior to submission of the applications and is dated 21 November 2019. The 21 November 2019 petition was submitted again in late November 2020. The petition was submitted to ward Councillors and the Applicant.

6.32 Object to the proposals for the following reasons:

- The proposals will increase circulating traffic on Bowes Road and surrounding streets, increase pollution, noise disturbance and adversely affect pedestrian and cyclist safety.
- The interests of the developers are being put before residents.
- Recent major residential developments near the Homebase Depot site and on the A406 has already damaged the environment and quality of life for residents of Bowes Road. This development will add even more people to the population which means local infrastructure and services will be further over-stretched.
- Traffic along Bowes Road is very heavy and fast moving outside rush hours between the station and the A406. Air pollution and noise have got substantially worse over recent years and pedestrian and cyclist safety is deteriorating significantly.
- The loss of the station car parks will increase car movements along Bowes Road as these displaced cars seek alternative parking and people drive to the station to drop off travellers.
- The problems along Bowes Road are recognised in the submitted 'Transport Assessment Final Document' – where references are made to accident data for the past five years.
- The submitted 'Transport Assessment Final Document' states that locations to the east of the site '*could benefit from improved pedestrian crossing facilities, or measures to reduce traffic speeds along Bowes Road*'.
- If these proposals are to be supported by the Council, it is imperative that a crossing at the library/clinic/swimming pool is provided on Bowes Road to mitigate residents' concerns about safety for pedestrians and cyclists. There is also a need to provide traffic calming to reduce the speed of vehicles. Crossing the road to these facilities is very dangerous at the moment and will get worse as a result of this application.

6.33 **Conservation Advisory Group** (major recommendations)

6.34 Comment on the proposals as follows:

6.35 Following a full presentation from the Applicant, the Conservation Advisory Group made three major recommendations. These recommendations are set out below.

- The architecture is satisfactory subject to approval of materials.
- The bus interchange (in its current dilapidated state) would be a major detraction from the visual benefits of the development. The applicant stated, to CAG, "*we will take this point away and discuss with our transport colleagues*". Nothing has changed.
- The easterly block is positioned, unattractively, at the back edge of pavement (unlike the westerly block which is positioned behind a proposed square). This creates an unreasonable disparity between the two sides of the development; both architecturally and socially.

6.36 Officer comment: Officers agree there is potential scope for improvement in respect of the bus interchange – which visually detracts from the benefits of the development. Some change will occur within this area as the development necessitates the reconfiguration of the existing bus stops/stands at the station and an indicative bus interchange design has been developed in consultation with TfL buses. There is scope for a specification to be agreed for s278 works. Officers consider it will be critical to secure samples and mock-ups (1:1 scale) in respect of materials and critical details – as well as obligations securing retention of the scheme architect to secure design quality. Conditions and Section 106 obligations have been recommended. Comments in respect of Block B01's southern alignment are considered in detail in the assessment section below.

6.37 **Cockfosters Local Area Residents Association** (summary)

- London Borough of Enfield (LBE) Planning Committee should reject the application.
- The LBE would contravene the Equality Act 2010 (the Act) if it approves it. If the Committee approves this application it will have acted positively to worsen the life chances of LBE residents and others within those statutorily protected characteristics.
- The Planning Committee must also note that the percentage of truly affordable units offered in the Application is 12% not 40%. The Applicant has been disingenuous, and the Officers have not made this clear to the Committee.
- Section 149(1) of the Act imposes a duty on public sector authorities to eliminate discrimination and advance equality of opportunity for the benefit of those with protected characteristics. Section 149(3) imposes a Public Sector Equality Duty (PSED) requiring the London Borough of Enfield (LBE) to have 'due regard' to the need to 'advance equality of opportunity'.
- LBE must 'remove or minimise disadvantages' and 'take steps to meet the needs' of protected persons. The loss of the car park will do the exact opposite to the Act's requirements. The intended re-provision of the existing spaces and taxi provision does not even preserve the status quo. The protected characteristics of age and pregnancy and maternity have not been considered.
- The Equality Statement is simply a restatement of relevant sections of the Mayor's 'Intend to Publish London Plan' and the requirements of the Act.
- The PSED cannot be delegated. Even if Transport for London (TfL) had evidenced 'due regard', LBE must conduct its own due diligence.
- Para. 110(b) of the National Planning Policy Framework (February 2019) (NPPF) has not been addressed.
- The Officers have overstated the contribution of the proposed development towards satisfying the need for affordable housing.
- Of the 162 units proposed, only 19 (11.7%) will be at the London Living Rent level, 98 (60.49%) will be at market rent. 15 The application is conceded to be

at the very margins of financial viability. We believe that the tenure split has been dictated by this factor, not by the need to provide truly affordable housing for disadvantaged Enfield residents.

- Section 149(1) of the Act imposes a duty on public sector authorities to: (a) eliminate discrimination ... (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it.
- By virtue of s.149(3), this Public Sector Equality Duty (PSED) requires the London Borough of Enfield (LBE) to have 'due regard' to the need to 'advance equality of opportunity' between persons who share a relevant protected characteristic and persons who do not share it. LBE must: (c) remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic; (d) take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it. We are here concerned with the protected characteristics of disability, age, and pregnancy and maternity.
- The PSED is a positive duty, it requires action by Committee. The loss of the car park will do the exact opposite to the Act's requirements.
- Intended re-provision of the existing 6 Blue Badge spaces and taxi provision does not preserve the status quo. Without the car park, it will not be possible for Blue Badge holders to plan a journey with any expectation of being able to park at the Station. To all intents and purposes the re-provision will be useless. It is not the positive action to 'eliminate discrimination' and 'advance equality of opportunity' required by the Act.
- 'Improving access' and promoting 'feelings of increased community safety' are irrelevant to the Duty.
- Blue Badge provision predates the extension of the Blue Badge Scheme to those with hidden disabilities, the current provision of six spaces is almost certainly inadequate and possibly contrary to law. An opportunity, to increase the provision in line with the protection the Act requires must not be missed.
- The protected characteristics of age and pregnancy and maternity have not been considered in the Officers' Update. Such characteristics are not of themselves entitlement to a Blue Badge but the Act requires the characteristics to be protected. Indeed, by highlighting the alternative step-free access at Oakwood Station, even though its car park is half the size of that at Arnos Grove, the Officers comes close to stating that disabled people and possibly the aged and women who are pregnant or on maternity should not use the Station. The development affords Enfield the opportunity to 'take steps' as required by the Act to enable them.
- 'Benefits and mitigations' are not, at law, 'countervailing factors' under the Act. If the Committee approves this application it will have acted positively to worsen, not improve, the life chances of LBE residents and others within those statutorily protected characteristics.
- The Enfield Transport User Group raised equality concerns with LBE in their submission. These matters have not been addressed in the Report.
- The duty imposed on a public authority cannot be delegated.
- Even if Transport for London (TfL) had evidenced 'due regard' during its involvement with Connected Living London – we know of no evidence that it has other than the Officers' last minute assurance – LBE cannot rely on that evidence without first conducting its own due diligence. Note that the Act provides a simple procedure to evidence 'due regard': an Equality Impact Assessment (EIA). There is no duty to complete an EIA but given the clear breach of s.149 that would result from the grant of planning permission, it is surprising that Officers do not appear to have considered the efficacy and benefit of completing one.
- Welcome commitment of both LBE and the Mayor of London to provide truly affordable housing in the local area, particularly for key workers.

- We do not doubt the Officer's statement that 'approximately 56,000 Enfield households could be eligible to access the affordable element'. We also recognise the particular need to provide affordable 3-bed units.
- However, the Officers have reported in a way that misleads the Committee into thinking that the contribution of the proposed development to satisfying the need for affordable housing is greater than it actually is. The Mayor has stated affordable housing to be 'truly affordable housing', defined as, amongst other things, accommodation at a London Living Rent (LLR). We assume that the members of the Committee support this definition: see also the Report para. 8.3.39. We totally commend the Mayor's straightforward and easily quantifiable definition of 'truly affordable housing'. The true position is summarised in the table in para. 8.3.40. Of the 162 units, only 19 (11.7%) units will be at LLR levels whilst 98 (60.49%) will be at market rent. The remaining 27.8% will be discounted but almost certainly not by a sufficient amount to make them affordable to the Enfield residents who most need them. (Note that the proposal would contribute only four units to the most acute demand: 3b5p.) Para. 2.11 states that 40% by habitable room must be affordable. It then specifies the tenure mix: 30% LLR and 70% discounted market rent. Thus, since none of the planned 162 units will be council-owned or 'part-rent-part-buy' (the Mayor's other criteria for truly affordable housing), only (40% x 30% =) 19 (12%) by habitable room will meet the mayor's own criteria. Therefore, only 0.00033% of the needs of the 56,000 households' cited in the Report can be met by the development. The Report simply repeats the Applicant's figures, it does not critically exam them.
- The proposed Scheme is conceded to be on the very margins of financial viability. We believe that the tenure split has been dictated by this factor, not by the need to provide truly affordable housing, particularly given that TfL's majority partner in Connected Living London is a private sector developer.
- It follows that the primary beneficiaries of this Report and the grant of planning permission will not be Enfield residents, such as key workers and others with genuine and pressing housing needs, but the operation of TfL and the profits of a private sector property developer. LBE and its residents will undoubtedly contribute directly or indirectly to these profits.
- Given the above, and because we do not see scope for the matter to be remediated – either at law under the Act, or financially on a viability basis – the application should be rejected outright and permission to revise the proposal refused. At the very least it should be deferred until the Committee is provided with the full and accurate account of the facts. Approval of the Application would be subject to a possible review by the Equality and Human Rights Commission as being a clear breach of the Equality Act 2010.

6.38 **Enfield Society** (summary)

6.39 Supports the proposals for the following reasons:

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

6.40 Officer comment: Conservation Advisory Group comments are set out above. A request has been received to clarify the 3 x main recommendations made by the group when it commented on the scheme.

6.41 **Enfield Town Residents Association** (summary)

6.42 Enfield Town Residents Association (ETRA) is a community organisation representing households in the centre of Enfield Town. The ETRA submitted an objection in June and again in November 2020.

6.43 Object to the proposals for the following reasons:

- The proposal to remove the car park at Arnos Grove will severely impact ETRA members' ability to travel around London conveniently.
- Enfield is an outer London borough, with a far poorer selection of travel options available than those who live in inner London; for residents in the inner London boroughs walking or cycling to a station is more feasible than for Enfield residents, especially given that our population profile has a large elderly contingent. For many Enfield residents the car is not an option, it is a necessity.
- These proposals, if approved, will effectively end Enfield residents' ability to conveniently access frequent public transport services and will lengthen journey times significantly for our members.
- There is no immediate, direct access to the underground system from Enfield Town.
- ETRA members use Arnos Grove station because it provides direct access to the Piccadilly Line, providing quicker access to the west of London than via the two local overground stations.
- Overground services are infrequent, providing a half-hourly service out of peak hours. Such long delays compare very unfavourably with the turn-up-and-go service available on the underground. This is one of the key reasons for wishing to retain direct access to Arnos Grove station. The objection notes that one elderly woman stated '*If we could not park at Arnos Grove I would not think of using the station. How would you get there? It would be very frustrating and time consuming*'.
- Alternative routes are a combination of indirect, significantly more time consuming and less attractive – particularly for older people in bad weather or at night. As a minimum, alternative options increase journey times by 20 minutes.
- For those who cannot walk that distance and do not have a bus route that passes conveniently close to their home, the only option would be a taxi or mini-cab. This would be around a £10 fare from Oakwood or Southgate, but more from Arnos Grove. Again, this involves significant increase in cost as well as journey time and hence inconvenience for residents to provide profits for TfL.
- London Borough of Enfield MUST insist that parking for commuters and residents using the station is retained in some form – whether multi-storey or underground, there HAS to be parking retained as part of the scheme.
- It is not enough to point to the proposed blue badge parking provision. Many people are frail, vulnerable and/or simply not capable of walking as far as the Mayor believes, but at the same time would not qualify for a blue badge.
- Key consideration under the Public Service Equality Duty (PSED) have not been addressed. The proposed development at Arnos Grove will have a serious and detrimental impact on those who should, by rights, be protected under the provisions of the Equality Act 2010, making it far more difficult for them to access the station.
- Equality implications have not been properly assessed or taken into consideration and there any statement of how these impacts might be mitigated.

- No consideration and analysis of obligations under the Equality Act and in particular the PSED in considering the differential and exceedingly negative impact on 1) older people, 2) , and 3) those people with mobility impairments who do not possess a blue badge (but who might make use of the TaxiCard scheme, for example) that can be predicted to arise from any decision to approve this proposal as it stands. All of these groups should expect special consideration and protection under the Equality Act 2010.
- There is no reference to a predictive Equality Impact Assessment having been carried out.
- It is important that people throughout Public Sector organisations (PSOs) be aware of their duty.
- Residents' and community groups (and individual residents) having raised this point.
- Transport for London is also included in Schedule 19 of the Equality Act, hence is subject to this requirement, and hence likewise appears to have been derelict in its duty in failing to consider the implications of the sale of this key accessibility asset on vulnerable residents.

6.44 **Enfield Transport User Group (ETUG) (summary)**

6.45 Object to the proposals for the following reasons:

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

6.46 **Federation of Enfield Residents & Allied Associations (summary)**

6.47 Object to the proposals for the following reasons:

- The Federation rejects the proposals outright and invites all councillors to exercise judgement in favour of leaving the station car park open to fulfil its original and superior function as a travel and community asset.
- Our view is based not just on the dense build proposed, the over weight of small one bed units, the restrictions imposed by the unsuitable site, the intrusive elevations. We also have regard to the strategic implications of

seriously damaging access to an important travel amenity for many thousands, further propagating tower cities of the future across the borough, a trend with serious social consequences if not halted.

- The existing 297 general car parking spaces will be abolished and not replaced, so stifling access to the station, decanting commuter parking into the neighbourhood and to other stations, increasing commuter mileage whilst seriously impeding community use of the station. Commuters not able to park will divert elsewhere. This is a serious negative consequence of closing the car park.
- No passenger drop-off will be provided at the front of the station, so all travellers with luggage, families with young children, infirm passengers and people with special needs will have no means of easy access to the station, nor to being picked up on arrival. All vulnerable groups, nurses, emergency and service staff, and shift workers who seek the security of their cars to access the station at all hours will be discarded. Drop-off could be provided but TfL abuses the public by insisting cars are not used.
- Space for blue badge parking will be nugatory, as good as none, for travellers and residents alike. The site just does not have sufficient space for protected travellers, which is of course discriminatory, inhumane and of arguable legality.
- Living at this development will be beyond the reach of average incomes, even with "affordability" concessions, so will exclude most service personnel, educational and health staff, shift workers and small families. Trades persons operating from vans, an important sector, will not be able to reside there, having no space for secure parking of their tools of trade.
- The scheme does not speak to Enfield's social priorities. FERAA has argued vigorously against imposed government housing targets on grounds that the borough already has a large number of residents living in inadequate or temporary accommodation, our natural first priority. Enfield has its own assessments of needs which identify family accommodation as core to its programme, but this scheme does not fulfil any part of it. Housing requires to be directed to where need is concentrated, and this is not Arnos Grove; it is locations where work is available, community values are certain and housing costs are closer to incomes. West Enfield does not fulfil this specification, east Enfield does. We ask that our planning officers focus on better matching residents' needs with development proposals, rather than the reverse.
- The total available site space amounts to just 1.13 Ha, split in two parts over the Grade 2* underground station, a ridiculously small net area that allows virtually no facilities to support up to 400 residents.
- The density of build is extraordinary and unacceptable, caused by TfL's need to maximise yield from the site; social tensions are escalated when space is restricted and amenities few - the communal space here is nothing.
- The close proximity of the buildings to the railway is far from ideal. Views over the tracks are amongst the least desirable for any development. Noise, pollution and restriction in movement off site will degrade the living experience for sure.
- Enfield's precious heritage is at stake here. The borough is not overly blessed with feature buildings and focal points, but the Charles Holden station is one – distinctive, a character statement enhanced by time, if overlooked by TfL. We do not live by concrete and housing towers alone but by a mixture of features enhancing the built environment.
- The case for ever more building is unending, political, and pursued without limit. The noise surrounding house build numbers is particularly intense. Consider the facts; new house build across England in 2018-19 was 213,859 a rise of 9.2% on the previous year, following 5 years of continuous growth (source HMG) The UK population has not expanded at this rate, but homes for investment is assuming increasing prominence driving up market values, putting the cost of living further out of reach for the bottom 20% of society, particularly in the metropolitan area.

- "Affordable housing" is planned at 40% of rooms but let us unpack the meaning of this claim. Affordable comes at a cost that is paid for by open market renters, but it can also fall on the provision of amenities to make these compact high elevation schemes liveable. In the case of Arnos Grove the very small land area available combined with the high affordability % enforced has led to virtually no communal facilities and far too little for community infrastructure. We are not persuaded that the notional common areas on the sites are anything but token offerings. Unfortunately, "affordability" has become a dog whistle to planners and separated from market realities.
- We look to our planners to shape and protect our built environment but if they moderate such schemes, the effect is indiscernible. To claim that Arnos Grove is supported by the Local Plan is without foundation in fact. The present plan, which remains our legal plan, was never constructed to permit removal of assets such as station car parks, and if some elision in the wording has been evoked to give glancing support to this scheme, how deplorable for the sanctity of principled administration.
- **Conclusion:** This scheme is a porker, without redeeming merit, and it is deeply disappointing to find as yet no support for rejection by our council professionals.

6.48 **Southgate Green Association on Behalf of Southgate Green Study Group (summary)**

6.49 Generally, in agreement with the proposals, with the following reservations:

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

Update:

- The bus interchange and bus stops should be included in any assessment, because the number of bus shelters and street furniture, pedestrian crossings etc all impacted on the significance of the listed station.
- Comments previously made in respect of drop-off for cars and taxis still stand. While restrictive aspirations of car ownership might apply to future occupiers of this site, transport hub users shouldn't be disenfranchised as a consequence.
- Block B01 remains dominant in the street scheme, and noticeable with the addition of gates.
- Suggest that the A3 unit classification should be widened to accommodate nursery school and community use. Question how existing mini-buses services

for residents- will be accommodated (run by the Friern Barnet old Hospital site (Princess Manor). - Comments in respect of views from Arnos Park and Pymmes Brook, near Waterfall Road still stand – the building will dominate the skyline. The arches are locally listed, and no views have been submitted.

- Question lack of parking for family housing – and staff parking, which was understood to be retained.
- Do not support the new high panel fence, which is not considered to be an improvement. Concerned that Holden’s design will be diminished by the area of high fencing proposed

6.50 Officer comment: As set out above, Officers agree there is scope for improvement in respect of the bus interchange – which visually detracts from the benefits of the development. Officers have further considered the impact of the interchange in the assessment section below. Officers agree that provision should be made in respect of passenger taxi drop-off, and generally in respect of drop-off arrangements. Officers have secured re-provision of the 2 no. existing Transport for London taxi drop-off bays. Officers have also secured a commitment from the Applicant to work with the council to provide a drop-off location following closure of the existing car park, and during the construction phase. This would be monitored during the construction period – and would be subject to a future decision on arrangements. The obligation would be secured by Section 106 agreement and include a cascade mechanism. Officers have considered the relationship of the southern façade of Block B01, relative to the station building, Arnos Arms, back of footway and kerblines – assessed in detail below. In respect of the suggestion that the A3 unit use classification should be widened to accommodate nursery school and community uses Officers note the changes to the Use Classes Order which have come into force – including introduction of new Use Class E. The Townscape and Visual Impact Assessment submitted in support of the applications includes views from Arnos Park – and these are assessed in detail below. The residential element is a ‘car-free’ scheme (except blue badge spaces) – the robustness and credibility of this approach, at this location, is assessed in detail below.

Internal

- 6.51 *Economic Development:* No comment
- 6.52 *Environmental Health Team:* No objection raised. Conditions pertaining to contaminated land and air quality required.
- 6.53 *Infrastructure Planning:* No objection raised however are seeking financial contribution within the scope of the s106 to mitigate the estimated impact arising from additional child places that will be needed
- 6.54 *Housing Renewal:* No comment
- 6.55 *Highways Team:* No comment
- 6.56 *Parks Team:* No comment
- 6.57 *Regeneration Team:* No comment
- 6.58 *SuDS/Flooding/Drainage:* No objection subject to conditions requiring Sustainable Drainage Strategy (pre-commencement other than for Enabling Works) and Verification Report.
- 6.59 *Traffic and Transportation Team:* No objection.

- 6.60 *Waste Management*: No comment.
- 6.61 *Energetik*: Discussions are ongoing between the applicant and the Council's District Heat Network (DHN) setup company 'Energetik' with the intention of confirming that the development will link up to the network (noting that the development has been designed to be able to do so). Should a connection to the DHN prove unfeasible and/or unviable the applicants will move to their reserve strategy (as outlined in the planning application) which assumes an Air Source Heat Pump based solution.

Statutory and Non- Statutory Consultees

- 6.62 *NHS London Healthy Urban Development Unit: response on behalf of North Central London Clinical Commissioning Group*: The development will have an impact on local healthcare services, particularly primary healthcare services and infrastructure. There are three GP practices within 1 mile of the site in Enfield with the closest practice, Arnos Grove Medical Centre 0.2 miles away. The other two GP practices are the North London Health Centre and Grovelands Medical Centre. The three GP practices are operating at capacity, with a combined ratio of 3,469 registered patients to one FTE GP, which exceeds the recommended benchmark of 1:1800. The Council's Section 106 Supplementary Planning Document (2016) advocates the use of the Healthy Urban Development Unit (HUDU) Planning Contributions Model to calculate a s106 contribution to help mitigate the impact of the development. The Healthy Urban Development Unit Planning Contributions Model calculates a primary healthcare capital requirement of £70,595. It is envisaged that the s106 contribution would be spent on increasing the capacity of local GP premises, or contribute to the provision of a new facility in the area as supported by Policy NC Policy 5 of the North Circular Area Action Plan (October 2014). This would meet the tests in Community Infrastructure Levy Regulation 122.
- 6.63 *London Borough of Barnet (Objection)*: The development would result in the removal of existing commuter car parks on the site and could, therefore, without mitigation result in an unacceptable impact on highway conditions within the London Borough of Barnet as a result of displaced commuter car parking. The proposal also fails to identify or propose any mitigation measures to account for the increased pressures, for example on school places, that would be likely to result on key infrastructure within the London Borough of Barnet.
- 6.64 *London Fire Service*: No objection.
- 6.65 *London Underground Infrastructure Protection*: No objection, subject to the applicant fulfilling their obligations in terms of legal requirements.
- 6.66 *Metropolitan Police Service (Designing Out Crime)*: No objection subject to condition.
- 6.67 *Thames Water*: No objection raised.
- 6.68 *Transport for London (Planning)*: No objection raised.
- 6.69 *Historic England*: State that the Local Planning Authority is authorised to 'determine the application for listed building consent as you think fit'.
- 6.70 *The Secretary of State has considered the information and does not intend to require the application concerned to be referred to him.*
- 6.71 *Greater London Archaeology Advisory Service (GLAAS)*: No objection.

- 6.72 *Environment Agency: No objection.*
- 6.73 *Natural England: No objection.*
- 6.74 *GLA (Stage 1 response) (summarised):*

Principle of development: The proposal to introduce residential use to this underutilised site responds positively to London Plan and the Mayor's intend to publish London Plan policies to increase housing supply and optimise sites, which is supported.

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

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

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

Energy, water and urban greening:

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

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

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

DEN connection: The discussions with the DHN operator and the applicant are still on-going. Connecting to the proposed Arnos Grove district heating network would provide 51 tonnes CO2 savings per annum, being the essential part of

the energy strategy. Therefore, discussions with the operator should continue to demonstrate that the connection is being actively pursued. A condition on this should be applied.

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

6.76 *Design Review Panel*

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

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

Overall it was felt that the scheme had developed in the time between reviews and that the height and scale was appropriate for the surrounding context of low rise suburbia and shopping parade;

Entrance frontages that were flanked or primarily fronted with refuse stores and bike sheds were not supported as these created blank or inactive frontages;

The panel accepted that the constraints of the site meant the (previously proposed) gable end building along the street frontage was now absent from the scheme (since the last review) but accepted that the various requirements of the site meant it was difficult to deliver;

Blocks B01 and B02 felt more unresolved and the panel were not convinced by the massing strategy on B01 as it could be blocking views of the station drum from the Eastern approach. It was suggested to pull it back from the street in order to allow a better view of the drum;

The panel were not clear on the purpose of rear garden / entrance area of B02, i.e. private amenity or communal garden? There was also concern with the gating of the western street to enclose the TfL staff parking and the location of bike and refuse stores;

The panel encouraged the design team and client to continue pushing to create a new access route to Walkers Close to allow access to Arnos Park and at least safeguard a route on site both for pedestrians and for trackside vehicle access;

In relation to heritage overall the approach of consistent "background" buildings continued to be supported. The Panel also supported the principle of protecting the silhouette and shape of the drum by working to not place buildings behind it; and

Lastly, in relation to heritage the approach to materials was considered interesting with the potential to develop a unique and positive interpretation of the local palette of materials, the Holden style and art deco references noted.

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

7. RELEVANT POLICIES

- 7.1 Section 70(2) of the Town and Country Planning Act 1990 requires the Committee have regard to the provisions of the development of the development plan so far as material to the application; and any other material considerations. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning decisions to be made in accordance with the development plan unless material considerations indicate otherwise. This application is also subject to the heritage statutory provisions as set out in the agenda pack and heritage analysis of the report.
- 7.2 The London Plan: The Spatial Development Strategy for Greater London Consolidated with Alterations Since 2011 (March 2016) – referred as ‘the London Plan’; New London Plan – Intend to Publish Draft December 2019 - the New London Plan has progressed through Examination and the Mayor has sought its adoption despite a small number of unaddressed Panel Recommendations. Directions by the Secretary of State were issued on 13 March 2020 requiring modifications to the Intend to Publish version of the London Plan. The Mayor responded to the Secretary of State on 24 April 2020 and is seeking amendments to the modifications requested, before taking the statutory steps to finalise the Plan. Directions by the Secretary of State were issued on 10 December 2020. The LBE has an adopted Local Plan made up of several documents including: Core Strategy (2010); Development Management Plan (2014); North Circular Road Area Action Plan (2014); The LBE is now preparing a new Local Plan (2018-2036, referred to as the “New Local Plan 2036”) responding to updates to both national and London-wide planning policy which is currently under review following several rounds of consultation. LBE hopes to consult on the New Local Plan 2016 in Spring 2021. The LBE is also reviewing its tall building policy, which will be considered throughout the technical assessment.

The London Plan – Existing and Intend to Publish

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

The London Plan 2016

- 7.4 The London Plan is the overall strategic plan for London setting out an integrated economic, environmental, transport and social framework for the

development of London for the next 20-25 years. The following policies of the London Plan are considered particularly relevant:

Policy 1.1	Delivering the strategic vision and objectives for London
Policy 2.1	London in its global, European and United Kingdom context
Policy 2.6:	Outer London: vision and strategy
Policy 2.7:	Outer London: economy
Policy 2.8:	Outer London: transport
Policy 2.15	Town Centres
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
Policy 3.7:	Large residential developments
Policy 3.8:	Housing choice
Policy 3.9:	Mixed and balanced communities
Policy 3.10:	Definition of affordable housing
Policy 3.11:	Affordable housing targets
Policy 3.12:	Negotiating affordable housing on individual private residential
Policy 3.13:	Affordable housing thresholds.
Policy 3.14:	Existing housing
Policy 3.15:	Co-ordination of housing development and investment.
Policy 3.16:	Protection and enhancement of social infrastructure
Policy 3.17:	Health and social care facilities
Policy 3.18:	Education facilities
Policy 3.19:	Sports facilities
Policy 4.1:	Developing London's economy
Policy 4.7	Retail and Town Centre Development
Policy 4.9	Small Shops
Policy 4.12:	Improving opportunities for all
Policy 5.1:	Climate change mitigation
Policy 5.2:	Minimising carbon dioxide emissions
Policy 5.3:	Sustainable design and construction
Policy 5.5:	Decentralised energy networks
Policy 5.6:	Decentralised energy in development proposals
Policy 5.7:	Renewable energy
Policy 5.9:	Overheating and cooling
Policy 5.10:	Urban greening
Policy 5.11:	Green roofs and development site environs
Policy 5.12:	Flood risk management
Policy 5.13:	Sustainable drainage
Policy 5.14	Water quality and wastewater infrastructure
Policy 5.15:	Water use and supplies
Policy 5.16	Waste net self-sufficiency
Policy 5.17	Waste capacity
Policy 5.18	Construction, excavation and demolition waste
Policy 5.21:	Contaminated land
Policy 6.1	Strategic approach
Policy 6.3	Assessing effects of development on transport capacity
Policy 6.4	Enhancing London's transport connectivity
Policy 6.7	Better streets and surface transport
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 7.8	Heritage assets and archaeology
Policy 7.9	Heritage-led regeneration
Policy 7.11	London View Management Framework
Policy 7.13	Safety, security and resilience to emergency
Policy 7.14:	Improving air quality
Policy 7.15:	Reducing noise and enhancing soundscapes
Policy 7.18:	Protecting local open space and addressing local deficiency
Policy 7.19:	Biodiversity and access to nature
Policy 7.21:	Trees and woodland
Policy 8.1	Implementation
Policy 8.2	Planning obligations
Policy 8.3	Community infrastructure levy
Policy 8.4	Monitoring and review

Intend to Publish London Plan 2020

- 7.5 The Examination in Public (EiP) on the new London Plan was held between 15th January and 22nd May 2019.
- 7.6 On the 9th December 2019, the Mayor issued to the Secretary of State his intension to publish the London Plan. On 13 March 2020, the Secretary of State issued Directions to change a number of proposed policies – as identified by (*) in the list below. In line with paragraph 48 of the NPPF, the weight attached to this Plan should reflect the stage of its preparation; the extent to which there are unresolved objections to relevant policies; and the degree of consistency of the relevant policies in the emerging Plan to the NPPF.
- 7.7 Whilst the London Plan (2016) remains, given the advanced stage that the Intend to Publish version of the London Plan has reached, the emerging document holds significant weight in the determination of planning applications (although there is greater uncertainty about those draft policies that are subject to the Secretary of State’s Direction.
- 7.8 The following London Plan (Intend to Publish) policies are considered particularly relevant:
- GG1 Building Strong and Inclusive Communities
 - GG2 Making the Best Use of Land
 - GG3 Creating a Healthy City
 - GG4 Delivering the Homes Londoners Need
 - GG6 Increasing efficiency and resilience
 - D1 London’s form, character and capacity for growth
 - D2: Infrastructure Requirements for Sustainable Densities
 - D3: Optimising Site Capacity Through the Design-led Approach:
 - D4: Delivering Good Design
 - D5: Inclusive Design
 - D6: Housing Quality and Standards:
 - D7: Accessible Housing
 - D8: Public Realm
 - D11 Safety, Security and Resilience to Emergency
 - D12 Fire Safety

D13	Agent of Change
D14	Noise
E11	Skills and Opportunities for All
H1	Increasing Housing Supply (*):
H4	Delivering Affordable Housing
H6	Affordable housing tenure
H10	Housing Size Mix (*)
H11	Build to Rent
HC1	Heritage Conservation and Growth
G1	Green Infrastructure
G5	Urban Greening
G6	Biodiversity and Access to Nature
G7	Trees and Woodlands
S4	Play and Informal Recreation
SI1	Improving Air Quality
SI2	Minimising Greenhouse Gas Emissions
SI3	Energy Infrastructure
SI 4	Managing heat risk
SI5	Water infrastructure
SI6	Digital Connectivity Infrastructure
SI7	Reducing Waste and Supporting the Circular Economy
SI 8	Waste capacity and net waste self-sufficiency
SI12	Flood Risk Management
SI13	Sustainable Drainage
T1	Strategic Approach to Transport
T2	Healthy Streets
T3	Transport Capacity, Connectivity and Safeguarding
T4	Assessing and Mitigating Transport Impacts
T5	Cycling
T6	Car Parking
T7	Deliveries, servicing and construction
T9	Funding Transport Infrastructure Through Planning
DF1	Delivery of the Plan and Planning Obligations

Local Plan – Overview

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

Local Plan – Core Strategy

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

CP 1:	Strategic Growth Areas
CP 2:	Housing Supply and Locations for New Homes
CP 3:	Affordable Housing
CP 4:	Housing Quality
CP 5:	Housing Types
CP 9:	Supporting Community Cohesion
CP 17:	Town Centres
CP 20:	Sustainable Energy Use and Energy Infrastructure
CP 21:	Delivering Sustainable Water Supply, Drainage Sewerage Infrastructure
CP 24:	The Road Network
CP 25:	Pedestrians and Cyclists
CP 26:	Public Transport
CP 28:	Managing Flood Risk Through Development
CP 29:	Flood Management Infrastructure
CP 30:	Maintaining and Improving the Quality of the Built and Open Environment
CP 31:	Built and Landscape Heritage
CP 32:	Pollution
CP 34:	Parks, Playing Fields and Other Open Spaces
CP 36:	Biodiversity
CP 44:	North Circular Area
CP 45:	New Southgate

Local Plan - Development Management Document

7.12 The Council's Development Management Document (DMD) provides further detail and standard based policies by which planning applications should be determined. Policies in the DMD support the delivery of the Core Strategy.

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

DMD 1:	Affordable Housing on Sites Capable of Providing 10 units+
DMD 3:	Providing a Mix of Different Sized Homes
DMD 6:	Residential Character
DMD 8:	General Standards for New Residential Development
DMD 9:	Amenity Space
DMD1 0:	Distancing
DMD 28:	Large Local Centres, Small Local Centres and Local Parades
DMD 37:	Achieving High Quality and Design-Led Development
DMD 38:	Design Process
DMD 43:	Tall Buildings
DMD 44:	Conserving and Enhancing Heritage Assets
DMD 45:	Parking Standards and Layout
DMD 47:	New Road, Access and Servicing
DMD 48:	Transport Assessments
DMD 49:	Sustainable Design and Construction Statements
DMD 50:	Environmental Assessments Method
DMD 51:	Energy Efficiency Standards
DMD 52:	Decentralized Energy Networks
DMD 53:	Low and Zero Carbon Technology
DMD 54:	Allowable Solutions
DMD 56:	Heating and Cooling
DMD 57:	Responsible Sourcing of Materials, Waste Minimisation
DMD 58:	Water Efficiency

DMD 59:	Avoiding and Reducing Flood Risk
DMD 60:	Assessing Flood Risk
DMD 61:	Managing surface water
DMD 62:	Flood Control and Mitigation Measures
DMD 64:	Pollution Control and Assessment
DMD 65:	Air Quality
DMD 66:	Land Contamination and instability
DMD 68:	Noise
DMD 69:	Light Pollution
DMD 70:	Water Quality
DMD 71:	Protection and Enhancement of Open Space
DMD 72:	Open Space Provision
DMD 73:	Child Play Space
DMD 76:	Wildlife Corridors
DMD 77:	Green Chains
DMD 78:	Nature Conservation
DMD 79:	Ecological Enhancements
DMD 80:	Trees on Development Sites
DMD 81:	Landscaping

North Circular Area Action Plan

- 7.14 The North Circular Area Action Plan (NCAAP) sets out a planning framework for the sets out a planning framework for the future of the North Circular corridor between the A109 at Bounds Green and the A10 Great Cambridge Road. The adopted NCAAP forms an integral part of the Local Plan, sitting alongside the adopted Core Strategy (2010), the adopted New Southgate Masterplan (2010), the adopted Development Management Document (DMD, (2014), and other area based plans being prepared for Enfield's strategic growth and regeneration areas. The NCAAP provides more detailed and area-specific policy and framework for this part of the borough. New development proposals coming forward within the area are expected to accord with the policies and proposals unless other material planning considerations indicate otherwise. Of particular relevance to this application are policies NC Policies 2, 6, 8, 9 and 17 which are summarised as follows:
- 7.15 NC Policy 2 'New and Refurbished Homes' identifies 20 sites within the NCAAP area which have the potential to deliver approximately 1,400 new homes within the plan period up to 2026.
- 7.16 NC Policy 5 'Provision of Modern Healthcare Facilities' states that development of 10 residential units or more will be expected to contribute towards the provision of health facilities within the NCAAP area, and financial contributions will be calculated using the NHS Healthy Urban Development Unit Model.
- 7.17 NC Policy 6 'High Quality Design of New Development' states that new development within the NCAAP area will be high quality and design led...taking careful account of urban context and reinforcing local distinctiveness. In relation to Arnos Grove station the policy states that the character of the area is suburban and generally low to medium density and new development will have a significant impact on townscape and as such should have a design-led approach.
- 7.18 NC Policy 8 'Transport and Movement' in the NCAAP Area notes that Arnos Grove station has commuter parking either side of the station building, and these sites are identified for potential redevelopment. The policy further notes

that the suitability of these sites for redevelopment will depend on their role in providing commuter parking in this location.

- 7.19 NC Policy 9 'Environmental Mitigation – Air Quality and Noise Pollution' notes that in relation to air quality the design of new developments and their associated landscaping proposals can significantly help in the mitigation of environmental problems such as air and noise pollution.
- 7.20 NC Policy 10: Open Spaces states that new development should make appropriate contributions to improving the quality of the existing open space network across the NCAAP area.
- 7.21 NC Policy 12: Sets key Principles to guide change in the New Southgate / Arnos Grove neighbourhood place include: 1. Development sites – including Arnos Grove station land; 2. Townscape – development heights and forms to respect local character and context; 3. Activities – development will generally be housing led; 6. Infrastructure – the significant planned residential growth must be supported by appropriate contributions.
- 7.22 NC Policy 17 (Arnos Grove) sets out that the site has the potential to be released for redevelopment whilst also making clear that any new development would need to respect the setting of the listed building. The policy further notes that new development "should take account" of four criteria, including the site layout (Part 1) and the estimated site capacity (Part 4), but these are not absolute requirements.

Enfield Draft New Local Plan

- 7.23 Work on a New Enfield Local Plan has commenced so the Council can proactively plan for appropriate sustainable growth, in line with the Mayor of London's "good growth" agenda, up to 2041. The Enfield New Local Plan will establish the planning framework that can take the Council beyond projected levels of growth alongside key infrastructure investment.
- 7.24 The Council consulted on Enfield Towards a New Local Plan 2036 "Issues and Options" (Regulation 18) (December 2018) in 2018/19. This document represented a direction of travel and the draft policies within it will be shaped through feedback from key stakeholders. As such, it has relatively little weight in the decision-making process. Nevertheless, it is worth noting the emerging policy H2 (Affordable housing) which sets out a strategic target that 50% additional housing delivered across the borough throughout the life of the plan will be affordable; policy H4 (Housing mix) which identifies the borough's needs for homes of different sizes and tenures; and H5 (Private rented sector and build-to-rent) which sets out that the Council will seek to maximise the supply of housing in the borough by, amongst other things, supporting proposals for standalone build to rent developments.

National Planning Policy Framework (February 2019)

- 7.25 The National Planning Policy Framework (NPPF) introduces a presumption in favour of sustainable development. In this respect, sustainable development is identified as having three dimensions - an economic role, a social role and an environmental role. For decision taking, this presumption in favour of sustainable development means:
 - a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the

right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;

b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and

c) an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

7.26 The NPPF recognizes that planning law requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise. The NPPF does not change the statutory status of the development plan as the starting point for decision making.

7.27 In relation to achieving appropriate densities paragraph 122 of the NPPF notes that planning policies and decisions should support development that makes efficient use of land, whilst taking into account:

a) the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;

b) local market conditions and viability;

c) the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;

d) the desirability of maintaining an area's prevailing character and setting (including residential gardens), or of promoting regeneration and change; and

e) the importance of securing well-designed, attractive and healthy places.

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

National Planning Practice Guidance (NPPG)

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

Other Material Considerations and guidance

7.30 The following guidance is also considered particularly relevant:

Enfield Climate Action Plan (2020)

Enfield Housing and Growth Strategy (2020)

Enfield Intermediate Housing Policy (2020)
New Southgate Masterplan (2010)
Enfield Biodiversity Action Plan
Enfield Characterisation Study (2011)
Enfield Local Heritage List (May 2018)
Enfield S106 SPD (2016)
Enfield Decentralised Energy Network Technical Specification SPD (2015)
Making Enfield: Enfield Heritage Strategy 2019-2024 SPD (2019)
The Setting of Heritage Assets – Historic Environment Good Practice Advice in Planning: 3, Historic England (2017)
London Councils: Air Quality and Planning Guidance (2007)
TfL London Cycle Design Standards (2014)
GLA: Shaping Neighbourhoods: Play and Informal Recreation SPG (2012)
GLA: Shaping Neighbourhoods: Character and Context SPG (2014)
GLA: The Control of Dust and Emissions during Construction and Demolition SPG (2014)
GLA: London Sustainable Design and Construction SPG (2014)
GLA: Accessible London: Achieving an Inclusive Environment SPG (2014)
GLA: Social Infrastructure SPG (2015)
GLA: Housing SPG (2016)
GLA: Homes for Londoners: Affordable Housing and Viability SPG (2017)
Mayor's Transport Strategy (2018)
GLA Threshold Approach to Affordable Housing on Public Land (2018)
Healthy Streets for London (2017)
Manual for Streets 1 & 2, Inclusive Mobility (2005)
Report of the Examination in Public of the London Plan (2019)
National Design Guide (2019)

8. MATERIAL PLANNING CONSIDERATIONS

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

- Principle of Development (Land Use) – Section 8.2
- Housing Need and Delivery – Section 8.3
- Optimising site capacity – Section 8.4
- Housing Mix – Section 8.5
- Residential Quality and Amenity – Section 8.6
- Design – Section 8.7
- Heritage – Section 8.8
- Neighbouring Amenity – Section 8.9
- Transport – Section 8.10
- Trees – Section 8.11
- Water Resources, Flood Risk and Drainage – Section 8.12
- Environmental Considerations – Section 8.13
- Waste Storage – Section 8.14
- Contaminated Land – Section 8.15
- Air Quality / Pollution – Section 8.16
- Health – Section 8.17
- Education – Section 8.18
- Fire Safety – Section 8.19
- Equality Duty and Human Rights – Section 8.20
- Community Infrastructure Levy – Section 8.21
- Conclusion – Section 8.22

8.2 Principle of Development (Land Use)

- 8.2.1 In terms of the overarching principle of development the Planning and Compulsory Purchase Act 2004 and the Town and Country Planning Act 1990 seek to establish that planning decisions are taken in accordance with the Development Plan unless material considerations indicate otherwise.
- 8.2.2 Running alongside this is the aim that planning should facilitate the delivery of sustainable development. This is achieved by ensuring that the right development is built on the right land; that development helps to support communities with sufficient homes, accessible services, and open spaces; and development protects and where appropriate, enhances the natural, built and historic environment.
- 8.2.3 Paragraph 8 of the NPPF sets out three overarching objectives, in order to achieve sustainable development. These objectives are interdependent and need to be pursued in mutually supportive ways and include the following (with detail provided on the most relevant objective to this section): a) an economic objective; b) a social objective; and, c) an environmental objective –to contribute to protecting and enhancing our natural, built and historic environment.
- 8.2.4 With regards to the existing land use, it is noted that the NPPF (Para. 118) advocates the promotion and support the development of under-utilised land and buildings, particularly where this would help to meet identified needs for housing; where land supply is constrained; and where it is considered sites could be used more effectively.
- 8.2.5 Meanwhile paragraph 1.2.5 of the London Plan (Intend to Publish) notes that ‘all options for using the city’s land more effectively will need to be explored as London’s growth continues, including the redevelopment of brownfield sites and the intensification of existing places, including in outer London’. Furthermore, Policy GG2 requires development to prioritise sites that are well-connected by public transport, particularly for intensifying the use of brownfield land and delivering additional homes.

Comprehensive Redevelopment

- 8.2.6 The scheme proposes the redevelopment of the site, which comprises two existing car parks (Sites A and B). The existing car parks provide no architectural interest to the area nor do they contribute towards enhancing the Grade II* listed station and its setting.
- 8.2.7 The site is situated within the New Southgate Place shaping area and is also within the North Circular Area Action Plan Area (2014). The potential for development was set out in adopted Enfield development plan policy – specifically, within the North Circular Area Action Plan (2014).
- 8.2.8 The site is identified as an ‘opportunity site’ within the North Circular Area Action Plan (NCAAP), within NC Policy 2 (Opportunity Site 7).
- 8.2.9 NC Policy 17 also sets out that the site has potential to be released for redevelopment. The principle of development on this site is therefore supported. NC Policy 17 Arnos Grove Station states the site has potential to be released for redevelopment, and that new development would need to respect the setting of the Grade II listed station building, and that respecting the setting of the station could be achieved by setting the building line of new development back so that views from the local centre are not interrupted.

- 8.2.10 The policy provides indicative housing numbers and design options, which have been assessed in this report in the context of present-day considerations, adopted and emerging policies and other material considerations. The NCAAP pre-dates the current adopted London Plan (2016) and emerging London plan (ItP) housing targets.
- 8.2.11 This area is identified as a place shaping priority area / regeneration priority area. Core Policy 44 'North Circular Area', and Core Policy 45 'New Southgate' are relevant policy considerations. Enfield adopted Core Strategy (2010) Core Policy 44 North Circular Area states that the Council will promote housing improvements and investments. It recognises that housing estimates may need to be revised following further detailed work as part of the AAP and New Southgate Masterplan. The NCAAP indicates new development will be expected to cross-fund environmental improvements in the area such as landscaping and tree planting. Enfield adopted Core Policy 45 New Southgate sets out the objectives for this place shaping priority area. It indicates that a holistic integrated approach should be taken to development and that street based urban design solutions should be employed.
- 8.2.12 Objections have been received in respect of the proposed loss of the public car park (except blue badge provision). Objections have also been raised stating that the proposals are in conflict with the local plan and are not consistent with the New Southgate Masterplan. NCAAP Policy 17 established that the site has potential to be released for redevelopment. The supporting text to the policy also acknowledges this potential loss, stating that:

'if redevelopment would result in a reduction in the provision of public parking at this key interchange a clear justification for this loss would be required. That said, it is noted that a reduction in car parking would align with the policy direction of the Mayor's London Plan and transport Plan in terms of encouraging travel by sustainable modes of transport'.

- 8.2.13 In this respect, the principle of the loss of public car parking at this location has been established in adopted development plan policy. The weight of NC Policy 17 (Arnos Grove Station – Site 7) is greater than that of the guidance within the New Southgate masterplan (considered in further detail below).
- 8.2.14 The principle of the development is acceptable subject to further detailed assessment below an appropriate suite of conditions and planning obligations.

Residential Use

- 8.2.15 The benefits of delivering housing on an underutilised brownfield site in a highly accessible location (directly adjacent to a tube station), partially within and directly adjacent to a designated local centre (Arnos Grove Local Centre) has strong planning policy support and should be afforded substantial weight in the determination of the application. The site is uniquely situated directly adjacent to a tube station – providing a robust case for a car-free development.
- 8.2.16 With specific regard to the residential element of the proposal, it is noted that the NPPF sets out the government's objective to boost the supply of homes. The NPPF also states an intention to ensure that supply meets the needs of different groups in the community, including an affordable housing need. Policy GG4 of the draft London Plan supports this intention, stating that planning and development must 'ensure that more homes are delivered'.

- 8.2.17 Policy H1 of the draft London Plan (ItP) notes the importance of encouraging residential development on appropriate windfall sites, especially where they have a high PTAL rating (ratings 3 to 6) or are located within 800m of a tube station. The Council's Core Strategy (4.1 Spatial Strategy), identifies that sustainable locations for development would be concentrated in town centres, on previously developed land and that new homes will be planned through the intensification of land uses.
- 8.2.18 The Mayor's Affordable Housing and Viability SPG sets out the intention to bring forward more public land for affordable homes. Paragraph 4.4 of the SPG outlines the benefits of Build to Rent (BtR) developments noting these: attract investment into London's housing market that otherwise would not be there, particularly since Build to Rent is attractive to institutional investors seeking long-term, inflation-tracking returns; accelerate delivery on individual sites as they are less prone to 'absorption constraints' that affect the build-out rates for market sale properties; more easily deliver across the housing market cycle as they are less impacted by house price downturns; provide a more consistent and at-scale demand for off-site manufacture; offer longer-term tenancies and more certainty over long-term availability; ensure a commitment to, and investment in, place making through single ownership; and provide better management standards and higher quality homes than other parts of the private rented sector. Build to Rent is considered in greater detail below.
- 8.2.19 NPPF (Paragraphs 102 and 103) sets out objectives for considering transport issues in the planning process, including ensuring opportunities to promote walking, cycling and public transport, and requires development be focused on locations which are sustainable and can offer a range of transport modalities to help reduce congestion and emissions and improve air quality and public health. The development site is in a highly accessible and sustainable location, immediately adjacent to an underground station with a bus interchange immediately at the front of the site.
- 8.2.20 The proposal is for 162-residential units on a site where the adopted development has identified potential to introduce new housing (NCAAP). The Borough's housing delivery targets have been set by the GLA and the Draft London Plan states that Enfield is required to provide a minimum of 12,460 homes over the next 10 years (1,246 per annum), in comparison to the previous target of 7,976 for the period 2015-2025.
- 8.2.21 According to the Enfield Housing Trajectory Report (2019), during the previous 7-years the Borough has delivered a total of 3,710 homes which equates to around 530 homes per annum. Furthermore, given the new target of 1,246 per annum the borough needs to optimise all options in terms of housing delivery, particularly on existing brownfield sites and transport hubs, as is the case here.
- 8.2.22 The Council is currently updating its Local Plan and through publishing the Issues & Options (Regulation 18) last year has been transparent about the sheer scale of the growth challenge for Enfield. The published Regulation 18 document was clear about the need to plan differently to attain a significant step change in delivery and secure investment in our borough. The council needs to encourage a variety of housing development including market, affordable and Build to Rent products, as is proposed here, in order to meet varied local demand.
- 8.2.23 In terms of national policy, the provision of housing on underutilised brownfield sites in highly accessible locations is in line with the NPPF principles in respect of sustainable development (social, economic and environmental).

This approach is also in line with the adopted and draft London Plan which supports the optimisation of underutilised and highly accessible brownfield sites. It is also aligned with a plan-led approach to directing density and scale to sites where new resident populations can most sustainably be supported.

- 8.2.24 In relation to sustainable development the proposal is considered to respond to the objectives of the NPPF by redeveloping a brownfield site; by providing homes that are highly accessible (directly adjacent to a tube station) and easily accessible to local amenities; by providing a range of housing to support a mixed and balanced community; and by having due regard to the local natural, built and historic environment. It is also considered that the proposed number of residential units on the site would contribute to providing housing to assist in meeting the borough's housing target and help bridge the shortfall that has been the case in previous years.

Loss of the existing car park / introducing a compatible use

- 8.2.25 The loss of the existing car park (Sites A and B) is a planning consideration in the assessment of the proposal. This is by virtue of the proposed change in land use, which as set out above has been established – and in consideration of impact on existing users of the car park. Adopted and emerging Development Plan policies encourage sustainable travel in locations with excellent public transport links, such as the application site. The existing car park incentivises unsustainable travel behaviours (private car use), contrary to adopted and emerging Development Plan transport policies. The loss of the car park is supported by Officers.
- 8.2.26 Analysis of objections received (from the public and neighbours) indicates that a proportion of objectors highlight impacts that currently arise on local amenity, within Arnos Grove – which are attributed to use of the existing car park. Existing impacts include congestion, traffic, pollution, nuisance and noise.
- 8.2.27 Further analysis of objections (received from public and neighbours who provide a postcode) indicates that approximately 79.7% of those objecting have provided a postcode (likely home address) located 10 minutes or less walking distance from an Underground Station or Overground Station or National Rail train station. Almost 50% are within 5 minutes or less walking distance from an Underground Station or Overground Station or National Rail train station. Analysis of the representations received supports the view that a substantial proportion of residents and existing car park users live in locations where alternative sustainable travel options are available. The loss of the car park would result in Enfield's residents being able to undertake their journey's by public transport or other sustainable modes / active travel options.
- 8.2.28 The Applicant has carried out comprehensive surveys of the use of the existing car park and concluded that most drivers have alternative forms of public transport available to them (See Section 8.10). The proposed site adjoins a tube station and bus interchange and as such, as indicated above makes it a sustainable place to live.
- 8.2.29 As mentioned above, in terms of national policy the provision of housing on underutilised brownfield sites in highly accessible locations and to increase densities, is a key driver within the NPPF particularly where this would help to meet identified needs for housing; where land supply is constrained; and where it is considered sites could be used more effectively. This approach is also in line with the draft London Plan's direction of travel which is to optimise underutilised brownfield sites.

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

Commercial Floorspace Provision

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

Suitability of the site for Build to Rent housing

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

Summary of Principle

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

8.3 Housing need and delivery

- 8.3.1 The NPPF (Para. 123) is clear that where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning decisions avoid homes being built at low densities and ensure that developments make optimal use of the potential of each site. In these circumstances:....c) local planning authorities should refuse applications which they consider fail to make efficient use of land, taking into account the policies in this Framework. In this context, when considering applications for housing, authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site (as long as the resulting scheme would provide acceptable living standards). The current London Plan sets a target for the provision of 49,000 new homes across London each year. This target is set to increase in the draft London Plan (Intend to Publish) with Policy H1 stating an overall target for the provision of 52,287 new homes each year. Whilst Enfield's 2019 Housing Action Plan recognises that the construction of more affordable high-quality homes is a clear priority, only 51% of approvals in the Borough have been delivered over the previous 3-years.
- 8.3.2 The draft London Plan (ItP) identifies a need for a minimum of 1,246 dwellings per year to be delivered over the next 10-years in the Borough, based on the Strategic Housing Market Assessment (SHMA): an increase over the current target of 798.
- 8.3.3 Enfield's Housing and Growth Strategy (2020) was considered by Cabinet in January 2020 and approved at February's Council meeting (2020) and sets out the Council's ambition to deliver adopted London Plan and Core Strategy plus ambitious draft London Plan targets.
- 8.3.4 The Strategy sets five ambitions, the third of which is 'Quality and variety in private housing'. The key aims of the Strategy seek to address the housing crisis within the Borough. During consideration of the Cabinet report Members discussed the current housing situation and highlighted the rise in private sector rents in proportion to the average salary and the significant rise in homelessness. Enfield had one of the highest numbers of homeless

households in the country. Insecurity and unaffordability of private sector housing has evidence-based links with homelessness. One of the most common reason for homelessness in London is currently due to the ending of an assured tenancy (often by buy to let landlords). MHCLG (2018) data shows a significant increase in the number of households in Enfield using temporary accommodation – with a significant 67% increase between 2012 and 2018.

- 8.3.5 The fourth and fifth ambitions of the strategy are in respect of Inclusive placemaking; and accessible housing pathways and homes for everyone. While the Housing and Growth Strategy is not a statutory document it sets the Council's strategic vision, alongside metrics, in respect of housing delivery. It was approved at a February 2020 Council meeting. Its evidence, data and metrics are considered relevant material considerations.
- 8.3.6 The 2018 London Housing SPG outlines a vision that delivers high quality homes and inclusive neighbourhoods by ensuring that appropriate development is prioritised. Policy H1 of the draft London Plan (ItP) seeks housing delivery to be optimised on sites that have good public transport accessibility (with a PTAL 3-6 rating).
- 8.3.7 As mentioned elsewhere in this report, Enfield is a celebrated green borough, with close to 40% of our borough currently designated Green Belt or Metropolitan Open Land, and a further 400 hectares providing critical industrial land that serves the capital and wider south east growth corridors. The reality of these land designations means the call on optimisation of our brownfield land is greater and brings complex development issues and a major shift in how Enfield's character will need to transform.
- 8.3.8 Taking into account both the housing need of the borough together with the track record of delivery against target, it is clear that the council must seek to optimise development on brownfield sites, particularly those that are currently not being optimised.

Build to Rent

- 8.3.9 Build to Rent is supported in planning policy nationally, and regionally in London. Published London Plan (2016) Policy 3.8 provides support for Build to Rent. Draft London Plan (ItP) Policy H11 supports Build to Rent housing. The supporting text for the policy supports boroughs in taking a positive approach to Build to Rent – so it can better contribute to the delivery of new affordable homes.
- 8.3.10 LPItP Policy H11 sets several criteria for what can qualify as Build to Rent (see below). Policy H11 states that in respect of Build to Rent, where a development meets the criteria set out in Part B of Policy H11, the affordable housing offer can be solely Discounted Market Rent (DMR) at a genuinely affordable rent, preferably London Living Rent level. DMR homes must be secured in perpetuity.
- 8.3.11 The Mayor of London's strong preference is for DMR homes to be let at London Living Rent levels. This is also strongly preferred by LBE Planning Officers – and LBE Planning Officers are clear in viability discussion and negotiations about their aim to maximise the % of DMR homes to be let at London Living Rent levels. Intermediate rented products such as London Living Rent and Discounted Market Rent should be affordable to households on incomes of up to £60,000. The Mayor of London's Housing and Viability SPG (2017) provides specific guidance in respect of Build to Rent, including on viability.

- 8.3.12 Officers have considered the affordability of the proposed Discounted Market Rent homes below. Adopted Enfield Local Plan policies (Core Strategy and Development Management Document) are silent on Built to Rent, which is a relatively new housing type. Key relevant strategic policies and guidance (LP 3.8, LP(ItP) H11 and Affordable Housing and Viability SPG) have been adopted, or emerged, following adoption of Enfield's Core Strategy (adopted in 2010) and the DMD (adopted in 2014).
- 8.3.13 The Council's New Local Plan Issues and Options consultation document (2019/2020) signals an intention to include a policy that support Built to Rent. While this document has limited weight Paragraph 5.6.5 of that consultation document states "The Council supports Built to Rent and will positively promote this housing product through policy making, to support the delivery of the high quality, secure homes that Enfield residents need, in accordance with the London Plan and Mayor's SPG on Affordable Housing and Viability."

Build to Rent – occupants and benefits

- 8.3.14 As noted Build to Rent is a relatively new housing type, particularly within Enfield. Several Build to Rent schemes have, however, been completed and occupied for several years in London. Officers have considered two post-occupancy surveys undertaken of established Build to Rent schemes. Residents who choose to occupy higher density schemes, including Build to Rent, cite a preference for living somewhere with good transport links as the top reason for choosing this type of home. The next three reasons are – 'Feeling safe in the neighbourhood', 'affordability' and 'having a home I can settle in for the long term'¹.
- 8.3.15 Post-occupancy surveys show that where a scheme is sustainably located that most respondents do not own a car. The top reason for not owning a car is 'other modes of transport are more convenient'. When those who do not own cars were asked the main reason why not, 78% of respondents said this was because other modes of transport were more convenient².
- 8.3.16 As noted the Application Site is in an area with excellent public-transport accessibility, supporting Officer's assessment that as a Build to Rent scheme with excellent access to public transport that a car-free scheme, comprising Build to Rent at this location, is credible. Future residents would have lower car ownership, than would be the case if the scheme included shared ownership or market sale homes.

Build to Rent criteria

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

¹ Residents' experience of high-density housing in London (LSE London/LSE Cities report for the GLA). June 2018.

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

8.3.18 The proposal complies with draft London Plan (ItP) Policy H11(A) and the 11 parts of London Plan (ItP) Policy H11(B).

8.3.19 Housing quality is another important criterion in considering a Build to Rent scheme. The Mayor of London's Homes for Londoners: Affordable Housing and Viability SPG sets out design quality criteria (Part 4) in respect of Build to Rent schemes (the SPG sets five key principles for assessing a Build to Rent scheme). The SPG highlights the importance of achieving good quality development to support high quality Build to Rent developments. A detailed assessment of the design element of the scheme is set out below.

Summary of Build to Rent

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

Affordable Housing

- 8.3.22 The NPPF must be taken into account in the preparation of local plans and is a material consideration in planning decisions. The Revised NPPF identifies Build to Rent as purpose-built housing that is typically 100% rented out. Annex 2 of the Revised NPPF (February 2019) defines Affordable Housing as "housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers)". For Build to Rent schemes affordable housing for rent is expected to be the normal form of affordable housing provision. London Plan Policy H5 (ItP) sets out a strategic target for 50% of all new homes delivered across London to be affordable.
- 8.3.23 Enfield sets a borough-wide affordable housing target of 40% (Council's Core Strategy Policy 3). The Council will agree an appropriate figure, taking into consideration site-specific land values, grant availability and viability assessments, market conditions, as well as the relative importance of other planning priorities and obligations on the site.
- 8.3.24 Development Management Document Policy DMD 1 (Affordable Housing) is silent on Build to Rent schemes. DMD 1 supporting text notes that affordable housing comprises three tenures: social rent, affordable rent, and intermediate housing. Enfield's Development Management Document Policy DMD 1 (Affordable Housing) states that development should provide the maximum amount of affordable housing with an appropriate mix of tenures to meet local housing need. Less than 1% of housing in the local area (Southgate Green ward) is intermediate housing.
- 8.3.25 In this context, London Plan Policy (adopted Policy 3.8 and emerging Policy H11) and the Mayor of London's Homes for Londoners: Affordable Housing and Viability SPG (2017) have substantial weight in respect of the assessment of build to rent schemes, and assessment of discounted market rent products as affordable housing.

Affordable housing delivery in Enfield

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

Assessment: Maximising affordable housing

8.3.27 The Applicant has submitted a viability assessment which was scrutinised by the Council's independent viability consultants. The Council's independent viability consultants concluded the scheme cannot support more than 40% affordable housing, based on the tenure mix agreed and the specific nature of the site.

8.3.28 The Council's independent viability consultants challenged a number of assumptions and inputs in to the financial appraisal of the scheme and held discussions with the Applicant regarding differences in appraisal assumptions such as capitalisation rates, profit rates in addition to information clarification requests. Following these discussions, the Council's independent viability consultants concluded that the scheme could not support more than 40% affordable housing on the basis of the tenure mix proposed. See **Appendix 10**.

8.3.29 The Mayor of London's Housing and Viability SPG (2017) provides specific guidance on viability issues associated with Build to Rent. It notes the specific development economics associated with this type of affordable housing.

8.3.30 The Site forms part of a portfolio of sites across London owned by TfL and brought forward by 'Connected Living London' to support the Mayor of London's ambition of increasing the proportion of affordable new homes in the capital. The portfolio seeks to deliver 50% Affordable Housing averaged across the whole portfolio city-wide (delivering a minimum of 10,000 homes across London).

8.3.31 The Proposed Development under consideration here will provide 40% affordable housing based on habitable rooms. This assumes grant of £28,000 per affordable LLR and DMR units is secured. The 'portfolio' approach is accepted by Local Planning Authorities across London with the 50% strategic target achieved at a pan-London level in accordance with London Plan (ItP) Policy H5. Officers consider that, subject to early and late stage viability reviews, that the 40% Affordable Housing (with grant) offer is in line with London Plan (ItP) requirements. Officers accept the Build to Rent 'portfolio agreement' justification in this case.

8.3.32 Scheme layout, scale and density have been informed by site-specific constraints and challenges of this site – with viability implications. Arnos Grove Station is a Grade II* listed building of unique importance in Enfield. It is one of the most highly regarded examples of Charles Holden's designs. Scheme design has been heritage-led, informing building layout, envelop and height and scale. Officers have also assessed that the scheme does not exceed the 'yardstick' density matrix parameters for this type of site. The design and

heritage aspects of the scheme have been assessed below but in summary Officers consider the scheme design, including its scale and density, represent a sympathetic response within the setting of an important designated heritage asset – positively preserving and enhancing it. This has viability implications.

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

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

- 8.3.34 Locally within Southgate Ward, Office for National Statistics (ONS) data (household composition by tenure data current at October 2020) indicates the area surrounding the application site is primarily owner-occupied housing (private) or private rented housing. The ONS data indicates that less than 1% of housing in the local area is intermediate housing. This percentage is also reflected across the Borough where intermediate housing stock represents a relatively low proportion – also 1%. Overall, housing composition in the local area is 88% owner-occupied, private rented or living rent free. Approximately 12% of housing composition is social rented.
- 8.3.35 The data shows a lack of affordable housing tenures in Southgate Green ward. Housing mix is considered below, but in summary ONS data also shows the local area has a relatively high proportion of 3-Bed (or more) family houses, typically with a front door and garden – showing a lack of smaller affordable homes to support housing choice and a socially sustainable and balanced housing supply.
- 8.3.36 In Enfield, approximately 56,000 local households do not qualify for social rent and are unable to afford to purchase a home privately – relying on private rent housing. Build to Rent is more affordable and flexible than other private rented stock, providing quality and security. As many of these residents will not have priority for social housing and cannot afford to buy property, the provision of good quality, secure and affordable rental homes is necessary. Intermediate housing addresses this need.
- 8.3.37 The tenure mix within the affordable housing is in line with adopted and draft London Plan policy. Officers have assessed that the proposed affordable tenures will address a demonstrated local need for proposed affordable housing, which would address the need for an underrepresented affordable housing product within the Southgate Green ward, and across Enfield. It would introduce an appropriate form of affordable housing, within the Southgate Green ward, supported in London Plan policy and guidance (adopted and draft) providing a more balanced housing supply – in an area characterised by a lack of affordable homes generally, including smaller affordable homes and intermediate affordable housing.

Assessment: Affordability

- 8.3.38 Objections have been received raising concerns that the affordable housing will not be affordable to Enfield households. These include concerns that 85% of households in the Borough earn less than £60,000 and so would be unable to afford the affordable rents. Objections also reference the unaffordability of

the proposed affordable housing relative to 'median household income in Enfield of just £34,000, while the average salaries of key workers in London is just £27,000'.

- 8.3.39 The supporting text to LPItP draft Policy H6 provides definitions for affordable housing products, including the Mayor of London's preferred affordable housing tenures. London Living Rent (LLR) is one of these, and offers Londoners on average incomes a lower rent, enabling them to save for a deposit. The text explains that - *as London Living Rent can be a step to homeownership, it can be considered as an affordable homeownership product.*
- 8.3.40 In respect of Discounted Market Rent, not offered at LLR equivalent rents, paragraph 4.6.8 explains that: *all intermediate rented products such as London Living Rent and Discounted Market Rent should be affordable to households on incomes of up to £60,000.* Paragraph 4.6.9 goes on to explain that 'for dwellings to be considered affordable, annual housing costs, including mortgage (assuming reasonable interest rates and deposit requirements), rent and service charge, should be no greater than 40 per cent of net household income, based on the household income limits set out above'.
- 8.3.41 The Applicant's offer, within the context of LPItP and emerging draft Enfield guidance is summarised at **Appendix 11**.
- 8.3.42 Affordability relative to income: As set out above, the Draft London Plan (ItP) states that all intermediate rent products should be affordable to households on incomes of up to £60,000. £60,000 household income is a cap, not an average or minimum. In comparison, Shared Ownership housing, has a higher cap of £90,000. Enfield Council supports Shared Ownership housing as an acceptable intermediate affordable housing product. When assessed relative to income Discounted Market Rent has potential to provide a more affordable and flexible housing product.
- 8.3.43 In considering affordability, Officers have reviewed per week rent charged plus service charge per annum to arrive at an annual housing cost per unit. The rent and service charges used are those that formed the basis of viability discussions with the Applicant. Officers have then considered this as a % of income. Officers note the current DMD Policy 1 position sets a higher cap of £90,000 for intermediate affordable housing products.
- 8.3.44 Within the immediate locality, data from Enfield Council's Knowledge and Insight Hub (2020) indicates Southgate Green ward has the 4th highest average (median) household income of the 21 wards in Enfield. Average household income in the ward is above the median level for the borough as a whole and higher than the London average. Based on this evidence, officers have assessed that the Discounted Market Rent homes would make a meaningful contribution towards the supply of affordable housing within Southgate Green ward, having regard to the relevant policy and guidance tests.
- 8.3.45 Affordability relative to market rent: When considered in respect of Enfield-wide affordability the supporting text to Enfield's adopted DMD 1 policy is relevant. While the policy is silent on Build to Rent and Discounted Market Rent, supporting text comments on rent affordability are relevant (para 2.1.4). It states 'Evidence shows that larger units at rent levels of 80% of market rent will be unaffordable to most families. For residents earning the median borough income, 78% of market rent for 2 bed units, 60% of market rent for 3 bed units and 49% of market rent for 4+ bed units would be affordable'.

8.3.46 70% of the affordable homes at Arnos Grove are proposed as Discounted Market Rent (1- and 2-bedroom homes set at 70% of market rent). The 2-bed units discount of 70% represents a larger discount (more affordable) than the 78% of market rent for 2 bed units described as affordable in the DMD to 'residents earning the median borough income'. In respect of the 3- bedroom Discounted Market Rent homes, these are offered at a discount of 65% of market rent. While this is 5% above 60% of rent for 3-bed units described in the DMD Officers have balanced this against the benefit of the greater discount offered for 2-bed units, including larger 2-bed units. Officers have also agreed early and late stage reviews, that have potential to direct any surplus to further improve the level of discount for 3-bed DMR units or increase the % of DMR LLR 3-bed units.

8.3.47 London Living Rent is the Mayor of London's preferred Discounted Market Rent and is set by the GLA, on a ward by ward basis. 30% of the affordable homes at Arnos Grove are proposed at rent levels equivalent to London Living Rent for the Southgate Green ward where the site is located. Officers are satisfied these units represent genuinely affordable rent units –particularly in respect of Southgate Green ward.

Summary of Affordable Housing

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

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

8.3.49 Officers have assessed the scheme in accordance with London Plan (2016) Policies 3.10, 3.11 and 3.12, London Plan Policies (ItP) H5 and H11. Affordable housing negotiations are in line with London Plan (2016) Policy 3.12 and H5 (ItP) Enfield Core Strategy Policy 3 and DMD1 requirements that negotiations take into account the specific nature of the site, development viability and the need to achieve more balanced housing supply (see above and below).

8.3.50 The scheme is a Build to Rent scheme. London Plan (ItP) Policy H11 states that where housing is accepted by a Local Planning Authority as Build to Rent (see assessment above) – affordable housing can be solely Discounted Market Rent (DMR) at a genuinely affordable rent, preferably at London Living Rent level. Enfield's adopted policies, including Development Management Document Policy DMD 1 (Affordable Housing) are silent on Build to Rent schemes. DMD 1 is also silent on preferred Discounted Market Rent levels and London Living Rent as preferred affordable housing products for Build to Rent schemes.

8.3.51 Officers have assessed that the affordable housing offer, including overall % and tenure represents the maximum reasonable amount of affordable housing deliverable – considering the specific context and character of the site and

details of the scheme. Negotiations have taken account of the site's individual circumstances, in accordance with adopted London Plan Policy 3.12(B), emerging London Plan Policy H5 (ItP) and Enfield DMD1 policy in respect of affordable housing negotiations. This has included consideration of the provision for re-appraising the viability of the scheme prior to implementation (early and late stage viability reviews agreed) and other scheme requirements.

- 8.3.52 One of the key specific considerations (site and scheme) has been the critical need to preserve the setting of the Grade II* listed Arnos Grove station and ensure any scheme represents a proportionate and sympathetic response in the context of designated heritage asset / listed building and other non-designated heritage assets in the locality.
- 8.3.53 The details of the Affordable Housing offer will be captured via way of planning obligations. The Section 106 agreement will also contain review mechanisms (early and late), which will enable the Council to capture any uplift in value afforded to the site after planning permission has been granted.

8.4 Efficient use of land and optimising site capacity

- 8.4.1 Objections have been received that the proposals would result in overdevelopment and excessive density within the Arnos Grove area. Officers have assessed density and site capacity – and consider the proposals are aligned with adopted local and regional (London) policies and guidance in respect of density.
- 8.4.2 Officers have assessed that the proposal is aligned with requirements of the National Planning Policy Framework – that planning decisions should give substantial weight to the value of using suitable brownfield land within settlements for homes and that planning decisions should promote and support the development of under-utilised land, including through the more effective use of car parks.
- 8.4.3 This is in addition to the applicant following a design-led response, in accordance with the preferred and emerging London Plan (ItP) approach to optimising site capacity (see assessment below).
- 8.4.4 The revised NPPF introduced Section 11 (Making Effective Use of Land). Paragraph 118 sets out 5 points planning decisions should consider in promoting the effective use of land. It supports development of under-utilised land and buildings, particularly where this would help to meet identified needs for housing; where land supply is constrained; and where it is considered sites could be used more effectively.
- 8.4.5 Paragraph 118 parts (c) and (d) are particularly relevant, stating that planning decisions should:

c) give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs...;

d) promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained, and available sites could be used more effectively (for example converting space above shops, and building on or above service yards, car parks, lock-ups and railway infrastructure).

- 8.4.6 Paragraph 121 encourages that local authorities take a positive approach to applications for alternative uses, where land is currently developed but not allocated. Paragraphs 122 and 123 set out provisions for achieving appropriate densities – providing clear support for avoiding low densities in areas where there is existing or anticipated shortage of land for meeting identified housing needs. Paragraph 123(C) of the revised NPPF is relevant and states that local planning authorities should refuse applications which they consider fail to make efficient use of land, taking into account the policies of the NPPF.
- 8.4.7 In this context, when considering applications for housing, authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site (as long as the resulting scheme would provide acceptable living standards).
- 8.4.8 NPPF paragraph 122 states that in respect of development density, consideration should be given to whether a place is well designed and ‘the desirability of maintaining an area’s prevailing character and setting...or of promoting regeneration and change’.
- 8.4.9 Adopted London Plan Policy 3.4 requires that development ‘optimise’ housing output taking account of public transport accessibility, local context and character and design principles. It includes Table 3.2 – Sustainable residential quality (SRQ) matrix – providing an indication of appropriate densities in an urban location. Policy 3.4 makes clear that the matrix should not be applied mechanistically.
- 8.4.10 The site has a forecast PTAL of 4/6. Taking account of the Local Centre designation of part of the site, Arnos Grove underground station and bus interchange context –the site has an Urban Character. For such sites, the current density matrix provides an indicative density of 200-700 habitable rooms per hectare (hr/ha) or 70 to 260 units per hectare (u/ha), for schemes with 2.7-3.0hr/unit.
- 8.4.11 Policy H10 of the London Plan (2016) promotes higher density development in locations with a good PTAL score and in close proximity to a local centre in order to ensure the most efficient use of land and to optimise the provision of housing. The London Plan (ItP) incorporates a different approach to assessing density – advocating a design-led approach. LPItP Policy D3 does not follow a matrix approach providing indicative densities. It instead advocates for the best use of land by following a design-led approach that optimises the capacity of sites. This determines the most appropriate form of development, responding to a site’s context and capacity for growth and existing and planned supporting infrastructure capacity (LPItP Policy D2).
- 8.4.12 Local Plan Core Policies 4 and 30 stress the need for high-quality housing and the need to maintain and improve the quality of the built and open environment. Local Plan Policy DMD 37 calls for a design-led approach to ‘capitalising’ on opportunities in accordance with urban design objectives relating to character, continuity and enclosure, quality of the public realm, ease of movement, legibility, adaptability and durability and diversity. Policy DMD8 requires proposals be in an appropriate location and of a suitable scale, bulk and massing.
- 8.4.13 Enfield Policy DMD6 promotes density appropriate to the locality – in line with the Published London Plan Policy 3.4 density matrix. Policy DMD8 which requires proposals to be in an appropriate location and of a suitable scale, bulk and massing. In this instance the Proposed Development is located in a

highly accessible location with a PTAL rating of 4 to 6a, at Arnos Grove underground station and a bus interchange at the front of the station. Enfield Issues and Options (Regulation 18) document (Para. 2.4.1), acknowledges the need to 'exhaust all reasonable opportunities on brownfield land, making underused land work harder and optimising densities with this aim being a 'first principle' of the document.

- 8.4.14 Published London Plan Policy 3.4 (Table 3.2) ((Sustainable residential quality (SRQ) density matrix (habitable rooms and dwellings per hectare)) of the current London Plan sets out guidance for appropriate density in an urban location. The guidance suggests that 70-260u/ha is appropriate in areas with a good PTAL and with an average of 2.7-3.0hr/unit.
- 8.4.15 The proposed density of 143.3u/ha is in line with the density matrix – and therefore the density expectations of adopted Enfield DMD Policy 6. While Officers do not consider the site should be assessed as 'suburban' or solely in respect of the density matrix, the proposed hr density (368.1 hr/ha) would also fall within the range for a PTAL 4-6 suburban site.
- 8.4.16 In summary, the scheme does not exceed Enfield adopted DMD Policy 6 expectations in respect of scheme density (u/ha for an urban or suburban site). Officers note, that Enfield DMD Policies on density reference adopted London Plan policies which would be replaced by the new draft London Plan (ItP) approach which removes the density matrix in preference of a design-led approach.
- 8.4.17 Officers have assessed that the proposed scheme is aligned with the density expectations for the site, under both sets of London Plan policies – the matrix-based Published London Plan Policy 3.4 and design-led London Plan (ItP) Policies D2 and D3. The scheme does not exceed 350u/ha, which is the definition of 'higher density' development in the London Plan (ItP). This means it falls below the density threshold set for increased scrutiny of design quality set in London Plan (ItP) Policy D4 (Part D and E).
- 8.4.18 The applicant has nevertheless still pursued a process of extensive design scrutiny, including two Independent design review panel meetings. Enfield's Design Review Panel concluded, in their last review, that the height and scale of the scheme was appropriate for the surrounding context. The scheme is a high-quality well considered architectural response on a complex and challenging site. It proposes significant enhancements, which will benefit future and existing residents – including public realm enhancements.
- 8.4.19 The scheme, when assessed against adopted and emerging density policy, would not result in overdevelopment or excessive density. The scheme would result in a high-quality design, and well considered architecture and approach to the public realm, providing 162 residential units across the site. When considering the proposed density in the round alongside the site's good PTAL rating, its acceptable impact on residential amenity and its sufficient social infrastructure, it is considered that the scheme results in an appropriate level of development for the site. Further, the quantum of units proposed is acceptable in its specific local setting, subject to all other material planning considerations being met. In density terms the proposed development is in line with existing and emerging policy both at local and regional level.

8.5 Housing mix

- 8.5.1 Officers have sought to maximise affordable family housing in the scheme. All family housing (3-bed/5-person) within the scheme (21.88% of the affordable

homes) are offered as affordable (4 x LLR and 10 x DMR of 65%). Officers have secured early and late stage viability reviews, with any surplus recommended to be directed towards improving the affordability of family housing, through lower % DMR for 3-beds; increased numbers of DMR at LLR level 3-beds. There are no private 3-bed/5-person homes proposed in the scheme, all family homes are affordable.

8.5.2 The remainder of the scheme responds to local demand for 1 and 2-bed units in line with predicted smaller household sizes and to provide a wider mix of unit sizes than is currently evident in the Ward.

8.5.3 The units will be located within the blocks as follows:

Building and Tenure	Unit Size														
	1B2P		1B2P (WC)		2B3P		2B3P (WC)		2B4P		2B4P (WC)		3B5P		Total
	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	
A01 Private	17	22%	3	50%	0	0%	0	0%	11	21%	3	100%		0%	34
A02 Affordable	38	49%	2	33%	0	0%	5	63%	5	9%	0	0%	14	100%	64
A02 Private	0	0%		0%	0	0%	0	0%	2	4%	0	0%		0%	2
B01 Private	4	5%	1	17%	0	0%	1	13%	10	19%	0	0%		0%	16
B02 Private	19	24%		0%	0	0%	2	25%	25	47%	0	0%		0%	46
Total	78		6		0		8		53		3		14		

8.5.4 The Affordable Housing and Viability SPG highlights that in respect of Build to Rent schemes, local policies requiring a range of unit sizes should be applied flexibly to Build to Rent schemes in preferable Build to Rent locations to reflect demand for new rental stock, which is much greater for one and two beds than in owner-occupied or social/ affordable rented sector. The SPG notes that Build to Rent can be particularly suited to development on the edge of town centres or near transport nodes. In addition, LPAs should take account of the distinct economics of Build to Rent, where potential yields and investment risk can be affected by increases in the number of large units within a scheme.

8.5.5 The Council's Core Strategy Policy 5 and Development Management Document Policy DMD 3 set out housing mix need however, the Council's Strategic Housing Market Assessment (SHMA) which post-dates these policies illustrates an annualised requirement, between 2016-2041, for new homes to be 55% 1-bedroom, 16% 2-bedroom and 14% 3-bedroom. Officers have also considered the existing high proportion of existing 3+bed family houses in Southgate Green ward and GLA Strategic Housing Market Assessment (SHMA) predictions that between 2011-2035 around 70% of newly forming households will be 1 and 2-person households without children.

8.5.6 The proposed homes would provide greater choice for people wishing to live in the area who are not part of a larger household. Developments in highly public transport accessible locations and close to facilities are also more suitable for smaller units where car ownership and use is lower – which in turn supports the car-free approach proposed for the scheme. All of the units in the development, including larger size units have appropriate private amenity spaces.

8.5.7 In light of the above, the proposed housing mix is considered appropriate, having regard to the Build to Rent typology and specific site characteristics and location. London Plan (ItP) Policy H10 notes that well-designed one- and

two- bedroom units in suitable locations can attract those wanting to downsize from their existing homes, and this ability to free up existing family stock should be considered when assessing the unit mix of a new build development.

8.6 Residential Quality and Amenity

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

Function well and add to the overall quality of the area for the lifetime of the development;
Be visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
Be sympathetic to local character and history;
Establish a strong sense of place and welcoming and distinctive places; and
Optimise the potential of the site to provide an appropriate mix and amount of development, green and public space, local facilities and transport networks;
Create safe, inclusive and accessible spaces with a high standard of amenity and where crime or fear of crime does not undermine community cohesion or quality of life.

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

Accessible Housing

- 8.6.4 Published London Plan Policy 3.8 and LPItP Policy 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. Policy D7 of the LPItP sets out that in order to provide suitable housing and genuine choice for London’s diverse population, including disabled people, older people and families with young children, residential development must ensure that: i) at least 10% of dwellings meet Building Regulation requirement M4(3) ‘wheelchair user dwellings’, and ii) all other dwellings meet Building Regulation requirement M4(2) ‘accessible and adaptable dwellings’. 10% of units in the scheme will be reserved as dedicated accessible homes in accordance with the Building Regulation 2010 requirement M4(3): “Wheelchair user dwellings”. All other units will be designed in accordance with Building Regulation Standards M4(2), “Accessible and adaptable dwellings” to provide for other types of access needs and potential future requirements. Conditions are recommended.

Housing quality

- 8.6.5 The Site has specific constraints in terms of access (including the bus interchange at the front), topography (including significant level drops) and tree Root Protection Areas. These site-specific constraints have influenced the percentage of dual aspect units, particularly when compared to the buildings on Site B. The housing proposed within Site A is characterised by other amenity benefits, including well-proportioned and sized family 3-bed homes. Site A is also closest to proposed on-site doorstep provision – as well as other play spaces within the local area. Site A housing blocks also include internal communal amenity and concierge. All units in the development, across Sites A and B, meet London Plan (ItP) requirement levels of allocated private amenity space.
- 8.6.6 All of the units either meet or exceed internal floorspace standards required by Table 3.1 of the London Plan (ItP) and comply with the qualitative design aspects to be addressed in housing developments required by Table 3.2 (ItP). All units would meet residential space standards and would include sufficient private outdoor amenity space. The community spaces also include a range of external amenity opportunities. All ground floor units have defensible space at the front – where they front onto more public areas.
- 8.6.7 The Proposed Development would comprise 74% of dual aspect units, with no north facing single aspect units. Within the constraints of the site this is considered to represent a high-quality response. Significantly, all proposed family housing (offered as affordable homes) will be dual aspect, as will all 2-bed homes.
- 8.6.8 Some floors within Site A buildings have up to 10-units per core, which is above the 8-units per core set out in Policy D6 of the London Plan (ItP). The Mayor of London's Affordable Housing and Viability SPG notes that when assessing Build to Rent schemes in respect of design that LPAs are encouraged to take into account the value of on-site management and purpose-built design in dealing with some of the challenges that would otherwise arise were it a build for sale scheme. For example, this may allow flexibility such as on the number of homes per core per floor, and number of single-aspect homes. The core would have good natural light penetration in the lift area and Officers have assessed that the scheme provides a good response, within the constraints of the site.

Daylight/sunlight future occupiers

- 8.6.9 The submitted Daylight/Sunlight assessment includes an analysis of whether the Proposed Development will receive adequate daylight/sunlight in the units and in public and communal amenity areas.
- 8.6.10 The assessment of proposed habitable rooms for Average Daylight Factor (ADF), No-Sky Line (NSL) and Room Depth Criterion (RDC) indicate that overall, 94% and 95% of all proposed rooms meet or exceed the suggested minimum levels for ADF and NSL respectively. In addition, all rooms have been designed to meet the RDC where this applies, i.e. in rooms with a single aspect. Officers have assessed this also represents a very good performance in respect of daylight – particularly within the constraints of the site and scheme characteristics.
- 8.6.11 In relation to sunlight, BRE's guidelines state that sunlight is mostly required in living spaces with the greatest expectation of sunlight within south facing rooms. Living areas with a window facing within 90 degrees of due south were

assessed for sunlight availability both annually (Annual Probable Sunlight Hours (APSH) and in winter (Winter Probable Sunlight Hours (WPSH)). The assessment showed that overall, 89% of the assessed living spaces are expected to meet or exceed the recommendation annually (APSH) with 94% doing so during the winter months (WPSH). Officers have assessed this also represents a good level of performance for a scheme, with limited opportunities for units to be directly orientated south, due to the site's geometry.

8.6.12 The daylight and sunlight results are discussed in more detail, per building as below:

8.6.13 Building A01: The technical assessments undertaken for Building A01 indicate there will be excellent levels of daylight and sunlight, with all 82 rooms meeting or exceeding the recommended levels of ADF and all assessed living spaces receiving levels of sunlight in line with BRE's recommendations both annually and during the winter months.

8.6.14 With regard to sky visibility, all but eight rooms fall short of the recommended level of NSL. The eight rooms that do not meet the recommended level of NSL are bedrooms. However, these rooms will still receive levels of ADF well above guidance recommendations and as such will be adequately daylight.

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

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

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

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

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

- 5 remaining rooms are all secondary bedrooms and would be expected to receive good levels of daylight

- 8.6.19 With regards to sunlight, all assessed living areas in building B01 would be expected to meet BRE's recommendations both annually and during the winter months resulting in excellent levels of sunlight.
- 8.6.20 Building B02: The technical assessments undertaken for Building B02 indicate that 112 (92%) out of 122 habitable rooms would be expected to meet or exceed BRE's recommended ADF levels, and 111 rooms (91%) would be expected to meet requirements for NSL.
- 8.6.21 Ten rooms would not meet recommended ADF levels. Out of these ten rooms, five would be generously sized Living/Kitchen/Diners. One Living/Kitchen/Diner would meet the recommended level for living areas and as such would be considered adequately daylight.
- 8.6.22 The remaining four Living/Kitchen/Diners would be expected to achieve levels of ADF of 1-1.1% owing to the presence of the balcony in front of the window. As mentioned for Building A02, this is not an uncommon scenario in urban environments and is considered acceptable in this context.
- 8.6.23 Five remaining rooms which would not meet recommended ADF levels are secondary bedrooms located in the inner corners of the scheme, where the daylight is generally lower in any event.
- 8.6.24 With regard to sunlight, seven living areas do not meet BRE's recommendations both annually and during the winter months. However, the seven failing rooms meet the recommended target during the winter months, when the sun is lower in the sky and the sun rays are not intercepted by the balconies. Furthermore, for this building future occupants will receive sunlight from their balconies especially during the summer months. Given the urban context of the location, this digression is considered acceptable in this particular instance.

Overshadowing – Public and Communal Amenity Areas

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

Child Playspace and Recreation Space

- 8.6.29 Policy 3.6 of the London Plan seeks to ensure that development proposals include suitable provision for play and recreation noting the provision of play space should integrate with the public realm without compromising the amenity needs/enjoyment of other residents and encourage children to play.
- 8.6.30 The Mayor's 'Shaping Neighbourhoods: Play and Informal Recreation' SPG sets a benchmark of 10 sq.m. of useable children's playspace to be provided per child, with particular emphasis on playspace for children under five years old to be provided on-site. Meanwhile London Plan (Intend to Publish) Policy S4 also recommends that at least 10 sq.m of playspace per child should be provided. In comparison Council Policy DMD 73 does not specify a specific amount of space per child, it sets out that developments with an estimated child occupancy of ten or more children will be required to incorporate on-site play provision to meet the needs arising from the development.
- 8.6.31 The GLA population yield calculator has been used to estimate the possible number of children that could live at the Proposed Development as around No.26. In terms of ages these are expected to be as follows:

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

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

Under 5's:	
Required:	10 sq.m per child (144 sq.m in total)
Proposed:	158 sq.m of doorstep play + 150 sq.m of incidental play
Age 5-11:	
Required:	10 sq.m per child (94 sq.m in total)
Proposed:	120 sq.m
Age 12+:	
Required:	10 sq.m per child (29 sq.m in total)
Proposed:	No on-site play. Playspace will be provided at Arnos Park which is within the 800m distance permitted for playspace located outside of the site.

- 8.6.32 The above figures show that playspace provision will exceed GLA requirements. In addition, given the close proximity of Arnos Park and the existing good quality of the space at the Park, this is considered an acceptable off-site location to provide playspace for the estimated 2.9 children aged 12+ who may live at the future Development.
- 8.6.33 Playspace for children aged 5+ will be concentrated around Block A02 which also houses the larger family size units whilst doorstep and incidental playspace will be spread across Sites A and B.

Landscape and Amenity Space

- 8.6.34 With regards to landscape provision on the site and residential amenity space, each unit will have a private balcony that meets required size standards as stated in the London Plan (Intend to Publish).
- 8.6.35 The proposed external amenity space will total 3,230 sq.m and will include areas accessible to the public including the public square and will also include private shared amenity providing spaces for occupiers of the development. The private areas will be in line with Healthy Street objectives which seek to

prioritise people over vehicles. Planting will be selected to increase the ecological connectivity with the adjoining SINC and Wildlife Corridor.

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

Summary of Residential Quality and Amenity

8.6.37 The National Design Guide (Para. 63) sets out that 'Compact forms of development bring people together to support local public transport, facilities and local services.' Para. 64 further notes that 'Well-designed new development makes efficient use of land with an amount and mix of development and open space that optimises density', further noting that (it) also 'relates well to and enhances the existing character and context.' The National Design Guide further notes that groupings of buildings, spaces, uses or activities create a sense of place, promoting inclusion and cohesion.

8.6.38 The layout and massing of the Development has evolved in order to optimise the site's capacity, as required in policy terms for brownfield land sites in highly sustainable locations. All proposed units will either meet or exceed internal space standards and each unit will have private external amenity space with a minimum of 5 sq.m for 1-2 person dwellings with an additional 1 sq.m per additional occupant. The development has been designed to be tenure blind, with no distinction in terms of quality between private and affordable units.

8.6.39 Whilst some levels of buildings on Site A exceed the recommended number of units per core of 8 (London Housing SPG), the nature of a Build to Rent development means it will be highly managed and have an active concierge, controlled access, two lifts per core and with natural ventilation and daylight within the corridors.

8.6.40 The proposed units have been designed in accordance with required policy standards including Enfield Policy DMD 8, London Plan Policy 3.5 and emerging London Plan (Intend to Publish) Policy D6, and represent a good quality development, with good levels of residential amenity. Whilst there are some exceptions to the compliance of the proposals, such as some single aspect units, Officers consider these are outweighed by the overall quality of the accommodation, including high levels of good quality outdoor amenity space, as well as the benefits delivered in terms of housing delivery and other benefits of the scheme.

8.7 Design

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

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

Layout and introduction of non-residential uses and frontages

- 8.7.4 Scheme layout has been informed by key considerations, including the critical need to preserve the setting of the Grade II* listed Arnos Grove station, and minimise mature tree loss. The layout has considered constraints including the locally listed Arnos Park, which also lies within Metropolitan Open Land and the Grade II* listed station and associated assets such as the car park wall and lampposts. The proposal incorporates new public realm at the front of the site – which is a scheme benefit, improving the setting of the listed Arnos Grove station building. Officers consider this represents an improvement over the existing situation.
- 8.7.5 The layout and design of the development and its impact upon heritage assets, including the listed Station Building and walls, views and residential amenity and the merits of the scheme are fully assessed below. In respect of the easterly block, Block B01, Officers requested additional views (east along Bowes Road) to further consider the townscape and heritage impact of Block B01, including impact on station drum and Arnos Arms. Officers have carefully considered the comments made in respect of the southern building façade alignment of Block B01. Officers have assessed the southern building alignment of Block B01 – set out below.
- 8.7.6 Scheme layout, uses and active frontages are considered to successfully respond to policy objectives set out at Enfield's Core Strategy (2010) Core Policy 45 (New Southgate) in respect of place shaping within this priority area. Taking a holistic and integrated approach to development, including street based urban design solutions such as the delivery of a new square.
- 8.7.7 Block A01: The proposal would introduce an active frontage, including a non-residential unit / frontage within the ground floor of Building A01 – fronting onto the new square. A concierge / resident's lounge / gym area is proposed along this frontage. These uses would support higher levels of footfall in these areas with beneficial increase in casual surveillance – and sense of safety.
- 8.7.8 Site constraints such as substantial ground level changes, locally listed park (Arnos Grove), proximity to railway and Site of Importance for Nature Conservation (SINC) as well as proximity to neighbouring properties, were identified and understood and directly influenced the layout of the proposed development. The resulting layout seeks to minimise overlooking and preserve the amenity of local residents to an acceptable degree, given the constraints of the site.
- 8.7.9 Scheme layout (together with scale and massing) is assessed to be in accordance with Enfield's adopted NCAAP policy (NC Policy 17 Arnos Grove Station) which states that respecting the setting of the station could be achieved by setting the building line of new development back so that views from the local centre are not interrupted.

- 8.7.10 Block B01: Concerns have been raised, including from the Conservation Advisory Group (CAG) and Southgate Green Association (on Behalf of Southgate Green Study Group) in respect of the alignment of Block B01 (southern façade line). In considering the appropriateness of Block B01's southern building line Officers have considered its location, relative to the Arnos Arms and station building – as well as the depth of the footway at this location. The southern building line of Block B01 would align with the southern façade of the station building (and bridge parapet line) – setback c.5m from the southern building line of the existing back of pavement and c.16m from the kerbline. This is a generous footway width (a reasonable width typically considered to be c. 4.5m) and building setback. The townscape and heritage impact of Block B01, and the scheme overall, are assessed in greater detail below.
- 8.7.11 In respect of the description given of the location of the southern alignment of Block B01 – Officers do not consider the description of Block B01 (southern façade) being positioned at the 'back edge of pavement' is accurate. The southern façade of this three-storey block is proposed to be set back, both from the existing back edge of pavement and proposed / future back edge of pavement. An area of semi-private / defensible space is proposed between the southern building line of Block B01 and back of pavement.
- 8.7.12 The CAG notes the placement of the southern building line of Block A01, by comparison, is preferable as it is set back behind a proposed square. Officers agree there is a substantially greater setback between the existing back edge of pavement and the southern building line of Block A01 (c.20m) when compared with the setback between the existing back edge of pavement and southern building line of Block B01 (c.5m). This is because the space to the west is intended to form a new public square (c. 29.6m x c33.8m at its maximum extent). Officers consider the Arnos Grove Local Centre and site would not comfortably support more than one substantial public space – and Officers would not support another substantial public square or space within the scheme.
- 8.7.13 Representations have been received raising concerns about security, including concerns from those who currently drive and park near the station – because they may feel vulnerable walking on the streets rather than driving to the station. One of the primary aims of the Mayor of London (Mayor's Transport Strategy) approach, reducing car-reliance and encouraging non-car travel, is to promote feelings of safety and security increasing activity, including pedestrian footfall. Officers have given detailed consideration to this issue below (see Section 8.20).

Scale, height and massing

- 8.7.14 While the proposed height and scale of the buildings is a change compared with the site's current condition (a brownfield site with a single small kiosk structure, lamp posts and parking barriers), officers consider it to be well handled, and sympathetic to the designated heritage asset / listed building (see below).
- 8.7.15 The principle of introducing height and massing at transport nodes is supported by planning policy. As assessed above, the site is identified as an 'opportunity site' within Enfield's adopted development North Circular Area Action Plan – at NC Policy 2 (Opportunity Site 7). With NC Policy 17 noting the site has potential to be released for redevelopment. A magnitude of change at this site is therefore considered acceptable, subject to detailed assessment of the scheme.

- 8.7.16 Scheme massing has evolved as a sophisticated response to the site's constraints. Proposing varied heights across the site which respond to complex site-specific considerations – including topography, maximising mature tree retention and the listed building. The massing strategy for the scheme was informed by analysis of impacts, including consideration and assessment of the scheme's potential impacts on neighbouring properties – this is aligned with London Plan Policy D3 (ItP) which requires that developments optimise capacity through a design-led approach, by responding to a site's context, capacity for growth and supporting infrastructure capacity.
- 8.7.17 Blocks A01 and B01 (which flank the listed building to the east and west) present as modest human-scaled elements onto Bowes Road, importantly preserving views towards the station. Taller buildings take advantage of the significant site slope – to reduce perceived height.
- 8.7.18 The scheme underwent several iterations throughout the pre-application process and a further revision during consideration of the scheme in response to Officer comments. The scheme was revised in September 2020, with revisions including separate private external amenity space; redivision of communal and private amenity space to ensure amenity space throughout the site was allocated for optimum use; and revisions to the materiality of the boundary area between the Proposed Development and existing neighbouring properties.
- 8.7.19 Overall, the proposed massing, scale and siting of the proposed buildings is considered to ensure a positive sense of hierarchy is maintained across the site, and that the listed building is not dominated by the proposal – and importantly that its setting is preserved and enhanced.
- 8.7.20 Scale and massing (together with layout) were explored throughout a lengthy pre-application process, including discussion with Historic England and the Council. This included reductions in height to Block A02 to minimise its visibility in the setting of the listed Underground station. Scale and massing are assessed to be in accordance with Enfield's adopted NCAAP policy (NC Policy 17 Arnos Grove Station) which states that new development would need to respect the setting of the Grade II listed station building.
- 8.7.21 Fronting onto Bowes Road, the proposal has a prevailing height of between 1, 3 and 4 storeys, introducing modest and human-scaled elements compatible with, and in some cases lower than surrounding buildings. Buildings up to six-storeys along main thoroughfares such as Bowes Road already exist. The proposal has not been referred to (or accepted by) the Mayor of London based on height – it is referable based on unit numbers. The site is not located on a ridge or high-point.
- 8.7.22 The proposals comprise 4 blocks (A01, A02, B01 and B02). Half of the blocks are four storeys or less. The tallest blocks, to the north of the site are substantially lower than several taller buildings within proximity of the site, which form part of the existing townscape (with heights of up to thirteen storeys). Refer **Appendix 12**.
- 8.7.23 The overall scale and massing of the scheme is considered to accord with London Plan Policy GG2 (ItP) which encourages that new buildings and spaces respond to form, style and appearance to successfully integrate into the local character of an area, with a positive relationship with the natural environment and respect and enhancement of the historic environment. The

varied and stepped height approach is supported by National Design Guidance which notes this can create a varied roof line, so that a development can sit sensitively in the wider (historical) context.

Character and townscape, including views

- 8.7.24 NPPF, London Plan and Enfield Policies are supportive of optimising sites provided that developments are of a high-quality design that are sympathetic to the surrounding area. Adopted London Plan Policies 7.1 and 7.4 and London Plan Policies D1 and D2 (ItP) seek to ensure that new developments are well-designed and fit into the local character of an area. Adopted London Plan policies require developments to optimise housing output, taking into account local context and character. Policy 3.5 of the current London Plan seeks to enhance the quality of local places taking into account local character and density. Core Strategy Policy 30 states that all developments and interventions in the public realm must be high quality and design-led. Development Management Document policy DMD 37 notes that development should be suitable for its intended function, appropriate to its context and regard to its surroundings.
- 8.7.25 Enfield Characterisation Study indicates the site is located in a Mixed Urban Areas – Centre – Metroland Centres typology. The Study states that with regards to ‘Metrolands’ these centres tend to be ‘contemporary with their local area’ as opposed to a centre that has evolved historically over time.
- 8.7.26 The applicant has submitted a Townscape Visual Impact Assessment (TVIA). The TVIA includes 11 verified views, agreed with Officers. Refer **Appendix 13**. Views A, B and C use a fully-rendered model of the proposed buildings and landscaping, while the remaining eight views illustrate the location of the proposed buildings with a green ‘wireline’, which is solid where the building outline will be visible and dashed where the building outline will not be visible. The TVIA assesses the effects of the proposed development on these 11 views, identifying the nature of potential effects, their magnitude and their nature. It then goes on to consider cumulative effects.
- 8.7.27 The report concludes that ‘the beneficial effects on townscape and views of the station resulting from the construction of the proposed buildings are considered to outweigh any adverse effects it will have on the three key views of the Grade II* listed Underground station from Bowes Road (Views A, B and C as illustrated below).
- 8.7.28 The design has been led from the earliest stages by an understanding and response to the listed station and surrounding interwar townscape, and this is reflected in the final design, materiality, height, massing and scale of the new buildings’.
- 8.7.29 In respect of views experience a minor or neutral scale effect, the Applicant’s TVIA sets out that the proposals are likely to give rise to an adverse impact upon some views from the interwar suburban character area immediately to the east and west of the Site will adversely change. The TVIA assesses that the height, massing, design and materiality of the proposal would this impact to an extent. Officers agree that degree of change will be most pronounced when viewed from the east and west but balance this townscape impact against the nature of the receptors (and number). A further three distant views (Views I, J and K) are assessed to be neutrally affected by the proposals.

- 8.7.30 The TVIA concludes that 'overall, the proposed development will have a beneficial townscape and visual impacts within the study areas and will preserve the significance and setting of Arnos Grove Underground Station'. The heritage assessment of the scheme below, considers each view, and individual adverse and beneficial effects. Officers have also assessed a number of additional views (to the east, along Bowes Road).
- 8.7.31 In respect of TVIA View A – Officers assessment has also considered the benefits of the current alignment of Block A01's southern façade, including the form and height of the one-storey element. Officers consider that the current alignment of Block A01 positively conceals much of the station's Back of House areas (including plant compound) – which currently form part of the station's setting and detract from the station building/drum.
- 8.7.32 Documents submitted in support of the applications explain the station's operational details, including those immediately to the north-west of the station building. This area is used for London Underground Line maintenance / operational access. Officers have assessed the visibility of this area (existing) from various viewpoints, on site in assessing whether the alignment of Block A01's southern building line would provide a benefit in reducing the visual prominence of those areas. Officers have concluded that the proposed southern alignment would positively enclose the new proposed public square, while critically preserving the dominance of the station drum.
- 8.7.33 The alignment also beneficially preserves glimpses towards the ridgeline, well beyond the station to the north-east, which are important in retaining an appreciation of the station as part of its broader context. The single storey element, alongside the geometry and layout of the square, respond to the strong geometry of the station building. Officers have considered and acknowledge the sophisticated approach to the layout of the proposed new public square, which has carefully considered – and sought to mirror the internal layout of the station building itself.
- 8.7.34 The definition provided to the proposed new public square, through inclusion of the one-storey element, recalls the original concept of the station, as being flanked by a modest carpark forecourt – which was eroded when the Site A car park was unsympathetically extended. Officers consider that the current alignment, while finely balanced, provides several benefits, outlined above – and that setting back the southern façade of Block A01 would reveal more of the station's back of house areas, including plant compound and gate line – which is not preferred.
- 8.7.35 Objections have been received questioning the accuracy of the visual information submitted. This includes questions in respect of the relationship of the single-storey element at Block A01 relative to the station building. The Applicant has responded clarifying that the TVIA and artistic computer generated imaged (contained in the submitted Design and Access Statement) have been rendered from the same model and position matched to site photographs. TVIAs are verified and therefore should be considered the point of reference for accurate building positions and heights. Two views (TVIA View A and a similar DAS view), while similar have slightly different viewpoints and field of view. TVIA view A is positioned further west and looking more obliquely along Bowes Rd. The DAS artistic render is positioned closer to the station looking more north into the site, to allow for a wider panoramic image capturing the whole scheme. This results in a slight skewing of the perspective and appearance of the relatively higher drum. The Applicant has confirmed that the building model and positions are current and accurate.

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

represent a high-quality design, which will help create a distinctive sense of place and will make a positive contribution to the wider townscape. The layout and scale of the scheme was amended during pre-application in line with adopted Enfield North Circular Action Plan NC Policy 17 Arnos Grove Station – to ensure that it respect the setting of the station, setting the building line of new development back so that views from the local centre are not interrupted.

Articulation and Materials

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

Conclusion of Design

8.7.45 The National Design Guidance sets out that well-designed places have ten key characteristics which work together to create its physical character and help to nurture and sustain a sense of community. The Guidance further states that these 10-characteristics contribute towards the cross-cutting themes for good design set out in the NPPF. The ten characteristics are as follows:

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

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

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

8.7.48 Objections have been received on the issue of the Proposed Development not being in keeping with the surrounding area, and as such will affect the visual appearance of the area and also how the height may affect neighbouring amenity. These considerations have been balanced with considerations in respect of the suitability of the site for the proposed development; the quality and sensitivity of the design proposals (designed to ensure the proposals do not dominate or overwhelm the listed building to an extent resulting in an adverse impact on the listed asset - see below).

8.7.49 Officers have assessed that the proposal would result in a high-quality scheme, which would enhance the public realm, whilst making a meaningful

contribution towards the Borough's housing targets. The scheme is assessed to be a well-designed scheme which would be located in a sustainable location. Planning conditions to secure quality materials and detailing are recommended to ensure the development is delivered to an appropriately high quality.

8.8 Impact on Heritage Assets

8.8.1 Arnos Grove Station is a Grade II* listed building of unique importance to Enfield. It is one of the most highly regarded examples of Charles Holden's ground-breaking Modernist designs for the Piccadilly line extension. It is a key landmark for the local area. There is a statutory duty on decision makers to ensure the special interest of a listed building is properly considered as a material consideration when determining an application affecting its special interest or setting. Other heritage assets (designated and non-designated) are located within the vicinity of the Application Site. These are the Bowes Road Library and Arnos Pool (Grade II listed building); and Arnos Park (locally listed, non-designated). Heritage Officers have advised that while the Arnos Arms is not locally listed, it is deemed to be a non-designated heritage asset. Officers have considered it in the assessment below.

Relevant policy and legislation

- 8.8.2 In respect of listed buildings, the Planning (Listed Buildings and Conservation Areas) Act (The Act) 1990 require that all planning decisions 'should have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses'. The Act places a statutory duty on decision makers to ensure the special interest of a listed building is properly taken into account as a material consideration when determining an application affecting its special interest or setting. If harm is identified, it should be given considerable importance and weight in any planning balance. Sections 16(2) and 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990, Chapter 9, refer to setting.
- 8.8.3 The Revised NPPF states that when considering the impact of the proposal on the significance of a designated heritage asset, great weight should be given to the asset's conservation and the more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. Significance is the value of the heritage asset because of its heritage interest, which may be archaeological, architectural, artistic or historic, and may derive from a heritage asset's physical presence or its setting. Where a development will lead to 'less than substantial harm', the harm should be weighed against the public benefits of the proposal, including securing its optimum viable use. Chapter 16 of the Revised NPPF states that local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. It also encourages LPAs to take account of a non-designated heritage asset in determining the application. In weighing applications that affect directly or indirectly non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm.
- 8.8.4 Paragraph 190 of the NPPF requires local planning authorities to identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting its setting), taking account of the available evidence and any necessary expertise. That assessment should then be taken into account when considering the impact of the

proposal on the heritage asset, to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposal.

- 8.8.5 Paragraphs 192 to 194 of the NPPF provide that in determining planning applications, local planning authorities should take account of: a. the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; b. the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and c. the desirability of new development making a positive contribution to local character and distinctiveness.
- 8.8.6 Paragraph 193 states that 'When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance'.
- 8.8.7 Paragraph 194 states that 'Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting) should require clear and convincing justification. Substantial harm to or loss of: a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional; b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional'.
- 8.8.8 Paragraph 195 of the NPPF deals with substantial harm to or total loss of significance of a designated heritage asset. Paragraph 196 of the NPPF provides that where a development proposal will lead to less than substantial harm to the significance of the designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use. Paragraph 197 of the NPPF deals with non-designated heritage assets stating that the 'effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that affect directly or indirectly non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset'.
- 8.8.9 Paragraph 200 of the Revised NPPF states that Local planning authorities should look for opportunities for new development within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.
- 8.8.10 Adopted London Plan Policy 7.8 and Draft London Plan (ItP) Policy HC1 'Heritage conservation and growth' state that development should conserve heritage assets and avoid harm, which also applies to non-designated heritage assets. Adopted Enfield Core Policy 31 (Built and Landscape Heritage) requires that special regard be had to the impacts of development on heritage assets and their settings, Enfield Core Policy 30 supports high-quality and design-led public realm. DMD 44 (Preserving and Enhancing Heritage Assets) requires that developments should conserve and enhance the special interest, significance or setting of a heritage asset. DMD 37 (Achieving High Quality and Design-Led Development) requires that

Development must be suitable for its intended function and improve an area through responding to the local character, clearly distinguishing public and private spaces, and a variety of choice. Making Enfield: Enfield Heritage Strategy 2019-2024 SPD (2019) is also relevant.

8.8.11 Historic Environment Good Practice Advice in Planning Note 3 provides information on good practice in relation to assessing impacts on the setting of heritage assets. Of note in the GPA is the inclusion of the consideration of views and whether there would be any impact to the significance of the views on the heritage asset as a result of the development. However, it is of note that a distinction is made between views that contribute to heritage significance and those valued for other reasons.

8.8.12 Historic England guidance entitled *The Setting of Heritage Assets, 2015* states: "Where the significance of a heritage asset has been compromised in the past by unsympathetic development affecting its setting, to accord with NPPF policies, consideration still needs to be given to whether additional change will further detract from, or can enhance, the significance of the asset. Negative change could include severing the last link between an asset and its original setting; positive change could include the restoration of a building's original designed landscape or the removal of structures impairing views of a building." [p.4]

Arnos Grove Station: Site and Immediate Setting - Heritage context

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

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

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

- 8.8.16 The Applicant has submitted a Heritage Assessment in accordance with NPPF and adopted policy requirements DMD 44, which sets out a clear understanding of the historic environment and background to the heritage-led design development. Substantial pre-application discussion was undertaken in the assessment of the scheme, to ensure that the special interest of the listed building and setting were carefully considered. This included reduced the height of the two blocks closest to the station during the pre-application process so as not to detract from the prominence of the station building. Key design principles were set early in the design process to maintain and enhance the station's significance. This heritage-led design approach is in accordance with best practice, policy and guidance.
- 8.8.17 Layout, height and massing: The Heritage Statement submitted in support of the application notes that while alternative schemes to increase the height both in concentrated locations and more generally across the Sites were tested – these were discarded as inappropriate due to the adverse impact that taller buildings would have on sensitive views of the Arnos Grove Station Building ticket hall drum approaching from both directions along Bowes Road.
- 8.8.18 The height of the proposed buildings has been kept relatively low across the southern portion of the site, stepping up to the north. Site A and B are characterised by their deep geometry with the norther building line of Block A02 located approximately 150m to the north of the carriageway of Bowes Road. The proposed massing is varied and stepped to prevent, mitigating the impression of a wall of development behind the station. Upper storeys, including Block A02's top floor is partially set-back from the primary elevation (west, south and north). Objections have been received in respect of the impact of the tallest element of the proposal in respect of the impact on the listed building. The tallest element of the scheme is located approximately 110m to the north of the listed station building. The site's topography (described at Section 3 above) means the full height of this element, cannot be perceived when viewing the station drum / ticket hall at street level from the south, south-west or south-east – as lower levels are below street level.
- 8.8.19 A pergola structure which was also proposed during pre-application, but which was not supported by Enfield's independent Design Review Panel – due to its potential impact on the setting of the listed building was also removed. A detailed assessment of layout, height, scale and massing is set out above.
- 8.8.20 Officers consider the proposal successfully enhances the setting of the listed station. The Officer assessment is supported by the views submitted by the Enfield Society, who consider the scheme protects the views of this important landmark building and that the development will provide an improved setting compared to the existing car park arrangements. The Enfield Society supports the proposal. The Society is represented on the former Conservation Advisory Committee and have noted that that group was also broadly supportive of the scheme (provided there was strict conditioning of materials). Historic England have not raised any objection. The Greater London Authority have concluded that the setting, historic and architectural significance of the listed building would also be preserved and enhanced by the development. Therefore, no harm is caused to the significance of the Grade II* listed Arnos Grove station.
- 8.8.21 The proposal is considered to preserve the setting of the listed building and in the wider townscape context would enhance its setting through sensitive architecture and design. The resultant development would also provide a new public square to the west of the building that would improve access to and the public experience of the building and thereby enhance its historic significance. The development is also largely deferential to the station, which remains the

focal point in the local townscape, thereby preserving its architectural significance and its intactness.

- 8.8.22 The Design Review Panel noted in its final review that it supported the principle of protecting the silhouette and shape of the drum by working to not place buildings behind it. The proposals would result in an improved setting, including through the introduction of a new public square to the west of the station building. The design of the scheme is assessed as having sympathetically responded to this important designated heritage asset – positively preserving and enhancing it.
- 8.8.23 In respect of the impact of the scale and massing on the booking hall large panels of glazing (and internal daylight of the booking hall) Officers have reviewed submitted material and are satisfied the scheme would not result in a detrimental impact on the light coming into the station – and important in respect of the station’s architectural interest. The proposals would not alter internal station features – so would have no impact on the internal ‘intactness’ of the building.
- 8.8.24 Based on a cumulative assessment it is considered that, the benefits would outweigh the individual harms identified. Overall, no harm is caused to the significance of the Grade II* listed Arnos Grove station as a result of the Proposed Development. The proposal is assessed as enhancing the setting of the listed station.

Wider Setting – Heritage Context

- 8.8.25 As noted above TVIA views were agreed at pre-application stage with LB Enfield and Historic England. Enfield’s Heritage Officers have assessed that no adverse impact is found on surrounding heritage assets from the proposed development, in terms of scale and massing (see above).
- 8.8.26 Enfield’s Heritage Officers have concluded that the proposed heights and siting of buildings ensure that a sense of hierarchy is maintained across the site, that the listed building is not dominated by any new development and that its setting is preserved. The transition in scale to address the change in heights between both the proposed scheme and Arnos Arms and the Grade II* listed station building are well conceived. The impact on the Arnos Arms, has been assessed above. The Arnos Arms does not appear on the Council’s Local List (2018). Heritage Officers advise while not locally listed it is deemed to be of merit – stating they consider it a non-designated heritage asset. Officers have considered the impact on the significance of the Arnos Arms, having regard to the scale of any potential impact.
- 8.8.27 Arnos Park is a local listed heritage asset, the significance of which is derived from its age, rarity, historic association, landmark status, designed landscape, social value and aesthetic merit (Enfield Local Heritage List, 2018). The submitted Heritage Statement states that ‘the proposed development will be visible above the tree canopy in views south from within the central open area of the park, where no urban development is currently visible. This lack of development above the canopy contributes to the designed nature and aesthetic merit of the park, so the visibility of the proposed development will cause some harm to the park’s significance’. The statement goes on to note that ‘many elements of the park’s character are derived from its proximity to urban development. During the winter, the surrounding residential streets are clearly visible beyond the boundary of the park’. The Applicant’s Heritage Statement sets out that a degree of harm caused by the new buildings would

occur and this would be less than substantial by virtue of the park's character as a designed landscape bordered on all sides by suburban development.

- 8.8.28 As noted above, Officers have undertaken careful assessment, including site visits to consider potential impacts across the area, including Arnos Park. Officers agree with the conclusions of the Heritage Statement that the degree of harm, with mitigation, would be less than substantial by virtue of the park's existing character – which is already established as a designed landscape (Enfield Local Heritage List, 2018) bordered by existing development. Officers have given considerable importance and weight to the harm identified.

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

- 8.8.29 The existing car parks at Arnos Grove Underground Station are not part of the station's designed setting. The existing arrangement are of low townscape quality (negative). The create a gap in the streetscape and along the high street. The car parks are assessed as not contributing towards to station's significant and can be considered to detract from its station's significance. The proposal includes the formation of a public space/square, affording a degree of breathing space and an enhanced setting to the Grade II* listed station, and Officers are in support of this.
- 8.8.30 Attempts to improve the blue badge parking area are welcomed. It is acknowledged that above and below ground site constraints will prohibit any potential improvements to the gable end wall of 348 Bowes Road.

Bus interchange

- 8.8.31 The Conservation Advisory Group has raised concerns that the bus interchange, in its current dilapidated state, represents a major detraction from the visual benefits of the development. They have noted that the Applicant had committed to "we take this point away and discuss with our transport colleagues" but note that nothing has changed.
- 8.8.32 Officers agree there is scope for improvement in respect of the bus interchange – which visually detracts from the benefits of the development. The Applicant has stated that 'some change will occur within this area as the develop necessitates the reconfiguration of the existing bus stops/stands at the station. An indicative bus interchange design has been developed in consultation with TfL buses which includes the relocation of the bus stop from the creation of the public square'. In addition, the existing 24-hour taxi rank will also be re-provided fronting on Bowes Road.
- 8.8.33 There is scope for a specification to be agreed for Section 278 (Highways) works. Officers note, however, that the most intrusive and unsympathetic element, the 'Cycle Hub', is located on LBE highway land. Whilst Officers agree it is regrettable that greater certainty in respect of these works has not been secured, Officers consider this would not be enough reason to recommend refusal of the scheme – which proposes other public realm enhancements.
- 8.8.34 The details submitted for approval do not cover the bus stop area. This element of the scheme has scope for works to be undertaken via a Section 278 (Highways) agreement.

Listed building consent - alterations to historic fabric

- 8.8.35 The Proposal includes part demolition of the listed car park wall which is supported in principle, subject to the submission of further details to be submitted via planning condition. Likewise details of other proposed associated works including the relocation and restoration of four lampposts; works to the walls and railings on the north and south sides of the forecourt; and works to the wall on the west side of the forecourt will be required via planning condition.
- 8.8.36 The Applicant's Heritage Statement describes works to the dwarf walls. Stating that the northern dwarf boundary wall and attached railings will be removed to enable the creation of the new public square and single-storey element of Building A01. The wall is described as being of minor significance as part of Holden's original station and its loss will cause some minor harm. The loss of this wall is considered to be outweighed by the benefits gained by enhancing the station's setting through the new public square. The wall's current function – to delineate the northern boundary of Holden's original station car park – will be replicated by the proposed new single storey element on the north side of the public square. In addition, where feasible and appropriate, there is an aspiration to salvage undamaged bricks following the wall's demolition and reuse them in the reconstruction of other parts of the original car park boundaries, as discussed below.
- 8.8.37 It is proposed that the southern dwarf boundary wall of the western car park will be removed and replaced to create wider openings than at present, resulting in the loss of some historic fabric. This is necessitated in order to improve circulation and accessibility to the new public square and to facilitate the creation of a segregated vehicular route to the west of the Site. While this would cause some negligible harm to the listed structure, it would not affect our understanding of the wall's original form and function, as it would continue to perform its current role in delineating the southern boundary of Holden's station composition and its general appearance would be minimally affected.
- 8.8.38 The amount of fabric to be lost has been kept to a minimum, and it is proposed that intact bricks recovered from the removal of the north boundary wall will be reused in the reconstruction. Any harm resulting from this intervention would be outweighed by the enhancement of the station's setting through the creation of the public square, facilitated by the proposed alterations to the wall.
- 8.8.39 The four original lamp standards within the southern section of Site A are proposed to be removed temporarily and relocated as part of the landscaping of the southern part of Site A. While these structures are curtilage listed, they are of minimal significance due to the unsympathetic replacement of their original lanterns. Their proposed relocation will help to facilitate the creation of a public square, enhancing the setting of the main station building. Therefore, their retention and relocation is considered a heritage benefit.
- 8.8.40 Officers agree with the overall balance, in respect of heritage benefit. However, as set out below Officers acknowledge and have given detailed consideration to the specific areas of harm. While considered to be less than substantial, and at the lower end of the scale, it is important to note that within the legislative and policy requirements referred to above, the first step for the decision maker is to consider each designated heritage asset which would be affected in turn and assess whether the proposed development would result in any harm to the heritage asset. Considerable

importance and weight is attached to each harm identified, and their cumulative effect is considered below.

Design and Materials

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

Archaeology

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

Conclusion of Heritage Impact

- 8.8.43 The proposal has been carefully assessed against the requirements of Section 16 and 66(1) of Planning (Listed Buildings and Conservation Areas) Act 1990. London Plan Policy (2016) 7.8, Enfield adopted Core Policy 30 and 31 and DMD 37 and 44 and the NPPF. Officers have had regard to the National Planning Practice Guidance in respect of conserving and enhancing the historic environment. Officers have given careful consideration to the three key factors LPAs are required to consider in determining proposals that affect heritage assets (the desirability of sustaining and enhancing the significance of Heritage Assets and putting them to viable uses consistent with their conservation; the positive contribution that conservation of Heritage Assets can make to sustainable communities including their economic vitality; and the desirability of new development making a positive contribution to local character and distinctiveness) and Historic England guidance 'The Setting of Heritage Assets [2015]'.
8.8.44 In respect of overall impact and balance - the Applicant's Heritage Statement concludes that the new development will enhance the setting of the listed station. Its heritage-led design aligns with key principles laid out at the earliest stages of the design process to maintain and enhance the station's significance. Officers agree with this balance, overall but acknowledge and have given detailed consideration to the specific areas of harm.
8.8.45 While considered to be less than substantial, and at the lower end of the scale, it is important to note that within legislative and policy requirements, each designated heritage asset which would be affected should be considered in turn and assessed in respect of whether it would result in any harm to the heritage asset. Relatively recent case law establishes that an assessment of the degree of harm to a heritage asset is a matter for the planning judgement – and that a finding of harm is a consideration to which considerable importance and weight must be given in carrying out the balancing exercise. There is a 'strong presumption' against granting planning permission for development which would harm a heritage asset. The presumption, while

statutory, can be outweighed by material considerations powerful enough to do so. A balanced assessment, however, between harm to a heritage asset and planning benefits can only be arrived at if the local planning authority is conscious of the statutory presumption in favour of preservation – and it demonstrably applies that presumption to the proposal being considered.

- 8.8.46 In respect of NPPF paragraph 196, case-law also establishes that even where the harm identified is less than substantial, that harm must still be given considerable importance and weight. Where more than one heritage asset would be harmed the decision maker also needs to ensure that when the balancing exercise is undertaken, the cumulative effect of those several harms to individual assets is properly considered. Considerable importance and weight must be attached to each of the harms identified and to their cumulative effect.
- 8.8.47 Officers have given considerable importance and weight to each of the harms identified and to their cumulative effect.
- 8.8.48 Officers have considered the effect of the individual, less than substantial harm arising in respect of non-designated asset of Arnos Park (see above). The scheme would appear as a new element above the tree canopy. The park's character is attributable to its proximity to urban development, with surrounding streets and development visible (during winter). Other urban elements exist within the park, including the Piccadilly Line viaduct, which forms a dominant built feature running along the western half of the park. The Applicant's Heritage Statement concludes that the degree of harm caused by the new buildings is less than substantial by virtue of the park's character as a designed landscape bordered on all sides by suburban development. The impact will be mitigated through the quality of the proposed design, and Officers have recommended robust conditions to secure high-quality details and materials. Officers agree that the degree of harm caused by the new buildings is less than substantial by virtue of the park's character as a designed landscape bordered on all sides by suburban development.
- 8.8.49 Officers have considered the impact of the proposed development in respect of Bowes Road Library and Arnos Pool is a Listed Building (Grade II). It is located to the east of the Application Site and is setback behind the established building line of dwellings to its east and west. Offices have requested additional views towards the Application site (from the east) to satisfy themselves in respect of the potential impact of the proposals on the Bowes Road Library and Arnos Pool. Officers are satisfied that there was be no harm arising as a result of the proposed development.
- 8.8.50 In respect of the setting of the station building, the development will create a new backdrop to the station, which will cause some harm in reducing the openness of the station's setting. However, this harm is considered less than substantial and is mitigated by the scheme's sensitive massing and layout which defers to the station's prominent position in the streetscape.
- 8.8.51 Officers have assessed that the proposal would result in a substantial heritage benefit in enhancing the setting of the Grade II* listed Arnos Grove Underground Station. The small loss of historic fabric that will result from the removal or reconstruction of the car park boundary walls will cause minor to negligible harm to the station's significance. Officers have, however, given special attention to the scope of the changes to the original fabric, although modest – and recommended conditions and careful attention given to ensuring reuse of the original materials. Officers have also balanced this harm with the

public benefits that the scheme will deliver including improving pedestrian circulation around the station and the creation of the new public square.

- 8.8.52 The Proposed Development has evolved to take account of its heritage setting and the applicants have tailored the design to specifically use a sensitive style of architecture that includes strong modernist and art deco elements in reference to the station. Enfield's Conservation Officers have concluded that the listed building is not dominated by the proposal and that – its setting is preserved and enhanced, overall.

8.9 Neighbouring Amenity Considerations

- 8.9.1 London Plan Policy 7.6 sets out that buildings should not cause unacceptable harm to residential amenity, including in terms of privacy and overshadowing. Emerging London Plan Policy D6 notes that development proposals should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context, whilst avoiding overheating, minimising overshadowing and maximising the usability of outside amenity space. Meanwhile Policy CP30 of the Local Plan seeks to ensure that new developments have appropriate regard to their surroundings, and that they improve the environment in terms of visual and residential amenity. Lastly Enfield Policies DMD 6 and 8 seek to ensure that residential developments do not prejudice the amenities enjoyed by the occupiers of neighbouring residential properties in terms of privacy, overlooking and general sense of encroachment.

BRE Guidance - Daylight and Sunlight:

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

BRE Guidance – Daylight to Existing Buildings:

- 8.9.4 The BRE Guidelines stipulate that... "the diffuse daylighting of the existing building may be adversely affected if either: the VSC [Vertical Sky Component] measured at the centre of an existing main window is less than 27%, and less than 0.8 times its former value the area of the working plane in a room which can receive direct skylight is reduced to less than 0.8 times its former value." (No Sky Line / Daylight Distribution).
- 8.9.5 At paragraph 2.2.7 of the BRE Guidelines it states: "If this VSC is greater than 27% then enough skylight should still be reaching the window of the existing building. Any reduction below this level should be kept to a minimum. If the VSC, with the development in place is both less than 27% and less than 0.8 times its former value, occupants of the existing building will notice the

reduction in the amount of skylight. The area lit by the window is likely to appear more gloomy, and electric lighting will be needed more of the time.”

- 8.9.6 The BRE Guidelines state (paragraph 2.1.4) that the maximum VSC value is almost 40% for a completely unobstructed vertical wall.
- 8.9.7 At paragraph 2.2.8 the BRE Guidelines state: “Where room layouts are known, the impact on the daylighting distribution in the existing building can be found by plotting the ‘no sky line’ in each of the main rooms. For houses this would include living rooms, dining rooms and kitchens. Bedrooms should also be analysed although they are less important... The no sky line divides points on the working plane which can and cannot see the sky... Areas beyond the no sky line, since they receive no direct daylight, usually look dark and gloomy compared with the rest of the room, however bright it is outside”.
- 8.9.8 Paragraph 2.2.11 states: Existing windows with balconies above them typically receive less daylight. Because the balcony cuts out light from the top part of the sky, even a modest obstruction may result in a large relative impact on the VSC, and on the area receiving direct skylight.” The paragraph goes on to recommend the testing of VSC with and without the balconies in place to test if it the development or the balcony itself causing the most significant impact.
- 8.9.9 The BRE Guidelines at its Appendix F gives provisions to set alternative target values for access to skylight and sunlight. It sets out that the numerical targets widely given are purely advisory and different targets may be used based on the special requirements of the proposed development or its location. An example given is “in a mews development within a historic city centre where a typical obstruction angle from ground floor window level might be close to 40 degree. This would correspond to a VSC of 18% which could be used as a target value for development in that street if new development is to match the existing layout”
- 8.9.10 Paragraph 1.3.45-46 of the Mayor of London’s Housing SPD states that: ‘Policy 7.6Bd requires new development to avoid causing ‘unacceptable harm’ to the amenity of surrounding land and buildings, particularly in relation to privacy and overshadowing and where tall buildings are proposed. An appropriate degree of flexibility needs to be applied when using BRE guidelines to assess the daylight and sunlight impacts of new development on surrounding properties, as well as within new developments themselves. Guidelines should be applied sensitively to higher density development, especially in opportunity areas, town centres, large sites and accessible locations, where BRE advice suggests considering the use of alternative targets. This should take into account local circumstances; the need to optimise housing capacity; and scope for the character and form of an area to change over time.
- 8.9.11 The degree of harm on adjacent properties and the daylight targets within a proposed scheme should be assessed drawing on broadly comparable residential typologies within the area and of a similar nature across London. Decision makers should recognise that fully optimising housing potential on large sites may necessitate standards which depart from those presently experienced, but which still achieve satisfactory levels of residential amenity and avoid unacceptable harm.’

BRE Guidance - Sunlight to Existing Buildings:

- 8.9.12 The BRE Guidelines (2011) state in relation to sunlight at paragraph 3.2.11: “If a living room of an existing dwelling has a main window facing within 90

degrees of due south, and any part of a new development subtends an angle of more than 25 degrees to the horizontal measured from the centre of the window in a vertical section perpendicular to the window, then the sunlighting of the existing dwelling may be adversely affected. This will be the case if the centre of the window: Receives less than 25% of annual probable sunlight hours, or less than 5% of annual probable sunlight hours between 21 September and 21 March and Receives less than 0.8 times its former sunlight hours during either period and has a reduction in sunlight received over the whole year greater than 4% of annual probable sunlight hours.”

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

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

BRE Guidance - Open Spaces

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

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

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

8.9.18 *Daylight/Sunlight Analysis*

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

8.9.20 A ‘Daylight & Sunlight Impacts to Neighbouring Properties’ report has been submitted as part of the application and based on proximity to the Proposed

Development, the following properties were identified as relevant for daylight and sunlight assessment (also shown in Fig. 4 below):

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

8.9.21 **Appendix 8** shows properties identified for analysis and their relationship to surrounding properties in respect of the proposed development.

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

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

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

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

Brookdale - 5, 11, 13, 15, 17, 19, 21 and 23
Walker Close - 1, 2, 3, 4, 5 and 6
Arnos Road - 7, 9, 11, 13, 15, 17 and 19

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

Conclusion of Daylight & Sunlight

8.9.26 The deeper assessment concluded that 68.9% of the windows assessed meet the BRE standards and a majority of the remaining windows that do not meet the guidelines are only marginally affected by the proposals, and either continue to achieve a level (20% or more) that GLA guidance considers to be

reasonably good and appropriate in an urban environment or do not currently meet the minimum standard (without the development in place).

- 8.9.27 The assessment found that of the 95 rooms 76.9% fully comply with the criteria set out in the BRE Guidelines. The remaining rooms are predominantly bedrooms where this measure is less relevant as bedrooms are mainly used for sleeping and continue to have a good view of the sky.
- 8.9.28 The APSPH assessment concludes that 83.3% of those windows assessed fully comply with the BRE criteria and the remainder would not be impacted disproportionately when assessed in the context of the urban environment.
- 8.9.29 It is recognised that some reductions are attributable to the design of particular buildings, and whilst there is a breach of the BRE Guidelines in relation to the daylight levels, the retained levels within the property are considered to be appropriate given that the low existing values are causing disproportionate percentage alterations and given the urban grain of the location.
- 8.9.30 In relation to sunlight, as noted above the majority of the properties assessed remain fully compliant with BRE Guidelines (compliance at 89.8% of the rooms assessed). Where there are derogations from guidance are noted, these are relatively minor in nature and there are mitigating reasons for them such as the orientation of the windows and/or property. Notwithstanding, overall the sunlight levels will remain adequate as a result of the implementation of the Proposed Development.
- 8.9.31 Also as noted above some departures to the BRE Guidance occur. However, the deviations are considered to be acceptable when viewed in relation to the location of the site, the quantum of development being proposed and the unique existing scenario of the undeveloped car parks which would by default have little or no impact. As such, any modest size development would have some level of impact.
- 8.9.32 The marginal transgressions when assessed against the BRE guidance are experienced by properties surrounding the site, however still meet the standards set out by the GLA when taking the local urban typology into consideration. The proposed buildings have been located away from the boundaries of the site, which minimises the impacts on neighbouring properties. Furthermore, despite some properties experiencing some transgressions of daylight and sunlight against the BRE standards, this is considered acceptable in the urban environment of Arnos Grove and accords with the standards accepted by the Housing SPG. In accordance with this criteria, the neighbouring properties are considered to achieve suitable levels of residential amenity with the Development in place.
- 8.9.33 In conclusion the impacts of the Proposed Development in relation to daylight and sunlight are considered to be limited given the scale of the development and the urban nature of the local area, with levels of daylight and sunlight in most of the neighbouring residential properties remaining largely unaffected by the proposals.

Overshadowing

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

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

8.9.35 The overshadowing assessment found as follows:

8.9.36 Rear gardens of 1-31 (odd) Brookdale: The Sun Hours on Ground assessment demonstrates that the availability of sunlight to this area will not be materially impacted; The rear gardens all see a minimal reduction ranging from 0.01%-4.33% of the area receiving direct sunlight for at least two hours on the equinox; and All gardens have at least 88%-100% of their area receiving direct sunlight for at least two hours on this date with the proposed development in place, well exceeding the 50% recommendation (in BRE guidelines).

8.9.37 Rear gardens of 1-6 Walker Close: The Sun Hours on Ground assessment demonstrates that the availability of sunlight to this area will not be materially impacted; The rear gardens all see a minimal reduction ranging from 0.00%-0.04% of the area receiving direct sunlight for at least two hours on the equinox; and All gardens have at least 99%-100% of their area receiving direct sunlight for at least two hours on this date with the proposed development in place, well exceeding the 50% recommendation (in BRE guidelines).

8.9.38 Rear gardens of 1-21 Arnos Road: The Sun Hours on Ground assessment demonstrates that the availability of sunlight to this area will not be materially impacted; The rear gardens all see a minimal reduction ranging from 0.04%-6.65% of the area receiving direct sunlight for at least two hours on the equinox; and All gardens have at least 83%-99% of their area receiving direct sunlight for at least two hours on this date with the proposed development in place, well exceeding the 50% recommendation (in BRE guidelines).

8.9.39 Conclusion of Overshadowing

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

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

Privacy, Overlooking and Outlook

8.9.42 Objections have been received in respect of privacy impacts. These include objections received from neighbouring properties along Brookdale and Arnos Road.

- 8.9.43 Several of these objections raise concerns that privacy impacts will be exacerbated by the potential loss of tree. Several the same objections note that the carpark is very busy.
- 8.9.44 Draft London Plan (ItP) Policy D6 notes that development proposals should provide sufficient daylight and sunlight to new and surrounding housing. Adopted London Plan (2016) Policy 7.6Bd requires new development to avoid causing 'unacceptable harm' to the amenity of surrounding land and buildings, particularly in relation to privacy and overshadowing and where tall buildings are proposed. It notes the need for an appropriate degree of flexibility when using BRE guidelines to assess the daylight and sunlight impacts of new development on surrounding properties, as well as within new developments themselves. Guidelines should be applied sensitively to town centres and accessible locations, where BRE advice suggests considering the use of alternative targets – taking into account local circumstances; the need to optimise housing capacity; and scope for the character and form of an area to change over time.
- 8.9.45 The Mayor of London's Housing SPG does not support adhering rigidly to visual separation measures as they can limit the variety of urban spaces and housing types in the city. Standard 28 of the Mayor of London's Housing SPG states that design proposals should demonstrate how habitable rooms within each dwelling are provided with an adequate level of privacy in relation to neighbouring property, the street and other public spaces.
- 8.9.46 Adopted Enfield Policies DMD 6 and 8 seek to ensure residential developments do not prejudice the amenities enjoyed by the occupiers of neighbouring residential properties and Policy CP30 of the Local Plan seeks to ensure that new developments have appropriate regard to their surroundings, and that they improve the environment in terms of visual and residential amenity. Adopted Enfield Policies DMD 6 and 8 seek to ensure that residential developments do not prejudice the amenities enjoyed by the occupiers of neighbouring residential properties in terms of privacy, overlooking and general sense of encroachment. Adopted Enfield Policy DMD10 is silent on this type of relationship, but requiring that development not compromise adjoining sites.
- 8.9.47 The Site is adjacent to Arnos Grove Underground Station partially within a Local Centre and is Urban in character. Whilst the development will be somewhat larger and taller than the existing buildings, it will not be untypical of buildings located in urban locations.
- 8.9.48 The positioning and massing of the buildings has sought to keep taller elements to the north of the site, away from the station and the frontage, as well as away from the neighbouring properties. The topography of the site means that it drops steeply to the north, on both Site A and Site B, reducing perceived height by utilising the downward slope.
- 8.9.49 The Proposed buildings are set away from existing housing so far as possible to minimise any potential for overlooking and/or overshadowing of neighbouring properties. In terms of specific distances, the Proposed buildings are approximately 33.5m away from the rear façade of existing properties on Site A and approximately 34.5m distance on Site B. Communal gardens and access routes have been located to the east and west boundaries consistent with residential fronts and backs.
- 8.9.50 The distances between existing and proposed homes are considered proportionate, within an urban setting. Moreover, currently this is a public car

park allowing people to stand directly to the rear of private gardens of existing homes along Brookdale, Walker Close and Arnos Road. The existing situation results in members of the public having direct views into the rear gardens and in some cases, into the living spaces of existing homes.

- 8.9.51 The proposals include densely planted boundary and fencing to provide security and privacy to adjacent gardens at ground. This proposed arrangement is considered to echo traditional back-to-back gardens, introducing a garden-to-communal green relationship and would reduce direct overlooking into rear gardens at ground level.
- 8.9.52 At upper levels, in addition to the separation distances set out above an 800mm raised sill to windows is used throughout the scheme for bedrooms and secondary windows to living spaces. This provides both greater privacy for future occupiers of the Development and mitigates overlooking of neighbouring gardens. Tightly spaced stanchions are proposed to the lower portion of balconies – to mitigate overlooking.
- 8.9.53 *Summary of Privacy, Overlooking and Outlook.* The siting of the Proposed buildings in relation to nearby occupiers are of enough distance to protect amenity of existing neighbouring occupiers as well as future occupiers of the Development. Communal gardens and access routes have been located to the east and west boundaries of the proposed buildings to echo the traditional fronts and backs pattern found in nearby residential properties. In addition, screening will be provided in the way of planting and fencing to provide further privacy. Screening, fencing and boundary treatments will be subject to approval of details via a planning condition.
- 8.9.54 The proposals include set-backs and buffers in line with Standard 28 of the Mayor of London's Housing SPG – and would not cause unacceptable harm to the amenity of surrounding land and buildings, particularly in relation to privacy and overshadowing.
- 8.9.55 A change in the relationship between the existing homes will take place, which is typical of managed change in an urban location, and not considered significant enough for the development not to be supported particularly as the proposals exceed traditional and past planning guidance 'yardstick' for privacy of 18 – 21m (between habitable room and habitable room).
- 8.9.56 Subject to conditions, requiring full details of the proposed screening and boundary treatment throughout the Site, the Proposed Development is considered acceptable in terms of privacy, overlooking and/or outlook.

Noise and Disturbance

- 8.9.57 Guidance relevant for the assessment of noise affecting new developments is given in the February 2019 National Planning Policy Framework (NPPF). Paragraph 180 sets out that that new development should be appropriate for its location, taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should seek to a) 'mitigate and reduce to a minimum, potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life'.
- 8.9.58 Meanwhile Policy D14 of the London Plan (Intend to Publish) sets out that in order to reduce, manage and mitigate noise to improve health and quality of

life, residential... development proposals should manage noise by, amongst other things: '3) mitigating and minimising the existing and potential adverse impacts of noise on, from, within, as a result of, or in the vicinity of new development without placing unreasonable restrictions on existing noise-generating uses', and '4) improving and enhancing the acoustic environment and promoting appropriate soundscapes...'. Lastly, London Plan (Intend to Publish) introduces the concept of 'Agent of Change' which places the onus on the new development to ensure adequate noise mitigation measures are in place if their development will be close to a noise generating use (in this instance the Arnos Arms is in close proximity and the proposed commercial unit at the front of building A01 has the potential to generate some level of noise).

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

Light Pollution

- 8.9.63 It is recognised that that there is the potential for some level of light pollution arising from the development. Whilst it is acknowledged that a large development will likely generate significantly more light than the existing car parks, a planning condition is recommended requiring details of external light

spill and light spill to internal communal areas to safeguard against adverse impact. In relation to individual residential units, it is not considered light generating from the flats would be unreasonable given they are expected to be used in a normal residential fashion.

Conclusion of Neighbouring Amenity Considerations

- 8.9.64 Objections have been raised by local residents in respect of loss of daylight/sunlight arising from the development. Officers have carefully considered these objections (looking at impacts on the properties listed above) and consider that the impacts would result in acceptable living standards to neighbouring properties. Officers have assessed the impacts in light of NPPF Paragraph 123(c) – which states that local planning authorities should take a flexible approach to in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site (as long as the resulting scheme would provide acceptable living standards). While properties will be impacted, some to a greater degree – on balance, the scheme has been designed to minimise impacts. Officers consider that some microclimatic performance (such as sun-on-ground performance) is very good considering the constraints of the site. Objections have been raised from people remote enough from the Application Site that they are not included in the analysis. As such, taking into account existing levels of light to the properties and the urban context of the site, it is considered that the analysis satisfactorily demonstrates that whilst there are some deviations, these are not significant enough to warrant the scheme unacceptable, particularly in the context of the urban setting of the development, where some impact is expected. This approach is in line with NPPF and BRE guidance and policy and the Proposed Development is therefore considered acceptable in terms of daylight and sunlight impact to neighbouring occupiers.
- 8.9.65 In respect of outlook, privacy and overlooking as outlined above in the siting of the proposed buildings in relation to nearby occupiers are of sufficient distance to protect amenity of existing neighbouring occupiers as well as future occupiers of the Development.
- 8.9.66 With regards to potential noise and disturbance arising from the use/occupation of the development it is noted that there is some level of concern from neighbouring occupiers in relation to this. It is also noted that there is concern that existing noise and disturbance could become worse however as a result of new measures in terms of vehicle movements and drops-offs, and improved building fabric and internal noise mitigation measures, it is considered that the opposite will likely occur. That is, the proposed new measures, will result in a quieter facility, despite the intensification of the use.
- 8.9.67 Notwithstanding the above, subject to conditions pertaining to noise levels and light spill, the Proposed Development is considered acceptable in terms of amenity impact to neighbouring occupiers and is in line with relevant policies DMD 8, 37 & 68, CS Policy 4, London Plan (Intend to Publish) Policies D4, D6 and D14 and existing London Plan Policies 3.5 & 7.15.

8.10 Transport

- 8.10.1 London Plan (2016) Policy 6.1 encourages partnership working in terms of transport and development that reduces the need to travel, especially by car

whilst also supporting development with high levels of public transport accessibility and/or capacity. The policy supports measures that encourage shifts to more sustainable modes of transport. London Plan (2016) Policy 6.13 does not resist the loss of park and ride. London Plan (Intend to Publish) Policy T1 and the Mayor's Transport Strategy set out an ambition for 80% of journeys to be made by sustainable transport modes – that is by foot, cycle or public transport – by 2041. In keeping with this approach, it is accepted that proposed development should support this aim by making effective use of land, reflective of connectivity and accessibility by sustainable travel modes. Meanwhile, the Mayor's 'Healthy Streets' driver looks to reduce car dominance, ownership and use, whilst at the same time increasing walking, cycling and public transport use.

- 8.10.2 London Plan (Intend to Publish) Policy T2 requires development to facilitate and promote short, regular trips by walking or cycling and reduce car dominance. LPItP Policy T6 sets out the requirement for car-free development to be the starting point for all sites well-connected by public transport. LPItP Policy T9 notes that where development is car free, provision must be made for disabled persons parking and adequate space for deliveries and servicing and, in instances where a car-free development could result in unacceptable impacts off-site, these should be mitigated through planning obligations.
- 8.10.3 Core Strategy (2010) policies aim to both address the existing deficiencies in transport in the Borough and to ensure that planned growth is supported by adequate transport infrastructure that promotes sustainable transport choices. Specifically, Core Policy 25 requires development to prioritise pedestrian and cycle public realm improvements that contribute to quality and safety; Core Policy 24 requires development to deliver improvements to the road network, and Core Policy 26 requires development to ensure a safe, accessible, welcoming and efficient public transport network. The underlying approach is to ensure that travel choice across the Borough is enhanced so as to provide everyone with the opportunity to decide how they choose to travel, be that by car, public transport or walking and cycling. Development Management Document (2014) Policy DMD 45 Parking Standards and Layout states that the Council aims to minimise car parking and to promote sustainable transport options.
- 8.10.4 NCAAP Policy 17 established that the site has potential to be released for redevelopment. The supporting text to the policy also acknowledges this potential loss, stating that: *'if redevelopment would result in a reduction in the provision of public parking at this key interchange a clear justification for this loss would be required. That said, it is noted that a reduction in car parking would align with the policy direction of the Mayor's London Plan and transport Plan in terms of encouraging travel by sustainable modes of transport'*.
- 8.10.5 In this respect, the principle of the loss of public car parking at this location has been established in adopted development plan policy. The weight of NC Policy 17 (Arnos Grove Station – Site 7) is greater than that of the guidance within the New Southgate masterplan. Enfield Council's New Southgate Masterplan states at Page 51: *'Development on the station car parks at Arnos Grove should only take place if suitable replacement parking facilities are made available or current levels of car parking at Arnos Grove Station are maintained. If car parking was to be reduced as a result of redevelopment at the station this would need to be informed by a detailed study to demonstrate that reduced car parking would not lead to an increase in on-street commuter parking'*. Page 53 of the Masterplan states: *'Existing station car parking spaces could be consolidated to the car park east of the station to allow development on the western car park'*.

8.10.6 Existing and proposed car parking provision is as follows:

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

8.10.7 The car parking assessment set out below broadly considers: the loss of the public station car park (apart from blue badge spaces); and the proposed 'car-free' approach in respect of the residential development (apart from blue badge spaces). Officers have also considered mitigation to incentivise and support sustainable behaviours.

Loss of existing public car parking

8.10.8 Significant objection has been raised from the consultation process in relation to the loss of the public car park.

8.10.9 The loss of 297 no. public car parking spaces (non-blue badge) will mean car park users either: find alternative ways to travel to their destination; park outside the existing Controlled Parking Zone, or inside if able; or relocate to other stations. Officers have scrutinised five sets of information / data / surveys to assess existing carpark use, consider the likelihood of potential behaviour change and understand the type of mitigation to secure in order to best support the modal shift proposed.

8.10.10 **Car park utilisation:** The Applicant has submitted a Transport Assessment in support of the application. The TA includes car parking data (recording entry / exits) and entry and exit surveys to demonstrate the utilisation of the car park.

8.10.11 The Applicant has referenced a 'head-line' figure for weekdays and weekends (details below), stating that utilisation pre Covid-19 was up to 75%, and around 40% at the weekend, with the western car park typically fuller. During Covid-19 it is noted that Transport for London's car parks are operating at approximately 10% utilisation on a typical weekday.

8.10.12 Two sets of data have been collated by the applicant to understand car park utilisation.

- NCP car parking data for the recorded number of entry and exits received for the Arnos Grove Car Parks during a week in April 2019 and November 2018.
- Entry and exit surveys at Arnos Grove Car Parks on Thursday 10th October and Saturday 12th October 2019.

8.10.13 The utilisation rates were calculated based on the number of spaces in both the eastern and western NCP car parks at Arnos Grove NCP car park. This shows that the highest utilisation of the car parks in the NCP data for Arnos Grove are:

	Weekday	Weekend

April	53%	40%
November	43%	53%

8.10.14 The NCP data above was then supplemented with additional car parking entry and exit surveys to allow disaggregation of the data for the two car parks. These surveys were undertaken on Thursday 10th October and Saturday 12th October 2019. The survey data is included in at Appendix C of the submitted Transport Assessment, and in summary car parking utilisations was shown as:

	Weekday (10/10/2019)	Weekend (12/10/2019)
Eastern Car Park	57%	33%
Western Car Park	90%	50%
Combined	75%	42%

8.10.15 This demonstrates that the car parks are not fully occupied. The data supports Officers assessment that the car parks represent under-utilised brownfield land. In accordance with the NPPF, planning decisions should give substantial weight to the value of using suitable brownfield land within settlements (particularly where land supply is constrained) where housing supply to bring forward delivery of new homes, including through the more effective use of car parks (NPPF para 118).

8.10.16 **Blue badge parking space utilisation:** The Applicant has reviewed existing blue badge parking utilisation for the six existing blue badge parking bays located in the western station car park. The usage of the car park was surveyed on Thursday 10th October 2019 and Saturday 12th October 2019. The survey demonstrated that the peak utilisation of the blue badge car parking bays was 4 no. of the 6 no. bays being used (see **Appendix 14**). The average utilisation throughout these survey days was lower and the survey data is included in the Appendices.

8.10.17 In addition to the survey data, the usage of the blue badge parking bays has been photographed at various times during the project. These all show that there was not 100% utilisation of the spaces. These show that there were either one or two spaces not occupied when the photos were taken. The Applicant has also made enquiries – and TfL does not have any information which points to insufficient blue badge provision at this station. The applicant has confirmed that TfL has also looked at how the level of disabled parking compares with other car parks across its portfolio of a similar scale to Arnos Grove car parks. This review has shown that the level of disabled parking provided is fairly consistent, averaging around 6 spaces (as at Arnos) or around 2% of overall provision.

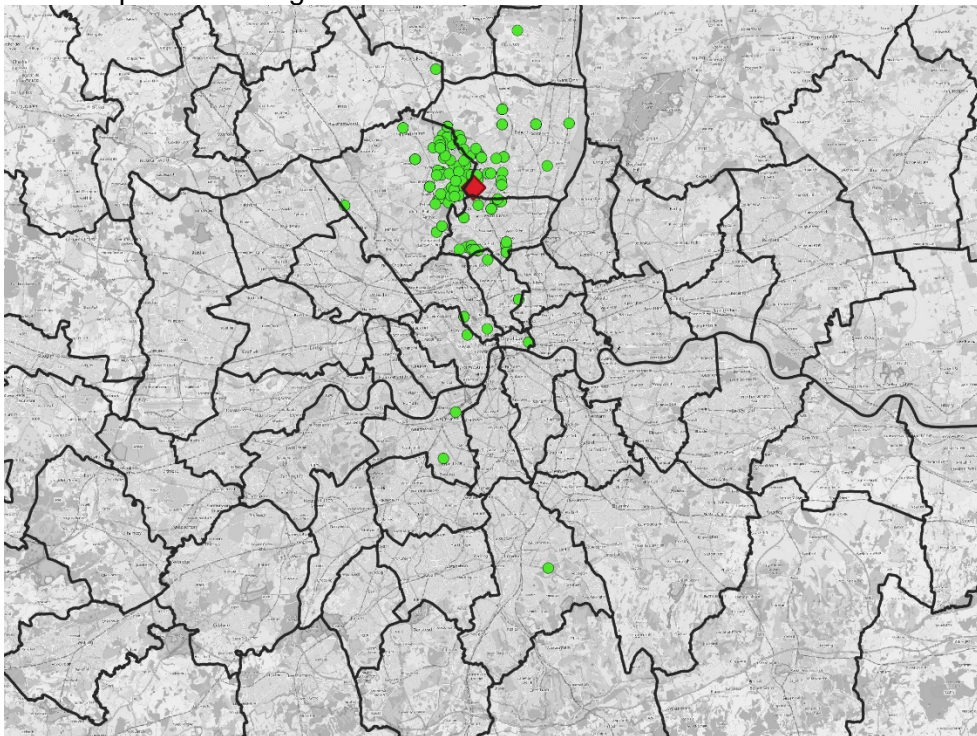
8.10.18 Officers consider there is sufficient evidence to demonstrate that re-provision of 6 no. blue badge parking spaces is sufficient to respond to need at this station.

8.10.19 **User surveys (origin and purpose):** The submitted Transport Assessment also explains that user surveys of the car park were undertaken (Tracsis) between 26th June 2018 and 30th June 2018. The surveys indicate that the main trip purposes for the users were for travel to/ from work (weekdays) and leisure (weekends). Review of the trip origin data in the survey responses are tabulated below.

5%	trip origins outside M25
33%	within walking distance of an underground station, and 50% within walking distance of a national rail station
68%	within walking distance of a bus route that serves Arnos Grove Station
1.2%	are more than 960m away from any other station, or 640m away from a bus stop for a route which serves Arnos Grove Station.
46%	have their trip origin inside the London Borough of Enfield
32%	have their trip origin inside London Borough of Barnet

8.10.20 Origin data is also shown diagrammatically below – illustrating trip origins from across London.

Car park user 'origin' data



8.10.21 The surveys indicate the majority of survey respondents have alternatives to parking at the station available to them. The surveys also indicate that most car park user origins are outside Enfield.

8.10.22 **Representations received:** Officers also undertook an analysis of objections (received from public and neighbours who have provided a postcode). This indicates that approximately 79.7% of those objecting provided a postcode (likely home address) located 10 minutes or less walking distance from an Underground Station or Overground Station or National Rail train station. Almost 50% are within 5 minutes or less walking distance from an Underground Station or Overground Station or National Rail train station. Analysis of representation postcodes is broadly aligned with survey data submitted by the Applicant in respect of potential origin locations of residents / car park users who stand to be impacted by the proposal – indicating that most live in locations where alternative sustainable travel options are available.

- 8.10.23 **Local proximity of underground and national rail stations** (options available to local car park users and residents): Officers have also considered the area around Arnos Grove (south-west Enfield) to understand alternative options available to residents and car park users in the local area. A high-level spatial analysis of south-west Enfield has been undertaken. This is visually represented below and indicates that residents within south-west Enfield have a relatively high number / multiple underground or national rail station options available in the area.

Proximity of underground and national rail stations

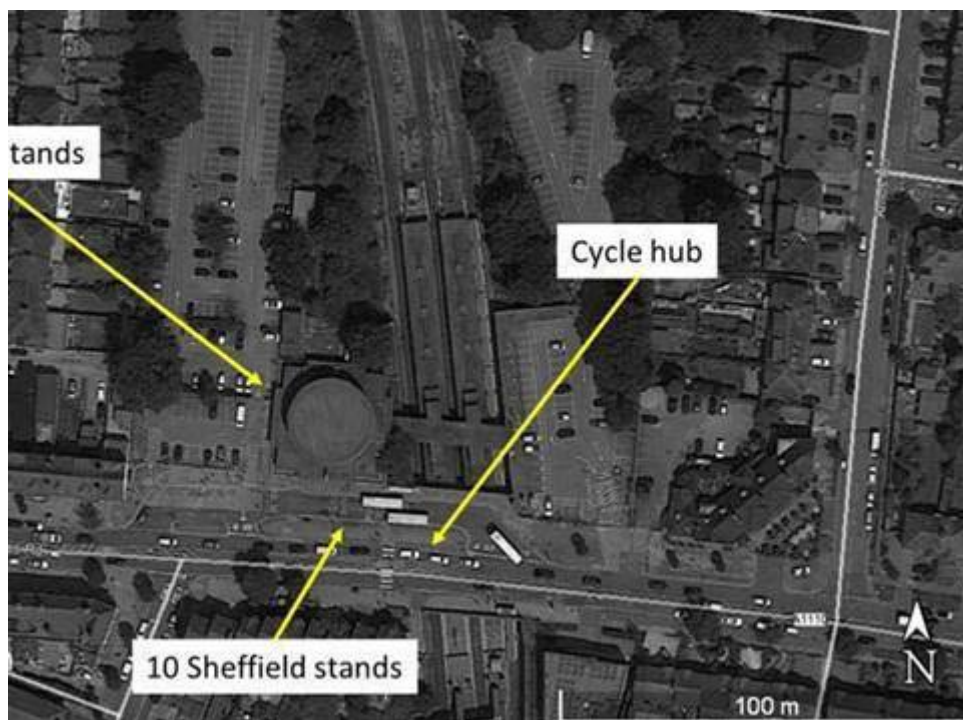


- 8.10.24 Most homes are within walking distance (960m or c.1/2 mile) of at least one of 6 x underground or national rail stations. In some cases, homes have 2, 3 or 4 underground or national rail stations within walking distance. This is at least comparable with, and in some cases better than, options available within similarly sized catchment areas in 'Inner' or 'Middle' London. It shows that in this area of south-west Enfield, underground and national rail stations are not 'spaced out'. This analysis has not considered bus services and routes, which would be supplemental to the underground and national rail options available in south-west Enfield.
- 8.10.25 In respect of the specific site, it is directly adjacent to the London Underground Station and has a PTAL rating of 4 to 6a (with 6a being excellent) with access to the Piccadilly line and good bus connections including a bus interchange at the front of the Site. There are four bus stops in the area: stops U, T, A and B, which serves routes 34, 184, 232, 251, 298, 382 and N91 which provide connections to destinations including Palmers Green, Walthamstow Central, Barnet, Turnpike Lane Station, Potters Bar, Edgware Road, and Southgate. A wide catchment area is served by the bus routes. The bus interchange is currently used for through routes and terminating routes. There are local cycle routes along the northern side of the A406 and through Arnos Park (connecting to Ashridge Gardens).

Cycle Parking Provision

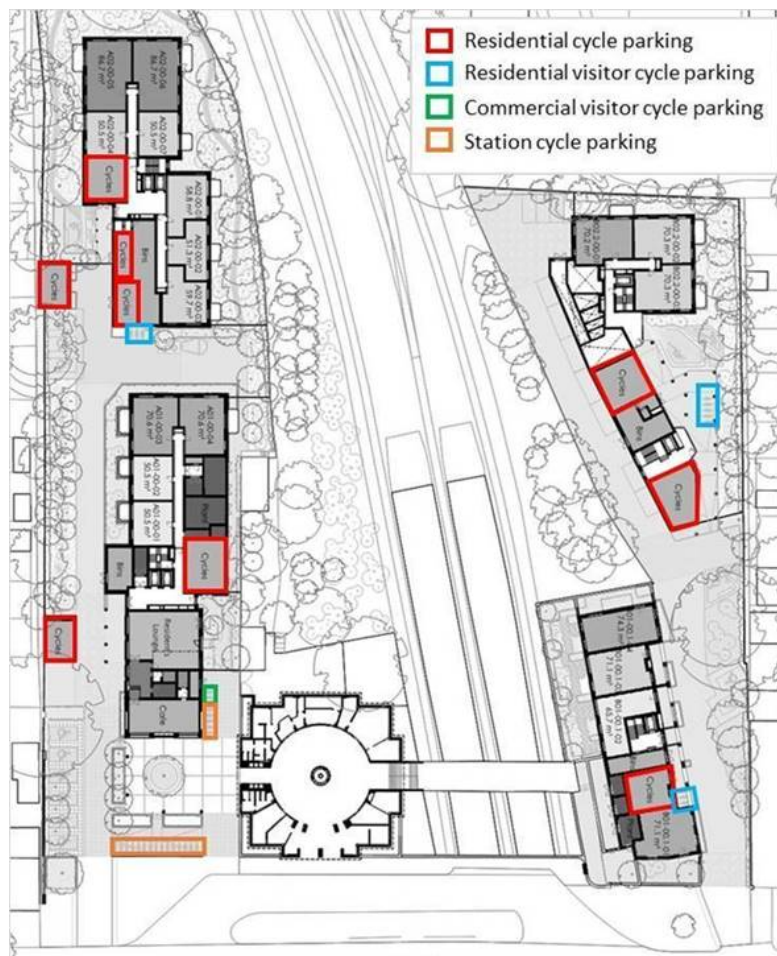
- 8.10.26 Public cycle parking spaces are proposed to be more than doubled (from existing provision of 38 no. public cycle parking spaces to 76 no. public cycle parking spaces). The Applicant has provided details of indicative re-provision and dispersal of these cycle spaces, which includes 40 no. cycle parking spaces within the proposed public square and adjacent to the proposed commercial unit. The Applicant has committed to providing 5% of total public cycles spaces as non-standard cycle parking spaces.
- 8.10.27 *Existing provision:* The Application Site includes 38 no. public cycle parking spaces. The station has 22 no. spaces and a further 16 no. spaces have recently been provided in a cycle hub outside the site. Existing public cycle parking provision is set out below.

Location	No. of public cycle parking spaces
Adjacent to station building	2 (2x cycle stands)
Station Interchange	20 (10 x Sheffield Stands)
Station Interchange (Enfield Cycle Hubs)	16 (2 x cycle hubs)
Total spaces	38 spaces



- 8.10.28 *Proposed cycle parking provision:* Proposed public cycle parking provision is set out below. It includes 10 no. new cycle parking spaces for the proposed commercial unit plus 30 no. cycle parking spaces in the proposed public square. It is expected that some linked trips may exist between the station and the commercial unit.

Location	No. of cycle parking spaces
Station Interchange	20 (10 x Sheffield stands) – retained / re-provided
Station Interchange (Enfield Cycle Hubs)	16 (2 x cycle hubs) – retained / re-provided
Public Square	30 (15x Sheffield stands)
Adjacent to commercial unit	10 (5 x Sheffield stands)
TOTAL SPACES	76 spaces



8.10.29 While it is expected that some linked trips may exist between the station and the commercial unit London Plan requirements are for 6 spaces (short stay) and 1 space (long stay) for the retail, and 3 spaces (short stay), and 1 space (long stay). The Applicant has explained that when broken down, this leaves 6 spaces for the commercial unit, and 40 spaces for the station. Officers consider that this is acceptable in principle, subject to a condition requiring further details. 5% of cycle parking spaces proposed will be dedicated for non-standard cycles – representing an increase from current nil provision. These would include spaces which are accessible and make provision for adapted and large cycles

Impact on local residential streets

- 8.10.30 Objections have been received raising concerns in respect of potential extension of the existing Controlled Parking Zone. Officers have secured contributions towards studies to determine if an extension should be pursued, which would be subject to consultation. As assessed above, the potential to implement parking controls is in line with adopted DMD Policy 45. Residents would have an opportunity to support, or otherwise, any proposed CPZ extension.
- 8.10.31 It can be assumed that the development will lead to an increase in pedestrian / bus/ cycle trips to the station. Officers also consider that it is more likely that trips will fall, with some commuters using alternative routes to work as it becomes too inconvenient to park close to the site due to the existing CPZ. There is a degree of confidence in predicting commuters will not park and walk through the existing CPZ. The extent of the existing Controlled Parking Zone is already relatively expansive. Officers consider it is more likely that alternative options would be considered before consideration is given to driving to Arnos Grove and parking outside the CPZ.
- 8.10.32 Officers have also considered the character of existing streetscapes, including existing constraints on parking outside the existing CPZ. These constraints include the number of roads with dropped kerbs, footway crossovers and limited parking opportunities. There are also barriers such as the A406, making navigation difficult. Officers consider the existing combination of wider site characteristics mean displaced parking is unlikely.
- 8.10.33 Officers have recommended survey measures be secured to enable the Council to monitor the situation. These surveys will include data showing the baseline level of parking currently taking place outside of the CPZ; these results can then be compared with further surveys undertaken if the car park was closed. Officers have secured mechanisms with the Section 106 legal agreement to monitor this and if necessary, seek mitigation from the developers – including a financial contribution if triggered to facilitate consultation and potential changes to the existing Controlled Parking Zone.

Conclusion – proposed public car park loss

- 8.10.34 In assessing the proposed loss of the public car parking spaces (except for blue badge spaces) and the scheme generally, Officers have carefully considered and had due regard to the need to eliminate discrimination and advance equality of opportunity, as set out in Section 149 of the Equality Act 2010.
- 8.10.35 Officers assessment, and recommendation, has given due regard to the Public Sector Equality Duty and the relevant protected characteristics. Officers assessment includes consideration of benefits of the scheme, which locally and specifically include improved blue badge space design, layout, lighting and surfacing, improved public realm (design, layout, lighting and gradients) within the scheme and increased and improved public cycle parking – including 5% of cycle parking spaces dedicated for non-standard cycles (see also Section 8.20 below).
- 8.10.36 Officers have assessed the loss of the car parks will result in varying degrees of impact. Some of these impacts have potential to be adverse, and Officers have secured and recommended appropriate mitigation. Officers have assessed that impacts are, on balance, acceptable subject to

appropriate mitigation, based on the following together with Section 8.20 below.

- 8.10.37 **the benefits of the scheme:** these are set out and summarised at Section 1 of this report and assessed in detail throughout. Officers consider that these outweigh the impacts on the proportion of private car users who would lose access to the two existing car parks;
- 8.10.38 **Existing Enfield travel behaviours:** Census data shows that 33% of households in Enfield have no access to a car or van³ – meaning their existing travel behaviours are already likely to be sustainable as they would tend to use public transport, walk or cycle. The Planning Inspectorate has noted the proportion of outer Londoners who do not own a car is ‘likely to increase particularly in the more accessible areas’⁴.
- 8.10.39 **Existing Arnos Grove car park users (credibility of behavioural change):** Officers have reviewed the survey and utilisation data submitted in support of the application and concluded that the data indicates that almost all existing car park users have potential to choose alternative routes. 2 no. existing Transport for London taxi drop-off bays are located within the interchange – and the Applicant has committed to their re-provision. Officers have also secured a commitment from the Applicant to work with the council to provide a drop-off location following closure of the existing car park, and during the construction phase. This would be monitored during the construction period – and would be subject to a future decision on arrangements. The obligation would be secured by Section 106 agreement and include a cascade mechanism.
- 8.10.40 **Housing, including affordable housing priorities, balanced against parking:** Housing, including affordable housing need is an Enfield and London-wide priority. Parking availability does not impact all Enfield households – as noted above 1 out of 3 households in Enfield have no access to a car or van.
- 8.10.41 **Policy priorities and weight:** Enfield adopted policies are clear in emphasising the priority placed on delivering high-quality housing, including affordable housing. The same policy weight and protection does not exist in respect of under-utilised car parking. Adopted London Plan and emerging London Plan (ItP) policies give weight to the use of underutilised sites, such as car parks, for new housing. In respect of the Mayor of London’s emerging transport policies the Planning Inspectorate has stated that they were ‘satisfied there is clear and compelling evidence to justify the approach to car parking set out in the London Plan’ and noted that ‘In outer London, even now 1/3 of households do not own a car, and this proportion is likely to increase particularly in the more accessible areas’.
- 8.10.42 In questioning whether the Mayor of London’s emerging transport policies (Policies T1 to T6.5 and T9...and the cycle and car parking standards were justified and consistent with national policy...and effective) the Planning Inspectorate concluded that their ‘Successful implementation would reduce car journeys; reduce road traffic kilometres; reduce road congestion and rail crowding; improve bus speeds; and reduce each of the four key emissions affecting air quality and climate change (carbon dioxide CO₂, nitrogen

³ Census 2011, QS416EW - Car or van availability, population All households; All cars or vans, units Households, area name Enfield

⁴ Report of the Examination in Public of the London Plan 2019 – Report to the Mayor of London, The Planning Inspectorate (Members of the Panel appointed by the Secretary of State), Date: 8 October 2019

oxide NOx, and particulate matter PM2.5 and PM10)'. That subject to the Planning Inspector's recommendations, Policies T1 - T6.5 and cycle and car parking standards 'are justified and consistent with national policy'⁵.

- 8.10.43 **Enfield's current corporate and statutory commitments towards the Mayor of London's Transport Strategy targets:** Encouraging sustainable travel options supports Enfield in achieving the Mayor of London's target to increase active and sustainable modes across London to 80%. Enfield receives annual funding from Transport for London to deliver the Mayor's Transport Strategy outcomes within Enfield through a funding and programme process known as a Local Implementation Plan. The LIP is a statutory document arising from the GLA Act 1999. Each borough's LIP covers proposals to implement the Transport Strategy of the Mayor of London (MTS), locally within the area of each borough.
- 8.10.44 **The Climate Emergency and Enfield's Climate Action Plan 2020:** Enfield Council's Cabinet declared a state of climate emergency in July 2019. Emissions from transport in Enfield account for an estimated 39% of the borough's total emissions. Shifting movement to low carbon transport, prioritising walking and cycling, will achieve the Mayor of London's target to increase active and sustainable mode share across London to 80%. It is also an important part of delivering the UK's commitment to have net zero emissions by 2050.
- 8.10.45 Officers have concluded that while the loss of 297 no. public car parking spaces would have some impact on London residents, and a minority from outside of the M25, the submitted surveys suggest that most users have the potential to use alternative transport modes to either get to the station, or to alternative stations. A suitable Section 106 package towards local improvements and other measures to support the modal shift.

'Car-free' residential scheme

- 8.10.46 Objections have been received questioning the credibility of the 'car-free' approach (except for blue badge parking) in respect of the residential proposals. Objections have also been received questioning how residents will be prevented from accessing parking permits and stating concerns that future residents could apply for resident permits. Some objections raise concerns in respect of potential extension of the existing Controlled Parking Zone. Several objections either request or raise concerns that the proposal will result in residents parking in the forecourt of their houses.
- 8.10.47 Except for blue badge spaces (see below), the proposed development would be 'car free'. 'Car free housing development' is supported in emerging LPItP policy and Enfield DMD Policy 43, subject to conditions and Section 106 obligations, where sites have good access to public transport services and are located within or near a designated town centre. Officers have assessed the scheme against three main criteria when considering the credibility of the car-free approach for this specific proposal in this specific location. These three criteria are the site; evidence of the likely future occupants; and the mitigation that Officers recommend be secured (incentives and disincentives).
- 8.10.48 **Site location:** The site is situated directly adjacent to a tube station and bus interchange – providing a robust case for a car-free development. This

⁵ Report of the Examination in Public of the London Plan 2019 – Report to the Mayor of London, The Planning Inspectorate (Members of the Panel appointed by the Secretary of State), Date: 8 October 2019

is a unique site, where the walking distances involved in accessing a tube station would be equivalent to accessing any resident car parking within the scheme, were it to be proposed within the scheme. The site is also located within/adjoining a local centre, with existing amenities. The site characteristics are aligned with limbs a) and b) of Adopted Enfield DMD Policy 45(4).

- 8.10.49 **Future occupants:** As noted above, Officers have considered post-occupancy surveys of higher density schemes – including Build to Rent occupants⁶. This has included consideration of the likely car ownership of future occupants of the proposal. The evidence of completed Build to Rent and higher density schemes supports a view that there is an element of ‘self-selection’ in respect of occupiers who live in higher density rental homes, whereby residents who choose to live in higher density rented housing in areas with good transport accessibility are less likely to own a car. Generally, post-occupancy surveys also show that tenants are less likely to have access to a car. Whereas shared ownership occupants and owner-occupiers are most likely to have cars.
- 8.10.50 The scheme is a Build to Rent scheme, which would not include shared-ownership or owner-occupiers. Future residents are therefore more likely to have lower car ownership, than would be the case if the scheme included shared ownership or market sale homes.
- 8.10.51 The same research indicates a shift in priorities / expectations for residents of higher density schemes, including Build to Rent, in respect of car parking and car ownership. Recent research shows little mention of cars, compared with previous research into higher density London neighbourhoods. A trend towards reduced car ownership, including in outer London, is also considered likely (see above) – particularly in the more accessible areas’.
- 8.10.52 **Mitigation, including incentives and disincentives:** Officers have recommended securing restrictions on future residents obtaining parking permits. These would be secured in the Section 106 legal agreement, meaning that future occupiers of the development would not be issued with parking permits for parking within the existing Controlled Parking Zone. The Applicant has also confirmed this would be further reinforced through tenancy contracts.
- 8.10.53 Additional measures proposed to be secured by the Council through Section 106 legal agreement will be a financial contribution towards the provision of a car club to provide access to shared mobility options. The provision would be dealt with through a fund provided by the applicants and comprise a fund of up to £15k being made available by the applicant to fund car club membership fees for residents during the first 3 years following first occupation.
- 8.10.54 Officers have secured a sustainable transport package (with financial contribution) – to be directed towards supporting and incentivising sustainable behaviours. The allocation scope includes potential to direct funds towards: Car Club Membership; car club driving credit per home; an Oyster or Cycle Voucher. Travel Plan monitoring, commitments to review, appointment of Travel Plan Coordinator and monitoring of Travel Plan initiatives are also recommended to be secured by Section 106.

⁶ Residents’ experience of high-density housing in London (LSE London/LSE Cities report for the GLA). June 2018.

- 8.10.55 **Adopted and emerging policies (Active Travel Zones and Healthy Streets):** A Healthy Streets Design Check is a requirement of the London Plan (Intend to Publish) Policy T2. This requires developments reduce the dominance of vehicles and deliver improvements that support the ten Healthy Streets Indicators. As set out at Section 8.20 below NPPF Paragraph 110 supports giving priority first to pedestrian and cycle movements.
- 8.10.56 The submission documents confirm that a Healthy Streets Design Check has been undertaken as required by London Plan and found that the Proposed Development result in a 24% increase in the Healthy Streets score from an average of 53% to 77%. Key improvements result from the provision of a new public square including benches and green space, providing opportunities for social integration and recreation and improvements to the streetscape. Indicators with the highest improvement score include shade and shelter, and places to rest.
- 8.10.57 **Blue badge:** 5 residential blue badge spaces are proposed, with additional passive provision (+11 passive). Blue badge spaces are proposed to meet minimum dimensions and can be accessed and egressed in a forward gear. Electric car charging points will also be available within the blue badge holder spaces.

Conclusion – ‘car free’ residential development

- 8.10.58 The proposed car-free aspect of the residential development are assessed to be supportable, given the location of the site, directly adjacent a tube station and bus interchange with bus routes serving a wide catchment area and the site’s location in an existing CPZ area and near shops. Officers are confident a robust package of disincentives and incentives would be secured to support a car-free approach for this specific scheme at this specific location. Disincentives include: the existing CPZ (distance required to park outside); s106 obligations with potential to secure potential CPZ extension; restrictions on parking permits. As noted adopted DMD Policy 45 allows for limited or ‘car free housing development’. The policy states that applicants may be required to contribute towards implementation of parking controls to prevent on-street parking and that residents in the new development may be prohibited from obtaining a parking permit. Officers have recommended conditions and Section 106 obligations be secured to prevent future residents from obtaining parking permits.

Existing Public Transport Capacity

- 8.10.59 In terms of existing public transport capacity, the submitted Transport Assessment has identified a potential average increase of 2 to 3 people on each bus service during the morning and evening peak, which is considered to have a negligible impact on public transport capacity. Minor improvements will be made to the bus interchange in the way of the relocation on one bus stop to allow for associated works to the public realm and pedestrian and cycle infrastructure.

Servicing and Deliver

- 8.10.60 The submission documents include a Delivery and Service Plan (DSP) which contains relevant detail in relation to how the site will be serviced via service roads for refuse & deliveries etc. Both sides of the Site will be serviced by the access roads running through the Proposed Development.

The DSP shows the tracking diagrams for deliveries from a transit van, which can enter the site from Bowes Road and turn and exit in a forward gear. The tracking also includes a fire tender, which is the largest vehicle likely to require access, and therefore confirms that future large refuse vehicles can also access and egress the site.

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

Delivery trip estimates

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

- 8.10.62 Deliveries are not expected to be significantly high, and it is noted that the site makes an allowance for delivery vehicles to access and turn within the site. This consideration is welcomed as the site is based on a busy classified road and forcing delivery vehicles to park on the highway would not be acceptable.
- 8.10.63 Whilst the figures are noted as being quite low in absolute terms, it is considered the layout of the site could accommodate occasional increases in the number of predicted deliveries if required.
- 8.10.64 The front of the site outside the station will remain functioning as a bus interchange. There are some alterations proposed, which have been reviewed and agreed by TFL and satisfies the Council's Traffic & Transportation team. It is noted the changes are to relocate the bus stop and taxi bays, and to shorten the length of the existing stopping area to facilitate more public space.
- 8.10.65 Some level of concern is noted in relation to vehicles still attempting to park at the station for drop offs. Whilst this will need to be controlled within the bus interchange by enforcement measures, there may be a wider impact of vehicles dropping off elsewhere but close to the station. This impact will be monitored post implementation and this monitoring will be secured within the Section 106 legal agreement.

Existing pedestrian and cyclist safety

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

Highway, pedestrian and cyclist safety

- 8.10.68 Representations have been received objecting on the grounds of pedestrian and highway safety in respect of road accidents within the vicinity of the site, including requests for traffic calming along Bowles Road to reduce road accidents. Objections received state that the proposals will increase circulating traffic on Bowes Road and surrounding streets, increase pollution, noise disturbance and adversely affect pedestrian and cyclist safety.
- 8.10.69 As noted by the Bowes Road Resident Group, the Applicant's submitted Transport Assessment notes that there is scope for improvements to local safety for pedestrians and cyclists. The Officer assessment accords with Bowes Road Resident Group and comments within the submitted Transport Assessment on this point. As assessed below, the Healthy Streets approach seeks to reduce the dominance of vehicles and deliver improvements that support ten Healthy Streets Indicators. The Mayor of London's approach (LPItP) to supporting sustainable transport requires a Healthy Streets Design Check pursuant to Policy T2 (LPItP).
- 8.10.70 The Healthy Streets Design Check undertaken by the Applicant's Transport consultants indicates an existing Healthy Streets score for the area is an average of 53%. The proposed development is assessed to increase this score to 77%. Furthermore, the Applicant's submitted Transport Assessment has identified scope for local improvements, including in respect of Bowes Road pedestrian and cycle environment. Officers have sought to secure contributions that can be directed towards local cycle and pedestrian improvements.
- 8.10.71 Objections reference collision data within the Applicant's submitted review of the Transport for London collision data (for the five-year period available up to 31 December 2018). The details show that out of 65 collisions within the study area, that 64 of these collisions are considered resultant of driver error – 27 accident being due to drivers failing to look properly, 19 accidents being due to drivers being careless / reckless / in a hurry. One collision was identified as being potentially influenced by the highway layout. This collision was not within the site frontage, occurring on Oakleigh Road South junction with Friern Barnet Road.
- 8.10.72 The Mayor of London's Vision Zero Action Plan focuses upon reducing road danger, including deaths and injuries, on London's roads and streets. This aims to make London a safer and healthier place that promotes Active Travel. The site is currently a car park with high vehicle flows in, out and within the area, and therefore people walking may feel unsafe and worry they could be involved in a collision with a motor vehicle.
- 8.10.73 The Applicant undertook a car park survey in 2019 which indicated that 834 two-way vehicle movements occurred on an average weekday, with a corresponding peak utilisation of 75%. Removing the car parks at Arnos Grove would result in a reduction of approximately 725 journeys within this vicinity.
- 8.10.74 A user survey was undertaken at Arnos Grove car park and this showed that 68% of the car park users lived with walking distance of a bus route that serves Arnos Grove Station. Therefore potentially 68% of the 834 two-way daily movements could have been undertaken by bus, which equates to 567 daily bus trips.

Vehicular Access

- 8.10.75 Access is provided from two revised access points: one on the east and one on the west. The access points have regard for visibility splays from the 'Manual for Streets' standards which require a 43m visibility splay either side of the access, from 2.40m behind the access. These are shown on the plan AG-102384-T-102 of the submitted drawings. These access points are considered acceptable in principle.

Summary of Transport Considerations

- 8.10.76 The application proposes to replace the existing car parks on Sites A and B with a good quality car-free residential development in a highly sustainable location. The proposed car-free development on a Brownfield site in a highly sustainable location aligns with the aspirations of adopted and emerging planning policy, as well as to the Borough's commitment to becoming a carbon neutral borough by 2040.
- 8.10.77 The removal of car parking, and provision of infrastructure on site to support sustainable travel modes, such as walking, cycling and electric car charging will encourage a positive change to patterns of travel behaviour towards low and zero carbon modes, in line with current and emerging policy requirements.
- 8.10.78 In light of the above assessment it is considered that whilst there would be some level of impact during a transition from the existing car dominant situation towards a proposed more sustainable situation, this impact is not sufficient to render the proposal unacceptable.
- 8.10.79 Officers have scrutinised the submission documents and are satisfied that the proposed development is acceptable in terms of its impact on the local transport network, meeting policy requirements including Enfield DMD 45 and Core Policies 24, 25 and 26; current London Plan Policy 6.1; and emerging London Plan Policies (Intend to Publish) T2, T6 & T9 and, where necessary, providing appropriate mitigations. As also mentioned above the Section 106 agreement will include clauses for surveys to ensure any post-construction impacts are reviewed and mitigated where necessary. The development does not raise any issues which would be significantly prejudicial to highway safety or the free flow of traffic on the public highway and according to trip rate forecasts, will have a positive impact on the number of vehicle trips. The detailed Section 106 requirements are listed towards the end of this report.

8.11 Trees and Metropolitan Open Land

- 8.11.1 Policy G7 of the London Plan (Intend to Publish) requires existing trees of value to be retained, and any removal to be compensated by adequate replacement, based on the existing value of benefits. The Policy further sets out that planting of new trees, especially those with large canopies, should be included within development proposals.
- 8.11.2 Enfield Policy DMD80 stipulates that developments do not result in any loss or harm to trees of significant biodiversity or amenity value, or adequate replacement must be provided whilst the Enfield Issues and Options Plan outlines the benefits that trees offer to people and the environment by improving air quality, reducing noise pollution, contributing to climate change adaptation and reducing the urban heat island effect.
- 8.11.3 Appendix 15 illustrates the location of existing trees, and those proposed to be removed. These details are shown tabulated below.

Table 1: Trees/Groups in each Retention Category

BS Category	No. of individual Trees	No. of Tree groups	Total
A	0	0	0
B	33	1	34
C	35	13	48
U	2	0	2

Table 2 – Tree Features Proposed for Removal by BS Category

Category A Trees/Groups	Category B Trees/Groups	Category C Trees/Groups	Category U Trees/Groups
0	T34, T69	G4, T9, T29, G31, G32, T33, T39, T40, G42, T43, T45, T46, T47, T50, T51, T66, G80, G84	T8, T68
0	2	18	2

- 8.11.4 There are no Category A trees on site. In respect of Category B trees, out of the 33 individual trees which exist on site (plus 1 group) – 2 individual trees are proposed for removal. In respect of Category C trees, out of the 35 individual trees and 13 tree groups proposes on site– 18 no. are proposed for removal. 2 no. Category U trees are proposed to be removed.
- 8.11.5 Officers are satisfied that tree retention has been maximised, particularly in respect of Category B trees – and particular in respect of the impressive and largest of the existing mature trees which provide significant amenity benefit. Subject to conditions, Planning Officers are also satisfied in respect of the protection of trees 60 and 61 (subject to a Tree Preservation Order and located to the north of Site B, outside the application boundary to the north).
- 8.11.6 Several trees along the eastern boundary of Site B are proposed for removal – and Officers have scrutinised these details closely. The Applicant proposes that in respect of the 9 no. Category C trees proposed for removal along the eastern boundary of Site B, 13 no. new trees will be proposed, all of which are proposed to be specified as ‘Screen Trees’ (English oak, birch trees, pine trees or similar). These details are set out in the submitted Planting Plan details which Officers recommend securing by way of condition. The proposed trees are intended to recreate the screening effect that currently exists in this location.
- 8.11.7 Officers have explored whether the 9 no. Category trees in this location could potentially be retained. Officers are satisfied that replacement screen planting is appropriate in this instance – as the trees clash with the building footprint of Block B2 and having regard to the lower category of the tree (Category C). The footprint of Block B02 is partially informed by the irregular shape of the site and the need to retain continued and essential LUL track access to the Piccadilly line.
- 8.11.8 Officers have provided comments querying the proximity of several trees in respect of the proposed buildings and balconies. The Applicant has

undertaken an enhanced technical assessment during the design phase, using expert advice to analyse the trees within the site and ensure that all trees proposed for retention are capable of being kept. This has included a Radar survey to fully understand the root systems to give a greater level of certainty around tree protection. Officers are satisfied with the extent of tree retention, particularly in respect of Category B trees.

- 8.11.9 73 no. new trees are proposed to be planted, resulting in a net gain of 28 trees, which will mean an overall increase in tree canopy cover on the site in comparison to the existing situation.
- 8.11.10 The submission documents state that proposed below ground utilities and drainage infrastructure have been designed to avoid Root Protection Areas (RPAs) in order to protect the integrity of retained trees. Detailed protection measures have been provided in the submitted Arboricultural Method Statement. A condition is recommended ensuring the methods outlined in the submitted documents are adhered to on site, to ensure trees will be appropriately protected at all stages of development.
- 8.11.11 On the basis of an Arboricultural Method Statement being submitted the Proposal is considered to be acceptable in relation to trees and in line with relevant policies including Enfield Policy DMD80 and Policy G7 of the London Plan (Intend to Publish). It is also noted that substantial amounts of landscaping is proposed as part of the development. As such there will be an improvement resulting from this and from the gain in trees in terms of visual amenity and biodiversity benefits.
- 8.11.12 An area of dense trees and shrubs designated as Metropolitan Open Land (MOL), lies to the north of the existing western car park on Site A. The London Plan affords MOL the same status and protection as Green Belt and in alignment with this approach, Enfield Policies do not permit inappropriate development in MOL.
- 8.11.13 No built development is proposed within this area, with no buildings proposed in this area. There will, however be proposals to improve access to the area of MOL via an informal footpath with incidental play opportunity for children aged 5+. An existing fenceline between the car park and area of open space is proposed to be removed.
- 8.11.14 As Paragraph 141 of the NPPF requires LPAs to plan positively to enhance the beneficial use of Green Belt (such as looking for opportunities to provide access to and recreation within them), this is considered acceptable in this instance.
- 8.11.15 Officers consider the proposals are in accordance with Enfield adopted DMD Policy DMD71 (Protection and Enhancement of Open Space) – which supports essential structures and facilities that would support the enjoyment of and maintain the openness of the open space. DMD 71 states that these will be acceptable provided that the site, siting, location, design and materials would be sympathetic and proportionate to the operational requirements of the open space that it supports.

8.12 Water Resources, Flood Risk and Drainage

- 8.12.1 The Flood and Water Management Act 2010 (FWMA) was introduced to address the increasing risk of flooding and water scarcity, which are predicted to increase with climate change. The act sets out requirements for the management of risks in connection with flooding and coastal

erosion. Whilst the Environment Agency is responsible for developing a new national flood and coastal risk management strategy Lead Local Flood Authorities (LLFA), such as the London Borough of Enfield will have overall responsibility for development of a Local Flood Risk Management Strategy for their area and for co-ordinating relevant bodies to manage local flood risks.

- 8.12.2 London Plan (Intend to Publish) Policy SI 12 requires developments to ensure flood risk is minimised and mitigated and that residual risk is addressed. As the site is located within Flood Zone 1 the sequential test does not apply to the development.
- 8.12.3 The Proposed Development would result in a change of use to a 'More Vulnerable' use class (Flood Risk Table 2). This is considered acceptable in Flood Zone 1, without the requirement for the Exception Test to be passed, in accordance with Flood Risk Table 3 (vulnerability and flood zone 'compatibility') set out in the Planning Practice Guidance.
- 8.12.4 Meanwhile London Plan Policy 5.13 and London Plan (Intend to Publish) Policy SI13 relate to sustainable drainage whereby the preference is to reduce surface water discharge from the site to greenfield run off rates.
- 8.12.5 The Council's draft Local Plan sets out the Borough's ambitions in relation to growth until 2036. Policy SUS5: Surface Water Management notes the following overarching aims in relation to drainage and flood risk: All major developments to implement Sustainable Drainage Systems (SuDS) to enable a reduction in peak run-off to greenfield run-off rates for the 1 in 1 year and the 1 in 100-year event (plus climate change allowance); All major developments to provide a sustainable drainage strategy that demonstrates how SuDS will be integrated to reduce peak flow volumes and rates in line with the requirements of this draft policy approach; All other developments to maximize attenuation levels and achieve greenfield runoff rates where possible or increase the site's impermeable area; Development to be designed to minimise flood risk and include surface water drainage measures to be designed and implemented where possible to help deliver other Local Plan policies such as those on biodiversity, amenity and recreation, water efficiency and quality, and safe environments for pedestrian and cyclists; All new outdoor car parking areas and other hard standing surfaces be designed to be rainwater permeable with no run-off being directed into the sewer system, unless there are practical reasons for not doing so; Living roofs to be incorporated into new development, to help contribute to reducing surface water run-off; and Where installed, SuDS measures be retained and maintained for the lifetime of the development and details of their planned maintenance provided to the Council.
- 8.12.6 Supporting these principles is Development Management Document Policy DMD 61 which requires a drainage strategy to be produced that demonstrates the use of SuDS in line with the London Plan discharge hierarchy. The policy requires the use of SuDS to be maximised with consideration given to their suitability, achieving greenfield run off rates, the SuDS management train and to maximise the opportunity for improved water quality, biodiversity, local amenity and recreation value.
- 8.12.7 As well as the above policy the Council sets out further advice in its Flood Risk guidance which outline strategies for the mitigation of flood risk, management of surface water including the implementation of Sustainable Urban Drainage Systems (SuDS) on new developments, with allowances for the impact of climate change. The guidance recommends that the

relevant documents are i) Preliminary Flood Risk Assessment, ii) Surface Water Management Plan, iii) Strategic Flood Risk Assessment (Levels 1 & 2), iv) Local Flood Risk Management Strategy, and v) Sustainable Drainage Design and Evaluation Guide.

- 8.12.8 Lastly the CIRIA C753 'The SuDS Manual' 2015 includes up-to-date research, industry practice and guidance in relation to delivering appropriate SuDS interventions including information on measures to deliver cost-effective multiple benefits relating to technical design, construction and maintenance of SuDS systems.
- 8.12.9 Assessment: The proposed development will beneficially remove a substantial area of impermeable car park hardstanding, which will be Sustainable Drainage measures (SuDS) including green roofs (50%), rain gardens, swales and permeable paving. This is strongly supported by Officers and is considered to be a scheme benefit. The Applicant has submitted a Landscape Strategy in support of the application, which sets out details of the proposed drainage strategy.
- 8.12.10 Officers recommend further details be secured by way of planning condition, to include details of the potential to further consider any additional SuDS measures – such as the feasibility of a gravity sewer connection and the feasibility of rainwater harvesting on site. Whilst surface water pumps are proposed as a preferred discharge option, further information should be submitted, by condition, to demonstrate a gravity sewer connection has been sufficiently explored. Officers also recommend details be submitted to provide further rationale for the proposed strategy.
- 8.12.11 In respect of flood risk, the Applicant has submitted a Flood Risk Assessment which assessed possible sources of flood risk in respect of London Plan Policy 5.12 and LPItP Policy SI12. The assessment concludes that the site is at a low risk of flooding from all sources. A Surface Water Drainage Strategy and Foul Drainage Strategy have also been submitted alongside a Drainage Strategy.
- 8.12.12 Subject to planning conditions, the proposal is considered to be in accordance with Policy CP28 of the Core Strategy, DMD Policy 61, and Policies 5.12 & 5.13 of the London Plan and the NPPF. Officers have recommended conditions in respect of submission of further details on: Sustainable Drainage Strategy to include details of the sustainable management of waste; minimisation of flood risk; minimisation of discharge of surface water outside of the curtilage of the property; and to ensure that the drainage system will remain functional throughout the lifetime of the development.

8.13 Environmental Considerations / Climate Change

- 8.13.1 The NPPF maintains the presumption in favour of sustainable development, including environmental sustainability, and requires planning to support the transition to a low carbon future in a changing climate (Para.148). This entails assisting in reducing greenhouse gas emissions, minimising vulnerability, encouraging the reuse of existing resources and supporting renewable and low carbon energy infrastructure.
- 8.13.2 Meanwhile London Plan (Intend to Publish) Policy G1 acknowledges the importance of London's network of green features in the built environment and advocates for them to be protected and enhanced. The Policy notes that green infrastructure 'should be planned, designed and managed in an

integrated way to achieve multiple benefits'. Also of relevance is Policy G6 which requires developments to manage impacts on biodiversity and secure a net biodiversity gain.

- 8.13.3 Paragraph 150 of the NPPF requires new developments to 'be planned for in ways that avoid increased vulnerability to the range of impacts from climate change... and help to reduce greenhouse gas emissions, such as through its location, orientation and design'. The Council's Cabinet declared a state of climate emergency in July 2019 and committed to making the authority carbon neutral by 2030 or sooner. The key themes of the Sustainable Enfield Action Plan relate to energy, regeneration, economy, environment, waste and health. Meanwhile the London Plan (Intend to Publish) and Enfield Issues and Options Plan each make reference to the need for development to limit its impact on climate change, whilst adapting to the consequences of environmental changes. Furthermore, the London Plan sets out its intention to lead the way in tackling climate change by moving towards a zero-carbon city by 2050.

Energy and Sustainability

- 8.13.4 Currently, all residential schemes are required to achieve net zero carbon with at least an on-site 35% reduction in carbon emissions beyond Part L of 2013 Building Regulations. The same target will be applied to nondomestic developments when the new London Plan is adopted.
- 8.13.5 The NPPF (Para.153) requires new developments to comply with local requirements for decentralised energy supply and minimise energy consumption by taking account of landform, layout, building orientation, massing and landscaping.
- 8.13.6 Policy SI2 of the London Plan (Intend to Publish) sets a target for all development to achieve net zero carbon, by reducing CO₂ emissions by a minimum of 35% on-site, of which at least 10% should be achieved through energy efficiency measures for residential development (or 15% for commercial development). Meanwhile Policy DMD55 and paragraph 9.2.3 of the London Plan (Intend to Publish) advocates that all available roof space should be used for solar photovoltaics.
- 8.13.7 Assessment: An Energy Statement and a Sustainability Statement have been prepared by Aecom which provide an overview of the energy and sustainability strategies for the Proposed Development. The documents demonstrate how the proposal has sought to meet London Plan requirements and relevant Council policies.
- 8.13.8 In order to reduce the energy consumption of the development and to assist in achieving a compliant scheme, the Energy Statement states that measures pertaining to energy efficiency; overheating and cooling; decentralised energy; and renewable energy need to be incorporated into the detailed design.
- 8.13.9 The Proposed Development has sought to follow the London Plan (Regulated Carbon Emissions Reduction Priority) hierarchy. To that end passive efficiency measures have been introduced in the proposals through a high standard of fabric (including highly insulated walls, floor and roofs, efficient glazing and high levels of air tightness) and energy efficiency specified to reduce energy demand, CO₂ emissions as well as reduce running costs for future occupiers.

- 8.13.10 The Carbon Emission Reduction Model demonstrates that target emission reduction from the baseline (Part L 2013) can be exceeded through the proposed energy efficiency measures and can achieve the 10% / 15% carbon reduction targets as required by London Plan (Intend to Publish) Policy SI2.
- 8.13.11 The applicants are currently liaising with Energetik with the intention of connecting to the District Energy Network (DEN). At the time of writing this report correspondence between the parties is ongoing and an agreement to connect to the DEN is being actively pursued. The Arnos Grove Heat Network is currently served by an energy centre that generates heat using Gas Combined Heat and Power and boilers. The network connection is proposed in accordance with the requirements of Policy S13 of the London Plan (Intend to Publish) and Council policy DMD52 which require major development to connect to existing heat networks unless there are feasibility or viability reasons not to. The expected carbon emission reduction from connection to the DEN is 26% which is considered a substantial efficiency.
- 8.13.12 It is recommended that s106 planning obligations be secured in line with adopted Enfield DMD Policy 52 and the requirements of Enfield's adopted Decentralised Energy Network Technical Specification SPD. The Applicant is actively considering and pursuing connection to the planned Energetik District Heat Network (DHN). An alternative fall-back strategy, based on Air Source Heat Pumps (ASHP), is also being considered. A carbon off-set contribution is recommended to be secured by way of s106 of between £139,847 - £194,731.
- 8.13.13 The submitted Energy Strategy sets out that CO2 emission reduction would also be achieved through the installation of photovoltaic panels (PV) on 130 sq.m of roof area across the development. The submitted information details that 69% of the flat roof area across the Proposed Development will not be suitable for PV installation due to the need for setbacks, plant, machinery and other roof equipment, and shaded areas. Notwithstanding the combined energy efficiency measures are expected to achieve a reduction of 42% in regulated CO2 emissions which exceeds the minimum London Plan (Intend to Publish) target of 35% and meets Enfield policy requirements.
- 8.13.14 During the course of the application (pre and post-submission) the applicant has continued to work with the GLA's Energy Team to respond to GLA comments on the proposal in Energy terms. The proposal is considered acceptable in terms of energy and sustainability.

Ecology and Biodiversity

- 8.13.15 The NPPF (Para.170) requires planning decisions to protect and enhance sites of biodiversity value, providing net gains for biodiversity and establishing resilient ecological networks. Meanwhile London Plan (Intend to Publish) Policy GG2 requires development to 'protect and enhance... designated nature conservation sites and local spaces and promote the creation of new infrastructure and urban greening, including aiming to secure net biodiversity gains where possible'. This guidance is also evident in London Plan (Intend to Publish) Policy G6 which requires developments to manage impacts on biodiversity and secure a net biodiversity gain. Enfield Core Policy 36 requires development to protect, enhance, restore or add to existing biodiversity including green spaces and corridors, whilst draft Local Plan policy GI4 refers to the need to promote qualitative

enhancement of biodiversity sites and networks and encourage the greening of the Borough.

- 8.13.16 Within a more strategic context the Environment Bill, published by the UK Government in October 2019 includes proposals to make biodiversity net gain (BNG) a mandatory requirement within the planning system in England. Should the Environment Bill be passed in a form similar to that introduced in October 2019, developments such as this will be required to achieve a 10% gain in biodiversity units relative to the development site's baseline biodiversity.
- 8.13.17 The Site is adjacent to a Site of Borough Importance for Nature Conservation (SINC), within which sits a Wildlife Corridor along the Piccadilly Railway Line tracks. Currently the existing site is considered of low biodiversity and ecological value, with the exception of vegetation to the periphery of the site, and an area of woodland to the north of Site A.
- 8.13.18 The Proposed Development will not result in the disturbance of any existing habitats. In addition, the scheme has been designed with the protection and enhancement of the habitat and biodiversity within and adjacent to the site, in mind. To that end planting has been selected to maximise biodiversity value and features native or near native species which will help to reinforce the established nature of the adjoining SINC.
- 8.13.19 When measured against Natural England's Biodiversity Metric 2.0 Calculator, it was found the proposed development would result in a 30.80% biodiversity net gain which exceeds requirements of the forthcoming Bill by some margin. Furthermore, this demonstrates compliance with the requirements of the NPPF (Para 170) and London Plan (Intend to Publish Policy G6) in relation to development delivering biodiversity net-gain. The proposal targets an Urban Greening Factor score from of 0.419.

Climate Change

- 8.13.20 Recent data from the Met Office indicates key climate projections for the UK are summers becoming hotter and drier; winters becoming milder and wetter; soils on average becoming drier; snowfall and the number of very cold days decreasing; rising sea levels; and storms, heavy and extreme rainfall, and extreme winds becoming more frequent.
- 8.13.21 As mentioned above Paragraph 150 of the NPPF requires new developments to 'be planned for in ways that avoid increased vulnerability to the range of impacts from climate change... and help to reduce greenhouse gas emissions, such as through its location, orientation and design'. Also as mentioned above, in July 2019 a state of climate emergency was declared by the Council's Cabinet which committed to making the authority carbon neutral by 2030 or sooner. The key themes of the Sustainable Enfield Action Plan focus on energy, regeneration, economy, environment, waste and health.
- 8.13.22 Meanwhile, the London Plan (Intend to Publish) and Enfield Issues and Options Plan both make reference to the need for development to limit its impact on climate change while adapting to the consequences of environmental changes. The London Plan's ambitions look to lead the way in robustly addressing climate change by moving towards a zero-carbon city by 2050.

- 8.13.23 Assessment: The Proposed Development incorporates a number of measures and philosophies which align with a larger and wider drive to address climate change. These include as follows: removing the opportunity for and subsequently reducing the reliance on private motor vehicles, and as such easing traffic and congestion; and demonstrating via a high score against 'Healthy Street' indicators that the Development would provide an overall improvement in the local environment – this will have the knock-on effect of encouraging and assisting Londoners to use cars less and walk, cycle and use public transport more.
- 8.13.24 The above measures would as a result reduce the use of cars or polluting vehicles and emission of greenhouse gases (i.e. carbon dioxide, methane and nitrous oxides) which contribute to climate change.
- 8.13.25 In addition, by contributing to local green infrastructure through new planting, green roofs and a net gain in tree coverage which all support biodiversity and reduce the urban heat island effect. These green networks will connect to existing ecological corridors and open spaces, particularly along the Piccadilly Line railway tracks.
- 8.13.26 As well as these measures the layout of the Development includes passive design strategies to reduce energy consumption and proposes the use of efficient processes and appliances, energy efficient fabric, insulation and glazing, as well as efficient lights, hot water storage and mechanical ventilation with heat recovery. A connection to the District Energy Network and the addition of 130 sq.m of PV roof panels will further reduce energy consumption and raise the eco credentials of the Development and wider Site.

Conclusion of Environmental Considerations

- 8.13.27 The Proposed Development is considered to meet national, London and local policy requirements which seek to ensure developments protect and enhance the natural environment. As well as the measures outlined above, as noted elsewhere in this report the development will be car free which would mark a significant milestone towards addressing climate change by removing the opportunity for and subsequently reducing the reliance on private motor vehicles.
- 8.13.28 The proposal supports London and local action plans to mitigate climate change, minimising its impacts and ensuring development is resilient to its effects. It employs strategies such as promoting sustainable travel, removing cars from the road, proposing efficient systems and energy consumption reduction measures as well as enhancing and expanding the green infrastructure network.
- 8.13.29 Whilst the Development seeks to account for the likely future extreme weather events such as higher temperatures and more rainfall, the Council are seeking further measures in the way of drainage and SuDS intervention as outlined earlier in the report. With the above taken into consideration, the proposal is considered to be acceptable in terms of environmental considerations and in line with relevant policies including DMD51, 52, 53, 54, 56, 78, 79; CS Policies 20, 32 & 36; existing London Plan Policies 5.1, 5.2, 5.5, 5.6, 5.7, 5.9, 5.10, 5.11, 5.12 & 5.13; and London Plan (Intend to Publish) Policies G6 & S12.

8.14 Waste Storage

8.14.1 The NPPF refers to the importance of waste management and resource efficiency as an environmental objective. Policy S17 of the London Plan (Intend to Publish) encourages waste minimisation and waste prevention through the reuse of materials and using fewer resources whilst noting that applications referable to the Mayor should seek to promote circular economy outcomes and aim to achieve net zero-waste. Enfield Core Policy 22 (Delivering Sustainable Waste Management) sets out that in all new developments, the Local Planning Authority will seek to encourage the inclusion of re-used and recycled materials and encourage on-site re-use and recycling of construction, demolition and excavation waste.
Construction Waste

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

Operational Waste

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

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

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

8.14.6 **LUL Bins:** Arnos Grove station is the terminus for some trains. Six no. Euro bins are currently located on site B and are required to be reprovided. Bins are located to the western side of B01 and accessed via a service entrance from the public realm to the south. In order to ensure that operational waste requirements, including access arrangements for waste vehicles and base calculations of bin numbers for waste storage and dedicated recycling bins required for the dwellings are met, a planning condition requiring a Waste Strategy to be submitted to the Council for approval is recommended.

8.14.7 **Conclusion:** On the basis that the Development will seek to minimise waste generation as much as is feasible during both the construction and operational phase and use sustainable construction and waste disposal methods as much as possible in accordance with the Development Plan, it is considered that no significant adverse effects in respect to waste management would arise as a result of the Proposal, and the Proposal would be in line with relevant Policies including DMD 49 & 57; CS 22; existing London Plan Policy 5.18; and London Plan (Intend to Publish) Policy S17. This is also subject to a planning condition requiring a Waste

Strategy which should include details of the frequency of collections, to be agreed by the LPA prior to the development becoming operational.

8.15 Contaminated Land

- 8.15.1 The current carpark setting matches the latest map of the area with approximately 90% of the Site covered with asphalt, with the remaining 10% occupied by grass and mature trees. The submitted Contamination Report identifies no significant potential sources of contamination.
- 8.15.2 The Site remained undeveloped until 1932 when Arnos Grove Station was built. Historical OS map from 1936 identifies the construction of Arnos Grove Station and railway lines passing between the two parts of the Site (i.e. today western and eastern carparks). The carpark development is shown in 1950-1951 with it occupying the present territory from 1971.
- 8.15.3 The geology of the area just outside the north site comprises River Terrace Deposits overlying London Clay Formation. Lambeth Group, Thanet Sands and White Chalk are expected to be present below London Clay and there is also likely to be Made Ground. The nearest watercourse is Pymme's Brook situated 220 m from the site.
- 8.15.4 The site is directly underlain by a significant thickness of low permeability London Clay (construction is expected to terminate within this stratum) which is classified by the Environment Agency as Unproductive Strata. Given the absence of a classified aquifer directly beneath the site, groundwater is considered to be a low sensitivity receptor. Mapping produced by the EA and supplied with the Envirocheck report shows that the site does not lie within a Source Protection Zone and therefore the risk to groundwater as a resource from potential contaminating activities is reduced.
- 8.15.5 Conclusion of Contaminated Land: Subject to appropriate condition/s being attached requiring both compliance with submitted proposed measures and further details to be submitted in the way of a Remediation Strategy and a Verification Report, the Development is considered acceptable in terms of contaminated land and in line with relevant guidance including Paragraph 170 of the NPPF.

8.16 Air Quality / Pollution

- 8.16.1 London Plan Policies 3.2, 5.3 and 7.14 and London Plan Policy (Intend to Publish) S11 set out requirements relating to improving air quality. These Policies require Development Proposals to be at least Air Quality Neutral and use design solutions to prevent or minimise increased exposure to existing air pollution. Furthermore, the Policies require developments to consider how they will reduce the detrimental impact to air quality during construction and seek to reduce emissions from the demolition and construction of buildings.
- 8.16.2 Meanwhile the NPPF (Para.103) recognises that development proposals which directly address transport issues and promote sustainable means of travel can have a direct positive benefit on air quality and public health by reducing congestion and emissions.
- 8.16.3 Lastly Enfield Policy DMD 65 requires development to have no adverse impact on air quality and states an ambition that improvements should be sought, where possible.

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

8.17 Health

- 8.17.1 The NCAAP (2014) states that NC Policy 5 'Provision of Modern Healthcare Facilities' states that development of 10 residential units or more will be expected to contribute towards the provision of health facilities within the NCAAP area, and financial contributions will be calculated using the NHS Healthy Urban Development Unit Model.
- 8.17.2 Based on the 2011 Census, the ward population for Southgate Green within the London Borough of Enfield Authority, was recorded as 13,787 with the number of households 5,154. Within that ward population the economically active (age 16-64 in full time work, part time work, self-employed, full time students or unemployed) is 73.4%, which is slightly lower than the England and Wales average of 76.8%.
- 8.17.3 The Proposed Development will result in the provision of housing, additional local spending by residents of the new development, and the provision of public and private amenity space and open space.
- 8.17.4 As the Development will provide good quality housing, a small level of employment opportunities by way of the ground floor commercial unit in building A01 and access to amenity areas, potential positive effects on health are anticipated in regard to access to open space, crime reduction and community safety. Taking the above into consideration, overall it is considered that some positive environmental effects on socio-economics would arise as a result of the development. Furthermore, it is not considered there would be any significant effects on health occurring as a result of the development. Officers have secured a financial contribution of £70,957 to contribute towards the provision of health facilities within the area.

8.18 Education

- 8.18.1 Policy S3 of the London Plan (Intend to Publish) seeks to ensure there is a sufficient supply of good quality education and childcare facilities to meet demand and notes that needs should be assessed locally and sub-regionally.
- 8.18.2 Meanwhile Enfield Local Plan Core Policy 8 sets out that the Council will contribute to improving the health, lives and prospects of children and young people by supporting and encouraging provision of appropriate public and private sector pre-school, school and community learning facilities to meet projected demand across the Borough.
- 8.18.3 The Council's Section 106 Supplementary Planning Document (SPD) sets out that LBE will seek financial contributions for education at a rate of £2,535 per dwelling regardless of unit size. However, in the context of education contributions, the amount of mitigation requested should not exceed the cost of meeting the likely education demand from the development; and should be necessary to do so. If there is existing surplus capacity in education facilities that could meet this need without additional capital costs being required, education obligations are not justified in terms of tests set by Regulation 122.
- 8.18.4 Child yield: The total population and number of children expected to live in the Proposed Development has been calculated using the GLA Population Yield Calculator (v3.2 October 2019). For the purposes of the application the applicants have manually adjusted the age brackets to align with primary and secondary educational years.
- 8.18.5 For the Proposed Development a PTAL rating of 5-6 is assumed (the Site is located within PTAL 6a) and classified as 'London' (normally this location would be considered to be 'Outer London' however due to the small sample size of outer London developments that are in PTAL 5-6, this option is excluded from the model).
- 8.18.6 The projected gross child yield is set out in the Table below.

Projected child yield arising from the Development

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

* Figures do not sum due to rounding.

- 8.18.7 The submitted information indicates the Development Child Yield will be 9 primary school age children, 2 secondary school age children, and 4 further/sixth form age children.
- 8.18.8 Using the GLA Population Yield Calculator (with the applicant adjustments as mentioned above), the estimated population number generated by the Proposed Development is 305. Of this number, it is expected that there will be 26 children under 16 years of age made up of nine children of primary school age (4-10), two children of secondary school age (11-15) and 14 children under the age 4 of which a proportion may need local childcare.

- 8.18.9 It is noted that these projections are gross population yields and that some families may already live in the area and may already have a place at a local school. Additionally, not all children under 4 would be expected to need a place in an early years setting, and it would also be expected that most children who do, will take a part-time place. Based on the assumption that of those places that are part time, only part of the week or part of each day which will be utilised, it is assumed that one physical place in an early years setting can provide a part time place for more than one child.
- 8.18.10 Primary School: Officers have undertaken a detailed assessment of the potential child population, primary and secondary school surplus, latest forecasting information on school places in the context of Regulation 122 (Community Infrastructure Levy Regulations) tests. Regulation 122 sets out limitations on the use of planning obligations with which the planning authority must comply. It states: (1) This regulation applies where a relevant determination is made which results in planning permission being granted for development; (2) A planning obligation may only constitute a reason for granting planning permission for the development if the obligation is: necessary to make the development acceptable in planning terms; directly related to the development; and fairly and reasonably related in scale and kind to the development.
- 8.18.11 The scheme is estimated to house an estimated 9 primary school age children. There is evidence, in respect of this specific site and the appropriate catchment, of sufficient primary places (the current combined surplus capacity at the primary schools within 1km of the Site is approximately 10%). Whilst it is standard practice to maintain a surplus capacity of 5% in schools to accommodate mid-year admissions and facilitate parental choice, an estimated 10% surplus indicates that there is likely to be capacity within local primary schools
- 8.18.12 In the context of education contributions, this means that the amount of mitigation requested should not exceed the cost of meeting the likely education demand from the development; and should be necessary to do so. If there is existing surplus capacity in education facilities that could meet this need without additional capital costs being required, this means that education obligations would not be justified under the terms of Regulation 122.
- 8.18.13 The Infrastructure Planning team has confirmed that the evidence presented, including the modest child population likely, that it would not be proportionate, reasonable or necessary to request an education contribution in this specific case, on this specific site.
- 8.18.14 Secondary School: With regards to secondary school places it is noted that when recent secondary school projections were published there was some level of uncertainty about the opening time of the Wren Academy at Chase Farm. However, as the school is now open, it there is no further deficit in school places, as evidenced and assessed at this time. As such, it is expected that any secondary demand will be met by this school and the opening of the One Degree Academy (Secondary part) which is currently planned for September 2023.
- 8.18.15 On the basis of the above information, and in the context of Regulation 122 the proposal is considered to align with relevant policy guidance including Enfield Local Plan Core Policy 8; and Policy S3 of the London Plan (ItP) and would not be considered give rise to an unmanageable or

unacceptable scenario in terms of education provision to existing or future residents.

8.19 Fire Safety

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

8.20 Equality Duty and Human Rights

- 8.20.1 Due to the nature of objections received it has been decided to include an expanded section on equalities in order to demonstrate that there can be no doubt that the local planning authority has discharged its duty under the Equality Act 2010 in consideration of this application.
- 8.20.2 In line with the Public Sector Equality Duty the council must have due regard to the need to eliminate discrimination and advance equality of opportunity, as set out in section 149 of the Equality Act 2010. Section 149 of the Act requires public authorities to have due regard to a number of equality considerations when exercising their functions including decision making on planning applications. These considerations include: Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act; Advance equality of opportunity between persons who share a relevant protected characteristic (explained in detail below) and persons who do not share it; Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
- 8.20.3 The main objective of the duty has been to ensure public policies and programmes are implemented fairly, in particular with regard to their impact on the protected characteristics identified above. In making this recommendation, due regard has been given to the Public Sector Equality Duty and the relevant protected characteristics (age, disability, gender reassignment, marriage / civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation).
- 8.20.4 In line with the Human Rights Act 1998, it is unlawful for a public authority to act in a way which is incompatible with a Convention right, as per the European Convention on Human Rights. The human rights impact have been considered, with particular reference to Article 1 of the First Protocol

(Protection of property), Article 8 (Right to respect for private and family life) and Article 14 (Prohibition of discrimination) of the Convention. The Human Rights Act 1998 does not impair the right of the state to make decisions and enforce laws as deemed necessary in the public interest.

- 8.20.5 Concerns that the proposal would disproportionately and detrimentally impact on age, disability, pregnancy and maternity and sex have been fully considered. This includes consideration of objections received stating that approval of the application would result in Enfield Council acting to worsen, not improve, the life chances of Enfield residents and others, including those within statutorily protected characteristic groups (PCG). The objections reference the following protected characteristic groups: age; disability; pregnancy and maternity; and sex.
- 8.20.6 Several objections state that Enfield Council and the Applicant, has not had due regard under section 149 of the Equality Act (2010) and that key considerations under the Public Service Equality Duty (PSED) have not been addressed. Some references state that the lack of an Equality Impact Assessment is evidence that Enfield Council has not had due regard to Section 149 of the Equality Act (2010). A representation received references Enfield Council's (corporate) commitment to 'carry out an Equality Impact Assessment on any housebuilding decision that may have a significant impact on staff and residents' and questioning why an EQIA has not been completed for the proposed scheme.
- 8.20.7 There are also references across several objections to the lack of drop-off and collecting areas prejudicing disabled, elderly and female residents. Objections have been received stating there may be a particular impact for older people who do not qualify for blue badges, including people with mobility impairments who do not possess a blue badge (but who might, for example, make use of the TaxiCard scheme).
- 8.20.8 When determining the planning application, the Council has considered the potential effects of the proposed development on those with protected characteristics as defined under the Equality Act 2010. In doing this, the Council has had due regard to equality considerations and attribute appropriate weight to such considerations. In providing the recommendation to Members that planning consent should be granted, officers have considered equalities impacts in the balance, alongside the benefits arising from the proposed development. The Council has also considered appropriate mitigation to minimise the potential effects of the proposed development on those with protected characteristics.
- 8.20.9 There are no statutory or regulatory requirements for the form or content of an equalities assessment. A growing body of recent practice has been to categorise equalities impacts into Disproportionate and Differential. Some effects of development will affect many users – residents, customers, visitors, employees – including many with protected characteristics. This is not necessarily an equalities issue, but it may become one when any adverse effect on those with protected characteristics is Disproportionate or Differential, as explained: Disproportionate: there may be a disproportionate equalities effect where people with a particular protected characteristic make up a greater proportion of those affected than in the wider population. Differential: there may be a differential equalities effect where people with a protected characteristic are affected differently to the general population as a result of vulnerabilities or restrictions they face because of that protected characteristic.

- 8.20.10 The scale and significance of such impacts cannot always be quantified, and it is common to address this through descriptive analysis of impacts and identifying whether such impacts are adverse or beneficial.
- 8.20.11 The key elements of the Proposed Development which have an impact that could result in an equalities effect include the displacement / removal of the existing use and the design and physical characteristics of the proposals subject to the planning application. Officers do not consider there would be a disproportionate equalities effect. Based on detailed consideration of representations, including objections received, and details submitted by the Applicant the loss of 297 no. public car parking spaces has potential to give rise to differential impacts, requiring mitigation.
- 8.20.12 A variety of differential effects on people with protected characteristics would occur as a result of the proposed development, depending on how the potential negative effects can be mitigated. While the scale and significance of these effects cannot be meaningfully quantified, the direction of the effects can be qualitatively considered (whether they are positive, negative or neutral). The table in the Appendix summarises potential equalities effects arising from the proposals, considering the nature of these effects and setting out the proposed mitigation to address these effects. Officers have considered the effects of the scheme on protected characteristic defined by the Equality Act 2010, the table summarises where the proposed loss of 297 no. public car parking spaces has potential to give rise to differential impacts, which require mitigation. The table explains the approach to securing proposed mitigation.
- 8.20.13 Officers consider that there are some people with barriers to travel due to age, impairments or other factors, who may have their journeys impacted more significantly. Impacts are assessed in the table, including consideration of potential differential impacts, benefits, consideration of alternatives and proposed mitigation. The biggest impacts are likely to be felt by those regularly travelling to and from the area, particularly those who travel by car, while the biggest benefits are likely to be felt by existing residents close to the proposal and future residents.
- 8.20.14 Strategic considerations and Enfield Council's role as Local Planning Authority: London Plan Policy 3.1 seeks to ensure that development proposals protect and enhance facilities and services that meet the need of particular groups and communities and resists their loss without adequate justification or re-provision. Policy GG1 of the LPItP seeks to support and promote the creation of an inclusive city where all Londoners, regardless of their age, disability, gender, gender identity, marital status, religion, sexual orientation, social class, or whether they are pregnant or have children can share in its prosperity, culture and community, minimising the barriers, challenges and inequalities.
- 8.20.15 One objection received stated that paragraph 110(b) of the National Planning Policy Framework (February 2019) (NPPF) has not been addressed. Officers have considered the entirety of NPPF paragraph 110 in considering the application. Paragraph 110 states that:
- 8.20.16 Applications for development should:
- a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitate access to high quality public transport, with layouts that

- maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;
- b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport;
 - c) create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;
 - d) allow for the efficient delivery of goods, and access by service and emergency vehicles; and
 - e) be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.
- 8.20.17 As Local Planning Authority, Enfield Council is assessing the proposed development in the context of the provisions of the development plan and other material considerations (Section 70 of the TCPA and Section 38 of the Planning and Compulsory Purchase Act) – assessing and determining a planning application. It is not creating a new policy or project but assessing the scheme against policies (adopted and emerging). Officers note that the draft ‘Faired Enfield – Equality, Diversity and Inclusion Policy’ document states that Equality Impact Assessments consider the impact that any prospective changes to policy or service delivery will have on different groups of residents or staff and require staff to plan mitigating action to ensure that no group is disadvantaged by the change.
- 8.20.18 These considerations include assessment against adopted Development Plan policies of the North Circular Area Action Plan (2014). As set out above, the principle of redevelopment of the site and therefore the potential loss of the surface car parking was established at NC Policy 17 (Arnos Grove Station – Site 7). The NCAAP (2014) was subject to an Equality Impact Assessment (EqIA) – which included consideration of NC Policy 17. The analysis concluded: *‘The potential for mixed use redevelopment of the Arnos Grove Station site would have an overall positive impact on all of the equality groups in the area. However, the potential reduction in car parking provision may result in a negative impact for some equality groups that are dependent of the car parking for commuter travel, travelling with children and those less mobile. Improvements to the Arnos Grove Station entrance will provide positive impact and improve accessibility for those with mobility impairments.*
- 8.20.19 Having undertaken the analysis described above, Officers agree the potential for differential effects in respect of age. Officers have also considered some potential for differential effects in respect of users who travel with children and those who are less mobile. Officers have carefully assessed the material submitted and proposed mitigation to ensure these issues are addressed.
- 8.20.20 Officers note that the courts are clear that the duty under Section 149 of the Equality Act 2010 is not a duty to prepare an Equality Impact Assessment, but to have due regard to the issues⁷. Submission of an Equality Impact Assessment is not listed as a validation requirement on Enfield’s Local Validation list. In this case, Enfield Council is not creating a new plan or policy or making a change to its own service delivery. Enfield Council is acting as planning authority, not, in this case as a scheme promoter / developer or housebuilder. Enfield Council does not own or manage the car park and it is not the Applicant. The Applicant is Connected Living London

⁷ Peters v Haringey [2018] EWHC 192 (Admin) Case No: CO/3713/2017

(Arnos Grove) Ltd. CLL have considered and assessed equalities impacts, including through preparation of an Equality Impact Assessment during the design and project development of the scheme.

- 8.20.21 Strategically, car-free developments and the reduction of private-car trips encourage pedestrian and cycle friendly environments and support sustainable and healthy travel choices, in line with the Mayor of London's Healthy Streets Strategy. Strategically, the Healthy Streets Strategy focusses on improving people's health and quality of life with better air quality, more active travel, green spaces and road safety improvements. London Plan (ItP) policies T1 – T6.5 have been considered by the Planning Inspectorate to be consistent as national policy and their successful implementation would strategically: 'reduce car journeys; reduce road traffic kilometres; reduce road congestion and rail crowding; improve bus speeds; and reduce each of the four key emissions affecting air quality and climate change (carbon dioxide CO₂, nitrogen oxide NO_x, and particulate matter PM_{2.5} and PM₁₀)'.
- 8.20.22 If the committee is minded to approve the application, it will have supported implementation of adopted and emerging development plan policies aimed at achieving a strategic target of 80% of trips to be made by foot, cycle or public transport. Acknowledgement and recognition of the benefits of removing the public car park – and alignment with (then) emerging Mayoral transport policy spans back to preparation and adoption of the NCAAP – in 2014.
- 8.20.23 The design and layout of the existing public car park currently presents obstacles which may not meet the needs of some users – which risks perpetuating an existing situation of potential unequal opportunity for disabled and older people, women and women during pregnancy, or those carrying infants, who may find the existing car park challenging. The existing design and layout of the public car park creates opportunities for anti-social behaviour, criminal activities, and does not create a sense of safety. Officers have weighed a 'do nothing' approach which would preserve the existing car park, with its current disbenefits against delivery of the proposed scheme including benefits outlined.
- 8.20.24 Parking allocation within the existing car park is random. A space is also not guaranteed within the car park. If it reaches capacity users would park on surrounding streets, an unknown distance from the station. By comparison public transport provides equitable access and unlike private car use, which requires upfront investment, public transport for older (eligible) passengers is free (Freedom Pass).
- 8.20.25 Officers have also considered the positive effects which evidence suggests would occur following completion. These include improvements to the public realm for pedestrians and cyclists and evidence indicating a likely reduction in traffic. Public realm changes will also help to improve safety and the feeling of safety in the area.
- 8.20.26 The proposals are an opportunity to improve a range of detrimental impacts arising from the existing car park, and its use. A 'do nothing' scenario would not address the design flaws of the existing car park or the unsatisfactory existing drop-off arrangements – on site, and more broadly.
- 8.20.27 Objections have been received stating that improvements to 'safety and the feeling of safety in an area' are not relevant in considering the equality impacts and effects of the proposals. Feeling unsafe and being unsafe in

an area can be a barrier to travel for protected groups such as Women, BAME and LGB Londoners. Officers consider these effects and impacts are relevant in the assessment of the scheme – and have given due regard and consideration to the potential effects of the proposed development on all those with protected characteristics as defined under the Equality Act 2010.

- 8.20.28 The proposal is assessed to comply with the objectives of London Plan Policy 3.1 and draft London Plan Policy GG1 with regard to delivering a strong and inclusive community at Arnos Grove. Officers have assessed that the scheme is strongly aligned with NPPF paragraph 110 (a) – giving priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use.
- 8.20.29 Officers have considered the needs of people with disabilities and reduced mobility in relation to all modes of transport NPPF paragraph 110 (b) – as outlined above. Officers have assessed that the scheme would support the creation of places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles and avoiding unnecessary street clutter in line with and allow for the efficient delivery of goods, and access by service and emergency vehicles in line with NPPF paragraph 110 (c) and (d) – and be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations NPPF paragraph 110 (e).
- 8.20.30 A descriptive analysis of equalities potential effects of proposed development is set out in the Appendix. The Equality Act 2010 places the Local Planning Authority under a legal duty to have due regard to the advancement of equality in the exercise of its powers, including planning powers. Officers are satisfied that the Officers assessment and submitted material has considered these issues. The provisions of the Human Rights Act 1998 have been taken into account in the processing of the application and the preparation of this report. Matters considered include: taxi drop-off; general drop-off; blue badge parking (public re-provision and residential provision); public cycle parking re-provision and enhancement; loss of public non-blue barge parking car spaces; public realm design; impacts on traffic; bus interchange; affordable housing; accessible and family housing; and inclusivity.
- 8.20.31 Members should also take account of the provisions of the Human Rights Act 1998 as they relate to the application, and the conflicting interests of the Applicants and any third party opposing the application in reaching their decision. Members must also be mindful of the Local Planning Authorities' legal duty under the Equality Act 2010. In particular Members must pay due regard to the need to eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act; advance equality of opportunity between persons who share a relevant protected characteristics and persons who do not share it; and foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

8.21 Community Infrastructure Levy

- 8.21.1 Both Enfield CIL and the Mayor of London CIL2 would be payable on this scheme to support the development of appropriate infrastructure. A formal determination of the CIL liability would be made when a Liability Notice is

issued should this application be approved. Based on the Mayor and Council's Charging Schedules, the total level of CIL is expected to be in the order of £1,765,181 (based on current details, certain scheme assumptions, indexation assumptions and inclusion of relief).

8.22 Conclusion

- 8.22.1 The proposed redevelopment of the car parks at Arnos Grove Underground Station has been developed in the context of the relevant local, London and national planning policy. The proposed Site is a brownfield site in a highly sustainable location at Arnos Grove Underground Station. As a previously developed site which is currently underutilised, the Proposed Development for housing is fully supported by policies for boosting the supply of homes (NPPF para 59, London Plan Intend to Adopt Policy GG2 and H1).
- 8.22.2 The Site has a PTAL rating of 4 (good) to 6a (excellent), being at Arnos Grove underground station which provides access to the Piccadilly Line, linking the site to most areas within the City and with a bus interchange at the front of the station. The well-connected Site aligns with Mayoral and emerging local ambitions of moving towards providing exemplary designed high density residential led developments in sustainable locations.
- 8.22.3 The delivery of 162 new homes will optimise the use of a sustainably located brownfield site and make an important contribution towards meeting both the Council's and the Mayor's annualised housing targets. The provision of 40% affordable housing (by habitable room) will meaningfully contribute towards local and strategic housing need and targets.
- 8.22.4 The Proposed Development is a design-led scheme which optimises development on the site, has been informed by the site's constraints and local character, and designed to respond positively to and minimise and mitigate impact on the Grade II* listed Underground Station. Whilst there is some level of impact resulting from the Development this is not considered sufficient to outweigh the public benefits of the scheme.
- 8.22.5 The car free development, and provision of a new public square, will vastly improve permeability throughout the site, in stark contrast to the existing situation. It will also result in a shift away from the private car and encourage active travel and the use of public transport in line with the Mayor's Transport Strategy for Healthy Streets. The proposed buildings and public realm will have a positive impact on the immediate locality and introduce a contemporary style of architecture to the area that also responds positively to and complements the existing vernacular.
- 8.22.6 Optimisation of development on the site has also considered the requirements for residential space standards, private external amenity, play space and creating mixed and inclusive communities through the provision of wheelchair accessible and adaptable units, public transport accessibility and movement, impact on residential amenity, townscape and character and the adequacy of existing social infrastructure.
- 8.22.7 The likely impact of the loss of 297 no. public car parking spaces (non-blue badge) and the merits of encouraging sustainable travel options have been fully assessed. This includes considering the impact and mitigation of potential dispersal / displacement based on data of: alternative options available to existing car park users (based on Officer analysis of objections received / postcodes provided and survey information submitted in support of the application) and the local proximity of underground and national rail

stations in this area of south-west Enfield (most homes are within walking distance (960m or c.1/2 mile) of at least one of 6 x underground or national rail stations).

- 8.22.8 Officers have concluded that in the context of the credible range of alternative sustainable and active travel options available to existing car park users (and within this area of South-West Enfield) there is no evidence that the loss of 297 no. public car parking spaces, together with the mitigations proposed, would result in all existing car park users continuing to choose to park around Arnos Grove station. A reduction in cars travelling to park at the site, because of the proposed development, would reduce air pollution and noise disturbance locally.
- 8.22.9 As a result of the above characteristics the proposal is considered to accord with the development plan, as a whole, and as such it benefits from the statutory presumption in favour of the development plan as set out in section 38(6) of the Planning and Compulsory Purchase Act 2004. This policy support for the proposal is further reinforced by its compliance with important other material planning considerations, such as the NPPF and the London Plan (Intend to Publish) to which, for reasons explained elsewhere in this report, significant weight has been attached. On the basis of the above, it is considered that, on balance, the Proposed Development would align with relevant local, regional and national policy and as such is recommended for approval.

Appendix 1: Site Location

Site A

0.68ha

180 x parking spaces
6 x blue badge



Site B

0.45ha

117 x spaces
10 x LuL spaces

+ 2 x taxi drop off



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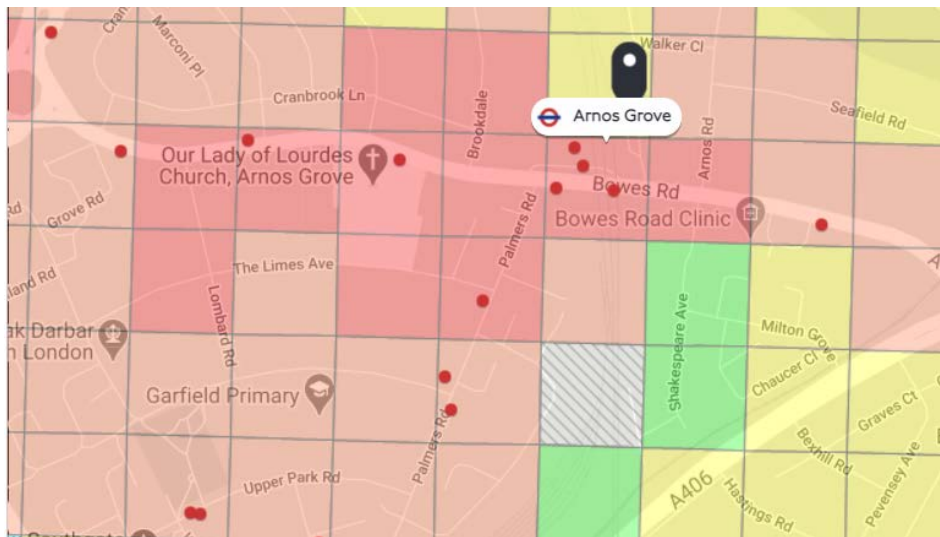
Scale 1:2500



Appendix 2: Site Location



Appendix 3: PTAL (2021 Forecast)



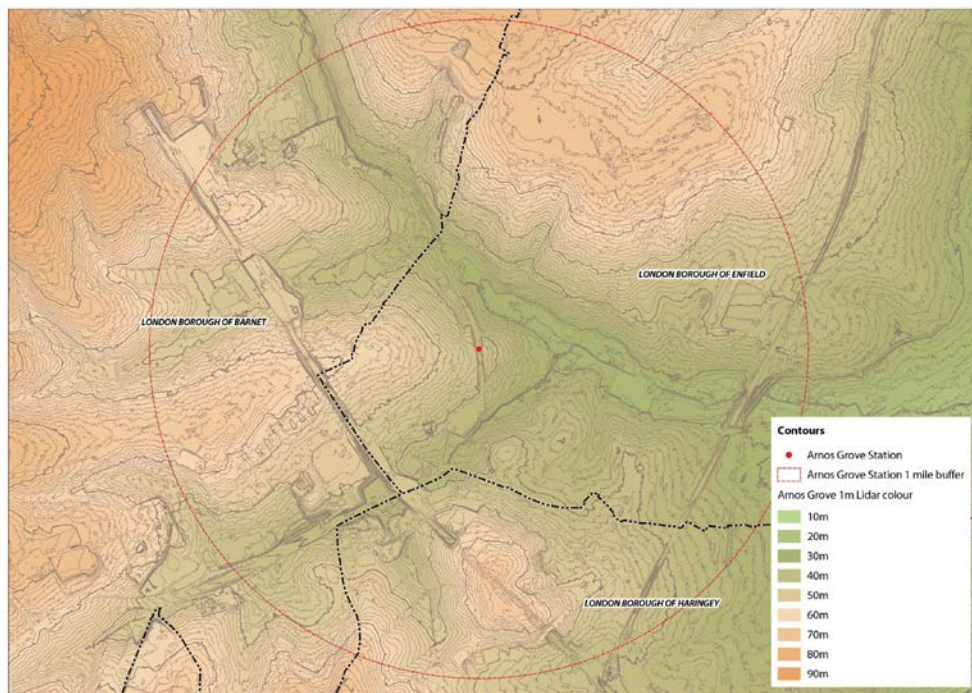
Map key - PTAL



Appendix 4: Listed Buildings and Local Heritage Assets



Appendix 5: Topography (star denotes Application Site)



Appendix 6: Station elements, including curtilage listed walls

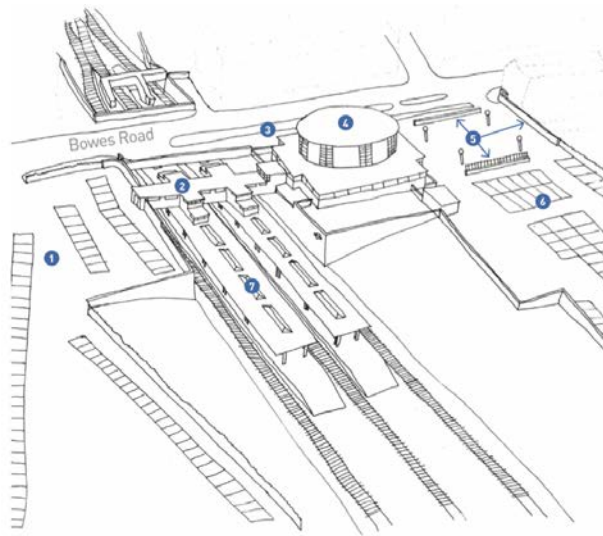


Fig. 3: Station diagram

- 1 Eastern car park (Site B)
- 2 Passengers' footbridge
- 3 Bus interchange
- 4 Ticket hall
- 5 Boundary walls of original station car park
- 6 Western car park (Site A)
- 7 Platforms

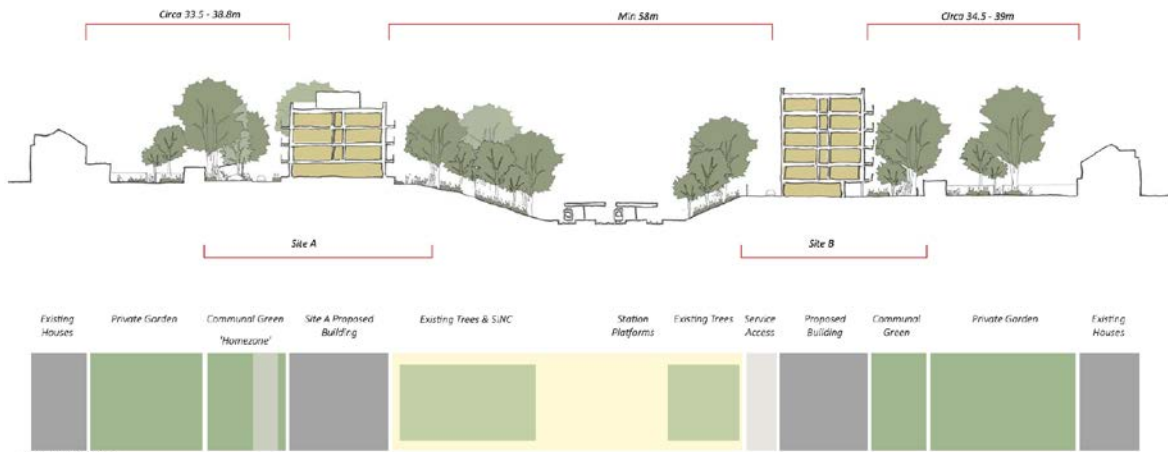
Appendix 7: Distances



Appendix 8: Neighbouring properties



Appendix 9: Design and Access Statement (extracts)



Site Cross Section Strategy
Site section (Block A01 – Block B02)



Block Plan



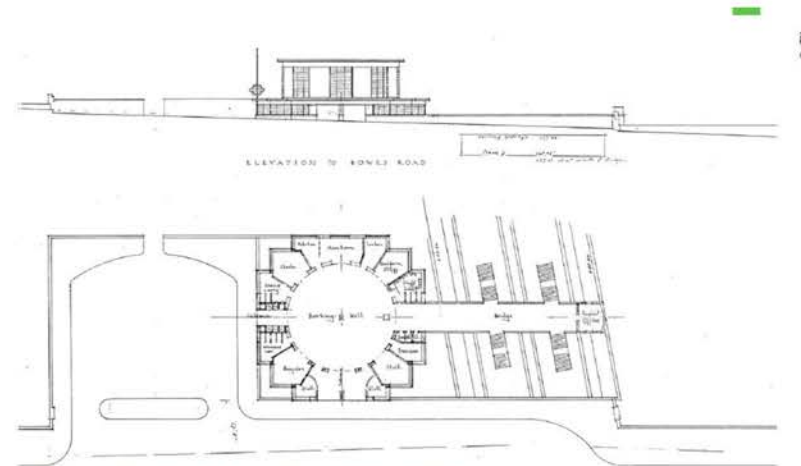
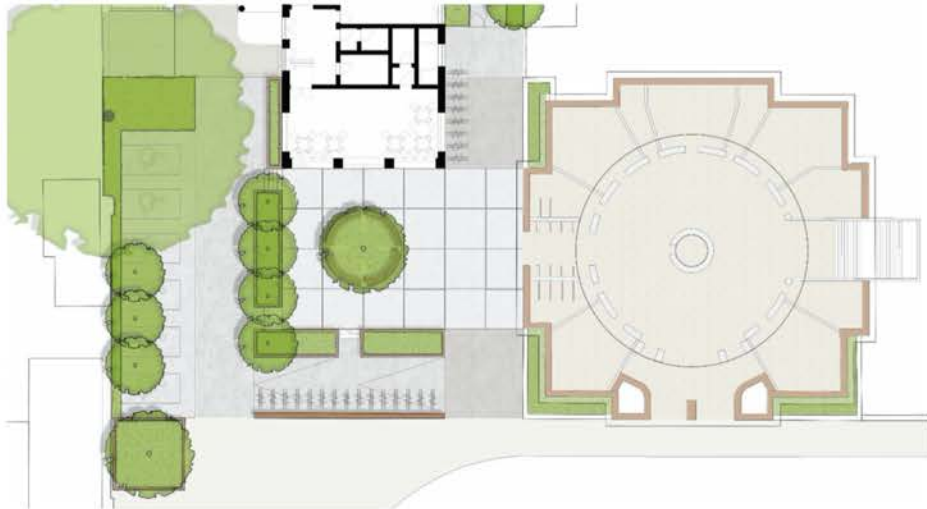
Massing



A01 (right / east) – looking towards A02



Proposed public square



Plan and Elevation of Arnos Grove Station, 1931

Proposed public square

A02 – looking towards A01

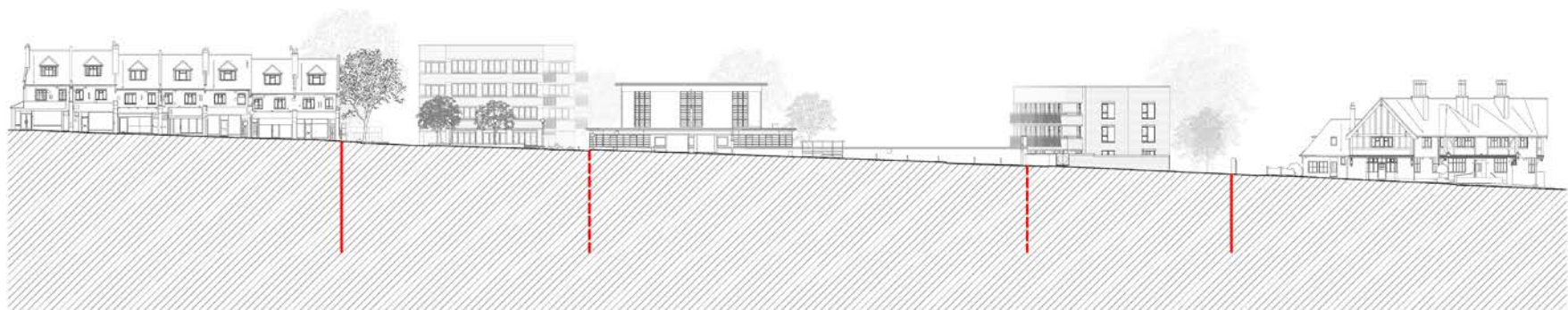




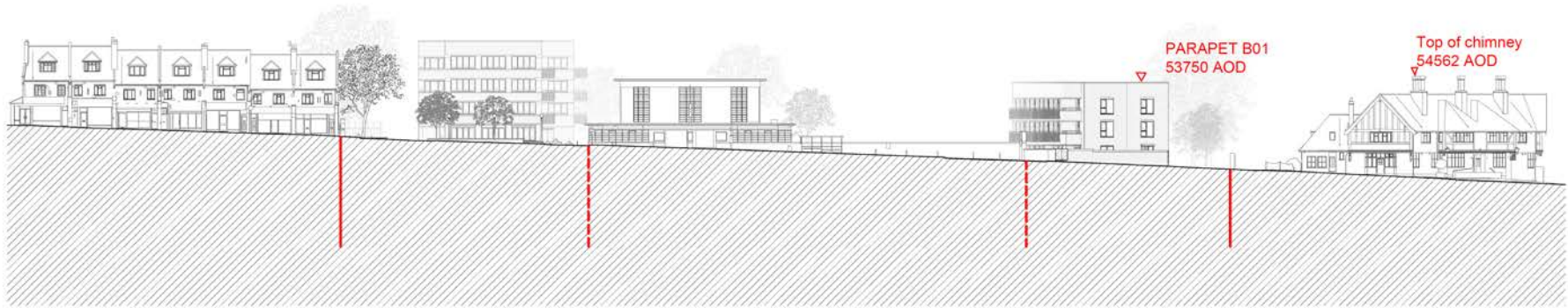
Home zone: B01 (left / west) – looking towards B02



Bowes Road



Proposed Site Elevation 1 - South



Proposed Site Elevation 1 - South



Building A02



B02 Entrance



B02 Entrance



Balcony detail

Proposed new planting plus trees proposed for retention



3.6.5 Entrance Strategy

Ground floor slab levels are set out at grade from the southern end of the blocks. The topography of the sites falls to the north. Cores to A01 & 02 are located centrally within the blocks. Blocks are entered from the southern end along the western facade via colonnaded walkway.

Block B01 is entered centrally from the eastern façade. At ground floor, a colonnaded structure provides a sheltered entrance and private porches to ground floor units. Upper floors are accessed via a shared deck.

Block B02 is served by two cores, both of which are entered from the southern end via a colonnaded under-croft.



A01 Entrance Colonnade



A02 Entrance Court



B01 Entrance and Porches



Entrance Colonnades



B02 Entrance Arcade

3.7.2 Facade Articulation & Expression

The proposed buildings are designed to be sensitive to and compliment views of the station. The long elevations are often seen as a backdrop to the drum. These façades should be secondary in their architectural language but can have a strong and distinctive architectural character. We are interested in the expression of residential architecture built in the same period of the station. An emphasis is placed on making a legible character that is contemporary in its expression.

An 800mm raised sill to windows is used throughout for bedrooms and secondary windows to living spaces. This provides greater privacy for tenants and mitigates overlooking of neighbouring gardens.

We have investigated several options for the expression of the façades. Projecting banding has been introduced to group windows together and provide an overarching horizontal order.



Cholmeley Lodge, Highgate London, Guy Morgan 1934



Du Cane Court, Balham London, George Kay Green 1937



Square proportion raised sill windows - Create inelegant proportions



Continuous sill - Contrasting brick



Banding to head & sill - Homogeneous with light brick



Proposed banding to head & sill - Contrasting brick

Appendix 10: LBE viability consultant conclusions



PRIVATE AND CONFIDENTIAL

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London Borough of Enfield

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By email only: evie.learman@enfield.gov.uk

16 October 2020

Dear Evie,

ARNOS GROVE UNDERGROUND STATION CAR PARKS

We write further to your request for confirmation of the final viability conclusions regarding the proposed planning application at Arnos Grove Underground Station Car Parks for:

"Erection of 4 buildings between two to seven storeys high comprising 162 residential units (Class C3) and flexible use ground floor unit (A1/A3/A4) together with areas of public realm, hard and soft landscaping, access and servicing arrangements, plant and associated works".

In support of their offer of 40% affordable housing the Applicant submitted a viability assessment prepared by Savills dated April 2020. We summarise in Table 1 the overall scheme unit mix including the affordable housing units.

Table 1: Proposed Scheme Housing Mix

Tenue	1 Bed (2 Person)	2 Bed (3 Person)	2 Bed (4 Person)	3 Bed (5 Person)	Total
Market Rent	44	3	51	0	98
Discount Market Rent	28	3	4	10	45
Discount Market Rent at LLR Levels	12	2	1	4	19
Total	84	8	56	14	162

The Applicant's viability assessment set out their appraisal results and we summarise these in the tables below.

Table 2: Applicant's Appraisal Results (Current Day Appraisal)

Proposed Scheme Residual Land Value	Benchmark Site Value	Surplus/Deficit
c. - £4.67m	c. £3.45m	c. - £8.12m

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BNP PARIBAS REAL ESTATE

In summary, the Applicant's proposed scheme appraisal generates a negative residual land value of £4.67m and when benchmarked against a site value of c. £3.45m the scheme is unviable by c. £8.12m.

Table 3: Applicant's Appraisal Results (Growth Appraisal)

Proposed Scheme Residual Land Value	Benchmark Site Value	Surplus/Deficit
c. - £2.38m	c. £3.45m	c. - £5.83m

In summary, the Applicant's proposed scheme appraisal (with an assumed 3% rental growth per annum) generates a negative residual land value of c. £2m and when benchmarked against a site value of c. £3.45m the scheme is unviable by c. £5.83m.

In June 2020, we issued our draft report to the Council which reviewed the Applicant's viability assessment and we summarise our appraisal results in the Tables below.

Table 5: BNPPRE Appraisal Results (Current Day Appraisal)

Proposed Scheme Residual Land Value	Benchmark Site Value	Surplus/Deficit
c. - £0.99m	c. £3.45m	c. - £4.44m

In summary, our current day appraisal generates a negative residual land value of c. £0.99m and when benchmarked against a site value of c. £3.45m the scheme generates a deficit of c. £4.44m.

Table 6: BNPPRE Appraisal Results (Growth Appraisal)

Proposed Scheme Residual Land Value	Benchmark Site Value	Surplus/Deficit
c. £2.28m	c. £3.45m	c. - £1.17m

In summary, our proposed scheme appraisal (with an assumed 3% rental growth per annum) generates a residual land value of c. £2.28m and when benchmarked against a site value of c. £3.45m the scheme is unviable by c. £1.17m.

Following our draft report we held further discussions with the Applicant regarding differences in appraisal assumptions such as capitalisation rates, profit rates in addition to information clarification requests. Following these discussions, we have concluded that the scheme cannot support more than 40% affordable housing on the basis of the tenure mix summarised in Table 1.

We trust that this letter meets your requirements. If you have any queries please do not hesitate to contact us.

Yours sincerely,

Jamie Purvis
Senior Associate Director

Appendix 11

Emerging LB Enfield Intermediate Housing Policy extracts with the Applicant's offer at Arnos Grove summarised in non-italicised:

- *The costs for all intermediate rented products (including London Living Rent, Discounted Market Rent, Affordable Private Rent and Intermediate Rent) should be affordable to households on incomes of £60,000 or less. (see also para 4.6.8 – LPItP supporting text to Policy H6)*
- *For dwellings to be considered affordable, annual housing costs, including mortgage payments (assuming reasonable interest rates and deposit requirements), rent and service charge, should be no greater than 40 per cent of a household's net income. (see also para 4.6.9 – LPItP supporting text to Policy H6)*
- *London Living Rent should be genuinely affordable with rents no greater than 40% of net household income.*

Unit	Average DMR (per month)	% of Assumed Annual Gross Income*	% of Assumed Net Income**	LLR (per month)	% of Assumed Annual Gross Income*	% of Assumed Net Income**
1B	£1,033	20.66%	29.51%	£924	18.48%	26.40%
2B3P	£1,225	24.5%	35.00%	£1,027	20.54%	29.34%
2B34	£1,243	24.86%	35.51%	£1,027	20.54%	29.34%
3B	£1,398	27.96%	39.94%	£1,129	22.58%	32.26%

* assuming £60,000 per annum, or £5,000 per month as per the GLA cap

** assuming net income is 70% of gross income as per the GLA guidelines i.e. £42,000 per annum, or £3,500 per month

- *An Intermediate product should be no greater than 70%-80% of market rent and no greater than 40% of net household income.*

30% of the affordable homes at Arnos Grove are proposed at rent levels equivalent to London Living Rent for the Southgate Green ward where the site is located. The 2020/2021 London Living Rent levels have been assumed as summarised below:

	Rent (per month)	Average % discount to market rent
1 bed	£924	62.6%
2 bed 3 person	£1,027	58.7%
2 bed 4 person	£1,027	57.9%
3 bed	£1,129	58.6%

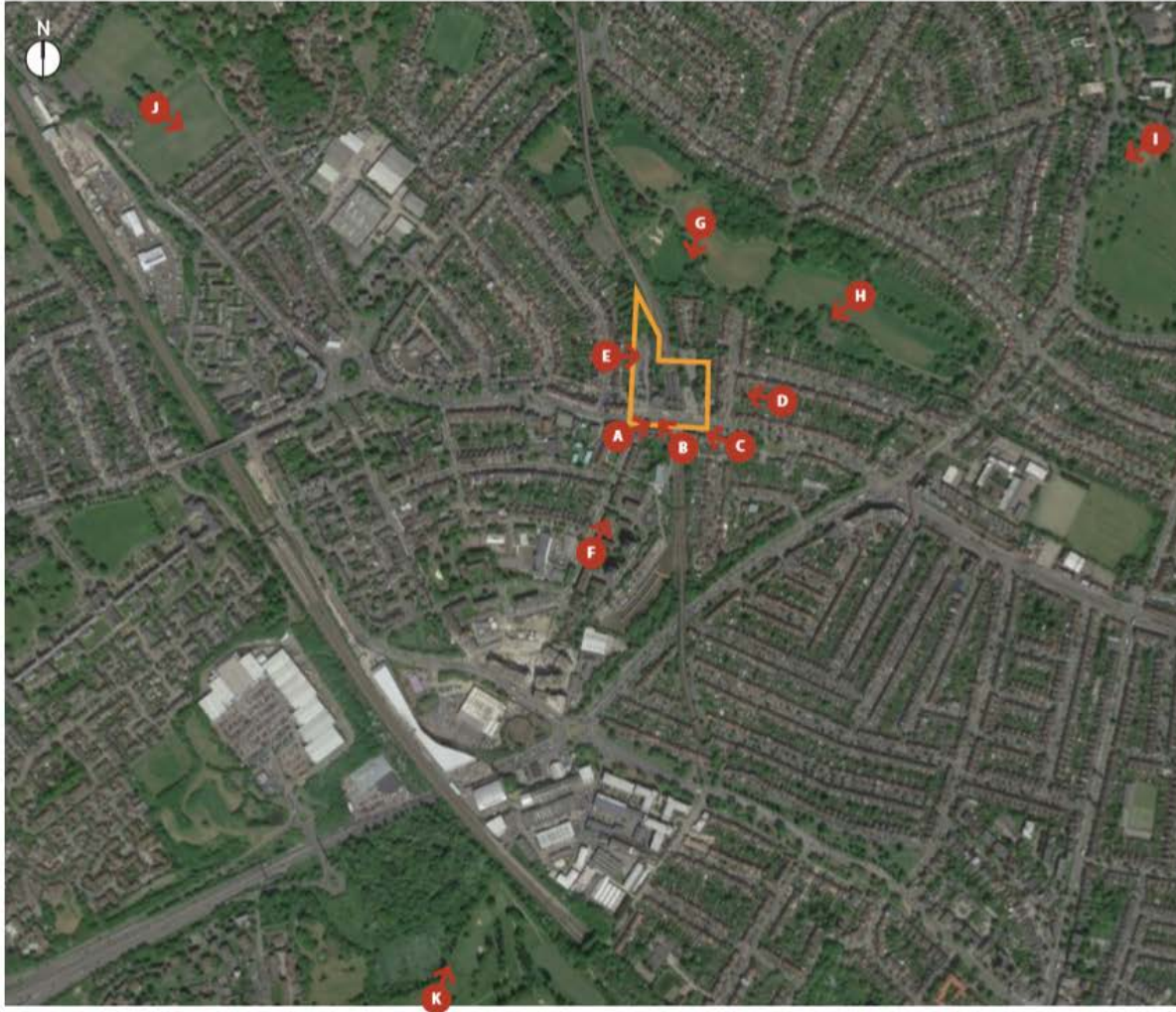
70% of the affordable homes at Arnos Grove are proposed as DMR with the 1- and 2-bedroom homes set at 70% of market rent and the 3 bedroom homes set at 65% of market rent.

Appendix 12



Aerial views of Arnos Grove Local Centre and Arnos Grove Station

Appendix 13: Townscape Visual Impact Assessment (Verified Views)



Views for assessment

- A** View from Bowes Road/Palmers Road
- B** View from railway bridge
- C** View from Bowes Road (Opposite Arnos Road)
- D** View from Seafield Road
- E** View from Brookdale Road
- F** View from Springfield Road/Palmers Road
- G** View from Arnos Park (North-West)
- H** View from Arnos Park (South-East)
- I** View from Broomfield Park /Morton Way
- J** View from New Southgate Recreation Ground
- K** View from Muswell Hill Golf Club



View A - Proposed view from Palmers Road/Bowes Road



View B - Proposed view from Railway Bridge



View C - Proposed view from Bowes Road (opposite Arnos Road)



View D - Proposed view from Seafield Road



View E - Proposed view from Brookdale Road



View F - Proposed view from Springfield Road / Palmers Road



View G - Proposed view from Arnos Park (western section)



View H - Proposed view from Arnos Park (eastern section)



View I - Proposed view from Broomfield Park / Morton Way



View J - Proposed view from New Southgate Recreation Ground



© Hawk Davidson

View K - Proposed view from Muswell Hill Golf Club

Appendix 14: Blue Badge utilisation (existing)



October 2019
Car Park Surveys

SITE: Arnos Grove Western Car Park			
Time Period	Date	Day	Disabled Bays
00:15	10/10/2019	Thursday	1
01:15	10/10/2019	Thursday	
02:15	10/10/2019	Thursday	
03:15	10/10/2019	Thursday	
04:15	10/10/2019	Thursday	
05:15	10/10/2019	Thursday	
06:15	10/10/2019	Thursday	
07:15	10/10/2019	Thursday	1
08:15	10/10/2019	Thursday	2
09:15	10/10/2019	Thursday	4
10:15	10/10/2019	Thursday	3
11:15	10/10/2019	Thursday	3
12:15	10/10/2019	Thursday	3
13:15	10/10/2019	Thursday	3
14:15	10/10/2019	Thursday	3
15:15	10/10/2019	Thursday	3
16:15	10/10/2019	Thursday	2
17:15	10/10/2019	Thursday	1
18:15	10/10/2019	Thursday	1
19:15	10/10/2019	Thursday	
20:15	10/10/2019	Thursday	
21:15	10/10/2019	Thursday	
22:15	10/10/2019	Thursday	
23:15	10/10/2019	Thursday	
<hr/>			
00:15	12/10/2019	Saturday	
01:15	12/10/2019	Saturday	
02:15	12/10/2019	Saturday	
03:15	12/10/2019	Saturday	
04:15	12/10/2019	Saturday	
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18:15	12/10/2019	Saturday	3
19:15	12/10/2019	Saturday	4
20:15	12/10/2019	Saturday	4
21:15	12/10/2019	Saturday	4
22:15	12/10/2019	Saturday	3
23:15	12/10/2019	Saturday	2

Appendix 15: Trees

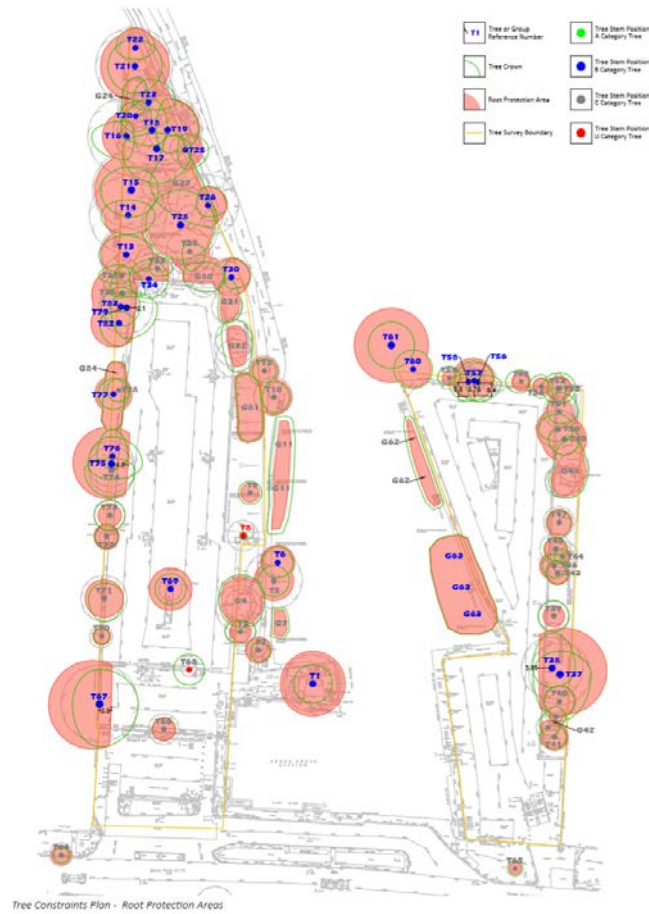
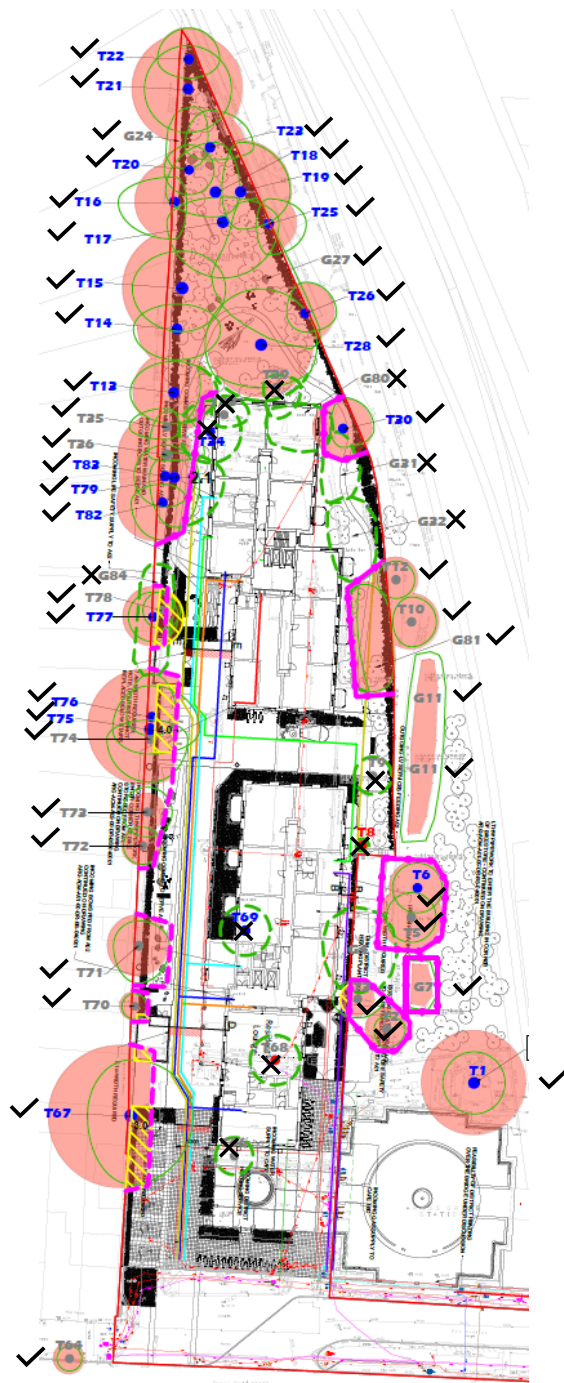


Table 1: Trees/Groups in each Retention Category

BS Category	No. of individual Trees	No. of Tree groups	Total
A	0	0	0
B	33	1	34
C	35	13	48
U	2	0	2
Total	70	14	84

Table 2 – Tree Features Proposed for Removal by BS Category

Category A Trees/Groups	Category B Trees/Groups	Category C Trees/Groups	Category U Trees/Groups
0	T34, T69	G4, T9, T29, G31, G32, T33, T39, T40, G42, T43, T45, T46, T47, T50, T51, T66, G80, G84	T8, T68
0	2	18	2



- T1 Tree or Group Reference Number
- Tree Stem Position A Category Tree
- Tree Stem Position B Category Tree
- Tree Stem Position C Category Tree
- Tree Stem Position U Category Tree
- Tree Crown
- Root Protection Area



Descriptive analysis of equalities potential effects of proposed development

Reason	Characteristic ⁸ and Effect ⁹
<p>Taxi drop-off: Officers have secured re-provision of the 2 no. existing Transport for London taxi drop-off bays. These would need to be considered and designed within the context of existing policies and statutory obligations and duties – including Section 149 of the Equalities Act. This may positively impact upon older people and people with mobility issues and those travelling with children.</p>	<p>A (Positive / Neutral) D (Positive / Neutral) P (Positive / Neutral)</p>
<p>General drop-off: Officers have secured a commitment from the Applicant to work with the council to provide a drop-off location following closure of the existing car park, and during the construction phase. This would be monitored during the construction period – and would be subject to a future decision on arrangements. The obligation would be secured by Section 106 agreement and include a cascade mechanism. The existing drop-off arrangements are unsatisfactory – and have potential to give rise to impacts on some protected characteristic groups, including visually impaired people who are likely to find the current arrangement challenging with buses, taxis and private cars in conflict. The reconsideration of the current arrangement has potential benefits.</p>	<p>A (Positive / Neutral) D (Positive / Neutral) P (Positive / Neutral)</p>
<p>Blue badge parking re-provision (and enhancement): Blue badge parking will be re-provided. Blue badge space design, layout, lighting and surfacing is proposed to be improved. Officers are satisfied that re-provision of the 6 no. spaces is enough to respond to demand and have considered utilisation rates based on an Applicant survey conducted in October 2019 and site photos taken of blue badge spaces before February 2020. Expanded eligibility of the</p>	<p>D (Positive / neutral / negative - temporary)</p>

⁸ Age, Disability, Gender reassignment, Pregnancy and maternity, Race, Religion or belief, Sex, and Sexual Orientation, Marriage and civil partnerships

⁹ Neutral effects not noted (negative / positive effects noted)

Blue Badge scheme took place 30 August 2019. Gov.uk notes that people with hidden disabilities, including anxiety disorders or a brain injury, could apply for a Blue Badge from 30 August 2019. ¹⁰

The surveys undertaken in respect of Blue Badge utilisation were undertaken in October 2019. Site photos submitted by the Applicant range from early 2019 to late 2019 (4 no. photos were taken prior to 30 August 2019 and 3 no. were taken after 30 August 2019). As noted, average utilisation is 4 out of 6 blue badge spaces – indicating there is spare blue badge capacity at this station.

Blue badge parking will be re-provided. Blue badge space design, layout, lighting and surfacing is proposed to be improved. Officers are satisfied that re-provision of the 6 no. spaces is enough to respond to demand and have considered utilisation rates based on an Applicant survey conducted in October 2019 and site photos taken of blue badge spaces before February 2020.

During construction the proposals seek to close the car parks, which may have an impact upon older people using these blue badge spaces. As set out above, the blue badge spaces will be retained where possible during construction. There may however be changes to the availability or location of blue badge parking during construction, which would cause temporary disruption for older people who are more likely to experience some form of disability or have a mobility impairment, and therefore rely on blue badge spaces.

In respect of mitigation in respect of the temporary impact of construction on the existing blue badge spaces, the Applicant seeks to maintain blue badge parking throughout construction – although the location of these will move during construction phasing. Officers recommend that this be secured through

¹⁰ <https://www.gov.uk/government/news/people-with-hidden-disabilities-can-access-blue-badges-for-the-first-time-from-today>

a Construction Logistics Management Plan (CLMP), produced in line with TfL's latest CLMP guidance (to be secured by condition). The Applicant will also notify regular users by email or letter prior to full closure, to ensure those affected are notified in advance.

Public cycle parking re-provision (and enhancement): There are currently no non-standard cycle parking spaces at Arnos Grove station. Wheels for Wellbeing is a grassroots disability organisation and inclusive cycling charity based in London. It publishes guidance on inclusive cycling which notes that it is a 'common myth that Disabled people don't or can't cycle. According to Transport for London (TfL), in London alone 12% of Disabled people cycle regularly or occasionally, compared to 17% of non-Disabled people'. The study notes the lack of non-standard parking spaces as an obstacle to cycling.

Public cycle parking will be re-provided, and the number of spaces increased. 5% of cycle parking spaces proposed will be dedicated for non-standard cycles – representing an increase from current nil provision.

Loss of non-blue badge public car parking: The Applicant is not seeking to replace 297 no. public car parking spaces (non-blue badge parking spaces). The removal of the existing public car park (non-blue badge) will have an impact on individuals to varying degrees. The effects of the car park removal will affect all existing users (except blue badge) – including some with protected characteristics. This is not necessarily an equalities issue, but it may become one when any adverse effect on those with protected characteristics is disproportionate or differential.

There may be a differential equalities effect where people with a protected characteristic are affected differently to the general population as a result of vulnerabilities or restrictions they face because of that protected characteristic.

D (Positive)

A (Potentially negative)
D (Potentially negative)
P (Potentially negative)

Based on detailed consideration of representations, including objections received, and details submitted by the Applicant the loss of 297 no. public car parking spaces has potential to give rise to differential impacts, which require mitigation. The impacts, and potential effect, depend in part on geographic location (home address). This may have an impact upon older people who rely more on private vehicles to access local services and amenities. There may be a particular impact for older people who do not qualify for blue badges, but still find walking longer distances or navigating public transport more difficult. The may also impact those travelling with children, or while pregnant.

Officers have read individual representations and do not consider there is evidence to support a conclusion that those with any particular protected characteristic make up a greater proportion of those that stand to be affected than in the wider population. Officers do not consider there would be a disproportionate equalities effect. The removal 297 no. public car parking spaces removes this parking for all users (non-blue badge), while re-providing provision for blue-badge users. Strategically, most TfL stations do not have car parks.

In considering alternative options, Officers have also considered the dated condition of the existing public car park, including poor lighting, poor natural surveillance, existing potential hiding places, steep gradients, and perceived significance of the maximum distance of the furthest existing car parking spaces to the main station entrance. Officers have visited the site at various times, including night-time to consider these impacts. Officers have also requested site photographs, taken before February 2020 – to further consider the condition and use of the public car park over time. The PSED is a positive duty, and refusal of the proposal would result in retention of the existing design and layout of the car park. The design and layout of the existing public car park presents obstacles which may not meet the needs of all potential users –

risking discrimination and unequal opportunity. The existing design and layout of the public car park creates opportunities for anti-social behaviour, criminal activities, and does not create a sense of safety. As noted there is a relatively significant cross-fall across the site, with the steepest gradients located in the Site B car park. Officers have weighed a 'do nothing' approach which would preserve the existing car park, with its current disbenefits against delivery of the proposed scheme including benefits outlined.

Mitigation: In respect of mitigation the Applicant has identified alternative transport options to the station (considered above and below). Officers consider, that the travel plan coordinator role represents the best opportunity to manage the land use change – and loss of existing public car park (non-blue badge spaces). Officers have recommended an obligation in respect of Travel Plan monitoring, including appointment of a Travel Plan Coordinator.

Officers consider the most impactful and positive opportunity to mitigate this is to ensure scope of the travel plan coordinator include pre-commencement work, in tandem with the Applicant's communications strategy. Objections received include many which question alternative travel routes and options. Meaningful mitigation can be provided by linking the Applicant's intended communications strategy with the travel plan coordinator role – to identify and support existing users in making sustainable alternative travel choices. Alternative travel options include use of the Transport for London network, which includes underground and overground stations, an increasing number of which are becoming step free. All of TfL's buses are accessible. TfL's website has comprehensive details on transport accessibility and the measures and initiatives offered by TfL to help those who need to access and use the public transport system. This includes information on *planning an accessible journey*, *getting help from staff*, *Assisted Travel Services* and how to access these and *Travel Mentoring* to help build knowledge and confidence for people to use all

our services. Amongst other things TfL set out advice and guidance for step free access across the network and includes guidance for pregnant women and women with children who want to use public transport. <https://tfl.gov.uk/transport-accessibility/>

The coordinator would ensure existing car park users are provided with 'alternative local route' details as part of the Applicants proposals to notify car park users 6 months prior to the full car park closure to ensure minimal disruption and work with the car park operator (NCP) to notify regular users via email and letters. The Applicant also proposed to post notices in the car parks to ensure regular, and casual users are notified and publish details on the scheme website, and those who responded during the consultation will receive updates of any relevant changes. Officers recommend that s106 planning obligations be used to ensure that the travel plan coordinator is appointed prior to commencement.

Alternative journey planner communications / travel plan coordinator strategy: As set out above, Officers have carefully assessed the details submitted by the Applicant and individual objections in considering local alternative options, including underground stations with step-free arrangements and public facilities. Officers have concluded that these present credible alternatives. In some cases, journey times using 'local alternative options' may be less than existing journey times. Officers consider while there may be an impact on individuals who primarily use a motor vehicle as a mobility aid – 'local alternative options' exist and will remain.

Officers have concluded that these present credible alternatives. In some cases, journey times using 'local alternative options' may be less than existing journey times. The travel plan coordinator role would have a beneficial effect in this context.

A (Positive)
D (Positive)
P (Positive)

The Applicant has submitted details that identify public transport routes which provide alternative transport to the station. The Applicant has also undertaken research conducted on the utilisation of the car parks indicating that 33% of all car-park users are within walking distance of an underground station, and 50% within walking distance of a national rail station. This is based on the PTAL assessment which recommends walking distances of 960m for rail and underground stations, and 640m for bus stops. A further 68% of car-park users are within walking distance of a bus route that serves Arnos Grove station. 99% of users are within 960m away from a station or 640m away from a bus stop serving Arnos Grove. This research demonstrates that most users have alternative means of travel available to them and are not prevented from travelling on the network due to the changes.

Public realm design (including proposed new square): The proposals include areas of high-quality public realm that will be accessible and inclusive to the entire community with street furniture, improved lighting and increased seating areas. Accessible design principles have been considered in order to ensure the local community, existing and future residents with mobility restrictions can use the new facilities and public realm with ease. Feeling unsafe and being unsafe in an area can be a barrier to travel for protected groups such as Women, BAME and LGB Londoners. Enhanced public realm design could have a positive effect in this respect.

Potential for lower traffic volumes: Where mobility is impaired, this can make walking or crossing more complex for people and they may take longer to cross. If traffic reductions were experienced, which is expected, then these lower traffic volumes are likely to benefit people who need more time to cross. Officers have secured a package of mitigations, to support local transport improvements. Visually impaired people will be pedestrians, users of public

A (Positive / Neutral)
D (Positive / Neutral)
P (Positive / Neutral)
S (Positive / Neutral)
Ra (Positive / Neutral)
So (Positive / Neutral)

A (Positive / Neutral)
D (Positive / Neutral)
P (Positive / Neutral)
S (Positive / Neutral)

transport or passengers in other vehicles. Visually impaired are likely to benefit from decreased traffic flows and enhancements to public realm, although the initial change could be confusing. Community members with learning difficulties and developmental disorders may struggle to process changes to their daily life such as a route they regularly walk with a different flow of traffic during construction and proposed development. The applicant will be required to manage construction and submit a Construction Logistics Management Plan – which would include managing communications in respect of the development. There is a local school in the area which hosts SEN children and has an ARP for pupils with autism. There may be a positive impact on children who currently walk and cycle – if the scheme reduces traffic in the area, which is expected.

If traffic reductions were experienced, which is expected, then these lower traffic volumes are likely to benefit people who need more time to cross which could benefit older people. Feeling unsafe and being unsafe in an area can be a barrier to travel for protected groups such as Women, BAME and LGB Londoners. Enhanced public realm design could have a positive effect in this respect.

Bus interchange: There is scope for a specification to be agreed for Section 278 (Highways) works and the Applicant has stated that they will 'work with Enfield borough regarding the layout, operation and public realm associated with the bus interchange outside the station'. Maintaining or improving this interchange will allow for easy public transport access to both the site and the wider area.

Accessible housing: 10% of units in the scheme are proposed to be accessible homes in accordance with the Building Regulation 2010 requirement M4(3): "Wheelchair user dwellings". All other units are proposed to

So (Positive / Neutral)
Ra (Positive / Neutral)

A (Positive / Neutral)
D (Positive / Neutral)
P (Positive / Neutral)

be designed in accordance with Building Regulation Standards M4(2), "Accessible and adaptable dwellings" to provide for other types of access needs and potential future requirements. The application site's high PTAL, residential facilities and the non-residential uses will be highly accessible to disabled persons who are not travelling by car. The scheme is well designed and would not restrict opportunities for groups with protected characteristics both within the proposed scheme and immediate vicinity.

Residential blue badge parking: The proposed residential development will include 5 no. blue badge spaces (3% of total housing provision), with a further 7% (11 no. spaces) being capable of being provided onsite if demand rises.

Affordable housing: Young people may benefit from the provision of affordable homes.

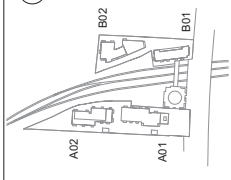
A (Positive / Neutral)
D (Positive / Neutral)

A (Positive / Neutral)
D (Positive / Neutral)

A (Positive / Neutral)

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— Site Boundary

0 Planning Submission RPU CW MAR 2022
Rev Details Dwn Chk Date

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Client
CCL

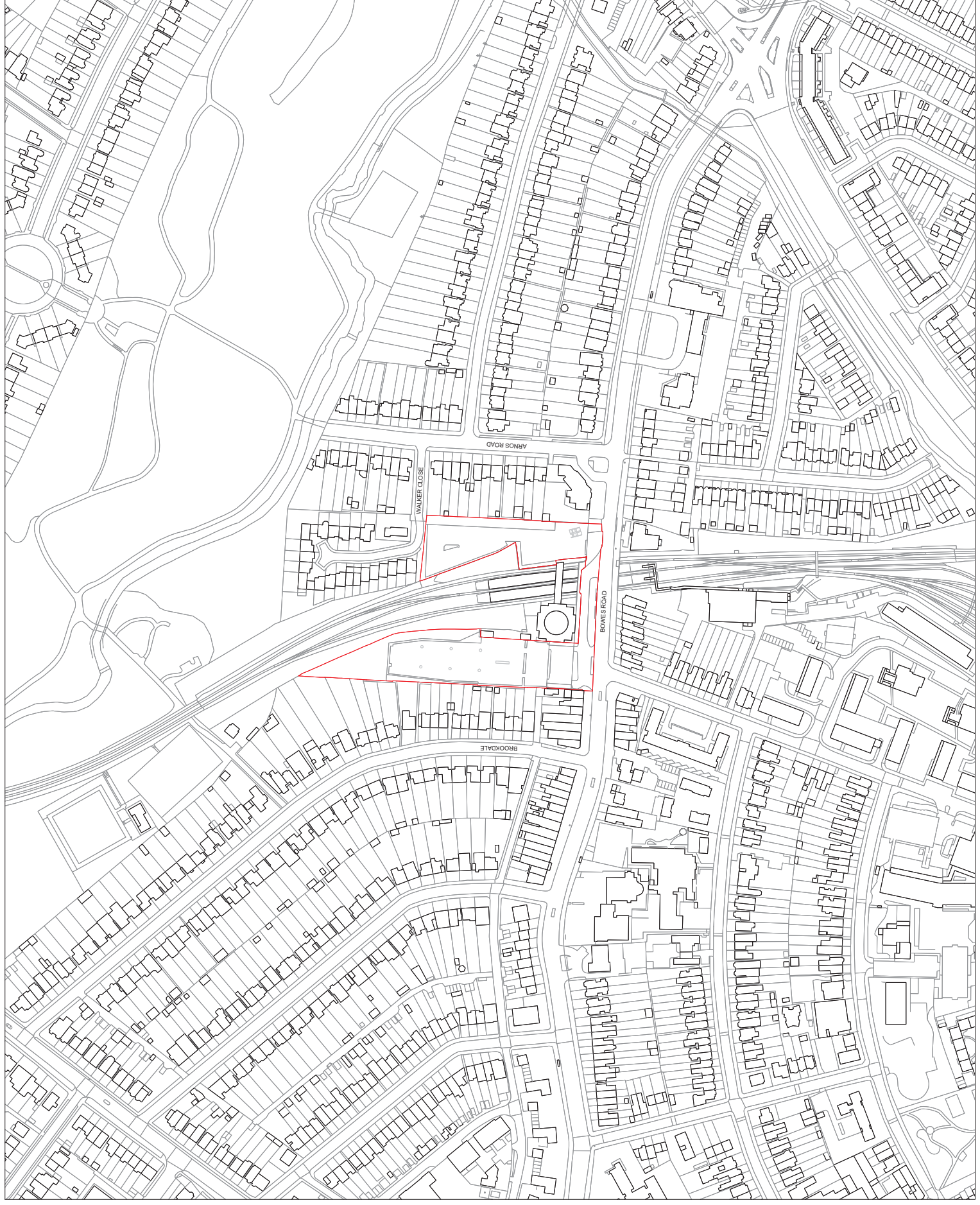
Project
Arnos Grove

Title
Location Plan

Scale
1:1,250 @ A1 / 1:2500 @ A3

MLUK-721-A-P-XX-0100

0



MATERIALS KEY

HARDWORKS

- 001 Exposed aggregate in situ concrete raft in 9 meter panels
- 002 Impermeable rigid small unit paving
- 003 Impermeable rigid small unit paving hexagons in bond
- 004 Impermeable exposed aggregate concrete paving
- 005 Permeable flexible paving
- 006 Informal concrete flag paving
- 007 Bark chip paths
- 008 Grasscrete
- 009 Play surface
- 010 Small unit paving with open joints stretcher bond
- 011 Impermeable flexible small unit paving
- 012 Hazard paving
- 013 Metal edging
- 014 Timber edging
- 015 Rain garden edging 300mm wide, 500mm deep
- 016 Rigid edging
- 017 Dropped kerb
- 018 Exposed aggregate concrete steps
- 019 Existing steps
- 020 Brick wall up to 500mm high
- 021 Brick wall up to 1500mm high
- 022 Brick wall up to 1000mm high with metal panels
- 023 Brick planter

FURNITURE

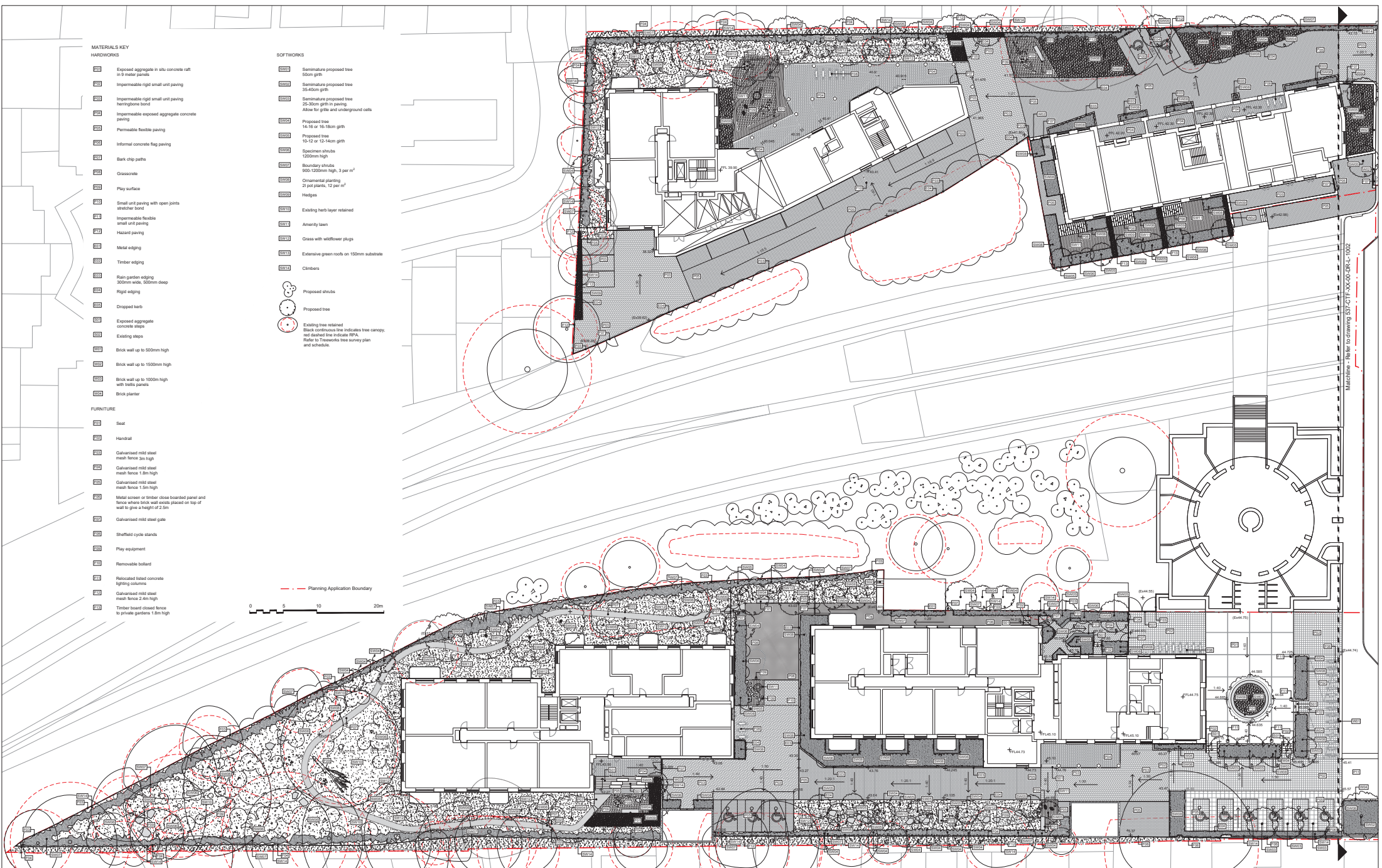
- 024 Seat
- 025 Handrail
- 026 Galvanised mild steel mesh fence 3m high
- 027 Galvanised mild steel mesh fence 1.5m high
- 028 Galvanised mild steel mesh fence 1.5m high
- 029 Metal screen or timber close boarded panel and fence where brick wall exists placed on top of wall to give a height of 2.5m
- 030 Galvanised mild steel gate
- 031 Sheffield cycle stands
- 032 Play equipment
- 033 Removable bollard
- 034 Relocated hoted concrete lighting columns
- 035 Galvanised mild steel mesh fence 2.4m high
- 036 Timber board closed fence to provide garden 1.5m high

SOFTWORKS

- 037 Semimature proposed tree 50cm girth
- 038 Semimature proposed tree 35-40cm girth
- 039 Semimature proposed tree 25-30cm girth to paving. Allow for grills and underground cells
- 040 Proposed tree 14-18 or 18-30cm girth
- 041 Proposed tree 10-12 or 12-14cm girth
- 042 Specimen shrubs 1200mm high
- 043 Boundary shrubs 900-1200mm high, 3 per m²
- 044 Ornamental planting 20 pot plants, 12 per m²
- 045 Hedges
- 046 Existing herb layer retained
- 047 Amenity lawn
- 048 Grass with wildflower plugs
- 049 Extensive green roofs on 150mm substrate
- 050 Climbers
- 051 Proposed shrubs
- 052 Proposed tree

Existing tree retained
Black continuous line indicates tree canopy, red dashed line indicates SPA. Refer to Treeworks tree survey plan and schedule.

--- Planning Application Boundary



Matchline - Refer to drawing 537-C1F-XX-00-DR-L-1002

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

Revision Tracker	Status	Date
0 - Planning Submission	P	MAR 2020
01 - Amendments to boundary fences, B1 communal garden converted into private gardens for ground floor units.	P	AGO 2020

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Date 08.11.2019
Scale 1:250/A1
Drawn FP/CC
Location LB Enfield
Client Connected Living London

Bristol
1.14 Temple Studios,
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Amos Grove
Landscape General Arrangement Plan

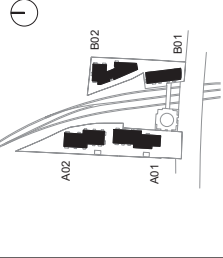
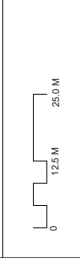
mail@churchmanthornhillfinch.co.uk

537-C1F-XX-00-DR-L-1000

Status
P
Revision
01

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— Site Boundary

Planning Decision Note

- Building A02 has been added to unit A01 (01-03) with 150mm high ramp to front.
- Building A02
 - Future change for unit A02-02 and A02-04-05.
 - Future change for unit A02-03 and A02-04-05.
 - A02-05-03 terrace parking added.
- Building B01
 - 700mm concrete separated panels added to eastern elevation.
 - 700mm concrete separated panels added to eastern elevation.
 - Communal garden to west of Building B01 reconfigured to 3m, please gardens.

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1	Planning Revision	GEM RFL AUG 2020
0	Planning Submission	RPU CW MAR 2020
Rev	Details	Drawn Chkd Date

Client
CCL

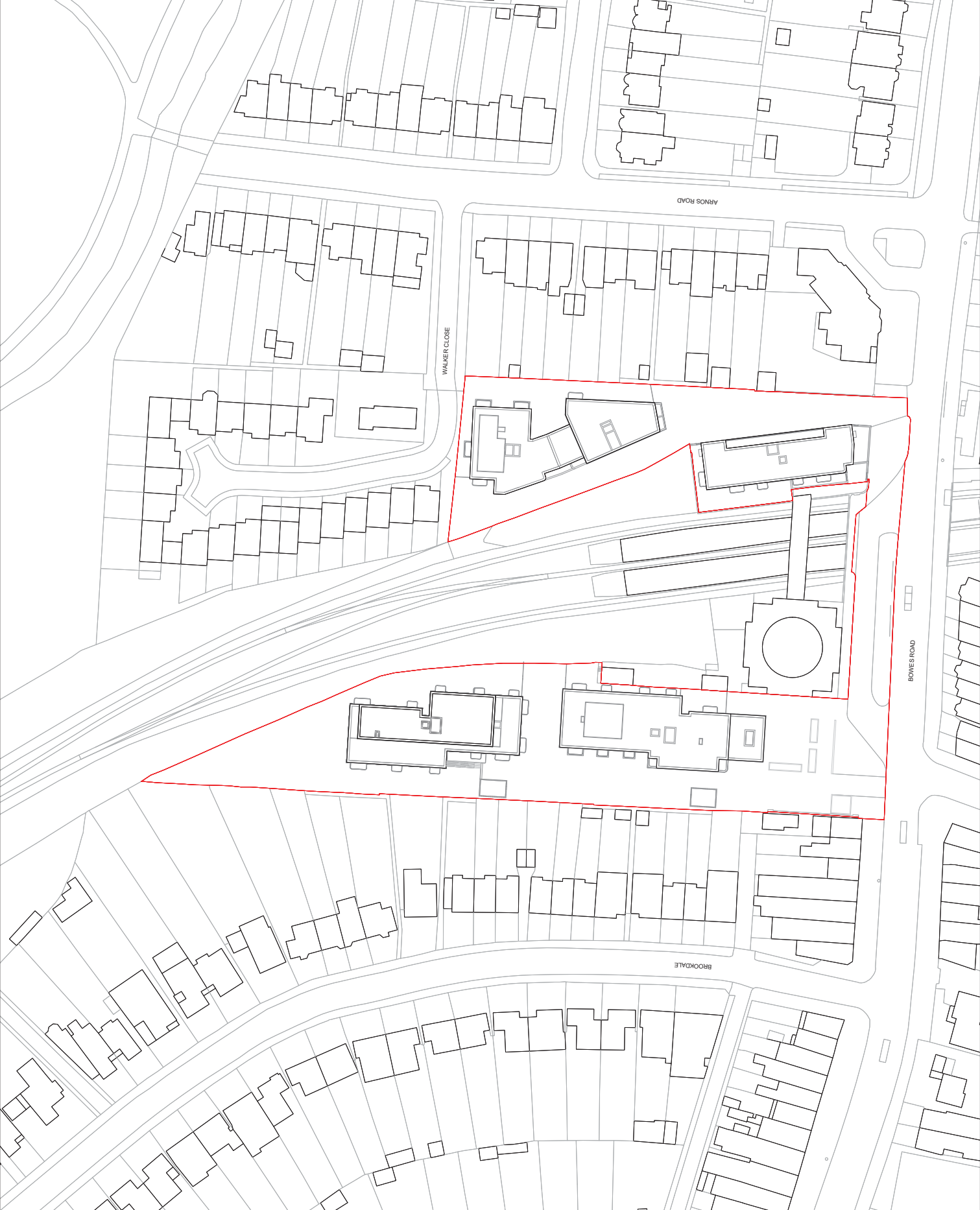
Project
Airtos Grove

Title
Proposed Site Plan

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

MLUK-721-A-P-XX-1010

1



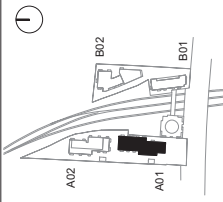
Block Plan



Strategic layout & Landscaped Buffers

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0 Planning Submission
Rev. Details
RFU CW MAR 2020
Drawn Chkd Date

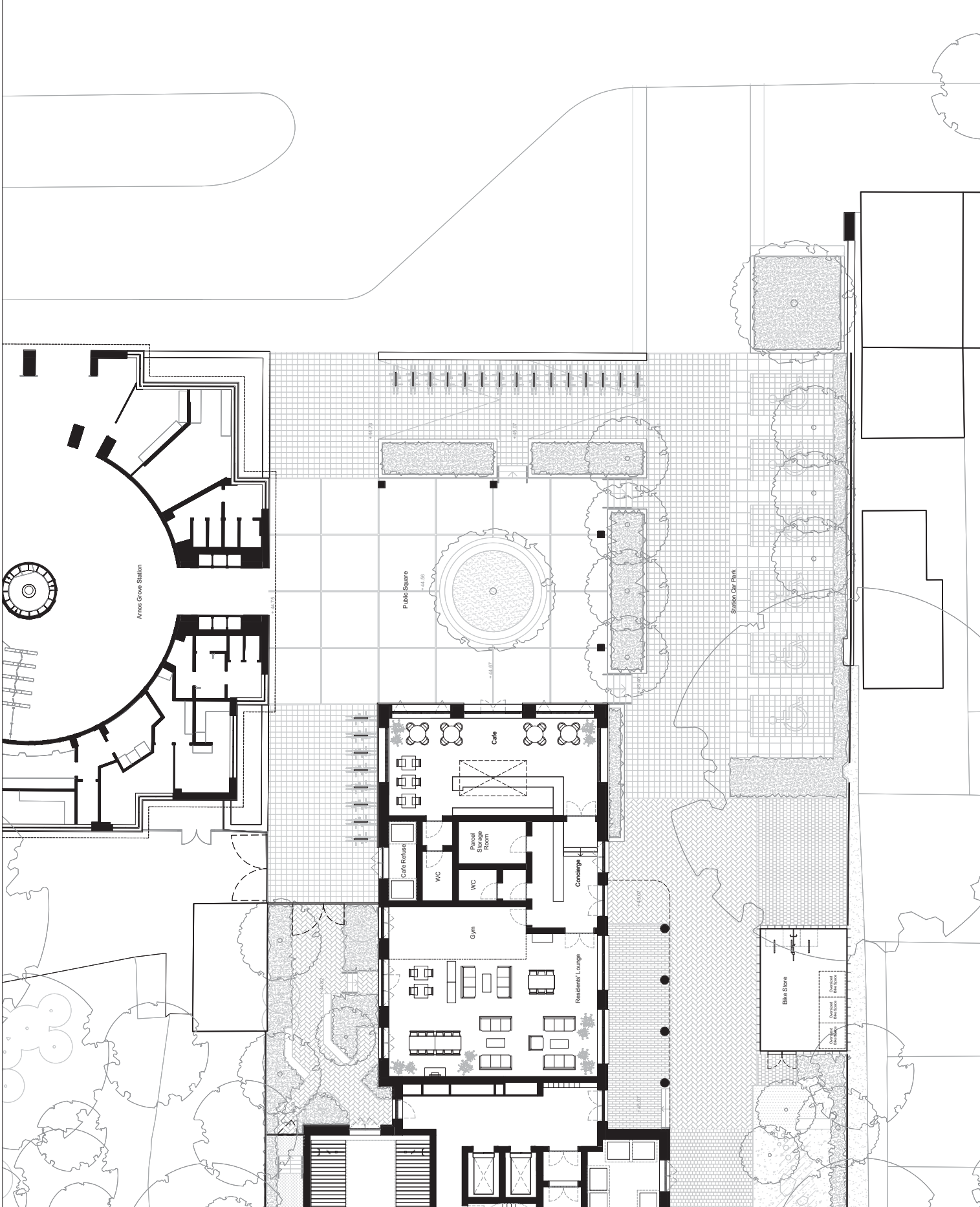
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Client
CCL
Project
Arnos Grove

Title
Public Square - Level 00 Proposed GA Plan
Scale
1:100 @ A1 / 1:200 @ A3

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



Public Square



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



High-angle view of the proposed Public Square



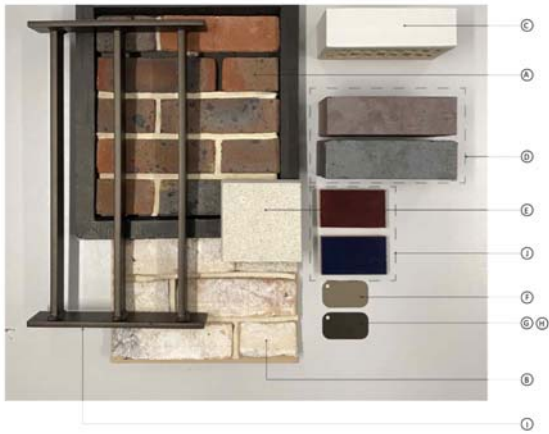
Proposal plan for the new Station Square

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



Site A 'Homezone' - View north to A02

Design and Access Statement: Extract (Materials and Details)

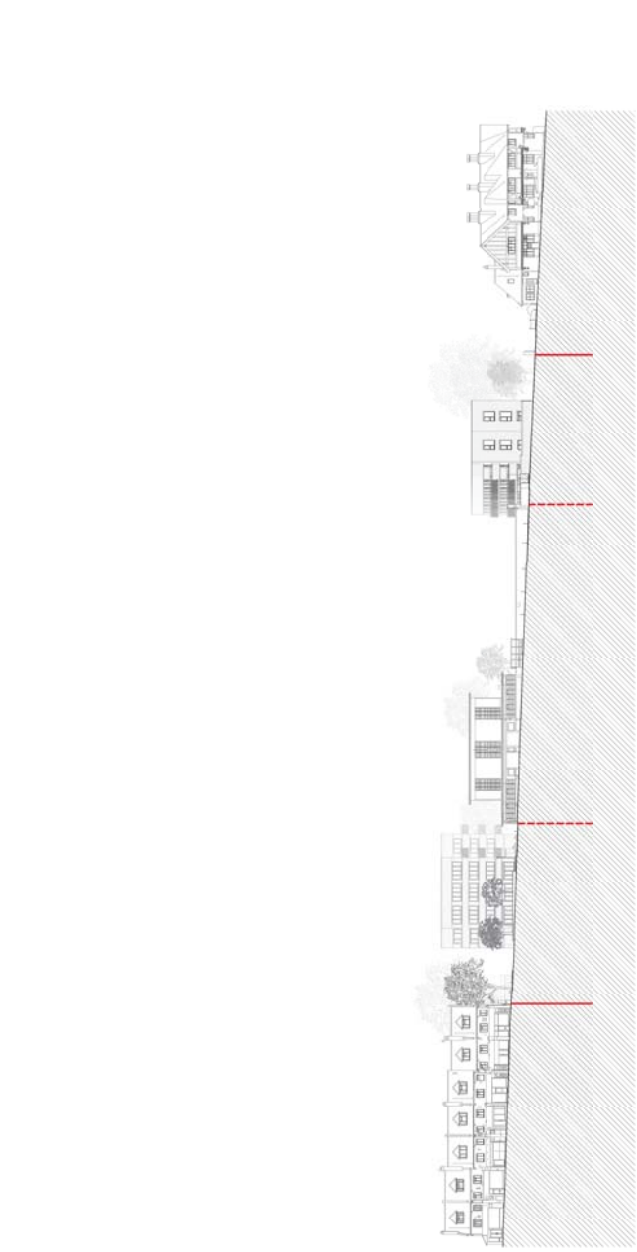
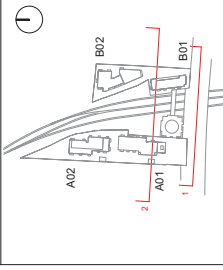


Item	Element Material
A	Principal Brickwork 01 Red / Orange handmade variegated clamp-fired stock facing brick, natural grey mortar.
B	Principal Brickwork 02 White/fluff textured handmade waterstruck brick, flush white mortar.
C	White Glazed Brickwork Blend White / off white blend, white mortar tbc.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

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Proposed Site Elevation 1 - South



Proposed Site Section 2 - South

0 Planning Submission RPU CW MAR 2022
 Rev. Details Drawn Chkd Date

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Client
 CLL
 Project
Airnos Grove

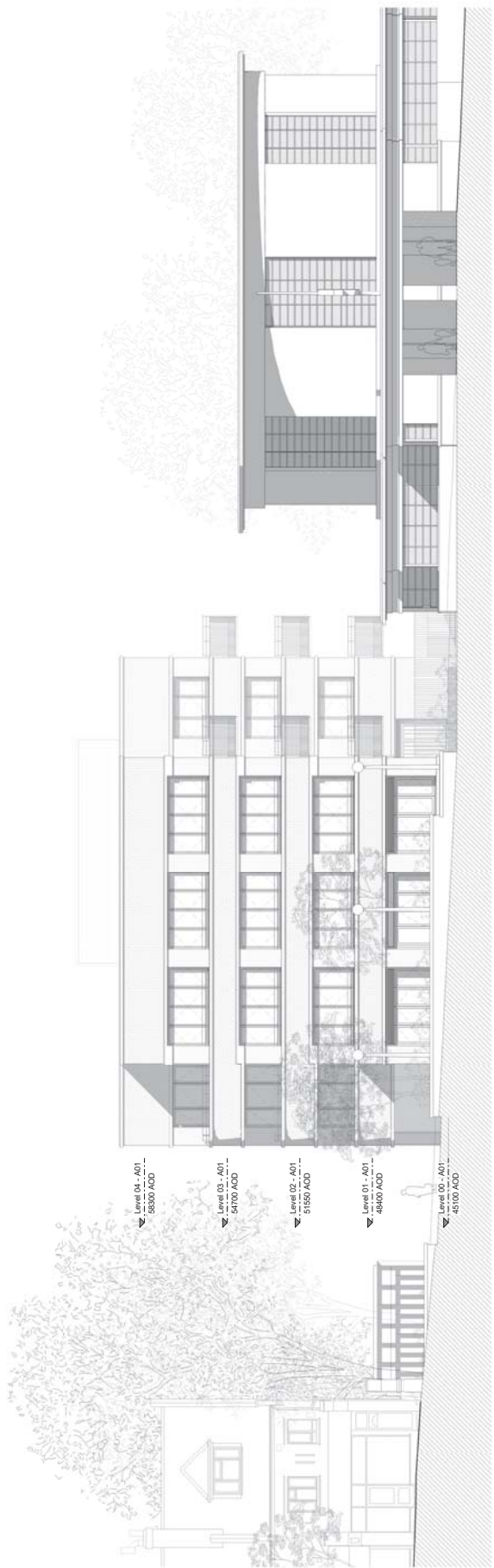
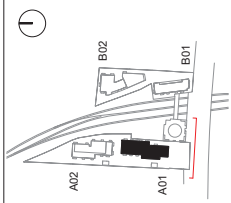
Title
 Proposed Site Elevations & Sections
 Scale:
 1:500 @ A1 / 1:1000 @ A3

MLUK-721-A-P-XX-1030

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- ▼ Level 04 - A01
3880 AOD
- ▼ Level 03 - A01
5170 AOD
- ▼ Level 02 - A01
5180 AOD
- ▼ Level 01 - A01
4840 AOD
- ▼ Level 00 - A01
4510 AOD

Rev. Details. Dim. Chkd. Date.

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Client
 CLL
 Project
 Ainos Grove

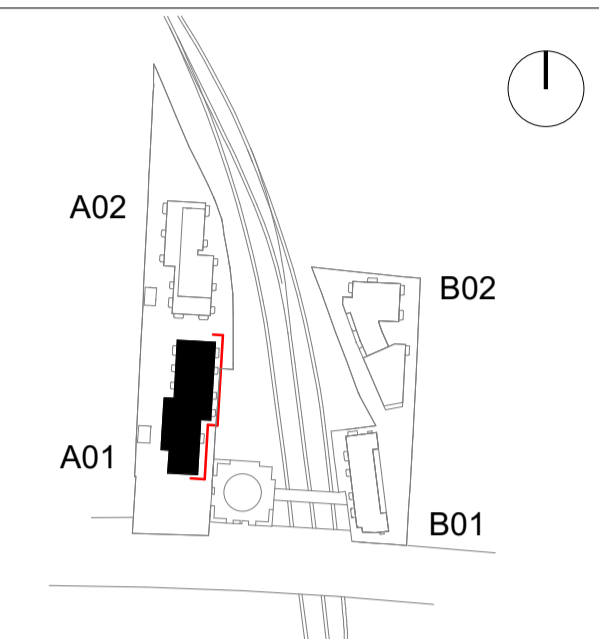
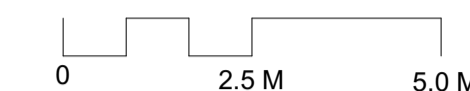
The Public Square Elevation - South
 Scale:
 1 : 100 @ A1

MLUK-721-A-P-A0-3100

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Planning Revision Note

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

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

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Client
CLL
Project
Arnos Grove

Title:
Bldg A01 Elevation - East

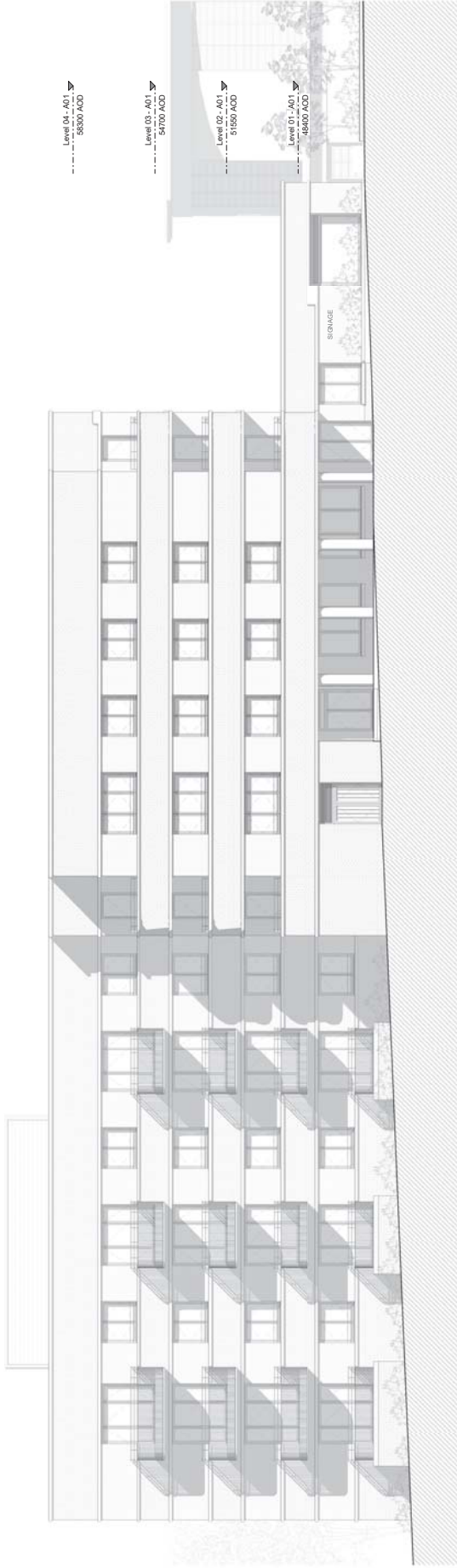
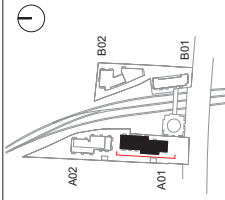
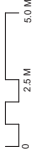
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0 Planning Submission Rev. Details

RFJ CW MAR 2020

Drawn Date

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Client

CLL

Project

Ainos Grove

File

Blog A01 Elevation - West

Scale:

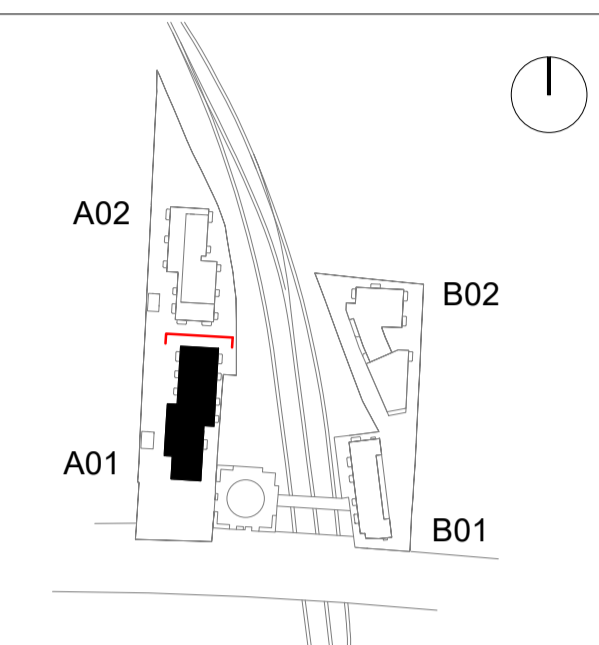
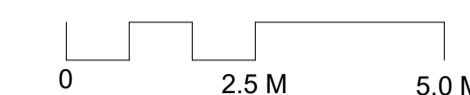
1 : 100 @ A1

MLUK-721-A-P-A1-3111

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0	Planning Submission	RPJ	CW	MAR 2020

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e uk@ml-architects.com

Client
CLL
Project
Amos Grove

Title:
Bldg A01 Elevation - North

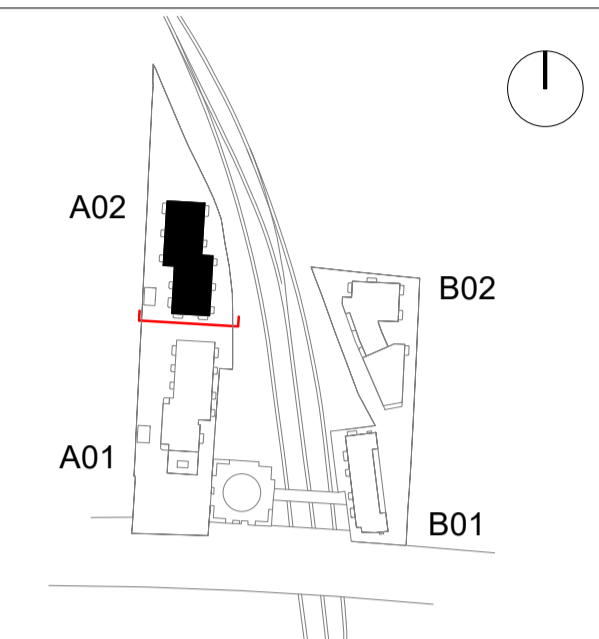
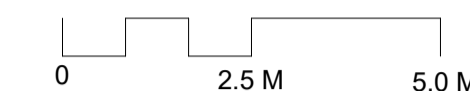
Scale:
1:100 @ A1

MLUK-721-A-P-A1-3112 0

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e uk@ml-architects.com

Client
CLL
Project
Arnos Grove

Title:
Bldg A02 Elevation - South

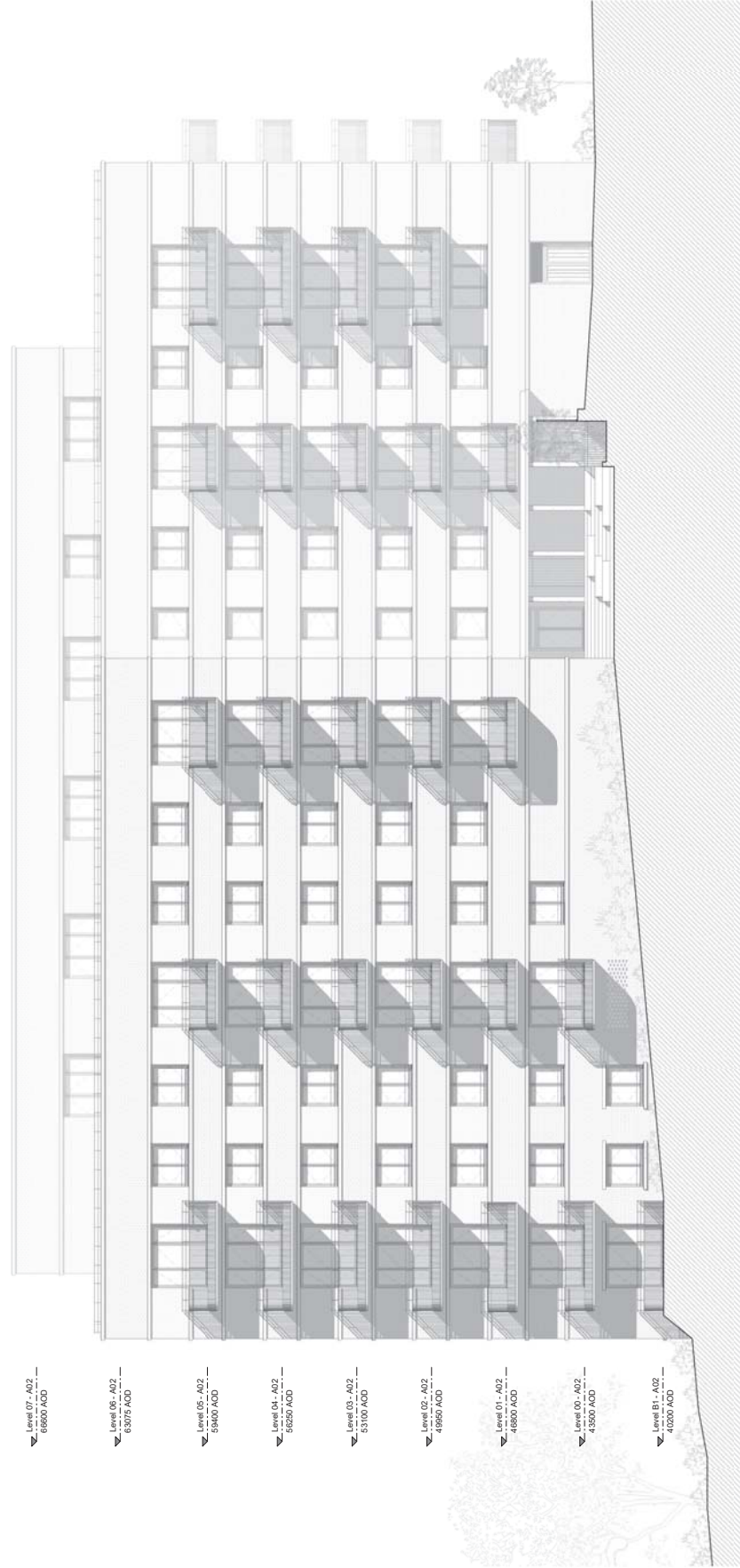
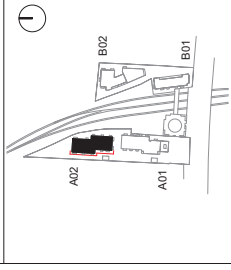
Scale:
1:100 @ A1

MLUK-721-A-P-A2-3120 **0**

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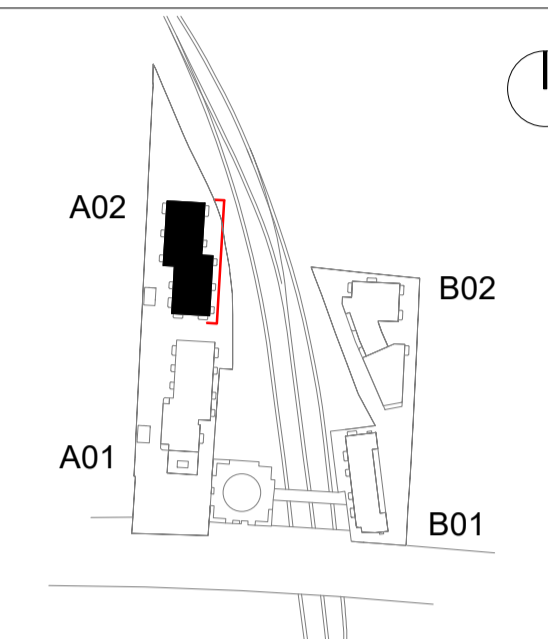
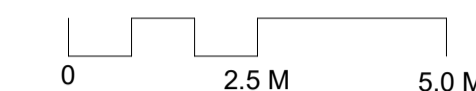
- ▼ Level 07 - A02
6680 ACD
- ▼ Level 06 - A02
6207 ACD
- ▼ Level 05 - A02
5840 ACD
- ▼ Level 04 - A02
5625 ACD
- ▼ Level 03 - A02
5310 ACD
- ▼ Level 02 - A02
4950 ACD
- ▼ Level 01 - A02
4680 ACD
- ▼ Level 00 - A02
4360 ACD
- ▼ Level B1 - A02
4020 ACD

0	Planning Submission	RFJ	CW	MAR 2020
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77 Beetham Street London, EC1V 9PZ				
t +44 (0)20 7334 7163 e uk@ml-architects.com				
Client	Ainos Grove			
Project	Ainos Grove			
The Bldg A02 Elevation - West				
Scale:	1:100 @ A1			
MLUK-721-A-P-A2-3121				
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- Level 07 - A02
66600 AOD
- Level 06 - A02
63075 AOD
- Level 05 - A02
59400 AOD
- Level 04 - A02
56250 AOD
- Level 03 - A02
53100 AOD
- Level 02 - A02
49950 AOD
- Level 01 - A02
46800 AOD
- Level 00 - A02
43500 AOD
- Level B1 - A02
40200 AOD

Planning Revision Note

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

Rev	Details	Drwn	Chkd	Date
1	Planning Revision	GEM	RPJ	AUG 2020
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Client
CLL
Project
Arnos Grove

Title:
Bldg A02 Elevation - East

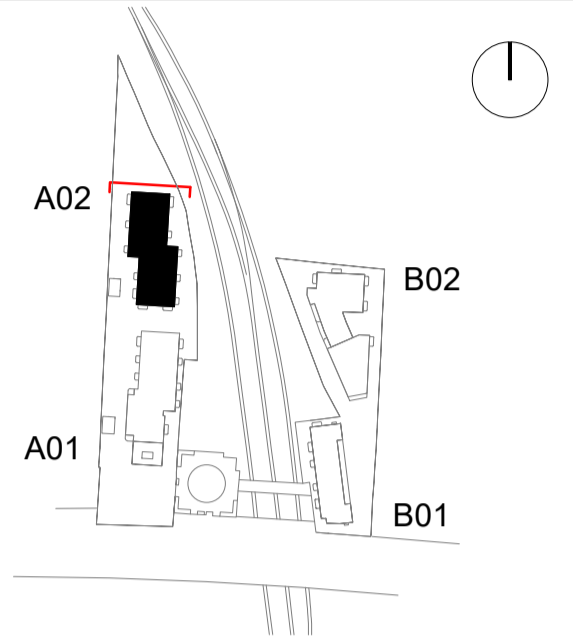
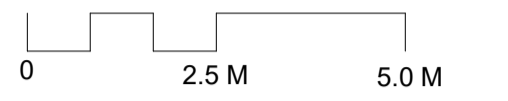
Scale:
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Client
CLL
Project
Amos Grove

Title:
Bldg A02 Elevation - North

Scale:
1:100 @ A1

MLUK-721-A-P-A2-3122

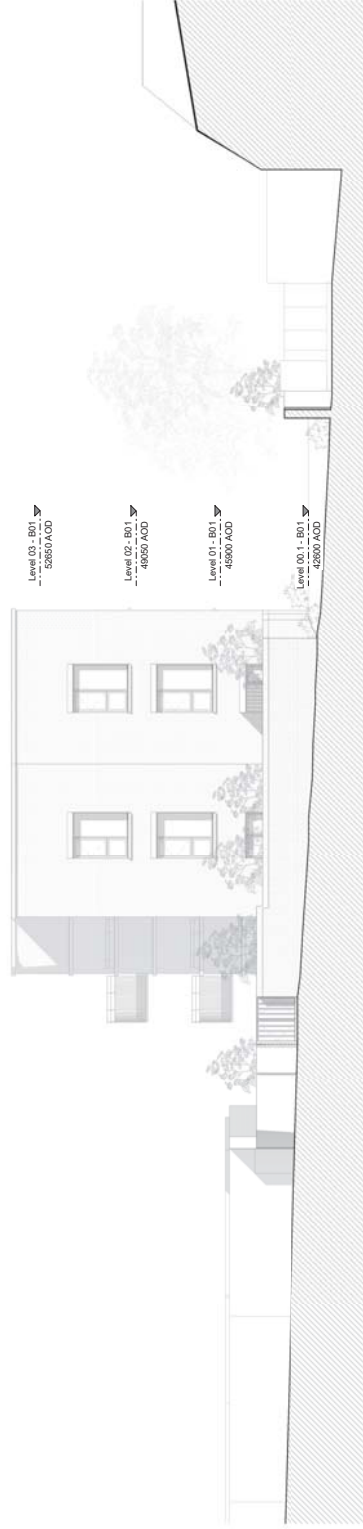
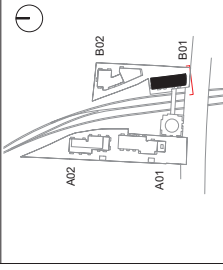
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Maccrennot Leighton

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e uk@ml-architects.com

Client
MCLL
Project
Ainos Grove

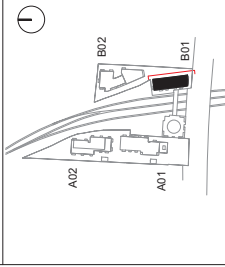
File
Bldg B01 Elevation - South
Scale
1:100 @ A1

MLUK-721-A-P-B1-3130

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Planning Elevation Note

- Building A01: Windows added to unit A01-01-03 with 1.35m high railing to front.
- Building A02
 - Feature change for unit A02-05-02 and A02-06-05.
 - A02-05-03 terrace paving alignment corrected.
 - A02-05-03 terrace guarding added.
- Building B01
 - 700mm concrete screeded panels added to eastern facade.
 - Commercial garden to west of Building B01 reconfigured to 3m private gardens.

Rev	Details	Drawn	Checked	Date
1	Planning Revision	GEM	RFJ	AUG 2020
0	Planning Submission	RFJ	CW	MAR 2020

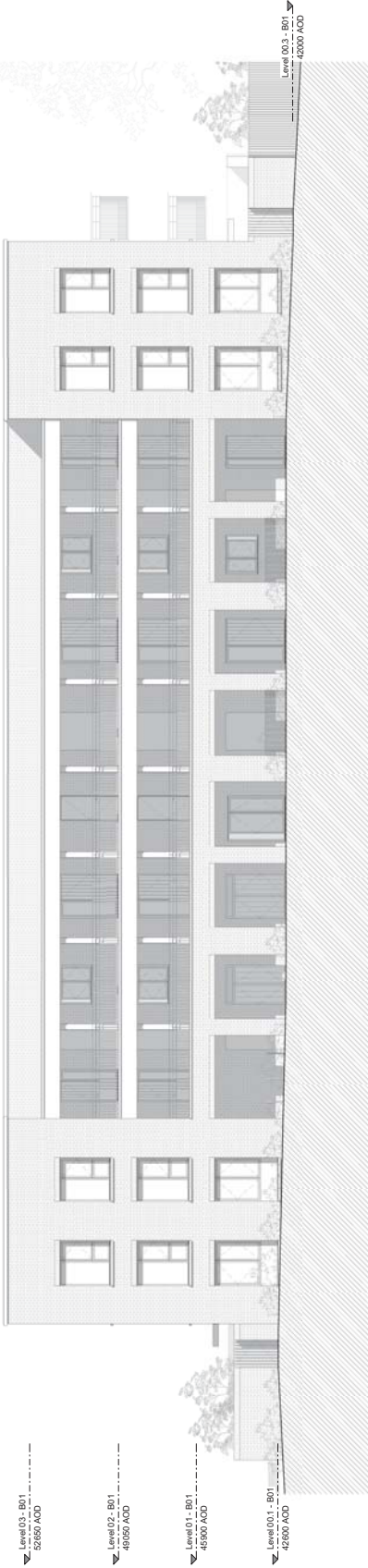
maccrennerlovell.com

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t: +44 (0)20 7156 7153
e: uk@ml-architects.com

Client
CLL
Project
Atrios Grove

Title
Bldg B01 Elevation - East
Scale
1:100 @ A1

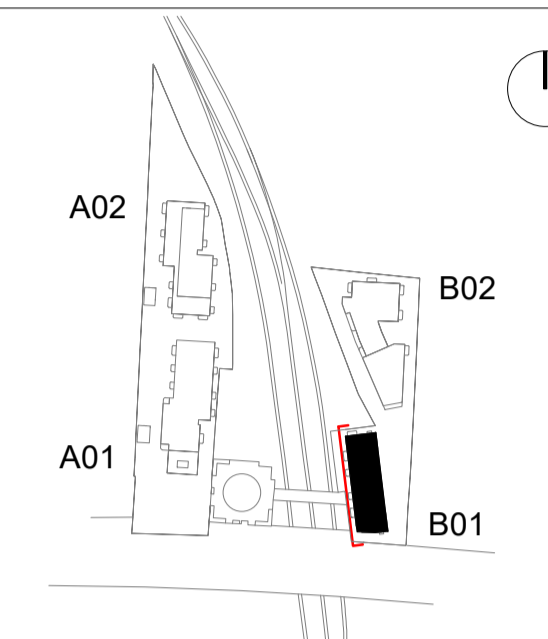
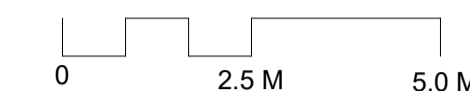
MLUK-721-A-P-B1-3133



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e uk@ml-architects.com

Client
CLL
Project
Arnos Grove

Title:
Bldg B01 Elevation - West

Scale:
1:100 @ A1

MLUK-721-A-P-B1-3131

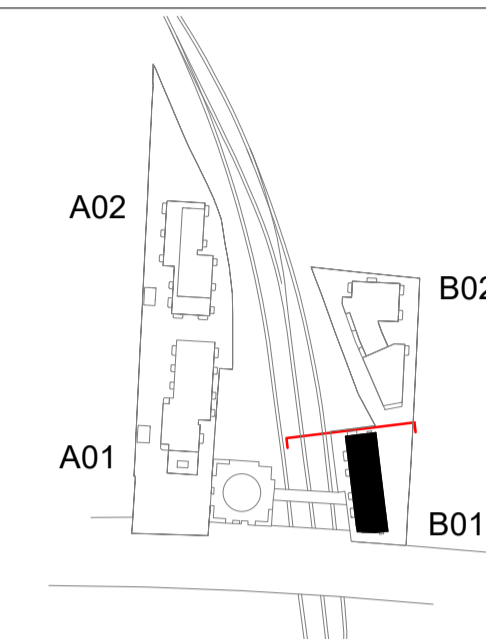
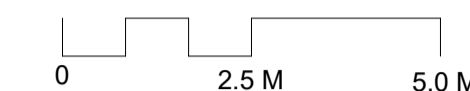
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Client
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Project
Arnos Grove

Title:
Bldg B01 Elevation - North

Scale:
1:100 @ A1

MLUK-721-A-P-B1-3132

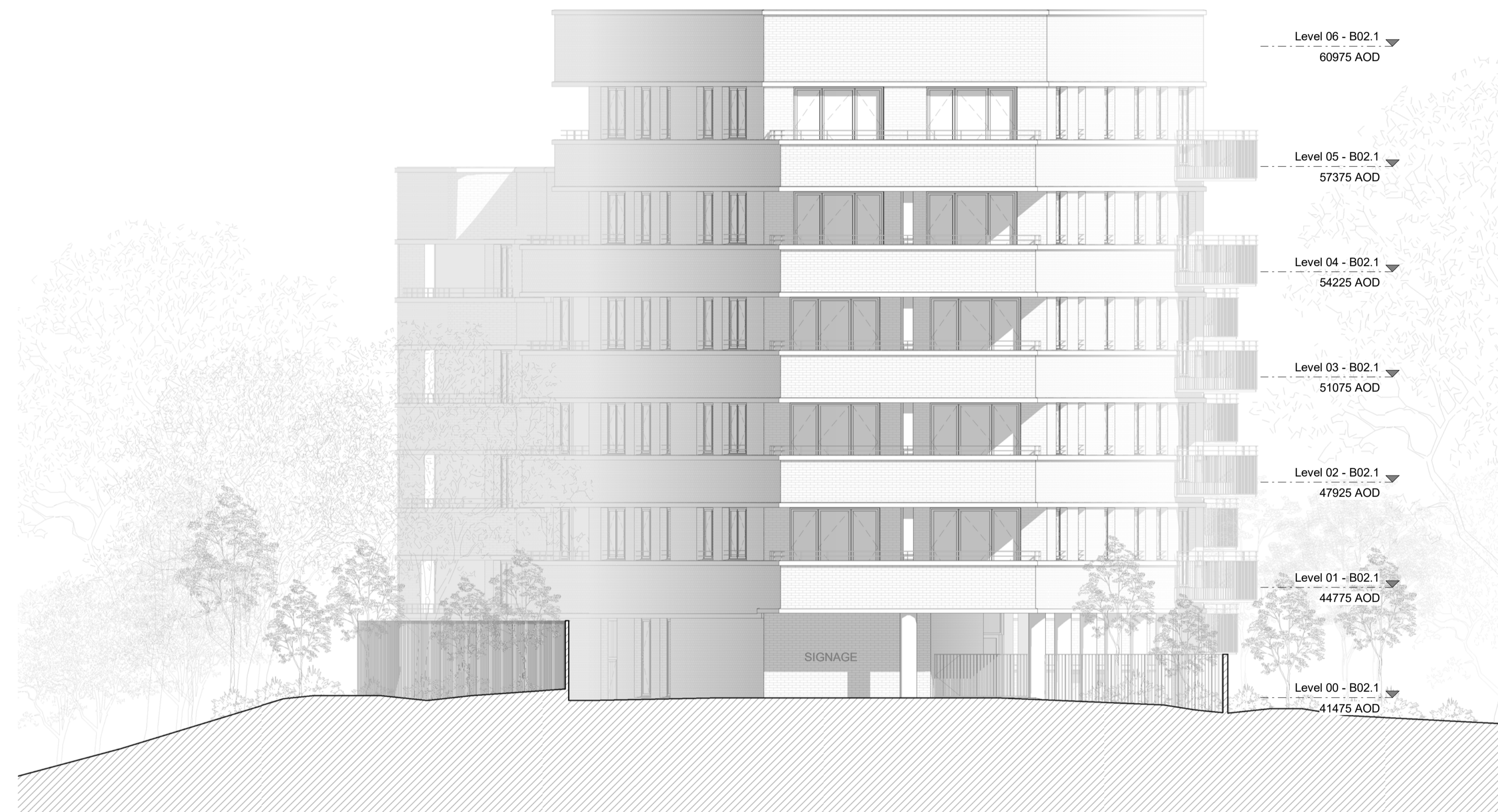
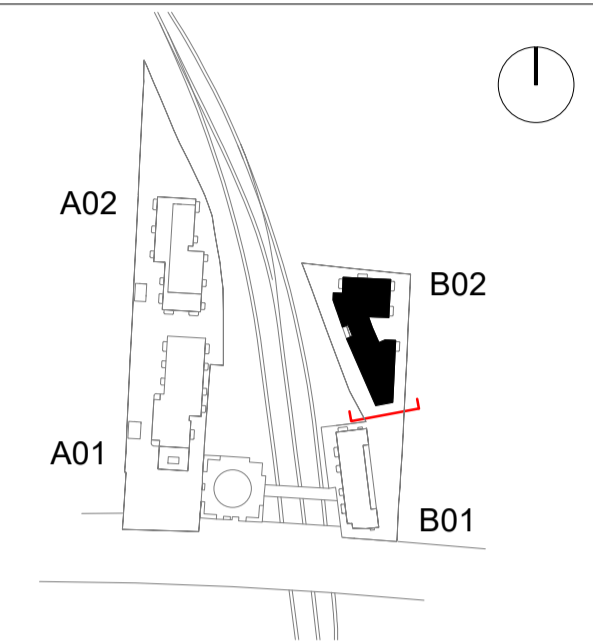
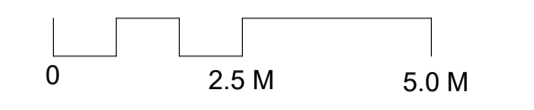
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Client
CLL
Project
Amos Grove

Title:
Bldg B02 Elevation - South

Scale:
1:100 @ A1

MLUK-721-A-P-B2-3140

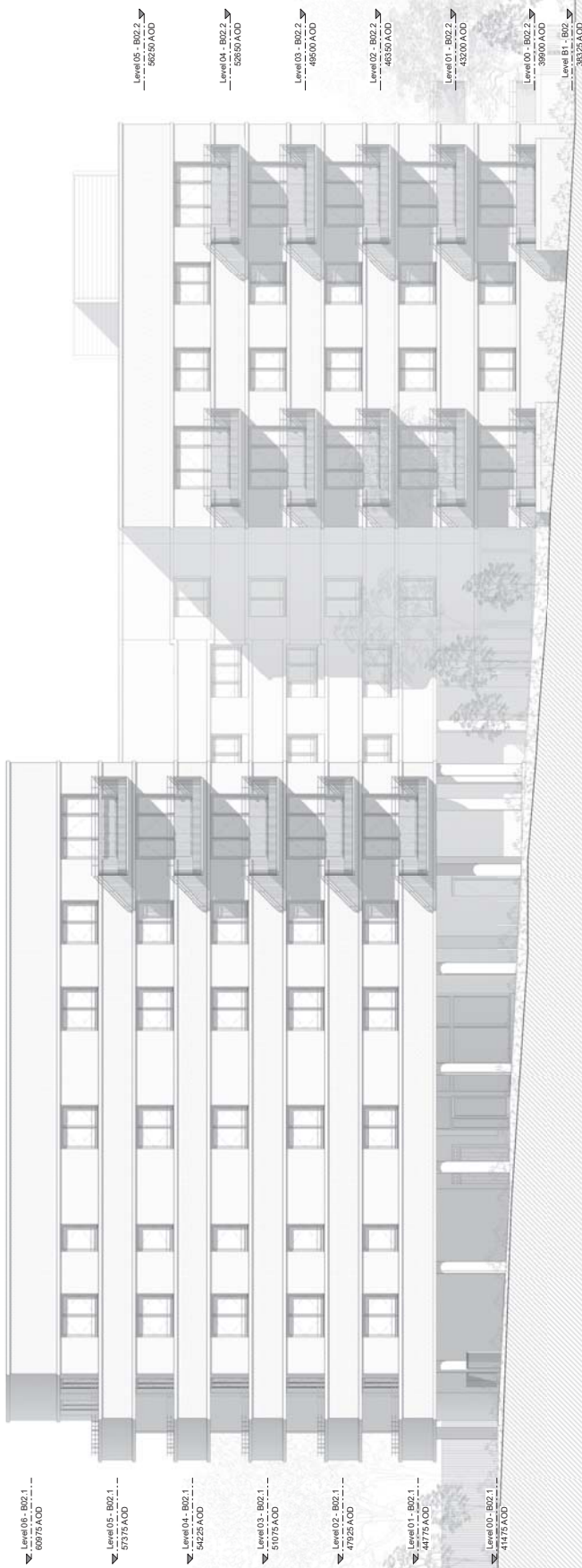
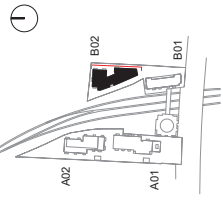
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	Divn				
	Chkd				
	Date				

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e uk@ml-architects.com

Client
CLL

Project
Airnos Grove

File
Bldg B02 Elevation - East

Scale
1:100 @ A1

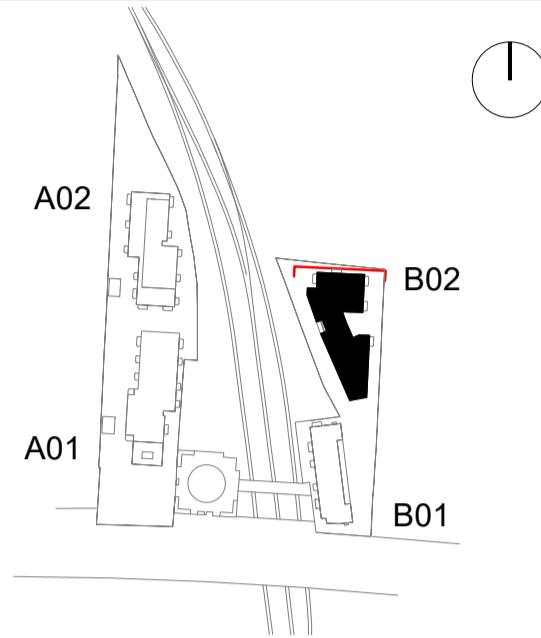
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Rev	Details	Drwn	Chkd	Date
0	Planning Submission	RPJ	CW	MAR 2020

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e uk@ml-architects.com

Client
CLL
Project
Amos Grove

Title:
Bldg B02 Elevation - North

Scale:
1:100 @ A1

MLUK-721-A-P-B2-3142

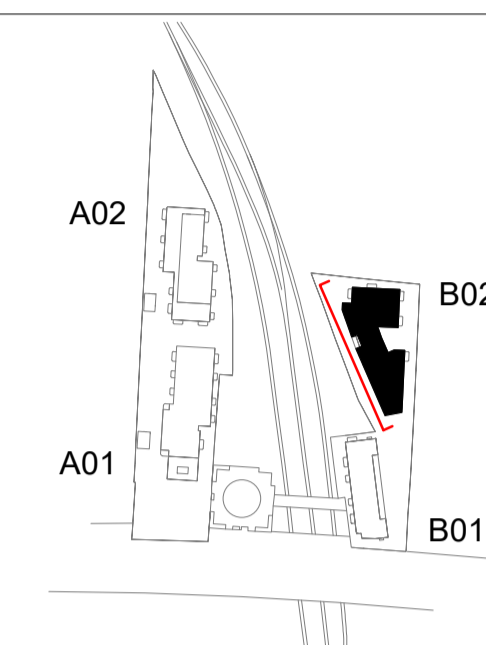
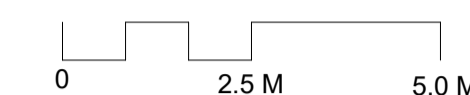
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Client
CLL
Project
Arnos Grove

Title:
Bldg B02 Elevation - West

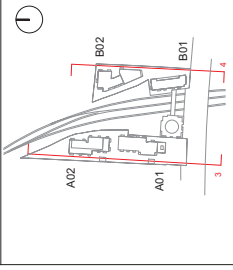
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MLUK-721-A-P-B2-3141

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— Site Boundary

Planning Elevation Note

- Building A01: Windows added to unit A01-01-03 with 1350mm high railing to front.
- Building A02:
 - Frame change for unit A02-05-02 and A02-06-05.
 - 700mm concrete parapet added to eastern elevation of unit A02-05-02 and A02-06-05.
 - A02-05-03 terrace guarding added.
- Building B01:
 - 700mm concrete parapet added to eastern elevation of unit B01-01-01 and B01-01-02.
 - Commercial garden to west of Building B01.
 - 3m² private gardens.

1	Planning Revision	GEM	RFJ	AUG 2020
0	Planning Submission	RFJ	CW	MAR 2020
Rev	Details	Drawn	Chkd	Date

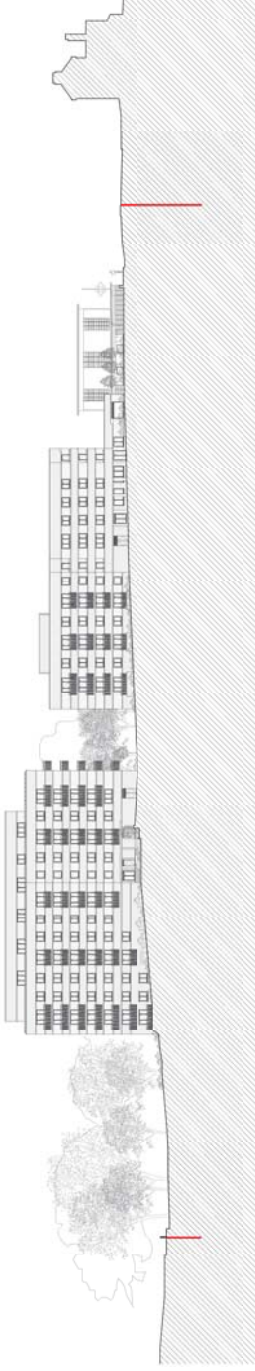
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t: +44 (0)20 7358 7353
e: uk@ml-architects.com

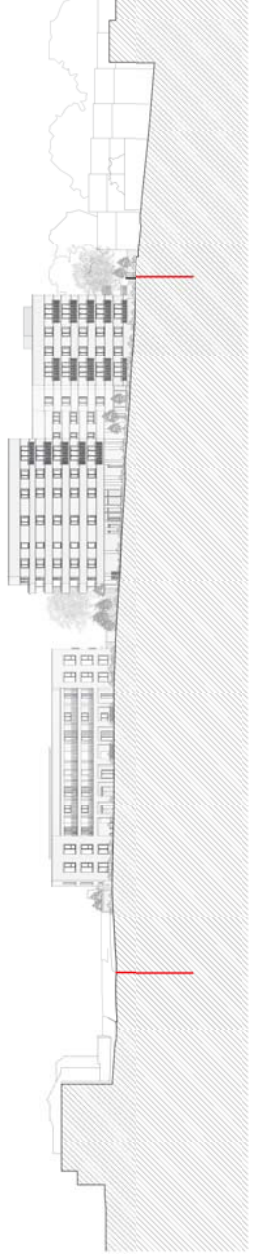
Client
CCL
Project
Arnos Grove

Title:
Proposed Site Elevations & Sections
Scale:
1:500 @ A1 / 1:1000 @ A3

MLUK-721-A-P-XX-1031



Proposed Site Elevation 3 - West



Proposed Site Elevation 4 - East

Tree Strategy



Tree Removal, Retention & Proposed Strategy

