

## PLANNING COMMITTEE

22<sup>nd</sup> June 2021

### REPORT OF:

Head of Planning

### Subject:

Member Update for Planning Committee

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### Update to Planning Committee

Ahead of Tuesday's Planning Committee meeting, there are a small number of additional items that you should be aware of and which will be of assistance to Members in your assessment of the proposals.

#### 1.0 Item 8: 20/01895/FUL – Bush Hill Park Bowls & Tennis Club, Abbey Road, Enfield, EN1 2QP

1.1 Representations objecting to the proposed development, have been received from the Bush Hill Park Conservation Area Study Group

1.2 The comments of the Group are as follows:

#### Comments of the Bush Hill Park Conservation Area Study group

2.1 On behalf of Bush Hill Park Conservation Area Study Group ("BHPCASG") I am writing following receipt of your consultation letter dated the 23rd April. Since the previous consultation letter (11th March) the only new information appearing on Enfield's web page relates to drawings; entered on 1st April. Many of our earlier comments are still relevant. Although this consultation appears to relate only to the new drawings, we have reiterated our earlier comments; where applicable. We have done so because this new consultation does not address all the points raised earlier.

2.2 *Preliminary Conclusion:*

- The new proposal is not supported.
- Acknowledging design improvements the proposal fails on the basis of massing, scope, site footprint and accommodation that does not reflect the neighbourhood in terms of density.
- The proposal neither improves nor enhances the conservation area.

Generally:

- 2.3 It remains regrettable that the current scheme under consideration departs so widely from the initial pre-application advice. Whilst that advice is no longer on Enfield's web page the position of the planning authority was quite clear, namely, that officers "considered that the delivery 4 units (i.e. semi-detached housing) in an arrangement that is commensurate with the locality would be more appropriate".
- 2.4 The latest pre-application advice (14th August 2020), unfortunately, is much less prescriptive and weakens Enfield's earlier direction. This has resulted in a proposal that BHPCASG considers to be substandard for the following reasons.
- It is assumed that the latest Pre Application Advice contained in Enfield's letter dated 14/8/20 reference 20/00801/PREHER is still relevant. The letter remains on the planning web page and is logged as 28/9/20. The following comments are in the order of the letter.

*Loss of tennis courts:*

- 2.5 There is still no robust evidence, in the public domain, to counter Enfield's PPS desire to retain the courts. If such a response has been received it should be shown on the web page.
- 2.6 Similarly, there is no evidence that Sport England has commented on the proposal. Enfield advised that the applicant should engage with the statutory body before submitting a planning application. Again, if it has been received it should be shown on the web page.
- 2.7 It may be that Enfield see themselves as the sole arbiter of such evidence (if it exists). However, it is a very relevant aspect to the application. Its omission has led to doubt in the minds of consultees and a fragmented consultation process.

*Proposed New Residential Housing:*

- 2.8 To repeat; the site location is suburban and residential. The Character Appraisal describes BHPCA as having "large domestic dwellings in well-spaced surroundings". This proposal is high density living conditions more akin to a city centre location. The density is inappropriate for its location.

- 2.9 BHPCASG understand housing needs in the Borough are focused around three and four bedroom houses with a garden. In other words family homes. This site is uniquely placed to meet that criteria.

*Design & Heritage Considerations:*

- 2.10 Enfield directs the applicant to concentrate on the predominately Victorian & Edwardian nature of the conservation area. Enfield's letter waxes loquaciously on appearance, layout, character and so on of the area. It goes on to say that "the overall scale, bulk and massing of the previously submitted 4 units would be considered more appropriate".
- 2.11 The applicant's response has been to produce a near photographic copy of adjacent properties for the street facing elevation. Then, to arrange the bulk of the building in the depth of the site, such that there is little left for amenity space or to meet the axiom of "large domestic dwellings in well-spaced surroundings".
- 2.12 Enfield advised that if their guidance were followed there was every chance that the development would make a positive architectural contribution. The applicant's response has been, in the face of stiff opposition to their initial proposal, to simply produce a facsimile of adjacent properties. The facsimile is veneer thin as it only pertains to the street facing elevation. The bulk of the building is in its depth; which is excessive.
- 2.13 In our previous consultation response BHPCASG commented on the rear elevation. The group is pleased to note the substantial change to this elevation. Gone are the large, glazed, box dormers; which is to be welcomed. The re-design has brought more modest (and in keeping with the area) hipped roof dormers. A significant improvement.

*Quality of Accommodation and Unit Mix:*

- 2.14 Enfield stated that at application stage there should be detailed internal layouts showing bedroom sizes etc., gross internal areas and storage space. Whilst the drawings show the layout they are not dimensioned neither are floor areas given.
- 2.15 Enfield also laid down its expectations for amenity space as "usable and high quality amenity space. As a minimum, officers will expect all family sized units to have amenity space in the form of gardens etc.". BHPCASG contend that the proposal does not meet that criterion.
- 2.16 BHPCASG notes that four bicycle racks scattered around the rear garden. They are four placed in each corner. They interfere with the amenity space. It is assumed they have been put there as an expediency to free up space in the front of the property. It is indicative of over-development such that storage facilities have to be broken up and distributed in the amenity space.

*Impact upon Neighbouring Amenity:*

- 2.17 Above all else BHPCASG is concerned about the depth of the two buildings. The drawings are not dimensioned but it can be seen from the ground floor plan that building's depth is some 33% beyond the rear building line of the adjacent neighbours. This is as a result of cramming too much accommodation on the site.
- 2.18 Enfield made the point that sense of privacy, avoidance of overshadowing and maintaining adequate daylight/sunlight are important issues. The overbearing massing fails to address these issues.
- 2.19 Enfield required the applicant to survey neighbouring properties and show the windows. This has not been done; it is therefore impossible to know whether Enfield's criteria of lines of sight has been met.

*Transport and Highway Considerations:*

- 2.20 BHPCASG notes, without comment, a transport assessment has been submitted.

*Sustainable Drainage etc.:*

- 2.21 BHPCASG has no comment.

*Energy/Sustainability:*

- 2.22 BHPCASG has no comment.

*Biodiversity & Landscaping:*

- 2.23 Enfield commented that the proposal must include high quality landscaping and boundary treatments to the front garden areas. To try and meet this direction the applicant has been forced to re-site the cycle racks around the small rear garden. This has created just enough space for a token front garden.
- 2.24 BHPCASG note the rubbish bins have now been placed, in open sight, along the proposed access road to the Club. However the massing and footprint of the development precludes a proper bin store; thus residents will have to gaze at up to 24 bins (8 flats x 1 rubbish+1 green + 1 food) in open view. There should be space for properly housed paladins to consolidate waste storage. The scattering of bins is cheap and shoddy and devalues the conservation area.
- 2.25 The postage sized green areas (in the front) are clutter free. This comes at the price of scattering the bicycle storage to four separate

positions and locating the wheelie bins in a very visible location. It is certainly not "high quality landscaping and boundary treatments". This is contrary to Enfield's direction given in their letter.

*CIL:*

2.26 BHPCASG has no comment.

*Section 106 etc.:*

2.27 BHPCASG has no comment.

Conclusion:

- 2.28 The elevations are acceptable. BHPCASG has already commented, in their previous consultation response, that the front elevation is simply a lazy copy of adjoining properties; presumably to avoid criticism. It is a pastiche.
- 2.29 The applicant has improved the design of rear elevation.
- 2.30 The proposed materials, in general terms are also acceptable. Timber window frames, matching roof tiles and brick types etc that harmonise with the immediate neighbours are welcomed.
- 2.31 Notwithstanding these improvements BHPCASG contends that the proposal fails to make a positive contribution to the built environment for the following, summarised, reasons;
- 2.32 There is simply too much development on too smaller a site. This is not a city centre, high density location. It is overdevelopment that shows itself in (1) the depth of the buildings, (2) the mean and cluttered amenity spaces both to the front and rear of the proposed properties and (3) fragmented storage facilities for bicycles and the scattering of rubbish bins along the access road.
- 2.33 The overbearing impact, given the massing of the proposal, on the immediate neighbours.
- 2.34 The applicant's departure from Enfield's pre-application advice along with the lack of response to key issues identified by the planning authority.
- 2.35 The complete absence of robust evidence (supported by Sport England) justifying the loss of the tennis courts.
- 2.36 The disingenuous adoption of photographs, in the Heritage Statement, that purport to justify a development of flats. The properties shown are

either outside the conservation area or constructed pre conservation status.

- 2.37 This is a conservation area and the bar is set at a higher level in terms of design, massing and the relationship to the wider conservation area. Had the applicant followed Enfield's original pre-application advice (four semi- detached properties) then an appropriately aligned proposal (to Enfield's advice) would have been supported a long time ago.
- 2.38 In summary BHPCASG continues to urge rejection of the application on the basis that it neither improves nor enhances the conservation area.