

LONDON BOROUGH OF ENFIELD		
PLANNING COMMITTEE		Date: 23 November 2021
Report of Head of Planning	Contact Officer(s): Andy Higham David Gittens Kate Perry	Ward: Grange
Ref: 20/02858/FUL		Category: Full Application
LOCATION: 100 Church Street, Enfield, EN2 6BQ		
PROPOSAL: Redevelopment of site involving demolition of buildings and erection of residential units with associated car parking, cycle parking and landscaping (Revised Drawings received July 2021)		
Applicant Name & Address: HPJ 11 Developments Ltd C/O Agent		Agent Name & Address: Mrs Mairead Flower Iceni Projects Da Vinci House 44 Saffron Hill London EC1N 8FH
RECOMMENDATION: To consider the confidential Part 2 report and: 1) In light of the additional information as set out in this report, to defer the application to enable the updates to be further assessed and balanced as part of an amended report for a future Planning Committee Or: 2) To agree the reasons for refusal following Planning Committee of 26 th October 2021		

1. Note for Members

- 1.1 At the meeting of Planning Committee on 26th October, members were minded to refuse planning permission but resolved to defer making a final decision to enable officers to prepare detailed reasons for refusal based on the concerns identified at the meeting. The reasons to be brought back to a future Planning Committee for consideration.
- 1.2 The resolution of Planning Committee identified three grounds of concern:
- i) the bulk, mass and height of the development relative to setting of heritage assets identifying the proximity to and effect on the setting of the New River, the Drill Hall on Old Park Ridings, the War Memorial on Chase Green and Genotin Terrace which did not outweigh the public benefits of the scheme.
 - ii) the residential mix and the number of 1 and 2-bedroom residential units as opposed to family units for which there is the greatest local need .
 - iii) the bulk , mass and height of the development relative to the impact on the character and appearance of the area
- 1.3 Draft Reasons for Refusal have been prepared for Members consideration and these are set out in a confidential Part 2 report to be circulated separately.

2. Recommendation

- 2.1 To consider the confidential Part 2 report and:
- 1) In light of the additional information as set out in this report, to defer the application to enable the updates to be further assessed and balanced as of an amended report for a future Planning Committee:
- part
- Or:
- 2) To agree the reasons for refusal following Planning Committee of 26th October 2021

3. Site and Surroundings

- 3.1 The site is located on the southern side of Church Street. It is currently occupied by an (up to) four storey vacant office building fronting on to Church Street. The building was previously occupied by Metaswitch who have re-located to new offices situated within Enfield Town. The site is located adjacent to St Pauls Church and Community Centre and Nos 2-6 Old Park Avenue to the west and the New River to the east. To the south of the site is Enfield Town Conservative Club and bowls green. Car parking is available to the rear of the existing building which is accessed via Old Park Ridings.
- 3.2 The site is located within the Enfield Town Conservation Area and there are a number of other identified heritage assets within the immediate vicinity of the site including Listed and Locally Listed buildings.

- 3.3 The site is located between Enfield Town (classified as a Major Centre) and Enfield Chase (classified as a Local Centre). The site falls within the Enfield Town Masterplan area and is identified for re-development.
- 3.4 The New River runs alongside the site, bordering it to the east and continuing to the north. This is designated as a site of Local Importance for Nature Conservation, a wildlife corridor and also forms part of the Green Chain corridor.
- 3.5 The site is well connected in terms of public transport and has a Public Transport Accessibility Level (PTAL) rating of 6a ('excellent'). The site is within walking distance of both Enfield Chase and Enfield Town railway stations and there are numerous bus routes along Church Street.

4.0 Proposal

- 4.1 The proposal is for the redevelopment of the site to provide 78 residential units (Class C3). The development would involve the demolition of the existing vacant office building and the erection of two residential blocks. The northern block, fronting Church Street, would comprise 30 units of accommodation over 5 storeys and would accommodate a mix of private and affordable housing. The southern block would comprise 48 private residential units over 6 storeys.
- 4.2 The architects have adopted what is described as a 'mansion block' typology with a focus on creating a high density, high quality flatted development. A feature of this typology is that they have central points of pedestrian access with internal corridors and circulation spaces leading to individual flats. Bay windows are employed to maintain a familiar sense of domesticity and character despite the overall scale and density of the buildings.
- 4.3 Three parking spaces for blue badge holders are proposed on site. 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 air quality and climate change by facilitating such measures as car free development where there is are excellent public transport links (in this case PTAL 6a, excellent).
- 4.4 140 long stay cycle parking spaces are proposed – 36 two-tier spaces are proposed at ground floor level in the southern block. In the northern block at basement level 96 two-tier spaces are proposed. At ground floor level in the northern block, 8 Sheffield stand spaces are proposed. Four short stay cycle parking spaces are proposed within the external parking/ courtyard (siting to be agreed by condition).
- 4.5 The scheme proposes the provision of 14.22% affordable housing (by habitable room). All the affordable units will be provided as London Affordable Rent (LAR). The proposed housing mix is set out below:

Total by Units

Units	Number	% of total
3b4p	4	5.1
2b4p	23	29.5
2b4p (Accessible)	1	1.3
2b3p	4	5.1
2b3p (Accessible)	8	10.3
1b2p	38	48.7

4.6 Broken down by tenure, the development will provide:

Private

Units	Number	% of total private
3b4p	0	0
2b4p	20	28
2b4p (Accessible)	1	1.4
2b3p	4	5.6
2b3p (Accessible)	8	11.3
1b2p	38	53.5

London Affordable Rent

Units	Number	% of total affordable
3b4p	4	57.1
2b4p	3	42.9
2b4p (Accessible)	0	0
2b3p	0	0
2b3p (Accessible)	0	0
1b2p	0	0

- 4.7 Each residential unit will have access to a private balcony or terrace, in addition to 172sqm of dedicated play space for children with further opportunities for informal play around the wider site.
- 4.8 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.
- 4.9 The application documents demonstrate how the scheme has evolved through the pre-application process, through to submission. The scheme was subject to pre-application discussion and engagement. Pre-application engagement included meetings and workshops with Council Officers, independent design review by Enfield Design Review Panel, 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. A Statement of Community Involvement (SCI) has been submitted as part of the application to demonstrate how the applicants have engaged with the local community.

5.0 Additional Information

5.1 Since the resolution of Planning Committee, the Applicant has responded to the concerns identified with the following offer to revise the current planning application:

- A 'without prejudice' offer of 2 x additional London Affordable Rent homes (1x2B3P and 1x2B4P) on ground and first floor in northern block, increasing the proposed level of affordable housing from 14.2% to 16.7% on a habitable room basis.

- A commitment to a detailed planning condition and S106 planning obligation to secure appropriate treatment of the river frontage, in terms of landscape design, boundary treatment, and long-term maintenance.

5.2 As new information, officers consider it important that Members are provided with all pertinent information. It is for Members to consider whether there is merit in the proposed amendment warranting further assessment in an additional report to Planning Committee.

6.0 Relevant Policy

National Planning Policy Framework 2021

6.1 The National Planning Policy Framework sets out at Para 11 a presumption in favour of sustainable development. For decision taking this means:

“(c) approving development proposals that accord with an up-to date development plan without delay; or

(d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date (8), granting permission unless:

(i) the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed (7); or

(ii) any adverse impacts of so doing would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole.

6.2 Footnote (8) referenced here advises “This includes, for applications involving the provision of housing, situations where the local planning authority cannot demonstrate a 5 year supply of deliverable housing sites (with the appropriate buffer, as set out in paragraph 74); or where the Housing Delivery Test indicates that the delivery of housing was substantially below (less than 75% of) the housing requirement over the previous 3 years.”

6.3 The Council’s recent housing delivery has been below our increasing housing targets. This has translated into the Council being required to prepare a Housing Action Plan in 2019 and more recently being placed in the “presumption in favour of sustainable development category” by the Government through its Housing Delivery Test.

6.4 The Housing Delivery Test (HDT) is an annual measurement of housing delivery introduced by the government through the National Planning Policy Framework (NPPF). It measures the performance of local authorities by comparing the completion of net additional homes in the previous three years to the housing targets adopted by local authorities for that period.

6.5 Local authorities that fail to meet 95% of their housing targets need to prepare a Housing Action Plan to assess the causes of under delivery and identify actions to increase delivery in future years. Local authorities failing to meet 85% of their housing targets are required to add 20% to their five-year supply of deliverable housing sites targets by moving forward that 20% from later stages of the Local Plan period. Local authorities failing to meet 75% of their housing targets in the preceding 3 years are placed in a category of “presumption in favour of sustainable development.

- 6.6 In 2018, Enfield met 85% of its housing targets delivering 2,003 homes against a target of 2,355 homes over the preceding three years (2015/16, 2016/17, 2017/18). In 2019 Enfield met 77% of the 2,394 homes target for the three-year period delivering 1,839 homes. In 2020 Enfield delivered 56% of the 2,328 homes target and we now fall into the “presumption in favour of sustainable development” category.
- 6.7 This is referred to as the “tilted balance” and the National Planning Policy Framework (NPPF) states that for decision-taking this means granting permission unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole – which also includes the Development Plan. Under the NPPF paragraph 11(d) the most important development plan policies for the application are deemed to be ‘out of date’. However, the fact that a policy is considered out of date does not mean it can be disregarded, but it means that less weight can be applied to it, and applications for new homes should be considered with more weight (tilted) by planning committee. The level of weight given is a matter of planning judgement and the statutory test continues to apply, that the decision should be, as section 38(6) of the Planning and Compulsory Purchase Act 2004 requires, in accordance with the development plan unless material considerations indicate otherwise.

The London Plan 2021

- 6.8 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:

- GG1 – Building Strong and Inclusive Communities
- GG2 – Making the Best Use of Land
- GG3 – Creating a Healthy City
- GG4 – Delivering the Homes Londoners Need
- 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
- D14 – Noise
- H4 – Delivering Affordable Housing
- H5 – Threshold Approach to Applications
- H6 – Affordable Housing Tenure
- H10 – Housing Size Mix
- HC1 – Heritage Conservation and Growth
- S4 – Play and Informal Recreation
- E6 – Locally Significant Industrial Sites
- HC1 – Heritage Conservation and Growth
- G1 – Green Infrastructure
- G5 – Urban Greening
- G6 – Biodiversity and Access to Nature
- G7 – Trees and Woodland
- SI1 – Improving Air Quality
- SI2 – Minimising Greenhouse Gas Emissions

- SI4 – Managing Heat Risk
- SI5 – Water Infrastructure
- SI7 – Reducing Waste and Supporting the Circular Economy
- SI12 – Flood Risk Management
- SI13 – Sustainable Drainage
- T1 – Strategic Approach to Transport
- T2 – Healthy Streets
- T3 – Transport Capacity, Connectivity and Safeguarding
- T4 – Assessing and Mitigating Transport Impacts
- T5 – Cycling
- T6 – Car Parking
- T6.1 – Residential Parking
- T7 – Deliveries, Servicing and Construction
- T9 – Funding Transport Infrastructure through Planning

Local Plan - Overview

- 6.9 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 and the London Plan, 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.

Core Strategy

- 6.10 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.

- CP2: Housing supply and locations for new homes
- CP3: Affordable housing
- CP4: Housing quality
- CP5: Housing types
- CP9: Supporting community cohesion
- CP13: Promoting economic prosperity
- CP16: Taking part in economic success and improving skills
- CP18: Delivering shopping provision across Enfield
- CP20: Sustainable energy use and energy infrastructure
- CP21: Delivering sustainable water supply, drainage and sewerage infrastructure
- CP22: Delivering sustainable waste management
- CP24: The road network
- CP25: Pedestrians and cyclists
- CP26: Public transport
- CP28: Managing flood risk through development
- CP30: Maintaining and improving the quality of the built and open environment
- CP31: Built and landscape heritage
- CP32: Pollution

CP36: Biodiversity
CP46: Infrastructure contributions

Development Management Document

- 6.11 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.
- 6.12 The following local plan Development Management Document policies are considered particularly relevant:

DMD1	Affordable Housing on Sites Capable of Providing 10 Units or more
DMD3	Providing a Mix of Different Sized Homes
DMD4	Loss of Existing Residential Units
DMD6	Residential Character
DMD8	General Standards for New Residential Development
DMD9	Amenity Space
DMD10	Distancing
DMD22	Loss of Employment Outside of Designated Areas
DMD37	Achieving High Quality Design-Led Development
DMD38	Design Process
DMD44	Preserving and Enhancing Heritage Assets
DMD45	Parking Standards
DMD47	New Roads, Access and Servicing
DMD48	Transport Assessments
DMD49	Sustainable Design and Construction Statements
DMD50	Environmental Assessment Methods
DMD51	Energy Efficiency Standards
DMD53	Low and Zero Carbon Technology
DMD54	Allowable Solutions
DMD55	Use of Roof Space / Vertical Surfaces
DMD56	Heating and Cooling
DMD57	Responsible Sourcing of Materials
DMD58	Water Efficiency
DMD59	Avoiding and Reducing Flood Risk
DMD60	Assessing Flood Risk
DMD61	Managing Surface Water
DMD65	Air Quality
DMD68	Noise
DMD69	Light Pollution
DMD70	Water Quality
DMD72	Open Space Provision
DMD73	Children's Play Space
DMD78	Nature Conservation
DMD79	Ecological Enhancements
DMD81	Landscaping

Other Material Considerations

National Planning Practice Guidance
Mayoral Supplementary Planning Guidance
LBE S106 SPD
Enfield Strategic Housing Market Assessment
Community Infrastructure Levy Regulations

Enfield Town Conservation Area Character Appraisal (2015)

Enfield Town Framework Masterplan (2018)

6.13 Site 17 – Former Metaswitch Premises

Key principles and land uses

- Should this prominent site come forward, it is appropriate for a mix of use including residential, offices and potentially commercial leisure.
- Land to the south and fronting Old Park Avenue is most appropriate for residential uses.
- Redevelopment of the site should not result in any loss of jobs in Enfield.

Form of development

- The Metaswitch site falls within the Enfield Town Conservation Area although the building itself makes only a neutral contribution to the character of the conservation area.
- The existing Metaswitch office building does, however, contribute positively to an office campus character.
- New development fronting Church Street should respect the scale of and views to key landmark churches either side of the site. Views to these churches play an important role in establishing the character of the conservation area.
- The scale of development on the Old Park Avenue frontage should respect existing dwellings but there will be an opportunity for a taller form of development in the south east corner of the site.
- Buildings should address the river front in a positive manner.

Access and movement

- The site's principal vehicular access will continue to be taken from Old Park Avenue.
- Improvements arising from the development of this site to the riverside path through Town Park would be welcome.

Public realm

- The existing trees are a major environmental asset and should be retained in any redevelopment. A TPO is protecting a Sycamore tree on Old Park Avenue.
- Access to the New River path should be maintained and where possible improved

Enfield Local Plan (Reg 18) 2021

6.14 Enfield Local Plan - Reg 18 Preferred Approach was approved for consultation on 9th June 2021. The Reg 18 document sets out the Council's preferred policy approach together with draft development proposals for several sites. It is Enfield's Emerging Local Plan.

6.15 The Local Plan remains the statutory development plan for Enfield until such stage as the replacement plan is adopted and as such applications should continue to be determined in accordance with the Local Plan, while noting that account needs to be taken of emerging policies and draft site proposals.

6.16 Key local emerging policies from the plan are listed below:

Policy DM SE2 – Sustainable design and construction
Policy DM SE4 – Reducing energy demand
Policy DM SE5 – Greenhouse gas emissions and low carbon energy supply
Policy DM SE7 – Climate change adaptation and managing heat risk
Policy DM SE8 – Managing flood risk
Policy DM SE10 – Sustainable drainage systems
Strategic Policy SPBG3 – Biodiversity net gain, rewilding and offsetting
Policy DM BG8 – Urban greening and biophilic principles
Policy DM DE1 – Delivering a well-designed, high-quality and resilient environment
Policy DM DE2 – Design process and design review panel
Policy DM DE7 – Creating liveable, inclusive and quality public realm
Policy DM DE10: Conserving and enhancing heritage assets
Policy DM DE11 – Landscape design
Policy DM DE13 – Housing standards and design
Policy DM H2 – Affordable housing
Policy DM H3 – Housing mix and type
Policy DM T2 – Making active travel the natural choice
Strategic Policy SP D1 – Securing contributions to mitigate the impact of development