

# LONDON BOROUGH OF ENFIELD

## PLANNING COMMITTEE

Date: 3<sup>rd</sup> February 2022

### Report of

Head of Planning  
- Vincent Lacovara

### Contact Officer:

Andy Higham  
Allison De Marco  
Lap Pan Chong

### Ward:

Enfield Lock

Ref: 21/03248/OUT

Category: Full Application (Minor)

**LOCATION:** Car Park Raynton Road Enfield EN3 6BP

**PROPOSAL:** Hybrid planning application (part detailed /part outline) for redevelopment of site involving erection of 5 x terraced dwellinghouses (up to three storeys) and associated works comprising:

Detailed planning application for construction of 5 x two storey terraced dwellinghouses with amenity spaces, car parking spaces, refuse and cycle stores, landscaping and associated works (Phase 1); and

Outline planning application (with matters relating to appearance reserved) for erection of 5 x extensions to the 2-storey terraced dwellinghouses contained within phase 1 including details of siting, access, scale, and landscaping (phases 2-6).

### Applicant Name & Address:

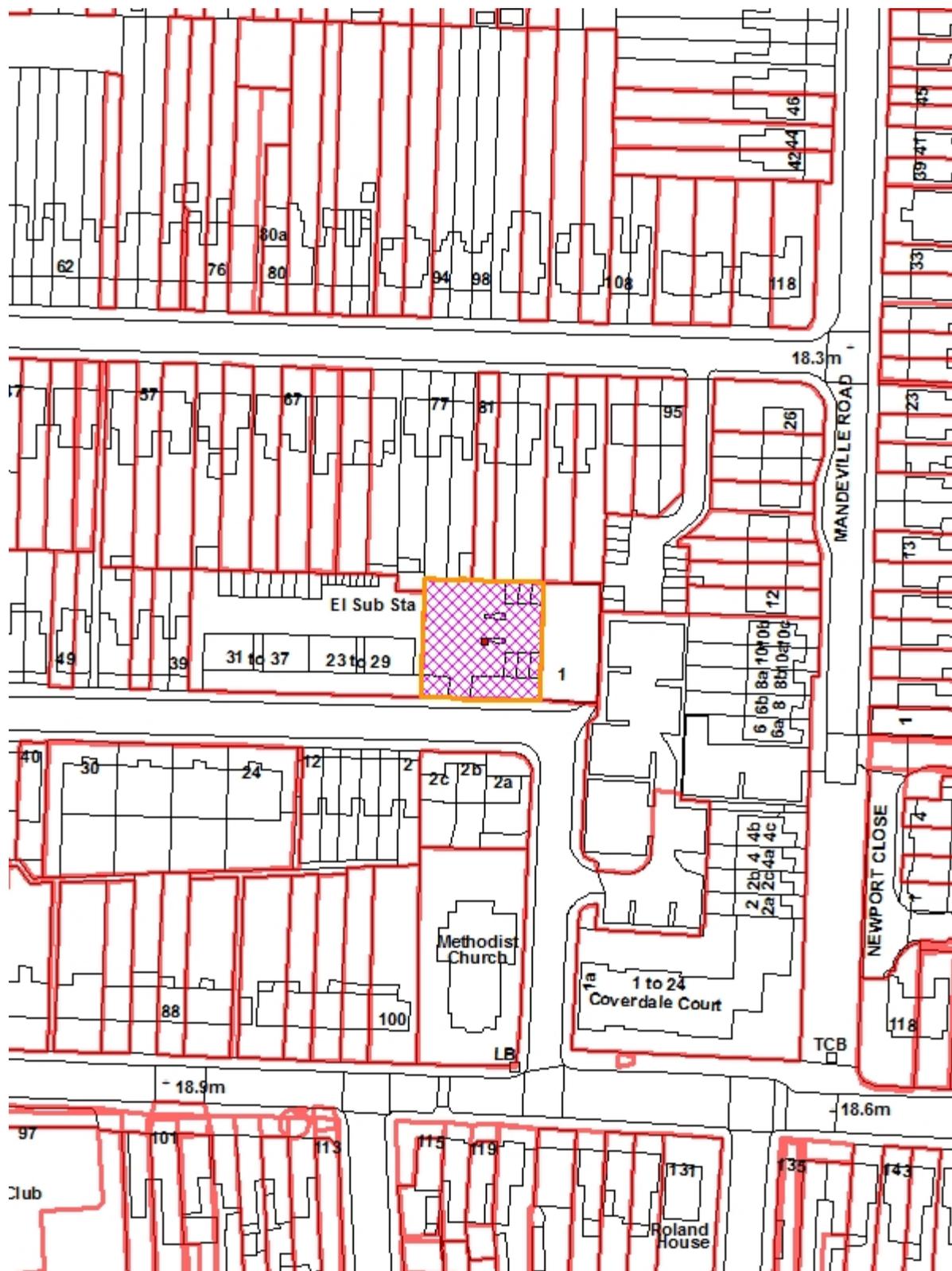
Naked House  
2 Bethune Road  
London  
N16 5BD

### Agent Name & Address:

Miss Nour Sinno  
HTA Design LLP  
78 Chamber Street  
London  
E1 8BL

### RECOMMENDATION:

1. That subject to the finalisation of a shadow S106 to secure the matters covered in this report and to be appended to the decision notice, the Head of Development Management/ the Planning Decisions Manager be authorised to GRANT planning permission subject to conditions.
2. That the Head of Development Management/Planning Decisions Manager be granted delegated authority to agree the final wording of the conditions to cover the matters in the Recommendation section of this report.



## **1. Note for Members**

- 1.1 This planning application is categorised as a “minor” planning application and would normally be determined under delegated authority, as set out in the Scheme of Delegation. However, the application is reported to the Planning Committee because the Council is the landowner. In accordance with the scheme of delegation, it is reported to the Planning Committee for determination.

## **2. Executive Summary**

- 2.1. This application forms part of the Enfield Custom Build Homes Scheme to deliver basic specification homes for local first time buyers at a market discount that can be self-finished. The sites in the schemes are Council-owned garages and car parking sites. As part of the pilot scheme, Naked House Community Builders, a not-for-profit developer, is working in partnership with the Council's Housing Development Team to deliver a total of 22 genuinely affordable homes across 3 sites: 2 sites on Raynton Road and 1 site on Meyer Green. That for the other site on Raynton Road is considered elsewhere on the Agenda.

There is a pressing need for housing, including affordable housing in the Borough, and Enfield has a challenging 10-year housing delivery target. The application proposes 5 genuinely affordable 1-bedroom homes the design of which enables the properties to be extended into 3-bedroom houses via roof extensions.

- 2.2. The application proposing the basic (“Naked”) building form is in ‘full’ (with all details submitted for approval at this stage) while the roof extensions to the two storey houses are in ‘outline’ (with appearance reserved for subsequent Reserved Matters approval).
- 2.3. The application proposes a high-quality residential house on existing brownfield land, which sits within a long-established predominantly residential area. The proposed development is considered to be a well-designed scheme, which is sympathetic to the character and appearance of the area and the amenities of neighbouring properties.
- 2.4. The primary public benefits of the scheme can be summarised as follows:
- Optimising the site – making effective use of a highly sustainable, highly accessible, brownfield site;
  - Housing – providing 5 genuinely affordable family homes, making a contribution to the Borough's affordable housing delivery
  - Social and economic benefits - providing jobs during construction
  - Landscape and biodiversity enhancements
  - Minimising greenhouse gas emissions and exceeding the minimum energy reduction target; and
  - An improvement in on-site sustainable urban drainage (water management)
- 2.5. Furthermore, it has been recognised that:
- By virtue of its size, location, and proximity, the development would not adversely affect the amenity of neighbouring residents.
  - The proposals would not cause any unacceptable harm to highway safety or the flow of traffic in the locality.

- 2.6. The development would be appropriate and broadly in accordance with the Development Plan (Adopted London Plan 2021, Core Strategy and Development Management policies) and relevant National Planning Policy Framework (NPPF) policies.

### **3. Recommendation / Conditions**

- 3.1. That subject to the finalisation of a shadow S106 to secure the matters covered in this report and to be appended to the decision notice, the Head of Development Management/ the Planning Decisions Manager be authorised to GRANT planning permission subject to conditions:

#### **3.2. Phase 1 – “Full” Element**

##### *Compliance conditions*

1. Time limit
2. Approved plans
3. Grampian condition (shadow s106 agreement)
4. No additional fenestration

##### *Design*

5. Sample materials
6. Detailed drawings
7. Details of refuse store
8. Security by design

##### *Traffic and Transportation*

9. Details of cycle store
10. Construction management plan

##### *Drainage*

11. Revised sustainable drainage strategy
12. Drainage Strategy verification report

##### *Trees and Biodiversity*

13. Arboricultural methods statement with tree protection plan
14. Details of landscape plan including boundary treatments
15. bat and bird box strategy

##### *Sustainability*

16. Energy compliance
17. Water efficiency

##### *Other Environmental condition*

18. Emissions from non-road mobile machinery
19. Land contamination verification report

20. No piling

3.3. Phases 2-6 – “Outline” Element

21. Time limit

22. Reserved Matter

3.4. Common Conditions – “Full” and “Outline” Elements

23. Restricted General Permitted Development

24. Restricted the use of flat roofs as balconies at all levels

3.5. That the Head of Development Management/Planning Decisions Manager be granted delegated authority to agree the final wording of the shadow S106 obligation and the conditions as set out in this report.

**4. Site & Surroundings**

4.1 The site is vacant comprising mainly hardstanding with some amenity grassland to the west and the southeast corner. It is located on the northern side of Raynton Road. There is a street tree in front of the site.

4.2 Based on the historical aerial photos, the site accommodated 6 terraced houses until the 1970s. It was then used as an informal car park until May 2021.

4.3 To the east, No 1 Raynton Road is a part 3, part 4 storey block of 7 flats under construction (ref: 20/00379/FUL).

4.4 To the west, Nos 23-37 Raynton Road is a 3-storey block of flats with amenity grassland wrapping around the front and eastern side elevations. The main communal amenity space is located at the rear of the building.

4.5 Directly north of the site are long rear gardens of houses which front Totteridge Road (Nos. 77-85). Opposite the site to the south, there is a row of 2-storey terraced houses.

4.6 The surrounding context is characterised by traditional rows of terraced and semi-detached houses with several blocks of flats ranging in height between 2 to 4 storeys. Most of the houses in the surrounding vicinity were constructed in the late Victorian period, with some later infill housing.

4.7 The site is within a predominantly residential area. There are shops and local amenities on Ordnance Road circa 110m (approximately 2 minutes' walk) away to the south, including a supermarket, several takeaways, and barbershops. There is a greater range of facilities on Hertford Road circa 510m (approximately 9 minutes' walk) away to the west, which includes a supermarket, library and places to eat.

4.8 The site has a Public Transport Accessibility Level (PTAL) of 2. There are several bus stops within walking distance on Ordnance Road, Hertford Road and Newbury Avenue. The nearest station (Enfield Lock) is circa 550m (approximately 6 minutes' walk) away. Turkey Street Rail station is also circa 1125m (approximately 14-minute walk) away.

4.9 The site is not within a Conservation Area or adjacent to any listed buildings. The site is located in Environment Agency Flood Zone 1 (low risk of flooding).

## **5. Proposal**

### Background

5.1 The proposed development is part of the Enfield Custom Build Homes Scheme which is a pilot funded by the GLA. The scheme intends to promote the development of smaller constrained garage / car parking sites to provide new homes for local first-time buyers at a market discount.

5.2 Naked House is a new housing model generally involving the phased construction of 'genuinely affordable' dwellings. The housing model is based on an initial build which comprises a smaller 'no-frills' dwelling (aka the 'naked state'). This model would allow for flexibility for further extensions as household needs change over time.

5.3 The model is intended to allow for:

- entry to the market by lower-income buyers by delivering 100% 'genuinely affordable' (intermediate) homes as per the Mayor's definition of 'genuinely affordable' (20% discount from market rates); and
- more complete communities by allowing households to age-in-place.

5.4 The Cabinet approved disposal of these sites in 2016 (KD4200) and 2019 (KD4613) as part of the Small Sites Housing Programme (KD3920). The Council and Naked House Community Builders (the Applicant), a not-for-profit developer, have signed a project agreement whereby Naked House would acquire the freehold of the sites subject to grant of planning permission and deliver the proposed development.

5.5 The proposal follows negotiation with the Council to initially bring forward 3 sites to deliver a total of 22 units. The two other sites are as follows:

- 21/03246/OUT - Garages 1 To 26 Ordnance Road Enfield EN3 6BN (Raynton Road West) – reported elsewhere on this Agenda.
- 21/03247/OUT - Garages Meyer Green Enfield EN1 4NG – To be reported to a future Planning Committee

5.6 The three planning applications are independent of each other and are all designed to reflect the particular characteristics of their context. The construction of these 3 sites is intended to commence by June 2022.

### Planning Application

5.7 This is a hybrid planning application seeking both full and outline planning permission. The full application seeks detailed permission for the erection of 5nos 2-storey terraced houses (1 bedroom 2 person), associated landscape, bin and bicycle stores. The existing crossover will be reinstated, and no off-street parking will be provided.

- 5.8 The outline application seeks permission for the proposed 1<sup>st</sup> floor roof extensions to the two-story houses, which would enable these homes to be extended to 3-storey (3-bedroom 6 person) houses as the household's need change.
- 5.9 The appearance of the proposed roof extensions would be subject to reserved matters applications before construction.

## **6. Consultation**

### Statutory and Non-Statutory Consultees

#### *Transportation*

- 6.1 No objection subject to conditions and S106 financial contribution for future parking restrictions.

#### *Sustainable Drainage*

- 6.2 No objection in principle but additional information is required on the Sustainable Drainage Strategy. This would be secured by a condition.

#### *Environmental Health*

- 6.3 No objection subject to conditions relating to air quality and land contamination.

#### *Urban Design*

- 6.4 The Urban Design Officer initially raised some concerns with the scheme and notably regarding the materiality. Revised plans and further clarifications have been submitted, and while some concerns remain, the Officer is satisfied on balance that the changes have positively influenced the scheme, and the appearance of the buildings can be secured by conditions.

#### *Design Review Panel*

- 6.5 During the pre-application stage, an independent Design Review Panel was held on 10th June 2021 to discuss design-related matters, such as massing and form, materiality, landscape, and boundary treatments.

- 6.6 The Panel were supportive of the overall scheme. Most suggestions from the Panel have been incorporated in the latest submitted scheme. Where the suggestions are not taken, sound justifications have been provided and are addressed in the report.

#### *Thames Water*

- 6.7 No objection subject to a condition

#### *Designing Out Crime Officer (Met Police)*

- 6.8 No objection subject to a condition

Public  
*Pre Application*

- 6.9 The Applicant undertook community consultation at the pre-application stage, including an online community meeting held on 24th June 2021. The Community Engagement report is attached as an appendix to the submitted Planning Statement.

*Planning Application*

- 6.10 Consultation letters were sent to 289 surrounding properties on 8<sup>th</sup> September 2021 and 10<sup>th</sup> November 2021.
- 6.11 Site notices were put up on 8<sup>th</sup> September 2021 and 10<sup>th</sup> November 2021.
- 6.12 Four objections to this application were received at both the first and second rounds of the consultation. A summary of the points of objections raised and officers' responses are as follows:

Summary of responses

- Lack of meaningful public consultation

Officers' response

As illustrated above, extensive public consultation has been undertaken which is beyond the minimum statutory requirements for 'minor' planning applications set out in Article 15 of the Development Management Procedure Order and the Council's Statement of Community Involvement.

The scheme has been revised several times, and has informed discussions with additional information provided in light of the concerns raised during the public consultation

Summary of responses

- The plot is too small and tight
- Inappropriate location for residential development in a cul de sac
- Overdevelopment

Officers' response

The matters raised are assessed in the 'Principle of Development' and 'Character and Design' sections of this report.

Summary of responses

- Lack of security measures for 89 Totteridge Road
- Loss of light to 75 and 87 Totteridge Road and 27 Raynton Road
- Loss of outlook from 27 Raynton Road
- Loss of amenity space to 27 Raynton Road
- Overlooking to 75 and 89 Totteridge Road
- No provision for refuse store for existing residents
- Noise pollution
- Air pollution

Officers' response

The matters raised are assessed in the 'Neighbouring Residential Amenities' section of this report.

Summary of responses

- Loss of parking spaces
- Parking pressure on Raynton Road and the surrounding roads
- Lack of turning space for large emergency vehicles
- Local and emergency vehicles struggle to access Raynton Road
- Increase in traffic and the safety risk to children
- No access to parking spaces for the existing elderly residents in need of community care

Officers' response

The matters raised are assessed in the 'Transport, Access and Parking' section of this report.

Summary of responses

- Devaluation of the properties
- Any consideration of selling off land forming a part of the block of flats must be offered to the leaseholders before any consideration to sell to some indiscriminate third party

Officers' response

These matters are not a material planning consideration. Nevertheless, legal advice has been sought.

The Council is an exempt landlord as defined under Section 58 of the Act (Exempt landlords and resident landlords). Whilst long leaseholders under certain circumstances may claim a right of first refusal under Part I of the Landlord and Tenant Act 1987, Part I does not apply "at a time when the interest of the landlord in the premises is held by an exempt landlord or a resident landlord": section 1(4).

Accordingly, the right of first refusal does not ensure to the benefit of the leaseholder because his landlord, the Council, is an exempt landlord for the purposes of Part I of the 1987 Act.

## 7. Relevant Planning History

Application Site

- 7.1 LBE/74/0027 -Redevelopment  
Granted 08.11.1974

1 Raynton Road (adjoining site to the east)

- 7.2 20/00379/FUL - Directly adjacent to the proposed site. Redevelopment of site and erection of part 3, part 4 storey building comprising 7no. self-contained flats (3no. 1-bed, 2no. 2-bed and 2no. 3-bed units) and associated works.  
Granted with conditions 02.07.2020

## **8. Relevant Planning Policies**

- 8.1 Section 70(2) of the Town and Country Planning Act 1990 requires the Committee have regard to the provisions 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.

### National Planning Policy Framework 2021

- 8.2 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.

- 8.3 The NPPF recognises 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.

- 8.4 In relation to achieving appropriate densities Paragraph 124 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.

- 8.5 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.

Housing Delivery Test / Presumption in Favour of Sustainable Development:

- 8.6 The National Planning Policy Framework sets out at Paragraph 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.
- 8.7 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."
- 8.8 The Council's recent housing delivery has been below our housing targets. This has translated into the Council being required to prepare a Housing Action Plan in 2019 and being placed in the "presumption in favour of sustainable development category" by the Government through its Housing Delivery Test. This status has recently been confirmed for the period 2022-23.
- 8.9 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.
- 8.10 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.
- 8.11 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.
- 8.12 This is referred to as the "tilted balance" and the NPPF states (see paragraph 8.6 above) 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.

- 8.13 Under the NPPF paragraph 11(d) where the most important development plan policies for the application are deemed to be 'out of date', planning permission should be granted. That does not mean out of date policy can be disregarded, but it means that less weight can be applied to it, and applications for new homes should be given weight when by Planning Committee when undertaken their assessment taking account of the “tilted” balance that applies. 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

- 8.14 The London Plan with the Enfield’s Local plan forms the Development Plan for this application. It 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
- D11 – Safety, Security and Resilience to Emergency
- D12 – Fire Safety
- D14 – Noise
- H4 – Delivering Affordable Housing
- H6 – Affordable Housing Tenure
- H10 – Housing Size Mix
- G6 – Biodiversity and Access to Nature
- G7 – Trees and Woodland
- SI1 – Improving Air Quality
- SI2 – Minimising Greenhouse Gas Emissions
- SI5 – Water Infrastructure
- SI12 – Flood Risk Management
- SI13 – Sustainable Drainage
- T5 – Cycling
- T6 – Car Parking
- T6.1 – Residential Parking
- T7 – Deliveries, Servicing and Construction

#### Local Plan - Overview

- 8.15 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, they form the statutory development plan for the Borough. Enfield's Local Plan sets out planning policies to steer

development where they align with the NPPF and the London Plan 2021. 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

8.16 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
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

8.17 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.

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

DMD3	Providing a Mix of Different Sized Homes
DMD6	Residential Character
DMD8	General Standards for New Residential Development
DMD9	Amenity Space
DMD10	Distancing
DMD37	Achieving High Quality Design-Led Development
DMD38	Design Process
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
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
DMD78	Nature Conservation
DMD79	Ecological Enhancements
DMD81	Landscaping

8.19 Other Material Considerations

National Planning Practice Guidance  
 Mayor of London Housing SPG (Adopted March 2016)  
 LBE S106 SPD 2016  
 Enfield Local Housing Needs Assessment 2020  
 Community Infrastructure Levy Regulations  
 Self-build and Custom Housebuilding Act  
 Technical housing standards – nationally described space standard 2015  
 Blue and Green Strategy June 2021

Enfield Local Plan (Reg 18) 2021

8.20 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.

8.21 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.

Other Material Considerations

8.22 National Planning Policy Guidance

**9. Analysis**

9.1. This report sets out the analysis of the issues that arise from the proposal when assessed against the development plan and the National Planning Policy Framework

9.2. This application has been subject to extensive negotiation to address the concerns raised by officers and local residents through the consultation process.

9.3. The main considerations of the development are the following:

- Principle of Development
- Housing Need and Mix
- Character and Design

- Neighbouring Residential Amenities
- Quality of Accommodation
- Flood Risk
- Landscape, Biodiversity and Landscaping
- Traffic, Access and Parking
- Carbon Emissions and Energy
- Fire Safety
- Air Pollution and Land Contamination
- Secure by Design

### Principle of Development

#### *Optimising brownfield site for residential development*

- 9.4. Making more efficient use of land is presently of significance due to the identified need for housing as a consequence of the Housing Delivery Test, which has triggered the "tilted balance" and the presumption in favour of approving sustainable development (NPPF). 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.
- 9.5. Enfield Housing's Trajectory Report (2019) shows that during the preceding 7 years, the Borough had delivered a total of 3,710 homes which equates to around 530 homes per annum. Enfield's 2019 Housing Action Plan recognises that the construction of more high-quality homes is a clear priority, with only 51% of approvals over the preceding 3-years actually being implemented. A Local Housing Need Assessment (LHNA) was undertaken in 2020 and identifies an annual housing need of 1,744 homes across the Borough based on a cap of 40% above the London Plan annual target of 1,246 homes, in line with the Government's standard methodology.
- 9.6. The Council's Local Plan Issues & Options (Regulation 18) document (2021) acknowledges the sheer scale of the growth challenge for the Council and the focus for development in locations with good access to local infrastructure and public transport. The Council's Housing and Growth Strategy 2020-2030 aims to deliver the London Plan targets for the Borough.
- 9.7. Enfield is a celebrated green borough with close to 40% of the land currently designated as 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. These land designations underpin the need to optimise development on brownfield land. Paragraph 1.2.5 of the London Plan (2021) 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'.*
- 9.8. The application site is a brownfield site within a predominately residential area comprising disused car park and associated hardstanding with an element of amenity grassland, which while not unsubstantial, provides little in terms of visual setting or indeed usable amenity provision.
- 9.9. The site area of 0.059 hectares means the site is categorised as a 'small site' as defined in Policy H2 of the London Plan (2021). Naked House, a small and medium-sized not-for-profit community developer, would deliver the proposed development.

The future occupiers are allowed to customise their homes. This proposed development would help achieve the annual housing targets of 353 units on small sites set out in the London Plan (2021). Hence, the proposed development is supported by Policy H2 of the London Plan (2021).

#### *Loss of vacant car park*

- 9.10. The site has been vacant since the informal car park was closed in May 2020. There is no policy requirement for the retention or re-provision of a car park and no objection is raised to the loss of this area. The parking pressure issue is assessed below in the 'Traffic, Access, Parking' section.

#### *Conclusion on Principle of Development*

- 9.11. The proposed development would optimise a vacant 'small site' comprising mainly hardstanding in a predominately residential street to deliver 5 genuinely affordable houses with some custom-build elements. In principle, this is supported by the NPPF (2021), London Plan Policies and Core Strategy (2010).
- 9.12. The acceptability of the scheme must be qualified by other relevant material considerations, including the housing mix, design, quality of accommodation, transport/parking, trees and biodiversity, fire, pollution, security and the impact of the development upon neighbouring residential units.

#### Housing Need and Mix

- 9.13. The current London Plan sets a target for the provision of 52,287 new homes each year. In addition, the London Plan 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. 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.
- 9.14. 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 ambitious adopted London Plan targets.
- 9.15. Core Policy 5 outlines that the Council will seek a range of housing types in the intermediate sector and that the mix of intermediate housing sizes will be determined on a site by site basis. It should also be noted that the evidence base to support Core Policy 5 dates from 2008. The Local Housing Needs Assessment 2020, which informs the emerging draft Local Plan for Enfield, is a more up to date evidence base. Hence, it carries weight in the assessment.
- 9.16. The Local Housing Needs Assessment (LNHA) 2020 identifies that 1,407 affordable units would be needed per year. Among them, 696 (49%) units should be intermediate tenures products to help low-middle income households, who cannot afford to buy a property on the open market achieve their homeownership aspirations.
- 9.17. The LNHA (2020) has informed emerging Policy H3 of the Draft Local Plan for Enfield (2021). The table below is an extract from Policy H3, which outlines priority types for

different-sized units across different tenure. The focus of affordable ownership provision (shared equity/intermediate products) should be on one and two-bedroom units, as the majority of households who live in intermediate (shared ownership) housing are households without children based on the census data. It is noted that the Draft Reg 18 Local Plan was published in June 2021 and is at an early stage of preparation. Although this draft policy in the emerging plan carries limited weight now, it is used to illustrate the most up-to-date housing need in Enfield.

	Studio/bedsit	One-bedroom	Two-bedrooms	Three-bedrooms	Four-bedrooms or more
Social/affordable rented	Low priority	Medium priority	High priority	High priority	Low priority
Intermediate	Low priority	High priority	High priority	Medium priority	Low priority
Market	Low priority	Low priority	Medium priority	High priority	High priority

Source: Table 8.4: Dwelling size priorities, Enfield Local Plan (Reg 18) 2021

### *Affordability*

- 9.18. This planning application is categorised as a “minor” planning application (i.e. no more than 10 homes). No affordable housing provision is required under paragraph 64 of the NPPF (2021). The proposed affordable housing provision is considered a significant planning gain.
- 9.19. Paragraph 4.6.8 of London Plan (2021) states that “*Intermediate ownership products such as London Shared Ownership and Discounted Market Sale (where they meet the definition of affordable housing), should be affordable to households on incomes of up to £90,000. Further information on the income caps and how they are applied can be found in the Annual Monitoring Report. The caps will be reviewed and updated where necessary in the Annual Monitoring Report.*”
- 9.20. Paragraph 3.87 of the GLA London Plan Annual Monitoring Report 16 2018/19, published March 2021 (AMR) states that “*for dwellings to be considered affordable, annual housing costs, including mortgage payments (assuming reasonable interest rates and deposit requirements<sup>13</sup>), rent and service charge, should be no greater than 40 per cent of a household’s net income.*”
- 9.21. Paragraph 4.6.9 of the London Plan (2021) states 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. Boroughs should seek to ensure that intermediate provision provides for households with a range of incomes below the upper limit.*”
- 9.22. Naked House is a not-for-profit community developer which has been set up to provide intermediate housing for sale to people whose household income is too high to qualify for social housing but is insufficient to buy on the open market. Naked House intends to sell homes for no more than the development cost.
- 9.23. Whilst Naked House homes will have fewer fixtures and fittings, all the units will have full services (heating, lighting, plumbing etc.), a working kitchen and bathroom and a full external envelope. They will have new build warranties and will be mortgageable

with a high street mortgage provider. In addition, Naked House has installed features that allow homes to be easily adapted to become larger homes, such as double height living space and structural lintels. These additions and future flexibility provide the inherent value that compensates for any lack of fixtures and fittings.

- 9.24. The proposed homes would be sold at a price with at least a 20% discount to the open market value. There would also be provision for re-sales to carry forward the initial discount to future eligible buyers.
- 9.25. The Affordable Housing Statement shows the indicative open market values and sale prices of the new homes. It demonstrates that under reasonable financial assumptions including deposit requirement, mortgage multiplier, interest rate and mortgage repayment period, the proposed homes would be affordable for households with a range of incomes below the upper limit as per paragraph 3.88 of the latest London Plan Annual Monitoring Report (i.e. annual gross household incomes of £56,200 or less)
- 9.26. Furthermore, the applicant has also undertaken additional stress tests to demonstrate that under a range of scenarios, the annual housing costs, including mortgage and service charge, would be less than 40 per cent of net household income of the target income group as per the latest AMR, which would comply with paragraph 4.6.9 of the London Plan (2021).
- 9.27. The shadow S106 obligations would ensure the affordability of the homes would be maintained in perpetuity, and the homes would be allocated in accordance with the Enfield Intermediate Housing Policy (2020). Therefore, it is considered that the proposed homes would meet the criteria as genuinely affordable as defined in London Plan (2021) and the proposed development would exceed the policy requirements for affordable housing provision in minor planning applications.

#### *Housing mix*

- 9.28. The proposed houses are designed to grow and expand over time at a low cost to the occupier. This is the differential from other intermediate products which while they may be accessible to first-time buyers at the lower end of the market, do not always provide opportunities for expansion or extension to family-sized accommodation without having to move. This future flexibility is key to this affordable product and the proposed integrated ability to create family homes over time (up to 3-bedroom 6-person homes suitable for larger families) is a further consideration in its favour. This can be achieved by:
- The ability to add internal space by infilling the double-height volume with an internal floor.
  - The inclusion of structural supports for the future roof extensions (outline element of this application) and roof build-ups which can be removed and replaced on top of the roof extensions to reduce material costs.
- 9.29. The proposed housing mix is therefore considered acceptable and would meet the need for Intermediate affordable dwellings in Enfield as identified in the latest Local Housing Needs Assessment (LNHA) 2020 and Policy 5 of Core Strategy (2010).

### *Custom build homes*

- 9.30. The Self-build and Custom Housebuilding Act 2015 placed a requirement on local authorities to grant planning permission to enough suitable serviced plots of land to meet the demand for self-build and custom housebuilding in their area. This includes using their own land (if available and suitable) for self-build and custom housebuilding and working with local partners and third sector groups to custom build affordable housing.
- 9.31. Naked House works closely with the Council's Housing Development Team and the proposed development is part of the Council's Custom Build Home Programme. The Naked House development model seeks to deliver "shell" or "naked" homes which are fully constructed with basic kitchens and bathrooms. The internal finishes will be incomplete, reducing the build costs and allowing purchasers to save money by completing these themselves, either over time as funds allow, or through the use of their own "sweat equity," i.e. saving on labour costs by completing the internal finishes themselves.

### *Conclusion on housing need and mix*

- 9.32. The proposed development helps the Council meet its duty under the Self-build and Custom Housebuilding Act. In addition, the proposed development would deliver 5 genuinely affordable homes with the potential to deliver affordable family accommodation through future extension. The proposed housing typology and mix is therefore considered acceptable. These considerations should weigh heavily in favour of the development in the planning balance.

### Character and Design

- 9.33. Chapter 7 of the National Planning Policy Framework (NPPF) 2021 states that the Government attaches great importance to the design of the built environment, with good design being a key aspect of sustainable development. While Council's should not be too prescriptive in terms of architectural style, in order to achieve high-quality outcomes, regard must be had to the overall scale, density, massing, height, landscape, layout, materials and access of any new development, particularly in relation to neighbouring buildings and the character of the local area more generally.
- 9.34. Policy DMD 6 (Residential Character) of the Development Management Document requires that the scale and form of development are appropriate to the existing pattern of development or setting regarding the character typologies. This policy is consistent with the objectives of Policies D3 and D4 of the London Plan (2021).

### *Layout, Height and Massing*

- 9.35. The surrounding context is characterised by traditional rows of terraced and semi-detached houses with several blocks of flats ranging in height between two to four storeys.
- 9.36. The imposition of a terrace typology, by configuration, is such that its linear form would successfully integrate into the surroundings with a footprint, plot size and general rhythm that is broadly replicated along Raynton Road. The proposed five terraced houses would align with the apartment block at 1 Raynton Road on the east with generous front gardens. Overall, the new terrace houses would respect the established

building lines along Raynton Road and will successfully reactivate this vacant space to the benefit of the surroundings.

- 9.4. In the Naked state, the proposed two-storey houses with flat roofs would be lower than the adjoining two-storey residential block with gabled roof at 23-37 Raynton Road, and the part three, part four-storey flat-roofed residential block at 1 Raynton Road. In the fully developed state, the proposed roof extensions would align with the top of the third storey of the adjoining apartment block at 1 Raynton Road and form a gradual east-west transition in height to the two-storey block at 23-37 Raynton Road.



Figure 1 Site photo

#### *Detailing and materials*

- 9.5. Following the advice from the Design Review Panel and Officers, the applicant has made positive changes to enhance the appearance of the proposed houses, such as extruded canopies above the front entrances and distinctive blockwork at the bottom of the facades. The detailing of the buildings would broadly reflect some common features in the area. Details of the boundary treatments would be secured by a condition to ensure the forecourts are more enclosed.
- 9.6. The Applicant has also replaced the grey concrete block with pigmented concrete masonry block which has a better textual appearance. Additional evidence and samples of the proposed masonry block were submitted to address the Urban Design concerns, notably the robustness of the proposed materials and contextuality.
- 9.7. The proposed masonry block would have a water retardant that protects it against expansion and contraction caused by moisture and signs of efflorescence. The terracotta-coloured block would also less readily show signs of discolouration from pollution and weathering. The blocks can also be painted with a protective coating to protect the material from weathering while retaining its breathability. The robustness of the proposed masonry has been demonstrated by the other award-winning housing schemes in London.

9.8. Given the proposed colour and palette of materials, the proposed houses would inevitably appear more modern on Raynton Road. However, the terrace typology would reflect the prevalent character in the area and within this context, the architectural difference would serve to express the Naked House ideology without dominating the street scene when viewed in conjunction with the 3/4 storey apartment block at 1 Raynton Road. Furthermore, due to its warmth, the terracotta colour would not necessarily conflict with the local character of buff brick with terracotta roofs prevalent in the local area. In addition, the vertical bonding mix use of contrasting colours of masonry blocks and mortar would help further add texture and variation to the façade of the proposed homes.



Figure 2: Indicative façade

9.9. Furthermore, the proposed masonry block is a cost-effective, low carbon construction method to deliver affordable and highly sustainable homes (See also the Energy and Carbon Emission section).

*Conclusion on Character and Design*

9.10. While of modern design, the NPPF is clear in its mandate that Local Planning Authorities do not impose architectural styles or particular tastes on development. LPAs should advocate high-quality design and reinforce local distinctiveness. It is considered that material samples and detailed drawings of the buildings and boundary treatments can be adequately secured by conditions to ensure a satisfactory appearance and appropriate integration into the street scene.

9.11. The proposed terrace typology would maintain the continuity in the established building line, consistency in the scale of the surrounding development and gradual transition in height and massing from East to West along Raynton Road. Although the proposed

masonry blocks would be different from the buff colour buildings in the locale, it is not considered that such a departure is unwelcome due to the strong design and a clear design solution to provide cost effective, low carbon and genuinely affordable dwellings. On balance, this is consistent with the provisions of Policy CP30 of the Core Strategy, Policies DMD6, 8 and DMD37 of the Development Management Document, Policies D3 and D4 of the London Plan (2021) and the NPPF (2021).

### Neighbouring Residential Amenity

#### *Daylight, sunlight and overshadowing*

- 9.12. 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.
- 9.13. Concerns have been raised during the consultation process from neighbouring properties, notably No. 75 and 87 Totteridge Road and No. 27 Raynton Road, regarding the impact of the proposed development on daylight and sunlight available to surrounding properties.
- 9.14. A 'Daylight & Sunlight' report has been submitted as part of the application. Neighbouring properties were identified as relevant for daylight and sunlight assessment based on proximity to the proposed development. The submitted report has been completed by daylight/sunlight specialists with reference to the Building Research Establishment (BRE) publication (2011), "Site Layout Planning for Daylight and Sunlight. A Guide to Good Practice", and local planning policy.
- 9.15. According to the report, the study confirmed that daylight to most of the primary windows of the neighbouring buildings would satisfy BRE Guide default target criteria except the single bedrooms of Nos. 23 and 27 Raynton Road with the east facing flank windows.
- 9.16. With regard to No.27 Raynton Road (a first floor flat), although the retained vertical skyline components (VSC) value of the east-facing flank window is 24%, it is marginally below the default BRE Guide target level of 27%, and the retained No-Sky Line (NSL) value would meet the default BRE Guide target criteria. Hence, the daylight to this single bedroom would be acceptable.
- 9.17. With regard to No.23 Raynton Road (a ground floor flat), it is noted that both the retained VSC and NSL values of the east-facing bedroom window do not meet the default BRE Guide target criteria. However, the BRE Guide is clear that alternative target criteria can be set in cases where an existing building has windows that are close to the site boundary.
- 9.18. It is not typical for a habitable room to rely on flank windows as the primary source of daylight on linear residential streets. The west-facing flank windows on the other end of this residential block face a blank flank wall of the adjoining two-storey houses (i.e. No.39 Raynton Road), which is set substantially forward from the west-facing flank windows of this residential block (see Figure 4 below). The retained level of daylight

enjoyed by No.23 Raynton Road's bedroom would not be materially different from that would be expected from other flank windows. Considering the site context and the satisfactory level of daylight to No.23 Raynton Road's other habitable rooms, the reduction in daylight to the bedroom enjoyed by the east-facing flank window is considered acceptable on balance taking account the benefits of delivering this residential scheme .



Figure 3: West-facing flank windows on the other end of the residential block (Nos. 23 – 37).

- 9.19. Furthermore, the proposed development has been designed to minimise the impact on the existing flank windows while delivering 5 genuinely affordable dwellings. The front walls of the proposed houses will be set back from the existing residential block. Also, the southwest corner of Unit 1 immediately adjacent to these existing flank windows will be chamfered at first-floor level to maintain a separation distance of 2.8m - 5m between the proposed flank wall and these existing flank windows. In addition, the proposed roof extensions will be sited to the north of these windows.

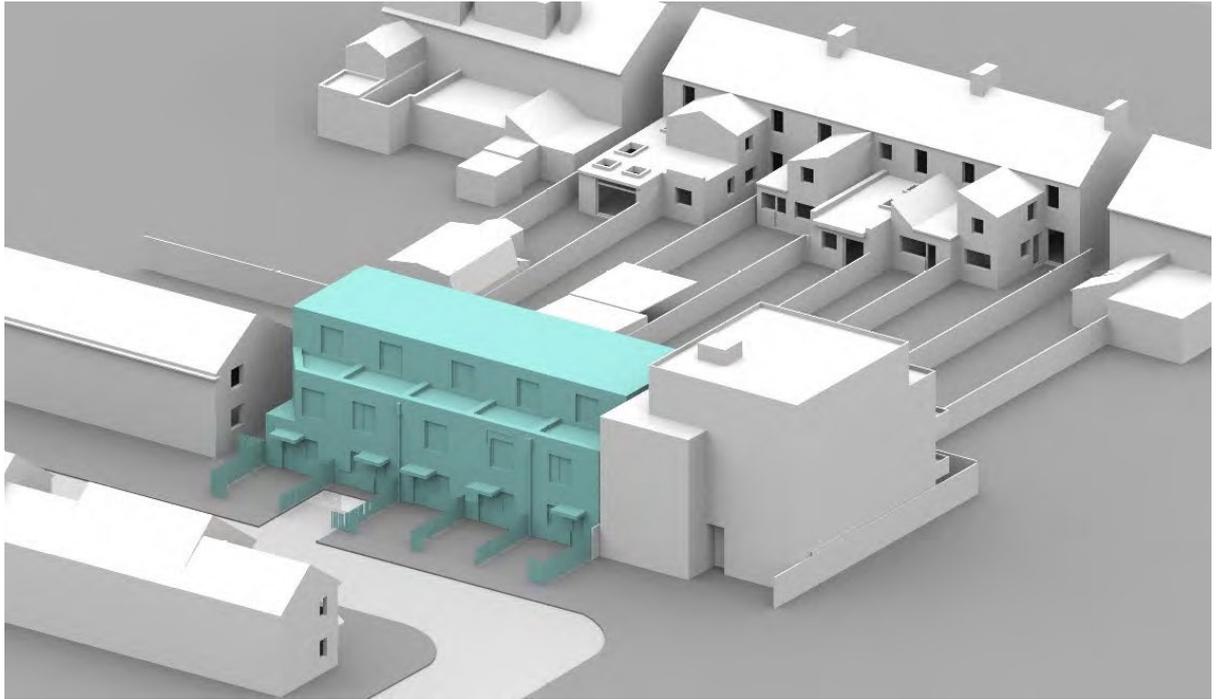


Figure 4 - 3D View – Proposed Scheme

- 9.20. Considering the above, it is therefore considered that on balance the reduction in daylight is considered acceptable for flank wall windows in this context.
- 9.21. In addition, sunlight to neighbouring buildings would fully satisfy BRE's criteria. Overshadowing to the neighbouring gardens would also remain BRE compliant.
- 9.22. Overall, it is considered that the proposed scheme has been designed to respond to BRE's criteria while delivering the quantum of genuinely affordable housing, the relevant policy within Enfield's Local Plan and The London Plan. On balance, it would not have an unreasonable impact on neighbouring residential occupiers in terms of loss of daylight, sunlight and overshadowing.

#### *Privacy*

- 9.23. The proposed development would not have any flank windows at upper floor levels on the western flank elevation. The rear wall of the proposed houses would also be set back from the residential block at No. 1 Raynton Road. A condition would be attached to ensure no additional fenestration on the side elevations.
- 9.24. Concerns have been raised during the consultation process from neighbouring properties, notably Nos. 75 and 89 Totteridge Road, regarding overlooking from the proposed development.
- 9.25. The adjoining Nos. 79 - 85 Totteridge Road benefit from deep rear gardens. The distance between the rear walls of these two-storey properties and the proposed houses at the first-floor level will be approximately 31m, which would exceed the minimum separation distance of 25m recommended in Policy DMD10 of the Development Management Document (2014). Furthermore, No. 89 Totteridge Road is located further to the north-east of the site. Therefore, any views from the proposed houses to their rear windows and immediate amenity space would be oblique.

- 9.26. Considering the above, it is considered that the proposed development would not result in any unreasonable overlooking to the adjoining properties.

*Loss of communal amenity grassland*

- 9.27. A strip of land (approximately 110m<sup>2</sup>) along the western boundary of Nos 23-37 Raynton Road would be incorporated into a curtilage of one of the proposed houses. This strip of land comprises low-quality amenity grassland and a refuse store for the existing residents associated with Nos 23-37 Raynton Road. The site has been visited on a number of occasions and no active leisure use in the area was observed. A communal amenity space of approximately 580m<sup>2</sup> would remain for the existing residents.
- 9.28. Furthermore, the Council's Place Improvement Team, who manages the residential block at Nos 23-37 Raynton Road, would relocate the refuse store to an accessible location within the rear curtilage of the residential block. This relocation would not require planning permission.
- 9.29. It is acknowledged that the loss of Nos. 23-37's Raynton Road's communal amenity grassland is not ideal. However, given the low amenity value of the communal grassland and the ample remaining communal amenity space and significant benefit of the affordable housing benefit, it is considered that the impact on the living condition of the existing residents at Nos. 23-37's Raynton Road would not be significant to the level that would warrant a reason for refusal, and the impact is acceptable on balance.
- 9.30. In addition, Naked House is obliged to deliver 22 affordable homes across the three constrained sites in Enfield under the GLA funding requirements. The development of this house is critical in achieving the necessary quantum to deliver the whole scheme.

*Noise and disturbance*

- 9.31. The proposed five terraced houses are sited on an established residential street. The site layout would be broadly similar to the other residential properties in the area. Hence the comings and goings to the proposed houses would not be materially different from any other houses. The Environmental Health Officer has confirmed no negative noise impact would arise from the development. Therefore, it is considered that the proposed development would not cause significant harm to the living conditions of adjacent occupiers through additional noise or disturbance.

*Rear access*

- 9.32. It is noted that there is a disused garage at the rear of 79 Totteridge Road adjoining the application site, which has been stopped up.

*Conclusion on Neighbouring Residential Amenities*

- 9.33. Having regard to the above, the proposal would not cause any detrimental impact upon the amenities of any neighbouring dwelling in terms of noise, disturbance, daylight, sunlight, outlook, privacy or overlooking and loss of communal amenity grassland or access. It would be in accordance with Policies D3, D4, D6 and D14 of the London Plan (2021), CP 4 of the Enfield Core Strategy (2010) and Policies DMD 8, 10, 37, and 68 of the Enfield Development Management Document (2014).

## Quality of Accommodation

### *Unit and Bedroom Size, Storage and Floor to Ceiling Heights*

- 9.34. Policy D6 of the London Plan (2021) sets out housing quality and design standards that housing developments must take into account to ensure they provide adequate and functional spaces. The proposed residential units will exceed the minimum required floor space standards for a 1b2p unit in the 'Naked' state and '3b6p' in the 'Developed State'. In addition, all single and double bedrooms comply with the minimum required space standards (7.5 sqm for single bedrooms and 11.5 sqm for double bedrooms).
- 9.35. Although a section has not been submitted, the submitted elevations demonstrate that more than 75% of the total gross floor internal area of the proposed houses would achieve a minimum floor to ceiling height of 2.5m required by the London Plan (2021).
- 9.36. It is noted that the proposed houses would not provide specified built-in storage areas. However, Naked House aims at providing future occupiers with the flexibility to customise the internal layout of their homes. The overall GIA of all the proposed houses would considerably exceed the minimum GIA standards in both the 'Naked' and 'Developed' states. Hence, it is considered that the lack of specified built-in storage areas would not result in cramped living conditions for the future residents in this instance.

### *Light, Outlook and Layout*

- 9.37. All the proposed houses are dual aspect, with the habitable rooms benefiting from at least one rear or front window. The submitted Daylight and Sunlight Assessment has also demonstrated that the internal daylight and sunlight of all the habitable rooms would meet the BRE guidelines. Therefore, the proposed houses would provide a satisfactory level of outlook and natural light to the future occupiers.

### *Privacy*

- 9.38. The proposed houses benefit from generous front gardens as sufficient defensible space, which would provide a satisfactory sense of privacy to the future occupiers.

### *Amenity Space and Play Area*

- 9.39. Each proposed house will benefit from a large rear garden of approximately 37sqm<sup>1</sup>. Hence, adequate, accessible and functional amenity spaces would be provided for the proposed houses, which would comply with DMD Policy 9.
- 9.40. It is noted that gates at a height of 1.1m are proposed at the end of each rear garden to facilitate onward fire escape from the properties. However, the proposed low fencing would raise security and privacy concerns, and there can be other alternative fire safety measures (see also Fire Safety). A condition has been attached to secure future details of the boundary treatments of the rear gardens. A condition would also be attached to
-

restrict the General Permitted Development Rights to safeguard the amount of private outdoor amenities of the future residents.

- 9.41. The private gardens would also serve as doorstep playspace for the under 5's in accordance with the Play and Informal Recreation SPG (2016). Albany Park lies within 400m to the south of the site and has several playing fields, formalised playspace. Furthermore, the Albany Park Leisure Centre, would provide playspace for the 5- 11 year olds and for 12+ year olds. The proposal therefore would comply with Policy S4 of the London Plan (2021).

#### Flood Risk and Drainage

- 9.42. Policy SI 13 of the London Plan (2021) requires development proposals to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible. There should also be a preference for green over grey features, in line with the specified drainage hierarchy. Policy DMD 61 states developments should seek to achieve Greenfield runoff rates for 1 in 1 year and 1 in 100 year (plus climate change) year events and must maximise the use of Suds, including at least one 'at source' SuDS measure resulting in a net improvement in water quantity or quality discharging to sewer in-line with any SuDS guidance or requirements.
- 9.43. Flooding is not a known risk on this site. Classed as Flood Risk 1, the site is at low risk of flooding.
- 9.44. The existing site mainly comprises impermeable surfaces with some amenity grassland. A preliminary SuDs strategy has been submitted with the application. The Council's SuDs team has requested more extensive use of source control SuDs measures across the site together with details of the proposed SuDS features and a management plan for future maintenance. The requested information would be secured by way of condition in accordance with Policies SI 12, SI 13 of the London Plan (2021), Policy CP 28 of the Enfield Core Strategy (2010) and Policies DMD 59, DMD 61 and DMD 63 of the Development Management Document (2014).

#### Landscaping, Biodiversity and Landscape

- 9.45. Policy G7 of the London Plan (2021) and Policy DMD 80 of the Development Management Document (2014) state that any development involving the loss of or harm to protected trees or trees of significant amenity or biodiversity value will be refused.
- 9.46. An Arboricultural Impact Assessment (AIA) has been provided in accordance with BS5837:2012. All the trees, including a street tree in proximity, will be retained. Tree protection measures during the construction phase, such as no-dig methodology for the new proposed footpath, are proposed. Furthermore, during this application, the car parking spaces in the forecourts and the associated concrete paving have been omitted, which has reduced the impact on the street tree. It is therefore considered that the proposed works are unlikely to have an adverse impact upon the long-term health of retained trees subject to a satisfactory Tree Protection Plan and Arboricultural Method Statement, which would be secured by way of a condition.
- 9.47. A Preliminary Ecological Appraisal was submitted with an ecological desk study and a walkover survey. The application site is located in a build-up residential area significantly away from nature conservation sites. The ecological values of the habitats

are considered low as it comprises hardstanding with some amenity grassland and scattered trees. No protected species have been identified at the site. All the existing trees would also be retained, as discussed above. With the installation of bird and bat boxes, the local biodiversity will be enhanced. This will be secured via a condition.

#### Traffic, Access, Parking

- 9.48. The site has a Public Transport Accessibility Level (PTAL) of 2. There are several bus stops within walking distance on Ordnance Road, Hertford Road and Newbury Avenue. The nearest station (Enfield Lock) is circa 550m (approximately 6 minutes' walk) away. Turkey Street Rail station is also circa 1125m (approximately 14-minute walk) away.
- 9.49. Raynton Road is a cul-de-sac that is accessible by vehicles from Ordnance Road, with pedestrian footpaths to Ordnance Road and Totteridge Road.
- 9.50. The site is not located within a Controlled Parking Zone (CPZ).

#### *Trip generation*

- 9.51. The proposal is for 5 dwellings in a well-established residential area. It would not result in any material changes in levels of service on footways and bus services, nor on the local highway network.

#### *Parking*

- 9.52. The site was previously used as informal parking for up to 12 cars and was closed in May 2021. Based on the information provided by the Housing Development Department, these spaces were not tied to any tenancy or lease agreements.
- 9.53. The Policy T6(L) of the London Plan (2021) states:  
*Where sites are redeveloped, parking provision should reflect the current approach and not be re-provided at previous levels where this exceeds the standards set out in this policy.*
- 9.54. The Transport Assessment estimates that the proposed development in the Naked State (i.e. 5 x 1-bedroom, 2-person unit) would potentially generate demand for 2 cars based on the census data. The potential demand for parking can rise to 4 cars if the houses are extended to a 3-bedroom unit in the fully developed state in the future. It is also acknowledged that there may be an overspill demand for 3 parking spaces from the adjoining new residential development at 1 Raynton Road (ref: 20/00379/FUL).
- 9.55. The applicant first undertook two parking surveys in December 2021 and two additional parking surveys in June 2021 after the informal car park closed in May 2021. It is acknowledged that Raynton Road is heavily parked. However, the latest parking surveys have shown no material change in the number of cars parked in unrestricted areas within the survey area after the informal car park was closed in May 2021.
- 9.56. Also, based on the obtained parking enforcement statistics, no significant increase in the issue of penalty charge notice on Raynton Road has been observed. This

suggests that vehicles can be broadly accommodated on Raynton Road without causing a significant level of complaints or violation of traffic rules.

- 9.57. Nevertheless, the issue has been discussed internally across different departments, including the Transport and Traffic, Housing Development, Place Improvement, Communal Services and Resident Relationship. A joint visit was also undertaken in December 2021.
- 9.58. The initial proposal involves 4 off-street parking spaces for the new houses. However this was not considered appropriate because the *off-street* parking spaces would be exclusively used by the future occupiers and would need new crossovers to make them fully functional, resulting in a loss of 3 on-street parking spaces. Hence, it is considered by officers that priority should be given to retaining and gaining on-street parking spaces for public use.
- 9.59. Following the officers' comments, the applicant omitted the proposed crossovers and proposed reinstating the existing crossover. Although no off-street parking spaces are provided, the proposed arrangement would mean a net gain of an on-street car parking space. Hence, 4 on-street parking spaces would be retained and available for use which would meet the potential parking demand from the proposed development and ensure on-street parking would not be compromised. This car parking arrangement would also comply with the maximum parking standards set out in the London Plan (2021).
- 9.60. Furthermore, the number of parking spaces has been increased from 3 to 6 within the Council's land in the Raynton Road West site, which a separate planning application on the agenda relates to (Ref: 21/03246/OUT). These new car parking spaces would only be 2 mins away from the subject site and would be for the existing housing estate residents helping to reduce parking pressure on Raynton Road by absorbing the vehicles currently taking up on-street parking bays.
- 9.61. Thirdly, the applicant has agreed on a financial contribution towards parking restrictions to improve access, should it be required, due to the increase in on-street parking pressures resulting from the development. A shadow S106 agreement would secure the financial contribution.

#### *Cycle parking*

- 9.62. Two bicycle parking spaces would be provided in the respective forecourts of each unit. The bicycle provision is considered adequate and accessible. Therefore, a condition has been attached to request details of the bicycle stores to ensure they are sheltered, secured, and provided prior to the first occupation in accordance with DMD Policy 45, Policy T6.1 of The London Plan (2021).

#### *Servicing and Refuse*

- 9.63. Each house will have its refuse store for kerbside collection. The proposed houses will be serviced as per the other residential units along Raynton Road. The proposed location, size and type of bins would be in line with ENV08/162.
- 9.64. It is noted that Cleansing have commented that on occasion refuse vehicles have had difficulties accessing Raynton Road when it is heavily parked. As mentioned above, a financial contribution is made towards parking restrictions to improve access, should

it be required, due to the increase in on-street parking pressures resulting from the development.

#### *Conclusion on Traffic, Access and Parking*

- 9.65. It is acknowledged that the existing car occupancy level on Raynton Road is high. Officers have closely monitored the situation and will continue to do so as part of the S106 obligation. Re-provision of car parking spaces from the former informal car park would be contrary to the London Plan Policy T6(L) and overall Transportation have no objection to the proposed development.
- 9.66. As discussed in the Principle of Development and Housing Need and Mix sections, the provision of genuinely affordable housing on brownfield land is strongly supported. With the proposed net gain in on-street parking by reinstating the existing crossover, and a financial contribution for parking restrictions, it is considered that the proposed parking arrangement would be acceptable on balance, and the proposed development would not result in conditions prejudicial to the safety and free flow of traffic in the surrounding area.
- 9.67. Having regard to the above, on balance, the proposal would comply with Policies T6.1 of the London Plan (2021), Policies CP22 and CP25 of the Enfield Core Strategy (2010) and Policies DMD45 and DMD47 of the Enfield Development Management Document (2014).

#### Carbon emissions and energy

- 9.68. Enfield Core Strategy Policy CP4 sets a strategic objective to achieve the highest standard of sustainable design and construction throughout the Borough. Policy DMD51 requires all developments to demonstrate how the proposal minimises energy-related CO<sub>2</sub> emissions. For new development, a 35%<sup>2</sup> CO<sub>2</sub> reduction over Part L of Building Regulations (2013) is encouraged to achieve the highest sustainable design and construction standards unless it is demonstrated that the target reduction is not technically feasible and economically viable in accordance with Policies DMD 50 and 51 (Energy efficiency standards). Policy DMD 53 also echoes that the provision and use of on-site renewable energy generation and low and zero-carbon technologies are encouraged.
- 9.69. With regards to operational carbon, the Energy Statement demonstrates that the proposed development would achieve a total carbon emissions savings of 2.44 tonnes of CO<sub>2</sub> emissions, 46% beyond the Part L of Building Regulation baseline by improving the insulation of the building fabric, use of heat pump for hot water consumption and direct electric heating. The heat pumps will be stored in the forecourts, and technical specification has been provided. The resultant carbon emissions savings exceed the policy requirements for minor planning applications. A condition has also been attached to ensure compliance by securing the final Energy Performance Certificate and Display Energy Certificate after practical completion of the works.
- 9.70. With regards to embodied carbon, there is no policy requirement for whole life carbon assessment for minor applications. Nevertheless, the Design and Access Statement

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<sup>2</sup> This is equivalent to 40% improvement on 2010 Building Regulations.

illustrates that the proposed masonry block has an embodied carbon of 56 kg CO<sub>2</sub>e/m<sup>2</sup>, which is close to timber, a widely perceived low embodied carbon material (49.5 kg CO<sub>2</sub>e/m<sup>2</sup>).

- 9.71. Policy SI5 of the London Plan (2021) requires that development be designed so that mains water consumption would meet a target of 105 litres or less per head per day, excluding an allowance of 5 litres per head for external water use. A condition therefore has been attached to ensure compliance.

#### Fire Safety

- 9.72. A Fire Strategy has been submitted, which provides clarification on the means of escape. Despite the open-plan layouts on the ground floor, the proposed gardens will have a length greater than the height of the buildings. Hence, these gardens would provide a safe place free from danger from fire when occupiers escape from the houses in the Naked State in accordance with the Building Regulations.
- 9.73. Any future extensions are expected to meet the Building Regulation in force at the time when they extend the roof extensions by way of approval from a relevant Building Control body.
- 9.74. It is proposed to have a rear gate with a height of 1.1m at the furthest end of each rear garden to facilitate safe egress from the rooms of the upper floors. However, the low fences and rear gates would raise security and privacy concerns. As a result, a condition is recommended which will seek improved and more secure boundary treatment while ensuring safe emergency egress is available.
- 9.75. Having regard to the above, it is considered that the fire safety arrangements are acceptable.

#### Air Pollution and Land Contamination

- 9.76. The Environmental Health Officer has confirmed that the proposed development would not result in air pollution and land contamination subject to conditions including dust and emissions control measures during the construction and demolition stage in the Construction Management Plan, restrictions on the emissions from all non-road mobile machinery during demolition and construction and a contamination verification report demonstrating the completion of the works set out in the submitted Contamination Report prior to the occupation.
- 9.77. The proposed development is located within 15 metres of a strategic sewer. Thames Water requested a piling method statement to protect the underground sewerage utility. A condition has therefore been attached.

#### Secure by Design

- 9.78. During the design process, a Secured by Design meeting was held with the Designing Out Crime Officer at Met Police, and feedback was integrated into the proposed design. The Met Police has confirmed no objection to the application. A condition has been attached to ensure the proposed houses attain 'Secured by Design' certification in accordance with Policy D11 of the London Plan (2021) and Policy DMD 37 of the Development Management Document (2014)

## Community Infrastructure Levy (CIL)

### *Mayoral CIL*

- 9.79. The Mayoral CIL is collected by the Council on behalf of the Mayor of London. The amount that is sought for the scheme is calculated on the net increase of gross internal floor area multiplied by an Outer London weighting (increased to £60 per sqm as of 1st April 2019).

### *Enfield CIL*

- 9.80. The Council introduced its own CIL on 1st April 2016. Enfield has identified three residential charging zones, and the site falls within the lower rate charging zone (£40/sqm).
- 9.81. Both CIL charging rates are presented prior to indexing. The proposed development would be CIL liable as it would create new dwellings. For the detailed application, The additional gross internal floor area of 317.5 sqm in the Naked State. Given the proposed development involves genuinely affordable housing, it may be eligible for CIL relief.

## Shadow S106 Heads of Terms

- 9.82. The table below outlines the Heads of Terms of financial and non-financial contributions to be secured within a shadow S106 Agreement

<b>Heads of Term</b>	<b>Description</b>	<b>Sum</b>	<b>Trigger</b>
Affordable Housing	To ensure the affordability is maintained in perpetuity as per paragraphs 4.6.8 and 4.6.9 of the London Plan (2021), the units would be allocated according to Enfield Intermediate Housing Policy.	£0	Ongoing compliance clause
Architects Retention clause	As per paragraph 3.4.12 of the London Plan (2021)	£0	Ongoing compliance clause
Transport and Highways	To introduce parking restrictions on Raynton Road	£3,000	Prior to the commencement of above ground works
S106 monitoring cost	At least 5% of the value of financial contributions		

- 9.83. The total residential floorspace proposed is less than 1,000m<sup>2</sup>. Hence, no other financial contribution would be required in accordance with the Enfield's Section 106 SPD (2016).

## **10. Public Sector Equality Duty**

- 10.1 Under the Public Sector Equalities Duty, an equalities impact assessment has been undertaken. It is considered the proposal would not disadvantage people who share one of the different nine protected characteristics as defined by the Equality Act 2010 compared to those who do not have those characteristics.

## **11. Conclusion**

- 11.1 The starting point for the determination of any planning application is the development plan. Paragraph 11(d) of the NPPF states that planning permission should be granted unless "the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed".
- 11.2 Members will be aware of the need to deliver more housing, including affordable housing in order to meet housing delivery targets. This proposed development would deliver 5 affordable homes, which would help meet the pressing need for affordable housing within the Borough, and Enfield has an extremely challenging 10-year housing delivery target. In this context, the provision of 5 affordable homes weighs heavily in favour of the development. These homes would also allow future residents to adapt their homes as household needs change over time and meet the demand for custom-build housing in Enfield as required by the Self-build and Custom Housebuilding Act 2015.
- 11.3 It is considered the application proposes a high-quality residential development on existing underutilised, highly sustainable brownfield land consistent with the objectives of the adopted planning policy. The applicant has engaged with the LPA in undertaking extensive pre-application advice inclusive of the development being presented to the Enfield Design Review Panel. The pre-application process involved the applicant considering design options to determine the most appropriate forms of development, and the scheme proposed has followed a design-led approach to site optimisation, as per London Plan Policy D3.
- 11.4 With new development comes change and some disruption. This design led proposal has sought to minimise the impact on the surrounding properties. Whilst there will be change, it is considered that the proposal would not be detrimental to the amenity of neighbouring residents.
- 11.5 In addition, as well as being energy efficient and sustainable, care has been given to ensure that the proposal would not harm the trees and biodiversity enhancement would be secured.
- 11.6 While parking pressure is high on Raynton Road, mitigation measures and financial contribution for parking restrictions are secured, which would ensure there is no adverse effect on the free flow and safety of traffic or highway safety.
- 11.7 Overall and taking account of the presumption in favour and the weight to be given to development which provides new affordable homes, it is concluded that the development for reasons set-out within this report, is acceptable and broadly accords with the policies of the Development plan where they are material to the development and other relevant material planning considerations including emerging policy. Subject to the appropriate mitigations as set out within the recommended condition

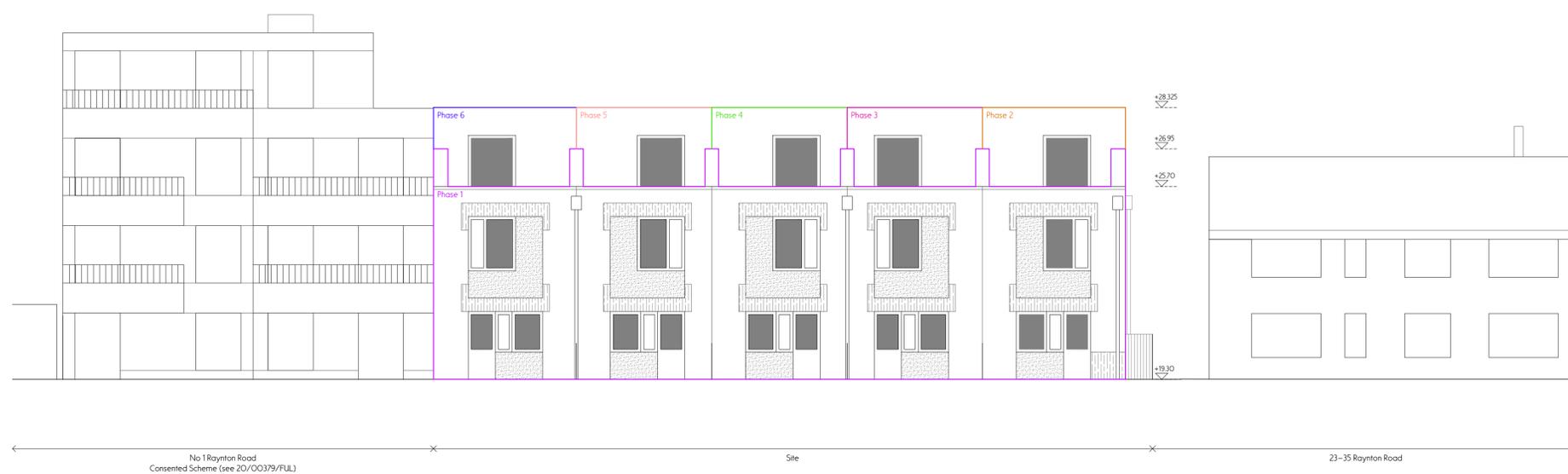
schedule, and within the shadow Section 106 Agreement, the application is recommended for approval.

Revision	Date	Description
-	13.08.21	For Planning
Rev A	05.11.21	For Planning
Rev B	12.01.22	For Planning

- Notes
-  Glazing
  -  Area of decorative masonry
  -  Area of recessed masonry with structural lintel to accommodate future adaptation
- Phase 1  
 Phase 2  
 Phase 3  
 Phase 4  
 Phase 5  
 Phase 6



1 Raynton Road East  
 D310 Front Elevation



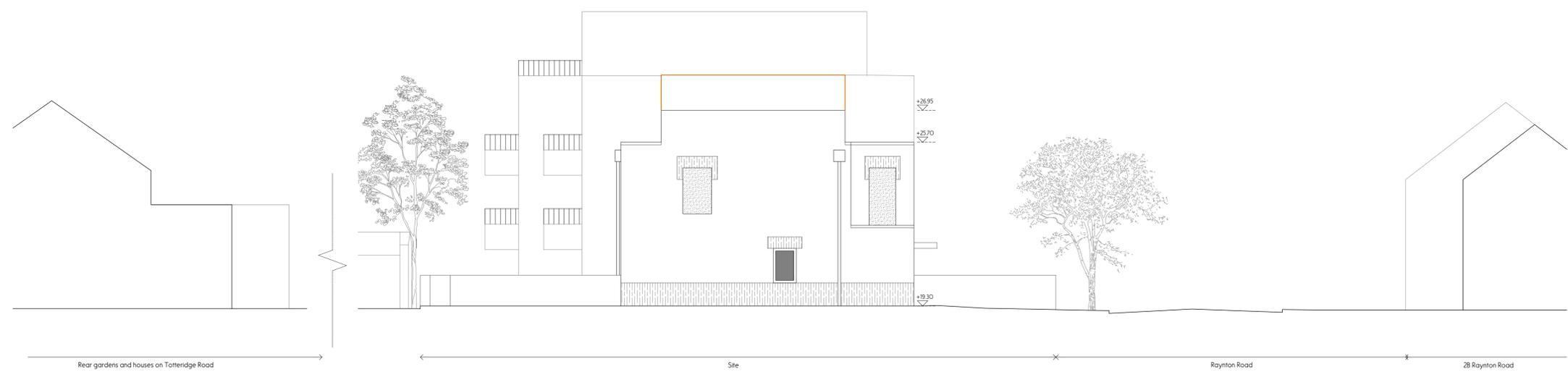
2 Raynton Road East  
 D310 Rear Elevation

Drawn	Checked	Scale
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- Notes
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1 Raynton Road East  
 D311 West Elevation

Drawn	Checked	Scale
AG	JL	1:100 @ A1 1:200 @ A3



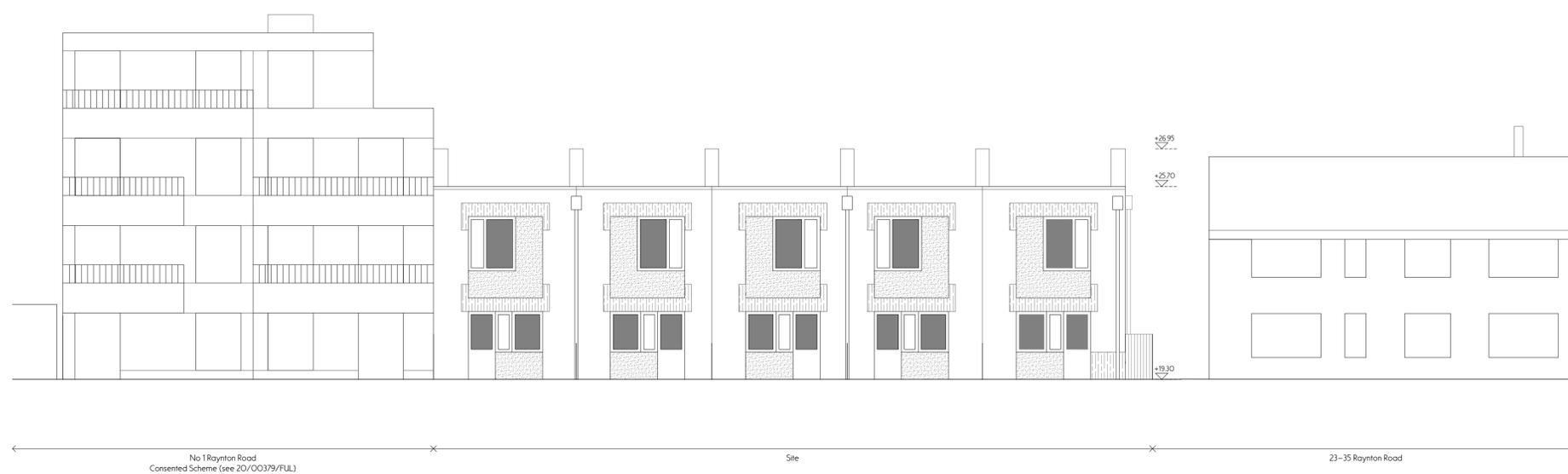
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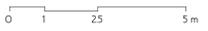


1 Raynton Road East  
 3.10 Front Elevation



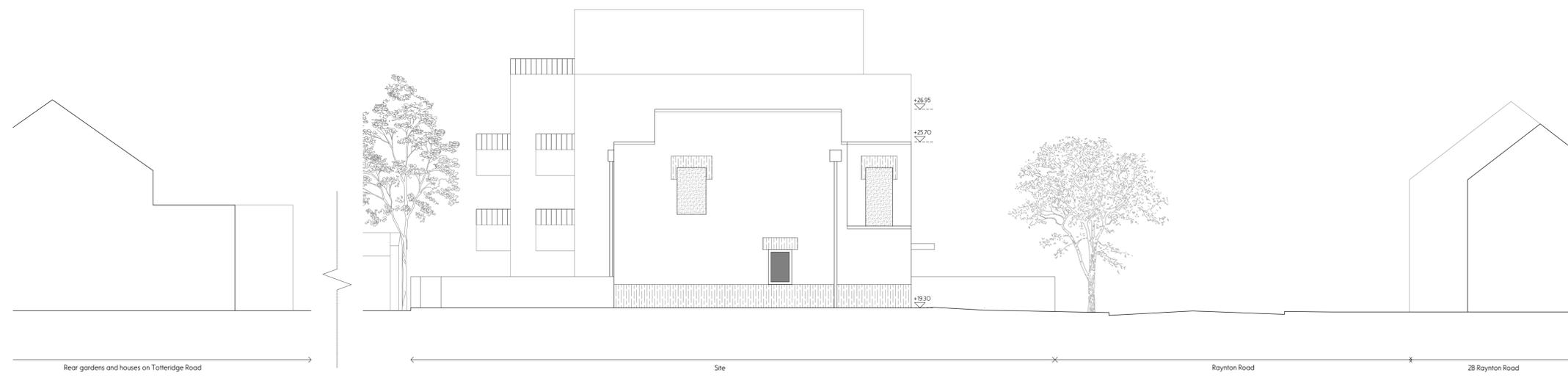
2 Raynton Road East  
 3.10 Rear Elevation

Drawn	Checked	Scale
RS	JL	1:100 @ A1 1:200 @ A3



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1 Raynton Road East  
 3.11 West Elevation

Drawn	Checked	Scale
AG	JL	1:100 @ A1 1:200 @ A3



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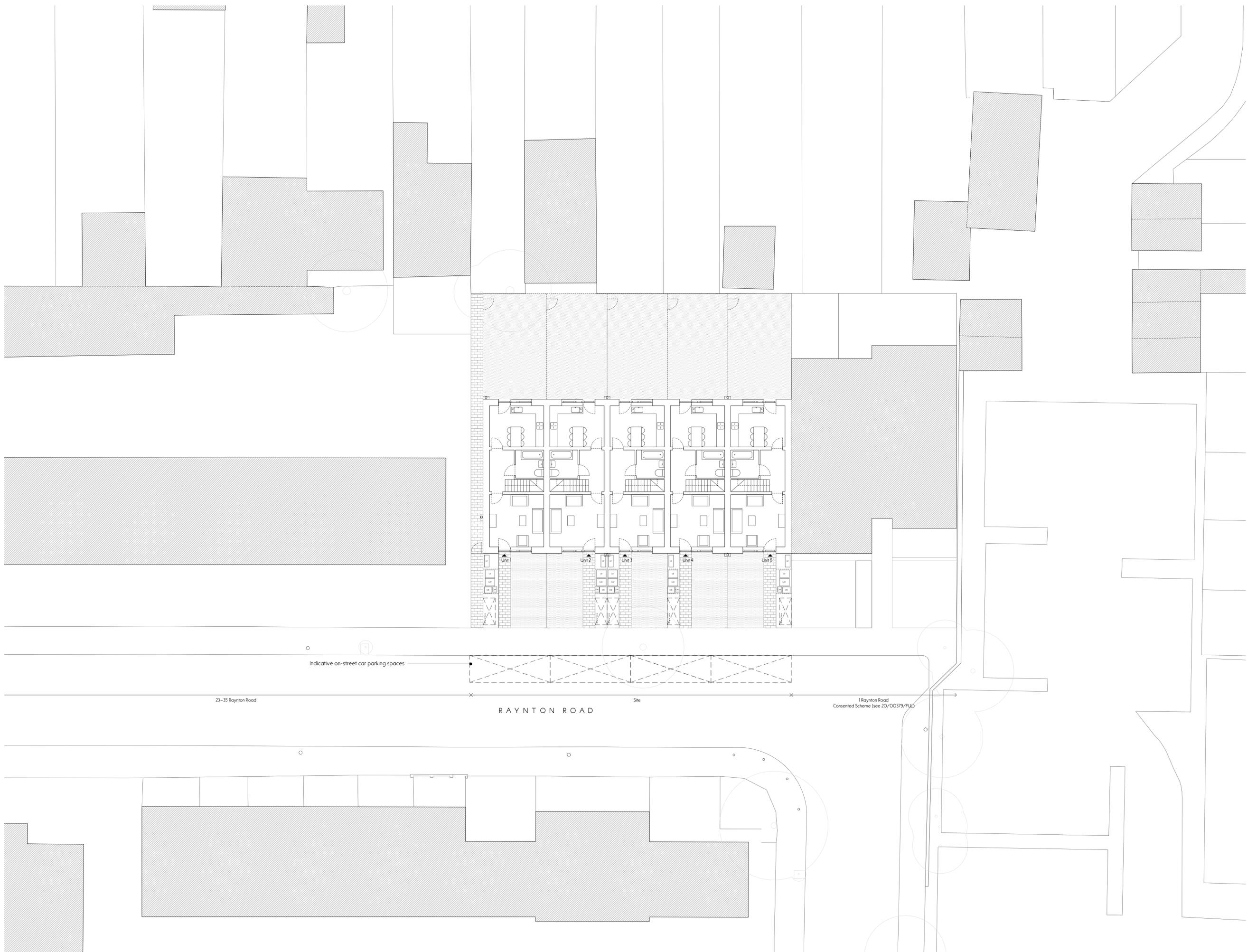
Notes

-  Paved hard standing
-  Soil planting bed
-  Topsoil soft landscaping
-  Grasscrete surfacing

NB: All areas of landscaping left un-hatched are to be retained and repaired if possible

 Area of recessed masonry with intel above to accommodate future adaptation

- HP Air source heat pump unit in acoustic enclosure
- OW Organic waste bin (240L)
- LB Large recycling bin (140L)
- MB Medium bin (140L)
- GW Garden waste bin (240L)



Notes

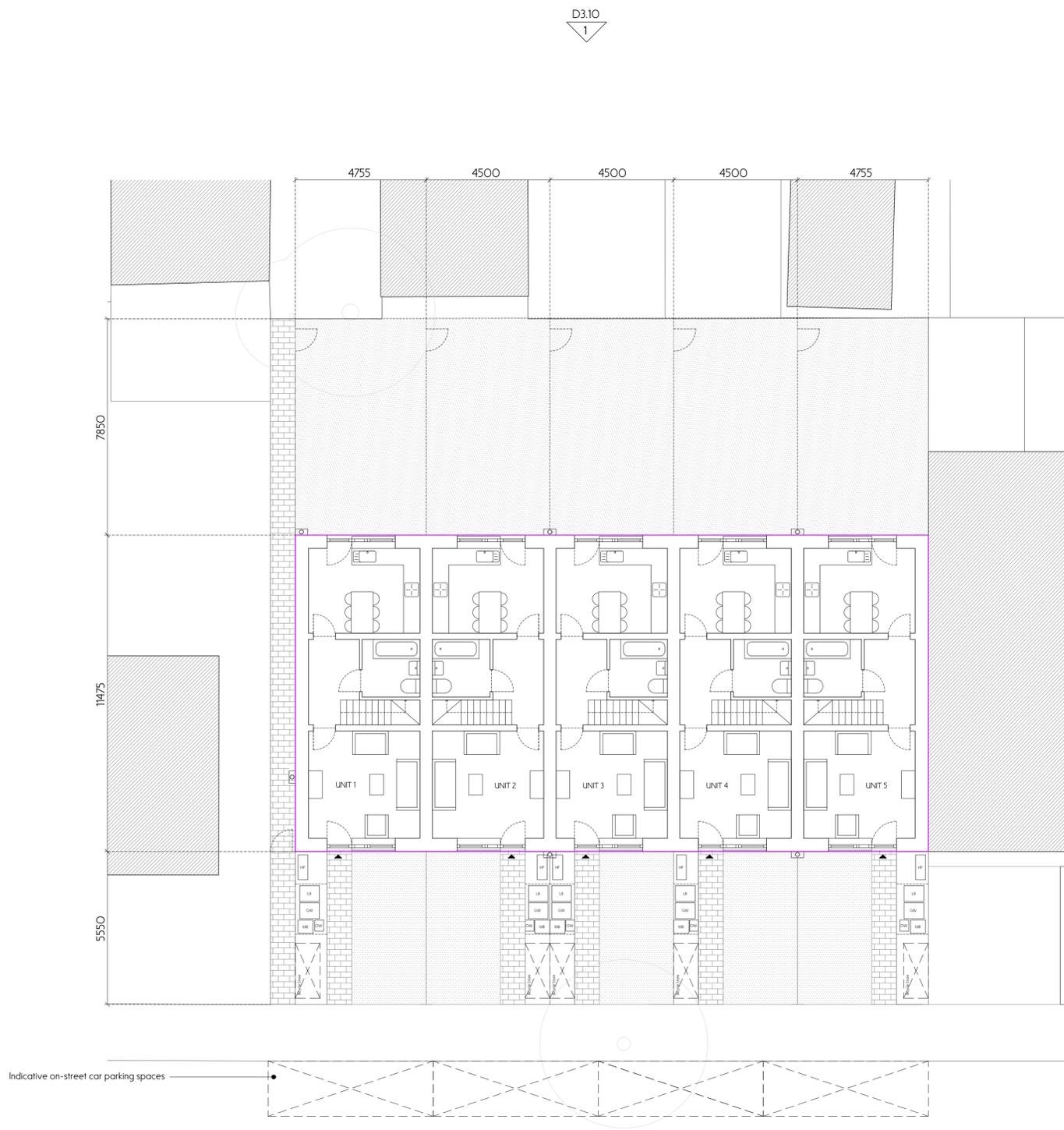
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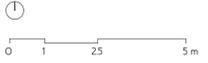
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- Phase 3
- Phase 4
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- Phase 6



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A	11 01 22	For Planning

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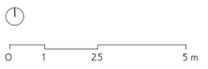
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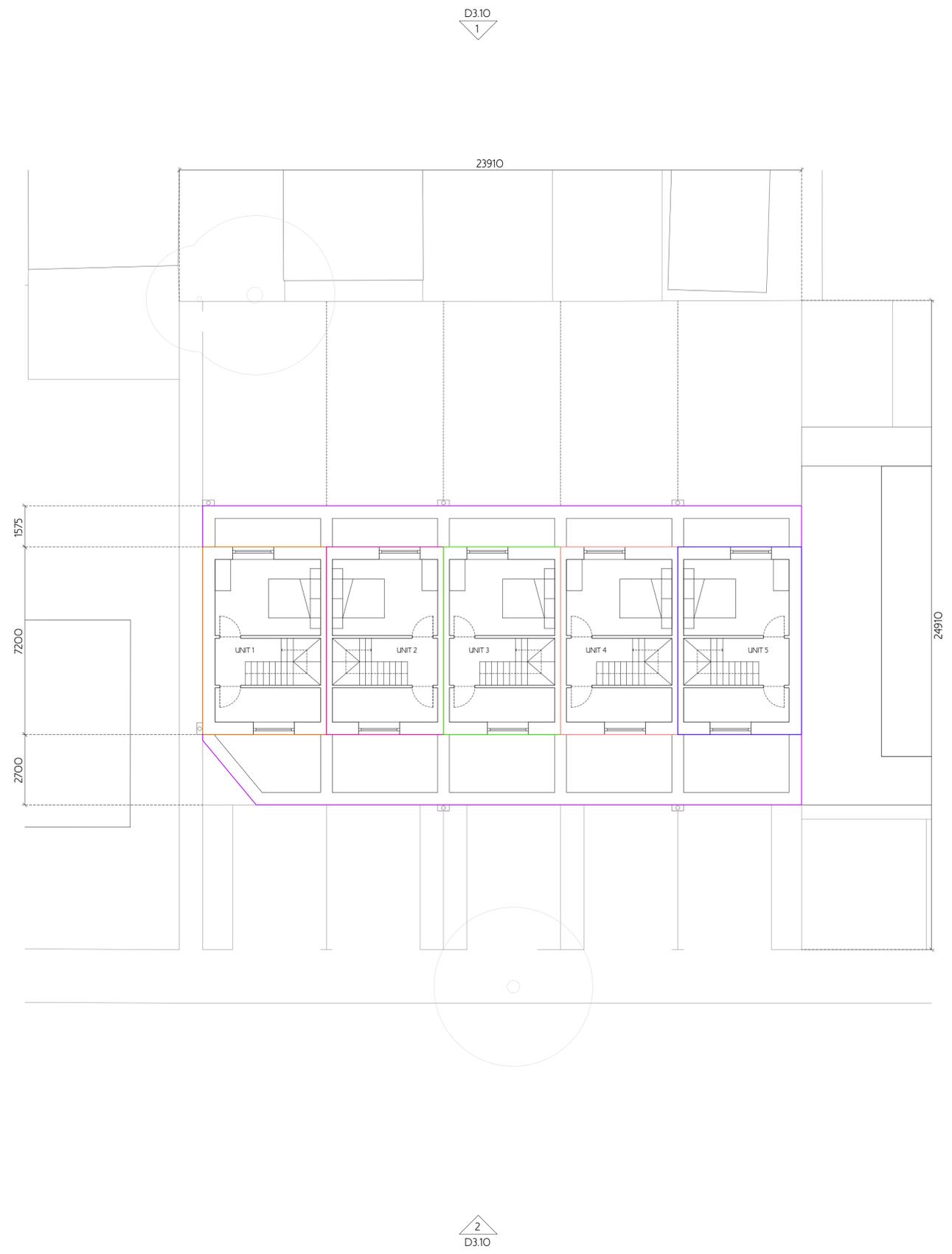
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A	11 01 22	For Planning

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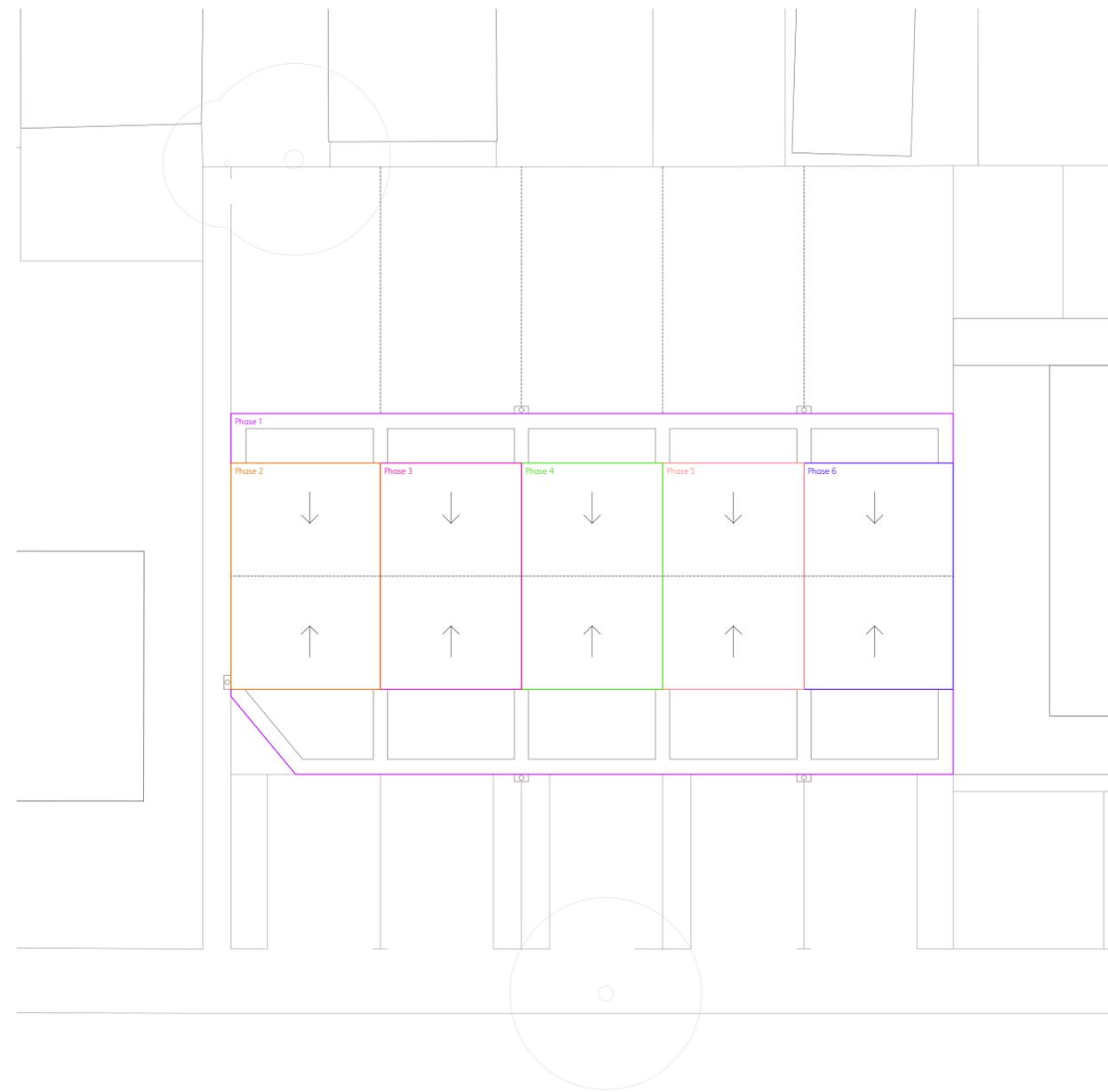
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-  Phase 4
-  Phase 5
-  Phase 6

D3.10  
 1



2  
 D3.10

Drawn	Checked	Scale
RS	JL	1:100 @ A1 1:200 @ A3



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Project No Raynton Road East  
 0081

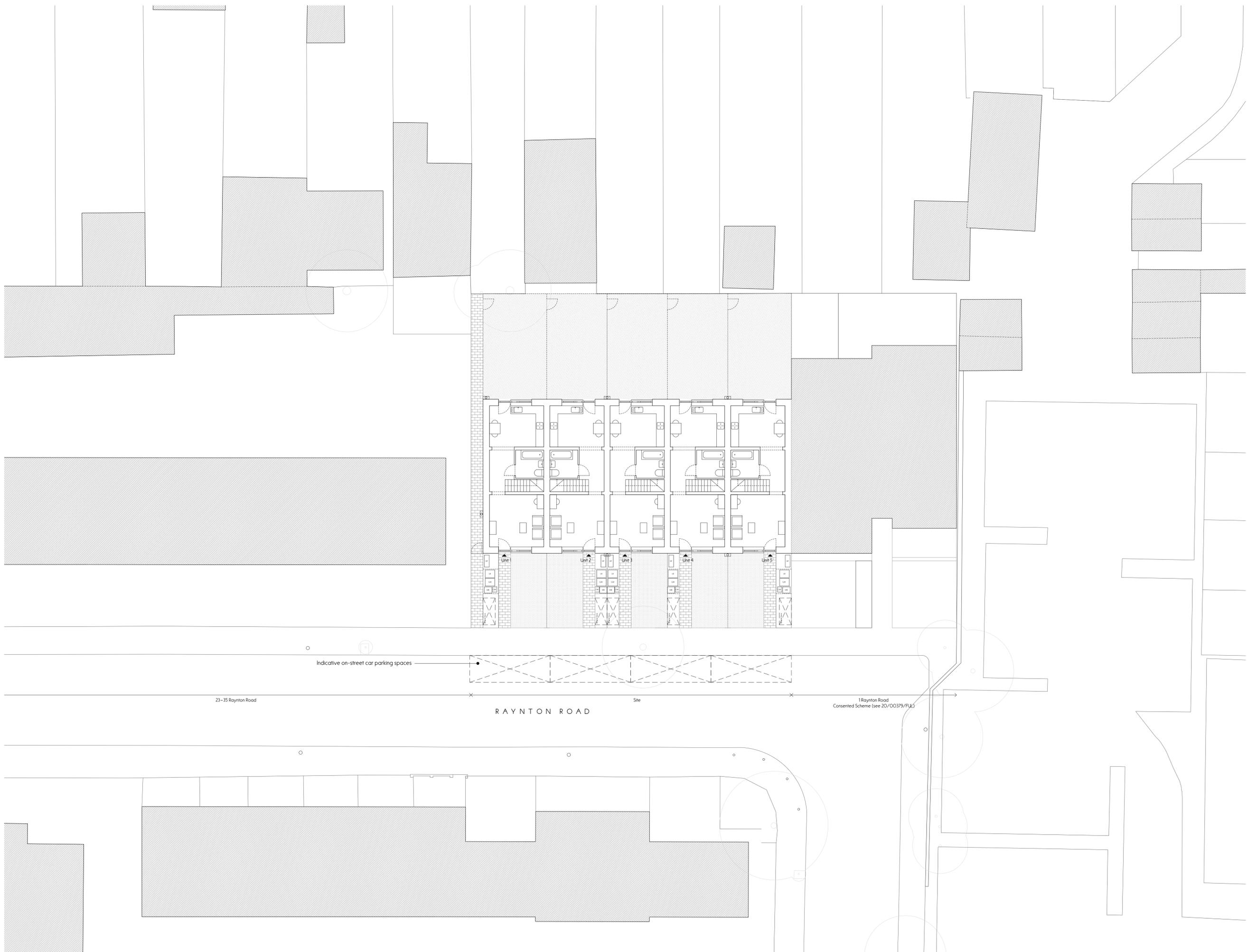
Client Naked House

Drawing Title Site Plan

Drawing No 3.00

Revision	Date	Description
-	19 08 21	For Planning
A	11 01 22	For Planning

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Indicative on-street car parking spaces

23-35 Raynton Road

RAYNTON ROAD

Site

1 Raynton Road  
 Consented Scheme (see 20/00379/FLA)

Drawn	Checked	Scale
RS	JL	1:125 @ A1 1:250 @ A3



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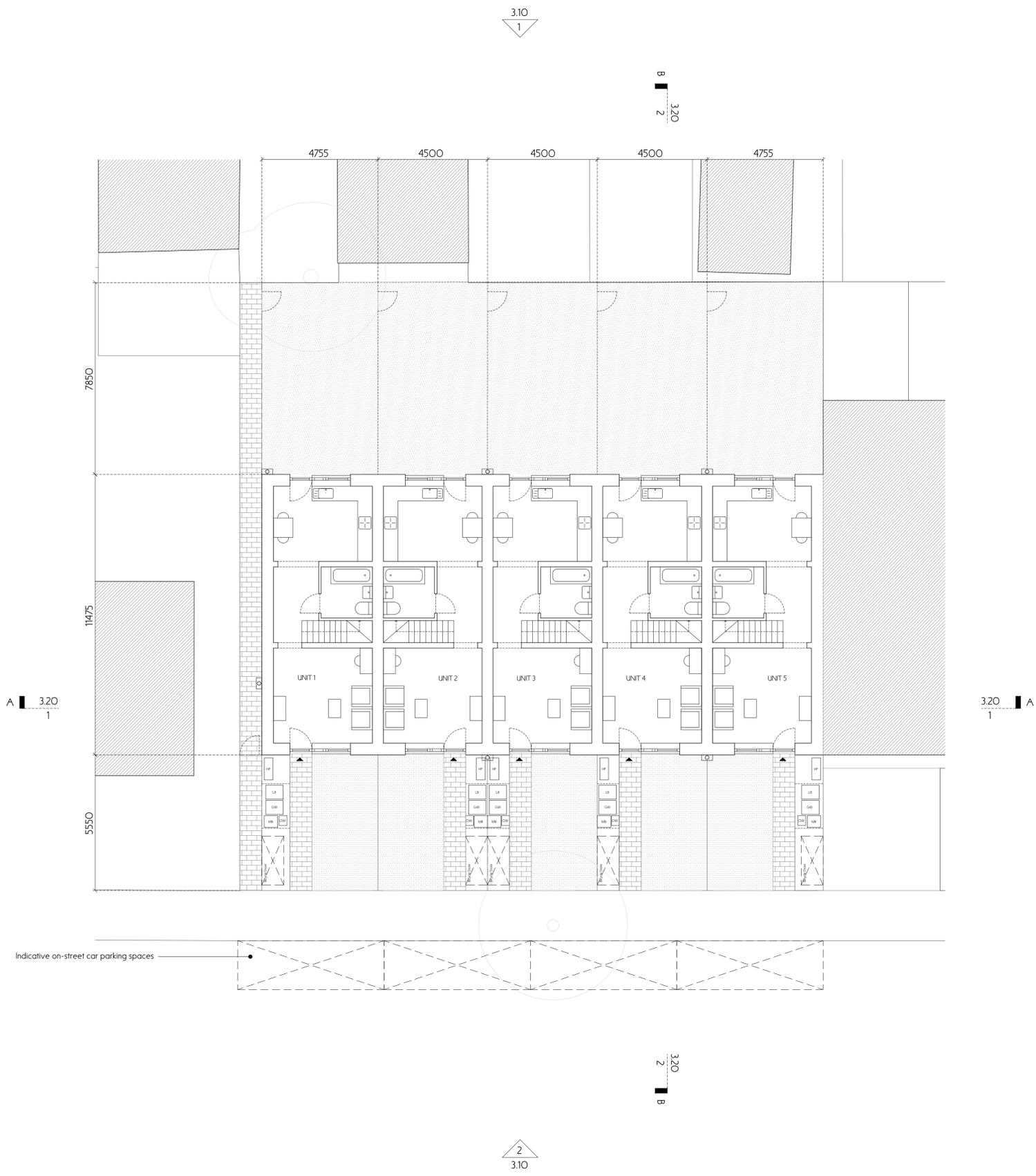
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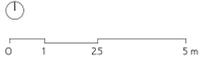
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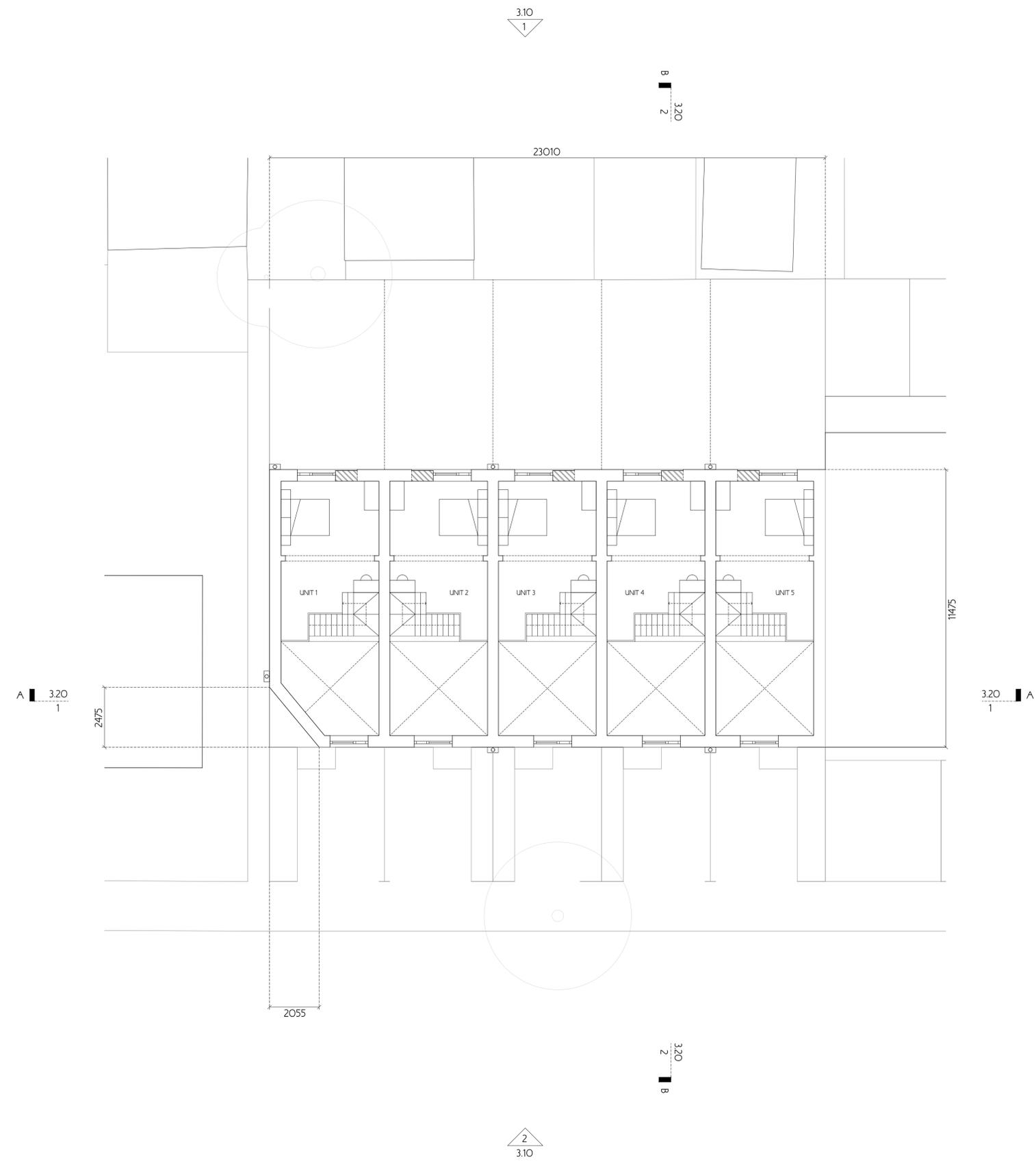
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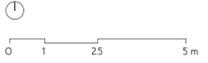
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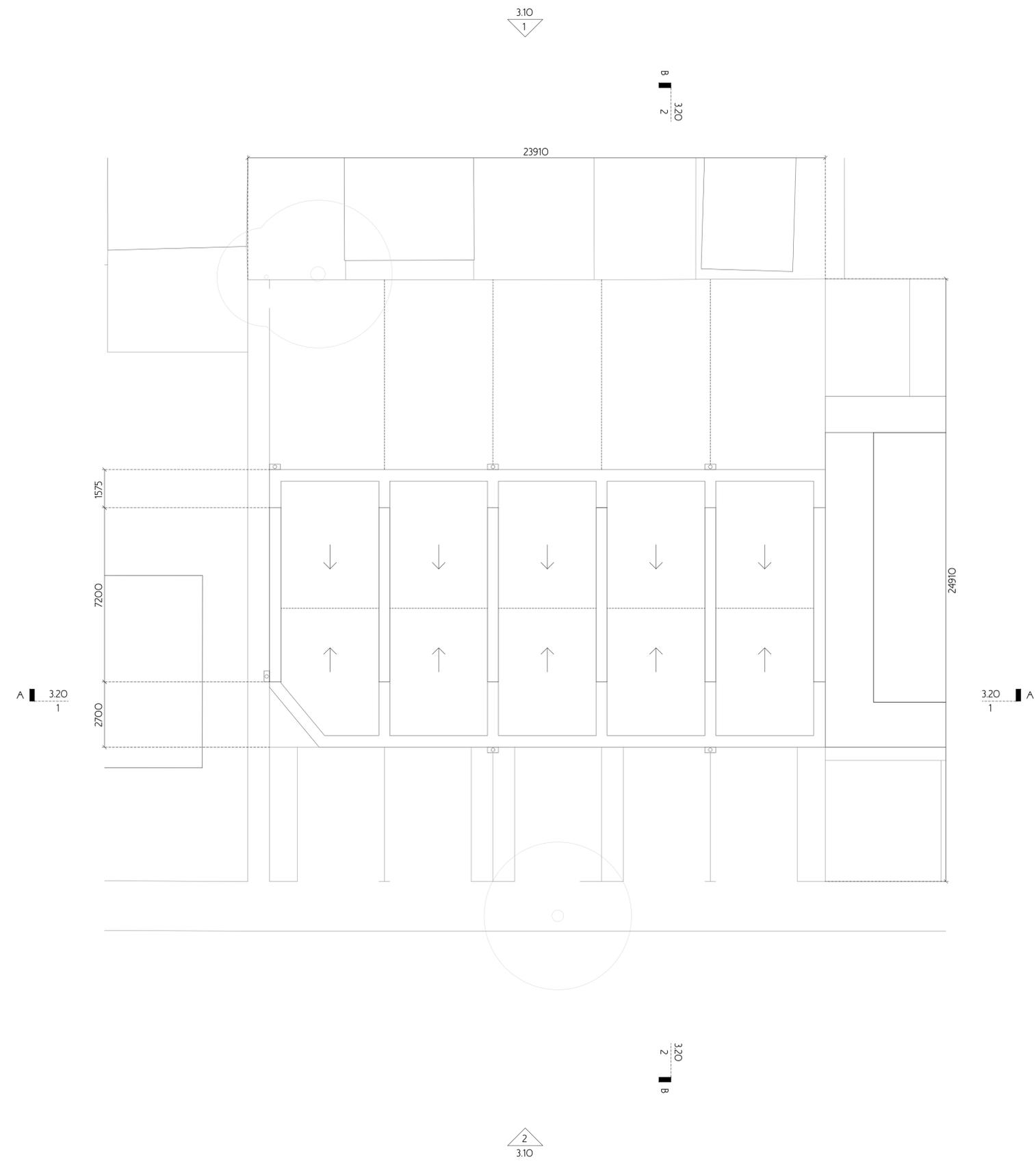
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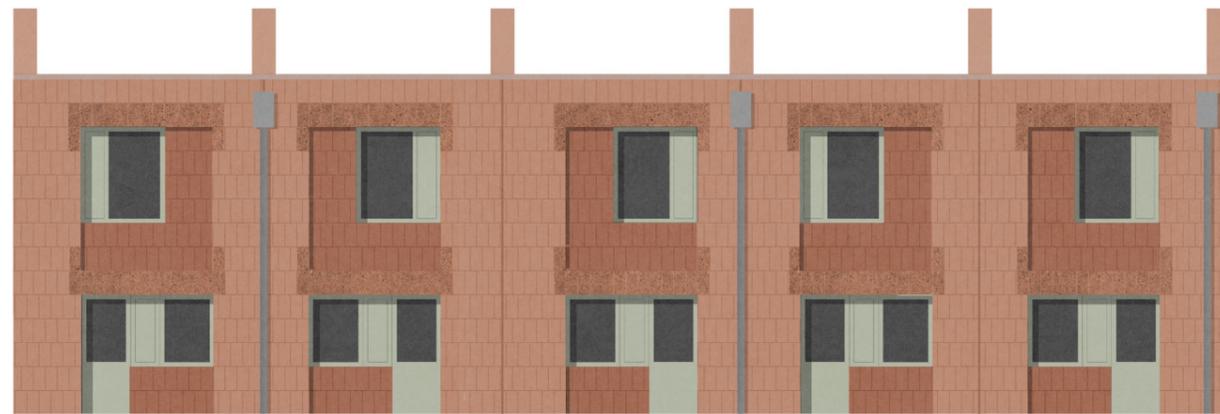
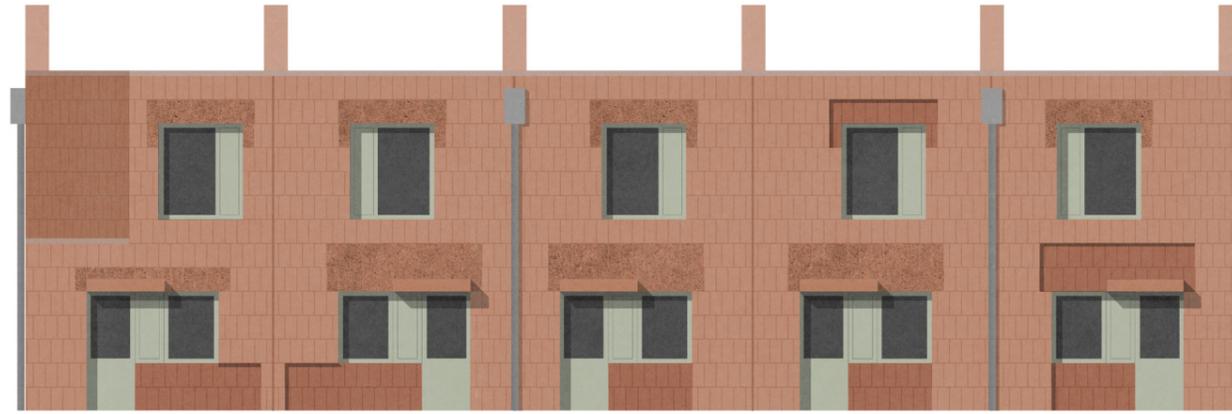
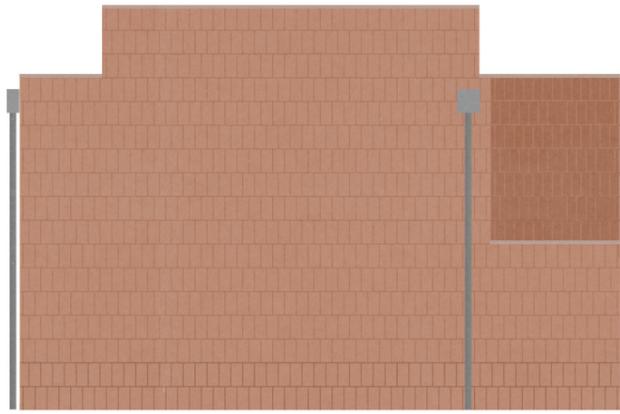
OMMX

Naked House

Planning Amendments

01 / 22

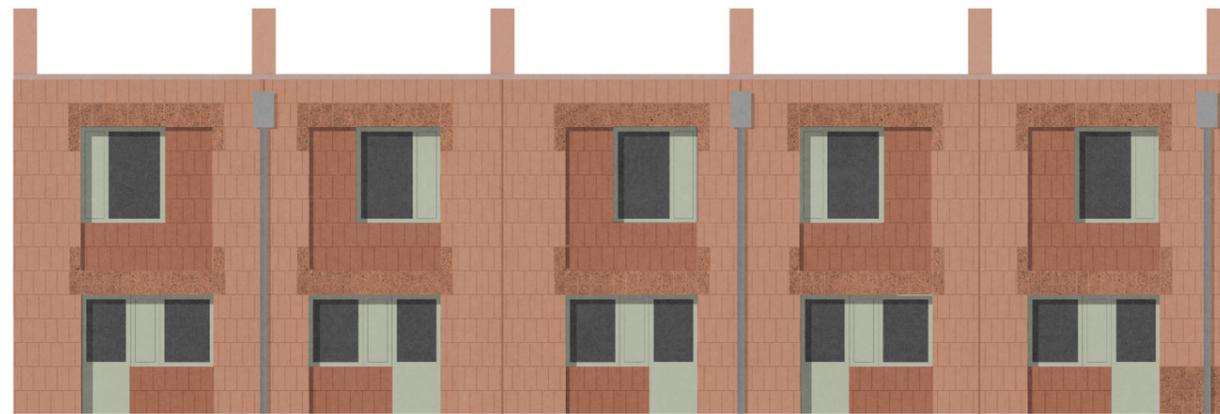
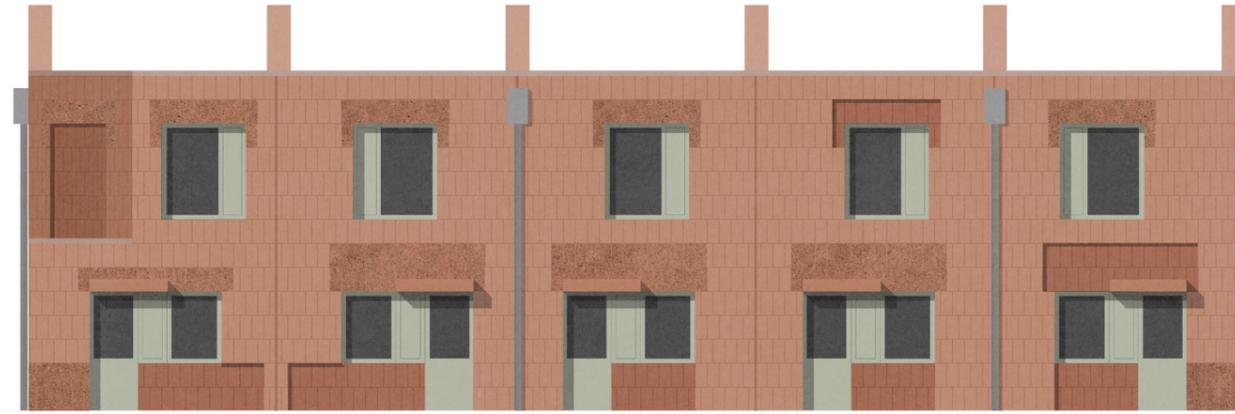
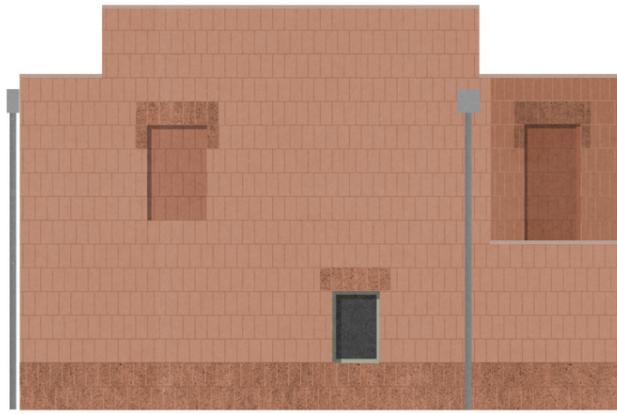
Previously Proposed



Raynton Road East, naked state

Top left      East elevation  
Top right     South elevation  
Bottom        North elevation

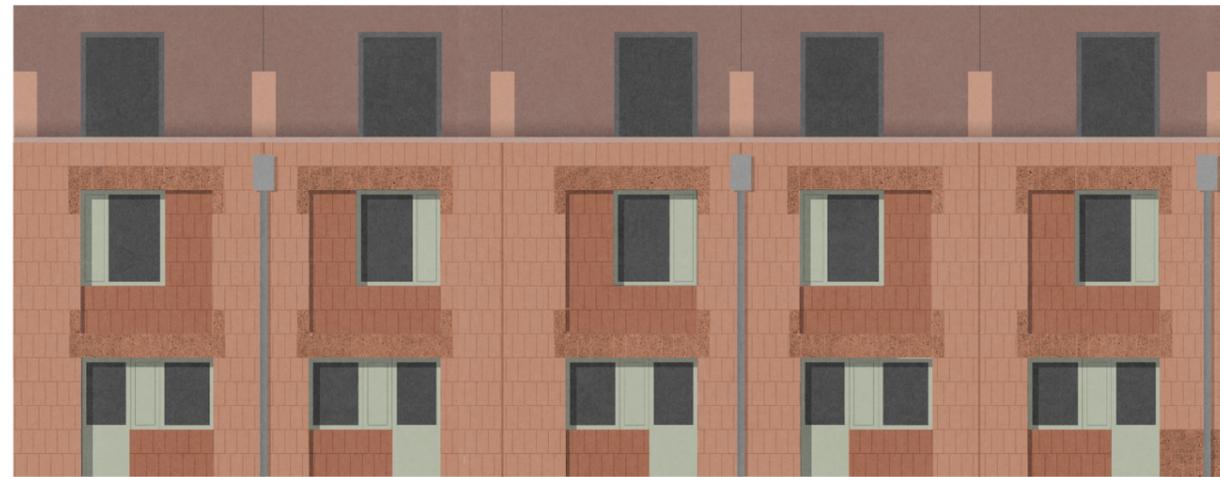
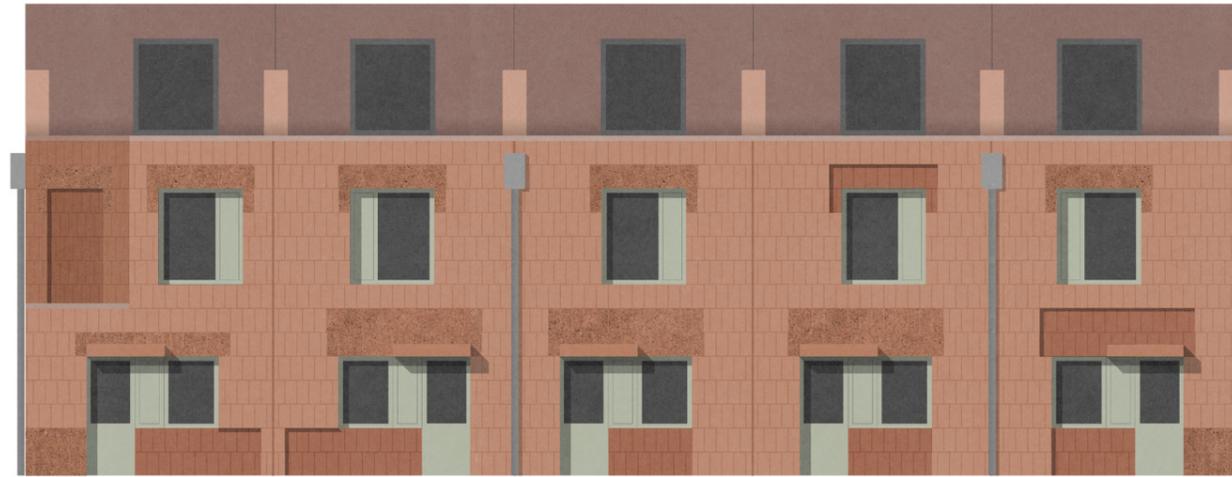
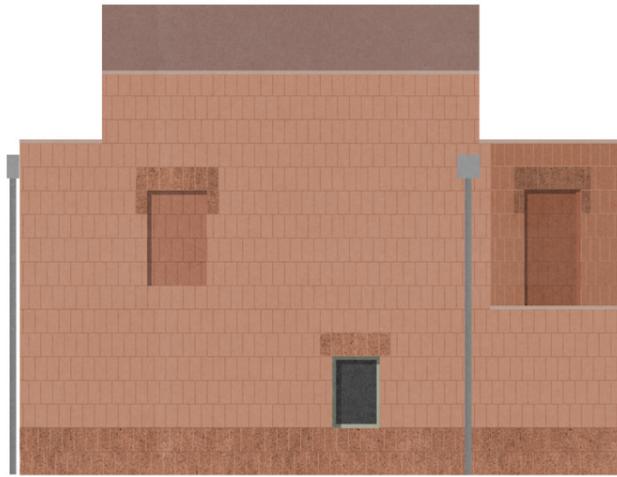
Proposed



Raynton Road East, naked state

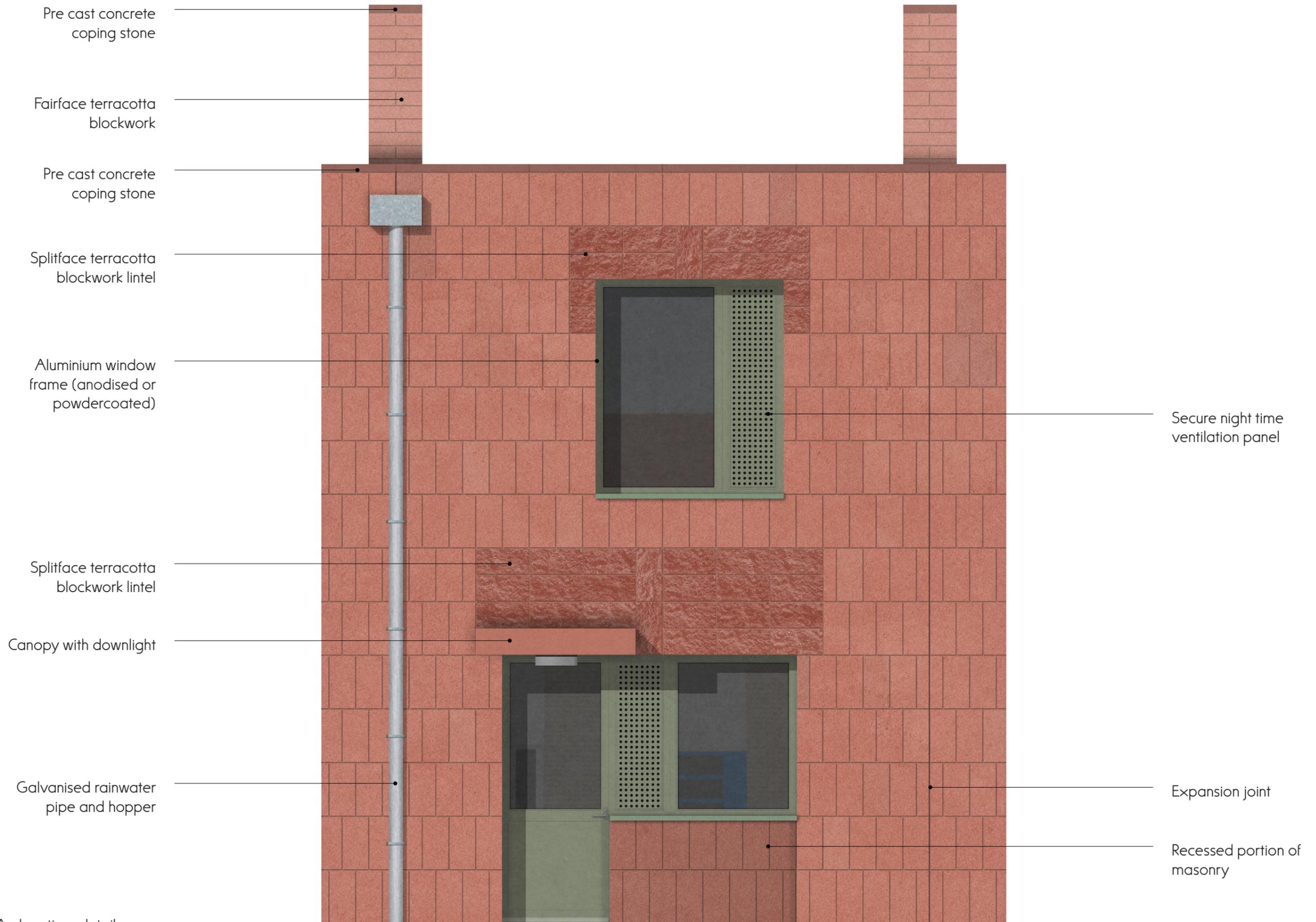
Top left      East elevation  
Top right     South elevation  
Bottom        North elevation

Proposed



Raynton Road East, developed state

Top left      East elevation  
Top right     South elevation  
Bottom        North elevation



Unit Type 1A elevation, detail

OMM×  
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London WC1N 2NP

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[www.officemmx.com](http://www.officemmx.com)

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