

LONDON BOROUGH OF ENFIELD

PLANNING COMMITTEE

Date: 03 February 2022

Report of:
Head of Planning

Contact Officer: Andy Higham
Allison De Marco Michael Cassidy

Ward:
Cockfosters

Application Number: 21/02517/FUL

Category: Major

LOCATION:

Land adjacent to Cockfosters Underground Station, Cockfosters Road, Barnet, EN4 0DZ

PROPOSAL:

Demolition of existing two-storey Train Drivers Accommodation building and erection of four buildings, with part basement area, ranging in height between 5 and 14 storeys with recessed rooftop plant and lift overruns located behind a parapet and screens, and comprising 351 new residential dwelling units (Class C3) with flexible retail ground floor unit (Class E and/or drinking establishment (Sui Generis) uses), replacement Train Drivers Accommodation (Sui Generis), cycle parking, public realm and open space, car parking, hard and soft landscaping, access and servicing, plant and associated works.

This application is a **DEPARTURE APPLICATION**: The proposed development is a departure from Policies DMD43 and DMD44 of the Enfield Local Plan: Development Management Document (2014) and Policy G4 of the London Plan (March 2021).

Applicant Name & Address:

Connected Living London (Cockfosters)
Ltd
8 – 14 Meard Street
London
W1F 0EQ

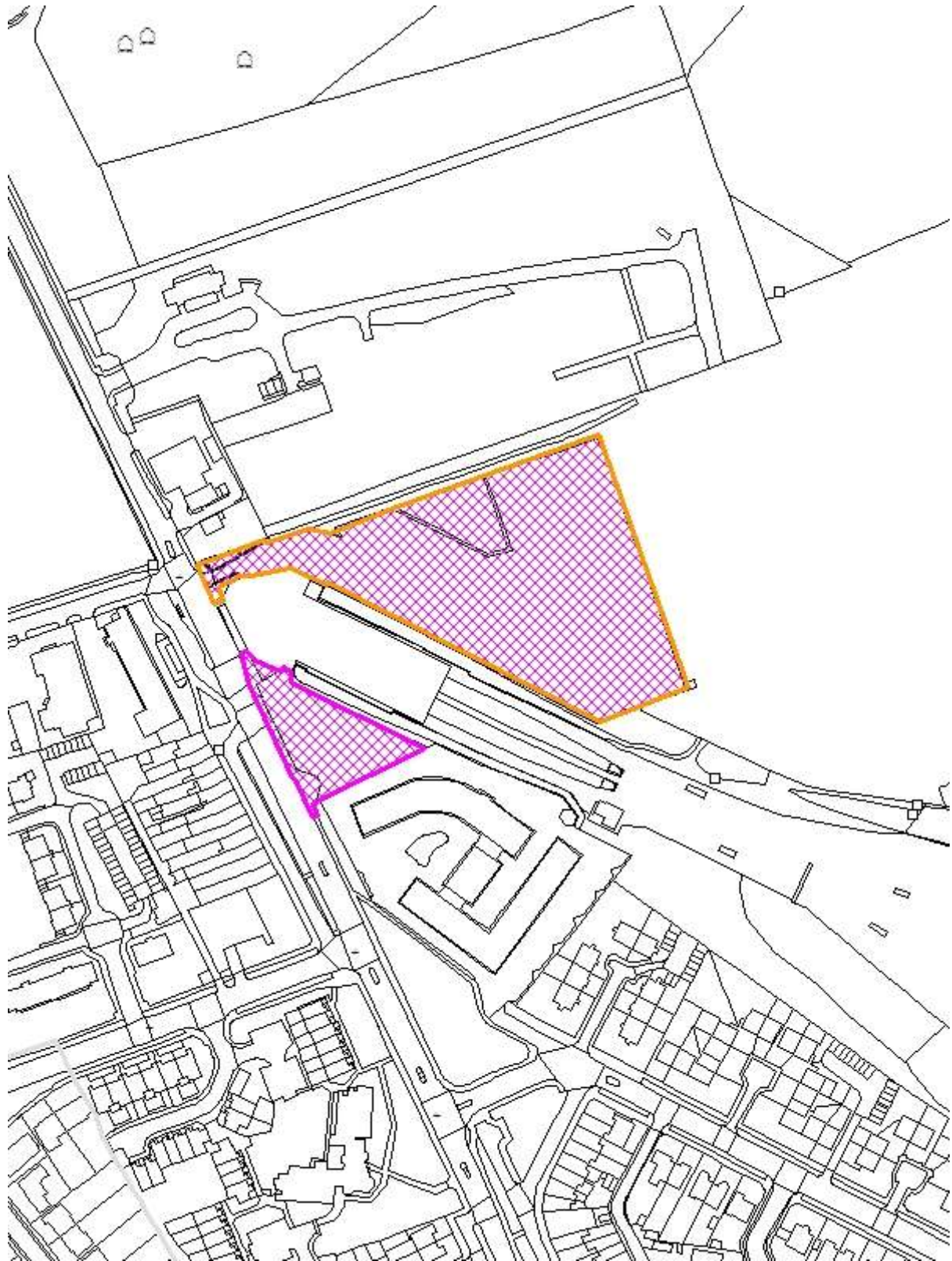
Agent Name & Address:

Matthew Sharpe
Quod
8 – 14 Meard Street
London
W1F 0EQ

RECOMMENDATION:

1. That subject to the Stage 2 referral to the Mayor of London and no objection being raised and the completion of a S106 to secure the matters covered in this report, the Head of Planning / Head of Development Management be authorised to GRANT planning permission subject to conditions.
2. That the Head of Planning / Head of Development Management be granted delegated authority to agree the final wording of the conditions to cover the matters in the Recommendation section of this report.

Ref: 21/02517/FUL LOCATION: Land Adjacent To Cockfosters Underground Station, Cockfosters Road, Barnet, EN4 0DZ



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Scale 1:1250

North



Drawings / Application Documents:

Drawings

Existing Site Plans

- CFCP-HBA-00-XX-DR-A-08-0000 P01 - Existing Location Plan
- CFCP-HBA-00-00-DR-A-08-0100 P01 - Existing Ground Floor GA Plan
- CFCP-HBA-00-01-DR-A-08-0101 P01 - Existing First Floor GA Plan
- CFCP-HBA-00-02-DR-A-08-0102 P01 - Existing Roof GA Plan
- CFCP-HBA-00-XX-DR-A-08-0012 PO1 - Existing Site Plan – Demolition
- CFCP-HBA-00-XX-DR-A-08-0200 PO1 - Existing Sitewide Elevations – Site A - North and East
- CFCP-HBA-00-XX-DR-A-08-0201 PO1 - Existing Sitewide Elevations – Site A - Cockfosters Road West
- CFCP-HBA-00-XX-DR-A-08-0202 PO1 - Existing Sitewide Elevations - Site B
- CFCP-HBA-00-XX-DR-A-08-0203 PO1 - Existing Sitewide Elevations – Site A – Train Drivers' Accommodation
- CFCP-HBA-00-XX-DR-A-08-0300 PO1 - Existing Section AA

Proposed General Arrangement Drawings

- CFCP-HBA-00-B-DR-A-08-0120 PO2 - Basement Floor GA Plan
- CFCP-HBA-00-00-DR-A-08-0121 PO2 - Ground Floor GA Plan
- CFCP-HBA-00-01-DR-A-08-0122 PO2 - First Floor GA Plan
- CFCP-HBA-00-02-DR-A-08-0123 PO2 - Second Floor GA Plan
- CFCP-HBA-00-03-DR-A-08-0124 PO2 - Third Floor GA Plan
- CFCP-HBA-00-04-DR-A-08-0125 PO2 - Fourth Floor GA Plan
- CFCP-HBA-00-05-DR-A-08-0126 PO2 - Fifth Floor GA Plan
- CFCP-HBA-00-06-DR-A-08-0127 PO2 - Sixth Floor GA Plan
- CFCP-HBA-00-07-DR-A-08-0128 PO2 - Seventh Floor GA Plan
- CFCP-HBA-00-08-DR-A-08-0129 PO2 - Eighth Floor GA Plan
- CFCP-HBA-00-09-DR-A-08-0130 PO2 - Ninth Floor GA Plan
- CFCP-HBA-00-10-DR-A-08-0131 PO2 - Tenth Floor GA Plan
- CFCP-HBA-00-11-DR-A-08-0132 PO2 - Eleventh Floor GA Plan
- CFCP-HBA-00-12-DR-A-08-0133 PO2 - Twelfth Floor GA Plan
- CFCP-HBA-00-13-DR-A-08-0134 PO2 - Thirteenth Floor GA Plan
- CFCP-HBA-00-14-DR-A-08-0135 PO2 - Fourteenth Floor GA Plan
- CFCP-HBA-00-15-DR-A-08-0136 PO2 - Roof GA Plan
- CFCP-HBA-00-XX-DR-A-08-0020 PO2 - Proposed Block Plan

Proposed Elevations and Sections

- CFCP-HBA-00-XX-DR-A-08-0220 PO2 - Proposed Sitewide Elevations – North
- CFCP-HBA-00-XX-DR-A-08-0221 PO2 - Proposed Sitewide Elevations – East
- CFCP-HBA-00-XX-DR-A-08-0222 PO2 - Proposed Sitewide Elevations - Cockfosters Road West
- CFCP-HBA-00-XX-DR-A-08-0320 PO2 - Proposed Section AA
- CFCP-MAE-B1-XX-DR-A-08-0250 PO2 - Block 1 - North and East Elevations
- CFCP-MAE-B1-XX-DR-A-08-0251 PO2 - Block 1 - South and West Elevations

- CFCP-HBA-B2-XX-DR-A-08-0260 PO2 - Block 2 - East and West Elevations
- CFCP-HBA-B2-XX-DR-A-08-0261 PO2 - Block 2 - North and South Elevation
- CFCP-HBA-B3-XX-DR-A-08-0270 PO2 - Block 3 - North Elevations
- CFCP-HBA-B3-XX-DR-A-08-0271 PO2 - Block 3 - East Elevations
- CFCP-HBA-B3-XX-DR-A-08-0272 PO2 - Block 3 - South Elevations
- CFCP-HBA-B3-XX-DR-A-08-0273 PO2 - Block 3 - West Elevations
- CFCP-MAE-B4-XX-DR-A-08-0280 PO3 - Block 4 – West and North West Elevations
- CFCP-MAE-B4-XX-DR-A-08-0281 PO3 - Block 4 - North and East Elevations
- CFCP-MAE-B4-XX-DR-A-08-0282 PO3 - Block 4 - South Elevation

Bay Studies

- CFCP-MAE-B1-XX-DR-A-08-0255 PO2 - Block 1 - Typical Bay Study
- CFCP-HBA-00-XX-DR-A-08-0265 PO1 - Block 2 + 3 – Typical Bay Study A
- CFCP-HBA-00-XX-DR-A-08-0266 PO1 - Block 2 + 3 – Typical Bay Study B
- CFCP-MAE-B1-XX-DR-A-08-0285 PO2 - Block 4 - Typical Bay Study

Landscape Plans

- CF116.3.P.00.ELP - Existing site landscape plan
- CF116.3.P.01.LP Rev P3 - Overview ground floor landscape plan
- CF116.3.P.02.RP Rev P2 - Roof plan
- CF116.3.P.03.RTP - Roof terrace plan (Block 2)
- CF116.3.P.04.SP - Surfaces plan (Ground)
- CF116.3.P.05.SCP - Section cut plan
- CF116.3.P.06.TP - Ground Floor Tree plan
- CF116.3.P.07.SPR - Surfaces plan (Roof)
- CF116.3.P.08.PA - Play areas plan
- CF116.3.P.09.BTP - Boundary treatment plan
- CF116.3.P.11.AMP - Access, movement and parking
- CF116.3.P.12.BP Rev P2 - Biodiversity plan and UGF (ground level landscape)
- CF116.3.P.13.PPG - Planting plan (ground level landscape)
- CF116.3.P.14.PPR - Planting plan (Roof)
- CF116.3.P.15.BPR Rev P2 - Biodiversity plan and UGF (Roof)
- CF116.3.SC.LS01 - Landscape Section AA & BB & CC
- CF116.3.SC.LS02 - Landscape Section DD & EE & FF
- CF116.3.SC.LS03 - Landscape Section GG & HH II
- CF116.3.SC.LS04 - Landscape Section JJ & KK & LL
- CF116.3.SC.LS05 - Landscape Section MM
- CF116.3.SC.LS06 - Landscape Section NN
- CF116.3.SC.LS07 - Landscape Section OO
- CF116.3.SC.LS08 - Amenity Roof Terrace Section Details
- CF116.3.DP01.MP - Hard Materials Palette
- CF116.3.DP02.PP - Planting Palette
- CF116.3.D.03.RD - Green and Brown Roof Detail

Documents

- Air Quality Assessment by Atkins dated June 2021

- Arboricultural Impact Assessment and Method Statement by Atkins dated June 2021
- Archaeological Desk Based Assessment by Atkins dated June 2021
- Daylight and Sunlight Assessment External (and Train Shed) by GIA dated June 2021
- Daylight and Sunlight Assessment Internal by GIA dated June 2021
- Daylight and Sunlight Assessment – External Addendum by GIA dated October 2021
- Daylight and Sunlight Assessment – Internal Rev 2 by GIA dated October 2021
- Design and Access Statement by Hawkins\Brown, Mae and JCLA dated June 2021
- Design and Access Statement Addendum (Rev 2) by Hawkins\Brown, Mae and JCLA dated November 2021
- Detailed Circular Economy Statement by Aecom dated June 2021
- Drainage Strategy (Rev 7.0) by Atkins dated January 2022
- Ecological Impact Assessment and Biodiversity Net Gain Assessment by Atkins dated June 2021
- Energy Assessment by Atkins dated June 2021
- Energy Assessment Addendum (Rev 2.0) by Atkins dated October 2021
- Equality Statement by Quod dated June 2021
- Fire Statement by Hoare Lea dated June 2021
- Flood Risk Assessment by Atkins dated June 2021
- Health Impact Assessment by Quod dated June 2021
- Heritage Statement by ABA dated June 2021
- Heritage Statement Addendum by ABA dated October 2021
- Housing Delivery Statement by Quod dated June 2021
- Noise and Vibration Assessment Report by Atkins dated June 2021
- Phase 1 Geo-environmental and geotechnical desk-based Assessment by Atkins dated June 2021
- Planning Statement (Rev 3) by Quod dated November 2021
- Sustainability Statement by Atkins dated June 2021
- Statement of Community Involvement by Concilio dated June 2021
- Townscape and Visual Impact Assessment by ABA dated June 2021
- Townscape and Visual Impact Assessment Addendum by ABA dated October 2021
- Transport Assessment by Pell Frischmann dated June 2021
- Viability Assessment by Savills dated June 2021
- Wind Microclimate Assessment by Urban microclimate dated June 2021

1. EXECUTIVE SUMMARY

- 1.1 The proposed development will bring forward the regeneration of the site and is aligned with the Council's desire for future growth within the Cockfosters area. The proposed redevelopment of the car parks at Cockfosters Underground Station has been developed in the context of the relevant local, London and national planning policy. The proposed site is a brownfield site in a highly sustainable location at Cockfosters Underground Station. As a previously developed site which is currently underutilised, the Proposed Development for housing is fully supported by policies for boosting the supply of homes (NPPF and policies GG2 and H1 of the London Plan).
- 1.2 The proposal would provide 351 residential units of which 132 would be affordable units (which is 38% of units or 40% by habitable room) which will contribute to

meeting the housing needs of the Borough. The proposal has been viability tested and the 40% offer made is considered the maximum reasonable proportion of affordable housing that the scheme can currently provide.

- 1.3 The application has been advertised as a departure from policy on the basis that it is not in accordance with Policies DMD43 and DMD44 of the Local Plan and Policy G4 of the London Plan.
- 1.4 The height and massing of the development has been assessed in relation to its impact from a wide range of viewpoints and has been found to be satisfactory, including in relation to its impact on heritage assets. An assessment of the current application has identified less than substantial harm caused to heritage assets. This view is supported by both the GLA and Historic England who have also come to the same conclusion. In line with paragraph 202 of the NPPF, the resulting harm would be outweighed by the many public benefits of the proposal which include:
 - Heritage - enhancements to Trent Park, Cockfosters Road and Cockfosters Station;
 - New Homes - delivery of 351 new housing, including 132 affordable housing units (40% by habitable room or 38% based on units);
 - Increasing and improving open space provision – the existing 815sqm of currently inaccessible designated Local Open Space would be replaced with a new publicly accessible amenity spaces within the site amounting to 4,200sqm and forming part of a comprehensive landscape scheme with significant tree planting that would provide accessible public realm that can be used by the local community; and
 - Improving and Enhancing Public Realm - enhancements to public realm and way finding, including through provision of 4,200sqm of high quality, permeable public realm.
- 1.5 The proposal is considered to be in accordance with policy HC1 of the London Plan and would successfully delivering positive benefits that conserve and enhance the historic environment, as well as contributing to the economic viability, accessibility and environmental quality of a place, and to social wellbeing. As a result of the social, economic, environmental and sustainability value that the scheme would bring, with the addition of the benefits identified above, it is considered that the public benefits of the application scheme outweigh the departure from policy and the 'less than substantial' harm identified.
- 1.6 The height of the development in this highly publicly accessible transport location is considered to be acceptable. The proposed buildings on the site have been sensitively designed, taking inspiration from the surroundings and historic context of the site, and would respect the character, context and the form and scale of neighbouring buildings and would sit comfortably within the streetscene and surrounding area. The appearance, materials, detailed façade treatment, landscape and public realm design of the development is considered to be of high quality, displaying an appropriate response to the surrounding character. The identified 'less than substantial harm' to the setting of nearby listed buildings and the Trent Park Conservation Area is considered to be justified and outweighed by the above public

benefits. There are some outstanding design issues that have been raised by the Council's design officers. However, in the overall assessment it is considered that the aspects of the scheme design that raise concern can either be justified or suitably addressed by condition.

- 1.7 Given the distance and orientation to the nearest residential properties, and the inclusion of appropriate mitigation measures, the proposal would not result in any significant material impact in terms of overlooking.
- 1.8 The proposed scheme does result in some adverse and noticeable reductions in daylight and sunlight as identified. However, consideration should be given to the particular characteristics of the properties reviewed and to the fairly minimal existing massing on the application site which is unusual in an urban context. It is also reasonable to consider the identified effects alongside the planning merits of the scheme overall. In conclusion, officers consider that the overall impact of the scheme in terms of daylight, sunlight and overshadowing along with the many planning benefits that the scheme would deliver, weighs strongly in favour of the proposal.
- 1.9 The proposed development would meet all relevant residential space standards and the provision for private and communal amenity space and playspace proposed is considered to be acceptable. Adequate levels of daylight would also be provided within the flats for future residents. The proposal provides units with a good standard of accommodation, in terms of unit sizes, aspect and amenity space provision, being provided.
- 1.10 The development would have a sustainable construction, meeting all of the relevant sustainability standards. The car free development, and provision of a new public square, will vastly improve permeability throughout the site, in stark contrast to the existing situation. It will also result in a shift away from the private car and encourage active travel and the use of public transport in line with the Mayor's Transport Strategy for Healthy Streets.
- 1.11 The likely impact of the reduction in public car parking spaces (non-blue badge) and the merits of encouraging sustainable travel options have been fully assessed and are considered acceptable and would benefit improving air pollution and noise disturbance locally.
- 1.12 As such, the proposal has been assessed in accordance with Sections 16, 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990, Section 70(2) of the Town and Country Planning Act 1990 and Section 38(6) of the Planning and Compulsory Purchase Act 2004, the NPPF and the development plan. Officers consider that the scheme is acceptable and that the many planning benefits the development would deliver over and above those required by policy are sufficient to outweigh the identified impacts on heritage and residential amenity. In this instance, taking account of all the relevant material considerations, and notwithstanding the departure from the departure from Policies DMD43 and DMD44 of the Enfield Local Plan: Development Management Document (2014) and Policy G4 of the London Plan (March 2021), the proposal is considered to be acceptable in all other respects, including the land uses proposed, transport impacts, sustainability, landscaping and

urban greening. As such, the weight of the material considerations considered are sufficient to justify a departure from the development plan in this instance such that the Council is able to support the proposed development.

2. RECOMMENDATION

2.1 That subject to the Stage 2 referral to the Mayor of London and no objection being raised and the completion of a S106 to secure the matters covered in this report, the Head of Planning or the Head of Development Management be authorised to GRANT planning permission subject to conditions

2.2 That the section 106 legal agreement referred to in resolution (2.1) above is to be completed no later than 31/03/2022 or within such extended time as the Head of Development Management shall at their discretion, allow; and

2.3 That delegated authority be granted to the Head of Planning or the Head of Development Management to make any alterations, additions or deletions to the recommended heads of terms and/or recommended conditions as set out in this report and to further delegate this power to agree the final wording provided this authority shall be exercised in consultation with the Chair (or in their absence the Vice-Chair) of the Planning Committee.

2.4 Conditions

1. Time limit – 3-year time limit
2. Development in Accordance with Approved Drawings and Documents
3. Materials – including samples and 1-1 mock-ups on site
4. Surfacing materials – including samples
5. Detailed drawings of key thresholds, openings, parapets, typical bays etc
6. Details of all means of enclosure - site boundary and within site: terraces and balconies
7. Playspace Design
8. Landscaping and Public Realm Implementation Plan (Final)
9. Secure by Design
10. Inclusive Design - M4(2) and M4(3)
11. Sustainable Drainage Strategy including Rainwater Harvesting
12. Sustainable Drainage Strategy - Verification Report
13. Lighting Details / Plan (Building & Public Realm)
14. Site Management Plan (operational) / Refuse & Recycling Strategy
15. Noise Levels – Construction
16. Noise Mitigation Measures (future occupants)
17. Disabled Parking
18. Car Park Management Plan (Final)
19. Details of Cycle Parking
20. Delivery and Servicing Management Plan (operational)
21. Construction Logistics Management Plan (CLMP)
22. Tree Protective Measures / Construction Works within RPA
23. Contaminated Land – Remediation
24. Contaminated Land – Verification

25. Energy Assessment (Final)
26. Whole Life Carbon
27. Circular Economy
28. Communal aerial
29. Digital connectivity
30. Details of any Rooftop Plant, Extract Ducts and Fans incl. Plant – Acoustic Report (Final)
31. Details of any rooftop plant, extract ducts and fans (appearance)
32. Thames Water
33. Fire evacuation lift (details / management)
34. Fire strategy
35. Electric vehicles
36. Nesting Boxes
37. Access demarcation
38. Taxi stand details
39. Blue badge parking and survey
40. Air quality mitigation
41. Non-road mobile machinery
42. Impact piling
43. Construction Dust Management Plan
44. Detailed tree Protection scheme including auditable schedule of arboricultural supervision/ inspection
45. Landscaping management plan
46. Green roof - details
47. Energy – compliance with strategy
48. Energy performance certificates
49. Mechanical ventilation system details
50. Water efficiency
51. Considerate Constructor's Scheme

2.5 Informatives

- 1) CIL Liable
- 2) Hours of Construction
- 3) Underground Water Supply/Drainage Assets
- 4) Cranes and Plant
- 5) Access to Railway

Section 106 Heads of Terms

2.6 The NPPF requires that planning obligations must be:

- (a) Necessary to make the development acceptable in planning terms;
- (b) Directly related to the development; and,
- (c) Fairly and reasonably related in scale and kind to the development.

2.7 Regulation 122 of the CIL Regulations 2010 brought the above policy tests into law, requiring that planning obligations can only constitute a reason for granting planning permission where they meet such tests. Section 106 obligations should be used

where the identified pressure from a proposed development cannot be dealt with by planning conditions and the infrastructure requirement relates specifically to that particular development and is not covered by CIL.

- 2.8 The Council's Planning Obligations SPD (November 2016) provides guidance on, amongst other things, the range and nature of planning obligations that the Council will seek, including details of the formulas used for calculation. The Council's Infrastructure Funding Statement (2019/2020) sets out planned expenditure over the current reporting period (2020/21).
- 2.9 Officers have secured Section 106 contributions towards transport [**£TBC**] and health [**£179,800**]. In addition, Community Infrastructure Levy in the order of **£4,000,000** would be payable.
- 2.10 These are the Heads of Terms proposed:
 1. Affordable Housing:
 - a. Minimum of 40% by habitable room (37.6% based on units);
 - b. Tenure to comprise 61% Discounted Market Rent (DMR) (81 units), 27% DMR homes (41 units) to be let at London Living Rent equivalent levels and 11% to be let at London Affordable Rent equivalent levels (10 units);
 - c. Rents set up to 70% of open market rent rates subject to the GLA's household income cap in place at the time of letting;
 - d. Marketing Campaign Scheme for affordable homes – prioritising households that live or work in the Borough;
 - e. All related communal open space and play space in a particular Block or Plot to be available to all residents (irrespective of tenure);
 - f. Quality standards;
 - g. Affordable housing secured in perpetuity.
 2. Viability Review Mechanisms:
 - a. Early Stage Review (if no "substantial commencement" within 24 months);
 - b. Late Stage Review (prior to 75% of private residential units being sold or let); and
 - c. Early and Late Stage Reviews capped at 40% Affordable Housing (70% Discounted Market Rent (DMR) and 30% DMR homes to be let at London Living Rent levels (LLR)) with additional Affordable Units proviso allowing deeper discounts to be provided, or DMR to be converted to LLR to achieve greater affordability if the outcome of any review determines that this is viable.
 3. Build to Rent requirements:
 - a. 15-year minimum covenant;
 - b. Clawback clause;
 - c. Self-contained and let separately;
 - d. Unified management and ownership of the private and Discount Market Rent elements of the scheme;
 - e. Longer tenancies (a minimum of 3 years) are available to all tenants, unless a shorter term is requested by the prospective tenant;

- f. Rent and service charge certainty for the length of the tenancy;
- g. On-site management;
- h. Complaints service in place; and
- i. No up-front charges etc.

4. Local Car Parking Controls: Management and Monitoring:

Allocation scope:

- a. To notify LBE a minimum of 4 months before closure of the car parks
- b. To enter into an appropriate [s278] agreement with Barnet to ensure the delivery of the Barnet Parking Scheme – [£TBC]
- c. Enfield Parking Scheme [up to £TBC]
 - 1st EPS payment - design, consultation and TMOs etc.
 - 2nd EPS payment – implementation of parking controls
 - 3rd EPS payment - post-implementation review

5. Highway Improvements (£TBC):

Allocation scope:

- a. Access junction improvements - implemented through Section 278;
- b. Contribution to Active Travel Zone Improvements – Routes 1-4 identified in the TA; and
- c. Contribution to sustainable transport improvements – upgrade to existing cycle facilities on Cockfosters Road [£TBC].

6. Car Park Management Plan

- a. Car park signage – spaces/no spaces etc.;
- b. Arrangements for enforcement of restrictions;
- c. Monitoring of use of car parking, including review and, if necessary, amendments to drop-off arrangements and layout if problems arise; and
- d. Allocation of spaces to blue badge holders and other priority users identified in EQIA.

7. Sustainable Transport Package:

Allocation scope:

- a. Obligation to provide Car Club Membership per home for 3 years; £50 car club driving credit per home; £50 Oyster or Cycle voucher.
- b. Travel Plan monitoring (**£5,500**), including an Obligation to provide a Travel Plan to be prepared and implemented; commitment to review; appointment of Travel Plan Coordinator and monitoring of Travel Plan initiatives including TRICS compliant surveys biannually for five years.

8. New Resident Parking Exemption

- a. Resident car ownership would be managed by the developer. The Developer would inform and advise residents of the development to prevent them applying for or being eligible for on-street parking permits within the relevant Controlled Parking Zone.
- b. This will be secured via the S106 agreement using powers under S16 of the Greater London Council (General Powers) Act 1974.

9. Car Club
 - a. For a car club space to be provided within the development. Evidence that a contract with a relevant provider to be made available prior to occupation.

10. Energy
 - a. DEN Strategy - submission and approval by the Council prior to commencement of the development.
 - b. Alternative Strategy - submission and approval by the Council prior to commencement of an "Alternative Strategy" in the event that is not possible, practical or viable to connect to the Off-Site Primary Heating Network in accordance with the Approved DEN Strategy
 - c. Development to provide no less than a 35% improvement in total CO2 emissions arising from the operation of the development and its services over Part L of Building Regs 2013.
 - d. Revised Energy Statement to be submitted and approval by the Council prior to commencement and payment of Carbon off-set contribution (if required) within 20 Working Days of notification of the relevant Approved Energy Plan; and
 - e. Be Seen (Post construction monitoring). Post construction monitoring as per 'be seen' guidance.

11. Carbon Offsetting financial contribution (estimated to be **£205,742**)
 - a. Payment of the agreed carbon off-set contribution (based on a calculation of £95/tonne on the anticipated CO2 emissions shortfall, the payment is estimated to be **£205,742**. The final figure will be calculated using a formulaic approach on the basis of the Revised Energy Statement to be agreed under 10 c.);
 - b. Sign up to GLA energy monitoring platform.

12. Health financial contribution
 - a. Payment of contribution (**£179,800**).

13. Employment & Training
 - a. Local Labour (during construction phase); and
 - b. Employment & Skills Strategy submitted and approved prior to commencement of building works on Site A (Buildings 1, 2 and 4) and Site B (Building 4) using reasonable endeavours to secure:
 - (i) 25% of local workforce;
 - (ii) A number of apprentice or trainee with capped financial contribution if target not met; reasonable endeavours for further roles
 - (iii) Quarterly apprenticeship reporting and targets;
 - (iv) Local goods and materials; and
 - (v) Partnership working with local providers/ programmes).

14. Public Realm
 - a. Public Realm Use and maintenance of Station Square and ground floor amenity space – to be delivered as a publicly accessible space and maintained by the developer.
 - b. Public access – ensuring public access to proposed square (365 days,

24/7), save for reasonable management and maintenance and LU operational activities.

15. Play Space

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

16. Architect Retention Clause

- a. To use reasonable endeavours to ensure that the Architect continues to be employed as lead designer or for Design Monitoring for the duration of the Construction Phase until the Completion Date.

17. Future Links to London Loop

- a. To provide connections from the site to the London Loop with a scheme being prepared prior to first occupation to demonstrate how the connection would be delivered. This must be developed in consultation with LB Enfield Parks.

18. Heritage Enhancements:

- a. To prepare a Landscape Management Plan for Trent Park, in consultation with LB Enfield Parks and Berkeley. The plan should cover:
- Legacy planting to the Cemetery boundary;
 - Obligation to provide enhancement the entrance of London Outer Orbital Path (LOOP), including landscape works, adjacent to the application site;
 - Obligation to provide Public art works which could be implemented that respond to the historic landscape;
 - Obligation to provide an Arboricultural Management Plan of the application site;
 - Additional tree planting and tree management (informed by Arboricultural Management Plan) of the tree belt surrounding the application site; and
 - Obligation to provide Interpretation signage to the entrances to Trent Park adjacent to the application site [up to £25,000].
- b. Obligation to provide Heritage interpretation scheme beside Cockfosters Station.

19. Other:

- a. Financial contributions to be index-linked;
- b. Considerate Constructors Scheme - not to Implement unless and until the development has been registered with the Considerate Constructor's Scheme and sufficient evidence of this has been provided to the Council; and
- c. LBE monitoring fee (max 5% of financial contributions payable to LBE).

3. SITE AND SURROUNDINGS

Site Overview

- 3.1 The site covers a total area of approximately 1.36 hectares and comprises the

existing station car park with London Underground Ltd (LUL) staff and Train Drivers' Accommodation (TDA) building, which lies to the rear of Cockfosters Underground Station (Site A) and a second piece of land fronting Cockfosters Road (Site B) as shown in **Figure 1** below.

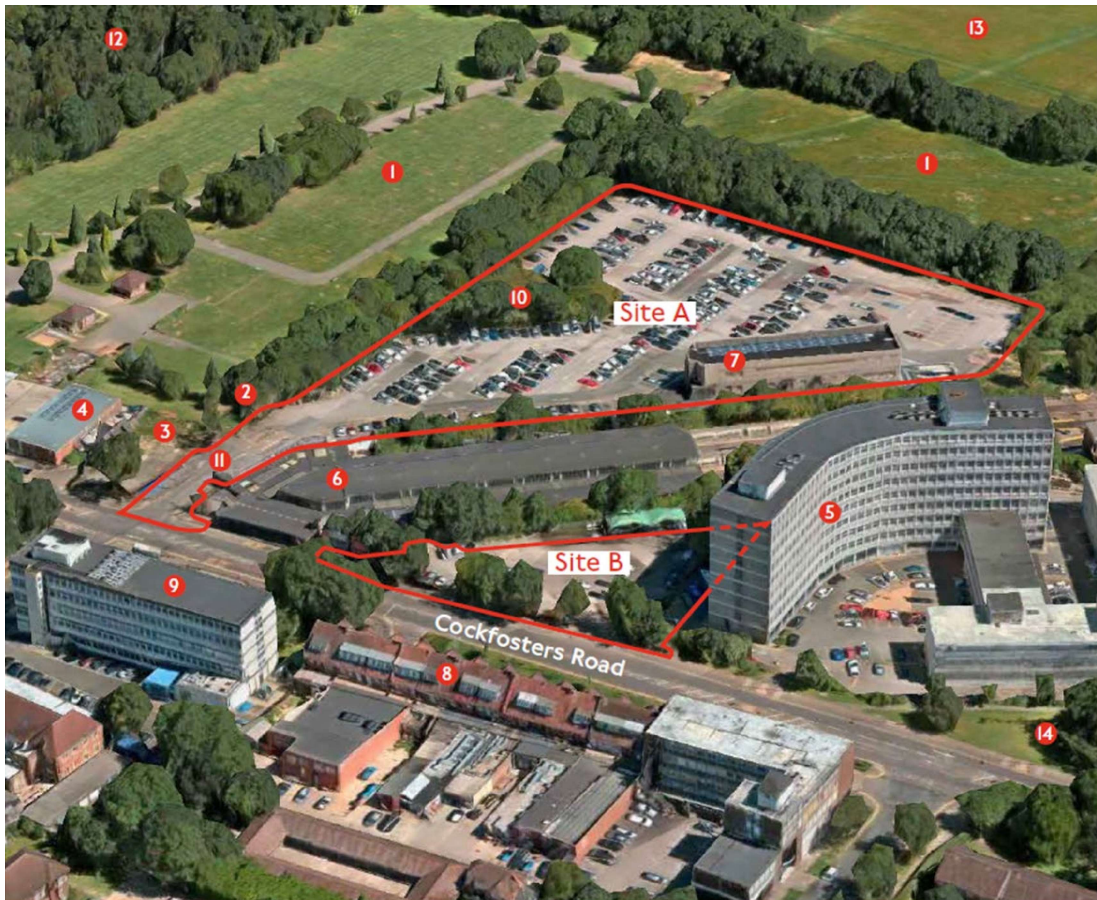


Figure 1 – Aerial view of application site

3.2 The site is located to the north and south of Cockfosters Underground Station, at the start / end of the Piccadilly line. The railway cuts through the centre of the site, separating the two car parks. The existing station car parks contain 407 car parking spaces, including 37 car parking spaces for LUL staff and train drivers and 12 blue badge holder spaces; and 8 cycle parking spaces. The site has a public transport accessibility level (PTAL) of 3-4 with Piccadilly line services (every 3 minutes in peak hours) and is serviced by the following bus routes (298, 299, 384, 610, 611, 692, 699 and N91).

Site A

3.3 Site A is approximately 1.15 hectares in size and is located to the east of the Station and railway tracks. It is currently in use as a car park for the Station providing 322 general public spaces and 12 spaces for blue badge holders. A further 25 spaces are also provided for LUL associated staff. A two-storey LUL staff and TDA building is located close to the western boundary with the railway tracks.

3.4 A triangular vegetated area located towards the northern boundary is designated as Local Open Space and a Priority Habitat (deciduous woodland) as shown in **Figure 2**

below. Vehicular and pedestrian access is from Cockfosters Road just to the north of the Station.

Site B

- 3.5 Site B is approximately 0.21 hectares in size and located adjacent to the south of the Station fronting Cockfosters Road, opposite an existing parade of shops (Cockfosters Parade). The site is currently in use as a hand car wash and a car park. The car park contains 48 spaces, 12 of which are used by LUL staff. Vehicular and pedestrian access is from Cockfosters Road just to the south of Site B.

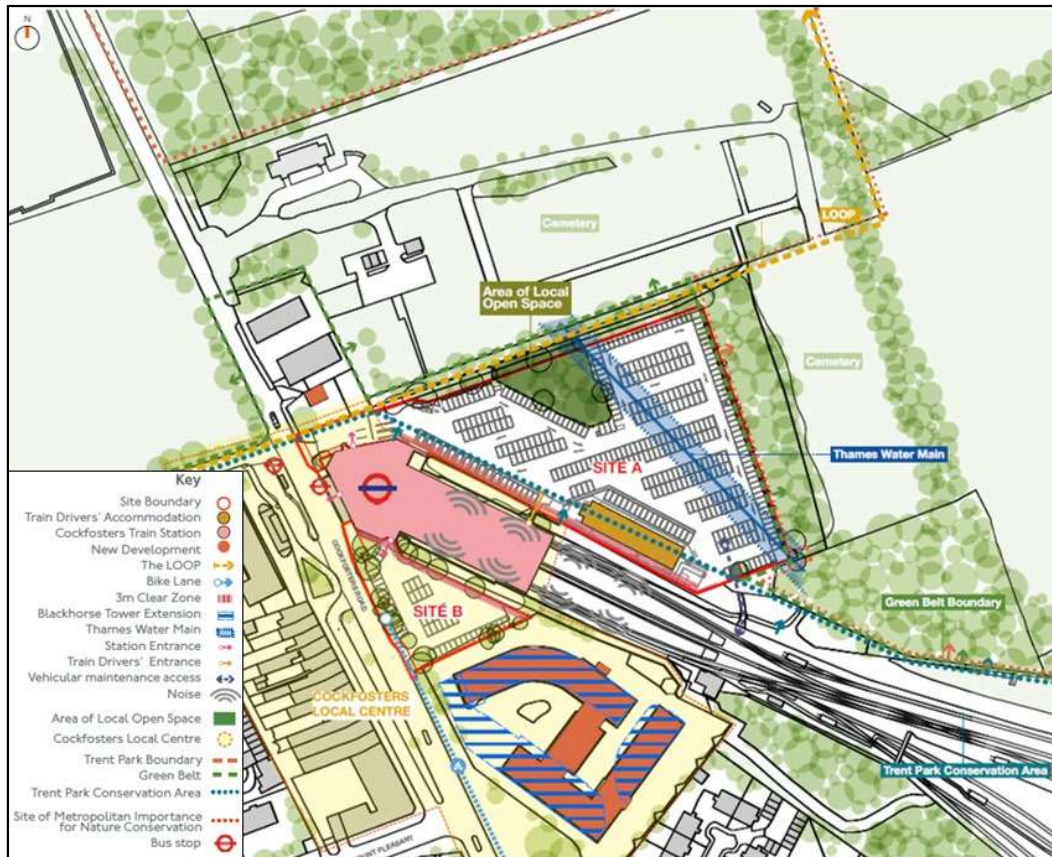


Figure 2 – Site and surrounding designations

Site Surroundings

- 3.6 The area surrounding the site is mixed in character, with the commercial and residential centre of Cockfosters extending to the south and west of the site with open space to the north.
- 3.7 The Station is a Grade II listed underground station designed by architect Charles Holden circa 1933 as part of the extension to the Finsbury Park Underground line. Stylistically the building is designed in a modern European style predominantly in brick, glass and reinforced concrete. Internally, there is a 'prow' shaped booking hall and train shed with glazed roof which cants inwards above platform canopies to form a clerestory above the central track. The station has three tracks with four platforms; the central track being served from both sides by platforms 2 and 3.

- 3.8 Over the platforms, cantilevered canopies are supported by portal frames of narrow 'blade-like' concrete columns and beams that rise from the platforms and span across the tracks. The building retains its original light fittings, signs, etc. The station is a landmark in the area and features an impressive interior space. Holden's designs brought rational modern continental design to a wider British public and introduced the idea of image branding to buildings when this concept was still in its infancy. Structurally the building consists of a reinforced-concrete loadbearing frame with brick infill. The frame is clad in Buckinghamshire red and Staffordshire brindled blue brick with flat concrete slab roofs.
- 3.9 Site A is adjoined by Trent Park Cemetery to the north and east and sits within the Trent Park Conservation Area; an Area of Special Character associated with Trent Park and Camlet Moated Site Archaeological Priority Area. To the east of Site A, is an area designated as a Site of Metropolitan Importance for Nature Conservation, and to the south west, running along the edge of the railway tracks, is a designated Site of Borough Importance for Nature Conservation. A wildlife corridor runs along the railway tracks near to the site. Two trees with Tree Preservation Orders (TPOs) are found to the north of the entrance to Site A, within the garden of 120 Cockfosters Road.
- 3.10 Along the northern boundary runs the London Outer Orbital Path (LOOP), a footpath extending the perimeter of outer London. The access to this footpath is from within Site A, opposite the northern entrance to the station. Adjacent to the site and demarcated by the northern and eastern boundaries is designated Green Belt which incorporates Trent Park. The historic landscape of the Grade II registered Park and Garden of Trent Park lies around 150m north of the site.
- 3.11 Development along Cockfosters Road predominantly comprises office development interspersed with ground floor retail use with residential properties above. Site B and the Station building form part of the Cockfosters Local Centre designation which incorporates the high street along Cockfosters Road. The buildings along the high street are predominantly between two and five storeys in height interspersed with taller elements.
- 3.12 Adjacent to the south east of the site is a nine-storey building known as Blackhorse Tower. There is a resolution to grant planning permission (ref. 16/04133/FUL) for proposals to extend Blackhorse Tower by an additional storey, bringing it up to ten storeys (31.5m above ground level) and for additional floorspace fronting Cockfosters Road. Work is currently underway on this site as part of a recently granted prior approval application (ref 21/02222/PRJ) to convert the existing commercial building into 216 new residential units.

4. PROPOSAL

- 4.1 The application proposal would comprise the erection of four Built-to-Rent blocks ranging in height from 5 to 14 storeys and comprising 351 residential units (211 x 1-bedroom; 105 x 2-bedroom; and 35 x 3-bedroom units).

4.2 The four buildings, as shown in **Figure 3** below, would have the following storey heights and residential unit numbers:

- Block 1 (The Pavilion), Site A: part 5, part 6, part 13-storeys (88 units)
- Block 2 (Station Mansion), Site A: part 5, part 13-storeys (94 units)
- Block 3 (Trent Mansion), Site A: part 6, part 14-storeys (107 units)
- Block 4 (Station House), Site B: part 5, part 13-storeys (62 units)



Figure 3 – Proposed building heights and scale

4.3 There would be a flexible retail (Class E and/or drinking establishment (Sui Generis) unit of 209sqm and a public cycle hub with 60 cycle spaces provided on the ground floor of Block 4 fronting Cockfosters Road. The existing London Underground and Train Drivers Accommodation (Sui Generis) would be re-provided at ground and lower ground floor basement levels (715sqm) within Block 3 as shown in **Figure 4** below.

4.4 The proposal includes 132 affordable housing units (40% affordable housing by habitable room and 37.6% by unit) to be provided within Blocks 1 (88 units) and 3 (44 units) and offered at Discounted Market Rent and London Living Rent equivalent levels. The remainder of the homes within the development would be for open market rent.

4.5 The proposal would include a residential communal amenity space area (440sqm), comprising a residents' lounge, concierge and gym, on the ground floor of Block 2 that would be accessible to all residents. A 318sqm terrace on the roof of Block 2 would also be provided, and 4,200sqm of outdoor amenity space that would also be publicly accessible at ground level. The latter would include 300sqm of doorstep play space for 0-5s, 250sqm of play space for 5-11-year-olds and a further 650sqm of

incidental play space for all ages. 80sqm of play space for the 12+ age group is also to be provided on site, with further provision available off-site within Trent Park.

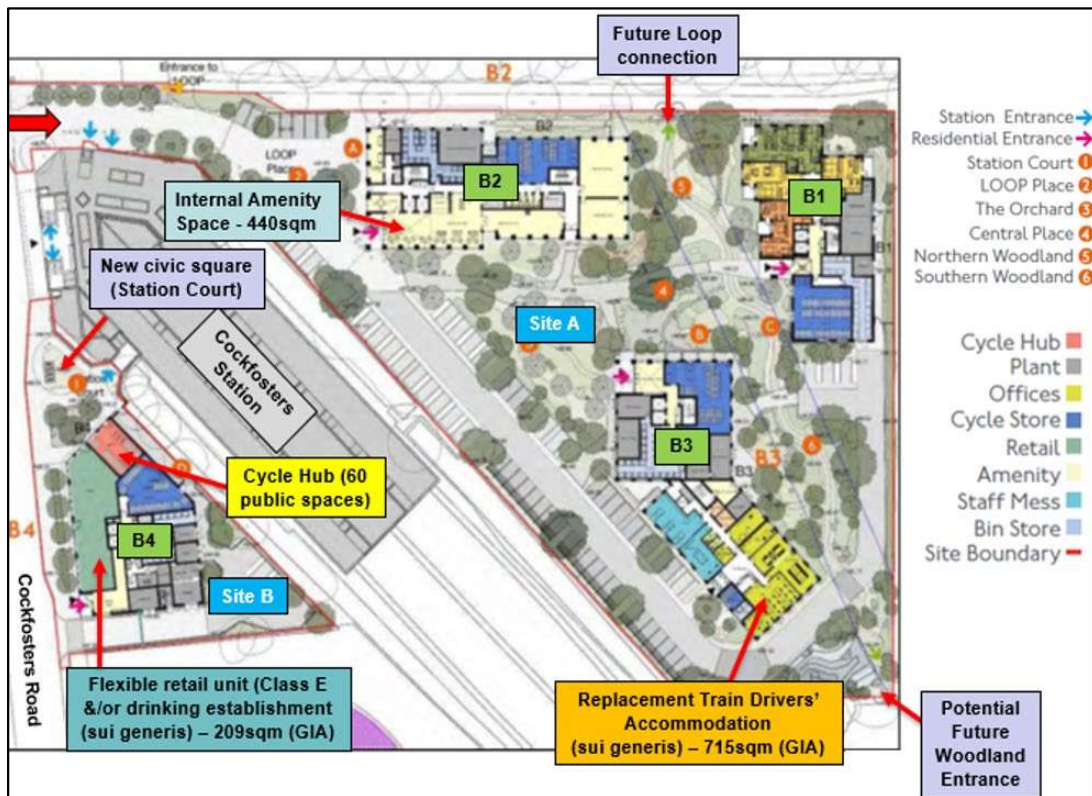


Figure 4 – Proposed ground floor plan

- 4.6 The development would create new public spaces on both Site A and Site B, including new tree planting, soft landscape and public realm areas and seating. Within Site A, a new link to the LOOP would be provided in the northern boundary together with areas of publicly accessible public realm and open space. Within Site B, a new area of public realm (Station Court) is also proposed close to the secondary pedestrian access to the station facing Cockfosters Road.
- 4.7 The residential part of the development would be car free, with the exception of 11 blue badge residential spaces (3% of the total number of homes), 9 of which would be provided on Site A and 2 on Site B. The landscape scheme has been designed to allow for this provision to be extended by 24 residential blue badge spaces (10% in total, or a further 7%) up to 35 spaces in total, should the demand arise.
- 4.8 The development would also provide a total of 47 publicly accessible car parking spaces on Site A. This would comprise 35 general use spaces and re-provision of the existing 12 blue badge spaces. A drop off/pick-up area comprising 7 spaces in close proximity to the station entrance and the new step-free access to the station proposed would also be provided. One blue badge car parking space is proposed for LUL staff. A designated car club bay is also proposed for use by residents and the local community and a taxi charging space to replace the existing.
- 4.9 The proposal also includes 607 new residential cycle spaces (597 long stay residential cycle parking spaces to be provided within the ground floor of the four

buildings and 10 residential short stay cycle parking spaces outside the buildings) and the re-provision of the existing 8 cycle parking spaces for those accessing the station. A further 60 spaces are to be provided within a dedicated, secure cycle hub on the ground floor of Block 4, adjacent to the entrance to the station for use by commuters. Cycle storage provision would also be made for LUL staff with 22 spaces being re-provided within the basement of Block 3 and 8 further commercial cycle spaces (6 short-term and 2 long-stay) located to the rear of the Station and within Station Court.

4.10 In summary, the proposal, as shown in **Table 1** below, includes the following:

Use	Amount
Site Area	1.36ha (1.15ha Site A; 0.21ha Site B)
Residential (C3)	351 units
Flexible unit (Class E and/or Sui Generis uses)	209sqm (GIA)
LUL staff & TDA (Sui Generis)	715sqm (GIA)
Density	258 units/ha
Car Parking	<ul style="list-style-type: none"> • 35 general use spaces for the public • 12 public blue badge spaces (reprovision) • 7 drop-off/pick-up spaces for the public • 11 blue badge spaces for residents (with passive provision for further 7% (24 spaces)/ 10% total (35)) • 1 car club space for residents and the Public • 1 LUL blue badge space • 1 taxi electric charging bay
Cycle Parking	<ul style="list-style-type: none"> • 597 long stay residential spaces • 10 short-stay residential spaces • 8 short-stay public spaces (re-provided) • 60 cycle hub spaces (public) • 2 long-stay commercial space • 6 short-stay commercial spaces • 22 re-provided LUL staff cycle spaces (in TDA)
External Private Communal Amenity Space	318sqm in terrace Block 02
External Public Communal Amenity Space	4,200sqm
Internal Communal Amenity Space	440sqm

Table 1 – Summary of application proposal

Pre-submission Applicant-led Engagement

- 4.11 The scheme was subject to extensive pre-application discussion and engagement. The pre-application engagement included meetings and workshops with Council officers, independent design review by Enfield Design Review Panel, presentation to Planning Committee at pre-application stage (a Technical Briefing), stakeholder engagement and public consultation and engagement. The scheme proposals have evolved during the course of negotiations with the applicants (including during pre-application stages) in response to comments.
- 4.12 A Statement of Community Involvement (SCI) has been submitted as part of the application to demonstrate how they engaged with the local community. The SCI states that the programme of consultation ran from April 2019 to June 2021 and included meetings with political stakeholders; meetings with key community groups; a 'Meet the Team' event; one public consultation over 2-days; and various electronic and non-electronic (leaflets and posters) communication. This shows the applicant has made robust efforts to engage with local residents, businesses and stakeholders to try and address questions, queries and concerns in relation to the proposal.

Technical Briefing

- 4.13 A Technical Briefing with Planning Committee Members was held on 3rd March 2020. The purpose of the Briefing was to provide an overview of the scheme to date however the Briefing was not a forum for discussion of the proposal. The briefing was well attended by Members.

Changes Post Submission

- 4.14 Some revisions have been made to the scheme during the assessment of the application. These revisions have comprised as follows:

Ground floor layout

- Amendment to the ground floor arrangement of Blocks 1 and 3 to increase the amount of active frontage by switching the position of the bike stores with the less active plant and bin stores to increase passive surveillance.
- Introduction of amenity / co-working space to the elevation of Block 2 facing LOOP Place to increase activation and passive surveillance.
- Amendments to the cycle store of Block 4 to improve access for residents by adding a door off of the main lobby.

Residential layout

- Rearrangement of internal layouts in Blocks to improve daylight levels (12 additional habitable rooms now meeting BRE recommendations for ADF).
- Reduction in the number of single aspect north facing units from 7.4% to 3.4%.

Landscape

- Amendment of Station Square to include a more animated public realm and to strengthen its civic character.

- Revision to Loop Place and entrance to provide a more active and pedestrian-priority environment with clarified access to the London Loop, and the vehicle access route.

Heritage and townscape

- Ten additional verified views have been provided to further consider the impact of the development on heritage and townscape.

4.15 All of the above matters are discussed further in the main body of the report below.

5. RELEVANT PLANNING DECISIONS

5.1 The following planning decisions are relevant to the site and surrounding area:

Application site

- 5.2 In April 2014, a Prior Approval application was granted for the erection of a 2-storey building to provide train crew facility together with provision of associated car parking and ancillary works (application reference P14-00931PRI).
- 5.3 In October 2019, an EIA Screening Opinion Request was made to the Council to establish whether the proposed works would constitute EIA development as assessed against Regulation 6(1) of the EIA Regulations. The Council agreed that the Development did not constitute EIA development (application reference 19/03416/SO).

Neighbouring sites

Cockfosters Station

- 5.4 In February and March 2019, a Listed Building Consent application was approved for the installation of a lift shaft and canopy (application reference 18/04894/LBC) and an application for lesser works for the installation of a lift shaft and canopy (application reference 18/04894/LBC). These works to the secondary exit to the Station leading directly into Site A have now been completed.

Blackhorse Tower, Holbrook House and Churchwood House, 116 Cockfosters Road

- 5.5 In February 2017, an application for change of use to residential (164 units) including an additional storey received a resolution to grant by the Council's Planning Committee (application reference 16/04133/FUL). The proposals involve basement and surface car parking, refurbishment of Blackhorse Tower and the addition of an extra floor which will provide 88 residential units. Holbrook House and Churchwood House will be demolished, and two new blocks will be constructed, one of 7 storeys (44 residential units) and one of part 7, part 4 storeys (part 64-bed hotel, part 32 residential units with flexible uses at ground and first floor levels). The proposals involve an increase in height by one storey (3.9 metres) to the existing 9 storey building. This application is still pending and has not yet been determined.

- 5.6 In May 2021, a Prior Approval application was granted for change of use from offices (B1(a)) to residential (C3) to provide 219 residential units within the buildings of Blackhorse Tower, Holbrook House And Churchwood House, 116 Cockfosters Road and land within its curtilage for associated use. (application reference 21/01096/PRJ). This proposal has not been implemented.
- 5.7 In July 2021, a Planning application was approved for the removal and replacement of existing facades and fenestration, including raising of parapet and plant room roofs, introduction of rooftop gardens with associated balustrading and access routes and enclosure of ground floor areas (application reference 21/01607/FUL). This proposal has not yet been implemented.
- 5.8 In July 2021, a Prior Approval application was granted for change of use from offices (B1(a)) to residential (C3) to provide 216 residential units within the buildings of Blackhorse Tower, Holbrook House And Churchwood House, 116 Cockfosters Road and land within its curtilage for associated use (application reference 21/02222/PRJ). This proposal has been commenced on site and works are currently underway.

Trent Park Cemetery

- 5.9 In November 2015, a planning application was approved for change of use from amenity grassland to lawn cemetery extension to the south east of the existing cemetery (application reference 15/03331/FUL). This site is located to the east of the site and the works are currently underway.

120 Cockfosters Road (Former Trent Boys School House)

- 5.10 In August 2018, a planning application was approved for the erection of a part single, part 2 storey building with a basement level to provide offices, together with courtyard, associated landscaping and parking (application reference 18/01952/FUL). This proposal has been commenced on site and works are currently underway.

Former Middlesex University Trent Park

- 5.11 In October 2017, a planning application was approved for the phased redevelopment of the site to provide 262 residential units with museum, café and leisure uses (application reference 16/04324/FUL). This was accompanied by a Listed Building Consent application for the demolition of extensions to Mansion House and to the Orangery involving restoration (application reference 16/04375/LBD). These proposals have commenced on site and works are currently underway.

6. CONSULTATIONS

- 6.1 In November 2015, the Council adopted a Statement of Community Involvement (SCI), which sets out policy for involving the community in the preparation, alteration and review of planning policy documents and in deciding planning applications.
- 6.2 Paragraph 3.1.1 of the adopted version sets out the expectation of the Council: *“the Council aims to involve the community as a whole: to extend an open invitation to*

participate but at the same time ensure that consultation is representative of the population. To achieve this, a variety of community involvement methods will need to be used. Targeted consultation of stakeholders and interest groups, depending upon their expertise and interest and the nature and content of the Local Plan documents, or type of planning application, will be undertaken.”

6.3 Paragraph 5.3.6 goes on to state: “*in the case of ‘significant applications’, additional consultation will be carried out depending upon the proposal and site circumstances: Developers will be encouraged to provide the community with information and updates on large scale or phased developments using websites, public exhibitions and newsletters”*. As noted above, the Applicant undertook pre-submission engagement.

6.4 The following consultation responses have been received as summarised below:

Statutory and External Consultees

The Greater London Authority (GLA) (Response dated 20/09/21)

6.5 The GLA have made the following Stage 1 response on the original scheme:

- **Land use principle:** The residential-led redevelopment of this brownfield site would contribute towards meeting the housing targets of Enfield Council and therefore the proposed land uses are acceptable.
- **Housing:** All the residential units will be provided as Built to Rent. 40% affordable housing by habitable room with 30% of the Discount Market Rent (DMR) units set at levels equivalent to London Living Rent (LLR) and 70% at rents at an average of 65-70% of Open Market Rent is proposed. The scheme could be eligible for the Fast Track Route, subject to confirmation of the final tenure split. The final rent level assumptions and income thresholds should be secured by the Council. Appropriate review mechanisms should also be secured in the S106 agreement.
- **Urban design/Green Belt:** The site is not identified in the development plan as suitable for tall buildings and, as such, the proposal does not comply with London Plan Policy D9.B. The issue of non-compliance will be assessed at the Mayor’s decision-making stage. The response to the visual impact on the Green Belt is supported in strategic planning terms. Public access to the open space should be appropriately secured.
- **Heritage:** The proposal would result in less than substantial harm to the setting of the Grade II listed Cockfosters Underground Station, Grade II registered Trent Park and Trent Park Conservation Area. At this stage, it is considered that the public benefits in terms of public realm improvements and provision of affordable housing could outweigh the identified harm.

- **Transport:** Provision of cycle parking, pedestrian and public realm safety improvements and electric vehicle charging points, including appropriate conditions and obligation should be secured.
- **Sustainable infrastructure:** Further information on air quality is required. Further information is required on energy with respect to energy efficiency, renewable energy, overheating and energy monitoring. Further information in relation to Whole Life Cycle Carbon Assessment is required.
- **Green infrastructure and natural environment:** The proposed development is compliant with green infrastructure policy and presents a well-considered scheme where urban greening opportunities have been maximised. However, further clarification is required in relation to mitigation measures secured in relation to the impact on the adjacent SINC.

Officer Comment: the GLA provided further comments on 6 December 2021 clarifying the further information required in relation to air quality, energy, Whole Life Cycle Carbon Assessment and Green infrastructure. The applicant has provided this information to both the Council and GLA and Officers consider this addresses the above outstanding matters raised. The Council has sought confirmation from the GLA that these matters have now been addressed. The GLA will provide final comment on these in their Stage 2 response.

Health and Safety Executive (Response dated 24/11/21)

- 6.6 This application does not fall within any HSE consultation zones. There is therefore no need to consult the HSE Land Use Planning (LUP) team on this planning application and the HSE LUP team has no comment to make

Historic England (GLAAS) (Response dated 22 July 2021)

- 6.7 Recommend no archaeological requirement. The proposal is unlikely to have a significant effect on heritage assets of archaeological interest. The desk-based assessment provided with the application suggests there is a low potential for archaeological remains of low significance with an overall low risk to archaeological remains. No further assessment or conditions are therefore necessary.

Historic England (Responses dated 29/07/21 and 22/11/21)

- 6.8 The proposals cause harm to the setting of Trent Park Conservation Area and Registered Park and Garden. As such, it is recommended that the proposed harm is clearly justified and where possible, reduced or mitigated through amendments to the scheme and S106 agreement to meet the requirements of the NPPF.

Officer Comment: whilst raising concerns, Historic England (HE) has not formally objected to the proposal. The Council's Conservation and Heritage team has provided HE with the justification for the proposed harm identified and the proposed public benefits and mitigation measures to be secured by s106 that would outweigh that harm as identified in this report. Any further response received from HE will be

reported to Committee.

London Underground (Responses dated 21/07/21 and 22/11/21)

- 6.9 No objection subject to the applicant fulfilling their obligations to London Underground and Transport for London under the legal requirements between ourselves and the promoter of the development.

Natural England (Responses dated 28/07/21 and 29/11/21)

- 6.10 No objection. No comments to make on the application.

Thames Water (Response dated 15/07/21)

- 6.11 No objection subject to a piling condition and informatives relating to public sewer discharge, flooding and damage being attached to any permission granted.

- 6.12 Environment Agency: No comments received.

- 6.13 National Planning Casework Unit: No comments received.

- 6.14 London Fire and Emergency Planning: No comments received.

Sport England (Responses dated 21/07/21 and 16/11/21)

- 6.15 No objection. The site is not considered to form part of or constitute a playing field as defined by the Town and Country Planning (Development Management Procedure) (England) Order 2015 (Statutory Instrument 2015 No. 595), therefore Sport England has considered this a non-statutory consultation.

The proposal will generate demand for sporting provision. The existing provision within the area may not be able to accommodate this increased demand without exacerbating existing and/or predicted future deficiencies. Therefore, Sport England considers that new developments should contribute towards meeting the demand that they generate through the provision of on-site facilities and/or providing additional capacity off-site. The level and nature of any provision should be informed by a robust evidence base such as the Council's Playing Pitch Strategy or another relevant robust and up-to-date needs assessment.

Sport England would encourage the Council to consider the sporting needs arising from the development as well as the needs identified in its Playing Pitch Strategy and/or any other robust borough wide sport facility strategy and secure s106 or CIL funds to deliver new and improved facilities for sport based on the priorities identified in those documents.

Officer comment: The open space and recreational space proposed with the site and neighbouring Trent Park are considered sufficient to meet any increase in demand for sporting provision that may arise. As such, it is not considered necessary for a financial contribution towards new sporting provision to be secured by s106.

London Borough of Barnet (Response received 10/11/21)

6.16 Objection to the proposal for the following reasons:

'The development would result in the removal of existing commuter car parks on the site and could, therefore, without mitigation result in an unacceptable impact on highway conditions within the London Borough of Barnet as a result of displaced commuter car parking. The proposal also fails to identify or propose any mitigation measures to account for the increased pressures that would be likely to result on key infrastructure within the London Borough of Barnet, such as the demand on Barnet school places'.

Officer Comment: the loss of the existing car parks; the potential for displacement of car parking into the surrounding roads within the London Borough of Barnet; and the impact on key infrastructure, such as schools and health, are fully considered within the 'Transport, Access, Servicing and Parking', 'Education' and 'Health' sections of the report below.

Better Streets for Enfield (Response received 14/08/21)

6.17 Support for the proposal for the following reasons:

- The proposal is a car-free development (other than for blue badge holders) that still provides future residents with good transport options.
- In favour of controlled parking zones on all streets within ten minutes walk from the station, to discourage drivers from outside the Cockfosters area from driving there to use the station and parking on residential streets.
- Reducing car usage in favour of active travel (walking, cycling and using public transport) is an important part of the Mayor of London's transport strategy and is also in line with Enfield Council's policies.
- Reducing car parking capacity for people using the Piccadilly Line, and in conjunction with CPZs, will reduce the amount of traffic in the area and cause less congestion.
- For passengers living closer to the station, rather than driving and contributing to congestion, poor air quality and road danger, the proposal promotes healthier options of walking and cycling.
- Instead of providing car parking spaces for residents, the proposals include generous provisions for residents to store bicycles in secure and easily accessible locations within their buildings and a car club.
- The proposal includes public realm enhancement plans, including providing a more visible entrance to the London Loop footpath, which currently runs through the car park and is difficult to find. Passengers arriving at the station would have easier access to the wonderful Trent Park without having to walk along the busy and polluted A111 to the main entrance.

6.18 Commercial Waste Services: No comments received.

6.19 Energetik: No comments received.

6.20 Enfield Disablement Society: No comments received.

6.21 Islington and Camden Cemetery Services: No comments received.

Metropolitan Police Designing Out Crime Service (Responses received 26/07/21 & 29/11/21)

6.22 No objection subject to Secured by Design condition being attached to any permission granted.

NHS London Healthy Urban Development Unit (Response received 30/07/21)

6.23 No objection. The proposed development will have an impact on local healthcare services. The submitted Health Impact Assessment addresses the impact on primary care services. The HIA estimates that 626 residents will live on site, generating a need for 0.35 FTE GPs (based on a ratio of 1 FTE per 1,800 patients). Paragraph 4.27 of the HIA notes that local GP capacity is constrained and that there are plans to increase capacity in the local area. The closest three practices - Cockfosters Medical Centre, Oakwood Medical Centre and Southgate Surgery have no surplus capacity as measured by the FTE GP per patient ratio which exceeds the planning standard. These practices are part of the Enfield Unity Partners Primary Care Network (PCN) and the requirement to provide additional PCN services will place further pressure on workforce and estate capacity. Paragraph 4.27 of the HIA concludes that s106 contributions are needed to improve health infrastructure to mitigate the impact of the proposed development.

The Council's Section 106 Supplementary Planning Document (2016) advocates the use of the HUDU Planning Contributions Model to calculate a s106 contribution to help mitigate the impact of the development. Based on the housing mix stated in paragraph 5.4 of the Planning Statement, the model calculates a primary healthcare s106 requirement of £179,800. It is envisaged that the s106 contribution would be spent on increasing the capacity of local GP premises within the Enfield Unity Partners Primary Care Network.

Officer Comment: a contribution of £179,800 towards primary healthcare is to be secured by S106 legal agreement as discussed in the 'Health' section of the report below.

6.24 North Middlesex Hospital NHS Trust: No comments received.

Design Review Panel (Response received 17/09/21)

6.25 The scheme was presented to Enfield's Design Review Panel (DRP) in September and December 2019 and most recently in September 2021. The DRP meetings followed from a series of pre-application meetings where the Council's design and planning officers discussed the overall site layout; quantum of housing; residential design quality; bulk, scale and height of the development.

6.26 At the most recent DRP held in September 2021, the panel welcomed the progress

of the scheme, the response to previous comments and broadly supported the scheme. In summary, the DRP asked that the following matters below be considered:

- The landscape approach of one that bleeds in, out and around the site is a key design principle that currently is not being fully implemented due to parking dominance and design of the entrance to Site A. Furthermore, the public realm facing the underground station should be considered a 'civic' area, rather than a landscaped space.
- The panel considers that the impact of the scheme to the sensitive settings of the Conservation Area and Green Belt is managed carefully. How height is assessed in this context, and whether hierarchy of massing in a tower trio should be considered appropriate, has been debated. The applicant is advised to determine how visible and proud a feature the crowns should be, as well as how frontages to the cemetery manage the impact of the proposed scale.
- Liveability in the scheme is impacted by a suboptimal delivery of dual aspect housing and blocks with long corridors. Learning from the pandemic means designing for an internal residential quality that the planform does not provide for all dwellings. At ground level, the inactive frontages and design of communal areas should aid in contributing to the activation of a new communal open space in the heart of the development.

Officer comment: the applicant has considered the above advice and incorporated amendments to the scheme including the incorporation of a more civic public realm area facing the station; a reduction in the number of single aspect units; the incorporation of more active frontages at ground floor level; provided clarification on the intended use of the communal open space; and considered further the impact of the building crowns and facades on the height and scale of development proposed.

Planning Committee Pre-application / Technical Briefing

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

Members of Parliament, London Assembly Member and Councillor Consultation

Theresa Villiers MP: Member of Parliament for Chipping Barnet (Responses received 09/08/21 and 26/11/21)

- 6.28 Objection to the proposal for the following reasons:

- The application is out of scale and character with the surrounding area.
- The location is not suitable for tall buildings.
- The development does not address Enfield's main housing needs with three-bed 'family' units constitute less than a tenth of the proposals.
- Amenity space for residents and the public would be inadequate, particularly for families.

- The proposal will irreparably harm the Trent Park Conservation Area and important heritage assets in close proximity.
- The proposal would have a visually intrusive impact on views from the Cockfosters ridgeline, and be visible for miles around.
- The development would almost completely remove park-and-ride facilities and reduce access to public transport.
- The proposal contravenes equality rules including Enfield Council's duties under the Equalities Act 2010. The retention of a few disabled spaces is not sufficient because the loss of the rest of the car park means disabled people will lose the option to use a regular space when disabled bays are full.
- The proposal will adversely impact on local infrastructure, such as schools, GP surgeries and hospitals, which is already under pressure and does not have sufficient capacity for the scale of the population increase proposed.
- Inadequate provision of resident parking.

Officer Comment: a joint objection has been submitted with Cllr Felix Byers and Cllr Nicole Richer from LB Barnet. The above concerns raised are addressed in the relevant sections of the report below.

Bambos Charalambous MP: Member of Parliament for Enfield Southgate (Response received 04/08/21)

6.29 Objection to the proposals for the following reasons:

- Overdevelopment of this site.
- Significant alteration in the character of the Cockfosters area, an area which is largely of low-rise suburban housing and green spaces, including Trent Park.
- The proposal would substantially change the character of the local area and further exacerbate the potential issues facing the local community. The proposed height and mass of the development and visual impact on the immediate area would be significant and detrimental to the local built environment.
- There will inevitably be an impact on stretched local services, including schools and doctors, which should be taken into consideration.
- The proposal does not address local housing needs. There is a critical shortage of family sized homes in Enfield but only 140 of the homes are described as 'family sized' and only 35 of those are three bedroomed.
- Impact on surrounding residential roads and the flow of traffic on Cockfosters Road, which is already regularly congested with local and through traffic heading out of London to the M25.
- Providing only limited parking for residents and significantly reduced parking for commuters risks congestion on the main road and surrounding residential areas, with impacts on the travel times of local buses.
- Cockfosters station car park, being at the end of the Piccadilly Line, currently provides useful access to the tube network for those in the surrounding areas who need to travel into London, an amenity which will be lost.

Officer Comment: The above concerns raised are addressed in the relevant sections of the report below.

6.30 Joanne McCartney AM London Assembly Member for Enfield and Haringey: No comments received.

6.31 Anne Clarke AM London Assembly Member for Barnet & Camden: No comments received.

Cllr Alessandro Georgiou (LB Enfield Ward Councillor) (Response received 12/08/21)

6.32 Objection to the proposal for the following reasons:

- A high-density scheme with tall buildings would be contrary to Policy DMD 43 and would blight the landscape, going well beyond the height of the existing Black Horse Tower.
- The development does not meet Enfield's housing needs and is not affordable for Enfield residents. In fact, it does the opposite and segregates residents with the affordable housing being housed in separate blocks. There are clearly not enough family homes proposed - the 3-bedroom flats only make up 9.9% of the scheme.
- The proposal will impact on local services (education and health services) which are already stretched in Cockfosters with no possible chance of expansion of the primary schools, secondary school or local GP practice.
- It will adversely impact on the Conservation Area, Greenbelt and neighbouring Heritage asset - Cockfosters Station is a Grade II listed building with great architectural significance.
- The loss of parking proposal will spell the end of much need parking for families, the disabled, the elderly, commuters and local shoppers. The existing 370 spaces are well used and much valued by the Cockfosters community. The retention of a miniscule amount of parking will do nothing to accommodate the needs of the groups mentioned above, in particular those with accessibility issues.
- The lack of parking provision for proposed residents within the scheme, rather than reducing car usage, will simply displace cars throughout the area inevitably leading to CPZs.
- The design is quiet simply ugly and out of keeping with the area.
- The proposal will adversely impact on the cemetery.
- The scheme would bring irreparable harm to Cockfosters and the many inner London families able to enjoy Cockfosters via the Tube and will ruin the lives of the many already living with Cockfosters and will set a dangerous precedent from which Enfield would never recover.

Officer Comment: The above concerns raised are addressed in the relevant sections of the report below.

Cllr Edward Smith (LB Enfield Ward Councillor) (Responses received 11/08/21 and 29/11/21)

6.33 Objection to the proposal for the following reasons:

- Gross overdevelopment of the site.

- The proposal conflicts with the requirements of the existing local plan regarding tall buildings.
- The housing mix does not conform to Enfield's housing needs either in terms of size or affordability. It does not meet the housing needs of the borough for larger units, nor comply with the London Plan in terms of the level of affordable housing.
- The removal of most of the existing public car parking spaces will have an adverse impact on many individuals with protected characteristics defined under Equalities Legislation.
- Adverse impact on the Trent Park Conservation Area and adjacent Green Belt.
- Loss of car parking will exacerbate traffic congestion and pollution and will disadvantage people in protected categories.
- Completely endorse the detailed objections submitted by CLARA and Bambos Charalambous MP.

Officer Comment: The above concerns raised are addressed in the relevant sections of the report below.

Cllr Elaine Hayward (LB Enfield Ward Councillor) (Response received 13/08/21)

6.34 Objection to the proposal for the following reasons:

- Fully endorse the objections Cllr Edward Smith and Cllr Alessandro Georgiou have raised and those submitted by CLARA and Bambos Charalambous MP.
- The proposal if implemented would be ruinous for the residents of Cockfosters.
- The station car park is currently used to capacity and there is very little further street parking available for commuters should it be built on. This would have a huge impact on the surrounding area. Residents already experience traffic and parking difficulties every day.
- Tall buildings in such close proximity to the Green Belt and within the Trent Park Conservation Area is contrary to current policy.
- This application does not address Enfield's housing needs in terms of size and affordability.

Officer Comment: The above concerns raised are addressed in the relevant sections of the report below.

Cllr Felix Byers (LB Barnet) (Response received 11/08/21)

6.35 Objection to the proposal for the reasons given by Theresa Villiers MP above.

Cllr Nicole Richer (LB Barnet)

6.36 Objection to the proposal for the reasons given by Theresa Villiers MP above.

Public/ Interest Group Consultation

6.37 The following public/interest group consultee responses have been received:

6.38 Objection to the proposal for the following reasons:

- The buildings are too dense and too tall and will damage Trent Park, a Listed Garden and Green Belt and several heritage assets, including the Station building which is Grade II Listed, the Trent Park Conservation Area and the character of Cockfosters. A case for tall buildings in this location has not been made and little weight should be attached to the emerging Local Plan.
- The proposal will impact on a number of views, including from the station platforms and that from Chalk Lane opposite the station.
- The development would not provide or meet the local housing Enfield needs.
- Affordable homes for Enfield families: there should be 50% affordable homes; 40% are proposed. None of the homes are truly affordable. The flats proposed are predominantly one-bed; the housing need in Enfield is for family homes.
- The loss of the car parks and the absence of residents parking: they will force, potentially, over 750 cars to park on the residential streets of Cockfosters, with all the associated road accident, congestion, air quality and amenity issues that entails.
- The proposal will include fails to meet housing standards in relation to units per core and single aspect units.
- The proposal fails to provide evacuation lifts.
- The energy strategy does not comply with the London Plan.
- There is an under provision of Playspace.
- The proposal may increase the opportunity for crime and anti-social behaviour at the site, putting its residents and users at risk with inadequate security measures being provided.
- The loss of the car park will make access to the station difficult for those with statutory protected characteristics: disabilities, the elderly etc.
- Overloading local services: no allowance has been made for the strain the development will put on the local infrastructure: schools, doctor's surgeries etc. Whilst a s106 contribution of £179,800 is offered, no details have been offered as to how in practice the additional demand will be met.
- Traffic chaos: the five-year construction period will cause chaos on the Cockfosters Road. The up to 750 cars displaced from the site prowling local residential streets for the few remaining parking spaces will be disruptive, dangerous and unsustainable. The narrow entrance will be used by cars and mini-cabs dropping-off at the station, access to the disabled lift, deliveries to the flats, cyclists, pedestrians and cars parking in the remaining spaces on site, all turning into an already congested Cockfosters Road opposite Chalk Lane and the buses turning from the bus layby. This is a recipe for traffic chaos both during construction and afterwards.
- Non-compliance with numerous planning policies that will seriously damage Cockfosters, causing harm to, amongst others: local residents; the many people who use the Piccadilly line to access Trent Park and the London Loop for their recreation, as well as local and further-a-field commuters; the bereaved visiting

Trent Park Cemetery from Camden and Islington; and local businesses, particularly during the construction period.

Officer Comment: The above concerns raised are addressed in the relevant sections of the report below.

Enfield Town Residents Association (Response dated 12/08/21)

6.39 Objection to the proposal for the following reasons:

- The proposal fails to deliver sufficient housing that is appropriate to that needed by the many families in acute housing need in Enfield, that is, homes with 3+ bedrooms.
- The proposal contains a very low number of units available at London Living Rent.
- The proposal also significantly impacts groups of residents and public transport users who should, in law, be protected by the provisions of the Equality Act and the Public Sector Equality Duty.
- The proposals will restrict access by residents of the borough to one of our outermost underground stations and, given that there is no onward train connection, to people living in Hertfordshire.
- The proposal will severely stress already stretched local infrastructure; there is no provision for additional GP surgeries, hospital beds or school places.
- The proposed development will be to the detriment of a significant conservation area, create problems for other residents in the area and negatively impact accessibility to the London Underground system.
- Lastly, the proposal represents significant departures from adopted policy, without those departures bringing any benefits to the community, indeed, quite the opposite: they very significantly and negatively impact the local community and of residents and travellers more widely.

Officer Comment: The above concerns raised are addressed in the relevant sections of the report below.

London and Middlesex Archaeological Society (Response received 16/09/21)

6.40 Objection to the proposal for the following reason:

- The tall buildings proposed in this application will dominate the station, changing utterly and damagingly the way in which it is appreciated. No attempt has been made to get the buildings to harmonise. The Committee therefore asks the Council to refuse this application and require a sensitive redesign, with human-sized dwellings.

Officer Comment: The above concerns raised are addressed in the relevant sections of the report below.

Twentieth Century Society (Response dated 10/08/21)

6.41 Objection to the proposal for the following reason:

- Harm caused to the setting of the Grade II listed Cockfosters Underground Station.
- The scale of the proposed development is too substantial and will overwhelm the single-storey station.
- The new residential blocks in site A will be highly visible in views of the station's entrance from Cockfosters Road and the proposed development will alter the character of the station's roofline and the sense of openness. The Society takes the view that development in this area should be kept low to respect the historic environment.

Officer Comment: The above concerns raised are addressed in the relevant sections of the report below.

Chase New Homes (Responses dated 18/08/21, 20/08/21 and 23/12/21 and responses from Irwin Mitchell LLP dated 02/08/21, 12/08/21 and 23/08/21)

6.42 Objection to the proposal for the following reasons:

- Notification of the application – it is unclear whether this departure application has been advertised correctly by way of site and press notices. The Council has not evidenced compliance with their notification obligations in respect of the application.
- The construction of tall buildings on the site is completely inappropriate and contrary to Policy DMD43 of the Local Plan.
- The design and character of the Development is inappropriate with new buildings of demonstrably increased height; massing; visual impact and harm.
- The design of the Development is out of keeping with the character of the area.
- Overdevelopment of the site. The density of the Development is grossly disproportionate (around seven times the norm for an outer suburb) and the height of the tower blocks far exceed our client's property and the "modest street presence" of the Station.
- Conservation and Heritage – the Development will lead to substantial harm to designated heritage assets.
- Green Belt - the proposed development is visually intrusive and dominant and will cause harm to the setting of the neighbouring Green Belt.
- Neighbour Amenity and Housing – the distance of the Development to the neighbouring proposed Blackhorse Tower Development is insufficient and will lead to loss of privacy to future occupiers.
- Transport – overspill of parking onto surrounding roads.
- Inadequate parking provision.
- Loss of parking.
- Increase in traffic.

Officer Comment: The above concerns raised are addressed in the relevant sections of the report below.

The Barnet Society (Responses received 31/07/21 and 06/12/202)

6.43 Objection to the proposal for the following reasons:

- The proposal is not of a high design or architectural quality that would celebrate the transition between this border of town and country.
- The new buildings are not worthy of the Grade II Listed Station Building and would loom over it in a domineering way, creating a ludicrous discrepancy of style and scale.
- The development would dominate views from Hadley Wood and Trent Park and miles beyond, including vantage points in Barnet. It would also interrupt views towards the Green Belt from numerous places, affecting the quality of outlook for thousands of residents.
- The proposal would dominate vistas across Trent Park and would damage both the Trent Park and Monken Hadley Conservation Areas.
- The towers would harm the setting of the Grade II registered park and garden of Trent Park.
- At around seven times the norm for an outer suburb, the proposed housing density is grossly disproportionate.
- The proposed massing is entirely out of character with the local shopping centre and its surrounding residential streets and would directly contravene the Council's adopted policy on tall buildings being widely visible and prominent in long distant views from hundreds of homes and streets in Barnet.
- The proposal would set a most unwelcome new benchmark for similar buildings to overwhelm other local town centres including those of High, New and East Barnet.
- The towers would be bulky and overbearing and would fail to respond to context or local character.
- The designs offer no response to the adjacent parkland and Green Belt.
- The removal of the car park would discourage car-sharing and other integrated transport solutions, and either displace cars onto local streets or impose CPZs on residential neighbourhoods.
- The loss of park-and-ride facilities would be particularly regrettable. Their users tend to be either essential workers – including tube staff – or more vulnerable people, all with justifiable concerns for personal safety. This will force residents who don't live near bus routes – many of whom have bought homes and built their lives around the convenience of the Cockfosters Station carpark – to drive further into London.
- The proposal would not meet local needs in terms of type or affordability. A greater variety including family homes, shared ownership and key workers should be provided, and management arrangements that discourage transient dwellers.
- The site is simply not suited to delivering large numbers of flatted dwellings.
- The proposal will impact on local services including schools, GP and dental surgeries.
- On a site as environmentally and ecologically sensitive as this, the scheme should achieve a greater carbon emission reduction than currently proposed beyond London Plan minimum standards

Officer Comment: The above concerns raised are addressed in the relevant sections of the report below.

East Barnet Residents' Association (Response received 16/08/21)

6.44 Objection to the proposal for the following reasons:

- Loss of car parks - many people depend on being able to drive to Cockfosters to access London. There are no bus services to Cockfosters from most of East Barnet and cycling or walking is not an option for the elderly or those with protected characteristics / disabilities. Removing the car parks discriminates against those people. With only a handful of spaces proposed to remain, residents would not be able to plan a journey whether for business, health, or social reasons because there would be no certainty of finding a parking space.
- Harm to Barnet roads - closing the car parks would displace commuter and other parking onto nearby roads, causing them severe problems and additional cost and inconvenience through the introduction of CPZs to attempt to control parking.
- Increase in congestion and even more gridlock in Cockfosters caused by new residents and delivery vans trying to find somewhere to park and people trying to drop off passengers at the station.
- The proposed blocks are hideous and are completely wrong for the quiet outer London suburb of Cockfosters. Building monstrous tower blocks on top of one of the highest ridges in north London would have an adverse visual impact to the beautiful park, green belt, and listed building adjoining this site.
- The proposal will lead to overcrowding putting intolerable pressure on the local infrastructure which is already beyond capacity.
- The unfortunate new residents would have very little amenity space - the proposed accommodation is completely unsuitable for families. Family homes are what Barnet and Enfield need, not tiny commuter flats.

Officer Comment: The above concerns raised are addressed in the relevant sections of the report below.

Federation of Enfield Residents & Allied Associations (Responses received 17/08/2021, 12/10/21 and 25/11/2021)

6.45 Objection to the proposal for the following reasons:

- The proposal seriously damages a vital public transport amenity and would materially impact many travellers over western Enfield and a wide area of north London.
- The scheme does not speak to Enfield's social and housing priorities. The urgent need for genuinely affordable family housing in Enfield will not be met with family accommodation accounting for just 35 units.
- Living on this development will be beyond the reach of average incomes, because Cockfosters is very high cost living, even with "affordability" concessions. Just 12% of units will be rentable at social rent levels, the

remainder at smaller discounts but still outside median incomes for most groups of front-line service workers. The majority of service personnel will be excluded, educational and health staff, shift workers and small families.

- The proposed site is too small and constricted to serve the proposed community of some 600+ residents to modern standards. The proposed housing density exceeds any comparable measure by several factors, is extraordinary and unacceptable, at 258 / ha.
- Cockfosters is not suited nor permissioned as a core site for the propagation of high-density low amenity tower developments - a retrograde step with potential serious social consequences.
- The proposal is not a social cohesive family supportive development and will deliver low social and economic value to Enfield.
- Site B is not fit for housing and has no amenities. Projections of a happy cohesive community split over two sites shared with the public are without realistic foundation.
- Social tensions are escalated when space is restricted and amenities few - the communal space here is nothing; pointing to Trent Country Park to provide recreational space (all year round!) is impractical and heartless, especially for young families requiring adult supervision. When summer months are taken over in the park by oversized commercial events the development will become swamped with revellers, a melee, so a no-go zone for residents.
- The site is isolated - effectively enclosed on all fronts and the development will result in a serious impediment to any family with children on health and safety grounds, noise, pollution and restrictions to movement off site degrade the living experience for all for sure. Especially if denied use of a car.
- The character of Cockfosters village and neighbourhood would be seriously impacted.
- The four towers are ugly and of depressingly poor quality, of density and configuration that breaks new ground for inhuman and unsocial accommodation, supported on a very small site by amenities in name alone.
- The scheme is strategically without redeeming merit and unsustainable.
- The proposal will have a lack of amenities and excessive density that could lead to social disorder and underachievement.
- The proposal will have an adverse impact on the setting of the listed Station building.
- The towers would be visible from all sensitive parts of the neighbourhood and parkland and detrimental to views and heritage and would be substantial and character changing adversely impacting conservation.
- The elevations would be massively intrusive on Cockfosters village and neighbouring protected Trent Country Park green belt and conservation area.
- The proposal is completely out of keeping with the suburban surroundings and not permitted under current Local Plan restrictions.
- There are safety concerns arising from the heavily trafficked but restricted site access.
- Lack of car parking for future residents.
- The loss of 370 existing public car parking spaces will stifle general use of the station, breach direct access to public transport for many, decant local commuter

parking into narrow neighbourhood streets or displacing to other stations in Enfield and increase commuter mileage.

- The space for blue badge parking will be nugatory (12 blue badge) and useless for the much wider group of disadvantaged or vulnerable travellers currently accommodated on site. There is insufficient space for protected travellers, which is of course discriminatory, inhumane and of arguable legality. The proposal will result in disenfranchising thousands of travellers, and a mobility impaired community.
- Full access to employment would be immeasurably impacted by loss of all-directions mobility. All front-line workers dependent on their cars, health visitors and trades persons operating from vans, an important sector in Enfield, will not be able to reside here, having no space for secure parking of their tools of trade.
- Asserting that cycling will be the transport access mode of the future has no basis in behavioural trends. Furthermore, cycle tracking to Cockfosters station is rudimentary to the east, and virtually non-existent north, south and west so cannot feature in any mature discussion on modes to access the station.
- Invocations to cycle are impractical and a cruel deception since cycling in London is not a practical mode, is high risk especially to women, of low salience, and will ever remain so.
- The cycle garaging provision proposed is of no practical value and destined to become a depot for scrap and waste, a disfigurement of the site and den for drug dealing. The provision of just 60 places provided for public use, replacing cars, indicates a huge falloff in station use – hardly a commendable outcome for a major transport authority.
- Public cycle parking rights on site are assumed to integrate with commanding ease, but conflict with residents is inevitable, leading to lowered cycle use.

Officer Comment: The above concerns raised are addressed in the relevant sections of the report below.

Ancient Monuments Society (Response received 04/08/21)

6.46 Objection to the proposal for the following reasons:

- The proposed height and bulky/blocky nature of the four proposed apartment buildings, being up to 14 storeys, are overbearing and dominate the low-slung station building and surrounds. Tall buildings in this location would cause a considerable degree of harm to the setting and significance of the grade II listed Cockfosters station building.
- The proposed buildings would appear prominent in views from within the registered Trent Park, particularly from Lime Avenue, and particularly dominant in views from Eastern Field in the adjacent nature reserve.
- The proposal fails to respond to the surrounding buildings and landscapes and would cause harm to the setting and character of the listed station building, adjoining Green Belt and grade II listed Trent Park.
- The loss of the commuter carpark on this site would result in a development for which there is arguably a negative public benefit, particularly when taking into consideration the additional negative impacts on the setting and significance of

the station, and the surrounding Green Belt and registered landscapes.

Officer Comment: The above concerns raised are addressed in the relevant sections of the report below.

The Enfield Society (Response received 05/08/21)

6.47 The following comments have been made:

- The existing use of the site as a large car park is a poor use of space and the Society supports some residential development on this brownfield site in order to help meet the Boroughs housing targets.
- We remain concerned about two matters relating to the setting of the Grade II Listed Cockfosters tube station and Trent Country Park. Charles Holden's Station is relatively low profile and the design needs to ensure that it does not dominate the structure. The Society would like to see Section 106 or CIL funding used to renovate the station, the associated subway and bus stand to the south west of Cockfosters Road to ensure that it is seen as the highlight of any development on this site.
- We also have concern about the visual impact of the development on views across Trent Park, particularly from the ridge along Limes Avenue, a key pedestrian and cycle route to Trent Park Mansion. While the reduction in height is welcome, we note from the Visual Impact assessment that the development will still be visible across the park particularly in the winter months when there are no leaves on the trees. A reduction of the height of the main tower to 10 stories would have been welcomed as this would have considerably reduced the impact on the park. If approval is granted by the Planning Committee, conditions should be imposed to ensure that all the materials used for external cladding and the colour of those materials are very carefully chosen to ensure that they minimise the impact on views from Trent Park.

Officer Comment: The above concerns raised are addressed in the relevant sections of the report below.

6.48 Friends of Trent Park: No comments received.

Hadley Wood Association (Response received 19/08/21)

6.49 Objection to the proposal for the following reasons:

- The buildings are too dense and too tall: they damage Trent Park, a Listed Garden and Green Belt; the Station building which is Grade II Listed, and the character of Cockfosters.
- The development would not provide the housing Enfield needs.
- Affordable homes for Enfield families: there should be 50% affordable homes; 40% are proposed. None of the homes are truly affordable. The flats proposed are predominantly one-bed; the housing need in Enfield is for family homes.
- The loss of the car parks and the absence of residents parking: they will force, potentially, over 750 cars to park on the residential streets of Cockfosters, with all

the associated road accident, congestion, air quality and amenity issues that entails.

- The loss of the car park will make access to the station difficult for those with statutory protected characteristics: disabilities, the elderly etc.
- Overloading local services: no allowance has been made for the strain the development will put on the local infrastructure: schools, doctor's surgeries etc.
- Traffic chaos: the five-year construction period will cause chaos on the Cockfosters Road. The up to 750 cars displaced from the site prowling local residential streets for the few remaining parking spaces will be disruptive, dangerous and unsustainable. The narrow entrance will be used by cars and mini-cabs dropping-off at the station, access to the disabled lift, deliveries to the flats, cyclists, pedestrians and cars parking in the remaining spaces on site, all turning into an already congested Cockfosters Road opposite Chalk Lane and the buses turning from the bus layby. This is a recipe for traffic chaos both during construction and afterwards.
- Non-compliance with numerous planning policies that will seriously damage Cockfosters, causing harm to, amongst others: local residents; the many people who use the Piccadilly line to access Trent Park and the London Loop for their recreation, as well as local and further-afield commuters; the bereaved visiting Trent Park Cemetery from Camden and Islington; and local businesses, particularly during the construction period.

Officer Comment: The above concerns raised are addressed in the relevant sections of the report below.

6.50 Southgate Civic Trust: No comments received.

Inclusion Barnet (Response received 15/09/21)

6.51 Object to the proposal for the following reasons:

- The lack of accessible car parking space resulting from the development will negatively impact disabled people both in Enfield and in areas of Barnet where people are likely to use the station. Accessible parking is key to disabled people being able to use a facility with confidence.
- There are clearly strong objections locally to the proposed development.

Officer Comment: The above concerns raised are addressed in the relevant sections of the report below.

Trent Park Conservation Committee (Response received 28/07/21)

6.52 Objection to the proposal for the following reason:

- The proposal will severely harm the Trent Park Conservation Area, adjacent protected heritage assets and this area of 'special character'.
- The development would be visually intrusive, spoiling the heritage views from the park and from many other vistas.

- The site is deemed inappropriate for tall buildings in the local plan.
- The site is inappropriate for high density (7 times what is acceptable for an outer suburb now).
- The proposal requires more much needed 3-bedroom family homes, not flats in high rise tower blocks.

Officer Comment: The above concerns raised are addressed in the relevant sections of the report below.

Public Consultation

- 6.53 Initial consultation on the application involved notification letters being sent to 590 neighbouring properties on 9 July 2021 (giving people 21 days to respond), 9 site notices being displayed (6 in the proximity of the site within the borough boundary and 3 in neighbouring Barnet streets - Mount Pleasant Road, Bevan Road and Chalk Lane) on 26 July 2021 and press notices being displayed in the Enfield Independent and the Barnet Times on 21 July 2021 and 29 July 2021 respectively (giving people 21 days to respond). Barnet Council has also sent 704 letters separately to their residents notifying them of the application and asking them to provide comment directly to Enfield.
- 6.54 The Council's initial consultation period on the application formally ended on 19 August 2021. In total, 2,630 representations were received with 14 of support and 2,616 raising objections to the proposal.
- 6.55 Following receipt of revisions and supplementary information, a further round of consultation was undertaken on the application. This comprised sending letters to 621 neighbouring properties (596 neighbouring properties on 12 November 2021 and an additional 25 neighbouring properties on 19 November 2021 (giving people 21 days to respond)), 2,564 neighbouring properties by email on 18 November 2021 (giving 21 days to respond), 9 site notices being displayed (6 in the proximity of the site within the borough boundary and 3 in neighbouring Barnet streets - Mount Pleasant Road, Bevan Road and Chalk Lane) on 15 November 2021 and press notices being displayed in the Enfield Independent and the Barnet Times on 17 November 2021 and 18 November 2021 respectively (giving people 21 days to respond).
- 6.56 The Council's re-consultation period on the application formally ended on 10 December 2021. A further 227 representations of objection were received.
- 6.57 The Council has followed the procedural requirements relating to applications which are departures (i.e. do not comply with the development plan policies) and the application has been advertised as a departure on the basis that it is not in accordance with Policies DMD43 and DMD44 of the Enfield Local Plan: Development Management Document (2014) and Policy G4 of the London Plan (March 2021). The outcome of this consultation is set out below.
- 6.58 In total, 2,857 representations were received with 14 of support and 2,843 raising objections to the proposal as set out in **Table 2** below.

Summary of objections	Response
Land Use	
<ul style="list-style-type: none"> Lack of affordable housing provision 	<p>Refer to '<i>Housing Need, Delivery and Mix</i>' section of the report below</p>
<ul style="list-style-type: none"> The development does not address Enfield's housing needs. Three-bed family houses are needed but less than a tenth of the proposed housing units are family homes. 	<p>Refer to '<i>Housing Need, Delivery and Mix</i>' section of the report below</p>
<ul style="list-style-type: none"> The proposed flats are not truly affordable and key workers will not be able to afford the rents. None of the rents are within the Mayor of London's definition of what is 'truly affordable'. 	<p>Refer to '<i>Housing Need, Delivery and Mix</i>' section of the report below</p>
<ul style="list-style-type: none"> The 'Affordable flats' will be segregated from the others. 	<p>Refer to '<i>Tenure Distribution</i>' in the '<i>Residential Quality and Amenity for Future Occupiers</i>' section of the report below</p>
<ul style="list-style-type: none"> The development does not address Enfield's housing needs. Three-bed family houses are needed but less than a tenth of the proposed housing units are family homes. 	<p>Refer to '<i>Housing Need, Delivery and Mix</i>' section of the report below</p>
<ul style="list-style-type: none"> The proposal conflict with the Local Plan. 	<p>Refer to '<i>Principle of Development (Land Use)</i>' section of the report below</p>
Design and Heritage	
<ul style="list-style-type: none"> Overdevelopment of the site. The proposed housing density is +7 times the norm for an outer suburb, indeed twice the norm for a city centre. 	<p>Refer to '<i>Residential Use</i>' in the '<i>Principle of Development (Land Use)</i>' section of the report below</p>
<ul style="list-style-type: none"> Tower blocks are not suitable on the site. 	<p>Refer to '<i>Design and Heritage</i>' section of the report below</p>
<ul style="list-style-type: none"> The height, bulk and massing of the buildings proposed are completely inappropriate for an outer suburb and the ugly design would be disproportionate to the surroundings and out of character with the local area. 	<p>Refer to '<i>Design and Heritage</i>' section of the report below</p>
<ul style="list-style-type: none"> The development would adversely impact on the Green Belt. 	<p>Refer to '<i>Green Belt and Open Space</i>' section of the report below</p>

<ul style="list-style-type: none"> The proposal would have a visually intrusive impact on the view of the Cockfosters Ridgeline, visible for miles around. 	Refer to ' <i>Design and Heritage</i> ' section of the report below
<ul style="list-style-type: none"> The proposal would have an overbearing impact on Trent Park and Trent Park Cemetery. 	Refer to ' <i>Design and Heritage</i> ' section of the report below
<ul style="list-style-type: none"> The proposal would cause permanent harm to the Trent Park Conservation Area and a number of nearby heritage assets. 	Refer to ' <i>Design and Heritage</i> ' section of the report below
<ul style="list-style-type: none"> The layout and density of buildings is inappropriate. 	Refer to ' <i>Design and Heritage</i> ' section of the report below
<ul style="list-style-type: none"> The design, materials and appearance of the buildings is inappropriate. 	Refer to ' <i>Design and Heritage</i> ' section of the report below
Amenity	
<ul style="list-style-type: none"> Increase in pollution. 	Refer to ' <i>Air Quality / Pollution</i> ' in the ' <i>Environmental Considerations</i> ' section of the report below
<ul style="list-style-type: none"> Lack of security. 	Refer to ' <i>Public Realm</i> ' in the ' <i>Design and Heritage</i> ' section and ' <i>Secure by Design</i> ' in the ' <i>Residential Quality and Amenity for Future Occupiers</i> ' section of the report below
<ul style="list-style-type: none"> Lack of appropriate facilities for disabled people. 	Refer to ' <i>Internal Floorspace Standards</i> ' in the ' <i>Residential Quality and Amenity for Future Occupiers</i> ' section and the ' <i>Transport, Access, Servicing and Parking</i> ' section of the report below
<ul style="list-style-type: none"> Lack of refuse and recycling provision. 	Refer to ' <i>Refuse and Recycling</i> ' in the ' <i>Transport, Access, Servicing and Parking</i> ' section of the report below
<ul style="list-style-type: none"> Overcrowding. 	Refer to ' <i>Residential Use</i> ' in the ' <i>Principle of Development (Land Use)</i> ' section of the report below

<ul style="list-style-type: none"> • Insufficient amenity space. 	Refer to ' <i>External Residential Amenity Space</i> ' in the ' <i>Residential Quality and Amenity for Future Occupiers</i> ' section of the report below
<ul style="list-style-type: none"> • Noise and disturbance. 	Refer to ' <i>Noise and Disturbance</i> ' in the ' <i>Residential Quality and Amenity for Future Occupiers</i> ' and the ' <i>Transport, Access, Servicing and Parking</i> ' sections of the report below
<ul style="list-style-type: none"> • Loss of privacy. 	Refer to ' <i>Outlook and Privacy</i> ' in the ' <i>Residential Quality and Amenity for Future Occupiers</i> ' section and ' <i>Outlook, privacy and Overlooking</i> ' in the ' <i>Residential Quality and Amenity for Future Occupiers</i> ' section of the report below
Transport	
<ul style="list-style-type: none"> • Loss of parking and 'park and ride' that is essential for vulnerable tube users. 	Refer to ' <i>Transport, Access, Servicing and Parking</i> ' section and ' <i>Equality Duty and Human Rights</i> ' section of the report below
<ul style="list-style-type: none"> • Increase in traffic congestion. 	Refer to ' <i>Transport, Access, Servicing and Parking</i> ' section of the report below
<ul style="list-style-type: none"> • Lack of car parking for future residents and users of the station. 	Refer to ' <i>Transport, Access, Servicing and Parking</i> ' section of the report below
<ul style="list-style-type: none"> • The access to the development will only make the already congested Cockfosters Road even more congested. 	Refer to ' <i>Transport, Access, Servicing and Parking</i> ' section of the report below
<ul style="list-style-type: none"> • Increase in parking problems in surrounding residential areas. 	Refer to ' <i>Transport, Access, Servicing and Parking</i> ' section of the report below
<ul style="list-style-type: none"> • Lack of disabled parking provision. 	Refer to ' <i>Transport, Access, Servicing and Parking</i> ' section of the report below
<ul style="list-style-type: none"> • Inadequate public transport provisions. 	Refer to ' <i>Transport, Access, Servicing and Parking</i> ' section of the report below

<ul style="list-style-type: none"> The access to the site from the heavily congested Cockfosters Road is wholly unsuitable and will cause traffic chaos. 	Refer to ' <i>Transport, Access, Servicing and Parking</i> ' section of the report below
<ul style="list-style-type: none"> Construction will bring up to 5 years of noise, dirt and disruption to the Cockfosters Road, harming local businesses and commuters. 	Refer to ' <i>Transport, Access, Servicing and Parking</i> ' section of the report below
<ul style="list-style-type: none"> Lack of safety on the Road especially Cockfosters Road. 	Refer to ' <i>Transport, Access, Servicing and Parking</i> ' section of the report below
<ul style="list-style-type: none"> Prejudicial to highway safety. 	Refer to ' <i>Transport, Access, Servicing and Parking</i> ' section of the report below
<ul style="list-style-type: none"> No upgrade to the local infrastructure is proposed. 	Refer to ' <i>Transport, Access, Servicing and Parking</i> ' section of the report below
<ul style="list-style-type: none"> No mitigation is made for the inevitable use of already over-parked neighbouring roads by the additional vehicles generated by the development. 	Refer to ' <i>Transport, Access, Servicing and Parking</i> ' section of the report below
Sustainability and Ecology	
<ul style="list-style-type: none"> Adverse impact on climate change. 	Refer to ' <i>Sustainability and Climate Change</i> ' section of the report below
<ul style="list-style-type: none"> The proposal will affect local ecology and adversely impact on nature conservation. 	Refer to ' <i>Biodiversity and Ecology</i> ' in the ' <i>Biodiversity, Trees and Landscaping</i> ' section of the report below
<ul style="list-style-type: none"> Increased danger of flooding. 	Refer to ' <i>Flood Risk and Drainage</i> ' section of the report below
<ul style="list-style-type: none"> Potentially contaminated land. 	Refer to ' <i>Contamination</i> ' in the ' <i>Environmental Considerations</i> ' section of the report below
<ul style="list-style-type: none"> Increase in wind tunnel impacts. 	Refer to ' <i>Wind Microclimate</i> ' in the ' <i>Environmental Considerations</i> ' section of the report below
Community Engagement	
<ul style="list-style-type: none"> Insufficient public consultation undertaken. 	Refer to ' <i>Consultations</i> ' section of the report above
Other	
<ul style="list-style-type: none"> There is no provision for upgrading local infrastructure, e.g. schools, GP surgeries and hospitals. 	Refer to ' <i>Education</i> ' and ' <i>Health</i> ' sections of the report below

<ul style="list-style-type: none"> Health and safety at work – there should be a fire staircase and a separate service staircase incorporated into each tower block for fire safety. The designs also appear to fail to provide any natural through-ventilation. 	Refer to ‘ <i>Fire Safety</i> ’ in the ‘ <i>Residential Quality and Amenity for Future Occupiers</i> ’ section of the report below
<ul style="list-style-type: none"> The proposal fails to adequately address equality and will disadvantage residents whose needs should be supported under the Equality Act 	Refer to ‘ <i>Equality Duty and Human Rights</i> ’ section of the report below

Table 2 – Summary of objections

6.59 A summary of reasons stated by those 14 representations supporting the scheme were:

- The proposal provides much needed homes in a location convenient for public transport and thus reduces car dependency.
- More homes near to Tube stations are needed to reduce the housing crisis and help reduce carbon emissions.
- London has a massive housing problem with young people struggling to find housing to rent and buy. This kind of public transport-oriented development is exactly what is needed if London is to even get anywhere close to solving the housing crisis.
- High quality, dense housing on brownfield land close to transport is a no brainer. It is in a sustainable location and will be reducing car parking numbers, which can only be a good thing given the climate crisis we are facing.
- Families can live in these apartments and 40% affordable housing must be welcomed with 80% of the 3 beds affordable.
- The design is of high quality, although disappointed to see only 351 homes on a site that could really take much more. It is not tall enough to make efficient use of the site. However, on balance given the extensive need for new homes this development should be recommended for approval.
- Publicly accessible green space should be welcomed and is an improvement on its current use. Significant amounts of green space are proposed and will make the site a great place to live.
- Development adjacent to Tube stations which will enhance quality of life by reducing commuting times. This is a much more sustainable mode of living. This is a highly appropriate use of such land. It is important to use the land - a scarce resource - as efficiently as possible, which means a decent level of density.

Petition

6.60 A link to an online petition of objection was submitted by the Federation of Enfield Residents and Allied Associations on 12 October 2021.

6.61 The online petition is a Change.org petition. At the time of writing this report the petition purported to have 12,030 signatories. Officers have requested an electronic full copy of the petition, including the names, addresses and signatures of all that have signed it together with their individual comments so that the content of the petition can be verified. The full copy has not been provided and therefore Officers are unable to confirm the accuracy or content of the petition.

6.62 The grounds of objection set out in the e-petition's covering statement are set out in detail below:

- TfL should not be closing suburban station car parks.
- The car parks are essential resources for women to get back safely at night to their home in the quiet suburbs of London.
- The station car parks are essential for older people and people with disabilities (not just blue badge holders, but also the many hundreds of thousands of people that have disabilities, but do not hold a blue badge) to be able to access London's transport network.
- Not everyone is able to walk or get public transport to the tube station. This is especially true of the suburban tube stations, where public transport isn't as frequent and, in the case of Cockfosters, an end-of-the-line station, it's a very steep, hilly area and the bus services are very limited. Closure of such a station car park will disadvantage so many people that are protected under the Equality Act 2010.
- Closing the suburban tube station car parks is not 'green', in fact, it is quite the opposite. People that live outside of London use these as park-and-ride facilities. Park-and-ride is an established and well-recognised green initiative. To get rid of these forever by building on them is a ridiculous idea.
- The fact that the Mayor of London/TfL plans to close 12 suburban station car parks, mainly clustered in the north west of London, without a full public consultation (that should've taken place years ago, when the plans were drawn up), smacks of a blatant disregard for women's safety and disabled rights.

7. RELEVANT POLICIES

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

7.2 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area comprises the Enfield Core Strategy (2010); the Enfield Development Management Document; and the London Plan 2021, which was published and became part of the statutory development plan on 2 March 2021.

London Plan (March 2021)

7.3 The Mayor of London's Spatial Development Strategy for London (The London Plan) was published in March 2021. The following policies are considered particularly relevant:

GG1: Building strong and inclusive communities
GG2: Making the best use of land
GG3: Creating a healthy city
GG4: Delivering the homes Londoners need
GG6: Increasing efficiency and resilience
SD6: Town centre and high streets
SD7: Town centres: development principles and development plan documents
SD8: Town centre network
SD9: Town centres: local partnerships and implementation
SD10: Strategic and local regeneration
D1: London's form, character and capacity for growth
D2: Infrastructure requirements for sustainable densities
D3: Optimising site capacity through the design-led approach
D4: Delivering good design
D5: Inclusive design
D6: Housing quality and standards
D7: Accessible housing
D8: Public realm
D9: Tall buildings
D11: Safety, security and resilience to emergency
D12: Fire safety
D13: Agent of change
D14: Noise
H1: Increasing housing supply
H4: Delivering affordable housing
H6: Affordable housing tenure
H10: Housing size mix
H11: Build to rent
S1: Developing London's social infrastructure
S2: Health and social care facilities
S3: Education and childcare facilities
S4: Play and informal recreation
S5: Sports and recreation facilities
S6: Public toilets
E2: Providing suitable business space
E9: Retail, markets and hot food takeaways
E11: Skills and opportunities for all
HC1: Heritage conservation and growth
HC3: Strategic and local views
G1: Green Infrastructure
G4: Open space
G5: Urban greening
G6: Biodiversity and access to nature

G7: Trees and woodlands
SI1: Improving air quality
SI2: Minimising greenhouse gas emissions
SI3: Energy infrastructure
SI4: Managing heat risk
SI5: Water infrastructure
SI6: Digital connectivity infrastructure
SI7: Reducing waste and supporting the circular economy
SI8: Waste capacity and net waste self-sufficiency
SI12: Flood risk management
SI13: Sustainable Drainage
T1: Strategic Approach to Transport
T2: Healthy Streets
T3: Transport Capacity, Connectivity and Safeguarding
T4: Assessing and Mitigating Transport Impacts
T5: Cycling
T6: Car Parking
T6.1: Residential parking
T6.3: Retail parking
T7: Deliveries, servicing and construction
T9: Funding Transport Infrastructure Through Planning
DF1: Delivery of the Plan and Planning Obligations

Adopted Local Plan – Core Strategy

7.4 The Core Strategy was adopted in November 2010 and sets out a spatial planning framework for the development of the Borough through to 2025. The document provides the broad strategy for the scale and distribution of development and supporting infrastructure, with the intention of guiding patterns of development and ensuring development within the borough is sustainable.

7.5 The following local plan Core Strategy policies are considered particularly relevant:

Core Policy 1: Strategic Growth Areas
Core Policy 2: Housing Supply and Locations for New Homes
Core Policy 3: Affordable Housing
Core Policy 4: Housing Quality
Core Policy 5: Housing Types
Core Policy 6: Meeting Particular Housing Needs
Core Policy 7: Health and Social Care Facilities and the Wider Determinants of Health
Core Policy 8: Education
Core Policy 9: Supporting Community Cohesion
Core Policy 17: Town Centres
Core Policy 20: Sustainable Energy Use and Energy Infrastructure
Core Policy 21: Delivering Sustainable Water Supply, Drainage Sewerage Infrastructure
Core Policy 22: Delivering Sustainable Waste Management
Core Policy 24: The Road Network

Core Policy 25: Pedestrians and Cyclists
Core Policy 26: Public Transport
Core Policy 28: Managing Flood Risk Through Development
Core Policy 29: Flood Management Infrastructure
Core Policy 30: Maintaining and Improving the Quality of the Built and Open Environment
Core Policy 31: Built and Landscape Heritage
Core Policy 32: Pollution
Core Policy 33: Green Belt
Core Policy 34: Parks, Playing Fields and Other Open Spaces
Core Policy 36: Biodiversity
Core Policy 46: Infrastructure Contributions

Adopted Local Plan - Development Management Document

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

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

DMD 1: Affordable Housing on Sites Capable of Providing 10 units+
DMD 3: Providing a Mix of Different Sized Homes
DMD 6: Residential Character
DMD 8: General Standards for New Residential Development
DMD 9: Amenity Space
DMD 10: Distancing
DMD 25: Locations for New Retail, Leisure and Office Development
DMD 32: Managing Food and Drink Establishments
DMD 37: Achieving High Quality and Design-Led Development
DMD 38: Design Process
DMD 40: Ground Floor Frontages
DMD 43: Tall Buildings
DMD 44: Conserving and Enhancing Heritage Assets
DMD 45: Parking Standards and Layout
DMD 47: New Road, Access and Servicing
DMD 48: Transport Assessments
DMD 49: Sustainable Design and Construction Statements
DMD 50: Environmental Assessments Method
DMD 51: Energy Efficiency Standards
DMD 52: Decentralized Energy Networks
DMD 53: Low and Zero Carbon Technology
DMD 54: Allowable Solutions
DMD 55: Use of Roof Space
DMD 56: Heating and Cooling
DMD 57: Responsible Sourcing of Materials, Waste Minimisation and Green Procurement
DMD 58: Water Efficiency
DMD 59: Avoiding and Reducing Flood Risk

DMD 60: Assessing Flood Risk
DMD 61: Managing Surface Water
DMD 62: Flood Control and Mitigation Measures
DMD 63: Protection and Improvement of Watercourses and Flood Defences
DMD 64: Pollution Control and Assessment
DMD 65: Air Quality
DMD 66: Land Contamination and instability
DMD 68: Noise
DMD 69: Light Pollution
DMD 70: Water Quality
DMD 71: Protection and Enhancement of Open Space
DMD 72: Open Space Provision
DMD 73: Child Play Space
DMD 76: Wildlife Corridors
DMD 77: Green Chains
DMD 78: Nature Conservation
DMD 79: Ecological Enhancements
DMD 80: Trees on Development Sites
DMD 81: Landscaping
DMD 82: Protecting the Green Belt
DMD 83: Development adjacent to the Green Belt
DMD 84: Areas of Special Character

London Plan and Adopted Local Plan Designations

7.8 The designations relevant to the site itself are as follows:

- Local Centre: the frontage of Site B and the Station are within Cockfosters Large Local Centre;
- Conservation Area and Area of Special Character: Site A falls partially within Trent Park Conservation Area, centered on Trent Park House which is within a designated Area of Special Character;
- Archaeology: Site A is within the Camlet Moated Site Archaeological Priority Area;
- Local Open Space: A small area of trees and shrub vegetation (approx. 815sqm) to the north of Site A is designated as local open space;
- Flood Risk: The site is located entirely within Flood Zone 1 (low risk); and
- Air Quality: The whole Borough of Enfield is a designated Air Quality Management Area.

7.9 The designations relevant to land adjacent to the site are as follows:

- Green Belt: The north and eastern boundaries of Site A demarcate the edge of the Green Belt designation which encompasses Trent Park;
- Listed Building: The Station is Listed at Grade II, located between Site A and Site B both of which are within its setting;
- Registered Park and Garden: Trent Park is Registered at Grade II and Site A is within its setting;
- Site of Importance for Nature Conservation (SINC): A Site of Metropolitan

Importance for Nature Conservation (SMINC) adjoins Site A to the east and south. A Site of Borough Importance for Nature Conservation (SBINC) additionally extends adjacent to the south west boundary of Site A between the site and the railway tracks and to the south of the site;

- Wildlife Corridor: Near to the site, the railway tracks are designated as a wildlife corridor; and
- Tree Preservation Order: There are two Tree Preservation Orders (TPOs) outside the site to the north of Site A, within the garden of 120 Cockfosters Road.

Emerging Local Plan

7.10 The Council consulted on Enfield Towards a New Local Plan 2036 “Issues and Options” (Regulation 18) (December 2018) in 2018/19.

7.11 A second Regulation 18 ‘Main Issues and Preferred Approaches’ document was approved for consultation on 9 June 2021. Public consultation concluded on 13 September 2021. This document identifies a preferred level of growth and sets out a preferred spatial strategy and related policies for accommodating growth. However, given the stage in the process, the Regulation 18 documents are considered to have very little weight in determining planning applications. Notwithstanding the emerging Plan’s limited weight, the following emerging spatial policies should be noted:

- Strategic Policy SP H1 identifies the site for the delivery of homes, contributing towards the overall target. Allocated sites would contribute 23,610 homes towards the overall target.
- The site is allocated for housing, and SA31 identifies an estimated capacity of the site for 316 new homes to be delivered over the next 5-10 years. It highlights the need to consider heritage and the archaeological priority area location.
- Figure 2.3 identifies intensification around Cockfosters transport node, and Figure 7.2 identifies the site as an area for ‘transformative’ change. The Site is identified as an appropriate location for tall buildings by Figure 7.5.
- Strategic Policy SP H1 allocates the site for housing development accommodating 316 new homes (estimated capacity) over the next 5-10 years. The detail of this is set out at SA31 showing the boundary of the allocated site.
- Policy DM DE6 Tall Buildings outlines that the principle of tall buildings will be supported in appropriate locations, however they must be of sufficient design quality and relate well to the character of the immediate context and surrounding area.

National Planning Policy Framework (July 2021)

7.12 The National Planning Policy Framework (NPPF) sets out national planning policy objectives. It includes a presumption in favour of sustainable development, which is identified as having three dimensions - an economic role, a social role and an environmental role.

NPPF – Housing Delivery Test / Presumption in Favour of Development

7.13 In accordance with the NPPF, paragraph 11(d) footnotes 7 and 8, the Council’s

policies most important for determining this application are out-of-date. The Council is also unable to demonstrate a 5-year housing supply. The tilted balance in the NPPF is engaged

- 7.14 On 19 January 2021, MHCLG published its 'Housing Delivery Test: 2020 Measurement' ("HDT 2020"), which records that the Council achieved 56% delivery against its strategic housing requirements, triggering the 'tilted balance' requirement within the 'presumption in favour of sustainable development' set out in NPPF, para 11(d). The Housing Delivery Test figures issued by MHCLG in January 2022 confirmed that the Council continues to be 'a presumption authority'.
- 7.15 The housing policies contained within Enfield's Development plan, are considered out-of-date where the Housing Delivery Test finds that the delivery of housing in the LPA area was substantially below the housing requirement over the previous three years or where the Council is not able to demonstrate a five-year housing supply.
- 7.16 This requirement is in addition to the requirements to apply a 20% buffer when assessing the five-year supply of deliverable housing land in the Borough and the preparation of a housing delivery action plan in accordance with national planning policy and practice guidance. The LPA's performance against the HDT 2021 are a material planning consideration for a housing-led scheme, such as this one.
- 7.17 The 'tilted balance' applies: for applications involving the provision of housing, situations ... where the HDT 2020 indicates that the delivery of housing was substantially below (less than 75% of) the housing requirement over the previous three years.
- 7.18 NPPF Paragraph 11(d) states that where the policies which are most important for determining the application are out-of-date, decisions-taking means granting permission 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; or
 - any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.
- 7.19 In respect of housing delivery, the London Plan (2021) provides the most up to date Development Plan policies to be relied on when assessing this application scheme.

Planning Practice Guidance (PPG)

- 7.20 The Government published PPG sets out further detailed guidance on the application of policies set out in the NPPF. It provides guidance in relation to (amongst other things), decision making, planning conditions and obligations, EIA, the historic and natural environment and design.

Other Material Considerations and guidance

7.21 The following adopted guidance is also considered particularly relevant:

- Enfield: Characterisation Study (2011)
- Report on Location of Tall Buildings and Important Local Views in Enfield (2013)
- Enfield Infrastructure Delivery Plan (2014)
- Enfield Decentralised Energy Network Technical Specification SPD (2015)
- Enfield Section 106 Supplementary Planning Document (November 2016)
- Trent Park Conservation Area Character Appraisal (2015)
- Enfield Heritage Strategy 2019-2024 SPD (2019)
- Enfield Housing and Growth Strategy 2020-2030 (January 2020)
- Enfield Climate Action Plan 2020 (July 2020)
- Enfield: Blue and Green Strategy (2021-2031) (June 2021);
- London Councils: Air Quality and Planning Guidance (2007)
- GLA: Shaping Neighbourhoods: Play and Informal Recreation SPG (2012)
- GLA: Homes for Londoners: Affordable Housing and Viability SPG (2017)
- GLA: Accessible London: Achieving an Inclusive Environment SPG (2014)
- GLA: Shaping Neighbourhoods: Character and Context SPG (2014)
- GLA: The Control of Dust and Emissions during Construction and Demolition SPG (2014)
- TfL London Cycling Design Standards (2016)
- GLA: Social Infrastructure SPG (2015)
- GLA: Housing SPG (2016)
- Healthy Streets for London (2017)
- Mayor's Transport Strategy (2018)
- Practice note on the threshold approach to affordable housing on public land (2018)
- National Design Guide (January 2021)
- Manual for Streets 1 & 2, Inclusive Mobility (2005)
- The Setting of Heritage Assets – Historic Environment Good Practice Advice in Planning: 3, Historic England (2017)
- Active Design guidance, Sport England/Public Health England (October 2015)

7.22 The following emerging guidance is also considered relevant, although of limited weight:

- GLA: Good Quality Homes for All Londoners Guidance – consultation draft (October 2020)
- GLA: Public London Charter – consultation draft (October 2020)
- GLA: Circular Economy Statements – consultation draft (October 2020)
- GLA: Whole-life Carbon Assessments – consultation draft (October 2020)
- GLA: 'Be Seen' Energy Monitoring Guidance – consultation draft (October 2020)
- GLA: Transport Land – pre-consultation draft (March 2021)
- GLA: Urban Greening Factor – pre-consultation draft (March 2021)
- GLA: Fire Safety Policy D12(A) – pre-consultation draft (March 2021)
- GLA: Air Quality Positive – pre-consultation draft (March 2021)

7.23 The following additional considerations are considered material to the consideration

of this application.

- The Environment Act 2021: The Environment Act received Royal Assent on 9 November 2021. The Act introduces new requirements for planners and developers. Under the Act, all new development will (when the provisions are in force) be required to deliver a 10% increase in biodiversity. Local Authorities will be required to produce a 'Biodiversity Report' every five years. They will need to describe action taken and its impact, and a summary of action taken under the Biodiversity Net Gain policy.

Relevant planning appeals and case law

7.24 **Appeal Ref: APP/Q5300/W/20/3263151: 79 Windmill Hill, Enfield EN2 7AF:** This appeal was allowed on 02 November 2021 for 49 x self-contained flats within 3 Blocks. The position in respect of affordable housing and housing mix are relevant to the consideration of this application.

- Paragraphs 19 and 20 of the appeal decision sets out that the Council's Core Strategy mix targets should not be applied mechanistically to every scheme on every site – but rather applied over the lifetime of the CS across the entire borough. Enfield's Core Strategy and Development Management Document mix policies have less weight than Policy H10 of the London Plan (2021) – which stresses the importance of locational factors when considering mix and the benefits of 1 and 2 bed dwellings in taking pressure off conversions of larger family homes to smaller dwellings.
- Paragraphs 15 to 17 consider the Council's 40% Affordable Housing requirement set out at policy Enfield's Development Management Document Policy DMD1 in the context of London Plan Policy, including H4 and conclude that the amount of affordable housing should correctly be tested by viability where there is evidence of viability issues affecting a development.

7.25 **Appeal Ref: APP/Q5300/W/21/3270885: Southgate Office Village, 286 Chase Road, Southgate N14 6HT:** This appeal was allowed on 14 December 2021 for the erection of a mixed-use (C3) scheme ranging from 2 to 17 storeys with a dual use café (B1/A3), with associated access, basement car and cycle parking, landscaping, and ancillary works

- Paragraphs 47 to 54 of the appeal decision considers the application of Policy D9: Tall buildings of the London Plan within the Borough and notes in paragraph 52 "*it is not entirely clear whether the policy limits tall buildings to locations that have been identified through a development plan or allows for tall buildings to come forward wherever their impacts can be shown to be acceptable. In the context of what is widely accepted to be a housing crisis in London, and the length of time it might take for sites suitable for tall buildings to work their way through the various local planning processes across the capital, the latter would appear to me to make more sense*".
- Paragraph 54 notes "*The evidence shows that at present, they {the Council} can demonstrate a supply {Housing} of just over two years...that would make LP Policy D9 (amongst others) out-of-date*"
- Paragraph 55 provides the following commentary on paragraph 11d)ii of the

NPPF commenting “*This sets out that in the situation under consideration, planning permission should be granted 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. The only harmful aspect of the scheme is that its timing relative to the emerging Local Plan means that the Council, residents, and others with an interest, would lose the opportunity to consider the suitability of the site for a tall building, or buildings, through the examination process, whenever it might take place. To my mind, bearing in mind the parlous state of the Council’s housing land supply, the harm that flows from that pales against the enormous benefits of the open-market and affordable housing the scheme would bring forward in a well-designed, contextually appropriate scheme.*”

- Paragraph 56 goes on to state “*It seems to me therefore that whichever way one approaches the matter, the answer is the same; planning permission should be granted for the proposal*”.

7.26 **High Court Judgment on London Plan, policy D9: Tall Buildings: *LB Hillingdon v Mayor of London* [2021] EWHC 3387 (Admin):** this judgment dated 15 December 2021 related to a judicial review of the decision made by LB Hillingdon on 30 March 2021, to grant planning permission for the construction of a mixed-used development, comprising buildings up to 11 storeys in height, at the site of the former Master Brewer Motel, Freezeland Way, Hillingdon. The case considered the application of Policy D9 of the London Plan. The key aspects of the judgement are set out below:

- Paragraph 81 “*Read straightforwardly, objectively and as a whole, policy D9: (i) requires London Boroughs to define tall buildings within their local plans, subject to certain specified guidance (Part A); (ii) requires London Boroughs to identify within their local plans suitable locations for tall buildings (Part B); (iii) identifies criteria against which the impacts of tall buildings should be assessed (Part C); and (iv) makes provision for public access (Part D)*”.
- Paragraph 82 “*There is no wording which indicates that Part A and/or Part B are gateways, or pre-conditions, to Part C. In order to give effect of Mr Howell Williams QC’s interpretation, it is necessary to read the words underlined below into the first line of Part C to spell out its true meaning: “Development proposals in locations that have been identified in development plans under Part B should address the following impacts.” But if that had been the intention, then words to that effect would have been included within the policy. It would have been a straightforward exercise in drafting. It is significant that the Secretary of State’s direction only required the addition of the word “suitable” to Part B(3). It did not add any text which supports or assists the Claimant’s interpretation, even though the Secretary of State had the opportunity to do so.*”
- Paragraph 83 “*In my view, the context is critical to the interpretation. Policy D9 is a planning policy in a development plan. By section 70(2) TCPA 1990 and section 38(6) PCPA 2004, there is a presumption that a determination will be made in accordance with the plan, unless material considerations indicate*”

otherwise. Thus, the decision-maker “will have to decide whether there are considerations of such weight as to indicate that the development plan should not be accorded the priority which the statute has given to it”: per Lord Clyde in *City of Edinburgh* at 1459G. Furthermore, the decision-maker must understand the relevant provisions of the plan “recognising that they may sometimes pull in different directions”: per Lindblom LJ in *BDW Trading Ltd* at [21], and extensive authorities there cited in support of that proposition. As Lord Reed explained in *Tesco Stores Ltd v Dundee City Council*, “development plans are full of broad statements of policy, many of which may be mutually irreconcilable, so that in a particular case one must give way to another”.

- **Paragraph 84** “The drafter of Policy D9, and the Defendant who is the maker of the London Plan, must have been aware of these fundamental legal principles, and therefore that it was possible that the policy in paragraph B(3) might not be followed, in any particular determination, if it was outweighed by other policies in the development plan, or by material considerations. It seems likely that policy provision was made for such cases, given the importance of the issue”.
- **Paragraph 85** “In considering whether to grant planning permission for a tall building which did not comply with paragraph B(3), because it was not identified in the development plan, it would surely be sensible, and in accordance with the objectives of Policy D9, for the proposal to be assessed by reference to the potential impacts which are listed in Part C. The Claimant’s interpretation leads to the absurd result that a decision-maker in those circumstances is not permitted to have regard to Part C and must assess the impacts of the proposal in a vacuum.
- **Paragraph 86** “In these circumstances, it is unsurprising that there are at least three decisions, both prior to and since the Defendant’s decision in this case, in which the Claimant’s planning officers have interpreted Policy D9 in the same way as the Defendant, in considering other tall building proposals in Hillingdon”.
- **Paragraph 87** “In this case, the extracts from the officer reports which I have referred to above, explain that the Mayor found that the proposal did not fully accord with Policy D9, because it had not been identified as suitable in the development plan under Part B. Notwithstanding the non-compliance with Part B of Policy D9, the Defendant determined that the proposal accorded with the provisions of the development plan when read as a whole. That was a planning judgment, based on the benefits of the proposal, such as the contribution of much-needed housing, in particular affordable housing, and the suitability of the Site (brownfield and sustainable, with good transport). The Defendant was satisfied, on the advice of the GLA officers, that sufficient protection from air quality impacts would be achieved. The Defendant was entitled to make this judgment, in the exercise of his discretion.
- **Paragraph 88** “For the reasons set out above, Ground 1 does not succeed”.

8. ASSESSMENT

8.1 The main planning issues to consider are as follows:

- Principle of Development (Land Use)
- Housing Need, Delivery and Mix

- Residential Quality and Amenity for Future Occupiers
- Heritage and Design
- Green Belt and Open Space
- Neighbouring Amenity
- Transport, Access, Servicing and Parking
- Biodiversity, Trees and Landscaping
- Sustainability and Climate Change
- Flood Risk and Drainage
- Environmental Considerations
- Socio-Economics and Health
- Education
- Equality Duty and Human Rights
- Community Infrastructure Levy
- Conclusion

Principle of Development (Land Use)

- 8.2 The Planning and Compulsory Purchase Act 2004 and the Town and Country Planning Act 1990 seek to establish that planning decisions are taken in accordance with the Development Plan unless material considerations indicate otherwise. Running alongside this is the aim that planning should facilitate sustainable development, and this is at the heart of the NPPF which advocates a presumption in favour of sustainable development (paragraph 11).
- 8.3 Paragraph 8 of the NPPF advises that the planning system can contribute to the achievement of sustainable development by:
- ensuring the right type of land is developed in the right places (economic objective);
 - supporting strong, vibrant and healthy communities with enough homes, accessible services and open spaces (social objective); and
 - protecting and enhancing the natural, built and historic environment including making effective use of land (environmental objective).
- 8.4 The Development Plan includes local policies (Core Strategy / Development Management Plan) as well as the London Plan (2021) and national guidance. The London Plan policies will have greater weight where there is inconsistency with local policy given its more recent adoption in March 2021.
- 8.5 The NPPF also requires planning to '*promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained, and sites could be used more effectively (for example... car parks)*' (Paragraph 120, d).
- 8.6 Paragraph 1.2.5 of the London Plan states 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'.

8.7 Policy GG2 of the London Plan requires development to prioritise sites that are well-connected by public transport, particularly for intensifying the use of brownfield and surplus public sector land and delivering additional homes.

8.8 Such an approach to maximise the efficient use of land is consistent with the adopted London Plan which states at Para 1.2.2 of the London Plan:

"The key to achieving this will be taking a rounded approach to the way neighbourhoods operate, making them work not only more space-efficiently but also better for the people who use them. This will mean creating places of higher density in appropriate locations to get more out of limited land, encouraging a mix of land uses, and co-locating different uses to provide communities with a wider range of services and amenities."

8.9 Para 1.1.4 of the London Plan also states:

"Delivering good quality, affordable homes, better public transport connectivity, accessible and welcoming public space, a range of workspaces in accessible locations, built forms that work with local heritage and identity, and social, physical and environmental infrastructure that meets London's diverse needs is essential if London is to maintain and develop strong and inclusive communities".

8.10 These strategic planning ambitions are captured in Policies GG1 (Building Strong & Inclusive Communities), GG2 (Making the best use of Land) , GG3 (Creating a Healthy City) and GG4 (Delivering the Homes Londoners Need) with the proposal needing to be viewed in this policy context.

8.11 Making the 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 (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.

8.12 Strategic Objective 2 of the Council's adopted Core Strategy is to promote sustainable patterns of development by integrating infrastructure and housing, to reduce the Borough's carbon footprint and minimise the need to travel.

8.13 Paragraph 60 of the NPPF sets out the government's objective to boost the supply of homes and the paragraphs following it set out the requirement for the supply of homes to meet the needs of different groups in the community, including for affordable housing. Policy GG4 of the London Plan supports this agenda, stating that planning and development must *'A) ensure that more homes are delivered'*. Paragraph 1.4.3 of the London Plan also states that *'the lack of supply of homes that*

Londoners need has played a significant role in London's housing crisis'. It requires planning to create mixed and inclusive communities and ensure that homes are built quickly.

- 8.14 Paragraph 104 of the NPPF sets out objectives for considering transport issues in the planning process, including ensuring opportunities to promote walking, cycling and public transport. It requires development to be focused on locations which are sustainable and can offer a range of transport modes to help reduce congestion and emissions and improve air quality and public health (Paragraph 105 of the NPPF).
- 8.15 There has been a strong policy shift towards the importance of optimising the capacity of housing, and prioritising this over other land uses, especially surface car parking, which is inefficient and encourages unsustainable modes of travel. The reuse of an inefficiently used site such as this, used for car parking is supported by Policy H1 (Part B 2)) of the London Plan, the London Housing Strategy and paragraph 120 of the NPPF.
- 8.16 Whilst of very limited weight, it should also be noted that the Council's emerging Local Plan (Regulation 18 'Main Issues and Preferred Approaches' consultation document), includes Strategic Policy SP H1 allocates the site (Site Allocation SA31) for housing with an estimated capacity of 316 homes being given. The Council's Strategic Housing Land Availability Assessment (2020) (SHLAA) also identifies the site (references COC9a and COC9b) as being appropriate for mixed use residential development.
- 8.17 Sites A and B have no specific policy designations, except for Site A which includes an area of open space. It is proposed that the car park sites be redeveloped to provide 4 residential blocks with 351 homes, a small amount of flexible retail floorspace on Site B and the reprovision of the existing TfL office and existing area of open space on Site A.
- 8.18 The principle of the proposed uses is discussed in full below.

Residential Use

- 8.19 The benefits of delivering housing on an under-utilised brownfield site in a highly accessible location (directly adjacent to a tube station), partially within and directly adjacent to a designated local centre (Cockfosters Local Centre) has strong planning policy support and should be afforded substantial weight in the determination of the application. The site is uniquely situated directly adjacent to a tube station – providing a robust case for a car-free development.
- 8.20 With specific regard to the residential element of the proposal, it is noted that the NPPF sets out the government's objective to boost the supply of homes. The NPPF also states an intention to ensure that supply meets the needs of different groups in the community, including an affordable housing need. Policy GG4 of the London Plan supports this intention, stating that planning and development must '*ensure that more homes are delivered*' and must '*create mixed and inclusive communities, with good quality homes that meet high standards of design and provide for identified needs,*

including for specialist housing’.

- 8.21 Policy H1 of the London Plan stresses the importance of encouraging residential development on appropriate windfall sites, especially where they have a high PTAL rating (3-6) or are located within 800m of a Tube station, and/or involve the mixed-use redevelopment of car parks (Part B 2)b)) and public sector owned sites (Part B 2)(d)). The Council’s Core Strategy (4.1 Spatial Strategy) identifies that sustainable locations for development would be concentrated in town centres, on previously developed land and that new homes will be planned through the intensification of land uses.
- 8.22 Policy DMD 8 of the Local Plan requires new residential development to be appropriately located, taking into account the nature of the surrounding area and land uses and access to local amenities. This is echoed by draft Policy H1 c) of the Emerging Local Plan which states that development proposals must *‘make the most efficient possible use of land by promoting higher density development in suitable, accessible locations, taking into account local character and existing and planned infrastructure capacity’*. The London Housing Strategy (2018) at paragraph 3.27 states that *‘incentives are needed to encourage landowners to redevelop sites that are currently used inefficiently – such as surface car parks...and to support quicker build out rates on sites’*.
- 8.23 The Mayor’s Affordable Housing and Viability SPG sets out the intention to bring forward more public land for affordable homes. Paragraph 4.4 of the SPG outlines the benefits of Build to Rent developments noting these: attract investment into London’s housing market that otherwise would not be there, particularly since Build to Rent is attractive to institutional investors seeking long-term, inflation-tracking returns; accelerate delivery on individual sites as they are less prone to ‘absorption constraints’ that affect the build-out rates for market sale properties; more easily deliver across the housing market cycle as they are less impacted by house price downturns; provide a more consistent and at-scale demand for off-site manufacture; offer longer-term tenancies and more certainty over long-term availability; ensure a commitment to, and investment in, place making through single ownership; and provide better management standards and higher quality homes than other parts of the private rented sector. Build to Rent is considered in greater detail below.
- 8.24 Paragraphs 104 and 105 of the NPPF set out objectives for considering transport issues in the planning process, including ensuring opportunities to promote walking, cycling and public transport, and requires development be focused in locations which are sustainable and can offer a range of transport modalities to help reduce congestion and emissions and improve air quality and public health. The site is in a highly accessible and sustainable location, immediately adjacent to an underground station with a bus stop immediately at the front of the site.
- 8.25 The proposal is for 351 residential units on a site which the Council has identified as being appropriate for mixed use residential development (SHLAA (2020) – reference COC9a and COC9b). The Borough’s housing delivery targets have been set by the GLA and the London Plan states that Enfield is required to provide a minimum of 12,460 homes over the next 10 years (equivalent to 1,246 per annum), in comparison

to the previous target of 7,976 for the period 2015-2025.

- 8.26 According to the Enfield Housing Trajectory Report (2019), during the previous 7-years the Borough has delivered a total of 3,710 homes which equates to around 530 homes per annum. Furthermore, given the new target of 1,246 per annum the borough needs to optimise all options in terms of housing delivery, particularly on existing brownfield sites and transport hubs, as is the case here.
- 8.27 The Council is currently updating its Local Plan and through publishing the Issues and Options (Regulation 18) last year has been transparent about the sheer scale of the growth challenge for Enfield. The published Regulation 18 document, whilst very limited in weight, is clear about the need to plan differently to attain a significant step change in delivery and secure investment in our borough. The council needs to encourage a variety of housing development including market, affordable and Build to Rent products, as is proposed here, in order to meet varied local demand.
- 8.28 In terms of national policy, the provision of housing on underutilised brownfield sites in highly accessible locations is in line with the NPPF principles in respect of sustainable development (social, economic and environmental).
- 8.29 This approach is also in line with the adopted and draft London Plan which supports the optimisation of underutilised and highly accessible brownfield sites. It is also aligned with a plan-led approach to directing density and scale to sites where new resident populations can most sustainably be supported.
- 8.30 In relation to sustainable development the proposal is considered to respond to the objectives of the NPPF by redeveloping a brownfield site; by providing homes that are highly accessible (directly adjacent to a tube station) and easily accessible to local amenities; by providing a range of housing to support a mixed and balanced community; and by having due regard to the local natural, built and historic environment. It is also considered that the proposed number of residential units on the site would contribute to providing housing to assist in meeting the borough's challenging housing delivery target and help bridge the shortfall that has been the case in previous years.

Loss of the Existing Car Parking

- 8.31 The site is currently in use as a public car park and car wash, providing 407 car parking spaces, 37 of which are for LUL staff and train drivers and 12 of which are for blue badge holders for the Station. The existing 370 publicly accessible car parking spaces (358 general and 12 blue badge spaces) would mostly be removed, replaced with 47 publicly accessible spaces (35 general and 12 blue badge) and a drop-off/pick-up area comprising 7 spaces within the site (Site A), close to the Station entrance. One blue badge car parking space for LUL staff and a designated car club bay are also proposed.
- 8.32 The loss of the existing car parking is a planning consideration in the assessment of the proposal. This is by virtue of the proposed change in land use which as set out in the 'Residential Use' section above, is considered to be acceptable – and in

consideration of impact on existing users of the car park. Adopted and emerging Development Plan policies encourage sustainable travel in locations with excellent public transport links, such as the application site. The existing car park incentivises unsustainable travel behaviours (private car use), contrary to adopted and emerging Development Plan transport policies. The reduction of more than 90% of the existing car parking, and provision of infrastructure on site to support sustainable travel modes, such as walking, cycling and electric car charging will encourage a positive change to patterns of travel behaviour towards low and zero carbon modes and improvement to air quality. This will contribute towards Enfield's promise to reduce travel by private car in the medium term and is supported by Officers.

- 8.33 Analysis of the objections received (from both the public and neighbours) indicates that a proportion of objectors highlight impacts that currently arise on local amenity, within Cockfosters – which are attributed to use of the existing car park. Existing impacts include congestion, traffic, pollution, nuisance and noise.
- 8.34 Further analysis of the above objections supports the view that a substantial proportion of residents and existing car park users live in locations where alternative sustainable travel options are available. The loss of the car park would result in Enfield's residents being able to undertake their journey's by public transport or other sustainable modes / active travel options.
- 8.35 The Applicant has carried out comprehensive surveys of the use of the existing car park and concluded that most drivers have alternative forms of public transport available to them (See '*Transport, Access, Servicing and Parking*' section below). The proposed site adjoins a tube station and bus interchange and as such, as indicated above, makes it a sustainable place to live.
- 8.36 As mentioned above, in terms of national policy the provision of housing on underutilised brownfield sites in highly accessible locations and to increase densities, is a key driver within the NPPF particularly where this would help to meet identified needs for housing; where land supply is constrained; and where it is considered sites could be used more effectively. This approach is also in line with the draft London Plan's direction of travel which is to optimise underutilised brownfield sites.
- 8.37 Policy H1 of The London Plan advocates for housing delivery to be optimised on sites that have good public transport accessibility (with a PTAL rating of 3-6) and mixed-use redevelopment of car parks and public sector owned sites. This approach is also supported in the Council's Issues and Options document which identifies the need to intensify development areas around key overground and underground rail stations. The document further identifies redeveloping underutilised and low-density land such as surface car parks whilst also recognising the need to 'genuinely commit to deliver sufficient new housing to address our needs', for example related to size and tenure.
- 8.38 Running alongside this is the high quantum of our Borough (around 40%) that is designated Green Belt, which results in specific challenges in terms of the provision of substantial development, such as the proposal under consideration here. As Policy G2 of The London Plan restricts development in the Green Belt in accordance with

the NPPF, opportunities for the provision of housing are restricted which means the utilisation of inefficiently used brownfield sites becomes a priority.

- 8.39 Given the site is considered to be underutilised in terms of use and is in a well-connected transport node, Officers are satisfied that the loss of the existing car park has been appropriately justified in land use planning policy terms and is in accordance with the above policies.

Flexible Retail/Commercial Unit (Class E and/or Uses)

- 8.40 A flexible retail/commercial unit of 209sqm would be provided on the ground floor of Block 4, fronting Cockfosters Road and the new public space proposed between the station entrance and the building. The unit is within the area designated as a Local Centre and would be occupied by a use complementary to the local offer, such as a café, restaurant, retail or drinking establishment unit (Class E and/or Sui Generis uses) that would be open to the general public and accessed from the high street on Cockfosters Road.
- 8.41 Policy E9 of the London Plan supports the development of convenience retail in town centres including Local Centres as well as their enhancement to secure inclusive neighbourhoods and a sustainable pattern of provision to create less need to travel. This is reiterated in Core Strategy Policy 17 and DMD 25 of the Local Plan which both support the provision of appropriately scaled new local shopping facilities within Local Centres serving the local community and largely catering for those living within walking distance.

LUL Staff and TDA (Sui Generis)

- 8.42 The existing site (Site A) includes an existing building used by LUL staff and train drivers in support of the operation of the Station and the Piccadilly Line. The building contains office space and welfare facilities such as a canteen, staff changing rooms, and meeting rooms.
- 8.43 The existing facilities are proposed to be re-provided (715sqm) at lower ground and ground level within Block 3, segregated from the residential development by a separate entrance. These facilities are required for the continued effective and efficient operation of the London Underground services and no objection is raised to their re-provision within the proposed development.
- 8.44 In consideration of the above, the loss of the existing car park is considered acceptable in this instance as the redevelopment of the site to provide housing is aligned with existing and emerging policy and local, regional and national level. In addition, the development will provide policy compliant (40% based on habitable rooms) levels of affordable housing which will be secured by way of a Section 106 agreement. The provision of Affordable Housing is a key priority for the Council and as identified elsewhere in this report, given the high levels of Green Belt in the Borough, brownfield sites such as this are needed to provide housing which the Borough is currently under-providing, particularly Affordable Housing.

Suitability of the Site for Build to Rent housing

8.45 Policy H11 of the London Plan supports the provision of Build to Rent (BtR) housing and the justifying text for this policy encourages boroughs to take a positive approach to the sector to enable it to better contribute to the delivery of new homes. In doing so, it sets out a number of criteria for what can qualify as BtR (discussed below). The Mayor of London’s Housing and Viability SPG (2017) provides specific guidance on viability issues associated with BtR.

8.46 The adopted Local Plan does not contain policies on BtR, which is a relatively new type of housing that post-dates the Core Strategy (adopted in 2010) and the DMD (adopted in 2014). Notwithstanding this, whilst the Emerging Local Plan has very little weight at this stage, it does serve to indicate direction of travel in policy and the Council’s Local Plan ‘Main Issues and Preferred Approaches’ (Draft Strategic Policy SP H7) supports proposals for BtR blocks on large mixed tenure schemes providing that they meet a number of additional criteria (over and above H11 of the London Plan). These include:

- High quality housing and mix of dwelling sizes that meet local/strategic housing needs;
- On-site affordable housing in perpetuity in the form of Discounted Market Rent at genuinely affordable rent level, and;
- A review mechanism in the event that policy compliant levels of affordable housing cannot viably be provided. It also seeks to ensure that where a development proposal involving build to rent has potential to include more than one residential core and/or block, applicants should use this separate core and/or block to provide low cost rented housing to be managed independently by a registered provider of affordable housing.

8.47 **Table 3** below sets out the criteria required by Policy H11 of the London Plan:

Policy H11 of the London Plan criteria	Compliance
At least 50 homes	Yes (351)
Homes are held as BtR under a minimum 15-year covenant	Yes – subject to Section 106 Obligation
Clawback clause in place that ensures there is no financial incentive to break the covenant	
All units self-contained & let separately	
Unified management & ownership of the homes	
Tenancies of 3-years+ are available to all	
Rent & service charge certainty for the length of the tenancy	
On-site management	
Complaints procedure to be in place	
No up-front charges/fees.	

Table 3 – Build to Rent & Policy H11 of the London Plan criteria

8.48 Given the proposal would meet all of the criteria set out in Policy H11 of the London Plan, as shown in **Table 3** above, the provision of BtR housing on the site is considered to be acceptable, consistent with up to date London Plan policy and would contribute to the much-needed delivery of new homes within the Borough.

Summary of Principle

8.49 The Proposed Development accords with the objectives of the Development Plan and the NPPF as well as other relevant material considerations in relation to sustainable development by:

- Redeveloping a public sector owned brownfield site, currently occupied by surface car parks with poor quality public realm;
- Providing homes that are highly accessible and directly adjacent to existing public transport connections and easily accessible to local amenities and by sustainable travel modes;
- Providing a range of housing to support a mixed and balanced community; and
- Respecting the local natural and built environment by providing buildings that appreciate the heritage setting, increase the amount of open space and vegetation and are sensitively designed in response to the local context (which is dealt with further below).

8.50 Given the above considerations, the principle of development is considered to be acceptable and in line with relevant policies, most notably Policies GG2, GG4, E9, H1 and H11 of the London Plan, Core Strategy Policies 4.1 and 17 and Policies DMD 8 and DMD 25 of the Local Plan, the Mayor's Affordable Housing & Viability SPG and Paragraphs 60, 104, 105 and 120 of the NPPF. As such the Development is supported in principle terms subject to other detailed considerations as discussed below.

Housing Need, Delivery and Mix

Housing Need and Delivery

8.51 The NPPF (Paragraph 125) is clear that where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning decisions avoid homes being built at low densities and ensure that developments make optimal use of the potential of each site. In these circumstances...c) local planning authorities should refuse applications which they consider fail to make efficient use of land, taking into account the policies in this Framework. In this context, when considering applications for housing, authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site (as long as the resulting scheme would provide acceptable living standards).

8.52 Policy H1 of the London Plan sets a 10-year target (2019/20-2028/29) for the provision of 522,870 new homes across London as a whole (52,287 new homes each year) and 12,460 (or 1,246 per year) for Enfield. Core Strategy Policy 2 of the

Local Plan sets an annualised housing delivery target of 395 dwellings per year. Whilst Enfield's 2019 Housing Action Plan recognises that the construction of more affordable high-quality homes is a clear priority, only 51% of approvals in the Borough have been delivered over the previous 3-years.

- 8.53 Enfield's Housing and Growth Strategy (2020) was considered by Cabinet in January 2020 and approved at February's Council meeting (2020) and sets out the Council's ambition to deliver adopted London Plan and Core Strategy plus ambitious draft London Plan targets.
- 8.54 The Strategy sets five ambitions, the third of which is 'Quality and variety in private housing'. The key aims of the Strategy seek to address the housing crisis within the Borough. During consideration of the Cabinet report Members discussed the current housing situation and highlighted the rise in private sector rents in proportion to the average salary and the significant rise in homelessness. Enfield had one of the highest numbers of homeless households in the country. Insecurity and unaffordability of private sector housing has evidence-based links with homelessness. One of the most common reason for homelessness in London is currently due to the ending of an assured tenancy (often by buy to let landlords). MHCLG (2018) data shows a significant increase in the number of households in Enfield using temporary accommodation – with a significant 67% increase between 2012 and 2018.
- 8.55 The fourth and fifth ambitions of the strategy are in respect of Inclusive placemaking; and accessible housing pathways and homes for everyone. While the Housing and Growth Strategy is not a statutory document it sets the Council's strategic vision, alongside metrics, in respect of housing delivery. It was approved at a February 2020 Council meeting. Its evidence, data and metrics are considered relevant material considerations.
- 8.56 The 2018 London Housing SPG outlines a vision that delivers high quality homes and inclusive neighbourhoods by ensuring that appropriate development is prioritised. Policy GG1, GG2, GG3 & GG4 of the London Plan seek to promote the provision of quality new homes and for housing delivery to be optimised on sites that have good public transport accessibility (with a PTAL 3-6 rating).
- 8.57 The Government's 2021 Housing Delivery Test (HDT) results were published on 14 January 2022. Enfield (the place, not the council) delivered 1,777 homes in the past 3 years (2019-2021) against the 2,650 net additional homes target arising from the existing Local Plan. This amounts to 67% delivery against the target. Those LPAs failing to meet 75% of their housing targets in the preceding 3 years have been placed into a "presumption in favour of sustainable development" category and paragraph 11(d) of the NPPF is relevant.
- 8.58 Paragraph 11 of the NPPF states that plans, and decisions should apply a presumption in favour of sustainable development and paragraph 11 (d) makes clear that for decision taking this means where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, planning permission should be granted 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; or
 - ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.
- 8.59 The applicant intends to construct the proposed 351 residential units over a 3-year period, with an anticipated start date of September 2023 and completion date of April 2026. This would make a significant positive contribution towards delivering much needed additional homes within the Borough. Assuming that the intended programme is maintained, the proposed scheme would help meet the current London Plan 10-year housing target and the emerging Local Plan housing target as set out above.
- 8.60 It should also be noted that the Council's Local Plan 'Main Issues and Preferred Approaches' (Draft Strategic Policy SP H1), whilst very limited in weight, sets a target of providing at least 24,900 new dwellings in the plan period up to 2039, equating to 1,246 homes per year as per the London Plan annual equivalent target. In doing so, it identifies the Site (SA31) as indicatively providing 316 homes over the plan period.
- 8.61 As mentioned elsewhere in this report, Enfield is a celebrated green borough, with close to 40% of our borough currently designated Green Belt or Metropolitan Open Land, and a further 400 hectares providing critical industrial land that serves the capital and wider south east growth corridors. The reality of these land designations means the call on optimisation of the Borough's brownfield land is greater and brings complex development issues and a major shift in how Enfield's character will need to evolve.
- 8.62 Taking into account both the housing need of the Borough together with the track record of delivery against target, it is clear that the Council must seek to optimise development on brownfield sites, particularly those that are currently not being optimised. The land adjacent to Cockfosters Station is such a site.

Efficient Use of Land and Optimising Site Capacity

- 8.63 Objections have been received that the proposals would result in overdevelopment and excessive density within the Cockfosters area. Officers have assessed density and site capacity – and consider the proposals are aligned with adopted local and regional (London) policies and guidance in respect of density.
- 8.64 Officers have assessed that the proposal is aligned with requirements of the NPPF – that planning decisions should give substantial weight to the value of using suitable brownfield land within settlements for homes and that planning decisions should promote and support the development of under-utilised land, including through the more effective use of car parks.
- 8.65 This is in addition to the applicant following a design-led response, in accordance with the London Plan approach to optimising site capacity (see assessment below).

The NPPF (Paragraph 124) states that, in respect of density, consideration should be given to whether a place is well designed and '*the desirability of maintaining an area's prevailing character and setting...or of promoting regeneration and change*'.

- 8.66 Paragraphs 124 and 123 set out provisions for achieving appropriate densities – providing clear support for avoiding low densities in areas where there is existing or anticipated shortage of land for meeting identified housing needs. Paragraph 125(c) of the revised NPPF is relevant and states that local planning authorities should refuse applications which they consider fail to make efficient use of land, taking into account the policies of the NPPF.
- 8.67 In this context, when considering applications for housing, authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site (as long as the resulting scheme would provide acceptable living standards).
- 8.68 Policy D3 of the London Plan makes clear that development must make the best use of land by following a design-led approach that optimises the capacity of sites (which no longer refers to a density matrix as a guide). The policy states that a design-led approach requires consideration of design options to determine the most appropriate form of development that responds to a site's context and capacity for growth, and existing and planned supporting infrastructure capacity (as set out in Policy D2). In doing so it identifies a number of requirements in relation to form and layout, experience and quality and character.
- 8.69 Core Policies 4 and 30 of the Local Plan stress the need for high-quality housing and the need to maintain and improve the quality of the built and open environment. Policy DMD 37 of the Local Plan calls for a design-led approach to 'capitalising' on opportunities in accordance with urban design objectives relating to character, continuity and enclosure, quality of the public realm, ease of movement, legibility, adaptability and durability and diversity.
- 8.70 Policy DMD 6 of the Local Plan refers to the now superseded Density Matrix in the 2016 superseded London Plan. The current London Plan does not provide such a matrix, rather Policy D3 requires development to optimise and make the best use of land, considering design, to determine the most appropriate form for the site's context and capacity. This is echoed by Policy DMD 8 of the Local Plan which requires proposals to be in an appropriate location and of a suitable scale, bulk and massing. The latter is considered in detail in the 'Design and Conservation' Section below.
- 8.71 At present, the area around the Station is predominantly low density in nature with taller buildings opposite and adjacent to the site at Metro Point and Blackhorse Tower with a resolution to grant planning permission for 10 storeys (existing building being 9 storeys). The car-oriented community and a lack of smaller units and flats mean there is an opportunity for a greater mix of unit types and greater density at this site, given its location partially within a Local Centre and at a transport and service node as highlighted by Policy SD7 of the London Plan, the GLA's Housing SPG and the Mayor's Affordable Housing and Viability SPG. The prevailing heights

immediately adjacent to the Station are taller and the good connectivity provided by the station in particular provides an opportunity for a more optimum use of the site.

8.72 The Proposed Development achieves the following densities, paragraph 3.3.22 of the London Plan states that each of the following measures should be identified:

- Number of units (351) per hectare (1.36ha) = 258 units/ha
- Number of habitable rooms (877) per hectare = 644 hr/ha
- Number of bedrooms (526) per hectare = 387 bedrooms/ha
- Number of bedspaces (1,007) per hectare = 740 bedspaces/ha

8.73 Policy H10 of the London Plan promotes higher density development in locations, such as the application site, with a good PTAL score and in close proximity to a local centre in order to ensure the most efficient use of land and to optimise the provision of housing.

8.74 The scheme does not exceed 350u/ha, which is the definition of 'higher density' development in the London Plan. This means it falls below the density threshold set for increased scrutiny of design quality set in Policy D4 (Part D and E) of the London Plan.

8.75 The applicant has nevertheless still pursued a process of extensive design scrutiny, including three independent design review panel meetings. Enfield's Design Review Panel concluded, in their last review, that the height and scale of the scheme was appropriate for the surrounding context. The scheme is a high-quality well considered architectural response on a complex and challenging site. It proposes significant enhancements, which will benefit future and existing residents – including public realm enhancements.

8.76 The scheme, when assessed against adopted and emerging density policy, would not result in overdevelopment or excessive density. The scheme would result in a high-quality design, and well considered architecture and approach to the public realm, providing 351 residential units across the site. When considering the proposed density in the round alongside the site's good PTAL rating, its acceptable impact on residential amenity and its sufficient social infrastructure, it is considered that the scheme results in an appropriate and supportable level of development for the site. Further, the quantum of units proposed is acceptable in its specific local setting, subject to all other material planning considerations being met. In density terms the proposed development is in line with existing and emerging policy both at local and regional level.

Build to Rent (BtR)

8.77 BtR is supported in planning policy nationally, and regionally in London. Policy H11 supports BtR housing. The supporting text for the policy supports boroughs in taking a positive approach to BtR – so it can better contribute to the delivery of new affordable homes.

8.78 Policy H11 sets several criteria for what can qualify as BtR (see below). Policy H11

states that in respect of BtR, where a development meets the criteria set out in Part B of Policy H11, the affordable housing offer can be solely Discounted Market Rent (DMR) at a genuinely affordable rent, preferably London Living Rent level. DMR homes must be secured in perpetuity.

- 8.79 The Mayor of London's strong preference is for DMR homes to be let at London Living Rent levels. This is also strongly preferred by Officers, who are clear in viability discussion and negotiations about their aim to maximise the % of DMR homes to be let at London Living Rent levels. Intermediate rented products such as London Living Rent and Discounted Market Rent should be affordable to households on incomes of up to £60,000. The Mayor of London's Housing and Viability SPG (2017) provides specific guidance in respect of BtR, including on viability.
- 8.80 Officers have considered the affordability of the proposed Discounted Market Rent homes below. Adopted Enfield Local Plan policies (Core Strategy and Development Management Document) are silent on BtR, which is a relatively new housing type. Key relevant strategic policies and guidance (Policy H11 of the London Plan and the GLA's Affordable Housing and Viability SPG) have been adopted, or emerged, following adoption of Enfield's Core Strategy (adopted in 2010) and the DMD (adopted in 2014).
- 8.81 The Council's New Local Plan Issues and Options consultation document (2019/2020) signals an intention to include a policy that support BtR. While this document has very limited weight, paragraph 5.6.5 of that consultation document states:

"The Council supports Build to Rent and will positively promote this housing product through policy making, to support the delivery of the high quality, secure homes that Enfield residents need, in accordance with the London Plan and Mayor's SPG on Affordable Housing and Viability."

BtR – Occupants and Benefits

- 8.82 As noted BtR is a relatively new housing type, particularly within Enfield. Several BtR schemes have, however, been completed and occupied for several years in London. Officers have considered two post- occupancy surveys undertaken of established BtR schemes by LSE London/LSE Cities for the GLA. In this report published in June 2018, residents who choose to occupy higher density schemes, including BtR, cite a preference for living somewhere with good transport links as the top reason for choosing this type of home. The next three reasons are – 'Feeling safe in the neighbourhood', 'affordability' and 'having a home I can settle in for the long term'.
- 8.83 Post-occupancy surveys show that where a scheme is sustainably located that most respondents do not own a car. The top reason for not owning a car is 'other modes of transport are more convenient'. When those who do not own cars were asked the main reason why not, 78% of respondents said this was because other modes of transport were more convenient (being the top reason provided).
- 8.84 The suitability and benefits of BtR are as follows:

- BtR is forward funded and therefore less impacted by economic uncertainty and cycles than private sale. It has improved deliverability, meaning the delivery of much needed new homes and affordable homes is more likely;
- BtR can be delivered and occupied quickly to address the existing shortfall in Enfield;
- BtR schemes provide a long-term income stream that the Applicant can use to reinvest in long-term place making/maintenance of the Proposed Development to ensure it remains attractive for renters and the public, as well as London’s public transport network; and
- longer-term tenancies and placemaking provide more impetus for renters to stay longer, and the provision and breadth of supporting amenity spaces supports a sense of community.

8.85 As noted, the application site is in an area with excellent public-transport accessibility, supporting Officer’s assessment that as a BtR scheme with excellent access to public transport, a car-free scheme, comprising BtR at this location, is credible. Future residents would have lower car ownership, than would be the case if the scheme included shared ownership or market sale homes.

BtR Criteria

8.86 All 351 of the proposed units (or 877 habitable rooms) are BtR. **Table 4** below sets out the management and tenancy terms offered – against the criteria required by Policy H11 of the London Plan – and how the proposed development would meet, and in some cases exceed, those criteria.

Management and tenancy topic / criteria	Proposal	Commentary	BtR Policy H11 of the LP & AH & Viability SPG
Management Body	Connected Living London	Homes will be held in unified ownership and professionally managed by CLL daily on-site.	Complies with policy H11(B)(5) and (8)
Tenancy Type	1-5 Year AST	All tenants will be offered a tenancy of up to 5 years exceeding London Plan requirements.	Complies and exceeds the requirements of policy H11(B)(6)
Annual Rent Increases	Increases Formula Linked	Rent certainty will be provided to tenants for the period of their tenancy by clearly setting how annual rent increases will be calculated in the tenancy agreement.	Complies with policy H11(B)(7)
Letting Fees	None	No upfront letting fees will be charged to tenants. Deposits will be held securely in an appropriate Deposit Protection Scheme.	Complies with policy H11(B)(10)

Service Charges	None	All rents will be inclusive of service charges.	Complies with policy H11(B)(7) and DMR/ LLR requirements
Covenant Length	15 Years	The private homes will be required to be retained in rental use for 15 years. Affordable housing in perpetuity.	Complies with policies H11(A) and H11(B)(2)
Covenant Clawback	Clawback Mechanism	A Clawback mechanism will ensure there is no financial incentive to break the covenant. The mechanism will follow the Formula set out in the GLA's Affordable Housing SPG (2017).	Complies with policy H11(B)(3)
Housing numbers and containment	351 self-contained Homes	351 self-contained homes (877 rooms) with all units self-contained and let separately.	Complies with policy H11(B)(1) and (4)
Tenant Break	1 Months' Notice (After 6 Months)	A tenant only break will allow tenants to end the tenancy with a months' notice after 6 months.	Complies with SPG management standards (5)

Table 4 – Build to Rent & Policy H11 of the London Plan criteria

- 8.87 As set out above, the proposal complies with Policy H11(A) and the 11 parts of Policy H11(B) of the London Plan.
- 8.88 Housing quality is another important criterion in considering a BtR scheme. The Mayor of London's Homes for Londoners: Affordable Housing and Viability SPG sets out design quality criteria (Part 4) in respect of BtR schemes (the SPG sets five key principles for assessing a Build to Rent scheme). The SPG highlights the importance of achieving good quality development to support high quality BtR developments. A detailed assessment of the design element of the scheme is set out in the '*Design and Heritage*' Section below.

Summary of BtR

- 8.89 The proposed development would support Ambitions 1, 3, 4 and 5 of Enfield's 'Housing and Growth Strategy' (2020), endorsed by Council's cabinet (January 2020) and agreed at Enfield Full Council meeting (February 2020). The scheme is aligned with Ambition 3 of the strategy increasing the quality and affordability of private rented sector housing through development of a BtR scheme with housing products offered at a range of rental levels. BtR housing addresses an identified need for higher quality more secure private housing locally.
- 8.90 Officers have assessed that the proposal will deliver high-quality quality housing, available on long-term tenancies (up to five years proposed) – increasing security

and stability. Of the 351 units, 132 will be Affordable Housing with the remaining 219 units rented at competitive market rates. All of the proposed units would comply with relevant BtR qualifying criteria which will be secured in the s106 legal agreement where necessary. Subject to conditions and s106 planning obligations, the proposal is considered to accord with Policy H11 of the London Plan and the Mayor of London's Homes for Londoners: Affordable Housing and Viability SPG criteria and relevant guidance on BtR schemes and would provide high-quality new homes.

Affordable Housing and Tenure Mix

- 8.91 The NPPF identifies BtR as purpose-built housing that is typically 100% rented out. Annex 2 of the NPPF defines Affordable Housing as "*housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers)*". For BtR schemes affordable housing for rent is expected to be the normal form of affordable housing provision.
- 8.92 The Council has set a borough-wide affordable housing target of 40% (Core Strategy Policy 3 and Policy DMD 1 of the Local Plan). The Council will agree an appropriate figure, taking into consideration site-specific land values, grant availability and viability assessments, market conditions, as well as the relative importance of other planning priorities and obligations on the site.
- 8.93 Policy H5 of the London Plan sets out a strategic target for 50% of all new homes delivered across London to be affordable and Policy H6 sets a threshold for 50% affordable housing for public sector land. The site forms part of a portfolio of sites owned by TfL being brought forward to deliver new homes. The TfL portfolio as a whole is required to deliver at least 50% affordable housing. The CLL BtR Sites as part of that portfolio are required to deliver a minimum of 40% affordable homes (by habitable room) as part of the overarching 50% target. 50% is not therefore required to be achieved on this site.
- 8.94 Policy DMD 1 of the Local Plan is silent on BtR schemes. The supporting text to the policy notes that affordable housing comprises three tenures: social rent, affordable rent, and intermediate housing. Policy DMD 1 states that development should provide the maximum amount of affordable housing with an appropriate mix of tenures to meet local housing need.
- 8.95 In this context, Policy H11 of the London Plan and the Mayor of London's Homes for Londoners: Affordable Housing and Viability SPG (2017) have substantial weight in respect of the assessment of BtR schemes, and assessment of discounted market rent products as affordable housing and where in conflict, will superseded older local policy.

Affordable Housing Delivery in Enfield

- 8.96 In 2016/17, 30% of housing completions were affordable, whilst in 2017/18 this decreased to 7% of housing completions being affordable, amounting to 37 units in total being delivered. These figures show that the target 40% affordable housing

delivery is not currently being met in the Borough. The Housing and Growth Strategy (2020) sets out an ambition to increase the target of 50% of new homes to be affordable housing in the next Local Plan. Enfield's Housing and Growth Strategy (2020) states the Borough's ambition to develop more homes that are genuinely affordable to local people, so more people can live in a home where they spend a more reasonable proportion of their household income on housing costs.

- 8.97 In terms of tenure, Policy DMD 1 of the Local Plan sets a borough-wide target for affordable tenure mix and requires that negotiations should take into account the specific nature of the site, development viability and the need to achieve more mixed and balanced communities. The borough-wide target is for 30% intermediate tenure units.
- 8.98 Policy H11 of The London Plan allows development proposals that are BtR and meet the relevant criteria to provide homes solely at DMR at a genuinely affordable rent, preferably London Living Rent levels, and for homes to be secured in perpetuity. Paragraph 4.11.1 of the London Plan requires Boroughs to take a positive approach to the BtR sector.
- 8.99 The Mayor's Housing Strategy sets out the definition for 'genuinely affordable' homes and the advantages of delivering a range of development models, sites and types of homes. The London Plan expects at least 30% of DMR homes to be provided at an equivalent rent to London Living Rent at the time of first letting, with the remaining 70% at a range of genuinely affordable rents (Policy H11, Part C)). The Council's Core Strategy does not provide tenure requirements for covenanted BtR schemes.

Assessment: Maximising Affordable Housing

- 8.100 The Applicant has submitted a viability assessment which was scrutinised by the Council's independent viability consultants. The Council's independent viability consultants concluded the scheme cannot support more than 40% affordable housing, based on the tenure mix agreed and the specific nature of the site.
- 8.101 Some objectors have asserted that the existing use value and predicted rental levels applied within the viability assessment submitted are incorrect and that no grant is payable on the scheme. The Council's independent viability consultants have considered these matters and have accepted the existing value of the site stated and the assumptions relating to rental values and grant funding assumed.
- 8.102 The Council's independent viability consultants challenged a number of assumptions and inputs in to the financial appraisal of the scheme and held discussions with the Applicant regarding differences in appraisal assumptions such as capitalisation rates, profit rates in addition to information clarification requests. Following these discussions, the Council's independent viability consultants concluded that the scheme could not support more than 40% affordable housing on the basis of the tenure mix proposed.
- 8.103 The Mayor of London's Housing and Viability SPG (2017) provides specific guidance on viability issues associated with Build to Rent. It notes the specific development

economics associated with this type of affordable housing.

- 8.104 The site forms part of a portfolio of sites across London owned by TfL and brought forward by 'Connected Living London' to support the Mayor of London's ambition of increasing the proportion of affordable new homes in the capital. The portfolio seeks to deliver 50% Affordable Housing averaged across the whole portfolio city-wide (delivering a minimum of 10,000 homes across London).
- 8.105 The Proposed Development under consideration here will provide 40% affordable housing based on habitable rooms. The applicant has received confirmation from the GLA that the amount of grant available will be increased from £28,000 (assumed within the viability assessment) to £45,000 per unit. This has enabled the applicant to enhance the affordable housing proposals and make the proposed homes more affordable as set out below. The 'portfolio' approach is accepted by Local Planning Authorities across London with the 50% strategic target achieved at a pan-London level in accordance with Policy H5 of the London Plan. Officers consider that, subject to early and late stage viability reviews, that the 40% Affordable Housing (with grant) offer is in line with and exceeds London Plan requirements. Officers accept the BtR 'portfolio agreement' justification in this case.
- 8.106 Scheme layout, scale and density have been informed by site-specific constraints and challenges of this site – with viability implications. Cockfosters Station is a Grade II* listed building of unique importance in Enfield. It is one of the most highly regarded examples of Charles Holden's designs. Scheme design has been heritage-led, informing building layout, envelop and height and scale. The design and heritage aspects of the scheme have been assessed below but in summary Officers consider the scheme design, including its scale and density, represents a sympathetic response within the setting of this important designated heritage asset and the landscape improvements proposed at the entrance to the north of the site together with the provision of a public square to the south will have a positive impact upon the immediate setting of this listed building. This has viability implications.
- 8.107 Officers have assessed the scheme delivers the maximum reasonable amount of affordable housing in accordance with Policy H5 of the London Plan. Affordable housing negotiations are in line with Policy H5 of the London Plan, Core Strategy Policy 3 and Policy DMD1 requirements set out in the Local Plan that negotiations consider the specific nature of the site, development viability, grant and the need to achieve more balanced housing supply (see below).

Assessment: Tenure and Identified Housing Need (Enfield and Cockfosters)

- 8.108 Locally within Cockfosters Ward, Office for National Statistics (ONS) data (household composition by tenure data current at October 2020) indicates the area surrounding the application site is primarily owner-occupied housing (private) or private rented housing. The ONS data indicates that less than 1% of housing in the local area is intermediate housing. This percentage is also reflected across the Borough where intermediate housing stock represents a relatively low proportion – also 1%. Overall, housing composition in the local area is largely dominated by owner occupied housing.

- 8.109 The data shows a lack of affordable housing tenures in Cockfosters ward. Housing mix is considered below, but in summary ONS data also shows the local area has a relatively high proportion of 3-Bed (or more) family houses, typically with a front door and garden – showing a lack of smaller affordable homes to support housing choice and a socially sustainable and balanced housing supply.
- 8.110 The Housing Delivery Statement which accompanies this application demonstrates that there is a significant need in Enfield to increase the delivery of intermediate tenures to meet emerging housing need. Since preparation of the Enfield Strategic Housing Market Assessment (SHMA) in 2015, affordability has become more challenging in Enfield as house prices rose well beyond the England average. At the same time, eligibility for the housing waiting list was tightened in 2012 following the introduction of the Localism Act (2011).
- 8.111 Consequently, there are now around 68,000 households (approximately 52%) in Enfield who have incomes meaning they would be ineligible to be allocated social housing from the Council’s waiting list but cannot afford to buy. These households are typically first-time buyers and key workers including police officers, teachers, nurses and other health professionals. The existing rental housing stock is mainly low-quality, of which only 1% is intermediate and 18.9% private rented in Cockfosters ward. The current amount of private rented homes is insufficient in both amount and quality to meet growing housing need and is reducing due to national changes in the stamp duty and capital gains tax regimes. There is therefore a large local demand for housing from those who would be eligible for intermediate housing.
- 8.112 Analysis of the London SHMA identifies population projections finding that around 70% of newly forming households between 2011 and 2035 will be 1 and 2-person households without children, partly due to recent growth in concealed and overcrowded households. The Cockfosters Ward is largely dominated by owner occupied housing and the area already has a high proportion of 3+bed family houses. The evidence therefore shows that there is a local need for intermediate properties and smaller unit sizes to provide a more mixed and balanced community.
- 8.113 BtR is more affordable and flexible than other private rented stock, providing quality and security. As many of these residents will not have priority for social housing and cannot afford to buy property, the provision of good quality, secure and affordable rental homes is necessary. Intermediate housing addresses this need.
- 8.114 **Table 5** below provides a breakdown of the proposed mix of products and tenures for the BtR accommodation proposed:

Private Apartments	1 bed	2 bed	3 bed	Number of units	Hab rooms
Block 1	0	0	0	0	0
Block 2	55	34	5	94	232
Block 3	41	20	2	63	150

Block 4	41	21	0	62	145
Private total	137	75	7	219 (62%)	527 (60%)
Affordable (Blocks 1 & 3)	1 bed	2 bed	3 bed	Number of units	Hab rooms
DMR at London Affordable Rent Equivalents	0	0	10	10	40 (11%)
DMR at London Living Rent Equivalents	32	3	6	41	97 (27%)
DMR at 60% of Market Rent	0	0	12	12	48 (14%)
DMR at 70% of Market Rent	42	27	0	69	165 (48%)
Affordable total	74	30	28	132 (38%)	350 (40%)
Totals	211 (60%)	105 (30%)	35 (10%)	351	877

Table 5 – Breakdown of proposed mix of products and tenures for the BtR Accommodation proposed

8.115 The tenure mix within the affordable housing is in line with adopted local and London Plan policy. Officers have assessed that the proposed affordable tenures will address a demonstrated local need for proposed affordable housing, which would address the need for an underrepresented affordable housing product within the Cockfosters ward, and across Enfield providing a more balanced housing supply – in an area characterised by a lack of affordable homes generally, including smaller affordable homes and intermediate affordable housing.

Assessment: Affordability

8.116 Objections have been received raising concerns that the affordable housing will not be affordable to Enfield households. These include concerns that 85% of households in the Borough earn less than £60,000 and so would be unable to afford the affordable rents. Objections also reference the unaffordability of the proposed affordable housing relative to ‘median household income in Enfield of just £34,000, while the average salaries of key workers in London is just £27,000’.

8.117 The supporting text to Policy H6 of the London Plan provides definitions for affordable housing products, including the Mayor of London’s preferred affordable housing tenures. London Living Rent (LLR) is one of these, and offers Londoners on average incomes a lower rent, enabling them to save for a deposit. The text explains that - *as London Living Rent can be a step to homeownership, it can be considered as an affordable homeownership product.*

8.118 In respect of DMR, not offered at LLR equivalent rents, paragraph 4.6.8 explains that *‘all intermediate rented products such as London Living Rent and Discounted Market Rent should be affordable to households on incomes of up to £60,000.* Paragraph 4.6.9 goes on to explain that *‘for dwellings to be considered affordable, annual*

housing costs, including mortgage (assuming reasonable interest rates and deposit requirements), rent and service charge, should be no greater than 40 per cent of net household income, based on the household income limits set out above'.

Affordability: Relative to Income

- 8.119 As set out above, the London Plan states that all intermediate rent products should be affordable to households on incomes of up to £60,000. £60,000 household income is a cap, not an average or minimum. In comparison, Shared Ownership housing, has a higher cap of £90,000. The Council supports Shared Ownership housing as an acceptable intermediate affordable housing product. When assessed relative to income, DMR has the potential to provide a more affordable and flexible housing product.
- 8.120 In considering affordability, Officers have reviewed per week rent charged plus service charge per annum to arrive at an annual housing cost per unit. The rent and service charges used are those that formed the basis of viability discussions with the Applicant. Officers have then considered this as a % of income. Officers note the current Policy DMD 1 position sets a higher cap of £90,000 for intermediate affordable housing products.
- 8.121 Within the immediate locality, data from Enfield Council's Knowledge and Insight Hub (2021) indicates Cockfosters ward has the 3rd highest average (median) household income of the 21 wards in Enfield. Average household income in the ward is above the median level for the borough as a whole and higher than the London average. Based on this evidence, officers have assessed that the DMR homes would make a meaningful contribution towards the supply of affordable housing within Cockfosters ward, having regard to the relevant policy and guidance tests.

Affordability: Relative to Market Rent

- 8.122 When considered in respect of Enfield wide affordability the supporting text to Policy DMD 1 of the Local Plan is relevant. While the policy is silent on BtR and DMR, supporting text comments on rent affordability are relevant (para 2.1.4). It states *'Evidence shows that larger units at rent levels of 80% of market rent will be unaffordable to most families. For residents earning the median borough income, 78% of market rent for 2 bed units, 60% of market rent for 3 bed units and 49% of market rent for 4+ bed units would be affordable'.*
- 8.123 The originally submitted planning application proposed 40% Affordable Housing by habitable room (132 Units of which 30% were proposed to be discounted to London Living Rent Equivalents with the remaining 70% at 65-70% of Open Market Rent (subject to unit size). This included household income requirements of between £35,100 and £42,900 for the DMR at London Living Rent equivalent units and an income requirement of between £37,596 and £50,388 for the remaining DMR units. The offer was supported by GLA grant of £28,000 per unit. The proposals fully complied with the requirements of the London Plan (2021).
- 8.124 Notwithstanding this, the applicant has been working closely with the Council Officers

and the GLA to explore options available for enhancing the affordable housing proposals.

- 8.125 The applicant has since received confirmation from the GLA that the amount of grant available will be increased to £45,000 per unit. This has enabled the applicant to enhance the affordable housing proposals as set out below.
- 8.126 The affordable housing proposals have been enhanced to provide proposed 40% Affordable Housing by habitable room (132 Units) of which 39% are proposed to be discounted to London Affordable Rent (11%) or London Living Rent Equivalents (27%). The remaining 61% are proposed at 60-70% discounts.
- 8.127 The applicant has provided details of rent and income levels to demonstrate affordability and eligibility with Policies H5 and H11 of the Mayor’s affordability criteria. These are set out in **Table 6** below:

DMR at London Affordable Rent Equivalents (inclusive of Service Charge)			
	% market rent	Rent per week	Household income required *
1 bed	n/a	n/a	n/a
2 bed	n/a	n/a	n/a
3 bed	43%	£221	£20,500
DMR at London Living Rent Equivalents (inclusive of Service Charge)			
1 bed	66%	£225	£21,000
2 bed	60%	£250	£23,200
3 bed	53%	£275	£25,550
DMR at 60% of Market Rent (including Service Charge)			
1 bed	n/a	n/a	n/a
2 bed	60%	£251	£23,300
3 bed	60%	£312	£28,950
DMR at 70% of Market Rent (including Service Charge)			
1 bed	70%	£240	£22,300
2 bed	70%	£293	£27,150
3 bed	n/a	n/a	n/a

Table 6 – Indicative Rent and income levels for the BtR Accommodation proposed

*Assuming incomes based on household costs being no more than 28% of income

- 8.128 70% of the affordable homes at Cockfosters are proposed as DMR (1- and 2-bedroom homes set at 70% of market rent). The 2-bed units discount of 70% represents a larger discount (more affordable) than the 78% of market rent for 2 bed units described as affordable in the DMD to ‘residents earning the median borough income’. In respect of the 3- bedroom DMR homes, these are offered at a discount of 60% of market rent in line with the rent for 3-bed units described in the DMD. Officers have also agreed early and late stage reviews, that have potential to direct any surplus to further improve the level of discount for 3-bed DMR units or increase the % of DMR LLR 3-bed units.
- 8.129 London Living Rent is the Mayor of London’s preferred DMR and is set by the GLA,

on a ward by ward basis. 30% of the affordable homes at Cockfosters are proposed at rent levels equivalent to London Living Rent for the Cockfosters ward where the site is located. Officers are satisfied these units represent genuinely affordable rent units – particularly in respect of Cockfosters ward, that exceed London Plan requirements.

Summary of Affordable Housing

- 8.130 The proposed Affordable Housing offer of 40% is based on habitable rooms which equates to approximately 38% of overall units. In terms of unit numbers this results in 132 of the proposed 351 units being genuinely affordable.
- 8.131 Officers have assessed the scheme in accordance with Policies H5 and H11 of the London Plan. Affordable housing negotiations are in line with Policy H5 of the London Plan as well as Core Strategy Policy 3 and Policy DMD 1 of the Local Plan that negotiations take into account the specific nature of the site, development viability and the need to achieve more balanced housing supply (see above and below).
- 8.132 Additionally, Policy H11 of the London Plan which as the most applicable and up to date adopted policy must be given significant weight in the assessment of BtR states that where housing is accepted by a Local Planning Authority as BtR (see assessment above) – affordable housing can be solely DMR at a genuinely affordable rent, preferably at London Living Rent level. Enfield's adopted policies, including Development Management Document Policy DMD 1 (Affordable Housing) are silent on Build to Rent schemes. Policy DMD 1 is also silent on preferred Discounted Market Rent levels and London Living Rent as preferred affordable housing products for Build to Rent schemes.
- 8.133 Officers have assessed that the affordable housing offer, including overall % and tenure represents the maximum reasonable amount of affordable housing deliverable – considering the specific context and character of the site and details of the scheme.
- 8.134 Negotiations have taken account of the site's individual circumstances and has included consideration of the provision for re-appraising the viability of the scheme prior to implementation (early and late stage viability reviews agreed) and other scheme requirements.
- 8.135 The details of the Affordable Housing offer will be captured by way of planning obligations. The Section 106 agreement will also contain review mechanisms (early and late), which will enable the Council to capture any uplift in value afforded to the site after planning permission has been granted.

Housing Mix

- 8.136 The Proposed Development includes 60% one bed (211 units), 30% two bed (105 units) and 10% three bed units (35 units). The mix of sizes takes into account: i) growing demand for smaller homes; ii) high number of large family houses available in the area; iii) the site's highly accessible location; and iv) the positive role one- and two-bedroom homes play in providing housing for down sizers and overcrowded

concealed households, as recognised in the London SHMA. In a BtR scheme adjacent to an Underground station (as is the case with the Proposed Development) one and two bed units are generally considered to be more appropriate (Policy H10 of the London Plan, Affordable Housing and Viability SPG and London Housing SPG).

- 8.137 Officers have sought to maximise affordable family housing in the scheme. 28 of the 35-family housing (3-bedroom) units within the scheme (13.6% of the affordable homes) are offered as affordable (7 x LLR and 21 x DMR of 65%). Officers have secured early and late stage viability reviews, with any surplus recommended to be directed towards improving the affordability of family housing, through lower % DMR for 3-beds; increased numbers of DMR at LLR level 3-beds. There are no private 3-bed/5-person homes proposed in the scheme, all family homes are affordable.
- 8.138 The remainder of the scheme responds to local demand for 1 and 2-bed units in line with predicted smaller household sizes and to provide a wider mix of unit sizes than is currently evident in the ward.
- 8.139 The Affordable Housing and Viability SPG highlights that in respect of BtR schemes, local policies requiring a range of unit sizes should be applied flexibly to BtR schemes in preferable BtR locations to reflect demand for new rental stock, which is much greater for one and two beds than in owner-occupied or social/ affordable rented sector. The SPG notes that BtR can be particularly suited to development on the edge of town centres or near transport nodes. In addition, LPAs should take account of the distinct economics of BtR, where potential yields and investment risk can be affected by increases in the number of large units within a scheme.
- 8.140 The Council's Core Strategy Policy 5 and Policy DMD 3 of the Local Plan set out targets for housing mix however, the Council's Strategic Housing Market Assessment (SHMA) which post-dates these policies, illustrates an annualised requirement, between 2016-2041, for new homes to be 55% 1-bedroom, 16% 2-bedroom and 14% 3-bedroom. Officers have also considered the existing high proportion of existing 3+bed family houses in Cockfosters ward and GLA Strategic Housing Market Assessment (SHMA) predictions that between 2011-2035 around 70% of newly forming households will be 1 and 2-person households without children.
- 8.141 The proposed homes would provide greater choice for people wishing to live in the area who are not part of a larger household. Developments in highly public transport accessible locations and close to facilities are also more suitable for smaller units where car ownership and use is lower – which in turn supports the car-free approach proposed for the scheme. All of the units in the development, including larger size units have appropriate private amenity spaces.
- 8.142 The proposed mix of units is appropriate in accordance with the Policy H10 of the London Plan and will meet an identified demand for one and two bed units and contribute to a mixed and diverse community in an area currently dominated by three bed and larger housing provision.
- 8.143 The Proposed Development accords with the outline housing mix requirement

identified by the Mayor's Affordable Housing and Viability SPG. The Proposed Development would comply with the relevant local and national policies in relation to housing delivery.

Residential Quality and Amenity for Future Occupiers

- 8.144 Policy D6 of the London Plan sets out housing quality and design standards that housing developments must take into account to ensure they provide adequate and functional spaces; sufficient daylight and sunlight; avoid overheating; and maximise the provision of outside space without differentiating between tenures. Housing should also maximise the provision of dual aspect dwellings and normally avoid the provision of single aspect dwellings except where it is considered a more appropriate design solution to optimise site capacity. In the instance of single aspect dwellings, it should be demonstrated that they will have adequate passive ventilation, daylight and privacy, and avoid overheating.
- 8.145 The Local Plan contains several policies which also aim to ensure the delivery of new housing of an adequate quality, namely Policy DMD8 (General Standards for New Residential Development), DMD9 (Amenity Space) and DMD10 (Distancing).

Internal Floorspace Standards

- 8.146 All of the proposed residential units will either meet or exceed the minimum required floorspace standards. 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). Minimum floor to ceiling heights for all proposed homes will be 2.5m in compliance with the guidance.
- 8.147 The Proposed Development includes 10% of units (36 units) as wheelchair accessible (M4(3)) and 90% (315 units) as wheelchair adaptable (M4(2)) as required by Policy D7 of the London Plan. The design is inclusive and accessible, with consideration for the diverse population, facilitating social interaction and inclusion (Policy D5 of the London Plan) and accords with Core Strategy Policy 9 of the Local Plan, encouraging development to provide access for all members of the community.

Units per Core

- 8.148 All floors which share a single core within the proposal have 8 or fewer units (Housing SPG Standard 12). A number of floors include two cores and are explained as follows:
- Of the 12 floors of Block 1 include 9 units sharing a single core.
 - 4 of the 12 floors of Block 2 have between 10 and 12 units, which include two stair cores and two lifts serving every floor.
 - 5 of the 13 floors in Block 3 have between 11 and 12 units also include two stair cores and two lifts serving every floor.
 - A stair is provided centrally to each part of the building meaning residents would not usually pass more than one or two other front doors before reaching their own.

- Within all buildings at sixth floor level and above, there are only six units per floor/core.

- 8.149 The corridors have been designed with windows at either end to provide daylight and opportunities for cross ventilation. Within Block 2, the building has been designed to allow easy access from each floor directly to the rooftop amenity, without the need to go down to ground floor level.
- 8.150 The access to homes is also served by the concierge which would manage the development from Block 2, and an entry phone and fobbed access system is proposed. The BtR housing includes shared internal amenity spaces (440sqm) which fosters a sense of community between residents and provides a safe space for people to use and a feeling of security.
- 8.151 While the proposal does not provide eight units per core on all floors as required by London Plan policy, the proposed corridors provide natural daylight and ventilation, which is welcomed and supported by the GLA. On balance, it is considered that this approach enables the design to meet or exceed the residential amenity standards, whilst also ensuring the scheme responds to heritage and landscape sensitivities and securing 40% affordable housing.

Aspect, Daylight and Sunlight

- 8.152 Policy D6 of the London Plan states that the design of development should provide sufficient daylight and sunlight to new housing that is appropriate for its context, whilst avoiding overheating, minimising overshadowing and maximising the usability of outside amenity space. It states that housing development should maximise the provision of dual aspect dwellings and normally avoid the provision of single aspect dwellings. North facing single aspect units should be avoided.
- 8.153 Overall, the scheme provides 62.7% of units as dual aspect. 2.6% are enhanced single aspect. Amendments have been made during the course of the application to reduce the overall number of north facing single aspect units from 7.4% to 3.2% of units (defined as within 45 degrees from north, this includes north west and north east facing units) – this equates to 12 units overall. None of these single aspect units would face directly north.
- 8.154 While the Mayor's Housing SPG recommends that single aspect north facing units should be avoided, the applicant contends that these units will benefit from large windows with open views onto the nearby Trent Park, and meet or exceed the BRE target ADF as discussed below. The small amount of single aspect north facing windows would therefore be acceptable in this instance and no objection has been raised to this by the GLA.
- 8.155 The application is accompanied by a daylight and sunlight assessment undertaken by GIA that assesses the quality of the internal residential environment for future occupiers in accordance with the BRE guidelines. This assessment has been reviewed by the Council's appointed sunlight and daylight consultants Hollis. All the habitable rooms within Blocks 1, 2, 3 and 4 of the proposed development have been

assessed for daylight using the BRE ADF, NSL and RDC criteria.

- 8.156 Of the 895 habitable rooms assessed for daylight, 92% will meet or exceed the recommended daylight quantity (ADF), 97% of habitable rooms will meet or exceed the recommended sky visibility (NSL) and 100% have been designed with good proportions of uniform daylight distribution, in accordance with the Room Depth Criterion (RDC) where applicable. The majority of the rooms within the development will therefore achieve the relevant BRE guidance targets. Where daylight is hindered, explanations have been given regarding the short falls to living areas including living room/kitchen/diners (LKD), living rooms and bedrooms, and these are deemed acceptable. Furthermore, it is recognised that the NPPF (paragraph 125) advises that the numerical guidelines within the BRE guidance should be applied flexibly.
- 8.157 In relation to sunlight, an APSH assessment has been undertaken to all habitable rooms within Blocks 1, 2, 3 and 4 of the Proposed Development. This includes all bedrooms and rooms facing within 90 degrees of due north.
- 8.158 In their report, GIA states that whilst results have been produced for all habitable rooms, it should be noted that this is mainly appreciated within living areas and the greatest expectation for sunlight is within south-facing rooms. GIA have also explained that of those living areas with a southerly aspect:
- 92% will meet or exceed the recommended level of sunlight over the whole year (APSH);
 - 92% will meet or exceed the recommended level of sunlight during the winter months (WPSH); and
 - 91% will meet or exceed both the sunlight criteria above.
- 8.159 Whilst the above results are considered to be very good results for a scheme of this size, they do not fully disclose the true total number of flats within the proposed scheme that are unlikely to receive adequate sunlight when assessed strictly against the BRE guidelines. The exclusion of commentary on habitable rooms facing within 90 degrees of due north, gives a positive perspective of the overall likely sunlight levels.
- 8.160 The GIA report states that over 91% will meet the sunlight targets recommended in the BRE guide, however, when all habitable rooms are taken into consideration this figure reduces to 58%. That said, full compliance with the sunlight standard is hard to achieve within an urban location such as this. It is therefore unrealistic to expect full sunlight compliance for this location and, as such, a flexible approach should be applied as per the approach suggested within the NPPF. Paragraph 125 of the NPPF allows flexibility in the application of the BRE guidelines so long as the resulting scheme would provide acceptable living standards, which is the case for the Proposed Development.
- 8.161 Paragraph 3.1.11 of the BRE guidance suggests that if a room faces significantly North of due East or West it is unlikely to meet the recommended levels proposed by the BS 8206-2. In addition, sunlight is generally most appreciated in living areas and the greatest expectation of sunlight is in south-facing rooms. Therefore, all living

areas with a southerly aspect have been tested for their access to sunlight and commentary is provided for these.

8.162 Results have been provided for all habitable rooms in the submitted GIA report and commentary on the results for all habitable rooms is provided. When looking at sunlight levels within the scheme, of the 895 habitable rooms:

- 62% will meet or exceed the recommended level of sunlight over the whole year (APSH);
- 62% will meet or exceed the recommended level of sunlight during the winter months (WPSH); and
- 58% will meet or exceed both sunlight criteria above.

8.163 These results are in line with expectations for the proposed building typology as an efficient floorplan design and will inevitably foresee a number of units that do not face within 90 degrees of due south and so have a more restricted access to sunlight. These units will typically still receive some sunlight either in the morning (if east-facing) or in the afternoon (if west-facing). The BRE states that sunlight is viewed as less important in bedrooms and kitchens and specifies that in housing, the main requirement for sunlight is in living rooms.

8.164 When looking at sunlight levels within the 351 main living areas (260 Living/Kitchen/Dining rooms and 91 living rooms):

- 81% will meet the recommended levels of sunlight over the whole year (APSH); and
- 76% will meet or exceed the recommended level of sunlight during the winter months (WPSH).

8.165 This demonstrates how the design has sought to position the living areas where they can benefit from greater levels of sunlight, in line with BRE's recommendation. Overall, the levels are considered to be good for a scheme of this size and typology.

8.51 As such, as the units are considered to provide good quality residential living space, this digression is considered to be acceptable in this particular instance.

Overshadowing – Public and Communal Amenity Areas

8.166 In relation to overshadowing of communal amenity areas within the site, both public and communal areas were tested, and it was found that all proposed areas exceed the suggested (BRE guideline) target for both 21st March and 21st June. This means that the public and communal amenity areas will be well sunlit throughout the year.

8.167 Overall, the amenity spaces within the scheme will benefit from good levels of sunlight.

Overlooking and Privacy

8.168 The Mayor's Housing SPG advises that habitable rooms should be provided with suitable privacy. 18-21m is indicated as a suitable minimum distance between facing

habitable rooms, although the standard notes that “adhering rigidly to these measures can limit the variety of urban spaces and housing types in the city and can sometimes unnecessarily restrict density”.

8.169 Within the application site, a separation distance in excess of 18m is achieved between the majority of habitable room windows of Blocks 1, 2 and 3 as shown in **Figure 5** below. At its closest point, the corner of Block 3 would be 12.3m from Block 1, however, through the careful orientation of the two buildings on the site and positioning of windows and balconies, the proposal would minimise the potential for overlooking, which will allow for privacy in line with the standards in the Mayor’s Housing SPG.



Figure 5 – Separation Distances within the Development

8.170 Similarly, with respect to the possible implications on amenity by way of overlooking and impact on privacy to existing neighbouring occupiers, this has also been addressed through the careful positioning of windows and balconies to minimise the potential for overlooking. The development would provide a 15.6m separation distance with Blackhorse Tower to the south and the windows and balconies of Block 4 have been appropriately positioned and designed to minimise the opportunity for overlooking should this neighbouring building be converted to residential use in the future.

8.171 With the exception of 4 units in Block 1, there are no residential units proposed at ground floor level. Landscaping is proposed in front of these units to minimise the potential for overlooking from users of the public space to be located in front of this building. Details of the landscaping will be secured by condition to ensure it is

sufficient to minimise any privacy concerns pertaining to these units.

Children's Play Space

- 8.172 Policy S4 of the London seeks to ensure that development proposals include suitable provision for play and recreation, and incorporate good-quality, accessible play provision for all ages, of at least 10sqm per child that is not segregated by tenure.
- 8.173 The Proposed Development includes play space that complies with and exceeds the 10sqm per child minimum requirements set out in Council's Local Plan, the Shaping Neighbourhoods: Play and Informal Recreation SPG (2012) and the London Plan. The GLA population yield calculator (v.3.2 October 2019) has been used to estimate the possible number of children that could be generated by the Proposed Development.

Age	Child yield (London: PTAL 3-4)	Play space required (10sqm per child)	Maximum walking distance from site	Proposed play space
Under 5	29	290sqm	100m	300sqm (doorstep play)
5-11	20	200sqm	400m	250sqm
12+	8	80sqm	800m	80sqm
Total	57	570sqm	n/a	630sqm

Table 7 – Children's Play Space provision within the development

- 8.174 As shown in **Table 7** above, the proposal would provide 630sqm of dedicated play space for children aged 0 to 12+, which exceeds the 570sqm of play space calculated requirement based on the development's child yield from the Shaping Neighbourhoods: Play and Informal Recreation SPG. Play provision is integrated within the landscape design suitable for all ages, and accessible to the wider community. A s106 requirement would be secured in any permission granted to ensure that all play space is retained in perpetuity.

External Residential Amenity Space

- 8.175 All units would be provided with a minimum of 5sqm of private external amenity space in the form of a balcony directly accessible from each flat with an additional 1sqm for each additional occupant over 2 people. Proposed balconies would be well proportioned to enable practical and flexible use by residents.
- 8.176 All homes would also have access to 318sqm of additional shared external amenity provided to the roof of Block 2 (shoulder building, fifth floor) in the form of a terrace. This space would be open and accessible to all residents of the Proposed

Development, offering seating and enclosed by planting, with views across Trent Park and into the site's own landscape. Officers are broadly comfortable with this approach. The applicant has indicated where further secure communal amenity space could be provided at ground level and it is proposed that this is further explored and secured by condition.

- 8.177 The Proposed Development would additionally provide 4,200sqm of external amenity space open to use by both its residents and the general public. Areas of seating, orchards and informal planting have been designed, maximising the opportunity for south-facing landscape spaces created around and between the buildings. In order to maximise the amount of usable space, vehicular access has been confined to the periphery and reduced as far as possible in line with the Healthy Streets objectives. The proposed planting has been selected to increase the ecological connectivity with the adjoining park and Site of Importance for Nature Conservation.

Tenure Distribution

- 8.178 The affordable housing provision needs to be managed by an appointed Registered Provider, meaning that the affordable accommodation should be located together for management purposes. 40% of the units (by habitable room) are affordable. Affordable units are located in Block 1 (to the north east of Site A) and Block 3 (south of Site A). 100% of the units in Block 1 are affordable; 44% of the units in Block 3 are affordable, and the remaining 56% are market tenure units. All homes will be designed using the same palette of materials and will have the same access to shared amenities and play spaces, meaning that the development will promote a mixed and inclusive community. The distribution of tenures and the design specification of the homes is therefore fully consistent with all relevant planning policies and design guidance.

Noise and Disturbance

- 8.179 Policy ED7 of the London Plan seeks to reduce, manage and mitigate noise.
- 8.180 The Noise and Vibration Assessment produced by Atkins in support of the application confirms that internal noise levels within dwellings will not result in an adverse effect on health and quality of living for occupants, subject to suitable sound insulation. The Council's Environmental Health Section have reviewed the Assessment and have raised no objection to the proposal. Some balconies are anticipated to experience noise levels above the values typically considered desirable in external amenity areas. However, residents will have access to substantial amounts of quiet, protected external amenity which experiences good levels of sunlight. A variety of private shared and publicly accessible spaces are provided within the development, accessible to all residents.
- 8.181 In accordance with the relevant environmental noise criteria, the Proposed Development is not anticipated to cause or be exposed to adverse effects.

Overheating

8.182 The overheating assessment provided within the submitted Energy Strategy confirms that all proposed units can achieve a suitable internal environment using natural ventilation and mechanical ventilation with heat recovery. This is discussed in further detail in the 'Sustainability and Climate Change' section below.

Fire Safety

8.183 In accordance with Policies D5 and D12 of the London Plan, the applicant has submitted a Fire Statement produced by a third party suitably qualified assessor, which is welcomed. This includes details of; the construction methods, products and materials; the means of escape for all building users, including evacuation lifts; features which reduce the risk to life, including sprinklers; access arrangements for fire service personal and fire appliances and how future modifications to the building will not compromise the base build fire safety and protection measures. The Council's Building Control section has reviewed the fire statement and is satisfied with its content. It is recommended that a final fire statement is secured through a planning condition for a more detailed response at a later stage.

Secure by Design

8.184 The Designing Out Crime Officer has advised that they are supportive of the development in principle. A condition is to be imposed to ensure that the development complies with SBD principles.

Summary of Residential Quality and Amenity

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

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

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

8.188 The proposed units have been designed in accordance with required policy

standards including Policy DMD 8 of the Local Plan and Policy D6 of the London Plan, and represent a good quality development, with good levels of residential amenity and recreational facilities offered in the form of open space that will be accessible to both residents and the wider public. Whilst there are some exceptions to the compliance of the proposals, such as some single aspect units, Officers consider these are outweighed by the overall quality of the accommodation, including high levels of good quality outdoor amenity space, as well as the benefits delivered in terms of housing delivery and other benefits of the scheme.

Design and Heritage

8.189 Paragraph 122 of the NPPF states that consideration should be given to whether a place is well designed and ‘the desirability of maintaining an area’s prevailing character and setting...or of promoting regeneration and change’. Chapter 12 of the NPPF (Achieving well-designed places) goes on to set out the need for good design as the key to sustainable development. Paragraph 130 states that planning decisions should ensure that developments:

- a) Will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
- b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
- c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);
- d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;
- e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks.

8.190 Good design is central to all objectives of the London Plan and the Council’s Local Plan policies. Chapter 3 of the London Plan sets out key urban design principles to guide development in London. Design policies in this chapter seek to ensure that development optimises site capacity; is of an appropriate form and scale; responds to local character; achieves the highest standards of architecture, sustainability and inclusive design; enhances the public realm; provides for green infrastructure; and respects the historic environment.

8.191 Policy D3 of the London Plan requires development to optimise and make the best use of land, considering design, to determine the most appropriate form for the site’s context and capacity. This is echoed by Policy DMD 8 of the Local Plan which requires proposals to be in an appropriate location and of a suitable scale, bulk and massing.

8.192 Policies D1 and D2 of the London Plan seek to ensure that new developments are well-designed and fit into the local character of an area. Policy D3 requires developments to optimise capacity through a design-led approach, by responding to

a site's context, capacity for growth and supporting infrastructure capacity, which is echoed by Policy GG2. New buildings and spaces should respond to the form, style and appearance to successfully integrate into the local character of an area, have a positive relationship with the natural environment and respect and enhance the historic environment.

- 8.193 Policy D8 of the London Plan, Core Strategy Policies 9 and 25, and Policy DMD 37 of the Local Plan require new developments to deliver new public realm wherever possible. New public realm should be of high quality, easy to understand, safe, attractive, uncluttered and effective. Public spaces should prioritise movement by pedestrians and cyclists to encourage active travel, and improvements at and around public transport interchanges are particularly supported to improve safety, security and wayfinding.
- 8.194 Policy D4 of the London Plan requires development proposals to demonstrate that they meet the design requirements of the London Plan. Design should be thoroughly scrutinised by borough planning, urban design and conservation officers and expert advice where appropriate. The design review process should be used to assess and inform design options early in the planning process. The scheme meets the criteria to require that the Proposed Development must have undergone a local borough process of design scrutiny in accordance with Policy D4 (Part E) of the London Plan. Policy DMD 38 requires design and access statements to clearly document the design evolution. It states that the advice of the design review panel will be a material consideration when assessing applications.
- 8.195 Policy DMD 37 of the Local Plan sets out the requirements for achieving high quality design including ensuring proposals are appropriate to their context and have appropriate regard to their surroundings.
- 8.196 Policy D9 (Part A) of the London Plan requires Development Plans to define what is considered a tall building for specific localities. The sub-text to Policy DMD 43 of the Local Plan (Paragraph 6.4.1) states that "*tall and large are those that are substantially taller than their surroundings, cause a significant change to the skyline or are larger than the threshold sizes set for the referral of planning applications to the Mayor*". Referable applications are those including development over 30m in height.
- 8.197 Policy D9 (Part B) of the London Plan requires Development Plans to identify on maps, locations where tall buildings may be an appropriate form of development. The Council has not yet prepared such a map that meets the requirements of Policy D9.
- 8.198 Policy DMD 43 of the Local Plan takes a blanket presumption against tall buildings in areas classified as inappropriate are unacceptable. The policy applies to buildings over 30m in height or a building defined as 'tall' by the Council's Local Plan. The areas identified as being inappropriate include those within and adjacent to the Green Belt, within the boundary or in the immediate vicinity of Conservation Areas, Listed Buildings and Registered Parks and Gardens. The onus is placed on the developer to demonstrate how the proposal avoids negative impacts in accordance with this policy.

- 8.199 Part 4 of Policy DMD 43 sets out criteria which development must meet to assess the suitability of individual sites. In the Council's report on the location of tall buildings and important local views (2013), which is referenced in the sub-text of Policy DMD 43 (paragraph 6.4.4), it identifies Holbrook House/Black Horse Tower (reference 48 in Map 15.5 and Table 15.1 in Appendix 15), which adjoins the site to the south, as being an 'inappropriate' existing tall building. Policy D9 (Part C) of the London Plan, however, takes a different approach requiring development proposals for tall buildings to address visual, functional, environmental and cumulative impacts. It also states that tall buildings should reinforce the spatial hierarchy of the local and wider context, be constructed of high-quality materials and ensure the architectural integrity of the buildings can be maintained in perpetuity.
- 8.200 The Council's Emerging Local Plan Policy D2 states that the Council will seek to contribute to the growth agenda by *"a) ensuring more tall buildings and higher density development are realised in appropriate places in the borough through innovative high-quality design, taking into account local character and context. Tall buildings are defined as substantially taller than their surroundings"*.
- 8.201 When read as a whole, the Development Plan supports the optimisation of sites that are previously developed, located in local centres and well connected by public transport, as is the case here. However, the importance of sensitive design is also given weight in determining whether the specific proposals are appropriate for their location.
- 8.202 At present, there is a conflict between the somewhat out-of-date blanket presumption against tall buildings policy approach taken by Policy DMD43 of the Local Plan and the approach taken by Policy D9 of the London Plan requiring Councils to identify appropriate locations for tall buildings and then assessing their impacts as set out above. As stated in the *Hillingdon* decision, for the purposes of policy D9, a proposal can be in a location which is outside those areas identified as appropriate for tall buildings but be acceptable when its impacts are assessed under part C of the policy.
- 8.203 In such cases where there is a conflict in policy approach, Section 38 (5) of the Planning and Compulsory Purchase Act 2004 states *"if to any extent a policy contained in a development plan for an area conflicts with another policy in the development plan the conflict must be resolved in favour of the policy which is contained in the last document to become part of the development plan"*.
- 8.204 On this basis, it is considered that limited weight should be applied to Policy DMD 43 of the Local Plan and precedence should be given to Policy D9 of the London Plan in assessing the appropriateness of tall buildings on the application site. This is considered in further detail below.
- 8.205 Given the out-of-date policies of the Council's Local Plan (in particular, Policy DMD 43 as referenced above) and the limited weight attributed to emerging Local Plan Policies in accordance with the NPPF paragraph 48, the Development Proposals should therefore be considered in the context of up-to-date policies including the London Plan (2021) as required by the NPPF (Paragraph 11d) and footnote 7).

8.206 This section of the report considers design and heritage matters arising from the proposed development. It is set out under the following sub-headings:

1. Demolition
2. Scale, Massing, Layout and Appearance
3. Design and Architectural Quality
4. Public Realm
5. Tall Buildings (Design and Townscape Impacts)
6. Impact on Heritage Assets
7. Assessment of Harm versus Benefits

8.207 The Council's Design and Heritage Team's comments and those of the GLA and Historic England have been incorporated into this section of the report.

Demolition

8.208 The site contains a two-storey LUL staff and Train Drivers' Accommodation building located along the western boundary within Site A adjacent to the railway track. The building is of limited architectural merit. The Heritage Statement accompanying the application identifies the building as detracting from the significance of the site and from the character and appearance of the conservation area. As such, no objection is raised to its removal.

Scale, Massing, Layout and Appearance

8.209 The site is in a sensitive location, partly within a Conservation Area, Area of Special Character, adjacent to the Green Belt, Sites of Importance for Nature Conservation and listed heritage assets. There are a significant number of mature trees and tree belts surrounding the site to the north and east and within Trent Park registered park and gardens which obscure the views of the site from the surrounding park. To the west and south, adjacent buildings Metro Point at four storeys and Blackhorse Tower at nine storeys, obscure views from the adjoining residential area. In 2017, the Council's planning committee resolved to grant approval for the redevelopment of Blackhorse Tower including increasing the height by an additional storey to 10 storeys (application reference 16/04133/FUL).

8.210 Policy D4 of the London Plan requires that all proposals exceeding 30 metres in height and 350 units per hectare must have undergone at least one design review or demonstrate that they have undergone a local borough process of design scrutiny. Applicants are also required to demonstrate the on-going sustainability in terms of servicing, maintenance and management of the development above this density.

8.211 The proposed development and earlier iterations of it have been reviewed by the Council's Design Review Panel on three separate occasions (most recently in September 2021) and their comments have been incorporated below where appropriate. The layout and massing of the proposal has evolved through an extensive and iterative pre-application process beginning in 2019 which has enabled a thorough assessment of the design at each stage of its development to achieve a

balance between the need for homes against the scheme impacts. The site capacity has been optimised, whilst taking a heritage and landscape-led approach, balancing against the other constraints of the site (such as tree protection areas, Thames Water easements and LUL requirements for maintaining the functioning of the Underground). The following critical moves have balanced this approach:

- A reduction in the number of units from 400 to 351 to reduce the bulk and massing of development.
- A reduction in the number of buildings from six to four improve the separation distance between them, and the listed station, resulting in an increase in the number of units in each building.
- The massing on Site B was reduced to align with the adjacent Blackhorse Tower and the context of Cockfosters Road and more height accommodated on Site A.
- Fewer buildings allow taller and more slender built forms at upper storeys so that development appears more elegant in the skyline. To deliver sufficient numbers of units, larger 'shoulder' buildings of up to six storeys which are obscured by mature tree belts accommodate more units at lower levels.
- The arrangement at ground level evolved to move massing away from the station building and provide a sensitive response which does not reduce internal daylight levels in the ticket hall and train shed.
- The arrangement avoids the appearance of bulk behind the station when viewed from Cockfosters Road and the layout and massing has been arranged so that sky appears between each building in most views, particularly those from Trent Park to avoid the forms coalescing in the skyline.
- This layout provides a landscape arrangement which minimises the amount of hardstanding and provides high levels of sunlight within communal amenity spaces.

8.212 The broad site layout is supported, as shown in **Figure 4** above, and the applicant's efforts to focus on a high-quality landscape led approach that knits the proposal into its surroundings is welcomed. Some concern has been raised regarding the challenges that a landscape-led approach poses including: clearly defining public and private spaces; successfully designing for different activities within the landscape / public realm including amenity space, parking and spaces for movement; ensuring that ground floors of buildings are adequately activated and ensuring that the publicly accessible spaces between buildings is well designed and safe, however these issues have either been addressed by the applicant through the scheme design, can be addressed by condition or can be outweighed by the wider benefits of the proposed landscape-led design approach.

8.213 Block 2 is located at the entrance of the site and acts as the gateway building and frames the public entrance space of the site. The main reception and residential amenity within the building activates the new public realm. The intended BtR operator will include a series of uses and amenities for residents as well as inclusion of co-working space. Both of these uses are welcome and offer an enhanced residential experience to that of a more traditional a single use building.

8.214 Block 3 includes the replacement LU staff offices and TDA and will be separated

from the residential element with its own entrance. The orientation of Block 3 allows direct access to the station for train drivers, which is supported.

- 8.215 Block 4 will front Cockfosters Road and the ground floor commercial unit and cycle hub proposed would complete the high street setting of the Local Centre creating activity and providing useful facilities for residents and the wider community. The improved public realm around Cockfosters Stations would create greater visibility and improve the pedestrian experience along the high street enlivening the new station entrance space and route to/from the Station.
- 8.216 The applicant's analysis of existing and potential routes through the site is also welcomed. The creation of new areas of public realm within both Site A and B is also welcomed as this prioritises the pedestrian experience of the site. The residential entrances and residential amenity at ground level that face onto the central open space is welcomed and offers activity and surveillance across the scheme. Details of the proposed landscape and public realm areas will be secured by condition to ensure that it is of a high quality, functions well and is safe.
- 8.217 The resulting layout and massing have been carefully composed in the context of heritage assets and minimise the appearance of built form in key views, particularly from Trent Park Registered Park and Garden and the designated Green Belt whilst balancing against residential amenity.
- 8.218 The heritage context has informed the amount and arrangement of development on the site in line with policy HC1 of the London plan and this is analysed in more detail below.

Design and Architectural Quality

- 8.219 The design of the proposal has sought to create buildings that sit comfortably in the context of the listed Station and celebrate its location at the gateway to London. The "*principles of connectivity, bringing the rural landscape into the site and improving the setting of the station*" and the 'landscape led' approach is supported, including by DRP, however as noted above it is also acknowledged that the landscape led approach (buildings placed within a publicly accessible landscape) also creates additional design challenges to be addressed which has been expressed as a concern by the Council's design officers.
- 8.220 Internally, the proposed buildings would have a logical layout, with open, prominent and accessible entrances. The development also provides publicly accessible landscaped amenity space, which would create activity around the station.
- 8.221 The design and materials have been considered within the site context and how the buildings will be seen and experienced in kinetic views. The principle of a simple, calm, gridded façade has been used for each building, with variety of detailing to create a family of buildings. The predominant material is brick. Variations of brick tone will be used to give subtle variety and interest across the buildings and to break down the massing. The architectural approach is generally well considered and the

use of a simple, high quality palette of materials comprising textured brickwork, concrete panels and metalwork is welcomed.

- 8.222 Site A takes cues from the nearby heritage features of Christ Church and 19th Century cottages along Cockfosters Road using light tones of brick and pre-cast concrete. On Site B, Block 4 uses darker reddish-brown brick to tie into the listed station and the surrounding urban context including the adjacent Cockfosters Parade. The ground floor plinth providing a commercial unit creates an active frontage that integrates into the townscape of Cockfosters Road, whilst reading at a human scale in relation to the single storey station building as required by Policy DMD 40 of the Local Plan.
- 8.223 The appearance and detailed façade treatment of the development is considered to be high quality, displaying an appropriate response to the surrounding character. The final appearance of the proposals will be subject to the quality of the materials and detailing. A condition would therefore be attached to any permission granted to secure key construction and facade details to achieve the highest design quality.

Public Realm

- 8.224 Creating an attractive public space on this site is important given the location adjacent to Trent Park and listed Station building. The proposal provides significant regenerative benefits by providing much improved public realm around the Station, along the part of the high street within the Site, and throughout the Proposed Development in accordance with the requirements of Policy D8 of the London Plan.
- 8.225 The existing poor quality, cluttered spaces including advertisement hoarding will be removed and replaced with a clear and accessible streetscape, including around the two secondary entrances to the Station, one of which provides new step-free access (to the north of the Station within Site A). The spaces have been designed based on an understanding of desire lines and how the spaces will function as set out in Policy D8 (Part D and E) of the London Plan.
- 8.226 The proposals will provide easy access between transport modes including the general-purpose car parking, blue badge spaces (Site A) and cycle hub (Site B) as well as short stay cycle parking in the public realm. Seating would be provided around the Site in sheltered locations and substantial green infrastructure including new tree planting is proposed to provide environmental and visual benefits. Pedestrians and cyclists will be prioritised with clear demarcation between vehicles and people. Within Site A, a new link to the LOOP would also be provided in the northern boundary. Lighting and CCTV will also be integrated into the detailed design to provide a sense of safety and security and would be secured by condition.
- 8.227 The BtR nature of the proposal means that management and maintenance of publicly accessible landscape spaces and this will be secured in perpetuity by s106. On-site concierge and management will contribute to feelings of safety and security, and relationships between the internal and external uses have been considered to provide natural surveillance.

- 8.228 The indicative landscape design is generally of high quality, introducing generous planting and trees. The open space, gardens, play areas and wild ponds and meadows are welcomed and contribute to a wild garden setting that is in keeping with the character of the park and draws nature into the development. The public realm improvements for Block 4 and Station Square are also welcomed. Some concern has been raised around the need to ensure clear definition of public and private spaces; boundary treatments; sight-lines through publicly accessible spaces and successful integration of the proposed parking, servicing and vehicular movements in to the overall coordinated landscape/public realm plan; however, it is considered that these issues can be addressed through detailed design and will be secured via condition.
- 8.229 Overall, the proposal would deliver a significant improvement and enhancement to public realm on the site and within the Cockfosters areas. Robust materials and mature planting are encouraged to ensure it integrates well with its surroundings and a final Landscape Plan would be secured by condition to ensure the highest quality in terms of materials, detailed design and functionality of the proposed external public spaces and landscape.

Tall Buildings (Design and Townscape Impacts)

- 8.230 Paragraph 3.9.1 of the London Plan states that tall buildings '*can form part of a planned approach to facilitating regeneration opportunities and managing future growth*' and identifies the opportunity for them to contribute towards making the optimum use of sites which are well-connected by public transport and have good access to services and amenities.
- 8.231 Policy D9 of the London Plan seeks to manage the development and design of tall buildings within London. It states that tall buildings should only be developed in locations identified as suitable in development plans, provided that their visual, functional, environmental and cumulative impacts are addressed.
- 8.232 Paragraph 6.4.1 of the Council's DMD within the Local Plan defines tall buildings as those that are substantially taller than their surroundings, cause a significant change to the skyline or are larger than the threshold sizes set for the referral of planning applications to the Mayor. The proposed buildings are a range of 10, 13 and 14 storeys at their tallest point (Block 1 would be approximately 43 metres in height; Block 2 would be approximately 44.8m in height; Block 3 would be approximately 47 metres in height; and Block 4 would be 36 metres in height above ground level) and exceed 30m, therefore being classified as 'tall buildings' in accordance with both the definitions set in the London Plan (Policy D4) and Council's Local Plan (Policy DMD 43).
- 8.233 The massing and height of the buildings has been designed to work with the existing landscape buffer to minimise the visibility from Trent Park and the setting of the registered park and garden. Each building also has a lower element of between 5 and 6 storeys to respond to this context and benefit from the mature landscape to screen the amount of built form visible in longer range views. The development of the site, which is currently tarmac, also provides an opportunity to improve the physical

surroundings of the listed Station, the appearance and setting of the Conservation Area and extend the greenery of the adjoining Trent Park into the site.

8.234 The building on Site B (Block 4) has also been reduced in scale to tie into the datum of the approved scheme to increase Blackhorse Tower by one storey and taller elements of the Proposed Development are focused on Site A.

8.235 Whilst planning policy takes a cautious approach to the introduction of new tall buildings, it also recognises the need to optimise the capacity, particularly of brownfield sites in sustainable locations. Policy D3 of the London Plan requires proposed developments to take a design-led approach to optimising capacity, having regard to local character and distinctiveness and Policy D9 recognises the role that taller buildings can play in achieving this.

8.236 The Council's Emerging Local Plan acknowledges the need to 'exhaust all reasonable opportunities on brownfield land, making underused land work harder and optimising densities' which remains a 'first principle' of the document (paragraph 2.4.1). The design of the buildings has been considered in line with the requirements and guidance of Policy D9 of the London Plan and supporting text, and the criteria set out in Policy DM 43 (Parts 3 and 4) of the Local Plan.

8.237 **Table 8** below provides an analysis of the proposed development against the requirements of Policy D9 of the London Plan.

Definition	
<p>A Based on local context, Development Plans should define what is considered a tall building for specific localities, the height of which will vary between and within different parts of London but should not be less than 6 storeys or 18 metres measured from ground to the floor level of the uppermost storey.</p>	<ul style="list-style-type: none"> The proposed development involves 'tall buildings' in accordance with Paragraph 6.4.1 of the Council's DMD and Paragraph 3.9.3 of the London Plan.
B Locations	
<p>1) Boroughs should determine if there are locations where tall buildings may be an appropriate form of development, subject to meeting the other requirements of the Plan. This process should include engagement with neighbouring boroughs that may be affected by tall building developments in identified locations.</p>	<ul style="list-style-type: none"> The Council does not have any up-to-date policies which formally identify suitable locations for tall buildings.
<p>2) Any such locations and appropriate tall building heights should be identified on maps in Development Plans.</p>	<ul style="list-style-type: none"> The Council does not have any up-to-date policies which formally identify suitable locations for tall buildings.

<p>3) Tall buildings should only be developed in locations that are identified as suitable in Development Plans.</p>	<ul style="list-style-type: none"> • Specific suitable locations have not been identified by the Council. • The location of the site falls within the definition of a 'sensitive location' in accordance with Policy DMD 43 of the Local Plan being partly located within a conservation area, adjacent to the Green Belt, sites of importance for nature conservation and listed heritage assets. The proposal therefore comprises tall buildings which DMD 43 acknowledges could be supported provided that certain criteria are met.
<p>C Development proposals should address the following impacts:</p>	
<p>1) Visual impacts¹</p>	
<p>a) the views of buildings from different distances:</p>	<ul style="list-style-type: none"> • The design determinants and analysis of height and mass are set out in section 3.1.6-3.1.8 of the Design and Access Statement (DAS) submitted and considered further below.
<p>i. long-range views – these require attention to be paid to the design of the top of the building. It should make a positive contribution to the existing and emerging skyline and not adversely affect local or strategic views.</p>	<ul style="list-style-type: none"> • The bulk of the building mass has been located below the tree line. • The taller elements which are visible above this have reduced mass, which helps create a more elegant skyline to avoid adverse impacts on local or strategic views. • Special attention has been paid to the tops of the buildings to create a recessive appearance against the sky. • The site layout has ensured that there is visible separation between buildings from the park and behind the listed station. This minimises the impact on designated heritage assets and the Green Belt.
<p>ii. mid-range views from the surrounding neighbourhood – particular attention should be paid to the form and proportions of the building. It should make a positive contribution to the local</p>	<ul style="list-style-type: none"> • The scale and mass of the buildings has been informed by a response to the dense tree belt which screens the site and mass at a lower level. • The materials for each building have been selected to relate to and

¹ Also required by Enfield Policy DMD 43 Part 4 (c)(e)(f)

<p>townscape in terms of legibility, proportions and materiality.</p>	<p>strengthen the surrounding neighbourhood and the specific contexts of Site A and Site B as set out in Chapter 4 of the DAS and considered further below.</p>
<p>iii. immediate views from the surrounding streets – attention should be paid to the base of the building. It should have a direct relationship with the street, maintaining the pedestrian scale, character and vitality of the street. Where the edges of the site are adjacent to buildings of significantly lower height or parks and other open spaces there should be an appropriate transition in scale between the tall building and its surrounding context to protect amenity or privacy.</p>	<ul style="list-style-type: none"> • Site A creates a pedestrian scale environment from immediate viewpoints along Cockfosters Road and within the site. Stepped massing and tree belts provide a transition from the open spaces of Trent Park to the proposed development. • Site B relates directly to the high street with commercial uses at ground floor and the height relates to adjacent Blackhorse Tower.
<p>b) whether part of a group or stand-alone, tall buildings should reinforce the spatial hierarchy of the local and wider context and aid legibility and wayfinding.</p>	<ul style="list-style-type: none"> • Building heights within the development have responded to the character and scale of the local area. • Block 2 provides an entrance marker to Site A and provides wayfinding for the station which is currently a low-rise building and not particularly legible along Cockfosters Road.
<p>c) architectural quality and materials should be of an exemplary standard to ensure that the appearance and architectural integrity of the building is maintained through its lifespan.</p>	<ul style="list-style-type: none"> • The materials proposed are of a high quality and have been selected following a detailed review of the local context.
<p>d) proposals should take account of, and avoid harm to, the significance of London’s heritage assets and their settings. Proposals resulting in harm will require clear and convincing justification, demonstrating that alternatives have been explored and that there are clear public benefits that outweigh that harm. The buildings should positively contribute to the character of the area.</p>	<ul style="list-style-type: none"> • The height and massing strategy has been informed by viability, the need for homes and heritage assets. • The setting of the station would be enhanced, with gateway buildings and improvements to the public realm. • Impact on the heritage assets is reduced as far as practicable. • 27 viewpoints have been provided within the TVIA, 8 of which have helped to iteratively test 11 design options.

	<ul style="list-style-type: none"> The proposed development would result in 'less than substantial' harm which is mitigated and outweighed by the significant public benefits proposed.
e) buildings in the setting of a World Heritage Site must preserve, and not harm, the Outstanding Universal Value of the World Heritage Site, and the ability to appreciate it.	<ul style="list-style-type: none"> Not applicable to this site.
f) buildings near the River Thames, particularly in the Thames Policy Area, should protect and enhance the open quality of the river and the riverside public realm, including views, and not contribute to a canyon effect along the river.	<ul style="list-style-type: none"> Not applicable to this Site.
g) buildings should not cause adverse reflected glare.	<ul style="list-style-type: none"> The proposed buildings would be constructed of matt materials and the glazing specified to reduce the risk of glare.
h) buildings should be designed to minimise light pollution from internal and external lighting.	<ul style="list-style-type: none"> The facades have been arranged to provide a suitable ratio of glazing to brick/concrete with consideration for daylight sunlight, overheating and minimisation of light pollution. The residential nature of the proposed development at upper floors means that curtains/blinds will usually be drawn during hours of darkness which minimises potential light pollution.
2) Functional impacts²	
a) the internal and external design, including construction detailing, the building's materials and its emergency exit routes must ensure the safety of all occupants.	<ul style="list-style-type: none"> The design has considered access arrangements to meet the needs of everyone and the Fire Strategy submitted sets out the approach to evacuation including provision of fire evacuation lifts.
b) buildings should be serviced, maintained and managed in a manner that will preserve their safety and quality, and not cause disturbance or inconvenience to surrounding public realm. Servicing, maintenance and building management arrangements	<ul style="list-style-type: none"> The Build to Rent nature of the proposed development means there will be 24/7 on-site management and the site will be maintained by the applicant in perpetuity.

² Also required by Enfield Policy DMD 43 Part 4(a)(b)(g)

<p>should be considered at the start of the design process.</p>	
<p>c) entrances, access routes, and ground floor uses should be designed and placed to allow for peak time use and to ensure there is no unacceptable overcrowding or isolation in the surrounding areas.</p>	<ul style="list-style-type: none"> • The architecture and landscape have been designed in tandem and define clear routes in and around the Site and to each building as described by Chapter 5 of the DAS. • Building entrances are recessed to provide generous internal and external lobbies. • Access to cycle stores is via the building lobby to avoid provision of secondary entrances.
<p>d) it must be demonstrated that the capacity of the area and its transport network is capable of accommodating the quantum of development in terms of access to facilities, services, walking and cycling networks, and public transport for people living or working in the building.</p>	<ul style="list-style-type: none"> • The Transport Assessment provides an assessment of public transport capacity confirming that additional trips as a result of the proposed development can be accommodated. • The proposed development will involve improvements to local walking and cycling networks directly associated with the site. • The proposed development includes a commercial unit and cycle hub for users of the site and the station. • Appropriate contributions have been agreed through a Section 106 towards increasing capacity of local facilities (e.g. health and education) as needed to support the proposed development.
<p>f) jobs, services, facilities and economic activity that will be provided by the development and the regeneration potential this might provide should inform the design, so it maximises the benefits these could bring to the area and maximises the role of the development as a catalyst for further change in the area.</p>	<ul style="list-style-type: none"> • The proposed development provides a commercial unit which will contribute towards the existing high street offer. It has been designed with consideration for commercial uses proposed along Cockfosters Road and for the redevelopment of Blackhorse Tower. • The provision of a cycle hub and residential and visitor cycle parking, and improved access to Trent Park via the LOOP support pedestrian and cycle movement. • The proposed development would provide a net increase in employment on the site.

<p>g) buildings, including their construction, should not interfere with aviation, navigation or telecommunication, and should avoid a significant detrimental effect on solar energy generation on adjoining buildings.</p>	<ul style="list-style-type: none"> The proposed development would not have any adverse impacts. Details of the construction would be provided in the detailed Construction Management Plan to be secured by condition.
<p>3) Environmental impacts³</p>	
<p>a) wind, daylight, sunlight penetration and temperature conditions around the building(s) and neighbourhood must be carefully considered and not compromise comfort and the enjoyment of open spaces, including water spaces, around the building.</p>	<ul style="list-style-type: none"> Assessments have been undertaken to confirm that there would be no unacceptable adverse impacts on the communal open space within the site and surrounding public open spaces or buildings (GIA Daylight and Sunlight report submitted). The Wind Microclimate report confirms that pedestrian level wind conditions in and around the site would remain safe and comfortable. There would be no adverse impacts on the comfort and enjoyment of open spaces as a result of the proposed development.
<p>b) air movement affected by the building(s) should support the effective dispersion of pollutants, but not adversely affect street-level conditions.</p>	<ul style="list-style-type: none"> The proposed buildings are appropriately spaced and would not cause any adverse impacts.
<p>c) noise created by air movements around the building(s), servicing machinery, or building uses, should not detract from the comfort and enjoyment of open spaces around the building.</p>	<ul style="list-style-type: none"> The proposed development would not detract from the comfort and enjoyment of open spaces as a result of any noise impacts.
<p>4) Cumulative impacts⁴</p>	
<p>a) the cumulative visual, functional and environmental impacts of proposed, consented and planned tall buildings in an area must be considered when assessing tall building proposals and when developing plans for an area. Mitigation measures should be identified and designed into the building as integral features from the outset to avoid retrofitting.</p>	<ul style="list-style-type: none"> The proposed development has been considered in the context of the adjacent Blackhorse Tower and potential additional storeys to this building as well as Metro Point opposite as set out in the TVIA submitted. The proposed development is considered to respond positively to its context and no mitigation measures are required beyond those already considered in the scheme design.

³ Also required by Enfield Policy DMD 43 Part 4(h)

⁴ Also required by Enfield Policy DMD 43 Part 4(d)

Public Access	
D Free to enter publicly-accessible areas should be incorporated into tall buildings where appropriate, particularly more prominent tall buildings where they should normally be located at the top of the building to afford wider views across London.	<ul style="list-style-type: none"> • The ground level amenity space would be publicly accessible. • The residential nature of the proposed development means that it is not appropriate to provide public access within the buildings. • A roof terrace within Block 2 is provided and accessible to all residents which affords views across London and Trent Park.

Table 8 – Assessment against Policy D9 of the London Plan

- 8.238 The location of the site falls under the definition of ‘*areas inappropriate for tall buildings*’ set out by Policy DMD 43 of the Local Plan. However, the Council’s Emerging Local Plan Regulation 18, whilst very limited in weight, shows the Council’s intended direction of travel identifying the site as an appropriate area for tall buildings (up to 45m), however this is not yet a formally adopted planning policy. Paragraph 3.9.2 of the London Plan also requires that locations should be identified for growth as part of Policy D1 of the London Plan which includes following a design-led approach to establish optimised site capacities.
- 8.239 Policy DMD 43 of the Local Plan sets out locations that may be appropriate for tall buildings as those with good access to public transport, contain existing tall buildings and within designated town centres or activity hubs. The site meets these criteria and given the location of the site next to the Station and as a previously developed site, there is a strategic justification for buildings of the proposed scale in this location, particularly in the context of the significant need for housing in the Borough.
- 8.240 The proposed development would be clearly visible in long range views, as illustrated in the submitted Townscape and Visual Impact Assessment (TVIA). Nonetheless, the majority of the bulk of the development has been located below the established tree line when viewed from the adjacent Trent Park and Green Belt. The development maintains a clear separation as an urban fringe development from the rural parkland character of Trent Park and would not substantially impact the landscape character of Trent Park, or have adverse impact on any strategic views. This visible separation between the buildings from the park also minimises the impact on designated heritage assets and the Green Belt.
- 8.241 In mid-range views from the surrounding neighbourhood, the tall buildings would have a clearly defined crown, middle and base. The carefully considered materials and colour palettes respond to the heritage characteristics of the conservation area and the proposed buildings have been composed to create a calm backdrop to the listed station; attempting not to compete with it for attention. The proposal would also aid in wayfinding and act as a landmark for Cockfosters Station. Design officers have expressed concern that the proposed buildings could be more varied in architectural form and arrangement, however the overall officer assessment is that the applicant’s proposed approach of creating a more subtle variety between blocks and a calmer backdrop to heritage assets that mitigates and minimises heritage impacts is an

appropriate and justified approach in accordance with Policy HC1 of the London Plan.

- 8.242 In short-range views, the materiality and proportion of the ground floor residential and commercial space responds to a human scale. The proposed public amenity space will create activity around the site.
- 8.243 In accordance with Policy D9 of the London Plan and the criteria set out in Policy DMD 43 of the Local Plan, a thorough assessment of the visual, functional, environmental and cumulative impacts of the proposal as the design has developed has informed the layout and massing to minimise adverse effects and prevent any compromise to the comfort and enjoyment of the spaces around the buildings. Visual assessments have informed the layout, massing and design to minimise adverse impacts on long-range, mid-range and immediate views.
- 8.244 The proposed building footprints are influenced by the irregular shapes of the development sites, and the opportunity to step the massing using set-backs and 'shoulder' blocks that frame taller elements, purposefully responding to the geometry of the surrounding landscape and townscape whilst negotiating on-site constraints. The form and proportions of the building have considered the appearance on the skyline, including the integration of plant equipment on the roof, concealed behind a finessed parapet. The need to maximise the amount of sky visible between the buildings and from the street has informed the positioning of buildings, and the base of the building is activated by its use and frontages which interact with the landscape, defining routes through and around the buildings. As set out in **Table 8** above, the proposed development fully complies with the criteria relating to impacts and public access set out in Policy D9 of the London Plan.
- 8.245 The proposal has taken account of the significance of its setting and seeks to provide buildings that balance the local character and history of the site and its surroundings against the need for innovation and change to optimise the site's potential. On the edge of an urban area, the design of the buildings and the landscape support an appropriate amount of development and optimisation of the site through sensitive design and detailing and effective landscaping. The materials and design proposed are of a high quality and have been devised with a clear rationale relating to the immediate context as well as considering the appearance of the proposal from longer distance views. Whilst the location of the site falls under the definition of 'areas inappropriate for tall buildings' set out by Policy DMD 43, in all other respects the proposed development would comply with local and national policies in relation to design and would be in accordance with the NPPF (paragraph 122), Core Policies 9 and 25, Policies DMD 37 and DMD 38 of the Local Plan and Policies D1, D2, D3, D4, D9, HC1 and GG2 of the London Plan.

Impact on Heritage assets

- 8.246 The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the tests for dealing with heritage assets in planning decisions. In relation to listed buildings, all planning decisions should "*have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which*

it possesses". In relation to conservation areas, special attention must be paid to "the desirability of preserving or enhancing the character or appearance of that area".

- 8.247 The NPPF states that when considering the impact of the proposal on the significance of a designated heritage asset, great weight should be given to the asset's conservation and the more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. Significance is the value of the heritage asset because of its heritage interest, which may be archaeological, architectural, artistic or historic, and may derive from a heritage asset's physical presence or its setting.
- 8.248 Where a proposed development will lead to 'substantial harm' to or total loss of the significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss. Where a development will lead to 'less than substantial harm', the harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.
- 8.249 Policy HC1 of the London Plan requires development proposals which affect the setting of heritage assets (designated and non-designated) to be sympathetic to their significance and appreciate their surroundings. Harm should be avoided, and enhancement opportunities taken where they arise. Core Policy 31 of the Local Plan requires that special regard be had to the impacts of development on heritage assets and their settings, Policy DMD 44 advises applications for development which fail to conserve and enhance the special interest, significance or setting of a heritage asset will be refused whilst Policy DMD 37 requires that development must be suitable for its intended function and improve an area through responding to the local character, clearly distinguishing public and private spaces, and a variety of choice. Making Enfield: Enfield Heritage Strategy 2019-2024 SPD (2019) is also relevant.
- 8.250 Turning to consider the application of the legislative and policy requirements referred to above, the first step is for the decision-maker to consider each of the designated heritage assets (referred to hereafter simply as "heritage assets") which would be affected by the proposed development (the applicant should describe the significance of the heritage assets affected) in turn and assess whether the proposed development would result in any harm to the heritage asset.
- 8.251 The decision of the Court of Appeal in *Barnwell Manor* confirms that the assessment of the degree of harm to the heritage asset is a matter for the planning judgement of the decision-maker. However, where the decision-maker concludes that there would be some harm to the heritage asset, in deciding whether that harm would be outweighed by the advantages of the proposed development (in the course of undertaking the analysis required by s.70 (2) of the Town and Country Planning Act 1990 and s.38 (6) of the Planning and Compulsory Purchase Act 2004, the decision-maker is not free to give the harm such weight as the decision-maker thinks appropriate. Rather, *Barnwell Manor* establishes that a finding of harm to a heritage asset is a consideration to which the decision-maker must give considerable importance and weight in carrying out the balancing exercise.

- 8.252 There is therefore a “strong presumption” against granting planning permission for development which would harm a heritage asset. In the Forge Field case the High Court explained that the presumption is a statutory one. It is not irrefutable. It can be outweighed by material considerations powerful enough to do so. But a local planning authority can only properly strike the balance between harm to a heritage asset on the one hand and planning benefits on the other if it is conscious of the statutory presumption in favour of preservation and if it demonstrably applies that presumption to the proposal it is considering.
- 8.253 The case-law also establishes that even where the harm identified is ‘less than substantial’ (i.e. falls within paragraph 199 of the NPPF), that harm must still be given considerable importance and weight.
- 8.254 Where more than one heritage asset would be harmed by the proposed development, the decision-maker also needs to ensure that when the balancing exercise is undertaken, the cumulative effect of those several harms to individual assets is properly considered. Considerable importance and weight must be attached to each of the harms identified and to their cumulative effect.
- 8.255 What follows is an officer assessment of the extent of harm which would result from the proposed development. This includes Conservation Areas and neighbouring Listed Buildings. Both an individual assessment against each heritage asset as well as a cumulative assessment is provided. This is then followed by an assessment of the heritage benefits of the proposal.
- 8.256 Sections 16 and 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 impose a statutory duty on planning authorities to safeguard the special interest of listed buildings and their settings. Section 72 of the Act imposes a statutory duty on planning authorities to preserve or enhance the character and appearance of conservation areas.
- 8.257 Where harm is caused to a heritage asset, the NPPF requires decision makers to determine whether the harm is substantial, or less than substantial. If the harm is deemed to be less than substantial, paragraph 202 of the NPPF requires the harm to be weighed against the public benefits of the proposal, including securing the optimum viable use of the heritage asset.
- 8.258 If the harm is substantial, or results in a total loss of significance, paragraph 201 states that local authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh the harm or loss, or all four of the following criteria apply: the nature of the heritage asset prevents all reasonable uses of the site; and no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and conservation by grant-funding or some form of not for profit charitable or public ownership is demonstrably not possible; and the harm or loss is outweighed by the benefit of bringing the site back into use.
- 8.259 Paragraph 199 of the NPPF advises that “*when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should*

be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance".

Paragraph 200 further advises that "any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification".

8.260 A Heritage Assessment has been undertaken by the applicant providing an assessment of the heritage impacts and heritage benefits of the proposal for each of the three identified designated heritage assets, namely: (i) Grade II Listed Cockfosters Underground Station; (ii) Trent Park Conservation Area; and (iii) Trent Park registered Park and Garden. This assessment has been undertaken according to the up-to-date requirements of the London Plan and the NPPF, and against the Planning and Listed Buildings Act (1990) and provides a balancing exercise of the anticipated level of harm to the relevant heritage assets against the heritage and public benefits. The Council has also undertaken its own assessment, including both the above designated heritage assets and the two non-designated heritage assets (Christ Church and 1-12 Cockfosters Parade) within the vicinity of the site.

8.261 Of the 27 views that have been assessed in the TVIA submitted, 6 (A, G, H, I, S1 and S2) are close views from the immediate context, 4 (B, D, L and T3) are mid-range views from the surrounding neighbourhood and 17 (C, E, F, J, K, M, N, O, P1, P2, P3, P4, Q, R, T1, T2 and U) are long-range views, as directed by Policy D9 of the London Plan.

8.262 The impact on Heritage Assets, including listed buildings in proximity of the site, conservation areas and locally listed buildings/structures is considered in detail below.

Setting of Designated Heritage Assets

Grade II Listed Cockfosters Underground Station

8.263 The heritage significance of the station is derived from its architectural value related to the design of the train shed, ticket hall and entrance. Officers consider that the application site being used as car parks does not contribute positively to the setting and significance of the listed station. The proposed buildings have been sited to maintain a distance from the station to ensure there is a clear and appreciable visible separation between the station building and the proposed buildings. Another key consideration for the placement of buildings has been to maintain natural light entering the sub-surface train shed and ticket hall and avoid overshadowing, as this contributes to the architectural interest of the station. The proposed layout would also provide an enhanced public realm around the station entrances, which would improve this aspect of the station's setting, which represents a heritage benefit to the station.

8.264 Nevertheless, the proposed height of Block 1, 2 and 3 would create a new backdrop to the station and would change the views of the station. By virtue of its height and massing the proposed development would dwarf the Grade II Listed Building and

significantly urbanise its setting. This impact would be experienced from Cockfosters Road and the train platform. There would also be a slight overshadowing impact of the concrete framed trainshed. This would result in a moderate degree of 'less than substantial harm' to the Station.

- 8.265 With regards to 'clear and convincing justification', the applicant has sought to mitigate the impact of the development through the design of the landscaping together with the alignment of the towers. Despite this, however, it is not considered possible to eliminate all harm without significantly reducing the quantum of development (and therefore also the associated public benefit).
- 8.266 Within the red-line boundary, the landscape improvements at the entrance to the north together with the provision of a public square to the south will have a positive impact upon the immediate setting of this Listed Building.

Grade II Listed Registered Trent Park

- 8.267 The significance of the Grade II registered Trent Park is derived from its historic landscape, including various historic features such as the Grade II listed Trent House, Lime Avenue and its rural character.
- 8.268 The visibility of the scheme from within the Registered Park and Garden (RPG) has been the subject of much discussion with the applicant. Based upon the evidence provided, it appears that there will be limited visibility of the development from key viewpoints within the RPG such as the main driveway. Where the towers are visible, however, the development will appear an urban influence within an otherwise tranquil and inward-looking landscape. This harm would be cumulative to that caused by the Black Horse Tower. This would result in harm at the lower end of 'less than substantial'.

Trent Park Conservation Area

- 8.269 The Trent Park Conservation Area is focused on Trent Park House (the mansion) and its estate. This includes the parkland landscape, gardens surrounding the mansion and ancillary buildings and farmland associated with the estate. Site A is located at the urban fringe of the conservation area and makes neutral contribution to its character.
- 8.270 By virtue of its height and massing the proposed development would have an urbanising impact upon the character and appearance of the Conservation Area as experienced from: the public rights of way to the east of the application sites; Cockfosters Road; the London Outer Orbital Path; Trent park Cemetery; Chalk Lane; and Trent Park (see discussion of RPG below). In particular, the proposal would be extremely prominent from within the cemetery to the north as a formally designed landscape of introspection. Furthermore, the proposed development would be of increased visual prominence in night-time views. Whilst the scale of change is significant, the overall degree of 'less than substantial' harm identified is considered moderate given the limited visibility from within the RPG – the area of highest significance.

8.271 With regards to ‘clear and convincing justification’, the applicant has made efforts to reduce the harm by lowering the overall height and thereby limit the visibility from within the Trent Park RPG.

Setting of Non-Designated Heritage Assets

Christ Church, Chalk Lane (Locally Listed)

8.272 Christ Church is locally listed and was built in 1837-39 when Cockfosters became a separate parish and was paid for by Robert Bevan of nearby Trent Park. The Bevan Family monument is found in the small churchyard to the north of the church, which has gravestones and some fine monuments among grass, with yew and other trees, roses and shrubs.

8.273 The proposed scheme would have an urbanising impact upon the setting of the church as experienced in views down Chalk Lane. This would be a low degree of harm, cumulative to that caused by the intervening office block.

8.274 At present there is an application for Christ Church to be designated a Listed Building. A decision is expected by the Department for Communities and Local Government prior to Planning Committee. Were the Church to be designated the scheme should be determined in accordance with the sequential test. The level of harm caused in this instance would be at the lower end of ‘less than substantial’.

1-12 Cockfosters Parade

8.275 1-12 Cockfosters Parade is an inter war parade of shops with residential above, which is two-storeys in height with accommodation also in the roof space.

8.276 By virtue of its height and massing the proposed development would not respond positively to the scale of the townscape and would thereby dwarf the parade. This would be a low degree of harm.

Adverse Heritage Impacts

8.277 In summary, the Council’s views and townscape analysis above contains the detailed narrative on heritage impacts. The adverse impacts are summarised in **Table 9** below:

Designated Heritage Assets			
Asset Name	Status	Impact on Setting	Resulting Harm
Cockfosters Station	Listed Grade II	Negative	Less than substantial harm – moderate

Trent Park	Listed Grade II Registered Park and Gardens	Negative	Less than substantial harm – lower end
Trent Park CA	Conservation Area	Negative	Less than substantial harm – moderate
Designated Heritage Assets			
Christ Church	Local Heritage List	Negative	Low degree of harm to setting
1-12 Cockfosters Parade	Local Heritage List	Negative	Low degree of harm to setting

Table 9 – Adverse Heritage impacts identified

8.278 Whilst all instances of harm to designated heritage assets may be ‘less than substantial’, great weight must be given to the conservation of heritage assets (Paragraph 199 of the NPPF) and clear and convincing justification provided for any level of harm (Paragraph 200).

8.279 The duty to pay "special regard" or "special attention", in sections 16(2), 66(1) and 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 means that there is a "strong presumption" against the grant of planning permission where it would cause harm to a heritage asset. It is also important to note that the identification of ‘less than substantial harm’ does not equate to a ‘less than substantial’ objection. The decision-maker must apply a weighted or tilted balancing exercise, giving the assessed degree of harm to the heritage asset "*considerable importance and weight*" and offsetting harm against other considerations.

8.280 With regard heritage impact the NPPF states:

‘197. In determining applications, local planning authorities should take account of:

- a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;*
- b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and*
- c) The desirability of new development making a positive contribution to local character and distinctiveness.*

199. When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

200. Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification.

202. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

203. The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset'.

8.281 Paragraph 193 of the NPPF places great weight on the preservation of designated heritage assets and their settings. This applies to the numerous statutory listed buildings and conservation areas in this case. The starting point is 'no harm'.

Heritage Benefits Beyond the Application Site Red-Line boundary

8.282 The applicant has agreed to undertake, or fund, works beyond the red-line boundary which would reduce the harm caused and/or result in heritage benefits. These would be delivered through a Section 106 Agreement and would include the following:

1) Cockfosters Road

- (i) Improvements associated with the development of the site, within the red line boundary implemented, through Section 278; and
- (ii) Alterations to site accesses / works to site frontage and public footpaths along the highway, including works associated with provision of the new civic square and cycle hub, within the red line boundary.

8.283 Works beyond the red-line boundary have been agreed in principle and are to be secured within a Section 106 Agreement. These works should be implemented prior to occupation of the development and would include:

- The paving of the pavement between the two sites in a suitably high-quality material;
- The paving of the pavement outside the western entrance to Cockfosters Station between Chalk Lane and Cockfosters Parade; and
- Replacement street furniture (railings, bins, lampposts);

8.284 The works would enhance the immediate setting of Cockfosters Station and thereby deliver a heritage benefit.

2) Future Links to London Loop

- (i) To provide connections from the site to the London Loop with a scheme being prepared prior to first occupation to demonstrate how the connection would be delivered. This must be developed in consultation with LB Enfield Parks.

8.285 Works beyond the red-line boundary will likely be agreed in detail post determination and secured within a Section 106 Agreement. These works should be agreed and implemented prior to occupation of the development. The applicant has prepared a preliminary vision document showing enhancements to the LOOP which include details of:

- Ground surface;
- Boundary;
- Retained trees;
- New trees and shrubs;
- Wayfinding signage; and
- Any other public art or interventions which show it to be a high-quality intervention.

8.286 The above commitment has the potential to enhance this part of the Trent Park Conservation Area as well as provide essential mitigation.

3) Heritage and Trent Park Enhancements

- (i) To prepare a Landscape Management Plan for Trent Park, in consultation with LB Enfield Parks and Berkeley. The plan should cover:

- a. Legacy planting to the Cemetery;
- b. Enhancement of London Outer Orbital Path (LOOP);
- c. Public art which responds to the historic landscape;
- d. Extend landscaping to include the LOOP for more effective integration;
- e. Arboricultural Management Plan for Trent Park;
- f. Legacy planting and tree management (informed by Arboricultural Management Plan); and
- g. Interpretation signage within Trent Park.

- (ii) Heritage interpretation scheme beside Cockfosters Station.

8.287 Works beyond the red-line boundary will likely be agreed in detail post determination and secured within a Section 106 Agreement. These works should be agreed and implemented (where appropriate) prior to occupation of the development.

8.288 The below commitments have the potential to provide mitigation and enhancement to different heritage assets:

- a. Legacy planting to the Cemetery – This planting is considered essential mitigation for the Trent Park Conservation Area (rather than enhancement works);

- b. Enhancement of London Outer Orbital Path (LOOP) – This will provide mitigation as well as having the potential to enhance the Trent Park Conservation Area. The applicant is currently preparing a vision document for this area.
- c. Public art which responds to the historic landscape – the exact value of contribution and final output has not yet been agreed. As such, it is not possible to determine whether this will result in a heritage benefit.
- d. Extend landscaping to include the LOOP for more effective integration – This will provide mitigation as well as having the potential to enhance the Trent Park Conservation Area. The applicant is currently preparing a vision document for this area.
- e. Arboricultural Management Plan for Trent Park – This will provide continued mitigation for the benefit of the Trent Park Conservation Area and Registered Park and Garden. The exact value of contribution and final output has not yet been agreed. As such, it is not possible to determine whether this will result in a heritage benefit.
- f. Legacy planting and tree management (informed by Arboricultural Management Plan) – This will provide continued mitigation for the benefit of the Trent Park Conservation Area and Registered Park and Garden. Whilst a financial figure has been proposed, it is difficult to establish the resultant effect this will have.
- g. Interpretation signage within Trent Park – This will result in a heritage benefit to the Trent Park Conservation Area and Registered Park and Garden.
- h. Heritage Interpretation besides Cockfosters Station will result in an enhancement to the Grade II Listed Building.

Assessment of Harm versus Benefits

- 8.289 Paragraph 202 of the NPPF notes that, where the overall net balance of heritage considerations is that any harm is less-than-substantial, *“this harm should be weighed against the public benefits of the proposal, including, where appropriate, securing its optimum viable use.”*
- 8.290 An assessment of the current application has identified ‘less than substantial’ harm would be caused by the proposed buildings which would be harmful to the setting of the Trent Park Conservation Area as experienced from: the public rights of way to the east of the application sites; Cockfosters Road; the London Outer Orbital Path; Trent park Cemetery; Chalk Lane; and Trent Park. It would also be harmful to the setting of the statutorily listed Cockfosters Station, Grade II registered landscape of Trent Park and locally listed buildings in Chalk Lane (Christ Church) and Cockfosters Road (1-12 Cockfosters Parade) as set out in **Table 7** above.
- 8.291 Notwithstanding that the proposal represents a departure from accordance with Policies DMD43 and DMD44 of the Local Plan and Policy G4 of the London Plan, the application scheme is considered not to conflict with policy in all other regards and as such, as a policy compliant scheme it would deliver social, economic, environmental and sustainable benefits to the community.
- 8.292 However, as the proposal represents a departure from Policies DMD 43 and DMD 44 of the adopted local plan and has been identified as causing ‘less than substantial’

harm, it is important to identify the public benefits that would outweigh these in line with paragraph 202 of the NPPF. These benefits are considered to be:

- Heritage - enhancements to Trent Park, Cockfosters Road and Cockfosters Station;
- New Homes - delivery of 351 new housing, including 132 affordable housing units (40% by habitable room or 38% based on units);
- Increasing and improving open space provision – the existing 815sqm of currently inaccessible designated Local Open Space would be replaced with a new publicly accessible amenity spaces within the site amounting to 4,200sqm and forming part of a comprehensive landscape scheme with significant tree planting that would provide accessible public realm that can be used by the local community.
- Improving and Enhancing Public Realm - enhancements to public realm and way finding, including through provision of 4,200sqm of high quality, permeable public realm.

8.293 The proposal successfully balances the need for new homes on an underutilised, well-connected brownfield site against the site's setting and character. It reconciles an appropriate quantum of new homes to make a substantial contribution to housing need, against the sensitivities of the heritage assets, adjoining Green Belt and nature conservation sites in order to optimise the potential of the site in accordance with local and national policy when read as a whole.

8.294 The proposal is considered to be in accordance with policy HC1 of the London Plan and would successfully deliver positive benefits that conserve and enhance the historic environment, as well as contributing to the economic viability, accessibility and environmental quality of a place, and to social wellbeing. The identified social, economic, environmental and sustainability value that the scheme would bring, with the addition of the benefits identified above, it is considered that the public benefits of the application scheme outweigh the departure from policy and 'less than substantial' harm identified. As such, the proposal is considered to be acceptable and in accordance with Sections 16, 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990, the NPPF and development plan policies.

Green Belt and Open Space

Green Belt

8.295 Site A is located directly adjacent to the Green Belt boundary, the designation of which encompasses Trent Park to the north and east. As a result, the site defines the northern boundary of the urban area of London and the transition to Green Belt land. Chapter 13 of the NPPF sets out the overarching policies for the protection of Green Belt land.

8.296 Policy DMD 83 of the Local Plan states that development next to the Green Belt will only be permitted if (a) there is no increase in the visual dominance and intrusiveness of the built form by way of height, scale and massing, on the Green Belt; (b) there is

a clear distinction between the Green Belt and urban area; (c) views and vistas from the Green Belt into urban areas and vice versa, especially at important access points, are maintained. Policy DMD 83 also requires proposals to maximise opportunities to incorporate measures to improve the character of land adjacent to the Green Belt through environmental improvements and to increase opportunities for public access.

- 8.297 Core Strategy Policy 33 seeks to continue to protect and enhance Enfield's Green Belt. The London Plan strongly supports the continued protection of the Green Belt set out by the policies within the NPPF, and its purpose to assist in urban regeneration by encouraging the recycling of derelict and other urban land as set out by Paragraph 134, part (e) of the NPPF.
- 8.298 The Proposed Development accords with the requirements of the NPPF which restricts development of land within the designated Green Belt, but not adjacent to it. The fundamental aim of Green Belt Policy as set out at NPPF paragraph 133 is to prevent urban sprawl by keeping land permanently open. The Proposed Development would be visible from some parts of the adjacent Trent Park, which also fall within designated Green Belt land.
- 8.299 Policy DMD 83 of the Local Plan advises that proposed development located next to, or within close proximity to, the Green Belt will only be permitted where it results in *"no increase in the visual dominance and intrusiveness of the built form by way of height, scale and massing on the Green Belt"*. It is unclear from its wording as to whether this policy precludes sites with minimal development on them from coming forward with an increase in built form. The TVIA accompanying the application illustrates that the Proposed Development would appear in some views, although changes are nuanced and vary dependent upon the viewpoint. However, the impacts of this have been mitigated so that the intrusion of the appearance of built form is minimal. The varied height and massing and high design quality reduces the visual impact.
- 8.300 In many views identified by the TVIA, visibility of the buildings is largely obscured by the nature of the undulating landscape and vegetated buffers to the site. Where buildings are visible, these are glimpsed, or are seen within the context of the existing built forms already visible from the Green Belt (namely Blackhorse Tower). The use of massing studies to inform the design has been important for establishing the parts of the site where height is more or less visible from a range of views and has informed the positioning, scale and mass of buildings.
- 8.301 The Proposed Development involves improvements to the existing access to the LOOP which provides pedestrian and cycle access directly into the Green Belt from this site, providing opportunities to enhance the beneficial use of the Green Belt as required by NPPF paragraph 145. Further improved connections could also be facilitated by the Proposed Development, which are supported and encouraged by Policy GI2 of the London Plan and supported by Policy DMD 83 of the Local Plan. Furthermore, the improvements to the nature of the site by way of introduction of significant landscaping, green roofs and planting represents measures to improve the

character of the land as it sits adjacent to the Green Belt, as encouraged by Policy DMD 83, whilst providing a clear distinction between the Green Belt and urban area.

- 8.302 Whilst it is acknowledged that the scheme will be visible from within the Green Belt, there is no encroachment into the Green Belt and the development does not present any substantial harm to the openness of the Green Belt by virtue of new development in the Green Belt. The visual impact of the development has been minimised as far as practical through the sensitive use of facade material and building form and the buildings would form a strong urban edge to the wider body of Green Belt. The applicant has provided a series of views from within the Green Belt which demonstrate that whilst the buildings would be a visible addition to the setting of the Green Belt, this impact has been minimised as far as possible within the operational requirements of the site.
- 8.303 In relation to Policy DMD 83 of the Local Plan, the appearance of the Proposed Development would not be so visually dominant or intrusive, particularly in important views, that the presence would not be outweighed by the public benefits. These have been set out in the heritage assessment above. The extension of the green edge to the urban area, which is currently defined by unsightly hard standing and car parking, as well as the opportunities provided to much improve access into the Green Belt via the LOOP comply with the aspirations of the Local Plan, London Plan and NPPF to increase opportunities for public access.
- 8.304 As such the proposals would not detract from the visual amenity of the Green Belt and the overall height and massing of the scheme is supported in strategic design terms.

Open Space

- 8.179 Policy G4 of the London Plan states that development proposals should not result in the loss of designated open space. Site A includes an area of woodland that extends south into the site from the northern boundary. This woodland is not currently accessible by the public. The proposal would result in the removal of this particular area, however, the proposal would result in a gain of open space with the reconfiguration of the existing area of local open space (currently circa 800sq.m.) and the reprovision of 3,000sqm of publicly accessible local open space, which is welcomed. The planting of 93 new trees is also proposed on the site, resulting in a net gain of 75 trees, which is also welcomed. Improved access to the LOOP path and new accesses to surrounding open space (through a woodland trail) are also supported.

Neighbouring Amenity Considerations

- 8.180 Policy D6 of the London Plan sets out that buildings should not cause unacceptable to residential amenity, including in terms of privacy and overshadowing. Development proposals should provide sufficient daylight and sunlight to new and surrounding

housing that is appropriate for its context, whilst avoiding overheating, minimising overshadowing and maximising the usability of outside amenity space.

8.181 Meanwhile Policy CP30 of the Local Plan seeks to ensure that new developments have appropriate regard to their surroundings, and that they improve the environment in terms of visual and residential amenity. Lastly Policies DMD 6 and 8 of the Local Plan seek to ensure that residential developments do not prejudice the amenities enjoyed by the occupiers of neighbouring residential properties in terms of privacy, overlooking and general sense of encroachment.

Daylight and Sunlight

8.182 In general, for assessing the sunlight and daylight impact of new development on existing buildings, Building Research Establishment (BRE) criteria is adopted. In accordance with both local and national policies, consideration has to be given to the context of the site, the more efficient and effective use of valuable urban land and the degree of material impact on neighbours.

8.183 BRE Guidelines paragraph 1.1 states: *“People expect good natural lighting in their homes and in a wide range of non-habitable buildings. Daylight makes an interior look more attractive and interesting as well as providing light to work or read by”*. However, Paragraph 1.6 states: *“The advice given here is not mandatory and the guide should not be seen as an instrument of planning policy; its aim is to help rather than constrain the designer. Although it gives numerical guidelines, these should be interpreted flexibly since natural lighting is only one of many factors in site layout design...”*.

8.184 Whilst the BRE guidelines are not mandatory; they do however act as a guide to help understand the impact of a development upon properties and other spaces, while acknowledging that in some circumstances, such as that of an urban environment or where the existing site is only previously partially developed some impact may be unavoidable. It should be further noted that the BRE guide considers level of daylight, sunlight and overshadowing tests based on an expectation of reasonable levels of light within a suburban context and this should be kept in mind when considering a central London context as is the case for the application site.

8.185 The Council has sought an independent review of the submitted GIA Daylight and Sunlight Assessment report that accompanies the application. This review was undertaken by Hollis. Their assessment review considers a number of tests:

- Vertical Sky Component (VSC): A measure of the amount of skylight available at the centre of a habitable room window (ratio compared to horizontal plane) to serve a habitable room. The BRE guide states that daylighting may be affected if the VSC calculation is less than 27% and less than 0.8 times its former value;
- Daylight Distribution / No skyline test (NSL): A measure that calculates the amount of area (at the working plane) of a habitable room which receives direct skylight and how much does not. The BRE guide highlights if less than 0.8 times former value, reductions will be noticeable;

- Annual Probable Sunlight Hours (APSH): Is a measure of the average number of hours per year in which direct sunlight is received by a window. The BRE guide states that rooms may be affected if they receive less than 25% APSH for the year and 5% APSH for the winter; and less than 0.8 times former value;
- Shadowing: The BRE guide recommends that at least half the area of an amenity space should receive at least 2hrs of sunlight on the equinox (21 March); and
- Average Daylight Factor (ADF): Is a measure of the daylight received inside a habitable room. The BRE guide recommends that the minimum ADF values should be achieved for bedrooms (1%), living rooms (1.5%) and kitchens (2%).

8.186 The application site is within an urban site and currently there is fairly limited massing on the site with some neighbouring properties having higher levels of daylight and / or sunlight than ordinarily anticipated for more typical urban environments. It is inevitable that for such a site, there will be departures to the BRE Guide default 'target criteria' and due suitable flexibility and interpretation of the analysis results will be required. This is reinforced within The Mayor of London's 'Housing Supplementary Planning Guidance' (paragraphs 1.3.45 and 1.3.46).

8.187 The GIA report explains the method of assessment for daylight and sunlight and includes detailed VSC, NSL and APSH results in a table for each of the applicable neighbouring properties as follows:

- 120 Cockfosters Road
- 1 and 1a Cockfosters Parade
- 2-2a, 3a, 4-4a Cockfosters Parade
- 5a Cockfosters Parade
- 6-7 Cockfosters Parade
- 8 Cockfosters Parade
- 9 and 9a Cockfosters Parade
- 10 and 10a Cockfosters Parade
- 11 and 11a Cockfosters Parade
- 12 Cockfosters Parade
- Churchwood & Holbrook House (Block A)
- Churchwood & Holbrook House (Block B)
- Churchwood & Holbrook House (Accessible Block)
- The Cottage, Belmont Close

8.188 Hollis have reviewed the assessment undertaken and agree that these 14 neighbouring properties are the only properties in sufficiently close proximity to warrant consideration of daylight and sunlight amenity impacts.

8.189 Of the 14 neighbouring properties, the following 4 properties have been classified as adhering to the numerical values set out within the BRE Guidelines and have not been further discussed within this report:

- 1 and 1a Cockfosters Parade
- Churchwood & Holbrook House (Block B)
- The Cottage, Belmont Close

- 120 Cockfosters Road

- 8.190 In relation to the remaining 10 neighbouring properties, where there are failures of compliance with the BRE numeric targets for VSC assessment, these have all been appraised against the "mid-teen" approach which has been taken in a number of planning appeal cases, such as in the Whitechapel (Appeal reference APP/E5900/W/17/3171437) and Graphite Square appeals (Appeal references APP/N5660/W/18/3211223 and APP/N5660/W/19/3225761).
- 8.191 GIA have given an explanation for their alternative use of VSC "mid-teen" target values (i.e. VSC 15%-17%) although the Strict national target value 'ideal' for VSC to a window is 27% (BRE Guidelines), in urban locations and especially in London, typical VSC values can often be in the region of 13% where there is an existing obstruction angle of more than 50 degrees (or equivalent when also considering oblique obstructions). There are many examples of typical and successful London Streets and typologies where a portion of the windows achieve VSC values in low single values.
- 8.192 The GIA report suggests that a retained VSC value in the region of 13% is more realistic and appropriate. Whilst mid-teen VSCs have been accepted, the reduced target is not an approach set out in the BRE Guidelines and given the very recent (23 June 2021) Secretary of State decision on 8 Albert Embankment (Appeal references APP/N5660/V/20/3254203 & APP/N5660/V/20/3257106) which clearly takes issue with using reduced VSC targets in daylight assessments, the acceptability of applying such a reduced target is questioned. Notwithstanding this, the Secretary of State's decision does not set any formal precedent and is only one of a range of decisions some of which have and some which have not adopted the mid-teen VSCs approach taken in the GIA report and informally adopted by many within the sunlight and daylight industry.

- 8.193 The impact on the 10 neighbouring properties identified is set out below.

2-2a, 3a, 4-4a Cockfosters Parade

- 8.194 2-2a, 3a, 4-4a Cockfosters Parade are located west of the development site and the first and second floors are in residential use. There are 12 windows serving six rooms that have been considered relevant for assessment within the property.
- 8.195 In relation to daylight (VSC and NSL), four of the six (66.7%) rooms will achieve compliance. Of the 12 windows assessed, six (50%) will adhere to the BRE Guidelines for VSC. Of the six windows that do not meet the BRE criteria, two will experience an alteration of c.29% and four will experience an alteration between 30%- 32%. When considering the alternative mid-teen retained VSC value, endorsed by the GLA and the Planning Inspectorate in the Appeal Decisions identified, all six windows will meet the alternative target value. Furthermore, the six windows which fall short of the accepted VSC value of 27, will retain a proposed value between 25 and 26.5.

- 8.196 The NSL daylight analysis when reviewing on a room basis, demonstrates that of the six rooms assessed, five (83.3%) will meet the BRE criteria. The one rooms that does not meet the BRE criteria, will experience a percentage alteration of 23.2%. The one room that does not meet the recommended NSL value (F01/R1) is located on the first floor. The room will retain a 76.4% view of the sky contour. The contour plot for this room indicates that in the proposed scenario the visibility of the sky will be retained in the key areas of the room (i.e. the areas closest to the window) which are arguably the most important amenity space within the room. In addition, the daylight distribution within this room is already exceptionally high in the existing condition (99.4%) as the room overlooks an undeveloped parcel of land. Therefore, the percentage alteration is unlikely to result in an unacceptable loss of amenity.
- 8.197 Overall, although there are changes in daylight and sunlight, the retained values are considered reasonably good, or are within the mid-teen values and appear to be contextually comparable. The impacts are therefore considered acceptable, on balance against the urban grain of the location and are outweighed by the benefits the Proposed Development will bring to the Borough.

5 and 5a Cockfosters Parade

- 8.198 5 and 5a Cockfosters Parade are located west of the development site and the first and second floors are in residential use. There are 4 windows serving two rooms that have been considered relevant for assessment within the property.
- 8.199 In relation to daylight (VSC and NSL), one of the two (50%) rooms will achieve compliance. Of the four windows assessed, one (25%) will adhere to the BRE Guidelines for VSC. Of the three windows that do not meet the BRE criteria, all three will experience an alteration of c.32%. When considering the alternative mid-teen retained VSC value, all three windows will meet the alternative target value. Furthermore, the three windows which fall short of the accepted VSC value of 27, will retain a proposed value between 24.7 and 24.8.
- 8.200 The NSL daylight analysis when reviewing on a room basis, demonstrates that of the two rooms assessed, both (100%) will meet the BRE criteria.
- 8.201 Overall, although there are changes in daylight and sunlight, the retained values may be considered reasonably good, or are within the mid-teen values and appear to be contextually comparable. The impacts are therefore considered acceptable, on balance against the urban grain of the location and are outweighed by the benefits the Proposed Development will bring to the Borough.

6-7 Cockfosters Parade

- 8.202 6-7 Cockfosters Parade is located west of the development site and the first and second floors are in residential use. There are eight windows serving four rooms that have been considered relevant for assessment within the property.
- 8.203 In relation to daylight (VSC and NSL), two of the four (50%) rooms will achieve compliance. Of the eight windows assessed, two (25%) will adhere to the BRE Guidelines for VSC. Of the six windows that do not meet the BRE criteria, three will

experience an alteration between 27%-29% and three will experience alterations between 30% 32%. When considering the alternative mid-teen retained VSC value, all six windows will meet the alternative target value. Furthermore, the six windows which fall short of the accepted VSC value of 27, will retain a proposed value between 24.8 and 25.9.

8.204 The NSL daylight analysis when reviewing on a room basis, demonstrates that of the four rooms assessed, all four (100%) will meet the BRE criteria.

8.205 Overall, although there are changes in daylight and sunlight, the retained values may be considered reasonably good, or are within the mid-teen values and appear to be contextually comparable. The impacts are therefore considered acceptable, on balance against the urban grain of the location and are outweighed by the benefits the Proposed Development will bring to the Borough.

8 Cockfosters Parade

8.206 8 Cockfosters Parade is located west of the development site and the first and second floors are in residential use. There are four windows serving two rooms that have been considered relevant for assessment within the property.

8.207 In relation to daylight (VSC and NSL), one of the two (50%) rooms will achieve compliance. Of the four windows assessed, one (25%) will adhere to the BRE Guidelines for VSC. Of the three windows that do not meet the BRE criteria, all three will experience an alteration between 31%- 34%. When considering the alternative mid-teen retained VSC value, all three windows will meet the alternative target value, retaining a proposed value between 16- 18.

8.208 The NSL daylight analysis when reviewing on a room basis, demonstrates that of the two rooms assessed, all two (100%) will meet the BRE criteria.

8.209 Overall, although there are changes in daylight and sunlight, the retained values may be considered reasonably good, or are within the mid-teen values and appear to be contextually comparable. The impacts are therefore considered acceptable, on balance against the urban grain of the location and are outweighed by the benefits the Proposed Development will bring to the Borough.

9 and 9a Cockfosters Parade

8.210 9 and 9a Cockfosters Parade are located west of the development site and the first and second floors are in residential use. There are four windows serving two rooms that have been considered relevant for assessment within the property.

8.211 In relation to daylight (VSC and NSL), one of the two (50%) rooms will achieve full compliance. Of the four windows assessed, one (25%) will adhere to the BRE Guidelines for VSC. Of the three windows that do not meet the BRE criteria, two will experience respective percentage alterations of 28% and 29% and one will experience an alteration of c.30%. When considering the alternative mid-teen

retained VSC value, all three windows will meet the alternative target value, retaining a proposed value of circa 18.

8.212 The NSL daylight analysis when reviewing on a room basis, demonstrates that of the two rooms assessed, all two (100%) will meet the BRE criteria.

8.213 Overall, although there are changes in daylight and sunlight, the retained values may be considered reasonably good, or are within the mid-teen values and appear to be contextually comparable. The impacts are therefore considered acceptable, on balance against the urban grain of the location and are outweighed by the benefits the Proposed Development will bring to the Borough.

10 and 10a Cockfosters Parade

8.214 10 and 10a Cockfosters Parade are located west of the development site and the first and second floors are in residential use. There are four windows serving two rooms that have been considered relevant for assessment within the property.

8.215 In relation to daylight (VSC and NSL), one of the two (50%) rooms will achieve compliance. Of the four windows assessed, one (25%) will adhere to the BRE Guidelines for VSC. Of the three windows that do not meet the BRE criteria, all three will experience a percentage alteration between 27%-29%. When considering the alternative mid-teen retained VSC value, all three windows will meet the alternative target value, retaining a proposed value of circa 18.

8.216 The NSL daylight analysis when reviewing on a room basis, demonstrates that of the two rooms assessed, all two (100%) will meet the BRE criteria.

8.217 Overall, although there are changes in daylight and sunlight, the retained values may be considered reasonably good, or are within the mid-teen values and appear to be contextually comparable. The impacts are therefore considered acceptable, on balance against the urban grain of the location and are outweighed by the benefits the Proposed Development will bring to the Borough.

11 and 11a Cockfosters Parade

8.218 11 and 11a Cockfosters Parade are located west of the development site and the first and second floors are in residential use. There are four windows serving two rooms considered relevant for assessment within the property.

8.219 In relation to daylight (VSC and NSL), one of the two (50%) rooms will achieve compliance. Of the four windows assessed, one (25%) will adhere to the BRE Guidelines for VSC. Of the three windows that do not meet the BRE criteria, all three will experience a percentage alteration between 25%-27%. When considering the alternative mid-teen retained VSC value, all three windows will meet the alternative target value, and will retain a proposed value of circa 18.

8.220 The NSL daylight analysis when reviewing on a room basis, demonstrates that of the two rooms assessed, all two (100%) will meet the BRE criteria.

8.221 Overall, although there are changes in daylight and sunlight, the retained values may be considered reasonably good, or are within the mid-teen values and appear to be contextually comparable. The impacts are therefore considered acceptable, on balance against the urban grain of the location.

12 Cockfosters Parade

8.222 12 Cockfosters Parade is located west of the development site and the first and second floors are in residential use. There are four windows serving two rooms considered relevant for assessment within the property.

8.223 When considering daylight, one of the two (50%) rooms will achieve compliance. Of the four windows assessed, two (50%) will adhere to the BRE Guidelines for VSC. Of the two windows that do not meet the BRE criteria, both will experience a percentage alteration between 21%-22%. When considering the alternative mid-teen retained VSC value, all three windows will meet the alternative target value, with the windows retaining a proposed value between in excess of 19.

8.224 The NSL daylight analysis when reviewing on a room basis, demonstrates that of the two rooms assessed, all two (100%) will meet the BRE criteria.

8.225 Overall, although there are changes in daylight and sunlight, the retained values may be considered reasonably good, or are within the mid-teen values and appear to be contextually comparable. The impacts are therefore considered acceptable, on balance against the urban grain of the location and are outweighed by the benefits the Proposed Development will bring to the Borough.

Churchwood & Holbrook House (Blackhorse Tower)

8.226 Blackhorse Tower is located south of the development site. In July 2021, a Prior Approval application was granted for change of use from offices (B1(a)) to residential (C3) to provide 216 residential units within the buildings of Blackhorse Tower, Holbrook House And Churchwood House, 116 Cockfosters Road and land within its curtilage for associated use (application reference 21/02222/PRJ). This proposal has been commenced on site and works are currently underway.

8.227 Whilst the building is currently a vacant office, the applicant has assessed the potential daylight and sunlight in connection with the residential scheme approved and has deemed the No Sky Line (NSL) and the Average Daylight Factor (ADF) assessment most relevant to understand the proposed daylight conditions. The purpose of the ADF assessment is to ascertain whether the proposed residential accommodation will provide future occupants with accommodation considered acceptable in terms of daylight and sunlight. The property does not require sunlight consideration due to the orientation of the windows from the site.

8.228 GIA have updated their original 3D model with the internal layouts obtained from the recently granted prior approval application for the Blackhorse Tower (ref. 21/02222/PRJ) and the approved 'bolt on' application (ref. 21/02589/FUL) and

completed an updated assessment to understand the potential effects that the Proposed Development will have on this scheme. Whilst it is not considered appropriate to review the percentage changes as there is no current occupier experiencing the existing levels of light, there would be a 75.8% compliant rate when reviewing the VSC analysis.

- 8.229 The NSL daylight analysis when reviewing on a room basis, demonstrates that of the 224 rooms assessed, 211 (98.7%) will meet the BRE criteria. Of the three rooms that will not meet the BRE criteria for NSL, it is understood two to be bedrooms and the other to be a Living Kitchen Diner (LKD). The bedrooms will retain respective proposed values of 41% and 77%. The primary use for these rooms is for sleeping and they will therefore have a lesser requirement for daylight. This is reflected at paragraph 2.2.8 of the BRE Guidelines which states that when considering the impact on daylight distribution, "*bedrooms should be analysed although they are less important*". Turning to the one remaining LKD, located on the ground floor, it will retain a proposed value of 54.9, enabling over 50% of the room to retain a view of the sky.
- 8.230 Of the 23 living kitchen diners assessed for ADF, 21 (91%) will meet the recommended target criteria of 2. The ADF results suggest the absolute loss for the two windows that do not meet the ADF proposed value, is between 1.0 and 1.1. Both windows retain a proposed value in excess of 1.5, which is the target value for a living room. Often when designing open plan living spaces, the kitchen part of the LKD is at the back of the room. This is the case in the majority of this building. Although there will be a change in light to the LKD's the main living space will still have a view of the sky dome at table top height and thus have the potential to receive natural light. Of the 39 living rooms assessed for ADF, all 39 (100%) will meet the recommended target value of 1.5. Of the 141 bedrooms assessed for ADF, all 141 (100%) will meet the recommended target value of 1. Of the 13 winter gardens assessed for ADF, all 13 (100%) will meet the recommended target value of 1.5. An overall compliance of 99% is achieved when assessing this property against the ADF criteria set out in the BRE guidelines.

Sunlight to neighbouring properties - APSH

- 8.231 For all the assessed properties for sunlight, GIA has explained that they do not require sunlight consideration due to the orientation of the windows facing the site. In their review, Hollis agree with these findings.
- 8.232 In respect of Blackhorse Tower (Accessible Block), the APSH sunlight analysis demonstrate that 100% compliance against the BRE criteria will be achieved for summer and winter months.

Overshadowing assessment

- 8.233 An overshadowing assessment has not been undertaken as there are no gardens or amenity spaces, as defined in the BRE guide, that are located close enough to the proposed development to be adversely affected by overshadowing.

Conclusion

- 8.234 The proposal has been assessed in accordance with the BRE Guidelines. When constructing buildings in an urban environment, alterations in daylight and sunlight to adjoining properties are often unavoidable. The numerical guidance given in the BRE document should therefore be treated flexibly, especially in urban environments.
- 8.235 The daylight and sunlight numerical impacts have also been considered in the context of Policy D6 of the London Plan as well as the Housing SPG.
- 8.236 In relation to the VSC assessment for the 10 neighbouring properties impacted, Hollis's review has identified that of the 441 windows assessed for VSC, 125 (28%) of these will fall short of the BRE's numerical criteria. The uses of the rooms that fall short of the BRE's numerical criteria are unknown. As part of their assessment, GIA have reviewed both the Council's planning portal and estate agent / property websites such as Zoopla and Rightmove. This review did not locate any detailed floor plans for the properties located along Cockfosters Parade. Furthermore, given that the properties in question relate to the first and second floors of the buildings, it has not been possible to visually identify the use of each room. GIA's Daylight Sunlight Addendum has therefore adopted a worst-case scenario and assumed that all rooms considered relevant for assessment along Cockfosters Parade are living rooms. The revised assessment shows that the majority of impacted rooms will retain VSC levels in excess of 20. Some units, however retain values between 17-19, which would meet the "mid teen" value approach, and therefore may be considered as an adequate level of light within this urban locale.
- 8.237 Overall, where properties experience reductions in VSC beyond the guidelines, all windows will retain VSC proposed values that will meet the alternative mid-teen criteria, with the majority achieving values in excess of 20 which is considered good within an urban location such as this.
- 8.238 The Mayor of London's Housing SPG (2016) supports the need for sensible application of the numerical criteria, at paragraph 13.45 where it states: *'An appropriate degree of flexibility needs to be applied when using BRE Guidelines to assess the daylight and sunlight impacts of new development on surrounding properties, as well as within developments themselves. Guidelines should be applied sensitively to higher density development, especially in opportunity areas, town centres, large sites and accessible locations, where BRE advice suggests considering the use of alternative targets. This should take into account local circumstances; the need to optimise housing capacity; and scope for the character and form of an area to change over time'*.
- 8.239 As the BRE Guidelines also suggest that different target values may be used in special circumstances, it is considered that weight should be given to the retained daylight levels and not just the percentage change, given the urban grain of the location.
- 8.240 In relation to NSL, the majority of properties assessed will meet the recommended guidance levels. Only one room within 2-2a, 3a, 4-4a Cockfosters Parade will fall

short of the BRE's numerical criteria, retaining a 77% view of the sky contour. Where there are alterations in excess of 20%, these are isolated to a small number of rooms. The analysis suggests that the majority will continue to enjoy a view of the sky in excess of 50% and in some instances in excess of 75%.

- 8.241 Based on the context of the site, the proposed daylight level reductions should be considered against the high levels of existing daylight currently experienced by the windows and rooms of the existing residential properties assessed as they currently face onto an uncharacteristically vacant parcel of land. Against this backdrop, it is not considered that unacceptable impacts would be caused to the neighbouring properties. Furthermore, it should be appreciated that any scheme that seeks to address the townscape of an undeveloped parcel of land will undoubtedly create alterations beyond the suggested recommendations set out in the BRE Guidelines.
- 8.242 Considering all aspects in terms of daylight and sunlight, the proposed scheme does result in some adverse and noticeable reductions in daylight but for such reductions, these need to be considered in reference to the detail and background to the particular property under review. Clearly, there is a degree of adversity to the daylight to some of the residential neighbouring properties resulting from the proposed massing. This degree of adversity primarily relates to the windows / rooms within the areas identified above and is compounded by the fairly minimal existing massing on the application site, which is unusual in an urban context. In terms of sunlight, the proposal adheres to the BRE Guide.
- 8.243 Given the target compliance to the BRE Guide is not mandatory, it is reasonable to say that given the effect to some neighbouring properties in terms of daylight reduction, the overall merits of the scheme will have an influence on the balance of acceptability (in terms of isolated harm versus the benefits). However, for an urban scheme of this nature, it is considered that the adversity impact could be considered acceptable.
- 8.244 The Proposed Development therefore complies with the local policy tests in relation to daylight amenity set out in Policy DMD 8 of the Local Plan. Where BRE departures occur, the alterations are considered in most instances to be within the inherent flexibility of the BRE Guidelines. In consideration of the retained levels of light exceeding the alternative 'mid-teen VSC proposed values and coupled with the benefits the scheme will bring to the borough, the design of the proposed development, the impacts are considered acceptable from a daylight perspective.

Outlook, Privacy and Overlooking

- 8.245 As shown in **Figure 5** above, the development has been designed to ensure no undue overlooking or loss of privacy to neighbouring residential properties. All existing neighbouring residential properties are located well in excess of 21m from the proposed blocks and therefore no undue loss of outlook or privacy would arise to these properties.
- 8.246 With respect to the possible implications on amenity by way of overlooking and impact on privacy to the proposed development at Blackhorse Tower were it to go

ahead, this has been addressed through the careful positioning of windows and balconies to minimise the potential for overlooking. The application has demonstrated that there will be no significant and detrimental overlooking, overbearing or loss of outlook that the proximity of Block 4 would cause to the Black Horse Tower. Policy DMD 10 of the Local Plan sets a minimum distance of 11m between windows and side boundaries which is exceeded by the proposals. At its closest point, Block 4 would be located 15.6m from the northern flank elevation of Blackhorse Tower which is considered to be an acceptable distance to ensure no undue impact to its future occupiers.

- 8.247 Given the separation distances proposed and positioning of the proposed windows and amenity areas, the proposed development would not appear visually overbearing or result in any undue overlooking or loss of privacy to neighbouring residential properties.

Noise and Vibration

- 8.248 Guidance relevant for the assessment of noise affecting new developments is given in the National Planning Policy Framework (NPPF). Paragraph 185 sets out that new development should be appropriate for its location, taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should seek to a) 'mitigate and reduce to a minimum, potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life'.
- 8.249 Meanwhile Policy D14 of the London Plan sets out that in order to reduce, manage and mitigate noise to improve health and quality of life, residential... development proposals should manage noise by, amongst other things: '3) mitigating and minimising the existing any potential adverse impacts of noise on, from, within, as a result of, or in the vicinity of new development without placing unreasonable restrictions on existing noise generating uses', and '4) improving and enhancing the acoustic environment and promoting appropriate soundscapes...'. Lastly, the London Plan introduces the concept of 'Agent of Change' which places the onus on the new development to ensure adequate noise mitigation measures are in place if their development will be close to a noise generating use.
- 8.250 No objection has been raised by the Council's Environmental Health Section to the proposal. The proposed predominantly residential development, with replacement Train Drivers Accommodation and a flexible retail unit (Class E and/or Sui Generis) incorporated, is consistent with the existing prevailing uses in the area and it is therefore unlikely that any unacceptable levels of noise will be generated as result of the proposal. Furthermore, in terms of general disturbance, the current use of the site is as a public car park and Train Drivers Accommodation. The current proposal is for a predominantly residential development with much reduced levels of car parking. The pattern of people's movements will perhaps change, with comings and goings likely to be more spread out throughout the day, but it is unlikely to generate more general disturbance than the office use. The removal of the majority of car parking

from the site is likely to reduce general disturbance for nearby residential occupiers.

Light Pollution

- 8.251 It is recognised that there is the potential for some level of light pollution arising from the development as the buildings are larger and taller than that previously on site. However, it is not considered light generating from the flats would be unreasonable given they are expected to be used in a normal residential fashion. A planning condition is recommended that details of any external lighting are provided by condition to ensure that this will be acceptable in relation to existing neighbouring residents and future occupiers of the development. As well as ensuring that there is not an unacceptable impact on the Trent Park Conservation Area, neighbouring Green Belt and other heritage assets.

Conclusion of Neighbouring Amenity Considerations

- 8.252 Having regard to the above, the proposed development is, on balance, considered acceptable in relation to the impact on neighbouring residential amenity in line with relevant policies DMD 8, 37 & 68 and CS Policy 4 of the Local Plan and Policies D4, D6 and D14 of the London Plan. A condition pertaining to external lighting is recommended to ensure that an acceptable level of residential amenity is maintained.

Transport, Access, Servicing and Parking

- 8.253 The NPPF at paragraph 112 states that development should:

- Give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;
- Address the needs of people with disabilities and reduced mobility in relation to all modes of transport;
- Create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;
- Allow for the efficient delivery of goods, and access by service and emergency vehicles; and
- Be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.

- 8.254 Paragraph 111 of the NPPF also states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

- 8.255 Policy T1 of the London Plan sets a strategic target of 80% of all trips in London to be by foot, cycle or public transport by 2041 and requires all development to make the

most effective use of land. Policy T5 encourages cycling and sets out cycle parking standards and Policies T6 and T6.1 to T6.5 set out car parking standards. Policy T6.1 (Residential car parking) of the London Plan, states there should be no general car parking for the new residential units, save for blue badge spaces.

8.256 Other key relevant London Plan policies include:

- Policy T2 – which sets out a ‘healthy streets’ approach to new development and requires proposals to demonstrate how it will deliver improvements that support the 10 Healthy Street Indicators;
- Policy T3 – which requires new development to safeguard sufficient and suitable located land for public and active transport;
- Policy D13 – which requires promoters of housing close to noise generating uses (including transport facilities) to be designed in accordance with Agent of Change principles;
- Policy T4 – which calls for development to reflect and integrate with current and planned transport access, capacity and connectivity and, where appropriate, mitigate impacts through direct provision or financial contributions; and
- Policy T7 – which makes clear that development should facilitate safe, clean and efficient deliveries and servicing and requires Construction Logistics Plans and Delivery and Servicing Plans.

8.257 Core Policies 24, 25 and 26 of the Local Plan aim to both address the existing deficiencies in transport in the Borough and to ensure that planned growth is supported by adequate transport infrastructure that promotes sustainable transport choices. DMD 45 makes clear that the Council aims to minimise car parking and to promote sustainable transport options.

8.258 Policy T2 of the London Plan requires development to facilitate and promote short, regular trips by walking or cycling and reduce car dominance. Policy T6 sets out the requirement for car-free development to be the starting point for all sites well-connected by public transport. Policy T9 notes that where development is car free, provision must be made for disabled persons parking and adequate space for deliveries and servicing and, in instances where a car-free development could result in unacceptable impacts off-site, these should be mitigated through planning obligations.

8.259 Local Plan policies aim to both address the existing deficiencies in transport in the Borough and to ensure that planned growth is supported by adequate transport infrastructure that promotes sustainable transport choices. Specifically, Core Policy 25 requires development to prioritise pedestrian and cycle public realm improvements that contribute to quality and safety; Core Policy 24 requires development to deliver improvements to the road network, and Core Policy 26 requires development to ensure a safe, accessible, welcoming and efficient public transport network. The underlying approach is to ensure that travel choice across the Borough is enhanced so as to provide everyone with the opportunity to decide how they choose to travel, be that by car, public transport or walking and cycling. Policy

DMD 45 Parking Standards and Layout states that the Council aims to minimise car parking and to promote sustainable transport options.

Car Parking – Overall Provision

8.260 The site currently consists of 407 dedicated parking spaces (including 37 for London Underground staff and 12 for blue badge users). There is a total of 370 public parking spaces available (358 excluding blue badge holders), spread out over two car parks.

Car Parking - Residential Assessment

8.261 The London Plan maximum parking standard for the residential component of the proposal is between 176-263 parking spaces. It is important to note that this is a maximum standard based on the site being within a PTAL 4 location. However, the site is located immediately adjacent to Cockfosters station, located within Cockfosters town centre with shops and amenities and good bus connections.

8.262 On this basis, the parking standard in Policy T6, part B of the London Plan which states *“car-free development should be the starting point for all development proposals in places that well connected to public transport”* should be considered applicable to the proposal. As such, a ‘car free’ approach takes precedence over aiming to meet the maximum standards referenced above.

8.263 The main residential component of the site is ‘car free’, with the exception of the 11 x disabled bays (3%) for future residents with the scope for a further 7% disable space provision (24 x bays) should demand arise, which is welcomed. The remaining bays are made up of the following:

- 35 general use spaces for the public;
- 12 public blue badge spaces (re-provision);
- 7 drop-off/pick-up spaces for the public;
- 1 car club space for residents and the public;
- 1 LUL blue badge space; and
- 1 taxi electric charging bay.

8.264 It is noted that London Plan policies support ‘car free’ developments in areas with a good PTAL, but consideration also needs to be given to the local area, in terms of the impact of ‘car free’ schemes on local amenity and parking pressures.

8.265 The site is not located within a CPZ, therefore ‘car free’ is not possible to enforce in terms of preventing occupants owning a car through prevention of owning a parking permit. Therefore, whilst zero parking spaces are being provided for residents, there is still the potential that the site will generate car ownership, and that occupants could park on the surrounding roads, and significantly increase local parking pressures (subject to other parking restrictions e.g. double yellow lines).

8.266 Further investigation of the existing parking restrictions in the local area shows that it is currently difficult to park within 200m of the site, due to a combination of double yellow line restrictions at any time, and single yellow line restrictions between 8am –

9.30am and 4.30pm – 6.30pm, and restrictions on Cockfosters Road between 8am-8pm on Sundays and Bank Holidays between May and September.

- 8.267 However, slightly beyond the 200m radius, including Westpole Avenue and Mount Pleasant, there are on street parking spaces free from restrictions, and these could be used by both commuters and by residents, should they own a vehicle. Both these roads have been subjected to parking surveys to quantify the level of on street parking available and the results are discussed further on in this report.
- 8.268 Unless mitigation is provided in the form of additional parking controls, then on the basis of the existing conditions, the Council's Transport section have concerns that the 'car free' aspect of the site will unavoidably lead to an increase in parking pressure on surrounding roads, from both residents and commuters.
- 8.269 The introduction of a CPZ would help alleviate these concerns, but it is recognised that there are associated problems with this approach, including the cost of permits for residents. However, future occupants of the development could be prevented from owning parking permits, thereby preventing them from being able to park within the zone and protecting the available spaces for existing residents.
- 8.270 As such, were permission to be granted, the applicant would be required by s106 to pay the costs associated with the design and implementation of any future CPZ.

Car Parking - Station Assessment

8.271 The station car parks will be lost as part of the development and replaced with 11 x spaces for blue badges (residents), 47 x spaces for the station (including 12 x spaces for blue badges), and 7 x spaces just for drop off and pick up. A car club and a taxi charging bay would also be provided.

8.272 The existing and proposed car parking provision is as shown in **Table 10** below:

Car Parking	Station Parking (general)	Station Parking (blue badge)	Blue badge (Resi)	LUL	Drop off / pick up	Car Club	Taxi Charging	Total
Existing	358	12	0	37	6	0	1	414
Proposed	35	12	11	1*	7	1	1	68

Table 10 – Existing and proposed car parking

*This would be a blue badge space

Loss of existing public car parking

8.273 Significant objection has been raised from the consultation process in relation to the loss of the public car park. The loss of 323 no. public car parking spaces (non-blue badge) will mean car park users either: find alternative ways to travel to their destination; park in neighbouring streets outside the existing nearby Controlled Parking Zones, or inside if able; or relocate to other stations. Officers have scrutinised five sets of information / data / surveys to assess existing carpark use,

consider the likelihood of potential behaviour change and understand the type of mitigation to secure in order to best support the modal shift proposed.

8.274 In order to ascertain the impact of the loss of the car park, parking surveys were undertaken within the existing car parks. The surveys, as set out in the Transport Assessment (TA) submitted, consisted of parking accumulation surveys to determine how heavily used the car parks were over the survey days, and questionnaires to obtain information including where users of the car park came from, and their reason for travel.

8.275 A summary of the results is shown in **Table 11** below:

Car Park A		Notes
Total Spaces	354	
Max Occupancy Weekday	322 (91%)	Thursday at 13.45
Max Occupancy Weekend	271 (76%)	Saturday at 12.45, 13.45, 14.00 & 14.45
Car Park B		
Total Spaces	53	
Max Occupancy Weekday	49 (92%)	Thursday at 15.15
Max Occupancy Weekend	35 (66%)	Saturday at 13.15

Table 11 – Summary of Parking Survey Results (TA) Thursday 10/10/19 & Saturday 12/10/19

8.276 The results above are included in the TA, however further discussion is limited. The conclusion from the TA is that the existing car parks are never fully occupied (a combined maximum of 90% (366 spaces) occupied, and 10% (41 spaces) available). Although it is accepted the car parks do not exceed their capacity, it is acknowledged that a significant number of cars make use of the existing car parks.

8.277 In terms of the impact of removing a significant of the parking spaces, the surveys show that overspill parking will occur, unless travel behaviours change. Only 47 (including 12 blue badge) replacement spaces are being provided, which at the peak levels of occupancy of the proposed car park, would only provide for 47 out of 366 vehicles (12%). The worst-case scenario would therefore be displacement of 319 vehicles to parking on the surrounding roads.

8.278 Whilst the above is a worst-case scenario, it should be noted that for most of the day (from 8am until 6pm), over 200 bays are occupied in total between the two existing car parks, suggesting that there is the potential for significant overspill parking not just at the peak occupancy times.

8.279 As per the mitigation to prevent residents owning vehicles, a Controlled Parking Zone (CPZ) would also prevent overspill of commuter parking into the surrounding residential roads. Although a CPZ could be put in place before the residential units are occupied, there is a concern that there may not be time to implement one should the car park be closed at short notice, if approval is granted. The Council's Transport

Section have therefore requested a suitable notice period is given in advance of the car park being closed, with the detail to be secured by s106 legal agreement.

Carpark Questionnaire Survey Assessment

8.280 In addition to the car park occupancy surveys, questionnaires were also undertaken on individuals using the car park. These asked questions concerning the purpose of the trip, and the home postcode of the respondent. The surveys were undertaken by a third party and had over 393 responses. This is considered to be a robust response rate, and the surveys further help to assess the impact in the local area as a result of the development.

8.281 The submitted TA also explains that user surveys of the car park were undertaken (Tracsis) between 27th June 2018 and 1st July 2018. The surveys indicate that the main trip purposes for the users were for travel to/ from work (weekdays) and leisure (weekends). Review of the trip origin data in the survey responses are tabulated in **Table 12** below.

78%	trip origins outside M25
94.6%	of car park users have a closer underground / overground / National Rail station than Cockfosters.
18%	within walking distance of a bus stop that serves Cockfosters Station
2.5%	within M25 and more than 960m away from any other station, or 640m away from a bus stop for a route which serves Cockfosters Station.
10.5%	have their trip origin inside the London Borough of Enfield
8%	have their trip origin inside London Borough of Barnet

Table 12 – Summary of trip origin car park data findings

8.282 The above survey data suggests users of the car parks have access to alternative public transport options – shown by the result of 97.5% of users making trips within the M25 living within 640m of a bus stop to Cockfosters Station or within 960m of a station.

8.283 Notwithstanding the alternative options available, it is noted that the main reason for using Cockfosters Station will be convenience and directness, and if it is still possible to park near the station, albeit with a short walk involved, then it still may be the preferable option to some users.

8.284 The majority (78%) of users being impacted by the loss will be outside of Enfield (outside of the M25). This suggests the station is being used a park and ride facility by commuters outside of the tube zones. The removal of these trips is likely to be the removal of trips from Cockfosters as a whole, and in this respect, will offer some benefit in terms of reducing the local traffic.

On-street Parking Surveys

8.285 Parking surveys were undertaken by a third party within 960m walking distance of the station, which is the distance used in the TFL PTAL calculation. It is also relevant to note the walking distances set out in **Table 13** below, which differ between commuter parking and residential parking:

	Town centres (m)	Commuting/School Sight-seeing (m)	Elsewhere (m)
Desirable	200	500	400
Acceptable	400	1000	800
Preferred maximum	800	2000	1200

Table 13 – Suggested acceptable walking distance - IHE Guidelines for providing for journeys on foot (2000)

8.286 For clarity, the residential acceptable walking distance is 200m based on Lambeth Methodology, the commuter acceptable walking distance is 1000m based on the IHE, and the commuter acceptable walking distance is 960m based on TFL PTAL methodology i.e. PTAL increases in areas 960m walking distance from a tube station.

8.287 This means that residents are unlikely to own a vehicle if they cannot park within 200m of their property, and commuters are unlikely to drive to a train / tube station if they have to park over 1000m away.

8.288 The parking surveys undertaken show the following:

- 40% (1150) of all possible parking spaces (unrestricted) were available within 960m of the site; and
- Of these, 450 spaces were within 400m.

8.289 It is noted that the area within 200m of the site is heavily controlled with existing restrictions. The results show that whilst future residential occupants would be limited in terms where they could park, as there are very few spaces within 200m of the site, commuters, who generally have a longer acceptable walking distance tolerance level of 1000m, would have access to over 1000 unrestricted spaces.

8.290 At the peak occupancy of the car parks, 366 out of 1150 on street spaces could be occupied. On a more general level, throughout the day, it is likely that 200 out of 1150 spaces could be occupied. This equates to 27% and 17% of existing spaces being occupied, although it should be noted the spaces closer to the station will be occupied first, which would result in 366 out of 450, and 200 out of 450 being taken. This equates to 81% and 44%, which are levels that would materially impact on local amenity, for a number of reasons; increased traffic, increased vehicle movements, increased pollution, fewer parking spaces for residents, fewer parking spaces for deliveries.

8.291 A further breakdown of the results shows that of the nearest road likely to be used for parking (Westpole Avenue), at the time of maximum parking occupancy (17:30) 81 spaces out of 127 were occupied, leaving 54 spaces. The distribution of the spaces along the road is not shown in the surveys, but it is noted that the full length of

Westpole Avenue, c.500m, was included in the survey. It is noted that the other road (Mount Pleasant) most likely to be used for parking, is located within Barnet.

Drop off / pick up

- 8.292 One of the limitations of the parking surveys are that they do not show the number of pick up and drop offs taking place at the station. This is because unlike some stations (e.g. Arnos Grove), the station does not have free parking for a limited time.
- 8.293 In the absence of any drop off and pick up data for Cockfosters Station, the drop off data for Arnos Grove station has been reviewed. This showed that Arnos Grove station has an estimated maximum of 13 drop offs between 9am-10am on a weekday (the peak for drop offs), and 31 drop offs between 4pm-5pm on a weekend. Over the course of a weekday, a total of 171 drop offs took place at Arnos Grove, and 246 on a Saturday.
- 8.294 Although these figures are a useful comparison, they do not show the maximum being dropped at any one-time i.e. maximum occupancy of the drop off bays. However, over the course of one hour, it is unlikely that more than seven bays (the proposed no. of drop bays in the subject application), would be occupied at the same time, to allow 13 drop offs. It is noted this is more likely to occur during the weekend peak, when 31 drop offs took place over one hour, however the quick turnaround of the spaces means even this activity is unlikely to require more than seven bays.
- 8.295 On this basis, the proposed seven drop off bays are likely to be sufficient for the station, although it should be noted that drop off surveys for Cockfosters Station have not been submitted, and the above is based on the Arnos Grove figures. Although the seven bays are likely to be sufficient, the Council's Transport section do have concerns that the layout is not the optimum arrangement in terms of allowing ease of access and manoeuvring space and have requested that the final layout of these bays be conditioned. This is discussed further in the report with access arrangements.

Trip Generation

- 8.296 In addition to the trips generated to the car park for use of the station, the net increase of 351 residential units will also generate their own trips, including cycle trips, pedestrian trips, public transport trips, delivery/service trips, and visitor trips.
- 8.297 It is noted the site is 'car free', apart from the disabled bays proposed, but not in a CPZ (although parking restrictions in the local area are tight). On this basis, vehicular trips by future residents of the development are unlikely to have a significant impact and will be mitigated through the implementation of a potential CPZ to be secured by s106.
- 8.298 Notwithstanding this, the low level of parking proposed means there will be a high number of pedestrian and cycle trips generated from the site, and potentially visitor trips by car. The TA includes estimated trip numbers across all modes for the whole site, based on a trip rate per unit. These are shown in **Table 14** below:

Time	In	Out	Total
08:00-09:00	0.075	0.411	0.486
17:00-18:00	0.252	0.153	0.405
Daily rate	2.06	2.29	4.35
Daily trips	723	804	1527

Table 14 – All mode trips per dwelling (351 dwellings) (TA)

8.299 The above estimates show a total of 1527 daily trips to and from the site. This figure is for all mode trips.

8.300 To gain an understanding of the proportion of different modes, the TA examines the census data on modal share of journeys to work for the local dataset for Cockfosters area, and an area in Islington, considered to be representative of a more aspirational sustainable transport modal share i.e. more journeys on foot and bicycle.

8.301 The use of the Islington census data is considered acceptable, as it makes the approach more robust, having regard to the potential of the site to generate more cycle and pedestrian trips. The expected modal split and the number of associated trips is shown in **Table 15** below. This excludes the number of vehicle trips, estimated at being 51 per day, which will be from the disabled bay provision. This is not considered a significant number to require further examination.

Mode	Enfield Modal Share (census)	No. of trips	Islington Modal Share (census)	No. of trips
WFH	19%	2	4%	59
Underground	34%	502	48%	708
Train	21%	310	8%	118
Bus	8%	118	16%	236
Motorcycle	1%	15	1%	15
Taxi	1%	15	0%	0
Car passenger	5%	74	1%	15
Cycle	1%	15	10%	148
Walk	9%	133	11%	162
Other	2%	30	1%	15

Table 15 – Estimated trip generation from site (not including vehicle trips which are 51) - approximate figures based on TA Table 5.5

- 8.302 The main concern with the estimated figures above is with the walking and cycling trips. There will be an estimated 148 cycle trips per day, and 162 walking trips per day (note this is 'journey to work' data so actual figures are likely to be higher when shopping and leisure trips are included).
- 8.303 The Council is committed to increasing active travel, such as walking and cycling, and through TFL funding and development contributions, is rolling out Healthy Streets initiative in the borough, with the aim of meeting the Mayor's Transport Strategy target of making 80% of trips by walking and cycling.
- 8.304 The development clearly has the potential to create additional walking and cycling trips on the existing network, and it is noted that although cycle share is relatively low at the moment, the provision of 597 cycle spaces (residential) and no car parking spaces, is likely to increase cycle trips in the area.
- 8.305 In order to mitigate this impact, the Council's Transport section have requested a contribution towards supporting these trips, to be secured with a S106 contribution.
- 8.306 There will also be an increase in the trips to the station made by the modes shown in **Table 15** above. It is therefore essential that the infrastructure is in place to support them, with cycle parking provided at the station. This will need to be of high quality to encourage uptake and should be considered in terms of supporting the loss of 323 spaces (of which c.10% of users are in Enfield, and therefore more within cycling distance of the tube station). The cycle parking should also be freely available to all users.
- 8.307 Due to the 'car free' nature of the residential proposal and significant reduction in public parking, vehicular traffic in the area is likely to fall (a reduction of over 1200 vehicular trips over a whole day period is predicted), which would not result in a material impact to the local highway network. It is expected that most trips will be by public transport, walking and cycling. As such, pedestrian movements will increase, and this could impact on the use of the existing pedestrian crossing, which in turn could increase the delays for traffic along Cockfosters Road. The sustainable transport contribution to be secured should also therefore go towards any further studies required to monitor traffic on Cockfosters Road.

Pedestrian / Cycle Access

- 8.308 Pedestrian and cycle access to Site A will be from existing access points from Cockfosters Road, while access for Site B will be from proposed open space adjacent to the station building. The design of the access would conform to the Mayor's Healthy Street principles where pedestrians and cyclists will be prioritised over vehicles. The footway should continue on both sides through the site and the public realm should be designed for low speed to minimise risk of conflicts between vehicles and vulnerable modes, adhering the Mayor's Vision Zero agenda. Full details are to be secured by condition.

Vehicular Access

8.309 Vehicle access to the site will be provided for both Site A and Site B. Access to Site A would be subject to a refresh of line markings at the site access and minor kerb realignments to the bell mouth of the junction. Access to Site B would be configured as a driveway style access due to fewer vehicles needing to enter and exit this area. A Stage 1 Road Safety Audit has been undertaken for the proposed access design and all issues identified would be addressed in the detailed design process.

Electric Vehicle Parking

8.310 Plan Policy T6.1(C) of the London Plan requires that at least 20% of new parking spaces should have active charging facilities, with passive provision for all remaining spaces. The applicant has provided a commitment to provide electric vehicle charging points (EVCP) to meet the above London Plan standard and this would be secured by condition.

Car Park Layout

8.311 The layout of the car park, as show in **Figure 4** above, is such that all the spaces meet the required minimum dimensions of 4.80m x 2.40m and have the required 6.0m turning space between rows, with disabled bays having additional width.

8.312 The 7 x spaces for pick up and drop off are located to the front of the car park. These bays will have the highest level of turnaround, with up to 13 drop off and pick-ups per hour weekday and 31 per hour weekend, should use be similar to that of Arnos Grove tube station.

8.313 The proposed 35 x spaces for public use could also be potentially used for dropping off, although it is noted they are likely to almost always be occupied, based on the existing survey data.

8.314 The car park is stated in the TA as being managed by a third party (currently NCP). This is welcomed, but there is a concern that, at least initially, cars could arrive at the car park to find it fully occupied, and then not able to turn around within the site. This potential problem could be addressed through the proposed Car Park Management Plan, with e.g. signage indicating the car park is full, or some additional turning space provided. Modal shift is likely to take place over time, but in the interim, there could be a conflict of vehicles fighting over the scaled back provision.

8.315 It is noted that the public car parking is not separate from the residential parking. There is no segregation between the parking allocations. This could lead to management issues, however there could also be constraints in terms of locating the disabled bays within proximity of the buildings which prevents grouping the parking separately. This further compounds the need for parking to be managed, as vehicles could end up driving through almost the whole length of the site looking for a parking space.

8.316 A draft Car Parking Management Plan has been submitted, which is welcomed. A full Car Parking Management Plan would be secured by condition along with s106 obligations to restrict any eligibility for local parking permits with an exception for

disabled users; and enforcement of public car parking (both long stay and pick up/ drop off spaces) in line with Policy T6 of the London Plan.

- 8.317 The layout for Site B only shows 2 x spaces for disabled users. This is an acceptable layout, and the area can also be used for servicing and delivery (see below).

Public Transport - Service Capacity

- 8.318 Based on the trip generation assessment for the proposed development (69 AM and 58 PM public transport trips), it is not expected that the proposed development would have a material capacity impact on either underground or bus services.

Healthy Streets and Vision Zero

- 8.319 An Active Travel Zone (ATZ) assessment has been undertaken; four routes have been studied and a number of local issues have been identified, which the Council may seek to secure improvements for. In particular there would be an increase in pedestrian activity within the Local Centre on Cockfosters Road whereby there may be potential to improve pedestrian crossing facilities and enhance safety.
- 8.320 It is welcomed that the proposals would provide an improved public realm with considerably fewer vehicle movements and lower speeds which enhances the pedestrian environment. Increased pedestrian activity from the proposals would also enable better sense of security.
- 8.321 An accident review was undertaken, there were a total of 62 collisions within the study area and all collisions are considered resultant of driver error. 12 of these collisions were serious with no fatal accidents recorded. To address the issues identified and in light of the increasing level of pedestrian activities to/ from the site, a s106 contribution to facilitate the ATZ improvements required would be secured in any permission granted.

Servicing and Delivery

- 8.322 Site A will be serviced from the same access point as for the car park and the drop off area. Turning areas are provided for vehicles, including refuse vehicle and fire tender. Swept path plans provided within Appendix G - the Delivery and Service Plan (DSP) of the TA confirms that a 10.20m long refuse vehicle can turn.
- 8.323 The DSP also has an estimated no. of delivery trips to the site per day. This is taken from existing Granger BtR sites and estimates there will be 15 deliveries per day. This figure, which has since been checked through comparison with other sites from the TRICS database, is considered to be towards the lower end of the possible range of delivery trips to the site, and there is the possibility up to 56 delivery trips per day could take place.
- 8.324 Although 15 deliveries are unlikely to have a significant impact on operation of the car park, it is noted that the car delivery vehicle turning areas are shared with residents' bays, and some of the drop off bays, and there is a concern that grouping

everything together will increase the chance of vehicle conflicts (and noise and disturbance). Should up to 56 deliveries / service trips take place, this would lead to congestion and possible informal and disruptive parking.

- 8.325 In order to mitigate against this, the Council's Transport Section has requested that some spaces are provided exclusively for delivery vehicles. This would be secured by condition and would prevent informal parking potentially causing problems with access, particularly as the car park does not have a segregated car park for residents. It is noted the site is not easily accessible even from on street parking, due to the parking restrictions close to the site, meaning there are very few alternative parking options aside from the on-site car park.
- 8.326 Site B has a separate access to Site A for deliveries and servicing, which can also accommodate a refuse vehicle. This service area, and the associated demands, are likely to be lower than for Site B, and as such there are no concerns that it cannot function safely.
- 8.327 Servicing will take place at one of the 3 loading areas within site A and one in Site B. Commercial units using this loading area will be asked to coordinate their delivery times with the onsite management company. This will ensure that only one vehicle uses the loading area at any one time and that the area is free when a vehicle arrives to use it. A final DSP would be secured by condition, in line with Policies T2 and T7F of the London Plan.

Refuse and Recycling

- 8.328 Secure, appropriately sized refuse and recycling stores are provided within each block, close to communal entrances. Refuse will be collected within the site with a refuse vehicle able to get within acceptable collection distances of all entrances. Vehicle tracking has been provided to ensure that a refuse vehicle can manoeuvre acceptably within the site.
- 8.329 To enable servicing for the station to continue within the Site, a strategy has been developed to ensure that TfL bins are accessible for refuse collection and will be undertaken by TfL. The arrangement would also be included in the DSP and secured by condition.

Cycle Parking

- 8.330 In order to encourage sustainable travel, and in line with London Plan requirements, the proposal includes 597 long stay residential cycle parking spaces to be provided within each buildings (secure and covered) with 5% of these spaces being designed for wider or adapted cycles. The short stay residential parking provision (8 spaces) would be accommodated in the landscape around the development.
- 8.331 Cycle parking for the commercial use would include 2 spaces in Block 4 and six spaces located in the landscaping around the site and in the new public realm area to the front of station.

8.332 A new cycle hub with storage for 60 bikes would also be provided at Site B and this would be available for public use. The cycle parking at the existing LU train driver's accommodation would also be provided as part of the proposed development, which is welcomed.

8.333 The location of the proposed cycle parking spaces is shown in **Figure 6** below:

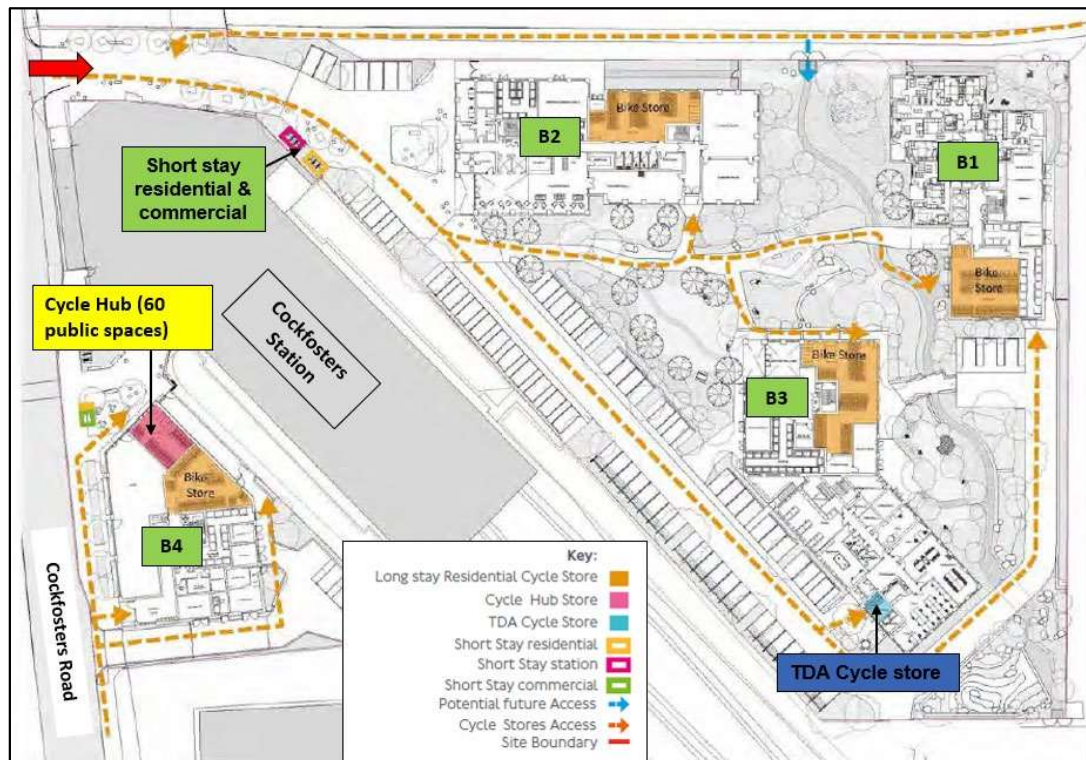


Figure 6 – Proposed cycle parking for the development

8.334 The proposed provision of cycle parking is supported and would be secured by condition.

Construction and logistics

8.335 In line with Policy T7 of the London Plan, a Draft Construction Logistics Plan (CLP) has been produced and is therefore welcomed. A detailed CLP, produced in line with TfL's latest CLP guidance (DSP), would be secured by condition.

Travel plan

8.336 A Framework Travel Plan has been included in the Transport Assessment; it is considered that the sustainable mode share targets could be more ambitious particularly as this is a Mini Holland borough. The applicant shall also commit to provide enough funding to enable the Travel Plan co-ordinator to deliver all the actions/ measures set out in the Travel Plan. The final Travel Plan would be secured by S106 agreement.

Conclusion on Transport, Access and Parking

8.337 Overall the proposed approach to access, parking and servicing is acceptable. This is subject to the mitigation measures outlined, which will be secured within a S106 Agreement, and appropriate conditions being attached to any permission granted.

Biodiversity, Trees and Landscaping

Biodiversity and Ecology

- 8.338 The site is adjacent to a SMINC and SBINC, and near to a Wildlife Corridor which runs along the Piccadilly Railway Line tracks. The site is currently of low biodiversity and ecological value, with the exception of vegetation to the periphery of the site, and an area of woodland to the north of site A which forms part of an area of designated Local Open Space.
- 8.339 Paragraph 174 of the NPPF requires planning decisions to protect and enhance sites of biodiversity value, providing net gains for biodiversity and establishing resilient ecological networks. Policy GG2 of the London Plan requires development to '*protect and enhance... designated nature conservation sites and local spaces and promote the creation of new infrastructure and urban greening, including aiming to secure net biodiversity gains where possible*'. This is echoed in Policy G6 of the London Plan which requires developments to manage impacts on biodiversity and secure a net biodiversity gain. Core Strategy Policy 36 of the Local Plan requires development to protect, enhance, restore or add to existing biodiversity including green spaces and corridors.
- 8.340 The Environment Act 2021 includes proposals to make biodiversity net gain (BNG) a mandatory requirement within the planning system in England. Developments such as the Proposed Development will, when the relevant provisions are in force, be required to achieve at least 10% gain in quantitative biodiversity relative to the site's baseline biodiversity.
- 8.341 Policy G5 of the London Plan relates to urban greening, recognising the benefits urban greening has to improved health, climate change adaptation and biodiversity conservation. The Policy sets out a minimum score of 0.4 for predominantly residential developments.
- 8.342 Policy G6 of the London Plan states that proposals that create new or improved habitats that result in positive gains for biodiversity should be considered positively. Policy G6 further states that development proposals should aim to secure net biodiversity gain.
- 8.343 At present, the site is largely dominated by hardstanding and other habitats of low ecological value. The proposal has been informed by a Phase 1 habitat survey of the site and an ecological desk study. The following potential impacts during the construction and operational phases have been identified:

- Degradation of priority woodland and other habitats within the Trent Country Park SMINC due to the close proximity of the development and increased visitor pressure;
- Disturbance to foraging and commuting bats within the adjacent Trent Country Park SMINC, particularly due to additional lighting;
- Loss of bird nesting habitat and potential damage to bird nests;
- Potential disturbance to bat roosts adjacent to the application site if present;
- Potential loss of habitat used by great crested newts if present;
- Potential loss of habitat available for common species of reptiles if present.

8.344 In order to address these impacts and avoid any residual adverse effects, the following mitigation is proposed:

- Measures to protect adjacent important ecological features including Trent Country Park SMINC and priority woodland habitat will be included in a Code of Construction Practice (CoCP) adopted throughout the construction process; and
- Measures to avoid harm or disturbance to legally protected species will be set out in a Precautionary Method of Working (PMW) document that will be included as part of the CoCP.

8.345 Proposed landscaping would replace habitats lost from the site and introduce substantial new planting and green infrastructure including tree and shrub cover as well as urban woodland, flower rich meadows, flowering and fruiting trees and shrubs and seasonally wet SUDS areas and both green and brown roofs. All planting is selected to maximise biodiversity and feature native or near native species which will help to reinforce the established nature of the adjoining SBINC and SMINC. Subject to the above mitigation measures, the proposed impact on ecology is considered to be acceptable.

8.179 The proposed development presents a well-considered approach to integrating green infrastructure and urban greening across the masterplan which is supported. The proposal has been assessed to achieve an Urban Greening Factor score of 0.42. A biodiversity net gain assessment was undertaken using Natural England's Biodiversity Metric 2.0 Calculation. The proposal is expected to result in a 447% biodiversity net gain which is far in excess of the requirements of the forthcoming Environment Bill, and also demonstrates compliance with the requirements of the NPPF (Para 170) and Policy G6 of the London Plan for development to deliver biodiversity net gain.

8.346 The Proposed Development complies with the requirements of national and local policies which require development to protect and enhance the natural environment. The extent of new planting and soft landscaping would provide a significant benefit to the local area amounting to a 447% biodiversity net gain, which is significantly more than the suggested the minimum requirements. The landscape strategy also ensures that the Proposed Development would exceed the minimum requirement for Urban Greening on-site.

Trees and Landscaping

- 8.347 Policy G7 of the London Plan requires existing trees of value to be retained, and any removal to be compensated by adequate replacement, based on the existing value of benefits.
- 8.348 Planting of new trees, especially those with large canopies, should be included within development proposals. Policy DMD 80 of the Local Plan requires that developments do not result in any loss or harm to trees of significant biodiversity or amenity value, or adequate replacement must be provided.
- 8.349 The Proposed Development would involve the removal of 17 trees, as well as a number of trees within groups, all of which are low or poor quality (Category C or U), and none are Category A or B (good or high quality) as shown in **Figure 7** below.

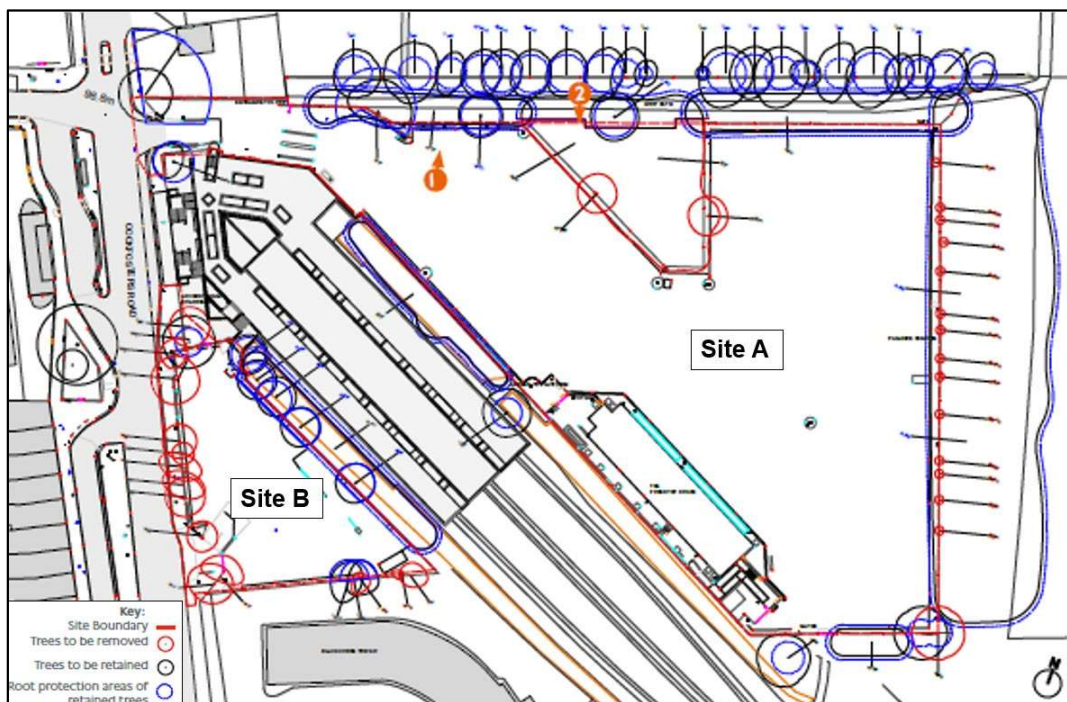


Figure 7 – Existing trees to be removed

- 8.350 A total of 93 new trees are proposed to be planted as part of the Proposed Development, as shown in **Figure 8** below, representing a net gain of 75 trees, which is welcomed. This would mean an overall increase in tree canopy cover on the site. Additionally, a large number of shrubs and other planting would contribute to greening of the site.
- 8.351 The new publicly accessible amenity spaces within the site, as shown in **Figure 8** below, amount to 4,200sqm and form part of a comprehensive landscape scheme that would provide accessible public realm that can be used by the local community. The Proposed Development would involve tree planting which more than compensates for the removal of the existing poor-quality trees in accordance with Policy DMD 71 of the Local Plan.

- 8.352 Proposed below ground utilities and drainage infrastructure has been designed to avoid Root Protection Areas to protect the integrity of retained trees. Protection measures have been outlined within the accompanying outline Arboricultural Method Statement to ensure the feasibility of retaining all identified trees.
- 8.353 The proposal is fully compliant with the Development Plan in relation to trees and there would be an overall improvement in the amount and quality of trees on the site as a result of the proposed development.

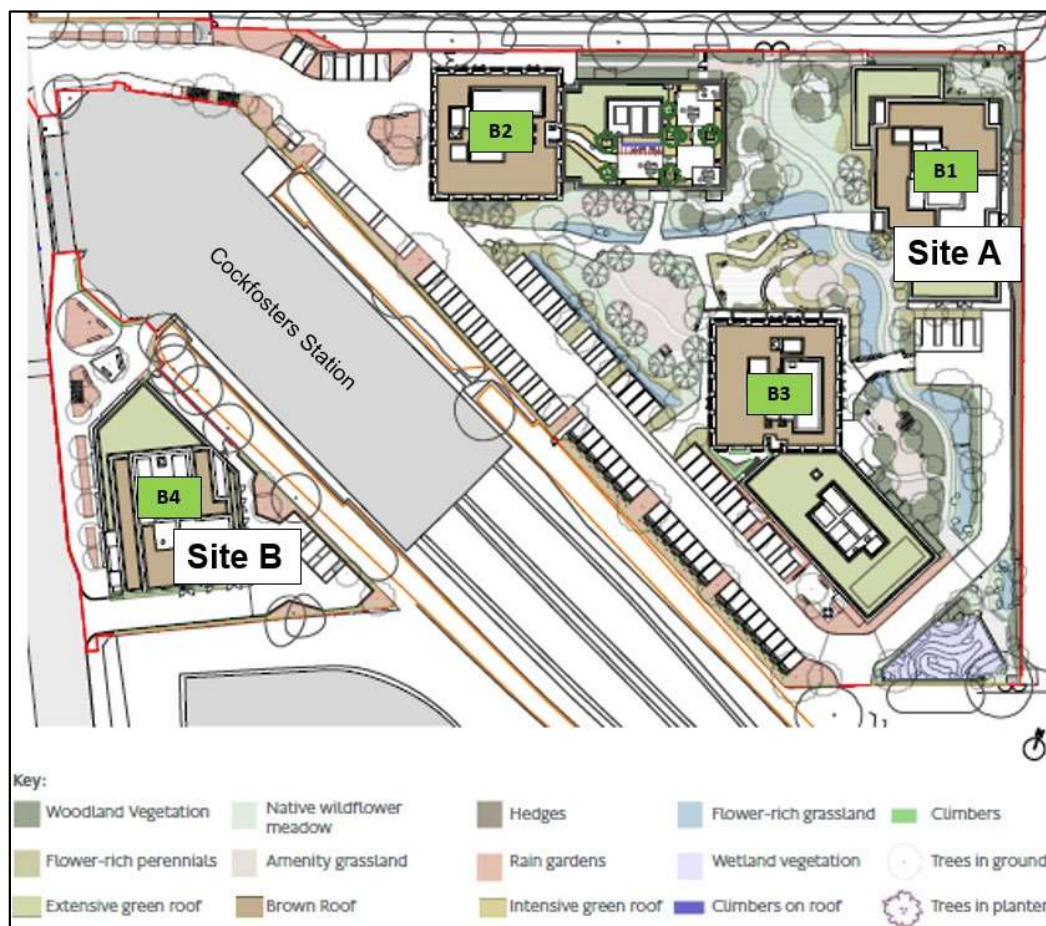


Figure 8 – Proposed tree planting

Sustainability and Climate Change

- 8.354 Paragraph 154 of the NPPF requires new developments to ‘be planned for in ways that avoid increased vulnerability to the range of impacts from climate change... and help to reduce greenhouse gas emissions, such as through its location, orientation and design’. The Council’s Cabinet declared a state of climate emergency in July 2019 and committed to making the authority carbon neutral by 2030 or sooner. The key themes of the Sustainable Enfield Action Plan relate to energy, regeneration, economy, environment, waste and health. The London Plan and Enfield (Regulation 18) Emerging Local Plan each make reference to the need for development to limit its impact on climate change, whilst adapting to the consequences of environmental changes. Furthermore, the London Plan sets out its intention to lead the way in tackling climate change by moving towards a zero-carbon city by 2050.

- 8.355 Paragraph 153 of the NPPF requires new developments to comply with local requirements for decentralised energy supply and minimise energy consumption by taking account of landform, layout, building orientation, massing and landscaping.
- 8.356 Policy SI 2 of the London Plan sets out requirements for major development from the perspective of minimising greenhouse gas emissions. For major development, the policy sets out as a starting point, that development should be zero-carbon and it requires, through a specified energy hierarchy, the required approach to justifying a scheme's performance.
- 8.357 Policy SI 2(C) of the London Plan outlines that new major development should as a minimum, achieve 35% beyond Building Regulations 2013, of which at least 10% should be achieved through energy efficiency measures for residential development. Policy DMD55 and paragraph 9.2.3 of the London Plan advocates that all available roof space should be used for solar photovoltaics.
- 8.358 Policy SI 4 of the London Plan outlines that major development proposals should demonstrate through an energy strategy how they will reduce the potential for internal overheating and reliance on air conditioning systems in accordance with a cooling hierarchy.
- 8.359 Paragraph 157 of the NPPF outlines that LPAs should expect new development to comply with any development plan policies on local requirements for decentralised energy supply unless it can be demonstrated by the applicant, having regard to the type of development involved and its design, that this is not feasible or viable.
- 8.360 Where the zero-carbon target cannot be achieved once the energy hierarchy has been followed, any shortfall should be recouped through payments to the Council's carbon off-set fund at a rate of £90/tonnes per year for a period of 30 years in line with Policy SI 2 of the London Plan.

Climate Change

- 8.361 The proposals to replace the existing car park with a car-free development of new homes aligns with the aspirations of adopted and emerging planning policy, and the Borough's commitment to becoming a carbon neutral borough by 2040.
- 8.362 The proposal would start to tackle climate change by removing the opportunity for and subsequently reducing the reliance on private motor vehicles, easing traffic and congestion as identified by Policy T2 of the Emerging Local Plan. The proposal scores highly against the Healthy Street indicators, demonstrating they would provide an overall improvement in the local environment that will encourage and help Londoners to use cars less and walk, cycle and use public transport more. This would consequently reduce the use of cars or polluting vehicles and emission of greenhouse gases (carbon dioxide, methane and nitrous oxides) which contribute to climate change.
- 8.363 The proposal would minimise the impacts of climate change, contributing to local green infrastructure through new planting, green roofs and a net gain in tree coverage which all support biodiversity and reduce the urban heat island effect.

These green networks would connect to existing ecological corridors and open spaces, particularly along the Piccadilly Line railway tracks.

- 8.364 The layout of the proposal includes passive design strategies to reduce energy consumption and proposes the use of efficient processes and appliances, energy efficient fabric, insulation and glazing, as well as efficient lights, hot water storage and mechanical ventilation with heat recovery. The proposed energy strategy, as discussed below, seeks to connect to the District Energy Network (DEN) which is an efficient system for minimising energy demand. In addition, PV panels would be installed, and energy consumption and generation will be monitored and reported with a view to reducing over time.
- 8.365 The proposal would also seek to be resilient to the severe weather and long-term climate change impacts by adapting to the consequences of environmental change through measures such as a flood risk and drainage strategy which reduces run off and accounts for rainfall events with an allowance for climate change, and a proposed site layout which includes both passive and designed measures to avoid overheating.

Energy Assessment

- 8.366 In accordance with Policy SI2 of the London Plan, the applicant has submitted an Energy Assessment that sets out how the development proposes to reduce carbon dioxide emissions in accordance with the energy hierarchy. The Assessment demonstrates how the proposal has sought to meet London Plan requirements inclusive of the energy hierarchy and relevant Council policies.
- 8.367 The proposal has followed the London Plan regulated carbon emissions reduction priority hierarchy of Be Lean (use less energy), Be Clean (supply energy efficiently), Be Green (use renewable energy) and Be Seen (monitoring).
- 8.368 Be Lean measures include efficient building fabric including highly insulated walls, floors and roofs, efficient glazing, high levels of air tightness, heat recovery systems and low energy lighting.
- 8.369 Be Clean measures are achieved by connection to the Energetik district heating network on the basis that agreement can be reached with Energetik for the supply heat to be extended to the proposal in the required timeframes. There would be a contractual agreement with the applicant to carry out detailed design and construction works to enable a connection.
- 8.370 The Oakwood Heat Network (DEN) that the proposal would connect into is currently served by an energy centre that generates heat using gas Combined Heat and Power and boilers. The network connection is proposed in accordance with the requirements of Policy SI3 of the London Plan and Policy DMD 52 of the Local Plan requiring major development to connect to existing heat networks unless there are feasibility or viability reasons not to. The Heat Network seeks to connect to the Meridian Waste Heat Network which recovers low carbon energy from industrial facilities, in the long term, presenting the opportunity for further carbon reductions in

the future.

- 8.371 In the event that a connection to the DEN is not possible, an Air Source Heat Pump (ASHP) energy strategy has also been designed for as a fall-back position which can be implemented as an alternative sustainable energy source could be provided without requiring a redesign in accordance with London Plan requirements to prioritise local energy sources.
- 8.372 In addition, the proposal would include the installation of 30sqm of solar photovoltaic panels (PV) on the area of roof not occupied by amenity space or plant or overshadowed by parapets or other buildings. Provision of PV has been maximised as far as possible in the context of the available roof space and within the parameters of the scheme's viability.
- 8.373 The Energy Assessment clearly demonstrates how the strategy follows the energy hierarchy and implements the relevant measures towards achieving zero carbon. The carbon emission reduction model demonstrates that the emission reduction from the baseline (Part L 2013) as a result of the Be Lean, Be Clean and Be Green measures will achieve 49% CO₂ savings compared to the 35% minimum required by Policy SI2 (London Plan 2021). The alternative ASHP strategy would result in savings of 54% on-site.
- 8.374 Should the future decarbonisation plans presented by Energetik to the Borough come to fruition to replace the existing source of heat with an alternative technology designed to emit less carbon per tonne of heat, this would increase to 79% CO₂ savings.
- 8.375 Following all measures towards zero carbon on site, the proposal is currently anticipated to result in a shortfall of 6,276.4 annual tonnes of CO₂ emissions over 30 years against the zero-carbon target based on the District Heating Network strategy. This shortfall would be offset through monetary payments to the Borough's carbon offset fund, which has been estimated by the applicant to be approximately £376,582. The ASHP scenario would result in a shortfall of 4,768.3 annual tonnes of CO₂ emissions over 30 years against the zero-carbon target equating to an offset payment of approximately £286,098 according to the applicant. A Final Energy Strategy, including future energy network connection to the DEN, would be secured by s106 and would identify the value of any carbon off-setting contribution payable in line with Policy SI 2 of the London Plan.

Whole Life Carbon

- 8.376 The applicant has provided a Whole Life Carbon Assessment as required by Policy SI2 of the London Plan and assessment 1 and 2 tables in line with the GLA Whole Life-Cycle Carbon Assessment guidance. Post construction monitoring is to be secured by condition.

Circular Economy

- 8.377 Policy SI7 of the London Plan requires major applications to develop Circular Economy Statements. The applicant has submitted a Circular Economy Statement in

compliance with Policy SI7. Post completion monitoring would be secured by condition.

Sustainability and Climate Change Conclusion

8.378 The proposal is a highly sustainable scheme which complies with and exceeds the requirements of the Development Plan, focusing on the use of low and zero carbon technologies and local energy sources. The energy strategy approach achieves the requirements of Policy SI 2 of the Local Plan, and the proposal supports the requirements and aspirations of local, London and national planning policies for minimising greenhouse gas emissions and the contributions of development to climate change. It also supports the Enfield Climate Action Plan 2020.

Flood Risk and Drainage

8.379 The Flood and Water Management Act 2010 (FWMA) was introduced to address the increasing risk of flooding and water scarcity, which are predicted to increase with climate change. The act sets out requirements for the management of risks in connection with flooding and coastal erosion. Whilst the Environment Agency is responsible for developing a new national flood and coastal risk management strategy Lead Local Flood Authorities (LLFA), such as the Council will have overall responsibility for development of a Local Flood Risk Management Strategy for their area and for co-ordinating relevant bodies to manage local flood risks.

8.380 Policy SI 12 of the London Plan requires developments to ensure flood risk is minimised and mitigated and that residual risk is addressed. As the site is located within Flood Zone 1 the sequential test does not apply to the development.

8.381 The Proposed Development would result in a change of use to a 'More Vulnerable' use class (Flood Risk Table 2). This is considered acceptable in Flood Zone 1, without the requirement for the Exception Test to be passed, in accordance with Flood Risk Table 3 (vulnerability and flood zone 'compatibility') set out in the Planning Practice Guidance. In addition, the site is not subject to surface water flooding.

8.382 Meanwhile Policy SI13 of the London Plan outlines that development proposals should aim to achieve greenfield runoff rates and ensure that surface water run-off is managed as close to its source as possible. It also states there should also be a preference for green over grey features, in line with an outlined drainage hierarchy.

8.383 Core Strategy Policies CP21, CP28 and CP29 and Policies DMD59 – DMD63 outline the requirements for major development from the perspective of avoiding and reducing flood-risk, the structure and requirements of Flood Risk Assessments (FRAs) and Drainage Strategies and maximising the use of Sustainable Drainage Systems (SuDS).

8.384 Flooding is not a known risk on this site. Classed as Flood Risk 1, the site is at low risk of flooding. A Flood Risk Assessment has been submitted with the application which assesses all sources of flood risk in relation to Policy SI12 of the London Plan.

This has demonstrated that the site is at a low risk of flooding from all sources with the only residual risk from surface water that is dealt with by the accompanying Drainage Strategy to ensure that the proposal would not increase flood risk to surrounding areas

- 8.385 The drainage design process has been carried out in accordance with the London Plan Drainage Hierarchy, prioritising the use of SuDS elements and discharging into natural water courses before any public sewer connections. Full infiltration is not considered to be a viable option for the drainage solution, although partial infiltration SuDS measures may be incorporated into the design.
- 8.386 A site investigation would be completed prior to the commencement of construction work to determine the potential for ground water flooding, for which mitigation measures such as the use of suitable construction techniques and basement waterproofing can be implemented to avoid any potential residual impacts should this be required. This would be secured by condition.
- 8.387 The proposal would decrease the impermeable area within the site as a result of the removal of a large proportion of the existing car parking hardstanding and replacement by areas of green roof, soft landscaping and permeable paving. Sustainable drainage systems (SuDS) and the restriction of the discharge rates to greenfield runoff rates, taking into account an allowance for climate change, ensures that the development provides betterment of the existing situation.
- 8.388 The London Plan drainage hierarchy, as required by Policy SI13 (B) requires the integration of SUDS into the landscape to provide amenity and water quality benefits. The landscape strategy includes a number of sustainable drainage measures including green and brown roofs, porous paving, swales, channels and rills, an attenuation pond, tree pits and rain gardens. These measures have been incorporated into the landscape to provide a playable space that creates interest as well as a practical solution for treating and reducing run off. As a result, surface water discharge volumes are significantly reduced and provide a significant reduction in downstream flood risk.
- 8.389 A preliminary SuDs strategy has been submitted with the application. The Council's SUDS Officer has agreed to condition the submission of a SuDS strategy to ensure that the proposed development is fully compliant with local and national policy in relation to flood risk and drainage and would provide a significant improvement to surface water quality and quantity both on and off site.

Environmental Considerations

Contamination

- 8.390 The current carpark setting matches the latest map of the area with a large proportion covered by tarmac. The submitted Phase 1 Geotechnical and Geoenvironmental Desk Study Report identifies no significant potential sources of contamination. The site is considered to represent a low environmental risk when the predominantly clay geology is considered in combination with the site history (arable

farmland and car park). This low environmental risk is corroborated by the presence of few isolated exceedances of chemical parameters. The preliminary assessment provided has identified low potential for environmental risks from sources in Made Ground and possibly groundwater to human health and the environment.

- 8.391 In accordance with the advice of the Environmental Health section, details to deal with the contamination of the site to avoid risk to health and the environment will be required by condition. Subject to the recommended conditions provided being attached requiring both compliance with submitted proposed measures and further details to be submitted in the way of a Remediation Strategy and a Verification Report, the Development is considered acceptable in terms of contaminated land and in line with relevant guidance including Paragraph 174 of the NPPF.

Air Quality / Pollution

- 8.392 The site is located within an Air Quality Management Area which is borough wide. The Council's Air Quality Action Plan identifies local cans/lorries/cars and buses and significant sources of NO₂ pollution.
- 8.393 Policy SI1 of the London Plan sets out the requirements relating to improving air quality. The policy requires that development proposals must be at least Air Quality Neutral and use design solutions to prevent or minimise increased exposure to existing air pollution. The same policy requires developments to consider how they will reduce the detrimental impact to air quality during construction and seek to reduce emissions from the demolition and construction of buildings.
- 8.394 Paragraph 105 of the NPPF recognises that development proposals which directly address transport issues and promote sustainable means of travel can have a direct positive benefit on air quality and public health by reducing congestion and emissions.
- 8.395 Policy DMD 65 of the Local Plan requires development to have no adverse impact on air quality and provide improvements where possible.
- 8.396 An Air Quality Assessment has been submitted in compliance with Policy SI1 of the London Plan. This demonstrates that future residents of the proposal would not be exposed to unacceptable levels of pollution. Furthermore, the proposed development is forecast to result in a net reduction of approximately 1,200 daily two-way vehicle movements entering and exiting the car park each day, which is expected to involve an improvement to local air quality as required by paragraph 105 of the NPPF, as well as tackling the causes of climate change by reducing the release of greenhouse gases.
- 8.397 Mitigation measures for construction dust have been identified to ensure no adverse impacts on air quality from the construction stage as required by Policy SI1 of the London Plan.
- 8.398 The proposal is expected to contribute to an overall improvement in air quality and contribute to achieving the aims of the LBE Air Quality Action Plan. It therefore

complies with the Development Plan and the NPPF in relation to air quality. A final Air Quality assessment would be secured by condition.

Archaeology

- 8.399 Paragraph 189 of the NPPF requires heritage assets to be conserved in a manner appropriate to their significance. Paragraph 194 requires applicants to describe the significance of a heritage asset sufficiently to '*understand the potential impact of the proposal on their significance*'. Policy HC1 of the London Plan requires development proposals to '*identify assets of archaeological significance and use this information to avoid harm or minimise it through design and appropriate mitigation*'.
- 8.400 The site is located within the Camlet Moated site Archaeological Priority Area which covers the scheduled medieval site and surrounding parkland. An Archaeology Assessment has been prepared which accompanies the planning application in accordance with the requirements of the NPPF.
- 8.401 The Assessment concludes that the archaeological potential for the site is low and it is unlikely that any archaeological remains survived after the construction of the Station. Historic England (GLAAS) have therefore raised no objection to the proposal and do not consider that any further assessment or conditions are necessary.
- 8.402 The proposal therefore complies with the relevant policies in relation to below ground archaeological heritage potential.

Waste

- 8.403 The environmental objective of the NPPF refers to the importance of waste management and resource efficiency. Policy SI7 of the London Plan encourages waste minimisation and waste prevention through the reuse of materials and using fewer resources. Referable applications should promote circular economy outcomes and aim to achieve net zero-waste.
- 8.404 Core Strategy Policy 22 of the Local Plan states that in all new developments, the Council will encourage the inclusion of re-used and recycled materials and encourage on-site re-use and recycling of construction, demolition and excavation waste.
- 8.405 A Site Waste Management Plan has been submitted in support of the application. This addresses the likely waste generated from the construction of the proposal and sets out a strategy to divert a minimum of 95% of construction, demolition and excavated waste from landfill which meets the requirements of Policy SI7 of the London Plan. Waste management during construction would be in line with the Mayor's waste hierarchy to minimise as much as possible the amount of waste being sent to landfill or similar disposal routes.
- 8.406 The Delivery and Servicing Management Plan accompanying the application details the operational waste requirements. This includes access arrangements for waste

vehicles and base calculations of bin numbers for waste storage. The plan includes estimates for the quantity of dedicated recycling bins required for the dwellings.

- 8.407 The proposal will seek to minimise waste generation as much as is feasible during both the construction and operational phase and use sustainable construction and waste disposal methods as much as possible in accordance with the Development Plan. A final Delivery and Servicing Management Plan would be secured by condition in accordance with Policies T2 and T7F of the London Plan.

Wind Microclimate

- 8.408 Policy D9 of the London Plan requires developments to consider the wind and microclimatic conditions around proposed buildings and ensure that they are carefully designed so that they don't compromise the comfort and enjoyment of the surrounding open space. Air movement affected by developments should support the effective dispersion of pollutants, but not adversely affect street-level conditions.
- 8.409 Policy D3 and Policy D8 of the London Plan also reference wind and microclimate conditions and re-emphasise the importance of considering these factors.
- 8.410 A Wind Microclimate assessment comprising an experience-based desk study has been submitted with the application to inform the design development and guide principles such as the positioning of buildings, doorways and landscape features to ensure the proposal would provide a comfortable environment. The proposal is not expected to materially affect existing local conditions around the site. Within the site, changes to microclimate conditions as a result of the development are expected to be appropriate for the proposed use and for play, sitting and recreational activities.
- 8.411 The proposal would not therefore cause any harm to the amenity of the area in respect of wind and microclimate in accordance with the London Plan).

Socio-Economics and Health

Socio-Economics

- 8.412 Policy CG5 of the London Plan seeks to ensure that the benefits of economic success are shared more equally across London and Policy E11 makes clear that development should support employment, skills development, apprenticeships and other education and training opportunities in both the construction and end use phases.
- 8.413 Core Strategy Policy 13 of the Local Plan seeks to protect Enfield's employment offer and Core Policy 16 requires mitigation to help local people improve skills and access jobs. The Council's Planning Obligations SPD (2016) sets out guidance on implementing these policies.
- 8.414 To help ensure that Enfield residents are able to take advantage of this beneficial effect of the scheme, it is recommended that s106 planning obligations be attached to any permission granted securing the following:

- Local Labour (during demolition and construction phases):
 - Employment & Skills Strategy submitted and approved prior to commencement;
 - All reasonable endeavours to secure 25% of workforce;
 - Apprenticeships or trainees; and
 - Local goods and materials.
- Employment & training:
 - Employment and Skills Strategy to establish requirements for local resident engagement in employment opportunities, recruitment of apprentices, quarterly reporting and targets;
 - Training opportunities; and
 - Partnership working with local providers/programmes.

Health

- 8.415 The NCAAP (2014) states that NC Policy 5 'Provision of Modern Healthcare Facilities' states that development of 10 residential units or more will be expected to contribute towards the provision of health facilities within the NCAAP area, and financial contributions will be calculated using the NHS Healthy Urban Development Unit Model.
- 8.416 Based on the 2011 Census, the ward population for Cockfosters within the London Borough of Enfield Authority, was recorded as 13,788 with the number of households 5,215. Within that ward population the economically active (age 16-64 in full time work, part time work, self-employed, full time students or unemployed) is 72.9%, which is slightly lower than the England and Wales average of 76.8%.
- 8.417 The Proposed Development will result in the provision of housing, additional local spending by residents of the new development, and the provision of public and private amenity space and open space.
- 8.418 As the Development will provide good quality housing, a small level of employment opportunities by way of the re-provided Train Drivers accommodation and flexible retail unit in Blocks 3 and 4 and access to amenity areas, potential positive effects on health are anticipated in regard to access to open space, crime reduction and community safety.
- 8.419 Taking the above into consideration, overall it is considered that some positive environmental effects on socio-economics would arise as a result of the development. Furthermore, it is not considered there would be any significant effects on health occurring as a result of the development. Officers have secured a financial contribution of £179,800 to contribute towards the provision of health facilities within the area.

Education

- 8.420 Policy S3 of the London Plan seeks to ensure there is a sufficient supply of good quality education and childcare facilities to meet demand and notes that needs should be assessed locally and sub-regionally.
- 8.421 Meanwhile Core Policy 8 of the London Plan sets out that the Council will contribute to improving the health, lives and prospects of children and young people by supporting and encouraging provision of appropriate public and private sector pre-school, school and community learning facilities to meet projected demand across the Borough.
- 8.422 The Council's Section 106 Supplementary Planning Document (SPD) sets out that LBE will seek financial contributions for education at a rate of £2,535 per dwelling regardless of unit size. However, in the context of education contributions, the amount of mitigation requested should not exceed the cost of meeting the likely education demand from the development; and should be necessary to do so. If there is existing surplus capacity in education facilities that could meet this need without additional capital costs being required, education obligations are not justified in terms of tests set by Regulation 122.
- 8.423 Child yield: The total population and number of children expected to live in the Proposed Development has been calculated using the GLA Population Yield Calculator (v3.2 October 2019). For the purposes of the application the applicants have manually adjusted the age brackets to align with primary and secondary educational years.
- 8.424 For the Proposed Development a PTAL rating of 3 and 4 is assumed (the site is located within PTAL 3 and 4). The projected gross child yield is set out in the **Table 16** below:

	Projected number of people
Total population yield	626
Total child yield (under 16 years)	49
Children under 4	23
Children of primary school age (age 4-10)	20
Children of Secondary school age (age 11-15)	6
Children of sixth form age (16-17)	3

Table 16 – Projected child yield arising from the Development
*Figures do not sum due to rounding

- 8.425 The submitted information indicates the Development Child Yield will be 20 primary school age children and 6 secondary school age children.
- 8.426 Using the GLA Population Yield Calculator (with the applicant adjustments as mentioned above), the estimated population number generated by the Proposed Development is 626. Of this number, it is expected that there will be 49 children under 16 years of age made up of 20 children of primary school age (4-10), 6

children of secondary school age (11-15) and 3 children under the age 4 of which a proportion may need local childcare.

- 8.427 It is noted that these projections are gross population yields and that some families may already live in the area and may already have a place at a local school. Additionally, not all children under 4 would be expected to need a place in an early years setting, and it would also be expected that most children who do, will take a part-time place. Based on the assumption that of those places that are part time, only part of the week or part of each day which will be utilised, it is assumed that one physical place in an early years setting can provide a part time place for more than one child.
- 8.428 Primary School: Officers have undertaken a detailed assessment of the potential child population, primary and secondary school surplus, latest forecasting information on school places in the context of Regulation 122 (Community Infrastructure Levy Regulations) tests. Regulation 122 sets out limitations on the use of planning obligations with which the planning authority must comply. It states: (1) This regulation applies where a relevant determination is made which results in planning permission being granted for development; (2) A planning obligation may only constitute a reason for granting planning permission for the development if the obligation is: necessary to make the development acceptable in planning terms; directly related to the development; and fairly and reasonably related in scale and kind to the development.
- 8.429 The scheme is estimated to house an estimated 20 primary school age children. There is evidence, in respect of this specific site and the appropriate catchment, of sufficient primary places (the current combined surplus capacity at the primary schools within 1km of the site is approximately 5% (61 places). Whilst it is standard practice to maintain a surplus capacity of 5% in schools to accommodate mid-year admissions and facilitate parental choice, an estimated 5% surplus indicates that there is likely to be capacity within local primary schools.
- 8.430 In the context of education contributions, this means that the amount of mitigation requested should not exceed the cost of meeting the likely education demand from the development; and should be necessary to do so. If there is existing surplus capacity in education facilities that could meet this need without additional capital costs being required, this means that education obligations would not be justified under the terms of Regulation 122.
- 8.431 The Infrastructure Planning team has confirmed that the evidence presented, including the modest child population likely, that it would not be proportionate, reasonable or necessary to request an education contribution in this specific case, on this specific site.
- 8.432 Secondary School: The scheme is estimated to house an estimated 6 secondary school age children. There is evidence, in respect of this specific site and the appropriate catchment, of sufficient secondary places (the current combined surplus capacity at the secondary schools within 1km of the site is approximately 7%. Whilst it is standard practice to maintain a surplus capacity of 5% in schools to

accommodate mid-year admissions and facilitate parental choice, an estimated 7% surplus indicates that there is likely to be capacity within local secondary schools.

- 8.433 On the basis of the above information, and in the context of Regulation 122 the proposal is considered to align with relevant policy guidance including Core Policy 8 of the Local Plan; and Policy S3 of the London Plan and would not be considered give rise to an unmanageable or unacceptable scenario in terms of education provision to existing or future residents.

9 Equality Duty and Human Rights

- 9.1 In line with the Public Sector Equality Duty the council must have due regard to the need to eliminate discrimination and advance equality of opportunity, as set out in section 149 of the Equality Act 2010. Section 149 of the Act requires public authorities to have due regard to several equality considerations when exercising their functions including decision making on planning applications. These considerations include: Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act; Advance equality of opportunity between persons who share a relevant protected characteristic (explained in detail below) and persons who do not share it; Foster good relations between persons who share a relevant protected characteristic and persons who do not share it. The main objective of the duty has been to ensure public policies and programmes are implemented fairly, in particular with regard to their impact on the protected characteristics identified above.
- 9.2 In assessing the scheme, due regard has been given to the Public Sector Equality Duty and relevant protected characteristics. The LPA's comprehensive assessment has given due consideration to concerns and objections received, including the applicant's Equalities Statement (June 2021). The Equality Act 2010 places the Local Planning Authority under a legal duty to have due regard to the advancement of equality in the exercise of its powers, including planning powers.
- 9.3 Officers are satisfied that they have had due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it. This requirement includes removing or minimising disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic and taking steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it. The Act defines protected characteristics, which includes age, disability, gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; and sexual orientation.
- 9.4 Policy GG1 of the London Plan highlights the diverse nature of London's population and underscore the importance of building inclusive communities to guarantee equal opportunities for all, through removing barriers to, and protecting and enhancing, facilities that meet the needs to specific groups and communities. Core Strategy Policy 9 of the Local Plan explicitly supports the tackling of social disadvantage and promoting accessibility to good quality health care, housing, education and training, employment, open space and other social facilities; Core Strategy Policy 16 seeks to

tackle inequality through the enhancement of employment opportunities and the underlying work that ensures residents can take full advantage of those opportunities.

9.5 The application is supported by an Equalities Statement. As required by the Public Sector Equality Duty (PSED) and in recognition of the relevant legal judgements, the Equalities Statement provides a summary of the potential impacts of the proposals which the Council should consider when discharging its PSED under Section 149 of the Equality Act 2010. It identifies Protected Characteristics and how they might be impacted by different stages of the development project and then sets out an Action Plan which identifies how any negative impacts would be addressed by the scheme. This includes provision of Blue Badge parking, development of a parking strategy, managing construction traffic through appropriate management plans, and also the many benefits the scheme will bring including the provision of affordable and accessible housing, improved public realm, economic growth and training, increasing site surveillance and an overall reduction in traffic.

- 9.6 Concern has been raised by some objectors that the proposal would provide a lack of accessible car parking space thereby negatively impacting disabled people both in Enfield and in areas of Barnet where people are likely to use the station.
- 9.7 According to the surveys undertaken, around 8% of car park users considered themselves as having a disability, and the same proportion were Blue Badge holders. Around 6% of users are aged 65+, and there is a significant overlap between elderly users and those with disability; 58% of those aged 65+ were also Blue Badge holders. In total, 10.5% of users were disabled and/or aged 65+.
- 9.8 The existing car park has twelve Blue Badge spaces. At no point during the occupation survey were all twelve spaces occupied all at once, and the scheme is re-providing all twelve spaces. These are to be relocated to immediately outside the step-free station entrance, as set out in the Car Parking Design and Management Plan.
- 9.9 The survey also identified site users with disabilities – including people with mobility impairment and wheelchair users – who were not Blue Badge holders, as well as elderly users (aged 65+) without a Blue Badge. This was also identified as a concern in the public consultation.
- 9.10 Considering these are not eligible to park at the Blue Badge spaces, people with such protected characteristics could be differentially impacted in terms of mobility and accessibility. Such differential effects could also impact upon people who are pregnant or accompanied by young children due to reduced mobility.
- 9.11 The design of the Proposed Development started as a car-free scheme, removing all car parking except for the re-provision of the Blue Badge spaces. Following the above identified concerns, the scheme was redesigned with those equality considerations in mind. The scheme will now provide, in addition to the twelve reprovided Blue Badge spaces; 35 general use spaces for the public; Seven drop-off/pick-up spaces; and one car club bay.

- 9.12 The National Transport survey (2020)¹⁷, for example, shows that people aged 60+ are more likely than other age groups (except children and young people aged under 20) to be a passenger in a car as a mode of transport. This was true also for people with mobility difficulties, where 28% of journeys were as a passenger (compared to 13% for people without a mobility difficulty), suggesting the drop-off spaces could be particularly beneficial for older people and people with mobility impairments. Furthermore, TfL and the Council provide support and services to assist those with barriers to mobility, such as Dial a Ride.
- 9.13 In general, the TA survey also found that most car park users have alternatives available to them - 95% of car park users surveyed had a closer underground, overground or National Rail Station to their home than Cockfosters underground station and 18% of users lived within 640m of a bus stop which serves Cockfosters Station. Only 2.6% of those surveyed started their journey inside the M25 and more than 960m from a station or 640m from a bus stop which serves Cockfosters Station. There are also four bus routes that serve the station. The evidence demonstrates that viable public transport alternatives are available for existing car park users to reach their destination.
- 9.14 TfL provides the following transport accessibility services:
- Step free station access
 - Accessible journey planning and travel mentoring
 - Assisted transport services, including: Taxi card (for use of taxis and minicabs)
 - Community transport (to access work, training and social activities); Dial-a-Ride (a door-to-door service), and transport to hospital appointments.
- 9.15 It was noted during consultation with Christ Church Cockfosters that worshippers occasionally use the station car park on Sundays and on events such as weddings and funerals, however it is not known how many users this refers to. As set out previously, the changes to the scheme mean that 35 car parking spaces will be retained for public use (as well as 12 Blue Badge Spaces) which would be available for use by those accessing the church on Sundays and events if required in addition to parking at the Church and on-street.
- 9.16 Overall, the majority of the effects of the Proposed Development have been identified as likely to be beneficial or neutral. No significant adverse effects are considered likely. Equality impacts should be considered in the balance, alongside the benefits arising from the Proposed Development.
- 9.17 In line with the Human Rights Act 1998, it is unlawful for a public authority to act in a way which is incompatible with a Convention right, as per the European Convention on Human Rights. The human rights impact has been considered, with particular reference to Article 1 of the First Protocol (Protection of property), Article 8 (Right to respect for private and family life) and Article 14 (Prohibition of discrimination) of the Convention.
- 9.18 The Human Rights Act 1998 does not impair the right of the state to make decisions and enforce laws as deemed necessary in the public interest. The recommendation is

considered appropriate in upholding the council's adopted and emerging policies and is not outweighed by any engaged rights.

10 Community Infrastructure Levy

- 10.1 Both Enfield CIL and the Mayor of London CIL2 would be payable on this scheme to support the development of appropriate infrastructure. A formal determination of the CIL liability would be made when a Liability Notice is issued should this application be approved. Based on the Mayor and Council's Charging Schedules, the total level of CIL is expected to be in the order of £4m (based on current details, certain scheme assumptions, indexation assumptions and inclusion of relief).

11 Conclusion

- 11.1 The proposed development will bring forward the regeneration of the site and is aligned with the Council's desire for growth within the Cockfosters area. The proposed redevelopment of the car parks at Cockfosters Underground Station has been developed in the context of the relevant local, London and national planning policy. The proposed site is a brownfield site in a highly sustainable location at Cockfosters Underground Station. As a previously developed site which is currently underutilised, the Proposed Development for housing is fully supported by policies for boosting the supply of homes (NPPF and policies GG2 and H1 of the London Plan).
- 11.2 There is a pressing need for housing, including affordable housing, and the Council has an extremely challenging 10-year housing delivery target. The Council is currently failing the Government's Housing Delivery Test and the 'presumption in favour of sustainable development' and 'tilted balance' applies. The proposal would provide 351 residential units of which 132 would be affordable units (which is 38% of units or 40% by habitable room) which will make a significant contribution to housing supply and contribute to meeting the housing needs of the Borough. The proposal has been viability tested and the 40% offer made is considered the maximum reasonable proportion of affordable housing that the scheme can currently provide.
- 11.3 The application has been advertised as a departure from policy on the basis that it is not in accordance with policies DMD 43 (tall buildings) and DMD 44 (heritage) of the Local Plan and policy G4 of the London Plan.
- 11.4 With regard to the contravention of policy DMD 44, the proposal has been identified as causing 'less than substantial' harm. Both the GLA and Historic England have also come to the same conclusion as to the level of harm. However, it is important to identify the public benefits that would outweigh these in line with paragraph 202 of the NPPF. These benefits are considered to be:
- Heritage - enhancements to Trent Park, Cockfosters Road and Cockfosters Station;
 - New Homes - delivery of 351 new housing, including 132 affordable housing units (40% by habitable room or 38% based on units);
 - Increasing and improving open space provision – the existing 815sqm of currently inaccessible designated Local Open Space would be replaced with a new publicly

accessible amenity spaces within the site amounting to 4,200sqm and forming part of a comprehensive landscape scheme with significant tree planting that would provide accessible public realm that can be used by the local community; and

- Improving and Enhancing Public Realm - enhancements to public realm and way finding, including through provision of 4,200sqm of high quality, permeable public realm.

- 11.5 With regard to the identified social, economic, environmental and sustainability value that the scheme would bring, with the addition of the benefits identified above, it is considered that the public benefits of the application scheme outweigh the 'less than substantial' harm identified.
- 11.6 With regard to policy DMD 43, the height and massing of the development has been assessed in relation to its impact from a wide range of viewpoints and has been found to be acceptable and justified. The height of the development in this highly publicly accessible transport location is considered to be acceptable. The proposed building on the site has been sensitively designed, taking inspiration from the surroundings and historic context of the site, and would respect the character, context and the form and scale of neighbouring buildings and would sit comfortably within the streetscene and surrounding area. The appearance, materials, detailed façade treatment, landscape and public realm design of the development is considered to be high quality, displaying an appropriate response to the surrounding character. There are some outstanding design issues that have been raised by the Council's design officers, however in the overall assessment it is considered that the aspects of the scheme design that raise concern can either be justified or suitably addressed by condition. The policy therefore accords with policy G9. While the policy would contravene policy DMD 43, the proposal would accord in overall terms with the policy D9 of the London Plan.
- 11.7 In relation to policy G4 of the London Plan, whilst the proposal would result in the loss of the existing protected open space contrary to part B, 1) of the policy, the existing 815sqm of designated Local Open Space is currently inaccessible to the public. The proposal would reprovide this space with a significant uplift in Local Open Space with 4,200sqm of publicly accessible space being provided within the site, in line with part B, 2) of policy G2, that would include a comprehensive landscape scheme with significant tree planting that would provide accessible public realm that can be used by the local community.
- 11.8 Given the distance and orientation to the nearest residential properties, and the inclusion of appropriate mitigation measures, the proposal would not result in any significant material impact in terms of overlooking.
- 11.9 The proposed development would meet all relevant residential space standards and the provision for private and communal amenity space and playspace proposed is considered to be acceptable. Adequate levels of daylight would also be provided within the flats for future residents. The proposal provides units with a good standard of accommodation, in terms of unit sizes, aspect and amenity space provision, being provided.

- 11.10 The development would have a sustainable construction, meeting all of the relevant sustainability standards. The car free development, and provision of a new public square, will vastly improve permeability throughout the site, in stark contrast to the existing situation. It will also result in a shift away from the private car and encourage active travel and the use of public transport in line with the Mayor's Transport Strategy for Healthy Streets.
- 11.11 The likely impact of the reduction in public car parking spaces (non-blue badge) and the merits of encouraging sustainable travel options have been fully assessed. This includes considering the impact and mitigation of potential dispersal / displacement based on data of: alternative options available to existing car park users (based on Officer analysis of objections received / postcodes provided and survey information submitted in support of the application) and the local proximity of underground and national rail stations in this area of Enfield (most homes are within walking distance (960m or c.1/2 mile) of an underground or national rail station). A reduction in cars travelling to park at the site, because of the proposed development, would reduce air pollution and noise disturbance locally.
- 11.12 The proposed scheme does result in some adverse and noticeable reductions in daylight and sunlight as identified. However, consideration should be given to the particular characteristics of the properties reviewed and to the fairly minimal existing massing on the application site which is unusual in an urban context. It is also reasonable to consider the identified effects alongside the planning merits of the scheme overall. In conclusion, having given considerable importance and weight to the issue, officers consider that the overall impact of the scheme in terms of daylight, sunlight and overshadowing will result in amenity being preserved and that there is compliance with Policy DMD 8.
- 11.13 Under Section 38(6) of the Planning and Compulsory Purchase Act 2004, a proposal should be made in accordance with the development plan unless material considerations indicate otherwise. Officers consider that, although there would be non-compliance with policies DMD 43 and DMD 44 of the Enfield Local Plan: Development Management Document (2014) (tall buildings and heritage) and policy G4 of the London Plan (March 2021), the proposal is considered to accord with policy in all other respects, including the land uses proposed, transport impacts, sustainability, landscaping and urban greening. Overall, therefore, it is concluded that the proposal is in accordance with the development plan. Material considerations which would not warrant refusal; for example, the heritage harm caused by the proposal is outweighed by the public benefits of the scheme.
- 11.14 Officers have also considered the position if it is concluded that because of the contravention of some of the policies of the development plan the scheme is not in accordance with the development plan. Officers have taken into account the benefits of the scheme and weighed these against the impacts of the proposals, including amenity. The tilted balance in paragraph 11 of the NPPF would apply in this case as a result of the shortfall in housing delivery and because the harm to heritage assets does not provide a clear reason for refusing the proposed development (when also taking into account the presumption against harm). As a result, the NPPF policy is

that planning permission should be granted unless any adverse impacts would significantly and demonstrably outweigh the benefits when assessed against the policies in the NPPF taken as a whole. Given the benefits of the scheme, it is concluded that material considerations would justify non-compliance with the development plan.

- 11.15 The proposed development is an application of potential strategic importance to London and as such is referable to the Mayor of London pursuant to the Town and Country Planning (Mayor of London) Order 2008. The GLA has issued its Stage 1 consultation response, and the officer recommendation contained in this report acknowledges the need to refer the application to the Mayor for his final decision (Stage 2 referral).

CGI's









4.5.2 Views

Note
Replacement for DAS page I28.

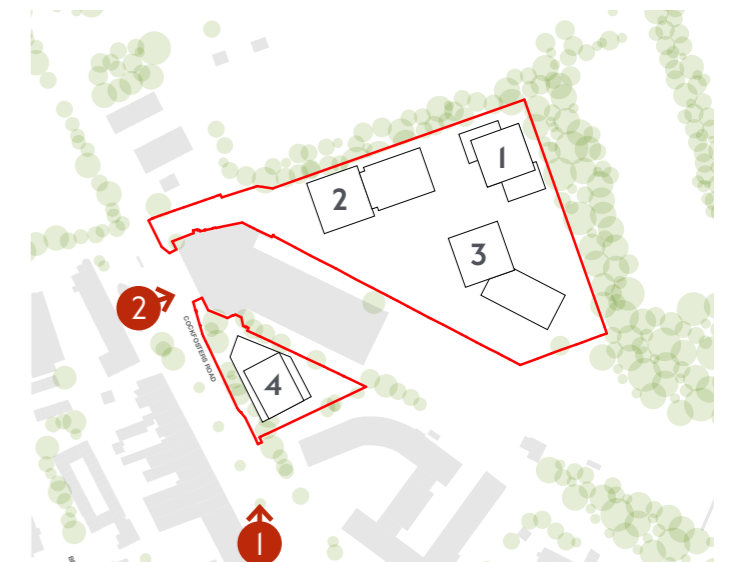


1 View from Cockfosters Road/Mount Pleasant (Verified View G)
(Note view includes massing for BHT extension with resolution to grant planning permission)



2 View from Cockfosters Road (Verified View H)

Note
The colour and specification of the external facing materials will be secured by planning condition and would be developed in line with Section 4 (Materials) of the Design and Access Statement



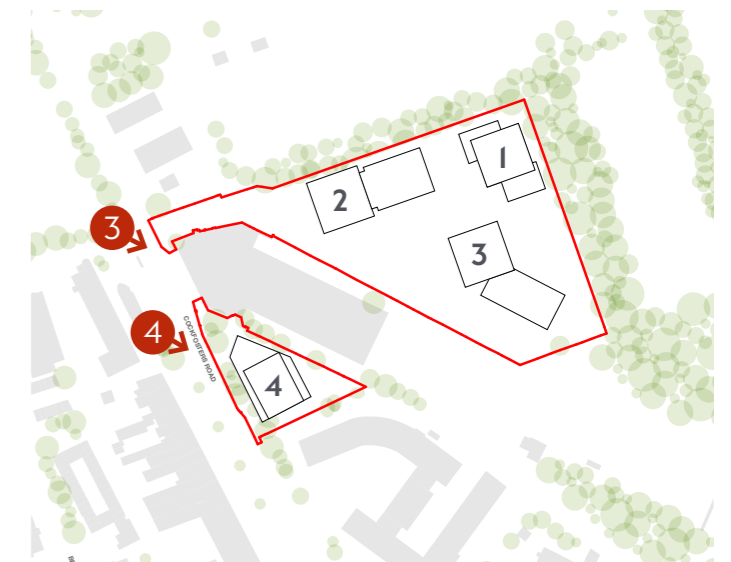
4.5.2 Views



3 View from Cockfosters Road (Verified View 1)



4 Cockfosters Road looking south



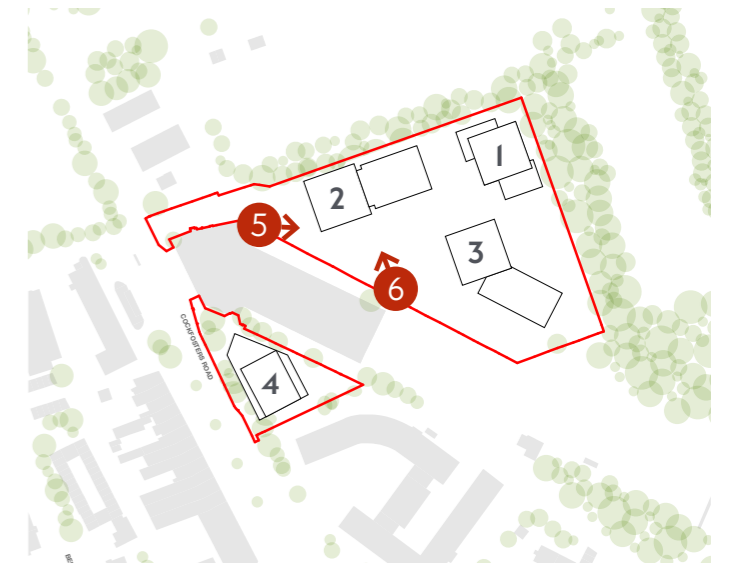
4.5.2 Views



5 Entry View- LOOP Place, Site A



6 The Orchard and Block 2



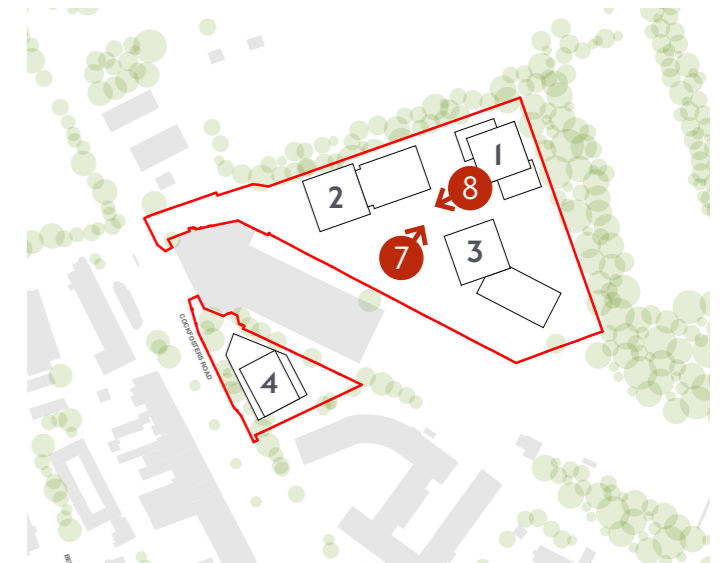
4.5.2 Views



7 The Pavilion, Site A



8 Central Place Landscape, Site A



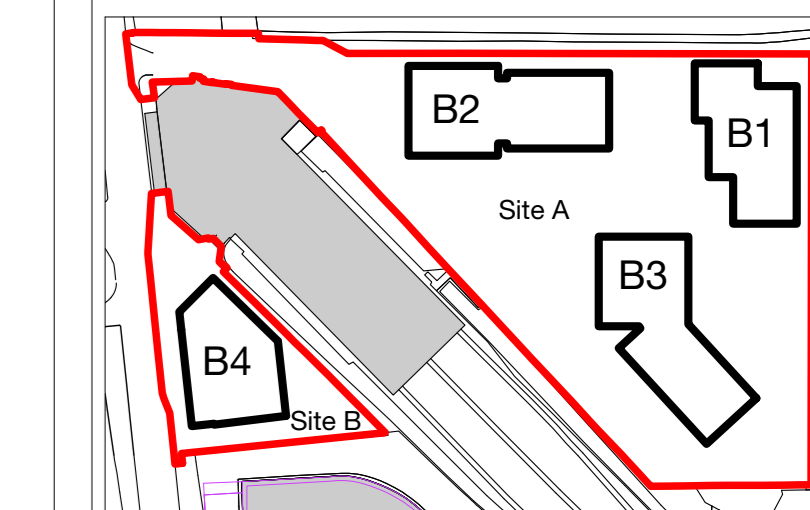
Site Wide Plans



1 Ground Floor GA Plan
1 : 200

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Rev	Description	Date
P01	Planning Submission	June 2021
P02	Scheme Update	October 2021



- Thames Water Easement Zone between the blue lines
- BHT Extension with Resolution to grant Planning Permission
- 1B2P
- 2B4P
- 3B5P
- Amenity and Entrance Lobby
- CLL Ancillary Space
- Bike Store
- Bins
- Cycle Hub
- Retail
- Plant
- LUL Staff and TDA WC
- LUL Staff and TDA Plant
- LUL Staff and TDA Cleaner's Room/Store
- LUL Staff and TDA Offices
- LUL Staff and TDA Kitchen
- + xx.xx Proposed AOD Levels
- Main entrances
- Existing Trees
- Proposed Trees

North

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Project
Cockfosters Station Car Parks
Enfield

Drawing
Ground Floor GA Plan

Scale @ A0
As indicated

Date
October 2021

Drawn By
PQC

Checked By
JC

Job Number
190072

Status
S2

Purpose of Issue
For Approval

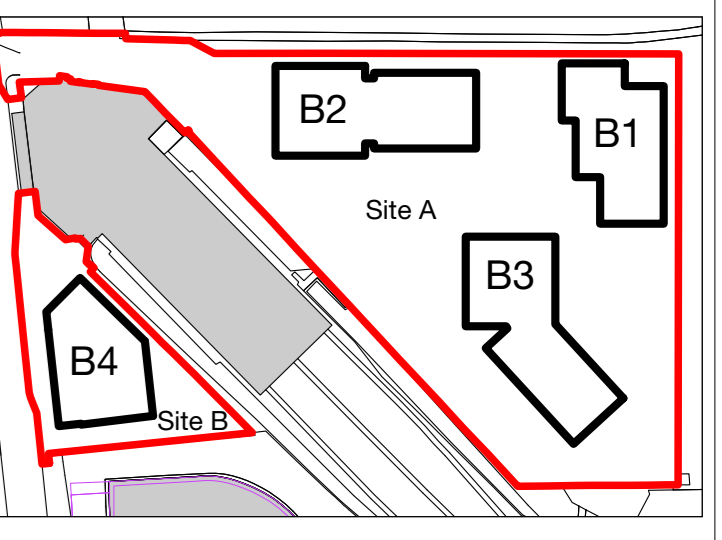
Drawing No.
CFCP-HBA-00-00-DR-A-08-0121

Rev
P02



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Rev	Description	Date
PD1	Planning Submission	June 2021
PD2	Scheme Update	October 2021



- Blackhorse Tower Extension with Resolution to grant Planning Permission
- 1B2P
- 2B3P
- 2B4P
- 3B4P
- 3B5P
- Guest Suite x1 (Block 2)



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JONATHAN COOK LANDSCAPE ARCHITECTS

Project
 Cockfosters Station Car Parks
 Enfield

Drawing
 First Floor GA Plan

Scale @ A0
 As indicated

Date
 October 2021

Drawn By
 PQ

Checked By
 JC

Job Number
 190072

Status
 S2

Purpose of Issue
 For Approval

1 First Floor GA Plan
 1 : 200



Landscape & Play Space

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 To be read in conjunction with all relevant Architects', Services and Structural Engineers' drawings.
 All existing site, tree and building information has been compiled from different sources.
 Refer to current revisions of all referenced files.

Notes:
 - Refer to Architects' information for all building information.
 - Refer to Arboricultural report & Existing Landscape plan CF116.3.P.00.ELP
 - Refer to CF116.3.P.06.TP for proposed trees
 - Seating and benches are shown for illustrative purposes only. Seating areas will include areas suitable for outdoor seating and waiting areas, as set out in the Microclimate Report.

Key:
 - Site boundary line
 - Existing tree to be retained
 - Root protection area
 - Proposed landscape levels
 - Planting, Refer to CF116.3.DP02.PP, CF116.3.P.06.TP and CF116.3.P.13.PPG

Proposed trees and shrubs
 - Planting - Meadow/grasses
 - Planting - Taller planting
 - Planting - Lawn
 - Vegetated Swale

Features, Refer to CF116.3.DP01.MP
 - Timber stepping stones/timber surface
 - Timber & Concrete stepping elements
 - Bespoke Timber Pergola with climbers
 - Play elements, refer to CF116.3.P.08.PA
 - Boulders
 - Retaining walls
 - Benches

Surfacing, Refer to CF116.3.DP01.MP and CF116.3.P.04.SP
 - Compacted footpath gravel
 - Exposed aggregate concrete paver type 1
 - Exposed aggregate concrete paver type 2
 - Concrete paver type 3 & 4
 - Bark mulch
 - In-situ brushed concrete
 - Exposed aggregate tarmac
 - Potential to use grasscrete for standard bays
 - Wetpour rubber surface
 - In-situ brushed concrete with bespoke lettering

Rev	Date	Description
P1	24.05.21	Planning issue
P2	09.10.21	Planning update
P3	06.01.22	Planning update

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Client
 Connected Living London
 CLL

Project
 Cockfosters Station Carparks
 CF116

Drawing Title
 Overview Groundfloor Landscape Plan

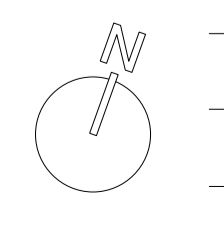
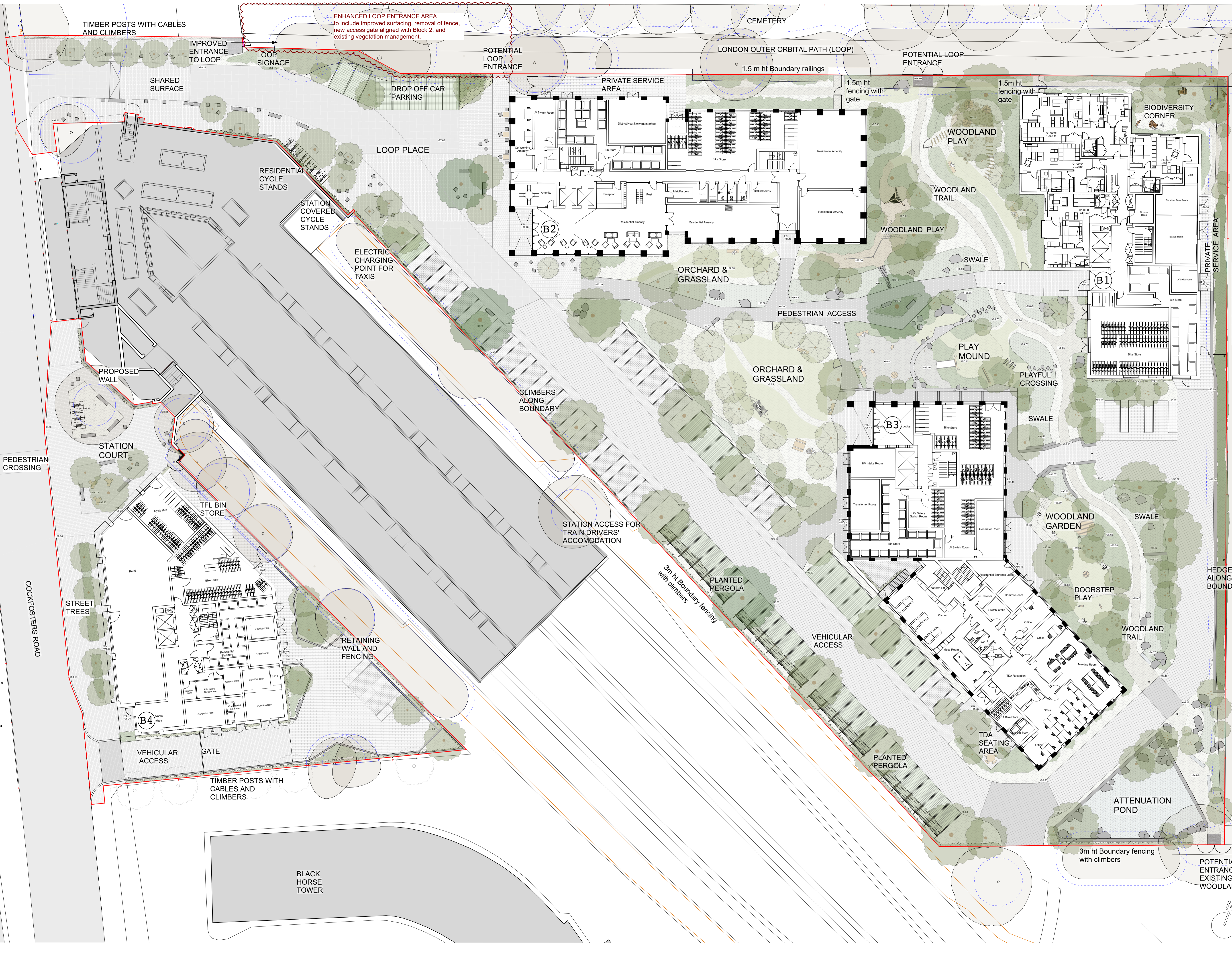
Drawing Status
 Illustrative

Date
 06.01.2022

Scale
 1:250 @ A1

Drawing Number
 CF116.3.P.01.LP

Revision
 P3





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To be read in conjunction with all relevant Architects', Services and Structural Engineers' drawings.

All existing site, tree and building information has been compiled from different sources.

Refer to current revisions of all referenced files.

- Notes:
- Refer to Architects' information for all building information.
 - Refer to CF116.3.P.14.PPR for roof planting plan
 - Refer to CF116.3.P.03.RTP for accessible roof terrace
 - Seating and benches are shown for illustrative purposes only. Seating areas will include areas suitable for outdoor seating and waiting areas, as set out in the Microclimate Report.

- Key:
- B1** Block number
 - Brown Roof
 - Extensive Green Roof
 - Decking area/ special surface at viewpoint TBC
 - Hard paving
 - Low level planting
 - Raised planter
 - Timber pergola with climbers
 - Small tree/shrub, multistem
 - Furniture
 - Fence/balustrade

Rev	Date	Description
P1	24.05.21	Planning issue
P2	08.10.21	Planning update

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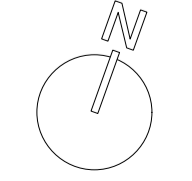
Project
**Cockfosters Station Carparks
 CF116**

Drawing Title
Roof plan

Drawing Status
Illustrative

Date 08.10.2021 Scale 1:250 @ A1

Drawing Number **CF116.3.P.02.RP** Revision **P2**



2.1 Illustrative Landscape Plan

The plan shows an illustrative proposal for the ground floor landscape in response to LBE officers' comments, incorporating the following additional illustrative information:

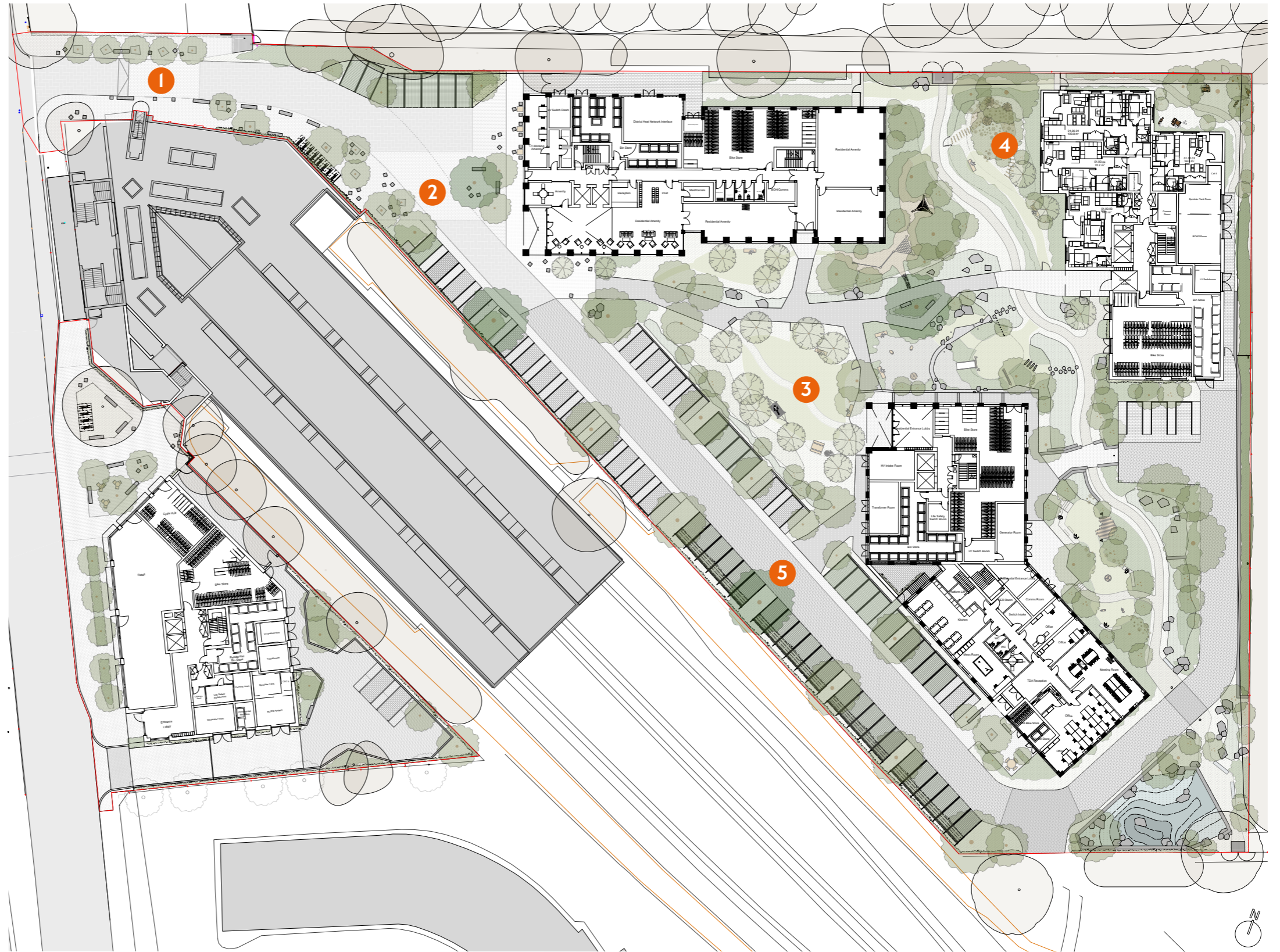
More detail has been added to show indicative delineation between public and communal amenity areas. Refer to the DAS Addendum.

The entrance to site A and LOOP Place has been revised to further strengthen pedestrian routes through the space, while retaining the drop-off bays.

More tree planting is provided within the parking area, to create further breaks between the parking bays.

For the avoidance of doubt, the vehicular access will remain as proposed. All vehicles, including cars and delivery and servicing vehicles can enter and leave the site in forward gear.





- 1 Pedestrian crossing to LOOP Path entrance.
- 2 Pedestrian crossing to Block 2 and central landscape.
- 3 Communal amenity area. Soft landscape forming the boundary, e.g. combination of meadow/tall grassland vegetation and soft fruit hedge, tying in with orchard character. Potential for timber gates.
- 4 Communal amenity area. Soft landscape forming the boundary, planting to tie in with woodland/meadow character. Potential for timber gates.
- 5 Further tree planting is proposed within the parking area.

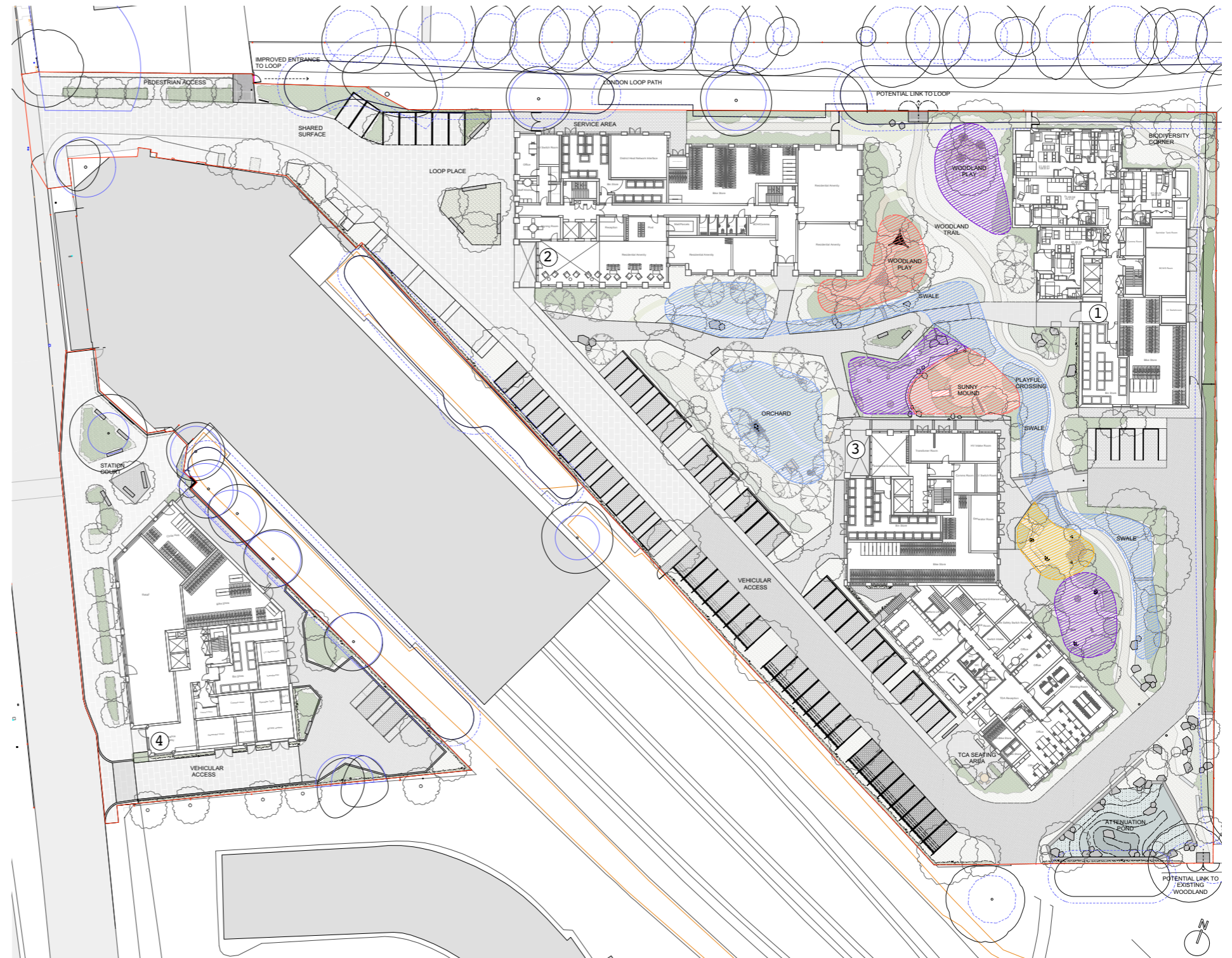


Proposed Play Strategy

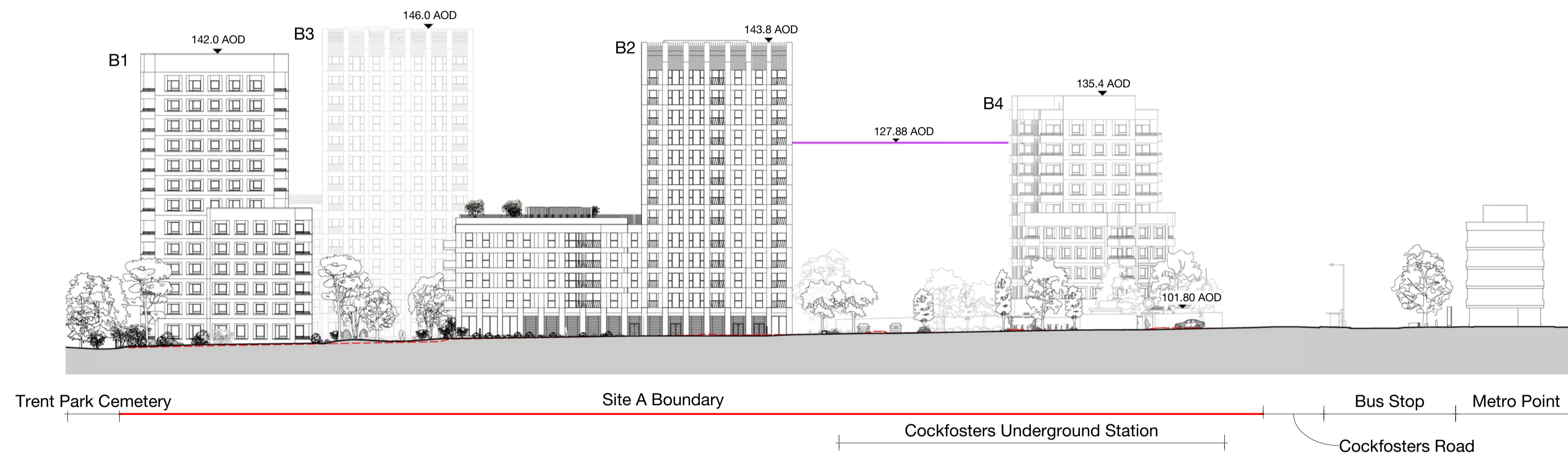
In addition to existing nearby youth facilities, the proposals include 300sqm of door step play (0-5yrs), 250sqm of local play (5-11yrs), an 80sqm dedicated youth play (12+yrs) area and 650sqm of informal play areas for all ages. The on-site play provision provides the opportunity for children to play with surveillance from nearby homes.

Age	Child yield	Play space required by GLA	Scheme provision
Under 5	29	290sqm	300sqm
5-11	20	200sqm	250sqm
12+	8	80sqm	80sqm
All			650sqm
Total	57	570sqm	1280sqm

- Key:**
- Site Boundary ———
 - Door step play (0-5yrs) - 300sqm 
 - Local play area (5-11yrs) - 250sqm 
 - Youth play area (+12yrs) - 80sqm 
 - Informal play (all ages) - 650sqm 



Site Wide Elevations

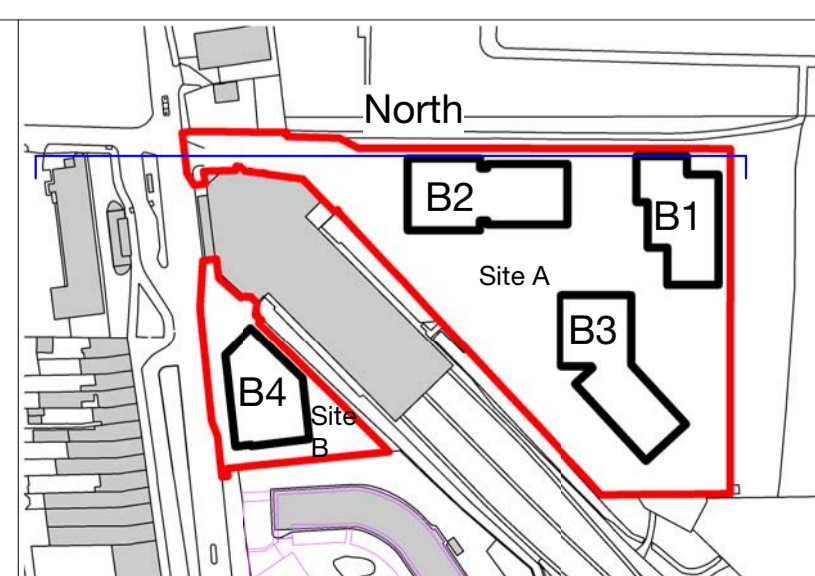


1 Proposed North Elevation
1 : 500

- - - - Existing Ground
- Blackhorse Tower Extension with Resolution to grant Planning Permission

Rev	Description	Date
P01	Planning Submission	June 2021
P02	Scheme Update	October 2021

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Scale @ A1 As indicated	Date October 2021	Job Number 190072	Project Cockfosters Station Car Parks Enfield
Drawn By NK	Checked By JC	Status S2	
Drawing No. CFCP-HBA-00-XX-DR-A-08-0220	Rev P02	Purpose of Issue Indicative	Drawing Proposed Sitewide Elevations - North

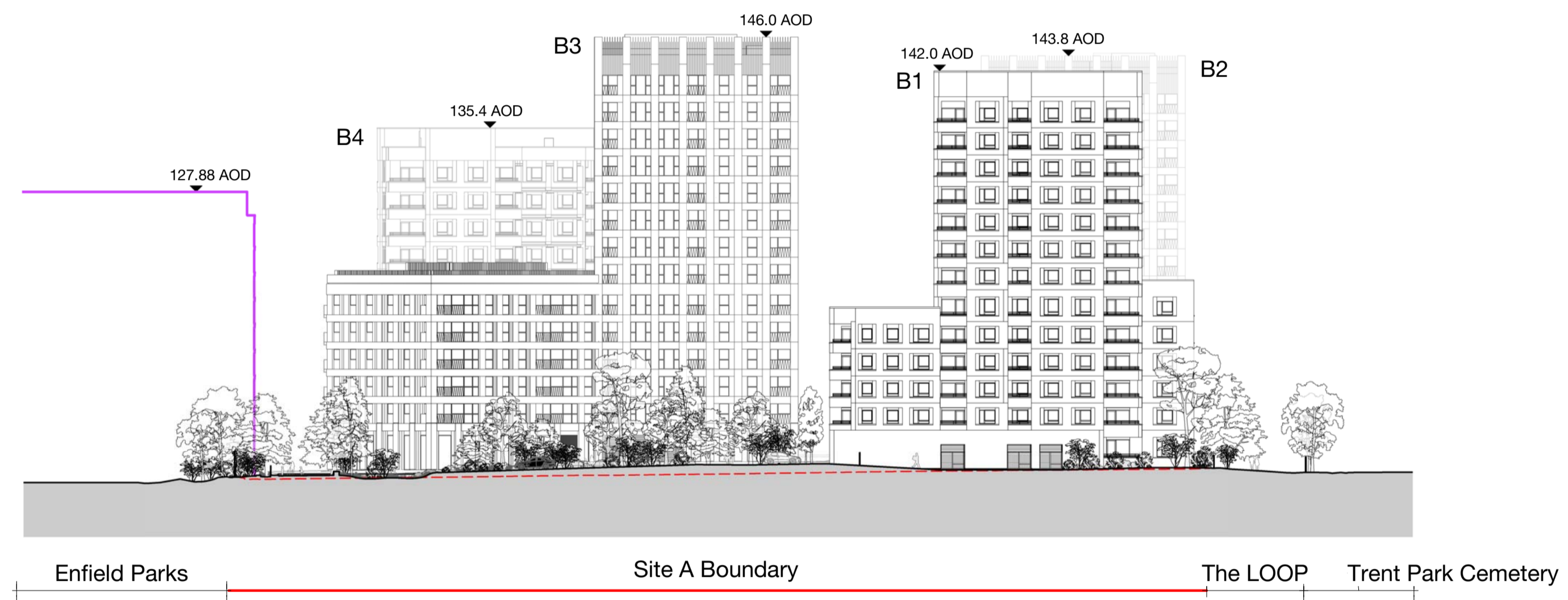
0 4 8 12 16 20m

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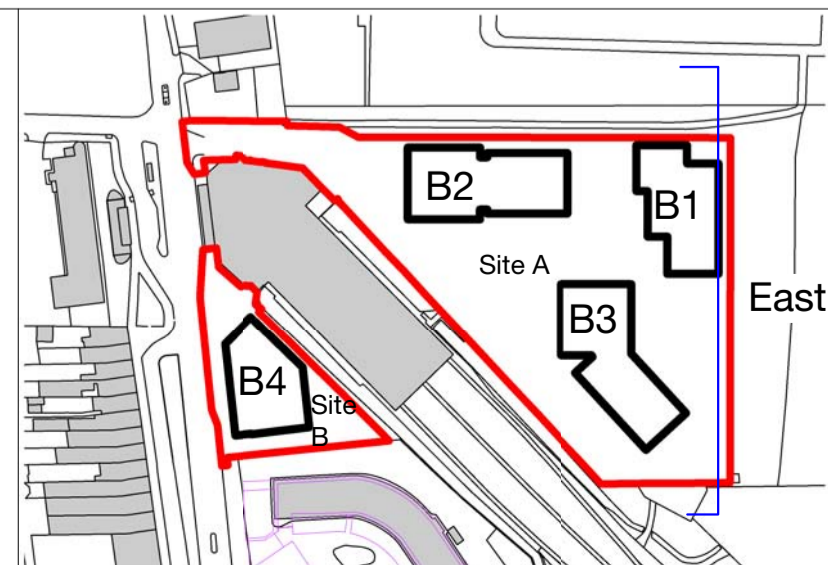
1 Proposed East Elevation
1 : 500

--- Existing Ground
 --- Blackhorse Tower Extension with Resolution to grant Planning Permission

0 4 8 12 16 20m

Rev	Description	Date
P01	Planning Submission	June 2021
P02	Scheme Update	October 2021

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Scale @ A1 As indicated	Date October 2021	Job Number 190072	Project Cockfosters Station Car Parks Enfield
Drawn By NK	Checked By JC	Status S2	
Drawing No. CFCP-HBA-00-XX-DR-A-08-0221	Rev P02	Purpose of Issue Indicative	Drawing Proposed Sitewide Elevations - East

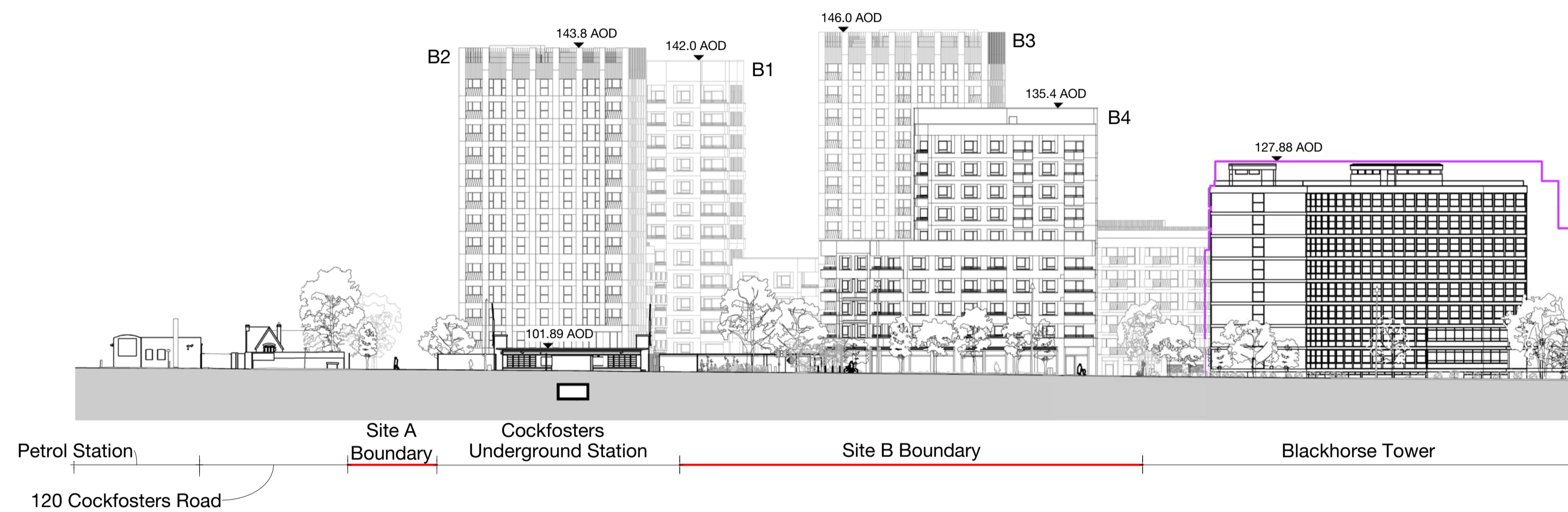
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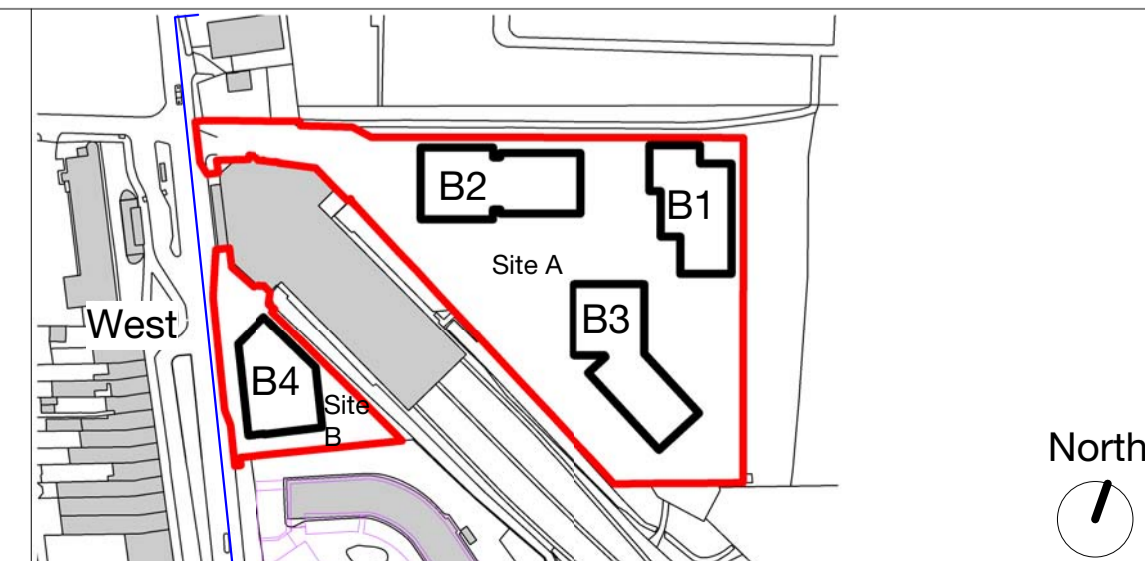
1 Proposed West Elevation - Cockfosters Road
1 : 500

Blackhorse Tower
Extension with
Resolution to grant
Planning Permission



Rev	Description	Date
P01	Planning Submission	June 2021
P02	Scheme Update	October 2021

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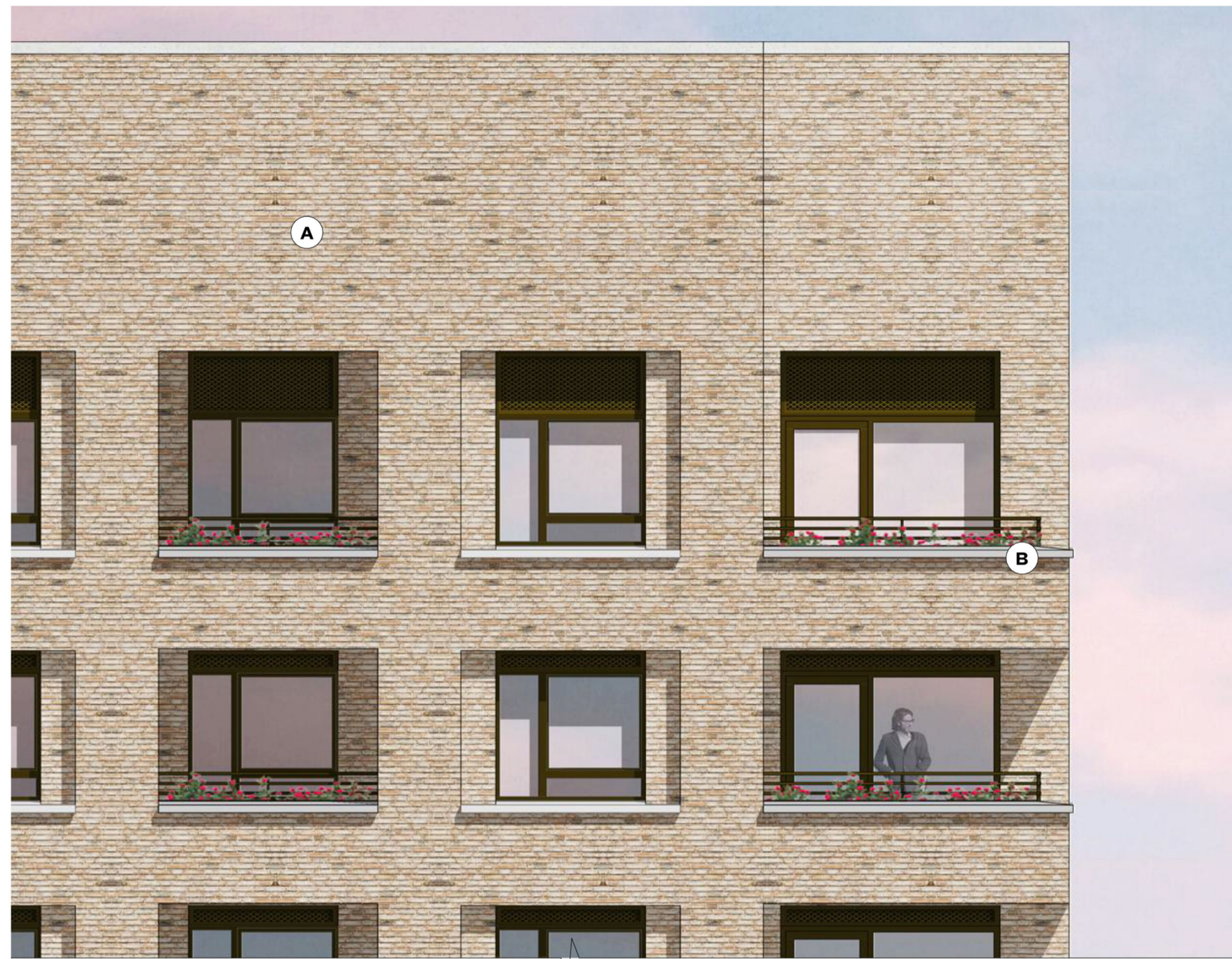


Scale @ A1	Date	Job Number	Project
As indicated	October 2021	190072	Cockfosters Station Car Parks Enfield
Drawn By	Checked By	Status	
PQC	JC	S2	
Drawing No.	Rev	Purpose of Issue	Drawing
CFCP-HBA-00-XX-DR-A-08-0222	P02	Indicative	Proposed Sitewide Elevations - Cockfosters Road (West)

Project	Cockfosters Station Car Parks Enfield
Drawing	Proposed Sitewide Elevations - Cockfosters Road (West)

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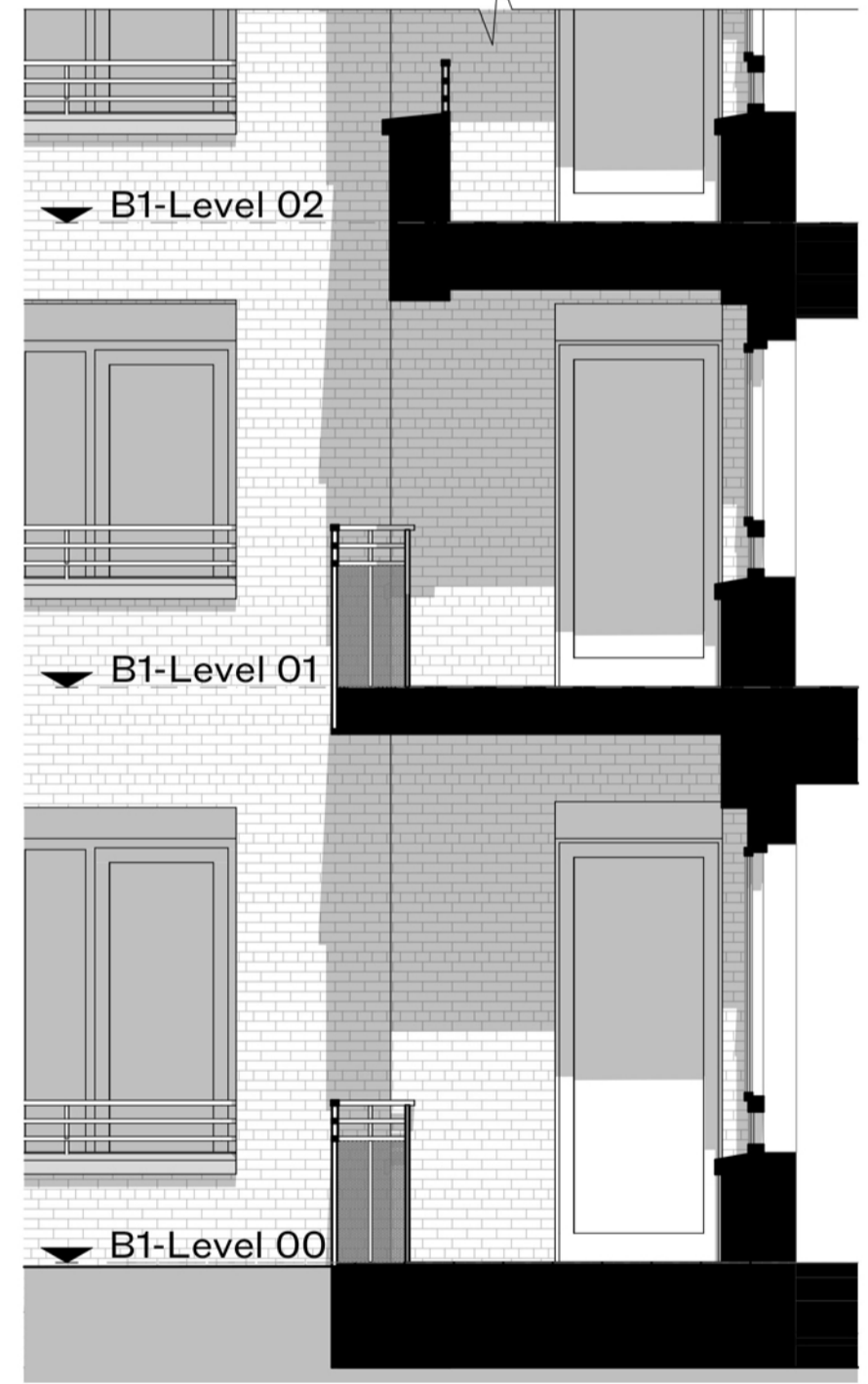
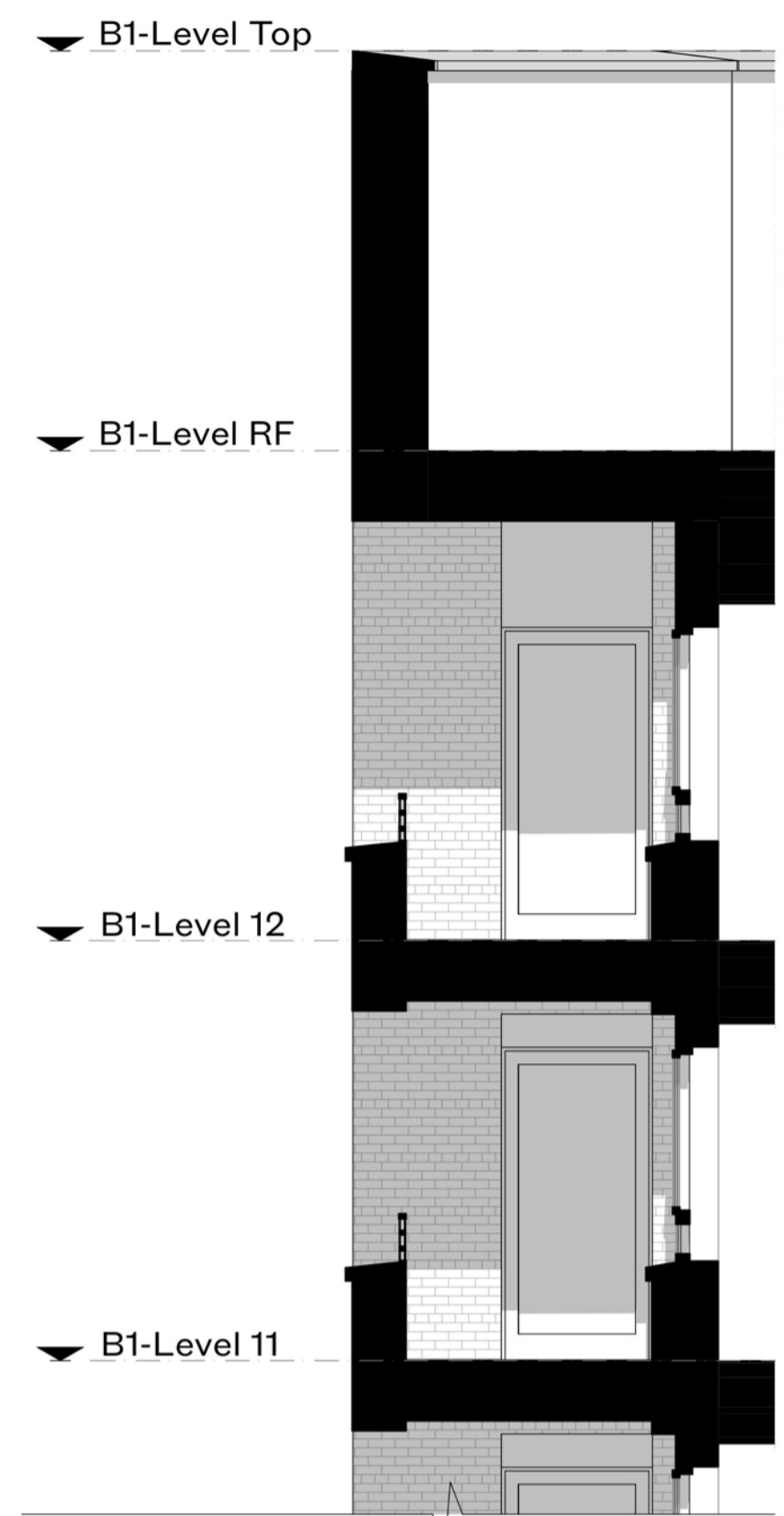
Typical Bay Studies



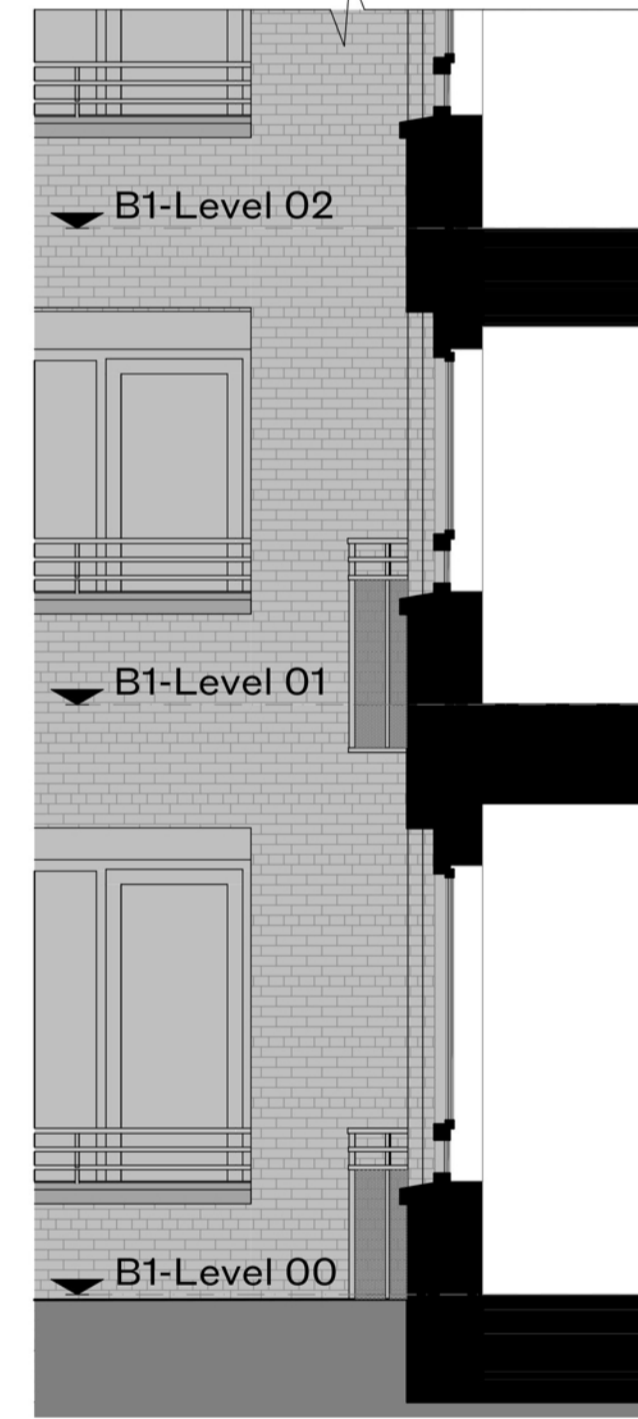
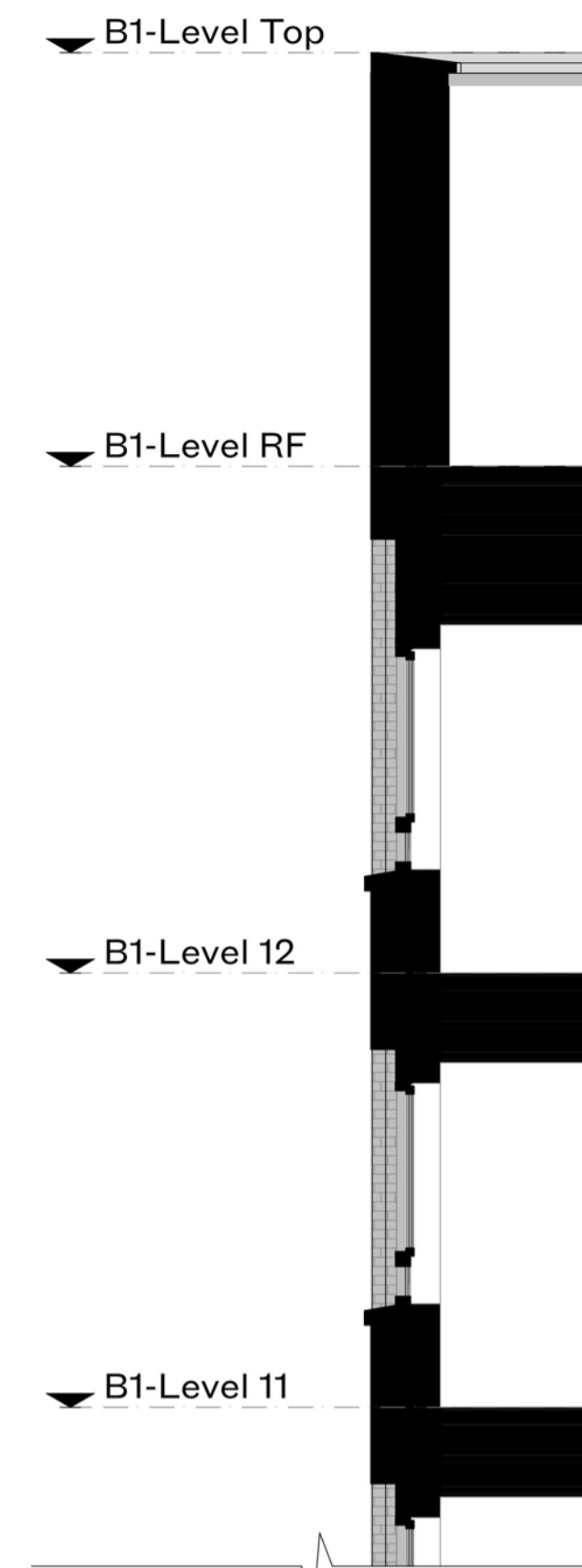
1 GA - Block 01 West Elevation 1:50



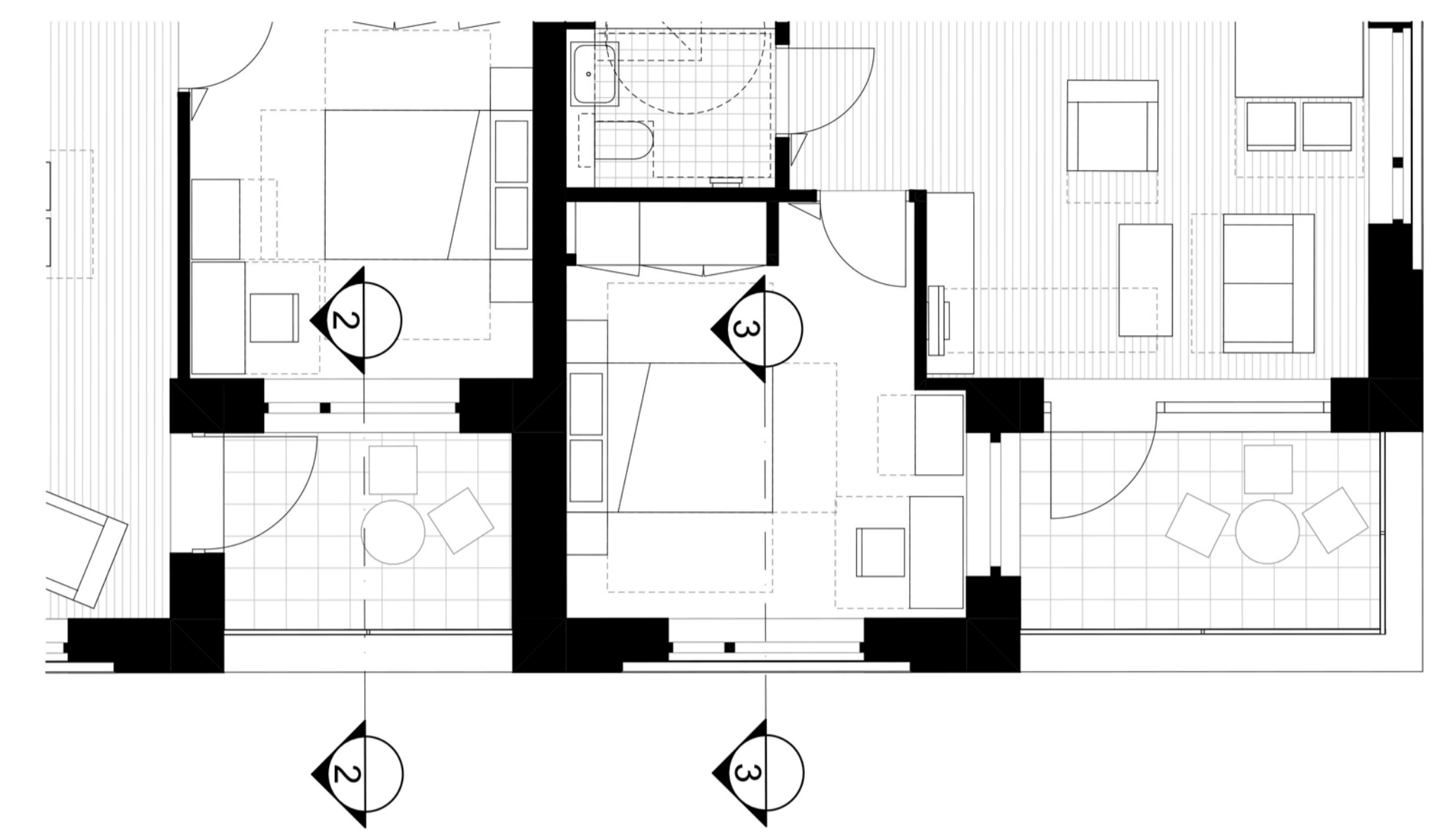
A Soft Buff Brick B Concrete Coping/Sill C Bronze Colour Metal Work D Perforated metal balustrade



2 GA - Block 01 Section 1:50



3 GA - Block 01 Section 1:50



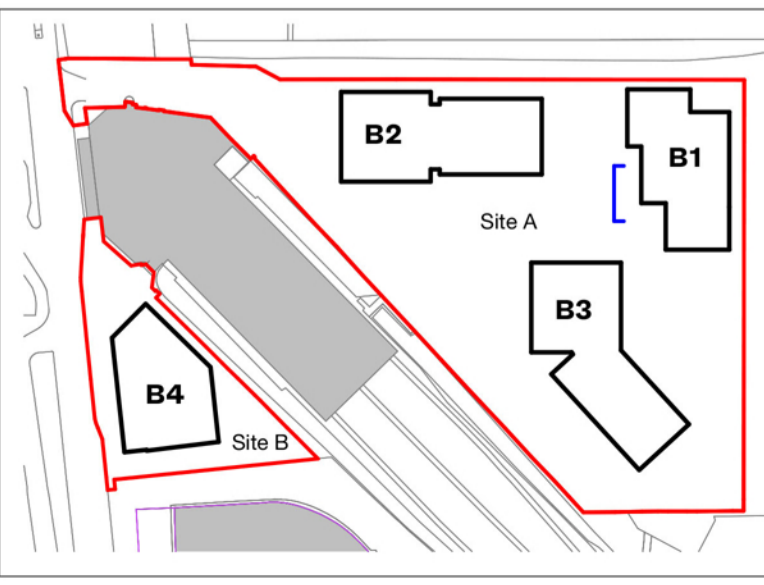
4 GA - Block 01 Typical Upper Floor Plan 1:50



Rev	Description	Date
P01	Planning Submission	June 2021
P02	Scheme Update	October 2021

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 6. This drawing shows design intent only.
 7. Contractor should verify all conditions, levels and dimensions on site and notify contract administrator of any variations from dimensions before construction and/or fabrication.
 8. Any discrepancies on this drawing should be reported to Mae before proceeding to fabrication.
 9. Drawings to be read in conjunction with all relevant documents, which include but are not exhaustive - MEP, Structures, shop/fabrication drawings and CDM documents.
 10. This drawing may contain colour data. Please refer to original electronic document.
 11. These are architectural drawings only. Refer to consultant drawings for further information.
 12. Existing buildings to be measured on site and confirmed by contractor.
 13. Also refer to accompanying Architects Schedules and drawings.



Scale @ A1 1:50 @ A1	Date October 2021	Job Number 1920	Project Cockfosters Station Car Parks Enfield
Drawn By AH	Checked By MPH	Status S2	
Drawing No. CFCP-MAE-B1-XX-DR-A-08-0255	Rev P02	Purpose of Issue For Approval	Drawing Block 1 - Typical Bay Study

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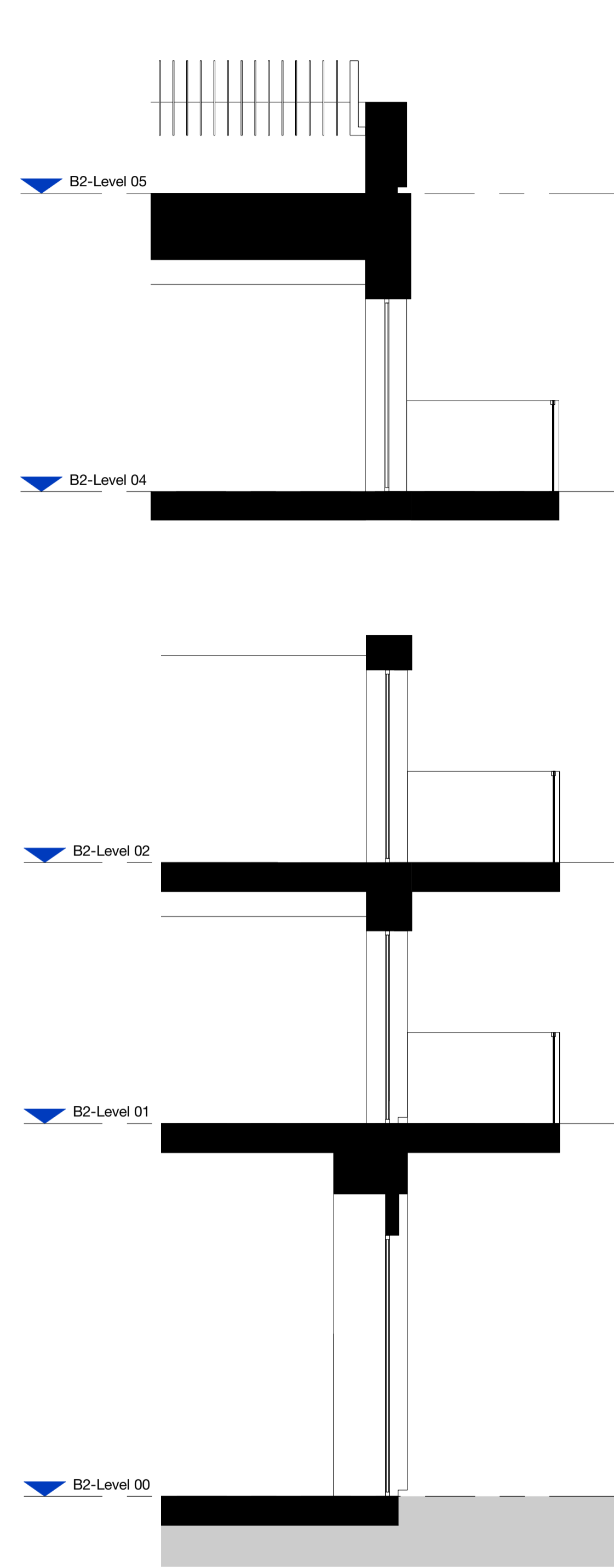
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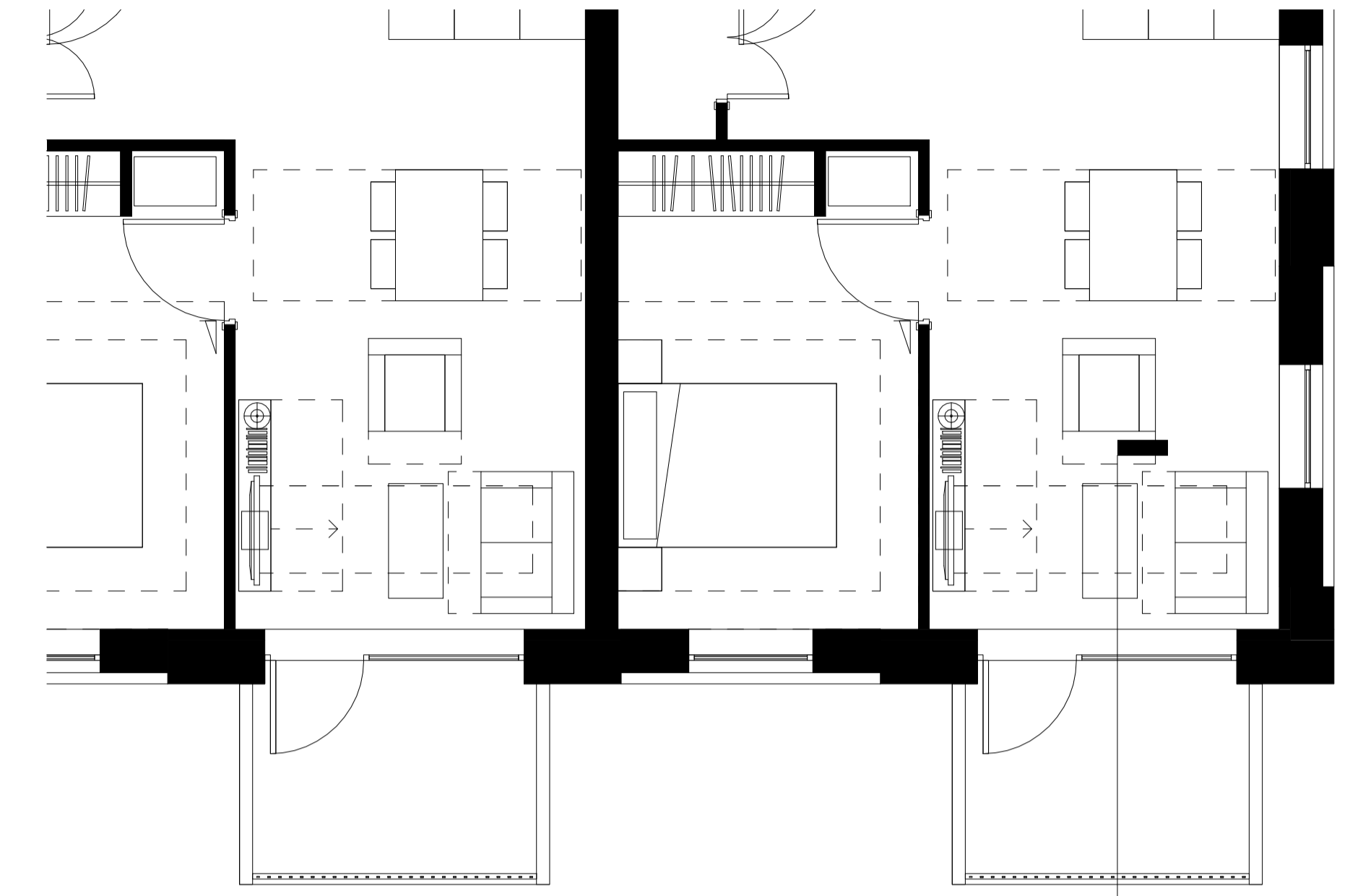
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1 Block 2 - Bay Study A
1 : 50



2 Block 2 - Typical Section A
1 : 50

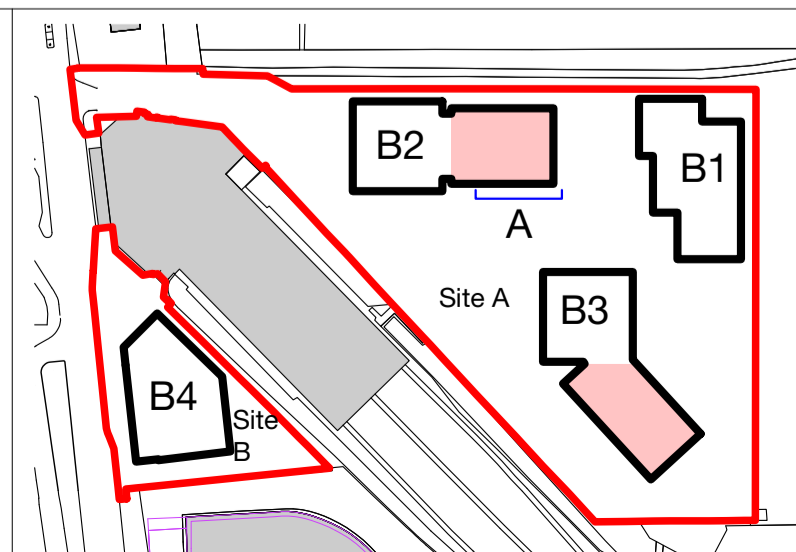


3 Block 2 - Typical Lower Floor Plan A
1 : 50



Rev	Description	Date
P01	Planning Submission	June 2021

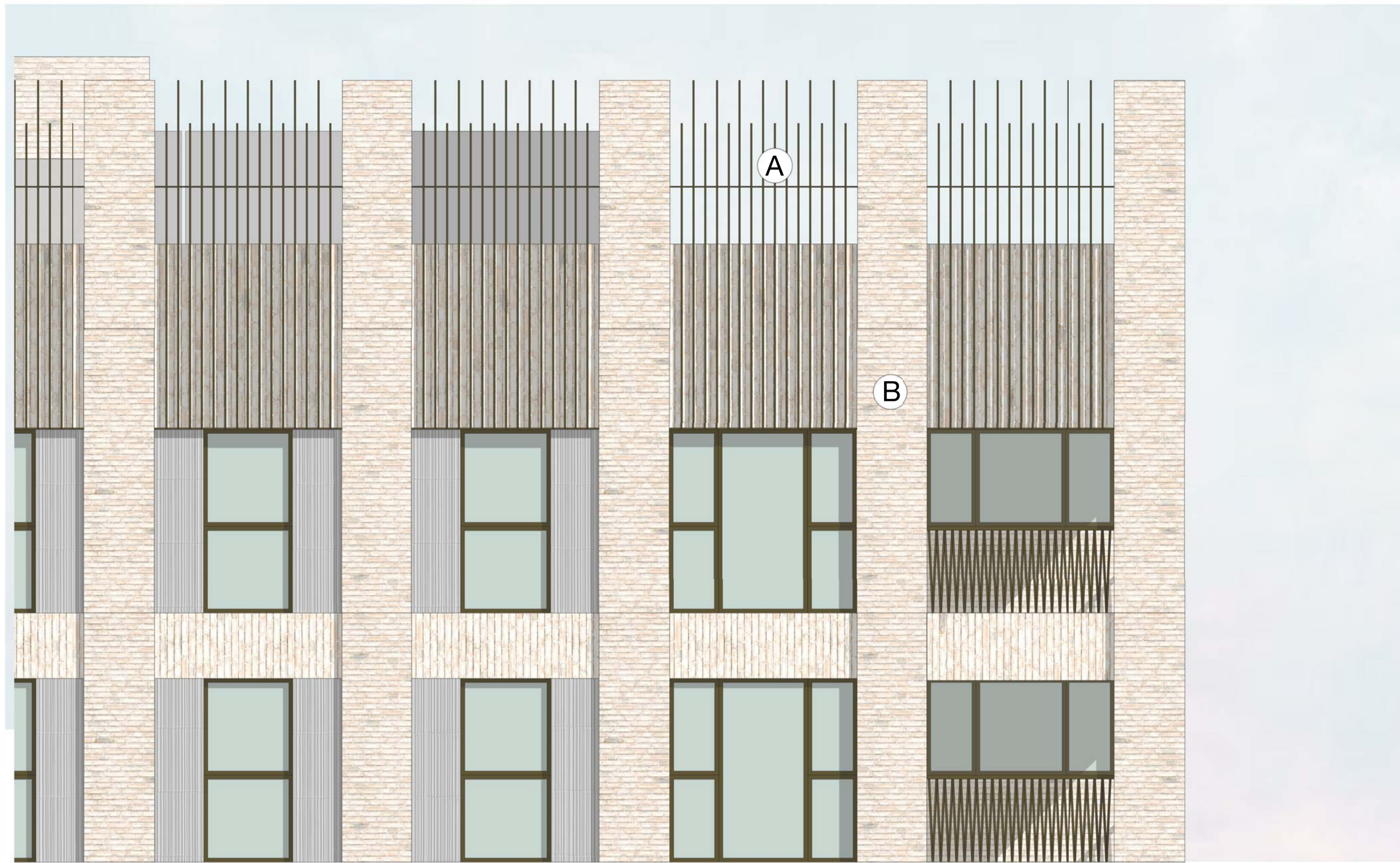
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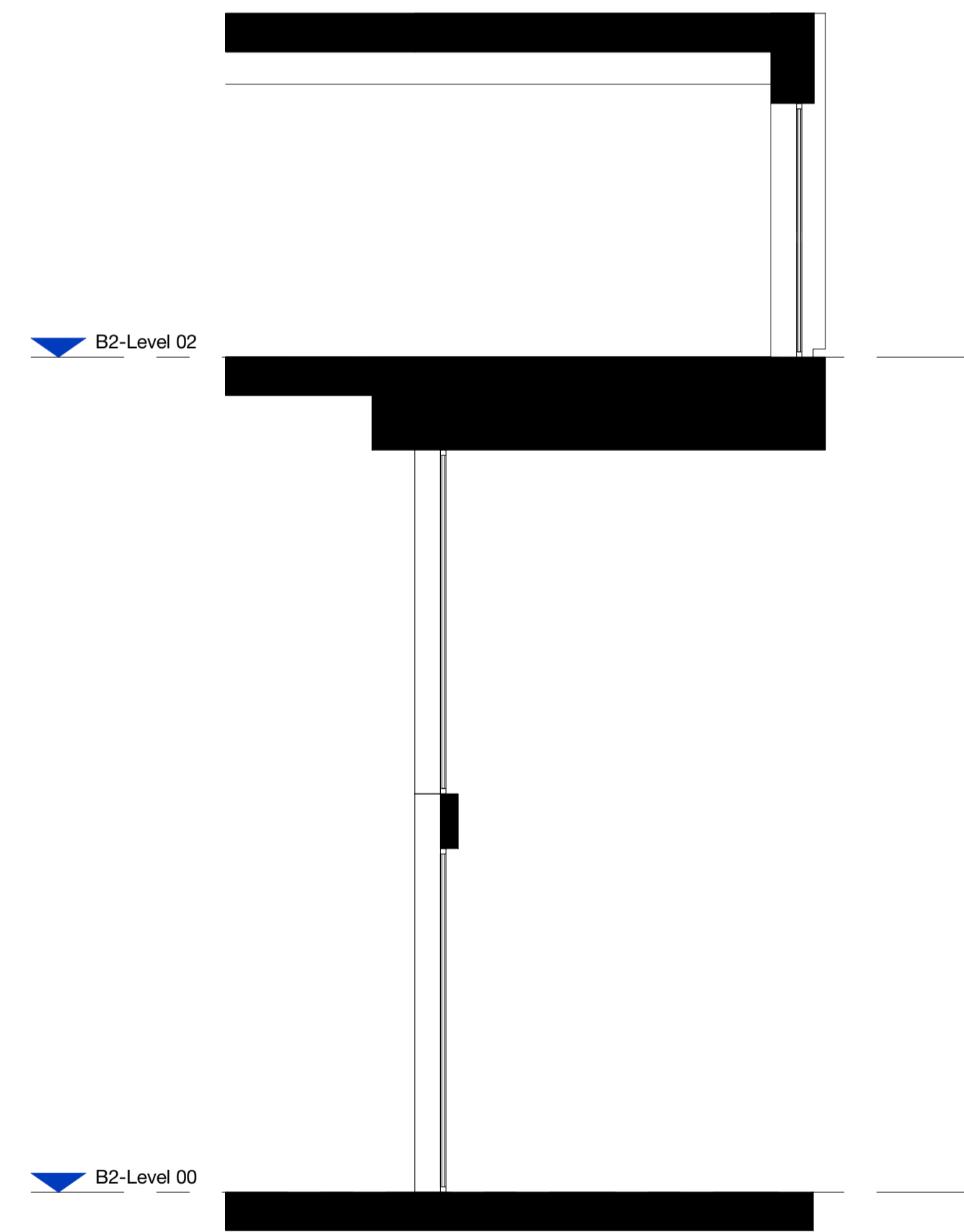
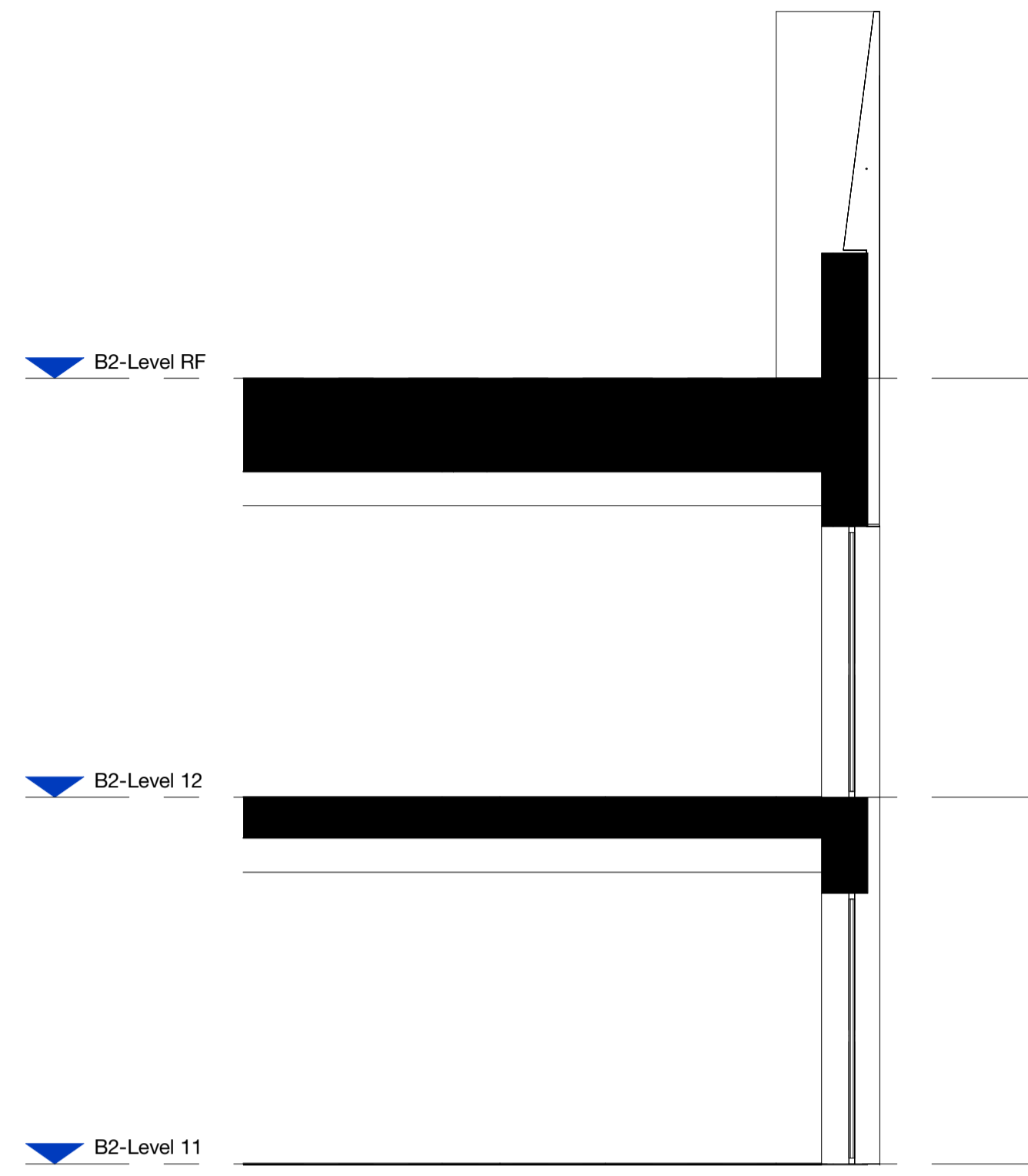
Key Plan North

Scale @ A1 As indicated	Date June 2021	Job Number 190072	Project Cockfosters Station Car Parks Enfield
Drawn By RK	Checked By JC	Status S2	
Drawing No. CFCP-HBA-00-XX-DR-A-08-0265	Rev P01	Purpose of Issue For Approval	Drawing Block 2 + 3 - Typical Bay Study A

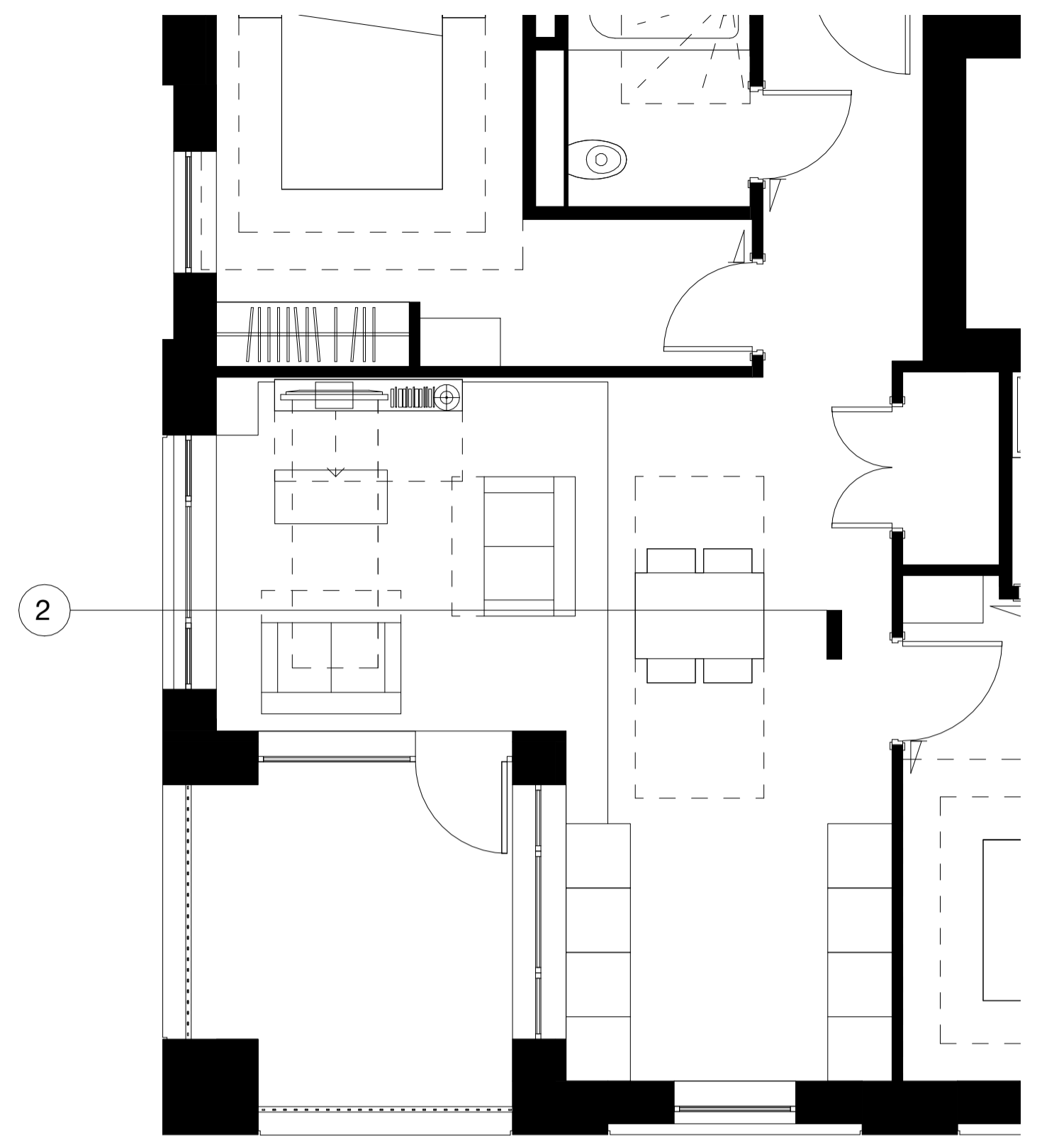




1 Block 2 - Bay Study B
1 : 50



2 Block 2 - Typical Section B
1 : 50

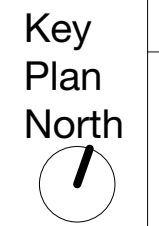
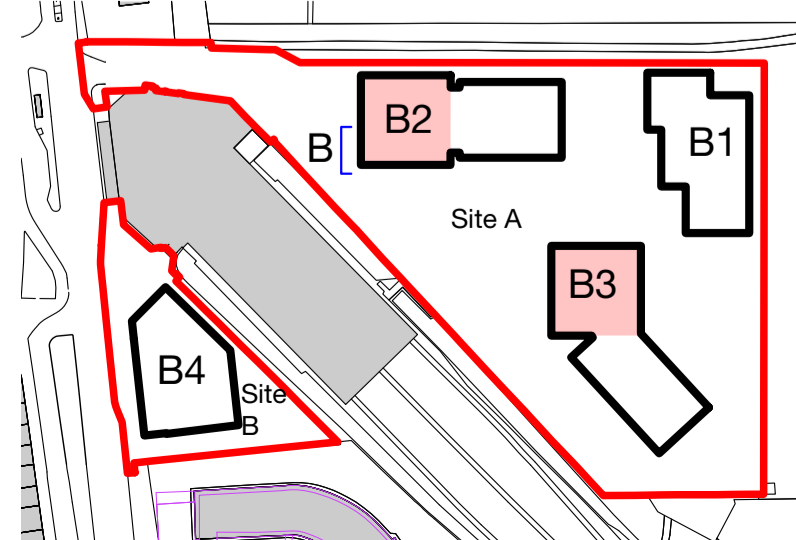


3 Block 2 - Typical Upper Floor Plan
1 : 50



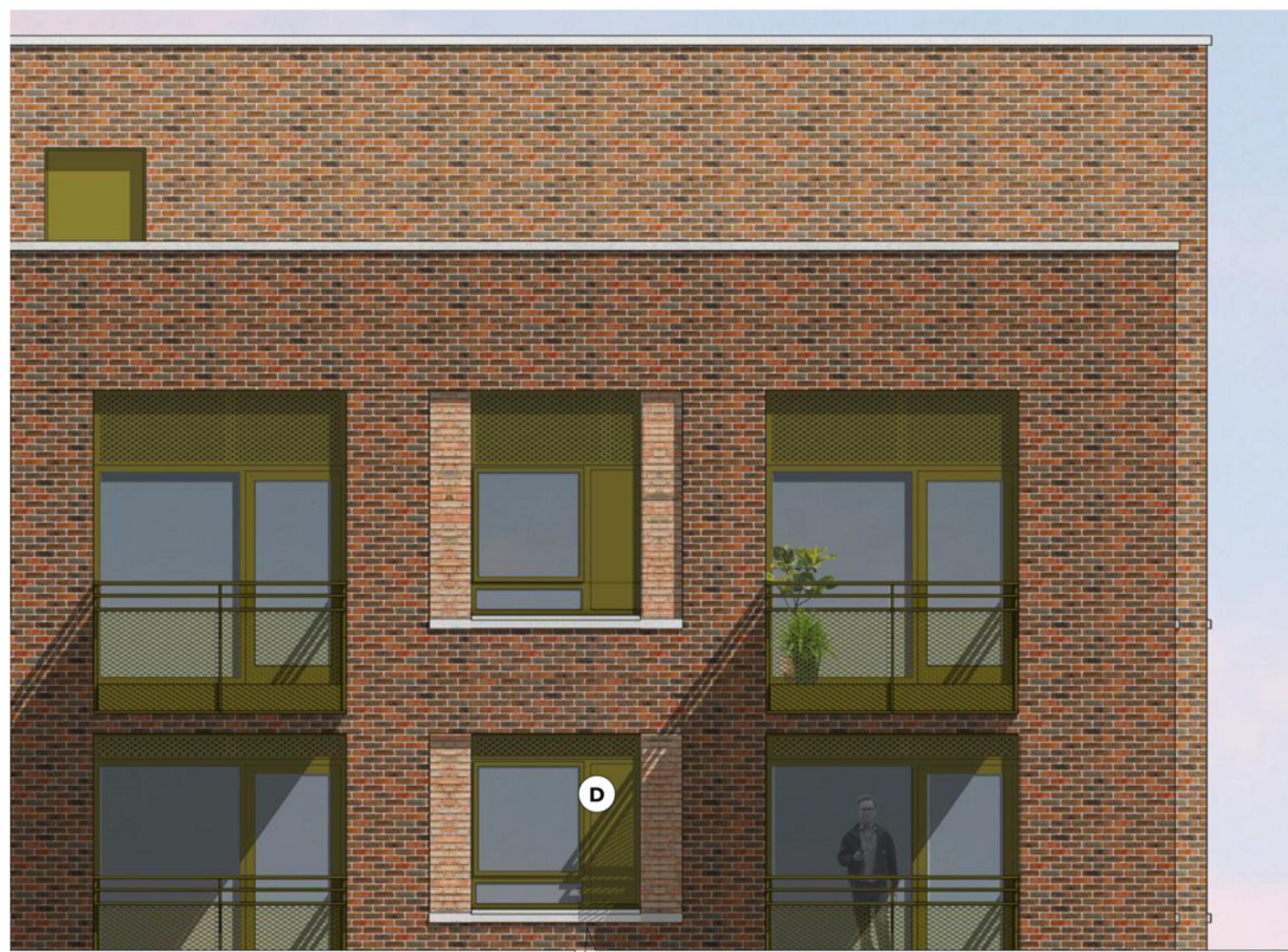
Rev	Description	Date
P01	Planning Submission	June 2021

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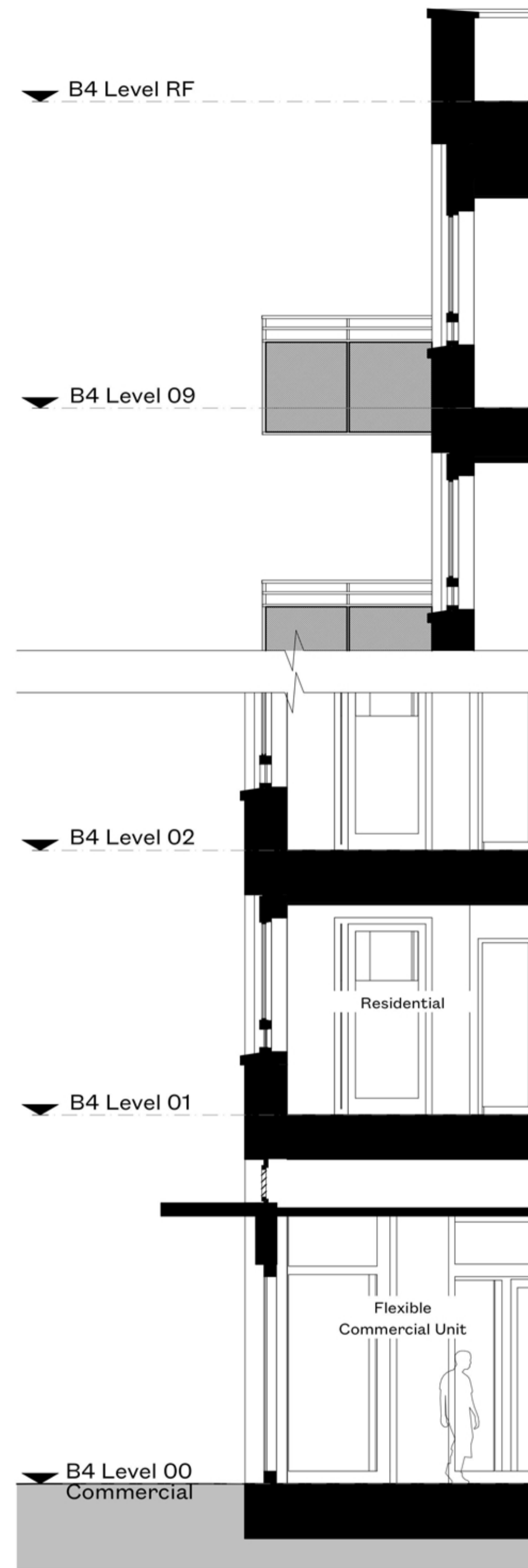


Scale @ A1 As indicated	Date June 2021	Job Number 190072	Project Cockfosters Station Car Parks Enfield
Drawn By RK	Checked By JC	Status S2	
Drawing No. CFCP-HBA-00-XX-DR-A-08-0266	Rev P01	Purpose of Issue For Approval	Drawing Block 2 + 3 - Typical Bay Study B

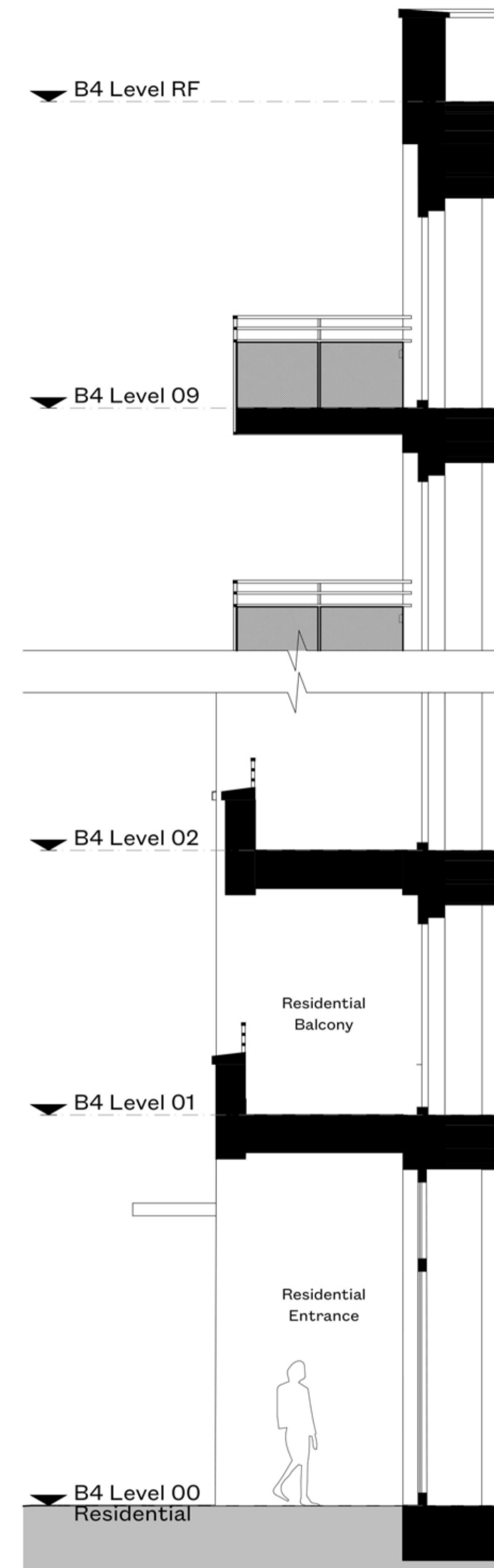
159 St John Street London EC1V 4GJ mail@hawkinsbrown.com hawkinsbrown.com
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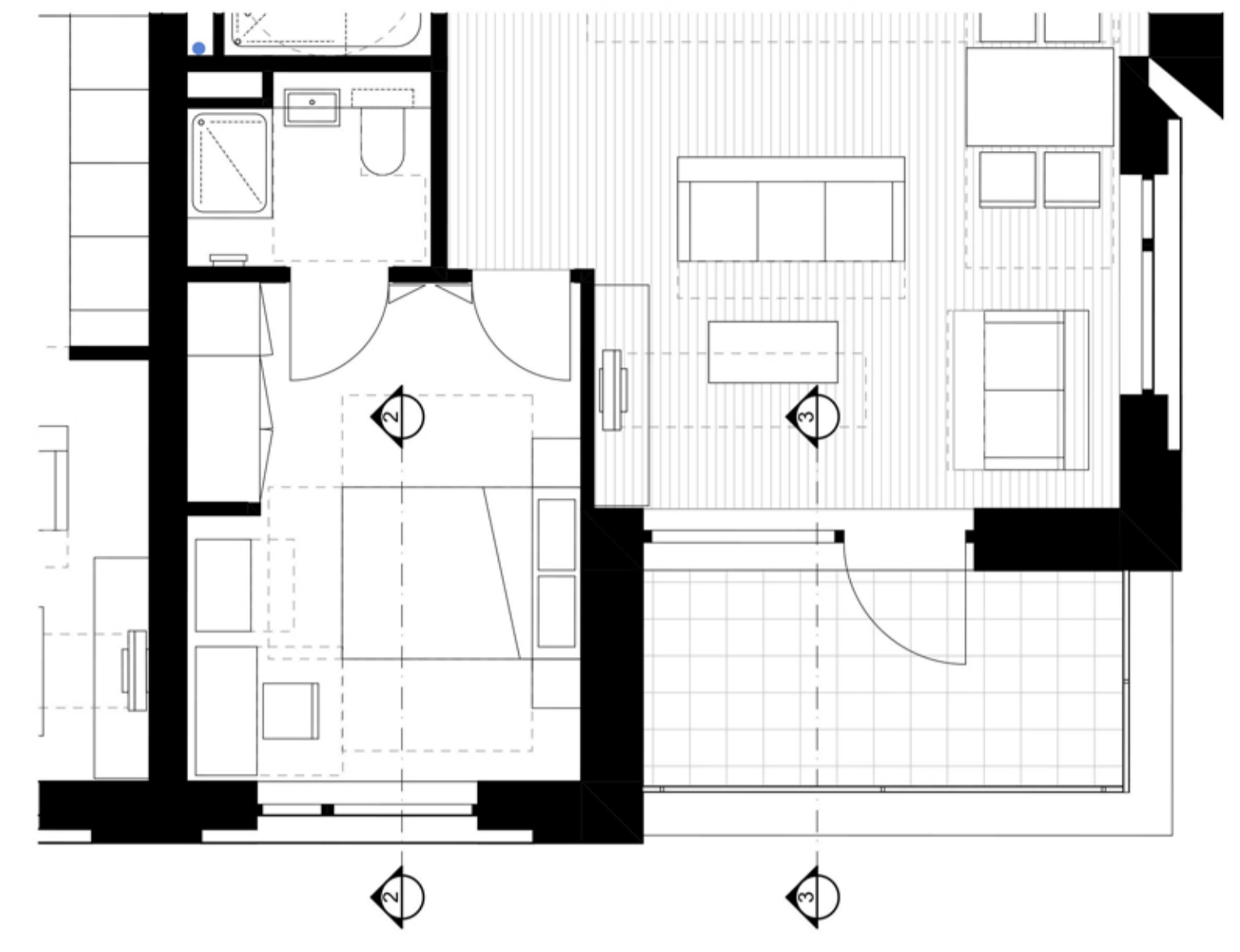
1 GA - Block 04 West Elevation 1:50



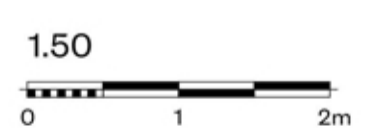
2 GA - Block 04 Section 1:50



3 GA - Block 04 Section 1:50



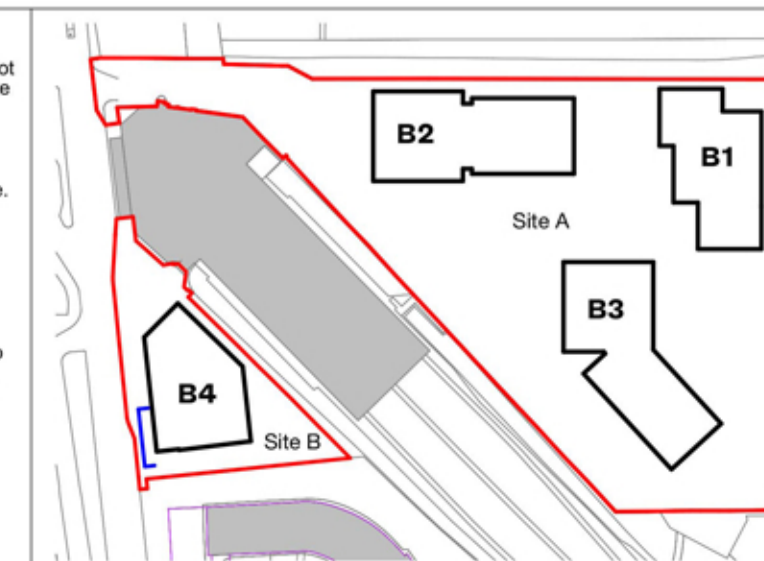
4 GA - Block 04 Section 1:50



Rev	Description	Date
P01	Planning Submission	June 2021
P02	Planning Addendum	November 2021

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 2. All levels are in meters to Ordnance Datum Newlyn (ODN) unless noted otherwise.
 3. Do not scale off the drawing and CAD file.
 4. All shown figure dimensions are to be followed.
 5. Do not use for construction unless expressly permitted.
 6. This drawing shows design intent only.
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 12. Existing buildings to be measured on site and confirmed by contractor.
 13. Also refer to accompanying Architects' Schedules and drawings.



Scale @ A1 1:50 @ A1	Date October 2021	Job Number 1920	Project Cockfosters Station Car Parks Enfield
Drawn By RP	Checked By MPH	Status S2	
Drawing No. CFCP-MAE-B4-XX-DR-A-08-0285	Rev P02	Purpose of Issue For Approval	Drawing Block 4 - Typical Bay Study

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Materials & Response to Context

Note

Replacement for DAS page 86.

Chapter 4: Design

4.2 Façade Design

The unique nature of the site's setting has influenced and shaped the proposed architectural approach. It offers a carefully proportioned, simple facade composition made of a small, well considered, palette of quality materials that will complement the setting and provide a calm backdrop to the existing town and landscape.

4.2.1 Responding to the Context

The collection of four buildings are positioned to carefully respond to the constraints and characteristics of the local area. The analysis of views undertaken at every stage has helped shape a series of forms that are simple and elegant in proportion.

The carefully composed taller elements are designed to be seen above the existing tree line, whilst their accompanying shoulder blocks are of a smaller scale, addressing the new publicly accessible landscape at the heart of the proposed scheme.

The two sites each respond to their own immediate context. Site A addresses the setting of the listed station and the surrounding countryside. Site B turns to the established local centre and high street of Cockfosters. Together they both frame and improve the setting of Cockfosters Station.

Site A takes reference from the brick and concrete palette successfully used in the Charles Holden designed station. The rational rhythm of simple forms, which primarily responds to the simple geometric design of the listed station offers a calm backdrop to the landscape central to the scheme. The use of high quality materials and carefully composed building tops with eroding corners and feathering edges, create a lighter appearance against the sky.

Site B adopts the proportions and materiality of the prominent high street continuing the language of shop frontage to Cockfosters Road, and improving pedestrian access. A complimentary, contextual material palette helps to integrate with the neighbouring vernacular.



Right
Sketch View
of Block 1, as
seen from the
Central Space

Note
Replacement for DAS page 87.

4.2.2 Context Material Palette

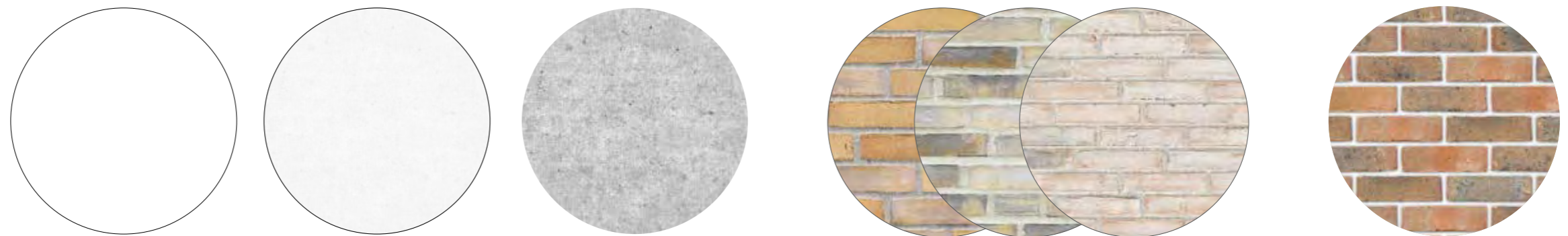
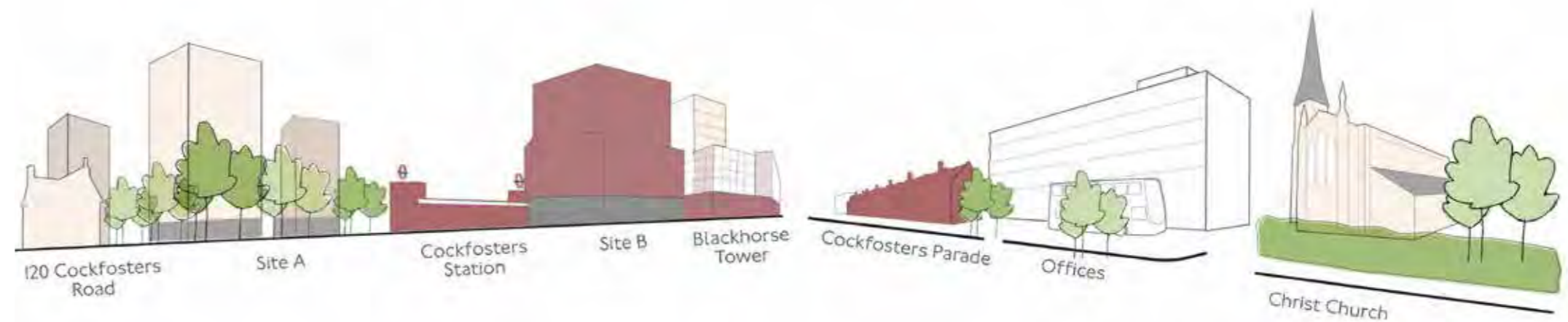
The proposed approach to materiality responds to the existing character of the area, complementing the existing historic and environmental assets of the site and locality. The diagram shown on this page illustrates the materiality of the proposals and how it integrates with the existing material context.

Adopting the local vernacular, the blocks are proposed to be composed predominately of brick with subtle tonal variation and moments of varying bonds. On Site A, the pale brick colours reference the historic Christ Church. Block 4 on Site B responds more directly to the context of the high street, adopting a red brick similar to much of the surrounding character area as well as the station.

The concrete base of the proposed blocks draws further reference to Charles Holden's station where it is wonderfully executed in a board marked exposed finish that defines the double height space at the lower concourse level. This concrete base level of Blocks 2 and 3 respond to the single story datum line established by the listed station.



○ 120 Cockfosters Road ● Cockfosters station ● Blackhorse Tower redevelopment ● Cockfosters Parade ○ Christ Church



○ Painted Render ○ GRC Cladding Panels ○ Concrete base level ○ ○ ○ Pale Brick 01, 02 & 03 ● Red Brick

Right
Proposed
Materials
Diagram,
responding
to the
context

Note
Replacement for DAS page 88.

4.2.3 Proposed Materials

Concept

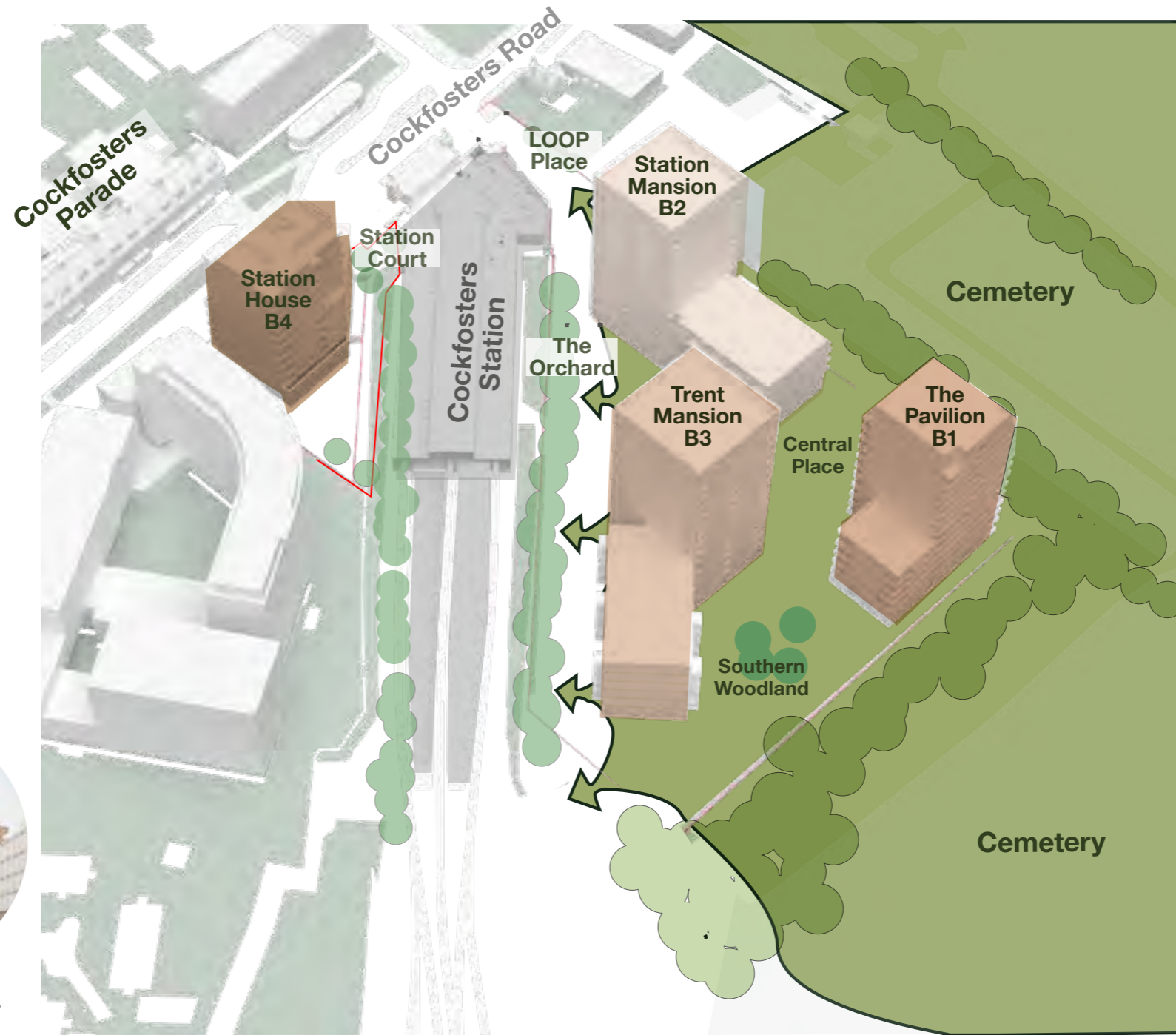
- Respond to the immediate context
- Acknowledge materials of the local setting
- Use contemporary reinterpretations of the local materiality.

Site A

- Extends the character of Trent Park to the north.
- Use of concrete references Cockfosters Station
- Light buff bricks references Christ Church.

Site B

- Use of concrete references Cockfosters Station
- Red brick combines the station's character with that of Cockfosters Parade opposite.



Station House B4



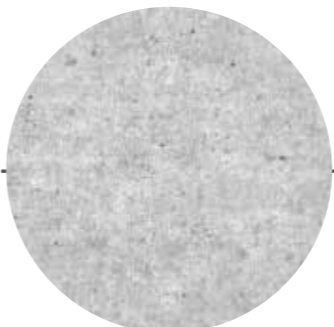
Station Mansion B2



Trent Mansion B3



The Pavilion B1



Right
Proposed Materials across the two character areas

Note
Replacement for DAS page 89.

4.2.3 Proposed Materials

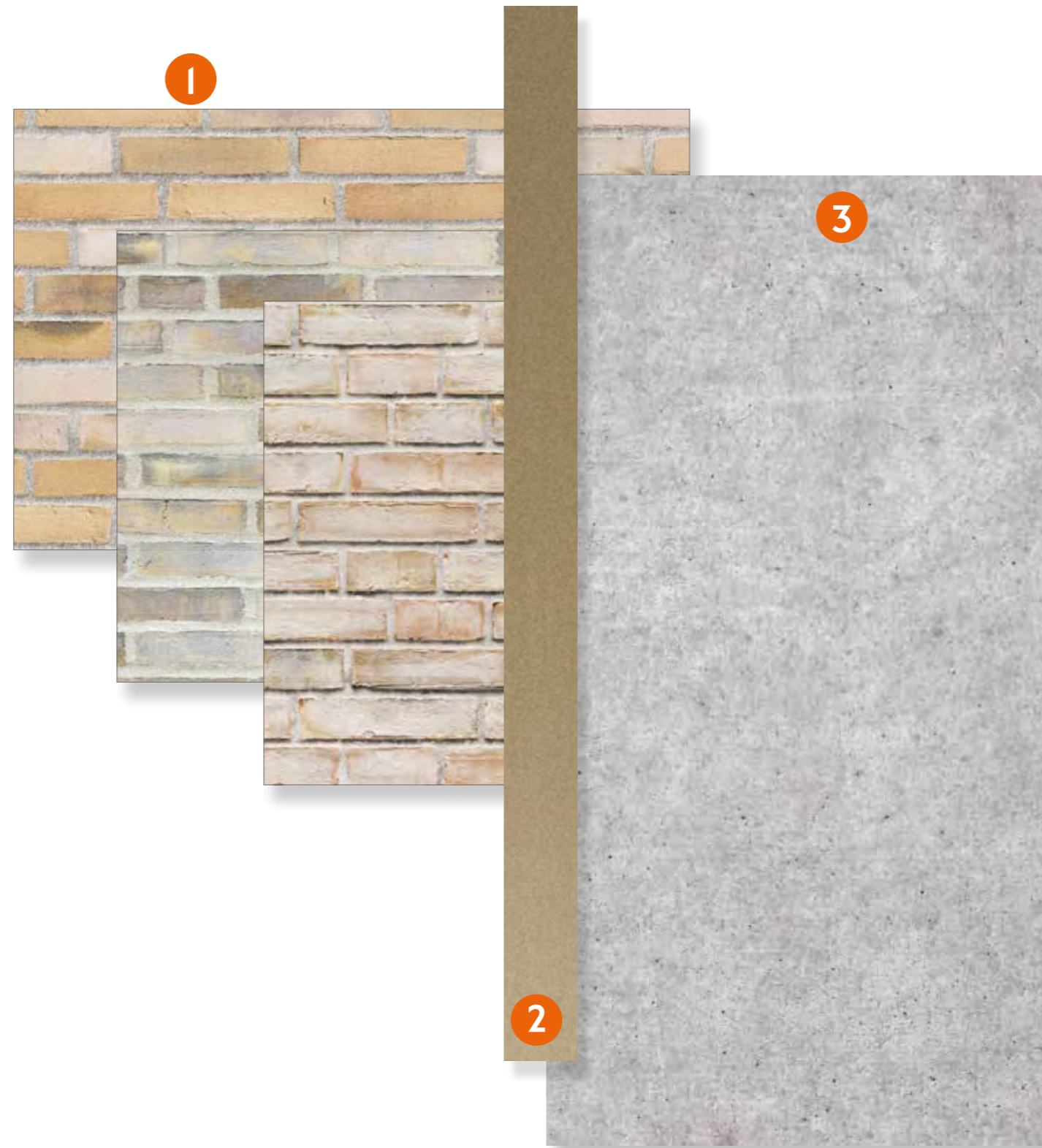
Site A

Materials

- The proposed materials are subtle and robust.
- Their natural finishes and textures reference the nearby rural characters.
- The variations of the soft buff brick breaks down the façades, and give it a human scale.
- The collection of materials create a soft but tactile architecture across the site.

The Top of the buildings

- Metal is introduced to celebrate the crown, ensuring that where there is height on the proposal, high quality materials are used.



1 Brick
Three soft buff bricks, sensitively responding to the rural location

2 Crown and metalwork
Celebrating the tops of the taller elements with high quality decorative metal fins

3 Concrete
Referencing the concrete construction of the adjacent Cockfosters station



Christ Church



Cockfosters Station Interior



120 Cockfosters Road

4.2.3 Proposed Materials

Site B

Sitting within the urban setting of Cockfosters Road and the high street, the proposed materials for Block 4 respond directly to the adjacent context. The use of concrete and red multi-brick combines the station's character with that of the high street.

The choice of materials together with the architectural language create façades with a calm simplicity, enhancing the high street rather than competing with it.

The ground level plinth is faced in a pale concrete material that distinguishes the base of the building and resonates with the concrete used in the station. The contrasting plinth helps to define a more human scale to the public realm along the high street and station setting.

The metalwork brings a richness to the proposed materials, weaving itself up the building bringing a unity to the two contrasting materials.

1 Brick

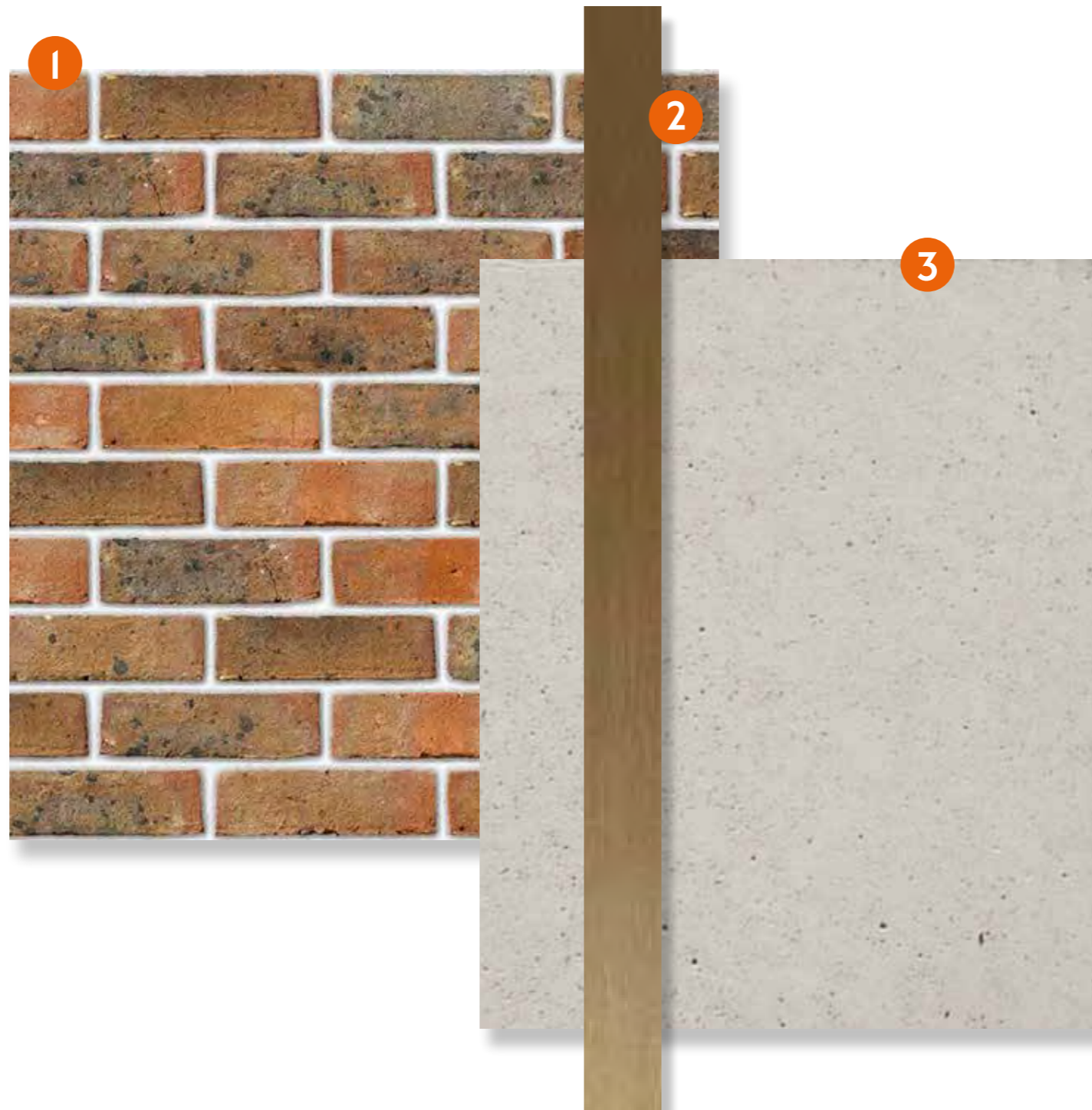
A rich multi-brick, sensitively responding to the character of the high street

2 Metalwork

Dark bronze tone compliments both the brick tone and concrete.

3 Concrete

Referencing the concrete construction of the adjacent Cockfosters Station



Cockfosters Station



Station Parade



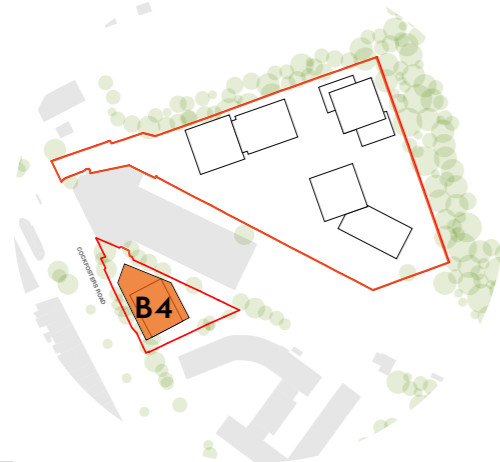
Blackhorse Tower

4.2.8 Block 4 - Facade Design


Station House (Block 4) Bay Study


A rich red/ brown brick is proposed as the primary elevation material which is complimentary to the red brick that is predominant in the vicinity along Cockfosters Road. The ground level plinth is faced in a pale concrete material that distinguishes the base of the building and resonates with the concrete used in the underground station as well as the façades of neighbouring Blackhorse Tower and other local buildings.

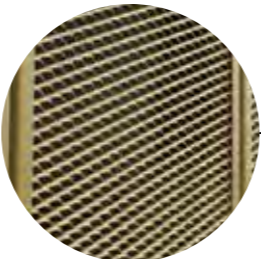
The ground floor shop frontage and the residential balustrade and window metalwork is in a dark bronze tone; both compliment the tone of the brickwork and concrete as well as help to tie the two elements together.





Right Block 4 Bay Study


- 


Brick
A rich multi-brick as reference to the local context
- 

Window Recess
A recessed brick panel and metal over-panel create larger openings and depth to the facade
- 

Balustrade
Expanded metal panel provides users privacy
- 

Balcony
Matching the colour of the metal work
- 

Metal Work
Dark bronze tone compliments the brick tone
- 

Curtain Walling
Large generous glazed frontages inviting people in
- 

Concrete
Referencing the concrete construction of the adjacent Listed station

Note
Replacement for DAS page I04.

