

LONDON BOROUGH OF ENFIELD

PLANNING COMMITTEE

Date: 8 March 2022

Report of
Head of Planning

Contact Officer:
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Ward: Upper
Edmonton

Application Number: 21/04271/RE4

Category: Major

LOCATION: Upton Road and Raynham Road London N18 2LJ

PROPOSAL: Demolition of Beck House and garages on Upton Road and construction of 134 residential dwellings (Use Class C3) and up to 188sqm flexible commercial floorspace (Use Class E) comprising buildings up to 7 storeys in height, and the change of use of ancillary garages to part of lower ground floor of Scott House (Use Class C3) to provide up to 70sqm community hall (Use Class F2(b)), 45sqm ancillary management office (Use Class C3), podium deck, along with associated means of access and highways works; car and cycle parking; hard and soft landscaping; play space and public, communal, and private realm; refuse storage; ancillary plant and structures; and works to Scott House to create new access at lower ground and ground floor levels.

Applicant Name & Address:
LBE Housing

Agent Name & Address:
HTA, 78 Chamber Street, London, E1 8BL

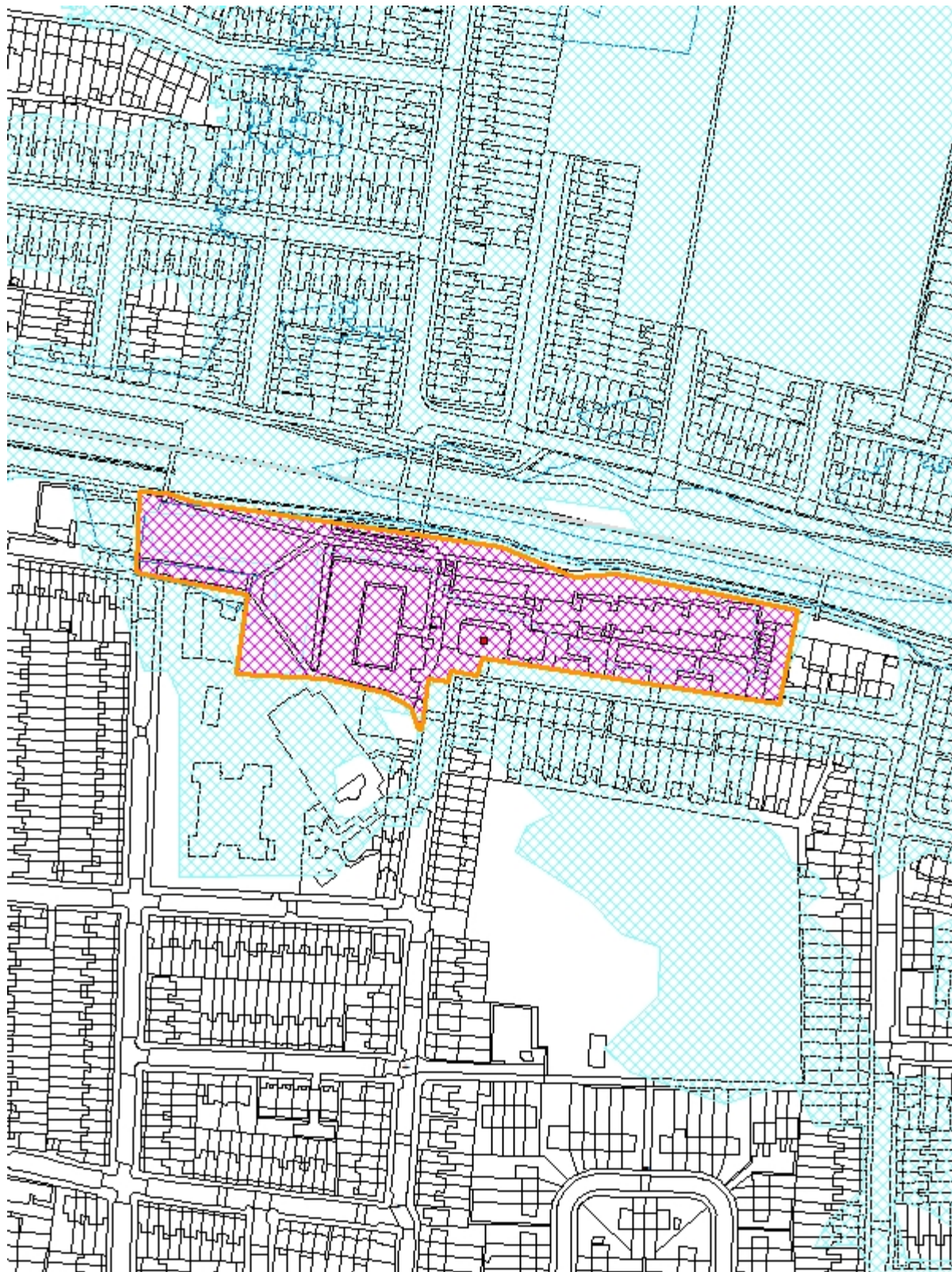
RECOMMENDATION:

1 That in accordance with Regulation 3 of the Town and Country Planning General Regulations 1992, subject to no objections being received from the Environment Agency, the finalisation of a shadow S106 to secure the matters covered in this report and to be appended to the decision notice, the Head of Development Management be authorised to **GRANT** planning permission subject to conditions.

2 That the 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.

1. Note for Members

- 1.1 This planning application is categorised as a 'major' planning application and the Council is the landowner and applicant. In accordance with the scheme of delegation it is reported to Planning Committee for determination.



2. Recommendation

2.1. That in accordance with Regulation 3 of the Town and Country Planning General Regulations 1992, subject to no objections being received from the Environment Agency, the finalisation of a shadow S106 to secure the matters covered in this report and to be appended to the decision notice, the Head of Development Management be authorised to **GRANT** planning permission subject to conditions to cover matters set out below:

2.2. That delegated authority be granted to the Head of Development Management to finalise the wording of the shadow S106 obligations and the recommended conditions as set out in this report.

1. Compliance with shadow Section 106 Agreement
2. Compliance with S106 Obligations
3. Time limit
4. Approved drawings (compliance)
5. Maximum residential units/housing mix
6. Maximum quantum of commercial floorspace
7. Restriction on PD changes of use
8. No fixing of plant and equipment to external facades other than in accordance with approved plans.
9. Restriction on commercial operating hours
10. Accessible housing/Wheelchair user dwellings (Minimum number of M4(3))
11. Acoustic report for mechanical plant
12. Compliance with Fire Strategy
13. Tree Protection Plan
14. Arboricultural Method Statement
15. No works to trees and shrubs within bird nesting season
16. Detailed drawings for landscaping, public realm, play equipment and highway works
17. Landscape and public realm management plan
18. Details of external materials/sample panels
19. Living roofs and green wall
20. Details of PV panels
21. Lighting
22. Cycle parking overall provision
23. Accessible long stay cycle parking
24. Commercial cycle parking
25. Podium open space provision
26. Electrical vehicle charging points
27. Car parking management plan
28. Restriction on podium car parking just by Scott House residents
29. Delivery and servicing plan
30. NRMM emissions compliance
31. Secured by Design accreditation
32. Secured by Design certification
33. Secured by Design commercial certification
34. SuDS details
35. Flood Risk Technical Note
36. SuDS verification
37. Levels
38. Construction Logistics Plan
39. Construction Environmental Management Plan
40. Demolition Method Statement

41. Site Waste Management Plan
42. Whole Life Carbon Assessment
43. Water efficiency
44. Energy strategy compliance
45. Energy technical note
46. Energy verification/performance certificates
47. Whole Life-cycle Carbon technical report
48. Circular Economy post completion report
49. Urban Greening Factor
50. Biodiversity enhancements
51. Contamination and remediation
52. Previously unidentified contamination
53. Archaeology
54. Restriction on construction within 5m of water main
55. Requirement for piling method statement
56. Acoustic screen
57. Gating of podium and communal squares
58. Hours for gating eastern courtyard
59. Dropped kerb and tactile paving improvements

3. Executive Summary

- 3.1. The London Borough of Enfield (LBE) Housing Team is seeking to deliver 3,500 new homes across the Borough over the next 10 years. The overarching aspiration of the programme is to create high-quality homes in well-connected neighbourhoods, to sustain strong and healthy communities. This includes delivering several housing renewal and estate regeneration schemes across the Borough.
- 3.2. Upton and Raynham has been identified as a key site forming part of LBE's development programme, with a view to extend housing provision on the site to replace the existing Beck House, which is no longer fit for purpose with a greater number of high quality homes, including a significant uplift in affordable housing. Through extensive pre-application discussions with the Local Planning Authority (LPA), inclusive of a review of the development proposal at the Enfield Place and Design Quality Panel, the applicant has developed a comprehensive masterplan and vision for the entire site, which offers a unique opportunity to increase the number of affordable homes whilst better integrating the site into the surrounding community and improving the sense of neighbourhood safety.
- 3.3. The proposal seeks to extend the provision of housing by making more efficient use of land and providing a high quality of homes where the existing building no longer meets the standard of housing that Enfield strives to provide. The replacement of Beck House and development of several infill blocks will allow for the provision of 134 new homes and complete refurbishment of the landscaping and public realm to make better use of the site's open space assets. Enhancements to amenity and overall design will help to address issues of security on the site.
- 3.4. The development proposes that 69% of the gross number of new housing units will be affordable, split across London Affordable Rent and shared ownership tenures.

- 3.5. The applicant has set out in detail the impacts to neighbouring residential amenity and pre-application discussions have shaped the development to the extent that officers are satisfied the development will result in no unacceptable adverse impact to neighbouring residential amenity.
- 3.6. The primary public benefits of the scheme can be summarised as follows:
- Optimising the site – making effective use of a brownfield site
 - Making a significant contribution to the Borough’s housing target including the delivery of 53 family-sized homes
 - Delivery of 92 affordable homes, comprising 69% of the total gross housing offer
 - Inclusion of a community hall in the lower ground floor of Scott House
 - New, modern and well-located accommodation for commercial units
 - Complete overhaul of landscaping and public realm throughout the site to provide functional outdoor amenity space, private garden spaces and several play areas
 - Greener routes and strategic cycle and pedestrian connections
 - On-site biodiversity enhancements
 - More than a doubling of the numbers of trees that currently exist on the site
 - S106 contributions towards improvements to local area play provision
 - Rationalisation of the Scott House entrance with accessible and attractive access
 - Achieving net zero carbon emissions through connection to the Enfield District Heat Network and offset contributions, among other measures
 - Integration of on-site sustainable urban drainage measures

4. Site and Surroundings

- 4.1. The Site covers an area of 1.43 hectares and currently includes two buildings: Beck House to the east and Scott House located centrally within the Site.
- 4.2. Beck House was built in the 1965 and is a ‘brutalist’ building of between two and four storeys running parallel with Upton Road. The three-storey section to the west contains 12 vacant flats with an access balcony running the full length of the second and third floors. The central four-storey section consists of shops to the ground floor and vacant 1-bedroom flats to the second and third floors. The fourth floor is an open roof / terrace area. This section of Beck House is owned by the Council and is in a state of substantial disrepair, with the flats unoccupied and boarded up. The two ground floor retail units are currently in use as a convenience store and hot-food takeaway respectively. There is a large over-sailing canopy to the shops and garages, which makes up the main Upton Road frontage.
- 4.3. The eastern part of Beck House drops to two-storeys and is of a staggered form. Until recently, this part of the building was owned by Riverside Housing Association and provided 34 bedsit (studio) flats as supported housing for single or childless couples ages 18 to 64 with support issues or those at serious risk of becoming homeless. These flats were more recently used as temporary emergency accommodation for rough sleepers. However, the building is now vacant with this use being re-provided elsewhere in the Borough by the Council. There is an area of underutilised green space and car parking located between the eastern park of Beck House and Upton Road to the south.

- 4.4. Scott House, originally named Angel House and also built in 1965, is an 18-storey residential block comprised of 101 social rent flats owned by the Council. The land immediately around the base of the tower has been excavated to provide parking and garages approximately two metres below the main pedestrian access to the block via a raised walkway to the east at upper ground floor level. The garages are no longer used for parking by residents. To the west of Scott House, beyond the sunken car park, is an undeveloped area of grass with paths providing pedestrian access to Raynham Road. To the north of Scott House is a pedestrian ramp that is owned and operated by Transport for London (TfL), which provides pedestrian and cycle access over the North Circular Road to Kings /Aberdeen Road to the north.
- 4.5. Given its central location within the Site, Scott House divides the western and eastern halves, disrupting legibility to and around the Site. It has a dominating presence within the immediate townscape where buildings typically do not exceed four-storeys in height.
- 4.6. The buildings on-site are interspersed with areas of hard and soft landscape of varying quality including areas of underutilised grassland and scattered trees with shrub and tree planting along the Site boundary to the north adjacent to the North Circular Road. Large areas of the Site are currently given over to roadways, footpaths and vehicle parking.
- 4.7. The surrounding context to the south and east is predominantly low rise, early 20th century housing with a coherent street pattern in terraced rows or pairs. Raynham Primary School and Nursery, which incorporates a 3-storey Victorian school building, is located immediately to the south of the site. The western edge of the site along Raynham Road leads to Fore Street, the neighbourhood's main commercial and social artery and district centre. Directly to the west of the application boundary is the Angel Community Centre, a 1960s two storey building, situated opposite a terrace of two storey pitched roof early 20th century houses and adjacent to a public car parking area.

5. Proposal

- 5.1. The application is for the demolition of Beck House and garages on Upton Road and construction of 134 residential dwellings (Use Class C3) and up to 188 sqm flexible commercial floorspace (Use Class E) comprising buildings up to 7 storeys in height, and the change of use of ancillary garages to part of the lower ground floor of Scott House (Use Class C3) to provide up to 70 sqm community hall (Use Class F2(b)), 45 sqm ancillary management office (Use Class C3), podium deck, along with associated means of access and highways works; car and cycle parking; hard and soft landscaping; play space and public, communal, and private realm; refuse storage; ancillary plant and structures; and works to Scott House to create new access at lower ground and ground floor levels.
- 5.2. As stated above, the subject proposal includes the demolition of Beck House, however, due to ongoing issues of anti-social behaviour and related concerns raised by neighbours, the applicant has taken steps to separately and concurrently pursue an application for prior approval for the demolition of Beck House under Schedule 2, part 11, Class B of the Town and Country Planning (General Permitted Development) (England) Order 2015. It has been determined that a prior approval is not required and Beck House could be demolished under permitted development rights. As represented in the description of development, this application presently includes the demolition of Beck House as part of the

proposal. The applicant could implement the demolition pursuant to the determination of prior approval or this full planning application, if approved.

- 5.3. It should be noted also that the unused garages to the east of Beck House were demolished by the Council during the course of this planning application.
- 5.4. New residential blocks are proposed to form a courtyard arrangement on the location of the existing Beck House, surface parking and grass areas in the eastern portion of the site. Additional blocks will infill the northern boundary of the site parallel to the North Circular Road, and an additional t-shaped building will be constructed on an existing grassed area to the west of Scott House. In total, the application proposes 134 new homes and increases density from 102.8 dwellings per hectare (dph) to 164.3 dph. Scott House, the existing 18-story residential building in the centre of the Application Site is retained.
- 5.5. The proposal includes the provision of 134 new homes at the Application Site. Of the 134 units, 92 homes, or 69% of units, are proposed to be affordable and delivered on-site. This comprises 27 shared ownership homes and 65 London Affordable Rent homes. 40% of new homes are proposed to be family-sized, 3- and 4-bedroom units.
- 5.6. The existing 168 sqm of commercial floorspace comprising two units on the ground floor of Beck House will be reprovided with 188sqm of Use Class E commercial floorspace in blocks E1 and E2 to look onto the new public square on the eastern side of Scott House.
- 5.7. The existing lower ground floor of Scott House, which contains unused parking, will be converted to up to 70sqm of community hall space (Use Class F2(b)) and 45sqm for an ancillary management office (Use Class C3). The principal entrance to Scott House will be relocated from the ramped entrance on the upper ground floor to an entrance on the lower ground floor, accessible by a sculptural set of stairs, integrating landscaping and play features.
- 5.8. The proposed blocks predominantly range in height between two and five storeys, with one block E1 up to six storeys and G1 up to seven storeys, both along the North Circular Road and nearest the 18-storey Scott House. Heights are arranged to step down from the centre of the site to the east and west, and to the south, in reflection of adjacent heights.
- 5.9. The development will deliver 7,450 sqm of open space to include 1,139 sqm of play space. The existing open space amenity is improved with new trees, soft planting, furniture, play features, suitable surfacing in to the open spaces, paths and areas of public realm. The application includes biodiversity enhancements and urban drainage measures that are integrated into the landscaping.
- 5.10. Poor existing pedestrian conditions are to be improved by regularising the path through the site to one, more legible route that will serve as pedestrian, bicycle and controlled service access. The scheme proposals to incorporate an east-west green link through the site, connecting Upton Road and Raynham Road, and contributing to a strategic cycle connection between Silver Street and Meridian Water rail stations. Cycle parking will be provided in line with regulations.
- 5.11. The new housing is proposed to be car-free, which will be reinforced by a S106 contribution towards consultation for a Controlled Parking Zone. Vehicular

access to the site is not proposed to be altered significantly from the current condition. No vehicular through-access is permitted, except for service vehicles, and driving up to the site is possible via Raynham Road, Upton Road and Woolmer Road.

- 5.12. The site is proposed to minimise of greenhouse gas emissions through several measures, including connection to Enfield’s District Heat Network.

6. Relevant Planning Decisions

Application Description	Reference	Status
<i>Scott House</i>		
Installation of 10 x bin enclosures (metroSTOR) over the existing concrete slab to lower ground parking level.	21/00385/RE4	Approved 27.07.21
Installation of external cladding, insulation and rendered finish to all elevations.	P12-03169PLA	Approved 13.03.13
Replacement windows to elevations of block.	P12-02505PLA	Approved 11.03.13
Non material amendment to approval under ref:P12-02505PLA to allow replacement windows to elevations of block at Scott House, Woolmer Road N18 2JH.	P13-00628NMA	Approved 22.05.13
<i>Beck House</i>		
Installation of a 5G telecom's H3G Phase 8, 20m high monopole with cabinets at base and associated works.	21/02954/PAT	Refused 22.09.21
Replacement windows to block.	P12-02506PLA	Approved 11.03.13
Change of use of ground floor to hot food takeaway (A3).	TP/00/1620	Approved 12.01.01
Replacement of all windows.	LDC/00/0218	Approved 07.09.00
<i>North Circular Road</i>		
Internally illuminated poster panel.	AD/01/0115	Refused upon Appeal 15.10.01

Prior approval for demolition of Beck House 22/00320/PADE Prior approval not required 24.02.22

7. Consultations

Pre-Application Consultation

- 7.1. The pre-application consultation was carried out in September and October 2021, before the application was submitted in November 2021. The consultation comprised two consultation events at the Angel Community Centre on the 16th and 17th September, an online public exhibition on the 20th September and an online engagement that ran from 17th September to 12th October. 280 newsletters and feedback forms were distributed to local residents and the wider community in September 2021. The applicant team also met with REACT on 26 October.
- 7.2. The in-person consultation events generated 21 responses and the online survey resulted in 607 people who voted, 3670 questions answered, 137 unique feedback emails received and 220 pieces of written feedback. The submitted Statement of Community Involvement describes the response as conveying significant level of support for the proposal, in particular for the demolition of Beck House which people see as attracting much of the antisocial behaviour and crime in the area. Respondents also highlighted support for renewal of the wider area, affordable housing and the newly landscaped spaces. Concerns were raised about infrastructure impact of the new homes, parking, construction, air quality, and anti-social behaviour.

Enfield Place and Design Quality Panel (DRP):

7.3. The proposed development was brought to the Enfield Place and Design Quality Panel (hereby referred to as DRP) 10 June 2021. A summary of the conclusions made, along with officer comment as to the degree to which the applicant has addressed DRP conclusions is outlined below:

- “The panel commends the integration of the landscape and architectural teams which appears to be creating a more cohesive proposal.”
- “Landscape proposals successfully pick up on the strategic connectivity and green / blue infrastructure objectives in the wider area. However, there is a lack of detail in how these are translated into the detailed proposals throughout the site.”

Officer comment: The applicant has developed a comprehensive and detailed blue and green landscape strategy. The landscape approach is underpinned by a strategic connection between Raynham Road from the west and Upton Road and Woolmer Road to the east and south. The strengthening of this route through the site better integrates it into the surrounding street network and reinforces connections east to Meridian Water and west to Fore Street – integrating the emerging ambition for a sustainable Green Loop through the site. The route is only for pedestrians and cyclists. The Landscape Plan and Planting Plan demonstrate a connection that is planted with trees and soft planting, as well as drainage features incorporated into the landscaping, such as rain gardens and bioswales. The site plan includes several areas of purposeful open space and play space. Officers are satisfied that the proposal addresses the strategic objectives in the detailed design of the site.

- “The sunken landscaped square at Scott House is a positive feature”
- “Generally, the architectural and landscape proposals to the north circular are underdeveloped. The panel encourage the design team to explore landscape and built solutions which avoid this being a monolithic development that turns away from the north circular.”

Officer comment: A great deal of attention has been paid by design officers and the applicant’s design team to animating the elevations fronting the North Circular Road to ensure that the buildings are perceived as a high quality and dynamic element along this major road. Roofs have been angled and varied in height, facades have been set back and articulated, windows have been designed with sufficient reveal depths and a language of brick detailing is used to add texture to planes. Through the combined use of all of these methods, officers are satisfied that the feeling of a ‘monolithic’ front along the North Circular is avoided.

- “The scheme is proposing a large number of dual aspect through units which is supported by the panel. The dual aspect single bedroom flats overlooking the eastern courtyard are working well.”
- “The eight storey block across from Scott House and fronting the square seems underdeveloped compared to the other parts of the site. This proposal is creating overshadowing issues to the corner flats adjacent to it in northern block.

Officer comment: The building facing Scott House has been reduced in height from eight storeys to five storeys and distributed the massing to address overshadowing.

- “More work is needed on the western courtyard blocks. There are issues with privacy, access, the relationship to the school and an underused strip of land which has not been allocated to public or private use.”

Officer comment: The massing has been revised to correspond more effectively to the school, reducing it in height from 4 to 3 storeys at the boundary. The buffer strip has been removed from the scheme. This has been replaced with split level homes on the ground floor which have access to the new landscaped podium. The block has been redesigned to include more flatted homes (instead of three-storey homes as presented a DRP). This has resulted in fewer homes at ground floor and has rationalised access via a central core and decks.

- “The access to the eastern courtyard should not be mediated solely using fencing and gates. The panel ask the design team to explore options where arches or other architectural features integral to the building are used as the security line. There is a concern that the development could be perceived as a gated community.”

Officer comment: The design of the entrances to the eastern courtyard does include arches through each of the access points. The gate line has been recessed into the courtyard so the gates do not dominate the entrance points on Upton Road and are more subtle. As is further explained in sections below, it is proposed that the gates will be open during daytime hours and closed at night.

Public Consultation

- 7.4. Public consultation as a result of this planning application involved notification letters being sent to 462 neighbouring properties (both within the estate and homes adjoining) 14 December 2021, a press advert in the Enfield Independent was published 22 December 2021 and 5 site notices were erected 15 December 2021.
- 7.5. As a result of public consultation, one representation was received, and a summary of reasons for comment is below:
- General dislike of proposal
 - Concern about the ability of the Scott House structure to withstand works to lower floors.
- 7.6. Officer response: The above concern is a Building Control matter rather than a matter subject to review as part of the current planning application. It is worth noting, however, that technical surveys of Scott House will be required to be carried out prior to works. The structural works at Scott House that are required to effectuate this proposal are limited to small changes to localised door openings. No major structural work at Scott House is necessary.

Statutory and Non-Statutory Consultees

- 7.7. Education: No comment notwithstanding the applicant and the LBE Education have agreed, as outlined, that the applicant will make a financial contribution (of

the amount of £339,690) toward education to be secured within the shadow S106 Agreement.

- 7.8. Environmental Health: Environmental Health does not object to the application for planning permission and finds there is no significant adverse impact that cannot be addressed through mitigation measures that have been conditioned.

Construction dust is likely to be an issue for existing residents and the air quality assessment puts forward suitable measures to control dust; these measures must be implemented to control dust during construction and demolition.

A series of conditions related to emission standards for all Non-Road Mobile Machinery (NRMM), contamination and acoustics associated with the mechanical plant are recommended and these are included in the list of conditions set out above.

- 7.9. Traffic and Transportation: Overall, the proposed approach to traffic and transportation matters is acceptable, particularly the range of mitigation measures proposed, and meets relevant policy requirements. A series of conditions is recommended to address management of access through Raynham Road by Traffic Management Order, lighting, secure cycle storage and a Construction Logistics Plan. All matters will be addressed either through the conditions listed above or within the Shadow S106 Agreement.

- 7.10. Transport for London: TfL is generally supportive of the proposal with the inclusion of conditions that address long-stay cycle storage, the requirement for a detailed Construction Logistics Plan, full cycle parking, a detailed Travel Plan and an Arboricultural Method Statement as trees are proposed on TfL land. All matters raised will be addressed through the conditions listed above or within the shadow S106 Agreement.

- 7.11. SuDS Highways: The officers raised fundamental questions with respect to the Flood Risk Assessment and flood model used and, during the course of application review, have been given sufficient clarification to support the flood mitigation with condition. Officers are generally supportive of the SuDS approach but there are residual matters that can be addressed through conditions, which are included in the list set out above. The full position is set out within the relevant section of this report.

- 7.12. Environment Agency: Following initial consultation, the Environment Agency raised an objection to the application because, according to the EA's records, this application may involve works within 8 metres of a culverted watercourse. The applicant has since submitted evidence in the form of sewer records indicating that the development is outside of the 8-metre range and the EA have confirmed they have withdrawn this element of their objection. The EA additionally requested to review the applicant's flood model to assess flooding risk. The applicant provided the information and received acknowledgement from the EA that the flood model used is the most recent model recognised by the EA. Notwithstanding this, the EA has not yet formally responded to the subsequent submission of information and has not removed this objection. A response is expected imminently and Members will be updated at the meeting. This report resolves to grant approval, subject to no objection from the EA.

- 7.13. Health authority: the NHS London Healthy Urban Development Unit does not object to the proposal subject to a financial contribution (of the amount of £74,920) toward primary healthcare to be secured within the S106 Agreement.
- 7.14. Historic England (GLAAS): Advise that the site lies in an area of archaeological interest and that the development could cause harm to archaeological remains and field evaluation is needed to determine appropriate mitigation. Accordingly, A two-stage condition is advised, firstly, evaluation to clarify the nature and extent of surviving remains, followed, if necessary, by a full investigation.
- 7.15. Natural England: On receipt of a Habitats Regulations Assessment, to understand the development's impacts on the Epping Forest Special Area of Conservation (SAC), Natural England have confirmed no objection to the development concluding the identified impacts on SAC and Lee Valley SPA and Ramsar can be appropriately mitigated with measures secured via planning obligation. The shadow S106 will secure these measures.
- 7.16. Metropolitan Police (Secured by Design): The Metropolitan Police Service Designing out Crime Unit supports the proposal subject to appropriate conditions and informatives. Conditions are included in the list above.
- 7.17. Thames Water: On the basis of information provided, Thames Water would advise that with regard to surface water network infrastructure capacity/foul water sewerage network infrastructure capacity, they would not have any objection to the planning application subject to a series of appropriate conditions/informatives. Conditions as recommended are included in the list above.

8. Relevant Policy

National Planning Policy Framework 2021

- 8.1. The National Planning Policy Framework (NPPF) introduces a presumption in favour of sustainable development. In this respect, sustainable development is identified as having three dimensions - an economic role, a social role and an environmental role. For decision taking, this presumption in favour of sustainable development means:
- a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
- b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and
- c) an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

- 8.2. The NPPF recognizes that planning law requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise. The NPPF does not change the statutory status of the development plan as the starting point for decision making.
- 8.3. In relation to achieving appropriate densities paragraph 124 of the NPPF notes that planning policies and decisions should support development that makes efficient use of land, whilst taking into account:
- a) the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;
 - b) local market conditions and viability;
 - c) the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;
 - d) the desirability of maintaining an area’s prevailing character and setting (including residential gardens), or of promoting regeneration and change; and
 - e) the importance of securing well-designed, attractive and healthy places.
- 8.4. Paragraph 48 of the NPPF details when weight may be given to relevant emerging plans. This guidance states that the stage of preparation, the extent to which there are unresolved objections and the degree of consistency of relevant policies to the Framework are relevant.
- 8.5. The National Planning Policy Framework sets out at Para 11 a presumption in favour of sustainable development. For decision taking this means:
- “(c) approving development proposals that accord with an up-to-date development plan without delay; or
 - (d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date (8), granting permission unless:
 - (i) the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed); or
 - (ii) any adverse impacts of so doing would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole.
- 8.6. Footnote (8) referenced here advises “This includes, for applications involving the provision of housing, situations where the local planning authority cannot demonstrate a 5 year supply of deliverable housing sites (with the appropriate buffer, as set out in paragraph 73); or where the Housing Delivery Test indicates that the delivery of housing was substantially below (less than 75% of) the housing requirement over the previous 3 years.”
- 8.7. The Council’s recent housing delivery has been below our increasing housing targets. This has translated into the Council being required to prepare a Housing

Action Plan in 2019 and more recently being placed in the “presumption in favour of sustainable development category” by the Government through its Housing Delivery Test.

- 8.8. The Housing Delivery Test (HDT) is an annual measurement of housing delivery introduced by the government through the National Planning Policy Framework (NPPF). It measures the performance of local authorities by comparing the completion of net additional homes in the previous three years to the housing targets adopted by local authorities for that period.
- 8.9. Local authorities that fail to meet 95% of their housing targets need to prepare a Housing Action Plan to assess the causes of under delivery and identify actions to increase delivery in future years. Local authorities failing to meet 85% of their housing targets are required to add 20% to their five-year supply of deliverable housing sites targets by moving forward that 20% from later stages of the Local Plan period. Local authorities failing to meet 75% of their housing targets in the preceding 3 years are placed in a category of “presumption in favour of sustainable development.
- 8.10. In 2019, Enfield met 77% of the 2,394 homes target for the preceding three-year period (2016/17, 2017/18, 2018/19), delivering 1,839 homes. In 2020 Enfield delivered 56% of the 2,328 homes target. In 2021, Enfield delivered 1777 of the 2650 homes required, a rate of 67%. The consequence of this is that Enfield is within the “presumption in favour of sustainable development” category.
- 8.11. This is referred to as the “tilted balance” and the National Planning Policy Framework (NPPF) states that for decision-taking this means granting permission unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole – which also includes the Development Plan. Under the NPPF paragraph 11(d) the most important development plan policies for the application are deemed to be ‘out of date’. However, the fact that a policy is considered out of date does not mean it can be disregarded, but it means that less weight can be applied to it, and applications for new homes should be considered with more weight (tilted) by planning committee. The level of weight given is a matter of planning judgement and the statutory test continues to apply, that the decision should be, as section 38(6) of the Planning and Compulsory Purchase Act 2004 requires, in accordance with the development plan unless material considerations indicate otherwise.
- 8.12. The London Plan 2021
- | | |
|-----|--|
| 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 |
| SD1 | Opportunity Areas |
| 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
D14	Noise
E11	Skills and Opportunities for All
H1	Increasing Housing Supply (*):
H4	Delivering Affordable Housing
H5	Threshold Approach to Applications
H6	Affordable Housing Tenure
H10	Housing Size Mix
S1	Developing London's social infrastructure
S3	Education and childcare facilities
S4	Play and Informal Recreation
HC1	Heritage Conservation and Growth
G1	Green Infrastructure
G4	Open Space
G5	Urban Greening
G6	Biodiversity and Access to Nature
G7	Trees and Woodland
SI1	Improving Air Quality
SI2	Minimising Greenhouse Gas Emissions
SI3	Energy Infrastructure
SI4	Managing Heat Risk
SI5	Water Infrastructure
SI7	Reducing Waste and Supporting the Circular Economy
SI 8	Waste capacity and net waste self-sufficiency
SI12	Flood Risk Management
SI13	Sustainable Drainage
SI17	Protecting and enhancing London's waterways
T1	Strategic Approach to Transport
T2	Healthy Streets
T3	Transport Capacity, Connectivity and Safeguarding
T4	Assessing and Mitigating Transport Impacts
T5	Cycling
T6	Car Parking
T6.1	Residential Parking
T7	Deliveries, Servicing and Construction
T9	Funding Transport Infrastructure through Planning
DF1	Delivery of the Plan and Planning Obligations

8.13. Mayoral Supplementary Guidance

- 8.14. Play and Informal Recreation (September 2012)
Provides guidance to Local Authorities and development to estimate the potential child yield from a development, and the resulting requirements for play space provision.
- 8.15. Sustainable Design and Construction (April 2014)
The Sustainable Design and Construction (SPG) seeks to design and construct new development in ways that contribute to sustainable development.
- 8.16. The Control of Dust and Emissions during Construction and Demolition (July 2014) The aim of this supplementary planning guidance (SPG) is to reduce

emissions of dust, PM10 and PM2.5 from construction and demolition activities in London.

- 8.17. Accessible London: Achieving an Inclusive Environment (October 2014)
The strategy sets out to provide detailed advice and guidance on the policies in the London Plan in relation to achieving an inclusive environment.
- 8.18. Housing (March 2016)
The housing SPG provides revised guidance on how to implement the housing policies in the London Plan.
- 8.19. Affordable Housing and Viability (August 2017)
Set's out the Mayor's policies for assessing and delivering affordable housing and estate renewal.
- 8.20. Better Homes for Local People, The Mayor's Good Practice Guide to Estate Regeneration
Sets out the Mayor's policies for Estate Regeneration.

8.21. Local Plan – Core Strategy

Core Policy 3	Affordable Housing
Core Policy 4	Housing quality
Core Policy 5	Housing types
Core Policy 9	Supporting Community Cohesion
Core Policy16	Taking part in economic success and improving skills
Core Policy 20	Sustainable Energy use and energy infrastructure
Core Policy 21	Delivering sustainable water supply, drainage and 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 34	Parks, Playing Fields and Other Open Spaces
Core Policy 36	Biodiversity
Core Policy 39	Edmonton

8.22. Local Plan – Development Management Document

- DMD1: Affordable Housing on Sites Capable of Housing 10 Units or More
- DMD3: Providing a Mix of Different Sized Homes
- DMD6: Residential Character
- DMD8: General Standards for New Residential Development
- DMD9: Amenity Space
- DMD10: Distancing
- DMD37: Achieving High Quality and Design-Led Development
- DMD38: Design Process
- DMD43: Tall Buildings
- DMD44: Conserving and Enhancing Heritage Assets

DMD45: Parking Standards and Layout
 DMD47: New Road, Access and Servicing
 DMD48: Transport Assessments
 DMD49: Sustainable Design and Construction Statements
 DMD50: Environmental Assessments Method
 DMD51: Energy Efficiency Standards
 DMD52: Decentralized energy networks
 DMD53: Low and Zero Carbon Technology
 DMD55: Use of Roofspace/ Vertical Surfaces
 DMD56: Heating and Cooling
 DMD57: Responsible Sourcing of Materials, Waste Minimisation and Green Procurement
 DMD58: Water Efficiency
 DMD59: Avoiding and Reducing Flood Risk
 DND60: Assessing Flood Risk
 DMD61: Managing surface water
 DMD62: Flood Control and Mitigation Measures
 DMD64: Pollution Control and Assessment
 DMD65: Air Quality
 DMD68: Noise
 DMD69: Light Pollution
 DMD70: Water Quality
 DMD71: Protection and Enhancement of Open Space
 DMD72: Open Space Provision
 DMD73: Child Play Space
 DMD78: Nature conservation
 DMD79: Ecological Enhancements
 DMD80: Trees on development sites
 DMD81: Landscaping

8.23. Other Material Considerations

Enfield Climate Action Plan (2020)
 Enfield Housing and Growth Strategy (2020)
 Enfield Intermediate Housing Policy (2020)
 Enfield Biodiversity Action Plan
 Enfield Characterisation Study (2011)
 Enfield Local Heritage List (May 2018)
 Enfield S106 SPD (2016)
 Enfield Decentralised Energy Network Technical Specification SPD (2015)
 Making Enfield: Enfield Heritage Strategy 2019-2024 SPD (2019)
 The Setting of Heritage Assets – Historic Environment Good Practice Advice in Planning: 3, Historic England (2017)
 London Councils: Air Quality and Planning Guidance (2007)
 TfL London Cycle Design Standards (2014)
 GLA: Shaping Neighbourhoods: Play and Informal Recreation SPG (2012)
 GLA: Shaping Neighbourhoods: Character and Context SPG (2014)
 GLA: The Control of Dust and Emissions during Construction and Demolition SPG (2014)
 GLA: London Sustainable Design and Construction SPG (2014)
 GLA: Accessible London: Achieving an Inclusive Environment SPG (2014)
 GLA: Social Infrastructure SPG (2015)
 GLA: Housing SPG (2016)
 GLA: Homes for Londoners: Affordable Housing and Viability SPG (2017)
 Mayor's Transport Strategy (2018)

GLA Threshold Approach to Affordable Housing on Public Land (2018)
Healthy Streets for London (2017)
Manual for Streets 1 & 2, Inclusive Mobility (2005)
National Planning Practice Guidance
National Design Guide (2019)

8.24. Enfield Draft New Local Plan and Draft Proposals Map

8.25. The Council consulted on Enfield Towards a New Local Plan 2036 “Issues and Options” (Regulation 18) (December 2018) in 2018/19. This document represented a direction of travel and the draft policies within it will be shaped through feedback from key stakeholders. As such, it has relatively little weight in the decision-making process. Nevertheless, it is worth noting the emerging policy H2 (Affordable housing) which sets out a strategic target that 50% additional housing delivered across the borough throughout the life of the plan will be affordable; policy H4 (Housing mix) which identifies the borough’s needs for homes of different sizes and tenures; and H5 (Private rented sector and build-to-rent) which sets out that the Council will seek to maximise the supply of housing in the borough by, amongst other things, supporting proposals for standalone build to rent developments.

8.26. As the emerging Local Plan progresses through the plan-making process, the draft policies within it will gain increasing weight, but at this stage it has relatively little weight in the decision-making process.

8.27. Key local emerging policies from the plan are listed below:

Policy DM SE2 – Sustainable design and construction
Policy DM SE4 – Reducing energy demand
Policy DM SE5 – Greenhouse gas emissions and low carbon energy supply
Policy DM SE7 – Climate change adaptation and managing heat risk
Policy DM SE8 – Managing flood risk
Policy DM SE10 – Sustainable drainage systems
Strategic Policy SPBG3 – Biodiversity net gain, rewilding and offsetting
Policy DM BG8 – Urban greening and biophilic principles
Policy DM DE1 – Delivering a well-designed, high-quality and resilient environment
Policy DM DE2 – Design process and design review panel
Policy DM DE6 – Tall buildings
Policy DM DE7 – Creating liveable, inclusive and quality public realm
Policy DM DE10 Conserving and enhancing heritage assets
Policy DM DE11 – Landscape design
Policy DM DE13 – Housing standards and design
Policy DM H2 – Affordable housing
Policy DM H3 – Housing mix and type
Policy DM T2 – Making active travel the natural choice
Strategic Policy SP D1 – Securing contributions to mitigate the impact of development

ANALYSIS

9. Main Planning Issues

9.1. The main planning issues raised by the Proposed Development are:

- Principle of Development
- Housing Need and Delivery
- Design
- Residential Quality and Amenity
- Open Space, Play Space, Landscaping and Trees
- Biodiversity and Ecology
- Heritage and Archaeology
- Transport, Access and Parking
- Sustainability and Climate Change
- Environmental Health
- Flood Risk and Drainage
- Community Infrastructure Levy and S106

10. Principle of Development

- 10.1. Enfield Housing's Trajectory Report 2019 shows that during the preceding 7-years, the Borough had delivered a total of 3,710 homes which equates to around 530 homes per annum. Enfield's 2019 Housing Action Plan recognises that the construction of more affordable high-quality homes is a clear priority, with only 51% of approvals over the preceding 3-years actually being implemented. A Local Housing Need Assessment (LHNA)² was undertaken in 2020 and identifies an annual housing need of 1,744 homes across the Borough based on a cap of 40% above the London Plan annual target of 1,246 homes, in line with the Government's standard methodology.
- 10.2. The Council's Local Plan Issues & Options (Regulation 18) document (2021) acknowledges the sheer scale of the growth challenge for the Council and the Council's Housing and Growth Strategy 2020-2030 aims to deliver the London Plan targets for the borough.
- 10.3. Enfield is a celebrated green borough with close to 40% of the land currently designated as Green Belt or Metropolitan Open Land and a further 400 hectares providing critical industrial land that serves the capital and wider south-east growth corridors. These land designations underpin the need to optimise development on brownfield land. London Plan Policy H1 highlights the urgency to optimise housing provision on brownfield sites, specifically identifying opportunity for housing intensification and development on publicly owned sites. The Application Site constitutes previously developed land and therefore the principle of developing the site for housing to support the Borough's housing delivery target is supported.
- 10.4. The proposal accords with London Plan Policy GG2, which advocates making the best use of land and building to suitable densities on well-connected sites. The proposal seeks to extend the provision of housing by making more efficient use of land and providing a high quality of homes where the existing building no longer presents an optimal housing offer. In this respect, the aim to strengthen the provision of housing on a site that is already residential, and is within a residential setting, is justified.

- 10.5. The emerging Local Plan includes the Application Site within the Angel Edmonton Urban Placemaking Area, led by draft Strategic Policy SP PL4: Angel Edmonton, which sets out the aspirations for the area, including an offer of a range of housing typologies and the potential for denser forms of residential growth. Additional objectives include improved connectivity, drainage enhancements and a more suitable environment along the North Circular Road. The Application Site forms the majority of draft Site Allocation 17 in the draft Policies Map, which is in consultation alongside the draft Local Plan. The draft Site Allocation estimates a housing capacity of 198 homes for the entire Site Allocation; the timeframe for delivery is in five to ten years. Although limited in weight, the draft allocation supports the principle of increased residential provision at this site – and the 134 units proposed as part of this application appear proportionate to the area of the Site Allocation that the Application Site comprises.
- 10.6. The Core Strategy (Core Policy 3) and DMD (Policy DMD1) seek a borough-wide target of 40% affordable housing in new developments, applicable on sites capable of accommodating ten or more dwellings.
- 10.7. London Plan Policy H4 outlines the strategic target of 50% of all new homes delivered across London to be genuinely affordable and outlines specific measures to aid achieving this aim. Policy H2 of the New Enfield Local Plan, whilst holding limited weight, mirrors the New London Plan in outlining that the Council will seek the maximum deliverable amount of affordable housing on development sites and that the Council will set a strategic target of 50% of new housing to be affordable.
- 10.8. The proposed development will provide 134 new homes. Of these, 92 are proposed to be affordable, representing 69% of all new housing units, exceeding the London Plan 50% target. As part of the affordable housing offer, 65 (71%) homes are proposed to be London Affordable Rent and 27 (29%) are proposed as shared ownership. 42 homes will be private sale. The proposed development therefore supports LBE's ambition to build a range of affordable homes to support Enfield residents currently in need as well as those seeking access to the property market.

Commercial floorspace

- 10.9. The application additionally proposes commercial and community facility floorspace.
- 10.10. Policy DMD 25 sets out the policy requirements for locations for new retail leisure and office developments. The policy directs development of shopping facilities to local centres and parades as designed within the Policies Map. Shops outside these centres should be within 300 metres from a primary shopping area only where no appropriate sites are available in the centre.
- 10.11. There are presently two commercial units within the Application Site totalling 168 sqm: a convenience shop and hot food take-away, both on the ground floor of Beck House.
- 10.12. The application proposes three Use Class E spaces fronting the new central square, totalling 188 sqm. The total amount of commercial floorspace on the site is proposed to increase by 20 sqm – relative to the increase in residential floorspace, this uplift is modest. In essence, the proposal reinstates the existing

commercial provision, which has a particular and established function on the Application Site. Given the commercial units are within 300 metres of Fore Street, the proposal for commercial floorspace is supported.

- 10.13. It should be highlighted that the permission will enable Use Class E uses, which include shops, food and drink establishments (excluding hot food takeaway), services, indoor sports, medical services, creche or nursery and offices. These uses, although within the same use group, vary in nature and character. Certain uses, such as cafes or restaurants, may result in impacts to adjacent residents. For this reason, conditions are recommended that no external equipment may be affixed to the building without consent and commercial hours are limited to between 8:00 am and 11:00 pm. A condition should also restrict the conversion of Class E to residential use.
- 10.14. The application does not make clear what sub-uses within Use Class E are intended for the commercial spaces. As in the transportation section of this report, a condition is recommended to secure a detailed Delivery and Servicing Plan that will include the specific use(s) of the commercial space.

Community floorspace

- 10.15. The application proposes to convert the existing lower ground floor of Scott House, which presently houses unused parking garages, to a 70sqm community hall (Use Class F2(b)). Policy DMD 16 sets out criteria in relation to the provision of community spaces: demonstration of community need, making effective use of the space with flexibility and opportunity for multiple users, easily accessible, including for physically impaired users, does not impact amenity and does not have traffic impacts. The applicant has addressed concern with respect to sufficient amenity for the space by including a bathroom. The provision of a community hall at this location is accepted.

Principle of development conclusions

- 10.16. The development has no land-use implications. It proposes an intensification of the established residential (Use Class C3) use on previously developed land that has been identified for additional housing growth. It exceeds LBE's adopted affordable housing target of 40% and the London Plan's target of 50% with an offer of 69% affordable units. Accordingly, the principle of additional housing development on this site is supported.

11. Housing Need and Delivery

Housing Need

- 11.1. The NPPF (Para. 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 policies and 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 the NPPF. The London Plan sets a target for the provision of 66,000 new homes across London each year. Whilst Enfield's 2019 Housing Action Plan recognises that the construction of more affordable high-quality homes is a clear priority, only 51% of approvals in the Borough have been delivered over the previous 3-years.

- 11.2. The London Plan 2021 identifies a need for a minimum of 1,246 dwellings per year to be delivered over the next 10 years in the Borough, based on the Strategic Housing Market Assessment (SHMA): an increase over the previous target of 798.
- 11.3. The Strategy sets five ambitions, the first of which is 'More genuinely affordable homes for local people'. The ambition sets a priority to maximise housing delivery and use council assets to achieve this. 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.
- 11.4. The 2018 London Housing SPG outlines a vision that delivers high quality homes and inclusive neighbourhoods by ensuring that appropriate development is prioritised. Policy H1 of the London Plan seeks housing delivery to be optimised on sites that have good public transport accessibility (with a PTAL 3-6 rating).
- 11.5. Taking into account the housing needs of Enfield's population, nationally- and regionally-set housing delivery targets and shortfalls in meeting targets, it is evident that this proposal to make more effective use of Council land to provide a greater number of homes, at a high-quality and with a range of housing types is wholly supported by policy.

Affordable Housing

- 11.6. The NPPF must be taken into account in the preparation of local plans and is a material consideration in planning decisions. Annex 2 of the Revised NPPF (2021) 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)”.
- 11.7. London Plan Policies H4 and H5 outlines a strategic target for 50% of all new homes delivered across London to be affordable with threshold level of affordable housing on gross residential development at 50% on public sector land where there is no portfolio agreement with the Mayor.
- 11.8. Core Policy 3 of the Core Strategy sets a borough-wide affordable housing target of 40% in new developments, applicable on sites capable of accommodating ten or more dwellings. Affordable housing should be delivered on-site unless in exceptional circumstances. In reflection of London Plan targets and the evidence demonstrating the crucial need for affordable housing, emerging Local Plan Policy H2 aims to secure 50% of all new homes in Enfield as affordable.
- 11.9. According to the Enfield Local Housing Needs Assessment 2020, only households with acute housing need are on the Council's housing register, that is, eligible to be given Council housing. The vast majority of those on the register, or waiting list, live in temporary accommodation. Households who are

not homeless or living in temporary accommodation rely on housing through the private sector and are typically supported by housing benefit. As of 2020, there were 12,300 households supported by housing benefit in the private rented sector within Enfield. The Assessment concluded that there is an annual net shortfall of 711 affordable rented homes. As the Assessment notes, this shortfall underrepresents the numbers of residents who are not in acute housing need but would still qualify housing benefit to afford accommodation.

- 11.10. The proposal includes the provision of 134 new homes at the Application Site. Of the 134 units, 92 homes, or 69% of units, are proposed to be affordable and delivered on-site. This comprises 27 shared ownership homes and 65 London Affordable Rent homes. The London Plan requires that the percentage of affordable housing on a scheme is calculated in habitable rooms to ensure that a range of unit sizes is provided. The proportion of affordable housing in this proposal in habitable rooms also equates to 69%. The delivery of 69% affordable homes, whether measured in units or habitable rooms, across the total housing offer accords with existing and emerging policy and makes the best use of Council land to extend affordable housing provision in Enfield.

Replacement of Affordable Housing

- 11.11. The proposal includes the demolition of two- to four-storey Beck House. As noted, a separate application for prior approval to demolish Beck House has been submitted by the applicant in order to address urgent safety concerns. It was determined that prior approval is not required and Beck House can be demolished under permitted development rights. Notwithstanding this, the provision of residential accommodation at Beck House is included here for completeness. Beck House was constructed in 1965 as one of two buildings (the other being Scott House) constructed on the then Angel Estate. It was built as council housing and has since functioned as a residential building. In recent years, Beck House has been impacted by recurrent instances of anti-social behaviour and crime. Sections of the building, particularly the western section, are in a state of substantial disrepair. The decision was taken by the Council to replace the building with a greater number of new, well-designed and well-built homes while also making more efficient use of the site in its entirety.
- 11.12. Policy H8 of the London Plan expects that the loss of existing housing is replaced by new housing at existing or higher densities with at least the equivalent level of overall floorspace. Any demolition of affordable housing must be replaced by an equivalent amount of affordable floorspace. Where there is a loss of vacant social rent housing, it may be provided as either social rent or London Affordable Rent. The affordable units must also be integrated into the development and among other tenures.
- 11.13. Similarly, Enfield Policy DMD 4 prohibits the loss of any housing that can still be used unless there is a net increase in residential floorspace as part of the development. Affordable housing loss is only acceptable where it is part of managed replacement of housing and the development achieves a more appropriate mix of housing types and tenures and/or there is no net loss of habitable rooms. In all cases, the resulting development must be of a higher quality and design standard, and improve the wider environment.
- 11.14. The recent residential history of Beck House is described in two parts: the eastern section of the building and the western section of the building.

Eastern Beck House

- 11.15. The eastern part of Beck House comprises 34 bedsit (studio) flats totalling approximately 1,088sqm. (or 1,250 sqm?)
- 11.16. This section was owned and operated by Riverside Housing Association (RHA) as supported housing for single or childless couples ages 18 to 64 with support issues or those at serious risk of becoming homeless. This use ceased in 2016 following the withdrawal of Government funding for the support services.
- 11.17. RHA then operated the 34 units as temporary accommodation on behalf of the Council. The temporary accommodation served as emergency housing for vulnerable individuals/couples and those who were at risk of becoming homeless. This use was in place between September 2016 and October 2021. In that period, RHA rehoused approximately half of the residents among its own properties and the remaining residents sourced their own accommodation.
- 11.18. In the spring of 2020, the Government's 'Everyone In' programme led to the re-use of this part of the building for rough sleepers who needed emergency accommodation. During this time, only four households remained from the period of RHA's management, the remaining 30 units were occupied by rough sleepers.
- 11.19. Over 2021, residents were re-housed elsewhere in Enfield through a GLA-funded programme to deliver 73 bedspaces for move-on accommodation for homeless people in the Borough. By October 2021, Beck House was vacant as the last households, including the four households who required supportive housing, had been successfully relocated.
- 11.20. Policy DMD15 sets out the criteria which must be met in order for a loss of specialist housing to be permitted – the floorspace should either be provided elsewhere or it should be demonstrated there is no longer a need for both the use and the tenure.
- 11.21. The temporary housing that was previously provided at Beck House has been newly provided at another location within Enfield and residents who occupied the Beck House temporary housing were rehoused in the new accommodation constructed as part of the GLA-funded initiative. On this basis, it is not considered that there has been a loss of temporary housing as a result of the vacancy and demolition of the eastern section of Beck House to enable the proposed development.

Western Beck House

- 11.22. The western section of Beck House has been Council owned and operated. 12 units are contained in this segment of the building: three leasehold units and nine social rent homes.

Western Beck House

	1-beds	2-beds	Floorspace	Hab rooms
Leasehold	2	1	203.2 sqm	8
Social rent	8	1	463.6 sqm	20

- 11.23. The units were vacated between October 2014 and March 2018 as the Council negotiated with leaseholders to buy back their properties and to secure homes for the nine council tenants. The decision was made not to re-let any units until the

future of the building was determined. The three leaseholders, after selling their properties back to the Council, independently relocated. The remaining nine social rent households comprised of secure tenants who had been re-housed in other Council properties also under secure tenancies.

- 11.24. While the nine social rent households were provided housing in other Council accommodation, London Plan Policy H8 and Enfield Policy DMD 4 prohibit the loss of affordable housing floorspace unless it is replaced at existing or higher densities, there is a more appropriate mix of housing types and tenures and the new housing is of a high quality. Nine social rent units are lost at Beck House as part of its demolition, but the replacement development proposes 134 units, 27 of which are shared ownership and 65 are London Affordable Rent. Accounting for the demolition of units, there is a 125-unit overall net increase of homes at the site, and included in this, a net increase of 83 affordable homes. The proportion of affordable units to the overall housing offer is 62%, still above targets of 50%. The London Plan requires that the provision of affordable housing is calculated in habitable rooms. Deducting for the loss of 20 social rent habitable rooms at Beck House, the proposal still yields an affordable proportion of 65% of all habitable rooms.
- 11.25. In sum, although there is a loss of social rent units resulting from the demolition of Beck House, the replacement and uplift of affordable homes is policy compliant and acceptable in planning terms.

Housing Tenures

- 11.26. London Plan Policy H6 sets out the split of affordable tenures that should be applied in residential development:
- a minimum of 30 per cent low-cost rented homes, as either London Affordable Rent or Social Rent, allocated according to need and for Londoners on low incomes
 - a minimum of 30 per cent intermediate products which meet the definition of genuinely affordable housing, including London Living Rent and London Shared ownership
 - the remaining 40 per cent to be determined by the borough as low-cost rented homes or intermediate products (defined in Part A1 and Part A2) based on identified need.
- 11.27. Enfield Core Policy 3 and DMD Policy 1 stipulate a borough-wide affordable housing ratio of 70% social rented and 30% intermediate provision.
- 11.28. The development proposes the following affordable tenure split:

London Affordable Rent	Shared Ownership
65 homes	27 homes
71% of total affordable	29% of total affordable

- 11.29. The application proposal meets tenure requirements, as above. Priority is given to low-cost rented homes to address the acute needs of the Council's housing waiting list. The affordable housing offer, in terms of tenure split, is acceptable.

Dwelling Mix

- 11.30. London Plan Policy H10 states that schemes should generally consist of a range of unit sizes and that this should have regard to a number of criteria including robust local evidence, the mix of uses in the scheme, the range of tenures in the scheme, the nature and location of the site, amongst other considerations.
- 11.31. Core Policy 5 of the Core Strategy seeks to provide the following borough -wide mix of housing:
- Market housing – 20% 1 and 2 bed flats (1-3 persons), 15% 2 bed houses (4 persons), 45% 3 bed houses, (5-6 persons), 20% 4+ bed houses (6+ persons).
 - Social rented housing - 20% 1 bed and 2 bed units (1-3 persons), 20% 2 bed units (4 persons) 30% 3 bed units (5-6 persons), 30% 4+ bed units (6+ persons).
 - The mix of intermediate housing sizes will be determined on a site by site basis and the appropriate mix must take into account a range of factors, including development viability and the affordability of potential users.
- 11.32. The evidence base to support the unit mix set out in Core Policy 5 dates from 2008. More recently, the Local Housing Needs Assessment 2020 was prepared to support the emerging Local Plan and is the most up-to-date source of evidence. Draft Local Plan Policy H3, outlines priority types for different sized units across different tenures:

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

- 11.33. The Council's Local Housing Needs Assessment 2020 outlines that 41.1% of new affordable homes should have three bedrooms. This is based on housing register evidence. It also outlines that the focus of affordable ownership provision (shared equity/intermediate products) should be on one and two-bedroom units, as the majority of households who live in intermediate (shared ownership) housing are households without children.

- 11.34. The applicant proposes the following dwelling mix across the entire housing offer:

	1 bedroom		2 bedroom		3 bedroom		4 bedroom	
Market	14	33%	15	36%	13	31%	0	0
Shared ownership	16	59%	11	41%	0	0	0	0
London Affordable Rent	16	25%	9	14%	32	49%	8	12%
Total	46	34%	35	26%	45	34%	8	6%

- 11.35. Taken as a whole, the proposed dwelling size mix deviates from the adopted policy (Core Policy 5) and the borough-wide evidence of need, providing a larger

proportion of one-bedroom units and fewer 3- and 4-bedroom than the evidence indicates needs to be provided.

- 11.36. Looking at the individual tenures, the market housing component would have to provide a greater number of 3- and 4-bedroom homes, and fewer 1-bedroom and 2-bedroom homes to comply with policy and need.
- 11.37. The London Affordable Rent proposal successfully and beneficially meets the crucially needed 3- and 4-bedroom family-sized homes. The breakdown does skew towards including more 1-bedroom and fewer 2-bedroom homes than needed, although the overall proportion of London Affordable Rent units against the total number of homes is high at 49% of all homes. In assessing the comparable deficit of 2-bedroom units, it should be taken into account that the overall scheme delivers a high proportion of London Affordable Rent housing.
- 11.38. The intermediate shared ownership tenure includes 59% 1-bedroom and 41% 2-bedroom homes. London Plan policy directs the Council to consider the dwelling size mix of intermediate tenures based on market evidence. In this regard, the proposal is appropriate and the balance of unit sizes in the intermediate tenure is accepted.
- 11.39. The London Plan makes allowance for site- and location-specific considerations to allow flexibility in applying housing mix standards, as well as enabling a design-led approach to be taken in the optimisation of a site's capacity.
- 11.40. The Government prescribes a "tilted balance" in favour of housing delivery to the Council's planning decision-making as a result of Enfield's shortfall in meeting housing delivery targets. This means that applications for new homes should be given greater weight, and Councils should grant permission unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits of the housing proposal. In 2021, Enfield delivered 67% of its Housing Delivery Test target for the preceding three-year period. Development on Council land presents a significant opportunity to provide needed housing. Although not in line with recently demonstrated need, the proposed dwelling mix with an increase in one-bedroom homes and a relative gap in 3- and 4-bedroom homes means that more homes are provided overall. Crucially, the delivery of family sized homes that are proposed in this application has been focused in the London Affordable Rent tenure to offer homes to families with the greatest need. 61% of London Affordable Rent homes are 3- and 4-bedroom units. It should be noted again that the emerging Site Allocation 17 in the new Local Plan indicates capacity for 198 homes across the site allocation site. The 134 proposed homes correspond to the segment of the allocation site that the Application Site comprises.
- 11.41. As has been stated, the London Plan promotes the best use of land and intensification of sites, especially where they are well connected by transport infrastructure. The Application Site is 500 metres from the Silver Street Overground station and 300 metres from Fore Street, the Angel Edmonton town centre. The site has a PTAL rating of 5. Given the site's strong connectivity, there is a valid planning rationale for increasing the density of the site and providing a higher level of smaller (one-bedroom) units that can benefit from the convenient location and suitable local amenity. Rearranging the residential floorspace would involve a large loss of one-bedroom units to provide a relatively small number of additional 3- or 4-bedroom units, and overall harmful impacts to the layouts of other homes.

- 11.42. The configuration, shape and boundaries of the site present challenges to designing a site plan that achieves a high level of amenity for residents. The proposal has mitigated the noise and outlook impacts arising from its long northern border with the North Circular Road by ensuring units are dual aspect and private rooms face south. The long and narrow shape of the site creates challenges for arranging homes efficiently and providing the open space and amenity needed particularly by family households. The provision of family homes has been maximised through the use of terraces, maisonettes and homes with ground floor access – the inclusion of more family-sized units would mean a compromise to the amenity of these units, as well as impacts on the quality and configuration of smaller homes.
- 11.43. Given the evidenced need for new housing, the high proportion of family-sized units proposed within the London Affordable Rent offer, the accessible location of the site and the efficiency of site layout, it is considered that the collective benefits of the proposal outweigh the divergence of the dwelling size mix from policy.

12. Design

High-quality design

- 12.1. Paragraph 126 of the NPPF underscores the central value of good design to sustainable development. The Framework expects the planning process to facilitate “high quality, beautiful and sustainable buildings and places”. As in Paragraph 130, the assessment of a scheme should take into account the endurance of the design, visual appeal, sensitivity to local context, sense of place, optimisation of the site and contribution to health and wellbeing.
- 12.2. London Plan Policy D4 encourages the use of master plans and design codes to ensure the delivery of high-quality design and place-making. Design scrutiny, through the use of Design Review Panels is encouraged.
- 12.3. Enfield Policy DMD 37 sets out objectives for achieving good urban design: character; continuity and enclosure; quality of public realm; ease of movement; legibility; adaptability and durability; and diversity.
- 12.4. The overall design approach to making better use of the Application Site has been well rationalised and is generally supported. Scott House remains the central and most dominant element of the site plan. The reorganisation of the site takes advantage of the opportunity to improve Scott House’s access, emphasise the point of intersection on the eastern side of Scott House to provide a central square and improve connectivity, position buildings effectively along the length of the North Circular Road and Upton Road, repurpose the existing blank areas of turf with suitably massed buildings and functional landscaping, and graduate heights away from Scott House towards the existing low-rise residential stock and Raynham Primary School. The site plan provides good amenity to existing and new residents, both within and adjacent to the Application Site.
- 12.5. Aspects of the design proposal are further assessed below. The title block site plan with building names is provided for ease of reference.



Density

- 12.6. The 2021 London Plan has amended the policy approach to assessing density. Whereas previous policy set out ranges of appropriate density based on location and site access, the current Policy D3 emphasises the importance of a design-led approach to optimise site capacity, including site allocations. This removes the standardisation of density calculations with a more site-specific evaluation.
- 12.7. Adopted Core Policy 5 states that density should balance the need to make the most efficient use of land, account for accessibility to transport and respect existing character. DMD Policy 6 is also guided by the London Plan density matrix (which has now been superseded by current London Plan Policy D3, as above), wanting to ensure scale and form are appropriate, the development is of a high quality and regard is given to housing mix targets.
- 12.8. The impact of density is closely tied to user amenity – especially, in this application, the quality of residential accommodation. Quality and amenity are discussed in following sections.
- 12.9. The application proposes an overall increase in density from 102.8 (Scott House plus existing Beck House) dwellings per hectare (dph) to 164.3 dph. In light of the Application Site’s strong PTAL rating of 5, convenient proximity to Fore Street and Silver Street Overground station, the proposed scale and heights of new buildings having regard to neighbouring buildings, and support from policy to maximise delivery of housing in Enfield, the proposed resulting density is appropriate at this location.

Massing and height

- 12.10. London Plan Policy D9 outlines that Development Plans should define what is considered a tall building for specific localities, the height of which will vary but should not be less than 6 storeys (or 18 metres).
- 12.11. Policy DE6 of the emerging Enfield Local Plan outlines that the principle of tall buildings will be supported in appropriate locations and that different definitions of “tall buildings” are used throughout the Borough to reflect local context. Figure 7.4 within Policy DE6 identifies areas where tall buildings could be acceptable (subject to compliance with outlined criteria). Although not adopted as policy and having limited weight, the Application Site is identified within Figure 7.4, further indicating that the subject stretch of the North Circular Road is appropriate for tall buildings up to 33 metres in height.

- 12.12. The site plan arranges height relative to Scott House and existing buildings that comprise the site's context. In general, the buildings nearest Scott House and the North Circular Road are the tallest and then step down to the east, west and south, with the lowest-rise buildings along the Upton Road frontage. Increasing the scale of development around Scott House frames this central and 'marker' building. Block E2, nearest Scott House and the central square of the site plan, rises to 37.84 metres (7 storeys) in height. Adjacent Block G1 to the east steps down to 31.87 metres, and G2 rises to 30.5 metres (both 4-5 storeys). On the western side of Scott House, along the North Circular Road, Block A2 is 35.07 metres (6 storeys) at its tallest point. Block A1 is 30.91 metres tall (4-5 storeys) and Block D, nearest the primary school, is 30.9 metres (3-5 storeys) high.
- 12.13. The general composition of height is justified. The context of the North Circular Road presents an opportunity for taller buildings because of the larger distances between buildings, longer sightlines of the site. The scale and height of buildings lowers towards the lower rise context to the south and does not overshadow as it is sited to the north. Block D benefits from stepped massing and setbacks from the boundary giving sufficient distance to the school and caretaker's house. The terraced homes on Upton Road are of a human scale and mediate between the new phases, existing towers and the street.

Architecture and materials

- 12.14. The overall architecture of the proposal presents a restrained contextual approach with considered brick work, careful articulation and fine detailing. The delivery of the detail will enhance the urban form of Edmonton and provide an appropriate transition between the North Circular Road and adjacent terraced and semi-detached housing.
- 12.15. The architecture of the buildings relies on the rhythm of fenestration, brick detailing, quality and colour to provide variety. This simplicity is a strength but without the right selection of final materials and high-quality execution, the elegant character of the design will be lost and the simplicity is at risk of becoming bland. On this basis, officers recommend a condition requiring the submission of all external materials for review.
- 12.16. The angled form of the roofs and articulation of buildings helps to create a characterful and distinct form. The set-backs and undulation in plan and section help to reduce the perception of a "wall" being created, particularly along the North Circular Road. The detailing and variety in the building form as captured in the application drawings help to mitigate the "monolithic" effect.
- 12.17. Overall the window opening details appear to be of an appropriate quality with sufficient reveal depths shown (approx. one standard brick) to provide depth and variety in the elevations. The concrete lintels and banding successfully add variety to the North Circular elevation.
- 12.18. The numerous brick details (sawtooth, ribbed/corduoy) are vital in successfully breaking up the elevations and providing visual interest and perception of scale. These features also help to define the buildings (the energy centre, maisonettes) and simultaneously unify the composition of buildings as one coherent development.

- 12.19. To ensure buildings are constructed in accordance with the details set out in the planning submission, the applicant has included plans, sections, elevations and detail drawings to ensure these elements are captured in the planning decision. A condition is included to comply with the approved drawings.
- 12.20. As per London Plan Policy D4, officers recommend a S106 Clause ensuring continuous involvement by a high-quality architect, in this instance, the scheme architects, Levitt Bernstein.

13. Residential quality and amenity

- 13.1. London Plan Policy D6 sets out numerous standards and parameters to ensure housing is of the highest quality. The policy stipulates room sizes, aspects, daylight and sunlight standards and outdoor amenity space as well as other criteria. Similarly, Enfield Policy DMD 8 includes criteria that new residential development must meet.

Aspects

- 13.2. Policy D6 of the London Plan gives strong precedence to the development of dual aspect dwellings; single aspect dwellings are only acceptable where it is a better design solution to optimise site capacity, and will have adequate passive ventilation, daylight and privacy, and avoid overheating.
- 13.3. For the purposes of dwelling orientation, ventilation, daylight and outlook, the site location and configuration present several impediments, including a long, north-facing frontage along the North Circular Road, which raises noise, air and outlook challenges. The site is narrow, therefore, the location of windows needs to factor privacy, distance and overlooking.
- 13.4. In sum, 85% of the 134 new homes are dual or triple aspect. A further 12 units, or 9% of total homes, have been classified by urban design officers as being “enhanced single aspect”, meaning, they are dual aspect but of a lesser quality with fewer passive benefits than most dual aspect homes. The remaining 6%, or 8 units, are all 1-bedroom/2-person dwellings with one aspect.
- 13.5. Where the development proposes single aspect units and there is no alternative design solution to improve them to two aspects, the Housing SPG provides a set of criteria the single-aspect dwellings must meet, including natural ventilation, privacy, daylight and a shallow plan. A close review of each of the single aspect homes reveals that these requirements are generally met. The three units in the northeast corner of Block I, overlooking the North Circular Road, present the greatest challenge in overcoming the constraints of being single aspect. Following consultation with the applicant and architects, it is understood and accepted that a lack of passive ventilation and poor outlook is being mitigated through Mechanical Ventilation and Heat Recovery and an east-facing winter garden. For all other units, the proposed aspects are acceptable.

Space Standards

- 13.6. All units either meet or exceed internal floorspace standards required by London Plan Policy D6, Table 3.1. The Planning Statement confirms that all 134 units would meet Nationally Described Space Standards and private amenity space will be provided to all units in the form of balconies and/or private gardens.

Daylight and sunlight

- 13.7. The Building Research Establishment (BRE) document 'Site Layout Planning for Daylight and Sunlight: A guide to good practice (2011)' sets out the tests used to assess daylight and sunlight impacts of development on neighbours, future occupiers of the development and adjacent open spaces. The applicant submitted a Daylight & Sunlight Report (2021) with the results of each of the relevant assessment methods.

Neighbouring properties

- 13.8. The analysis of daylight/sunlight impacts to neighbouring properties has performed using Vertical Sky Component which measures the amount of visible sky available from a point on a vertical plane. The impact is 'adverse' if the resulting value is both less than 27% and less than 0.8 times its former value.
- 13.9. There are several existing properties along Upton Road (including nos. 2, 8, 12, 14, 22, 24, 28, 38 and 42) each with one window to either a front room or bedroom that will experience a reduction in VSC of between 0.4 and 0.7 times its former value. A reduction of less than 0.8 is considered adverse. In almost all instances, the windows are one oblique facet of a five-faced bay window, and in all instances, already have VSCs well below 27%, so an additional loss of sky is likely to present as being proportionally high. However, as these are multi-faceted bay windows, light is entering rooms from more than one direction. In these instances, the impact to VSC is accepted as the actual impact is minor and unlikely to be significantly perceived. 18 Woolmer Road includes one small flank window that will experience a 0.57 loss, resulting in a VSC of 17.7; this affected space is likely to be a hallway. 58 Raynham Road appears to be a residential property on the Raynham Primary School site and experiences an impact to six windows facing the development, retaining 0.58 to 0.68 of original VSC. However, the resulting VSCs are between 21.3 and 26.2, which is acceptable at an urban location.
- 13.10. Windows on the lowest three floors of the north façade of Scott House will be impacted with reductions generally between 0.4 and 0.65 of existing VSC. The resulting VSCs are not significantly below 27% and, as such, are acceptable.

Future occupiers

- 13.11. Average Daylight Factor (ADF) is a measure of the light within a room – specifically the average indoor illuminance (from daylight) on the working plane within a room. ADF has been used to assess the level of light in the new development. Recommendations are ADF of no less than 2% for kitchens, 1.5% for living rooms and 1% for bedrooms. The Daylight & Sunlight Report demonstrates that the ADF measures are very good; in the large majority of instances, ADF levels exceed standards. In a few instances where ADF levels are slightly below standards, the level of light may be impacted by the inclusion of a balcony, which is a beneficial amenity and in itself affords access to light. In the assessment of Annual Probable Sunlight Hours of living rooms, results indicate all living rooms will achieve acceptable sunlight levels.

Overshadowing

- 13.12. A review of the development's impact to sunlight on adjacent open spaces, both existing and proposed, indicates that most open spaces will generally receive an acceptable amount of sunlight, measured as a minimum of two hours on 21 March.

The greatest deficiency is in the southern half of the eastern courtyard surrounded by Blocks E, G, H and I. The length of the southern half of the courtyard as well as the north facing small rear gardens of properties on Block H will not achieve this minimum. These houses have been provided with terrace space at a higher level that receives a good amount of sunlight. Given the large size of this courtyard space, and that the design has been sensitive to locating low-rise buildings along the southern border on Upton Road, on balance, this amount of overshadowing is accepted.

Inclusive Design

- 13.13. Policy D7 of the London Plan states that at least 10% of dwellings meet Building Regulation requirement M4(3) 'wheelchair user dwellings', and ii) all other dwellings meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings.' At a local level, policy DMD8 of the Development Management Document has similar policy objectives.
- 13.14. The proposal achieves requirement that 10% (or 14 of 134 units) meet requirement M4(3) as 'wheelchair user dwellings.' 107 of the 134 units (or 80%) meet M4(2) 'accessible and adaptable dwelling' requirements. M4(2) requirements enable most people to access the dwelling and includes features that make it suitable for a range of potential occupants, including older people, individuals with reduced mobility and some wheelchair users. The remaining 13 units meet M4(1) 'visitable dwellings' requirements, which means the dwelling makes reasonable provision for most people, including wheelchair users, to access and enter the dwelling, and access habitable rooms and sanitary facilities on the entrance level. While the London Plan seeks to ensure that all new units that do not meet M4(3) requirements, meet M4(2) requirements, there are design and flood mitigation constraints that impact several units. 10 of the M4(1) units are within Blocks A1, A2 and G1 parallel to the North Circular Road. Main entrances to these homes is on the southern side of the buildings – due to level changes and raised first finished floor levels to mitigate flood risk, these main entrances are accessed by a step. Each dwelling does have a step-free secondary entrance from the North Circular side. In these instances, given there are two points of access, M4(2) requirements are partially met, but the units are classified M4(1).
- 13.15. Although it is expected that all occupants and visitors share equal provision of access across the development, conflicting requirements and site conditions prevent the M4(1) units from fully complying with M4(2) standards. In view of the partial compliance afforded by a step-free entrance from the North Circular and the need to meet other safety requirements, it is accepted that the 13 units will meet M4(1) requirements, and that the housing is found to be satisfactorily accessible.

Fire Safety

- 13.16. London Plan Policy D 12 outlines that in the interests of fire safety and to ensure the safety of all building users, all development proposals must achieve the highest standards of fire safety and ensure that they follow a set criterion. Part B of the policy outlines that all major development proposals should be submitted with a Fire Statement which is an independent fire strategy, produced by a third party, suitably qualified assessor.

- 13.17. This application is submitted with a Fire Safety Statement (November 2021) and RIBA Stage 3 Fire Strategy (November 2021).
- 13.18. Section 3 of the strategy details means of escape inclusive of those with reduced mobility. Section 4 of the strategy outlines means of warning and section 5 outlines details surrounding fire spread control. Access facilities for the fire service and fire safety management and maintenance details are outlined.
- 13.19. The London Fire Brigade were consulted on this application however did not comment. The London Fire Brigade is a non-statutory consultee. The Fire Safety Statement and Fire Strategy were reviewed by Enfield's Building Control officer and specific consideration was given to fire access considerations accounting for locations of dry risers, parking for fire tenders and hose reel distances. Based on standard calculations, officers are satisfied that the fire access requirements will be met. Further required calculations will be completed at detailed design stage and will be subject to scrutiny through the Building Control process and therefore are outside of immediate planning considerations.
- 13.20. It is recommended that planning conditions require compliance with the submitted Fire Strategy in accordance with London Plan Policy D12.

Secured by Design

- 13.21. London Plan Policy D11 and Core Policy 9 promote the integration of design measures that create safe and secure environments for the community. This is seen as integral to good design.
- 13.22. The applicant engaged with the Designing Out Crime Office of the Metropolitan Police during the design phase, and Enfield consulted the Met during this application review. The Designing Out Crime Officer provided comments.
- 13.23. The Met highlighted concerns around the particularly high levels of criminal activity in the area and presently on the Application Site. The officer points to Beck House, given its vacant state and construction with open stair core, as attracting unlawful behaviour. The condition requiring Secured by Design Accreditation prior to commencement of above-ground works and certification prior to occupation is recommended; the two-step condition will ensure continued engagement with Designing Out Crime officers through detailed design and construction.
- 13.24. The applicant has already advised general compliance with numerous measures to increase site security, including a compliant public realm lighting plan, secure car park entrances, access control entrances and internal circulation and public realm with clear sight lines.
- 13.25. The applicant incorporated gates into the design of three of the communal private open spaces on the Application Site. Early in the design, the Designing Out Crime Officer identified the elevated podium space to the west of Scott House and the courtyard open space flanked by Block D in the southwestern corner of the site as needing this additional element of security. The configurations and locations of these private open spaces are especially sensitive as there is more limited natural surveillance and greater direct proximity to residential windows than other open spaces within the site plan. Although London Plan Policy D5 supports design that is inclusive with as few separating barriers as possible, it is deemed that these two spaces have limiting circumstances that require gates to

ensure a suitable level of protection and therefore gating in these locations is supported.

- 13.26. The eastern courtyard surrounded by blocks E, G, H, I is a larger open space than the two above-mentioned spaces. In addition to being an outdoor amenity for residents of these blocks, it also provides access to main entrances to blocks fronting the North Circular Road. It has been the design intention to leave access to the courtyard from Upton Road and the central square open, and to encourage a perception of openness. It is acknowledged, however, that the courtyard is a private space and does not provide any beneficial through-route for non-residents. The Designing Out Crime Officer did have reservations about leaving this space completely open. It is therefore recommended that gates be installed and a condition is included that requires closure of the gates during night hours, between 7pm and 6am. This will retain ease of access for residents of blocks overlooking the courtyard while providing an additional level of protection at night.

14. Open Space, Play Space, Landscaping and Trees

Open Space and landscaping

- 14.1. London Plan Policy D6 sets out standards for housing quality and requires a provision of private open space to meet the needs of the new and existing occupants of the site and Policy G4 encourages development to provide new areas of open space where possible. The London Play and Informal Recreation SPG sets standards of quantity and quality in the provision of new play spaces. Enfield Policy DMD 71 guards against the loss of open space resulting from development unless the loss can be re-provided or mitigated. Policy DMD 73 further sets out the Council's expectations around the delivery of play spaces. The emerging Local Plan identifies the value of informal, doorstep and play-on-the-way spaces that are integrated into landscape design.
- 14.2. According to the applicant's calculations as presented in the application, 7,450 sqm of open space is proposed as part of the application and there is presently 4,652 sqm of open space on the site. In response to a request for clarification, the applicant corrected this information to share that the existing amount of open space is 8,316 sqm. While the revised amount of existing open space seems more accurate as it is expected the amount of open space would decrease post-development, the approach that has been taken to accounting for open space is not entirely in line with the policy definition. The applicant has included almost all of the space within the site boundary that is not occupied by building footprint, including proposed parking spaces and the ramp entrance to parking beneath the podium. While open space is, as by the adopted definition, "All areas free of development", the definition cites "public landscaped areas, playing fields, parks and play areas, and also including areas of water..." Although a landscape approach is being applied to the entire area in the red line, not all of the area is provided to function as open space, so it is noted that both the existing and proposed areas of open space are over-calculated, but it stands to reason that the total amount of open space is proposed to decrease as a result of more of the site being developed.
- 14.3. As has been discussed, planning policy across all levels supports the central objective of this application to better utilise this Council site for more housing and provide better quality accommodation and amenity all-around. By its nature, the development requires an intensification of the site, which entails a reorganisation of the site plan and infill of underutilised areas. Currently, the Application Site is

underutilised both in its built areas (Beck House and garages) and in its landscape conditions, with large areas of grass, mounds and hardscape for parking, that provide visual relief, but no functional open space or integral landscaping. It should also be noted that the majority of open space on the site is private in that it is not designated open space for general public recreation. Therefore, construction over the open areas does not constitute a loss of designated public open space. Still, policy supports a replacement of lost open space and delivery of play areas.

- 14.4. The application proposes extensive landscape works to improve the green amenity at the site and comprehensively integrate trees, soft planting, furniture, play features, suitable surfacing in to the open spaces, paths and areas of public realm.
- 14.5. Through the process of site planning, five areas of open space have been identified: the green buffer running the length of the border with the North Circular Road, local 'green link' into the site from Rayham Road at the west, the central square fronting Scott House in the middle of the site, the elevated podium space on the western side of Scott House, and the two courtyard areas wrapped by new buildings at the eastern end of the site and south-western corner.
- 14.6. The application includes a Landscape Plan, a Planting Plan and a Landscape Strategy to provide detail on the assortment of furniture, materials, paving, plants and trees proposed. A condition is recommended that the landscaping, public realm and highways improvements should be built out in accordance with the Landscape Plan and Planting Plan, and that finer details of the hard and soft landscaping, alongside details of enclosure, lighting and furniture/play equipment are submitted for review. The condition should clarify that the Landscape Strategy is indicative and officers may advise alternate, comparable solutions to the ranges set out in the strategy when details are reviewed.
- 14.7. In general, the landscape approach is of a high-quality and well-considered. The landscape plan appropriately identifies different areas of function and character.
- 14.8. The green link directs pedestrians and cyclists through the site from Raynham Road, to the north of Scott House, through the central square and onto Upton Road; the planting and paving features provide a good level of visual interest and practical durability to this path.
- 14.9. The central square complements the improved access to Scott House and better utilises the space in front of Scott House to integrate the existing building into the site plan. Stairs down to the Scott House lower ground floor are planted and include play features to maximise utility; areas in front of commercial units are planted rain gardens as both SuDS mitigation and softening of the hardstanding.
- 14.10. The podium space on the west side of Scott House is an effective solution to making better use of the space occupied by the car park below. Residents of Scott House will also have direct access to the podium space at podium level. Suitable buffer areas have been designed into separate common podium space from first floor flats in Scott House and Block D that face the podium. It will be accessible only to residents of these two buildings and gating and fencing will be provided for security. A condition is recommended requiring that this podium be provided in accordance with the approved plans before occupation of new development.

- 14.11. The green buffer fronting the North Circular Road plays a vital part in adding green relief to this major vehicular road, softening the line of building facades and offering privacy to new residents. This area also provides a cycle path and pedestrian access along the North Circular and to the bridge across the North Circular – it is vital that the landscaping strikes a balance to meet all of these functions. The selection of planting and trees in the Landscape Strategy is generally appropriate and it is, again, recommended that a condition is included to agree the final set of plantings in this area and any form of enclosure that may be needed to define what is private and what is public space, without compromising the open character that all are keen to create.
- 14.12. The two courtyard spaces are each uniquely positioned and arranged. The eastern courtyard bounded by blocks E, G, H, I is long and narrow, and some of the space is dedicated to circulation between buildings as well as private gardens to individual units. The general arrangement is supported, with appropriate design mechanisms used to allow privacy to lower-level homes, while also creating an optimally green space with varieties of plants and doorstep play features, as well as swales. The smaller courtyard wrapped by Block D is more secluded with landscaping to support this quieter use. As before, a condition to require further detail will help to further define the final selection of planting and materials.
- 14.13. In sum, the landscaping approach is supported as it makes the most of the open space on the site in a thoughtful and deliberate way. Although the development inevitably involves a net loss of open space, the re organisation and form of the open space provided is well designed, supports Scott House and the new development and maximises the benefits of open space for all residents' use. Good maintenance will be key to the success of the open space, a condition is recommended to ensure the spaces are suitably looked after.

Play space

- 14.14. The London Plan, the London Play and Informal Recreation SPG and Policy DMD 73 all recognise that new development generates a need for suitable play space based on estimates of children that will occupy the site. It is generally expected that play provision is delivered on site – where this is not possible, there are means to meet needs off-site, most often through a planning obligation.
- 14.15. The London Play and Informal Recreation SPG provides a comprehensive set of guidance on the amount of play space need a development generates per age group and advises what form the play space should take to satisfy the needs. The table summarises the amount of play space expected of the proposed development and how much is provided on site as part of the application. The needs of the existing Scott House are included.

Play space requirement per London Play and Informal Recreation SPG

	Required	Provided on site (shortfall)
Age 0-4	781 sqm	821 sqm (0 sqm)
Age 5-11	639 sqm	318 sqm (-321 sqm)
Age 12+	530 sqm	0 sqm (-530 sqm)
Total	1,950 sqm	1,139 sqm (-811 sqm)

- 14.16. The application proposes several areas of play space throughout the Application Site; together, the play areas as identified by the applicant, total 1,139 sqm. Provision required for 0-4 year olds is met, however, there is a shortage of on-site provision for the 5-11-year old group, and age 12+ group. Policy DMD 36 and Enfield's S106 SPD require that open space need that is unmet on site should be mitigated through improvements within a stipulated distance. Improvements are secured through contributions through the S106 agreement. It is intended that the contribution will fund improvements to access to nearby open space – notably Florence Green Park, an engagement process with age 12+ local residents to inform the most suitable open space provision for this age group, and the delivery of new or improved open space amenity to mitigate the deficiency.
- 14.17. In addition to quanta, the London Play and Informal Recreation SPG further sets out what form play space should take relative to the size and nature of the development. This proposal generates a requirement for on-site local or neighbourhood playable space. Local playable space is generally suitable for children up to age 11 and should have natural landscaping, integrated play equipment for swinging, sliding and climbing, space for ball play and seating for supervision. A neighbourhood playable space is larger and allows for biking, skateboarding, basketball and lots of active play.
- 14.18. There are seven principal areas of play proposed on the site, ranging from doorstep play with small climbing features along the green link to more formalised play equipment on the podium space. In sum, the landscape design has taken several opportunities to incorporate play elements into the broader open space plan, using discreet spaces that would otherwise be reduced to circulation, to allow children to engage. The stairs down to Scott House on the central square, for example, include climbing and sliding; the eastern courtyard features bioswales that perform SuDS mitigation and introduce water play. The naturalistic, cohesive and incidental nature of the play features is a strength and complies with the direction of play design promoted by the London Plan, adopted guidance and increasingly Enfield emerging policy. The application includes an Open Space and Play Space Strategy with layouts of individual play areas and indicative ranges of play equipment and materials.
- 14.19. The proposed play provision is well designed and thought-out and, with contribution towards play improvements to mitigate the shortfall of provision on site, the overall strategy is supported. It is acknowledged that the play spaces on site, as shown in the landscape plan and Open Space and Play Space Strategy, does not fully meet the London SPG guidance for local playable space. The Application Site presents several constraining factors and, in a central location, the chief objective is to maximise the provision of housing and deliver suitable amenity alongside it. The proposed play elements are generally appropriate to the site. A condition is recommended to further refine the play features so they can maximise play opportunity per the London Play and Informal Recreation SPG and they are of a quality that will be durable and enhance the overall quality of the site's landscaping. A contribution to off site play and open space enhancements to address the deficiencies for the older age ranges will be secured through the shadow S106 Agreement.

Trees

- 14.20. 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. The Policy further sets out that planting of new trees, especially

those with large canopies, should be included within development proposals. Additionally, Policies G1 and G5 refer to green infrastructure and urban greening, which can be incorporated within the development.

- 14.21. At a local level. Policy DMD80 of the Development Management Document stipulates that developments do not result in any loss or harm to trees of significant biodiversity or amenity value, or adequate replacement must be provided whilst the Enfield Issues and Options Plan outlines the benefits that trees offer to people and the environment by improving air quality, reducing noise pollution, contributing to climate change adaptation and reducing the urban heat island effect. Additionally, Policy DMD 81 of the Development Management Document refers to landscaping.
- 14.22. The application includes a Tree Survey and Arboricultural Impact Assessment. The survey found that one Cockspur Thorn on the site requires felling as it in poor condition. The remainder of the trees proposed to be removed require felling because they are in the area of proposed building. The survey identifies 16 individual trees and tree groups that are proposed to be removed; these are deemed British Standards Condition B and C. Three trees are on TfL land adjacent to the North Circular, although still within the application boundary. The Assessment concluded that these trees provide “moderate” visual amenity. In addition to the comprehensive landscaping of the site, the application proposes the planting of 116 trees across the Application Site, including along the North Circular Road, within the proposed courtyard spaces and the central square, as well as the approaches from Raynham and Upton roads.
- 14.23. It is considered that, subject to appropriate conditions for an Arboricultural Method Statement (AMS) and Tree Protection Plan (TPP) to demonstrate how the trees would be successfully protected throughout the site’s development, a planting plan/schedule and a landscaping specification including a scheme of aftercare and maintenance, the details are considered acceptable in relation to trees and in line with relevant policies including Enfield Policies DMD80 and DMD81 of the Development Management Document and Policy G7 of the London Plan.
- 14.24. While it is regrettable that so many existing mature trees are proposed to be removed to make room for the development, on balance the benefits associated with the proposal outweigh this loss of existing trees. The proposal includes 116 new trees amongst substantial amounts of landscaping, which will introduce a host of open space benefits that are, as a whole, supported.

Impact to Epping Forest Special Area of Conservation (SAC)

- 14.25. Natural England wrote to relevant Councils on 20th September 2018, in relation to the establishment of the Epping Forest Special Area of Conservation (SAC) Strategic Mitigation Strategy. Natural England have established a recreational ‘Zone of Influence’. Any residential development (proposing 100 plus units) within 6.2km of the SAC is required to deliver a package of avoidance and mitigation measures as well as make a financial contribution to strategic measures as set out within the costed Strategic Access Management Measures. This is to adequately mitigate, on a site by site basis, any recreational impact on the SAC that is located within the Zone of Influence.
- 14.26. Natural England were consulted on this application and outlined the applicant should undertake a Habitats Regulations Assessment (HRA) as well as provide

additional detail as to the avoidance and mitigation measures of the development. This work was undertaken by the applicant and submitted to Natural England.

14.27. The submitted HRA outlines the proposed measures delivered by this scheme to mitigate recreational pressure on the SAC, as summarised below:

- Well-designed open space/green infrastructure within the development
- Improvements to footpath networks
- Improved access and information to residents on locally available recreational spaces, including the 'Green Loop', Florence Green Park, Craig Park, and Pymme's Park
- Significant greening and landscape enhancements to the A406 and footbridge entrance
- Additional green areas between buildings and pedestrian routes
- An agreed SAMM payment (to be secured within the shadow S106 Agreement).

14.28. On receipt of the requested information, Natural England confirmed that they agree with the assessment conclusions and providing all mitigation measures outlined within the HRA are secured, Natural England has no objection and considers any impacts on the Epping Forest SAC or Lee Valley SPA and Ramsar can be appropriately mitigated.

Urban Greening Factor (UGF)

14.29. The planning statement states that the baseline Urban Greening Factor for the Site is calculated to be 0.26. The UGF Assessment for the Proposed Development provides a score of 0.43, which exceeds the London Plan target for residential development. This is considered acceptable.

15. Biodiversity and Ecology

15.1. The NPPF (Para.174) requires planning decisions to protect and enhance sites of biodiversity value, providing net gains for biodiversity and establishing resilient ecological networks. At a regional level, 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 guidance is also evident in London Plan policy G6 which requires developments to manage impacts on biodiversity and secure a net biodiversity gain. At a local level, policy CP36 of the Core Strategy requires development to protect, enhance, restore or add to existing biodiversity including green spaces and corridors, whilst draft Local Plan policy GI4 refers to the need to promote qualitative enhancement of biodiversity sites and networks and encourage the greening of the Borough. The emerging Local Plan, although of lesser policy weight, includes Policy BG3 which refers to a minimum of 10% net gain.

15.2. The provided DEFRA 3 Metric Biodiversity Impact Assessment Calculation reports a 10.21% increase in biodiversity units, which complies with biodiversity policy.

15.3. The buildings and trees have been assessed for their suitability for use by roosting bats and the development has been assessed in terms of its suitability

for protected species. The report concludes that the proposals are highly unlikely to affect protected species, including bats, reptiles and amphibians.

- 15.4. A few conditions are recommended to ensure that benefits to biodiversity and animal species are maximised:
- Hard and soft landscape is carried out in accordance with approved details and replaced within the first five year if plantings fail for any reason.
 - Full details of biodiversity enhancements should be provided.
 - A construction environmental management plan must be provided.
 - Full details of the green roof and vertical green wall including planting plans and maintenance schedules shall be submitted and approved in writing by the council.

16. Heritage and Archaeology

Heritage

- 16.1. NPPF paragraph 197 states that 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.
- 16.2. Several heritage assets (designated and non-designated) are located on and near the Application Site. A designated asset is one which is on the Secretary of State's list of heritage assets and therefore of national importance. A non-designated asset is defined as having a degree of heritage significance meriting consideration in planning decisions but which do not meet the criteria for designated heritage assets. (Para 30 NPPF). For example, one that is on the Council's own local list or even of some local interest but not on the local list.
- 16.3. The Application Site includes two non-designated heritage assets: the centrally-located 18-storey Scott House and two- to four-storey Beck House in the eastern section of the site. The Application Site also affects the setting of two designated assets. The Application Site is approximately 200 metres east of the Fore Street Conservation Area and Angel Place, a Grade II listed terrace is approximately 300 metres north and west of the Application Site. The application also affects the setting of a non-designated heritage asset, Raynham Primary School, located on the southern boundary of the Application Site
- 16.4. The planning application has been informed by a Heritage Assessment, in line with paragraph 194 of the NPPF.

Beck and Scott House (non-designated heritage assets)

- 16.5. The two buildings were designed by T. A. Wilkinson for Enfield Borough Council and constructed in 1965 on the Angel Estate, previously the site of terraced homes characteristic of adjoining streets. The buildings are non-designated

heritage assets and were identified for their heritage significance in 2017 through a report commissioned by Enfield Council on post-war public housing in the borough.

- 16.6. Scott House was a prototype building constructed by the Edmonton Direct Labour Organisation with the vertical battery casting system evolved by Edmonton Council with the Building Research Establishment. Refurbishment of the building was completed in 2014 with over-cladding of the original red-coloured cladding.
- 16.7. Beck House is constructed of yellow brick and concrete, designed in the Brutalist style with distinctive access balconies running the length of the second and third floors, and a flat roof. The two buildings together are considered to hold group value having been designed and constructed at the same time.
- 16.8. The proposal includes the demolition of Beck House to make more efficient use of the site, provide an uplift of better-quality homes, replacement commercial space, functional open space and improved amenity. Works to Scott House will enable community space in the ground floor, rationalised building access and entry to a podium open area.
- 16.9. Paragraph 203 of the NPPF states:

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.
- 16.10. Demolition of a non-designated heritage asset such as Beck House is necessarily the highest end of harm to that significance. The significance that is harmed is that of a non-designated heritage asset(s).
- 16.11. The demolition of Beck House and rupture of the Scott House/Beck House group is proposed to enable a more efficient use of the Application Site, with a rationalised site plan that includes a considerable uplift in the number of much-needed homes, higher-quality and more liveable housing than exists at Beck House presently, contemporary accommodation of commercial tenants, purposeful and well-designed landscaping and recreational area, improved connectivity to surrounding streets and a design that promotes safety. The development introduces a high level of public benefit to the residents of the Application Site as well as the Angel Edmonton community.
- 16.12. Paragraph 205 of the NPPF states that local planning authorities should require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible. However, the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted. A Building Recording was undertaken and added to the Greater London Historic Environment Record in order to document the significance of this heritage asset.
- 16.13. In accordance with NPPF paragraphs 201 and 203, the many benefits, including public benefits, of the development are recognised. It is considered that these benefits outweigh the loss of Beck House, especially as it is a non-designated heritage asset and has relatively low heritage value. The benefits also outweigh

any harm to Scott House and Beck House as a group. It is considered that there will be no harm to the significance of Scott House by the design, scale, and layout of the new development. Whilst it will be in close proximity and will surround the non-designated heritage asset to the west, south and east, Scott House will remain the taller and more dominant element.

Fore Street Conservation Area (designated heritage asset)

- 16.14. The Application Site is approximately 200 metres east of the Fore Street Conservation Area. The significance of Fore Street Conservation is derived from its evolution throughout the 18th, 19th and 20th centuries. It is a main road leading north from London which originally attracted investment by prosperous residents in the 17th and 18th centuries. Over the 19th and 20th centuries development diminished in quality and the street transformed into a principle shopping street. Fore Street retains a number of good quality buildings which represent a diverse range of architectural styles and typologies, and signify the evolution of the street.
- 16.15. Section 72 of the P(LB&CA) A 90 requires that special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.
- 16.16. Paragraph 199 of the NPPF states that ‘when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance’. Less than substantial’ harm does not mean a ‘less than substantial objection
- 16.17. For designated assets any harm identified should be assessed in terms of NPPF paras 199-202. Harm to a heritage asset is measured on a sliding scale with substantial harm being the highest. This is usually complete or almost complete loss of the asset. Everything else is described as less than substantial harm and proposals are assessed as being at the high, moderate, low or lower end of less than substantial harm or of having no harm.
- 16.18. The Site makes no contribution to the setting and significance of the Conservation Area. Whilst there will be an increase in inter-visibility, this will not have a detrimental impact. Given that Fore Street’s heritage significance is rooted in its architectural and historic interest as a commercial high street, it is not considered that the proposed development will affect this understanding and therefore cause no harm.

Angel Place (Designated heritage asset)

- 16.19. Angel Place is a terrace of mid eighteenth-century properties built as a series of three interconnected principal blocks. As a Grade II Listed Building, Angel Place is a building of national importance. Angel Place is approximately 300 metres north and west of the Application Site, across both Fore Street and the North Circular Road.
- 16.20. Section 66 of the P(LB&CA) A1990 requires us to ‘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’.

- 16.21. Paragraph 199 of the NPPF states that ‘when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance’. Less than substantial’ harm does not mean a ‘less than substantial objection
- 16.22. Given the intervening distance between the Application Site and the designated heritage asset, the Application Site makes no direct contribution to setting and significance of the group of terraces. whilst there will be a slight increase in inter-visibility from the south, this will not have a detrimental impact. It is considered that the development will cause no harm to the significance of Angel Place.

Raynham School (non-designated heritage asset)

- 16.23. Raynham Primary School, located on the southern boundary of the Application Site is a representative example of the way in which late 19th century schools were constructed in Enfield and how they have been adapted to educational needs up to the present day. Whilst there will be a change within the setting of the school, this will not harm the significance of the non-designated heritage asset. This is because residential development is appropriate in the setting of a school and the design of the scheme has mitigated any potential harm, for example the layout of the proposal has resulted in lower heights closest to the school

Summary of heritage

- 16.24. The proposals are considered to preserve the character and appearance of the Conservation Area, in line with Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990. With regards to the National Planning Policy Framework (2021), there is no harm caused to any designated heritage asset.
- 16.25. The highest degree of harm caused by the proposed development is the demolition of Beck House (a non-designated heritage asset). This will result in the total loss of significance together with harm to Scott House which would lose an important part of its setting. In weighing the application a balanced judgement will be required having regard to the scale of harm and the relative significance of the heritage asset. The significance that is harmed is that of a non-designated heritage asset(s).
- 16.26. There would also be low to medium levels of harm to the significance of Scott House, due to the group value held by the two buildings. The significance that is harmed is that of a non-designated heritage asset(s).
- 16.27. As set out by Paragraph 203 of the NPPF: 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, a balanced judgement will be required having regard to the scale of any harm or loss (in this case high harm to Beck House and low to medium harm to Scott House) and the significance of the heritage asset (in this case non-designated heritage asset). A designated asset will have more heritage significance than a non-designated asset.

16.28. The demolition of Beck House and rupture of the Scott House/Beck House group is proposed to enable a more efficient use of the Application Site, with a rationalised site plan that includes a considerable uplift in the number of much-needed homes, higher-quality and more liveable housing than exists at Beck House presently, contemporary accommodation of commercial tenants, purposeful and well-designed landscaping and recreational area, improved connectivity to surrounding streets, a design that promotes safety and several S106 contributions. The development introduces a high level of public benefit to the residents of the Application Site as well as the Angel Edmonton community. In the exercise of balance, and in line with NPPF paragraphs 201 and 203, greater weight is given to the substantial benefits afforded by the development.

Archaeology

16.29. London Plan HC1 indicates that development proposals should identify assets of archaeological significance and use this information to avoid harm or minimise it through design and appropriate mitigation.

16.30. An Archaeological Desk-based Assessment was submitted in support of this application. Historic England GLAAS were consulted on the application and advised that although little archaeology has been found in the area of the site, this may be because little archaeological work has been carried out. It is recommended that an archaeological evaluation should be carried out to fully assess the archaeological potential of the site. A condition is recommended to require, first, an evaluation to clarify the nature and extent of surviving remains, and then, if necessary, a full investigation.

17. Transport, Access and Parking

17.1. London Plan (2021) Policy 6.1 encourages partnership working in terms of transport and development that reduces the need to travel, especially by car whilst also supporting development with high levels of public transport accessibility and/or capacity. The policy supports measures that encourage shifts to more sustainable modes of transport. London Plan (2021) The London Plan 2021 Policy T1 and the Mayor's Transport Strategy set out an ambition for 80% of journeys to be made by sustainable transport modes – that is by foot, cycle or public transport – by 2041. In keeping with this approach, it is accepted that proposed development should support this aim by making effective use of land, reflective of connectivity and accessibility by sustainable travel modes. Meanwhile, the Mayor's 'Healthy Streets' driver looks to reduce car dominance, ownership and use, whilst at the same time increasing walking, cycling and public transport use.

17.2. Other key relevant London Plan policies include:

- Policy T2 – 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 – requires new development to safeguard sufficient and suitable located land for public and active transport;
- Policy T4 – 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 T5 – promotes the provision of an accessible and safe bicycle network with cycle routes and sufficient cycle parking;
 - Policy T6 – indicates that car-free development should be the starting point for all locations that are well-connected by public transport and requires parking bays for disabled persons.
 - Policy T7 – makes clear that development should facilitate safe, clean and efficient deliveries and servicing and requires Construction Logistics Plans and Delivery and servicing Plans.
- 17.3. Core Strategy (2010) policies aim to both address the existing deficiencies in transport in the Borough and to ensure that planned growth is supported by adequate transport infrastructure that promotes sustainable transport choices. Specifically, Core Policy 25 requires development to prioritise pedestrian and cycle public realm improvements that contribute to quality and safety; Core Policy 24 requires development to deliver improvements to the road network, and Core Policy 26 requires development to ensure a safe, accessible, welcoming and efficient public transport network. The underlying approach is to ensure that travel choice across the Borough is enhanced to provide everyone with the opportunity to decide how they choose to travel, be that by car, public transport or walking and cycling. Development Management Document (2014) Policy DMD 45 Parking Standards and Layout states that the Council aims to minimise car parking and to promote sustainable transport options.

Pedestrian connectivity

- 17.4. There is presently pedestrian and bicycle linking access to and through the Application Site that links into the street network. Approaching east from Raynham Road, the path into the site forks to the north and south of Scott House; the north leading to access to the North Circular Road, and the south leading to Woolmer and Upton roads. The legibility through the site and pedestrian experience is relatively poor in that sight lines are disrupted by Scott House and there is little active surveillance or animation through some sections of the routes. The application proposes to improve this condition by regularising the path through the site to one, more legible route that will serve as pedestrian, bicycle and controlled service access. Improvements to landscaping, new play features, arrangements of buildings, flow to and through the central square with commercial spaces and attractive paving will enhance the feeling of safety and create a more pleasant experience.
- 17.5. North-south connectivity is challenged by the North Circular, aided by the existing step-free footbridge with long ramps on both sides. On the southern side, within the Application Site, the condition of the footbridge will be improved with refreshed landscaping and additional greening.
- 17.6. There are pedestrian and cycle paths the length of the site along the southern side of the North Circular Road. In order to enable improvements to this stretch of public realm, these segments of paths are included in the Application Site. The proposal includes a planting strategy to 'buffer' the frontages of buildings from the North Circular Road with greenery and trees. The pedestrian path will also benefit from improved landscaping, lighting and street furniture. The applicant did address concerns with respect to sufficient surveillance of the North Circular Road path, particularly in front of the footbridge – this was improved with the addition of a window on the north side of Block E1.

17.7. In general, the application improves the pedestrian conditions through and around the Application Site.

Cycle access and parking

17.8. The site occupies an important location along an east-west cycling route between the Meridian Water and Silver Street rail stations. There are existing proposals for a greenway through the Upton Raynham area which will provide an alternative route to the existing cycle path along the North Circular. The scheme proposals to incorporate an east-west green link through the site, connecting Upton Road and Raynham Road will complement this aspiration and is welcomed.

17.9. In line with London Plan T5, the following cycle parking quantum is required as a minimum:

- Residential (134 units): 245 x long-stay, 4 x short-stay
- Commercial (188sqm): 2 x long-stay, 5 x short-stay
- Community (70sqm): 1 x long-stay (assuming max. 8 FTE staff), 1 x short-stay

17.10. The proposals include 248 long-stay spaces for residents, in secured cycle stores. While TfL advises that 20% of long-stay cycle parking be in the form of Sheffield Stands, the applicant proposes to provide 5%. Given space limitations, the inclusion of more Sheffield Stands could imply a reduction in cycle parking overall. A condition is recommended requiring the applicant to demonstrate how Sheffield Stands will be prioritised for use by those needing easier access, including children, older and disabled residents.

17.11. Short-stay cycle parking for all uses is provided, located at convenient points for all uses. A total of 24 spaces (12 Sheffield stands) are proposed. The good level of short-stay provision is welcomed. Along the North Circular, the easternmost section of the bicycle path will be diverted south slightly to allow a bank of planting and trees between vehicular lanes and the cycle path. Although short, this segment of protected lane is supported.

17.12. Long-stay parking to serve the commercial and community uses is required to have secure access control. The long-stay requirement equates to one space per commercial / community unit. A condition is recommended to require additional details to meet long-stay requirements for commercial cycle parking.

17.13. It is recommended that the final parking provision is secured by condition, with detailed drawings clearly stating the types of parking provision and dimensions for all cycle parking, in line with Chapter 8 of the London Cycling Design Standards.

Public transport

17.14. The Application Site is 500 metres from the Silver Street Overground station and 300 metres from Fore Street, the Angel Edmonton town centre. There is a bus stop on the North Circular just east of the footbridge that services the no. 33 and no. 444 bus routes. The majority of the Application Site has a PTAL rating of 5. PTAL is a rating by Transport of London of locations by distance from frequent public transport services. PTAL ratings range from 0 (the worst connectivity) to 6a/6b (the best connectivity). A rating of 5 indicates a very good level of connection to transport services.

17.15. While it is expected that the largest proportion of trips generated by the residential population on the site will rely on public transport, the transport modelling provided in the Transport Study indicates that the net increase in passengers during peak hours generated by the development will be modest and no impact is expected to public transport services.

Vehicular Access and Parking

17.16. Just as in the current condition, there is no proposed provision for general vehicular traffic through the site. Controlled service access is provided from Raynham Road, north of Scott House, through the central square and onto Woolmer Road or Upton Road. The only other vehicle access onto the site is from the junction of Woolmer Road and Upton Road onto the ramp to the under-podium parking west of Scott House. This arrangement, which gives precedence to pedestrian and cycle access through the site is supported.

17.17. The new development is proposed to be car-free. There is no provision of new parking for occupants of the new housing, commercial or community facility floorspace. The parking within the site boundary is proposed to be re-provided as follows:

Reprovision of parking

	Existing	Proposed	Difference
Scott House	32*	23	-9
Upton Road north	37	23	-14
Upton Road south	19	18	-1
	88*	64	-24*

* While there are garages with 32 spaces presently beneath Scott House, they were deemed not to comply with current garage size standards and have been inaccessible for a number of years.

17.18. As the above table indicates, there is proposed a rearrangement of existing parking to construct new parking facility beneath the podium west of Scott House and re-organise parking bays along the north and south sides of Upton Road. The 18 proposed spaces on the south side of Upton Road include four Blue Badge bays for disabled users. While the table reflects a net loss of 24 parking spaces within the Application Site boundary, it should be understood that 32 of the spaces in the undercroft of Scott House have been inaccessible and unused for a number of years due to not meeting current standards. Therefore, the construction of 23 spaces beneath the podium implies a de facto gain of eight usable spaces on the site, and no practical loss of spaces resulting from the development. A condition is recommended to restrict the use of under-podium parking to just Scott House residents as access from the parking facility will be via Scott House stair cores.

17.19. Notwithstanding the favourable approach to not introducing new parking on the site for new development occupants, an assessment of parking stress levels in the area reveals that, with the proposed development and changes to parking provision, the level of parking stress is at 85%, the highest acceptable level. To address this, the application includes the following mitigation measures:

- High quality cycle parking
- Improved public realm and permeability
- No parking permits issued to future residents

- Funding towards a CPZ (Controlled Parking Zone)

17.20. These forms of mitigation are welcomed. The applicant proposed a contribution to a CPZ on the condition that a post-6-month-occupancy parking survey indicated that the level of parking stress rose above 85%. Given the amount of floorspace proposed and that the stress level is already at 85%, it is therefore recommended to secure by S106 a two-part contribution to the CPZ:

- Contribution towards CPZ consultation at commencement
- Contribution towards design and implementation at conclusion of consultation, if successful

17.21. With this form of CPZ obligation, the parking proposal is acceptable.

Electrical Vehicle Charging

17.22. Active charging spaces are proposed for five spaces in Scott House, and four on Upton Road. This total of 9 Electrical Vehicle Charging points exceeds the 20% requirement for active charging which is supported. The remainder of new spaces are passive to allow for future provision of EVC points if necessary. A condition is recommended to secure EVC provision.

Delivery and Servicing

17.23. As described above, the link between Upton Road and Raynham Road is proposed to be controlled as a Pedestrian Priority Route, closed to general traffic but providing a one-way route for refuse, fire and emergency vehicles only. These vehicles would access the site from Raynham Road and travel eastbound. Bollards are proposed at the eastern end of the route, on Upton Road and within public highway. Control will still be needed at the western entrance from Raynham Road. It is recommended that an obligation is secured via S106 for the consultation and implementation of Traffic Management Orders with access restrictions and ANPR from Raynham Road into site.

17.24. A delivery and drop-off bay is provided at the western end and north side of Upton Road. It will service residential and commercial deliveries. An Outline Delivery and Servicing Plan has been included within the TA. It finds that the proposed bay on Upton Road will provide enough capacity to accommodate the expected residential servicing demand. A condition to secure a detailed Delivery and Servicing Plan is advised.

Healthy Streets and Active Travel Zone Assessment

17.25. The application includes a Healthy Streets Transport Assessment and table 3.3 of the assessment sets out the development's position against the ten Healthy Streets Indicators. The assessment provided indicates that the proposed improvements onsite will improve upon the current arrangements.

17.26. Looking at wider connectivity by walking and cycling, the Active Travel Zone assessment considers access to key destinations at the neighbourhood scale. A common improvement recommended across all routes is the promotion of sustainable travel to reduce traffic. There are additional suggestions for tree planting along the route to Fore Street. In sum, officers are satisfied that the application proposes a car-free development with public realm and key route

improvements, cycle parking and enhanced landscaping. These measures contribute to improving cycling and walking conditions, and addressing many of the recommendations in the assessment. In all, officers are satisfied that the development positively supports Healthy Streets aims.

Travel Plan

- 17.27. A Travel Plan will be secured via an appropriate planning obligation within the shadow S106 Agreement inclusive of an agreed contribution of £5,000 which should form part of planning obligations within the S106 Agreement.

Construction Logistics Plan

- 17.28. An Outline Construction Logistics Plan has been included within the TA and is acceptable in principle. Due to the proximity of the school, deliveries should be prohibited activities. It is recommended that a detailed CLP is secured by condition to ensure deliveries are restricted during school pick-up and drop-off times, and that the applicant engage with the Edmonton Islamic Centre before submission.

18. Sustainability and Climate Change

- 18.1. 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.
- 18.2. London Plan Policy SI 2 (Minimising Greenhouse Gas Emissions) sets out the new London Plan's 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.
- 18.3. London Plan Policy SI 2(C) 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.
- 18.4. London Plan Policy SI 4 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.
- 18.5. NPPF Paragraph 157 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

Minimising Greenhouse Gas Emissions

- 18.6. An Energy Assessment (November 2021) has been prepared which provides an overview of the energy and sustainability strategies for the proposed development. The document demonstrates how the proposal has sought to meet London Plan requirements inclusive of the energy hierarchy and relevant Council policies.
- 18.7. The assessment outlines that the development will achieve a reduction in energy demand through several efficiency measures that include insulated building fabric with low permeability; glazing with suitable U-value, g-value and daylight transmittance; mechanical ventilation with heat recovery and low energy lighting. These measures will achieve an overall improvement of 12% over Part L 2013, exceeding the London Plan target of 10%.
- 18.8. To address cooling and overheating, the assessment sets out a strategy to meet the cooling hierarchy and mitigate overheating risk using:
- Passivhaus principles with high levels of insulation
 - Glazing with low g-value
 - External shading using canopies and grating
 - Minimising heat generation with LED lighting, insulated pipework, location of utility cupboards
 - Increased ceiling heights and thermal mass
 - Passive ventilation
 - Mechanical Ventilation with Heat Recovery (MVHR) will be provided to all dwellings
- There are rooms that have been identified as at a risk of overheating; these are single aspect north facing bedrooms and kitchen/dining rooms and corner flats that have no southern facing elevations and, as such, cannot rely on openable windows for purge ventilation. These rooms and flats will be equipped with mechanical cooling to comply with criteria.
- 18.9. The development proposes to connect to the Enfield District Heat Network operated by Energetik. The assessment indicates that the connection to the DEN achieves a further 72% reduction in site total CO₂ emissions.
- 18.10. The proposed development will maximise the amount of PV located on roof spaces of the residential elements.
- 18.11. The proposed development achieves a 92.6% improvement in CO₂ emissions over Part L 2013 through onsite measures and would meet the GLA planning policy target for reduction in regulated CO₂ emissions. London Plan Policy SI 2 stipulates that where a zero-carbon target cannot be fully achieved on site, a carbon off-set contribution is required. A carbon off-set contribution has been agreed on the proposed development and is secured through the shadow S106 Agreement.
- 18.12. In order to ensure that the development is net zero-carbon and built in accordance with the submitted energy strategy, conditions are recommended that

the development is constructed in accordance with Energy Statement (November 2021) and that prior to the commencement of development, a technical note is submitted confirming how this development will meet the zero-carbon policy requirement in line with the Energy Statement, and prior to occupation, an Energy verification report confirming that the development has been built in accordance with the details submitted.

- 18.13. The application additionally includes a Whole Life-cycle Carbon Assessment. London Plan Policy SI2 encourages non-referable applications to prepare an assessment and demonstrate how the development will reduce life-cycle emissions. As many measures rely on detailed design, the submitted assessment sets out principles and assumptions for limiting the development's full carbon impact. A condition is recommended that, prior to commencement of development, a technical note is provided that includes detailed targets, measures and evidences how targets will be achieved.

Circular Economy

London Plan Policy SI 7 promotes circular economy outcomes and net zero-waste in new development. Applications should demonstrate how they will:

- re-use or recycle materials from demolition and remediation works
- reduce material demands and enable building materials, components and products to be disassembled and re-used at the end of their useful life
- provide opportunities for managing as much waste as possible on site
- support recycling and re-use
- accord with the waste hierarchy
- monitor and report performance

The application includes a Circular Economy Statement (October 2021). The statement sets out circular economy goals and a strategic approach to achieving them on site. A condition is recommended that prior to occupation, the applicant shall provide a post-completion report setting out the predicted and actual performance against all numerical targets in the relevant Circular Economy Statement.

Site Waste Management Plan

The NPPF refers to the importance of waste management and resource efficiency as an environmental objective. Policy SI7 of the London Plan encourages waste minimisation and waste prevention through the reuse of materials and using fewer resources whilst noting that applications referable to the Mayor should seek to promote circular economy outcomes and aim to achieve net zero-waste. At a local level, policy CP22 (Delivering Sustainable Waste Management) of the Core Strategy sets out that in all new developments, the Local Planning Authority will seek to encourage the inclusion of re-used and recycled materials and encourage on-site re-use and recycling of construction, demolition and excavation waste.

A Preconstruction Site Waste Management Plan (November 2021) was submitted as part of the application. The scope of this plan concerns construction, excavation and demolition materials. Matters relating to operational waste and waste servicing are not considered within the scope of the plan. The report includes estimates of waste arising from construction of buildings. It is understood that these calculations are approximations based on available information. The application also includes a Pre-demolition Site Waste Management Plan that details the amount of waste resulting

from demolition of existing structures to enable development; this is based on structural audit and sets out targets for waste that will be retained and re-used on site and waste that will be recycled. Given that further information related to construction waste will emerge as details of the proposal are development, a condition is recommended for a Site Waste Management Plan to monitor targets and set out a strategy for operational and servicing waste management.

19. Environmental health

Air quality and pollution

- 19.1. Policy SI1 of the London Plan set out the requirements relating to improving air quality. These Policies require Development Proposals to be at least Air Quality Neutral and use design solutions to prevent or minimise increased exposure to existing air pollution. Furthermore, the Policies require developments to consider how they will reduce the detrimental impact to air quality during construction and seek to reduce emissions from the demolition and construction of buildings.
- 19.2. At a national level, 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.
- 19.3. Finally, at a local level, policy DMD65 of the Development Management Document requires development to have no adverse impact on air quality and states an ambition that improvements should be sought, where possible.
- 19.4. Enfield's environmental health officer has reviewed the submitted Air Quality Assessment. The Assessment considers the location of the proposal on the North Circular Road and examines any risk to occupiers associated with air quality conditions at the location. The officer accepts the result of the Assessment that in the anticipated year of occupation, end of 2024, the levels of measured pollutants (NO₂, PM₁₀ and PM_{2.5}) are well below the baseline thresholds and air quality at the location will be acceptable.
- 19.5. The Air Quality Assessment puts forward suitable measures to control construction dust. These measures must be implemented to effectively control dust. Further, a condition is needed to that all non-road mobile machinery (NRMM) complies with emission standards.
- 19.6. Further, a condition is recommended requiring that an investigation and assessment of the extent of contamination is submitted to officers for consideration.

Noise

- 19.7. The acoustic assessment proposes suitable glazing for the facades of the development. The report also discusses ventilation for overheating and as the development is in an area of high ambient sound the facades identified in the acoustic report as being anticipated to be exposed to sound levels above 48dB LAeq, 8hr at night must be provided with mechanical ventilation to allow sufficient cooling of their dwellings without having to open windows. Windows must still be openable to allow purge ventilation.

- 19.8. A condition is recommended to ensure that noise from mechanical plant does not cause an unacceptable loss of amenity to residents.
- 19.9. In terms of outdoor acoustic conditions, the Noise Assessment finds the level of noise are acceptable throughout the site with the exception of two points of access onto the Application Site nearest the North Circular Road. The entrance to the east of Block E1 onto the public square and the entrance further west to the east of Block A both measured levels of noise that exceed comfortable use. Mitigation has been designed into the plan. In the western area, a wall and climbable berm that is part of a small play space helps to block excessive noise. Adjacent to Block E1, the entrance will include a screening structure that will also mitigate noise – this structure is yet to be fully designed and as such, a condition is proposed that this screening is designed with further advice from officers.

Wind

- 19.10. The submitted Pedestrian Level Wind Desk-Based Assessment finds that during the windy season, the vast majority of the site is comfortable for sitting and standing. A band that wraps the west and south side of Scott House is comfortable for strolling. Overall, this level of wind is deemed to be acceptable.

20. Flood Risk and Drainage

- 20.1. London Plan Policy SI 12 outlines development proposals should ensure that flood risk is minimised and mitigated, and that residual risk is addressed. Policy SI 13 outlines that development proposals should aim to achieve greenfield run-off 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.
- 20.2. Core Strategy Policies CP21, CP28 and CP29 and Development Management Document 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 Urban Drainage Systems (SuDS).
- 20.3. The Site falls mostly within Flood Zone 1, where there is a low risk of flooding from ground water, sewers and overland flows, however there are areas to the centre and west which fall within Flood Zone 2, and smaller areas which are within Flood Zone 3 where the risk of flooding is higher.
- 20.4. The proposed development overhauls the existing site plan and landscape arrangement. SuDS measures including rain gardens, swales, detention basins and blue/green roofs are proposed to be incorporated within the design. Whilst this is strongly supported by officers, there is still extensive use of below ground attenuation. The design approach should utilise above ground storage for primary attenuation, with below ground storage only for supplementary attenuation if required. On that basis, an appropriate condition should be attached to secure a detailed SuDs Strategy to allow for further consideration of above-ground attenuation. With the proposed condition, the SuDs officer has no objections to this element of the proposal.
- 20.5. With respect to flood risk, the applicant has submitted a Flood Risk Assessment (FRA) which assessed possible sources of flood risk in respect of London Plan

Policy SI12 and SI13. Originally, both the Environment Agency and the Council's SuDS officers issued objections due to 1) concern that the proposal is within 8 metres of a culverted watercourse, the Pymmes Brook and 2) insufficient information, and specifically, questions around the appropriateness of the flood model used to carry out the FRA. Following the submission of additional information, the EA advised that the objection due to the location of the development can be removed. The EA is conducting further assessment of the model to make a final determination on flood risk. SuDS officers have reviewed details of applicable flood models and advise:

- The model takes into account a retaining wall surrounding the Angel Community Centre, which is demonstrated to have flood risk benefits to the site. Detailed information regarding the wall has not been provided. A condition is recommended (as below) requiring further details of the wall to fully understand the flood risk benefit. Further, if the wall provides essential flood risk benefit, then a S106 obligation would be required to ensure its retention and future maintenance, or equivalent reinstatement.
- Buildings at the westernmost end of the site, including Block A1, have been designed with Finished Floor Level below predicted flood levels as these units are to be fully accessible and step free. There is a similar condition at Scott House, although it is an existing building. SuDS officers accept this condition on the basis that the flooding likelihood of the 1 in 100 year plus climate change flood event is rare and that a condition is included requiring further assessment of whether flood resilient or resistant measures should be included here and if a flood evacuation plan is required.

20.6. SuDS officers further recommend the following conditions to render the proposal acceptable:

- Prior to commencement, details of the Sustainable Drainage Strategy
- Prior to commencement, a Flood Risk Technical Note with details of the retaining wall and finished floor levels
- Prior to occupation, a Verification Report demonstrating that the approved flood risk management and SuDS measures for that phase have been fully implemented

21. Socio-economics and Health

Socio-economics

21.1. London Plan CG5 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.

21.2. Core Strategy Policy 13 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.

- 21.3. To help ensure that Enfield residents are able to take advantage of this beneficial effect of the scheme, it is recommended that the Shadow S106 agreement secures employment and skills obligations in accordance with the S106 SPD.

Health Impact Assessment

- 21.4. London Plan Policy GC3 outlines that to improve Londoners' health and reduce health inequalities, those involved in planning and development must adhere to an outlined criteria.
- 21.5. This application is accompanied by a Health Impact Assessment. The assessment outlines health profile baselines which have informed impacts of the proposed development. Overall, the assessment concludes that the proposed development will generally have a positive impact on the health of the future and local residents.
- 21.6. The outcomes set out within the Health Impact Assessment aim to demonstrate that the proposed development has incorporated a number of measures into the design to ensure its impact on health is as positive as possible throughout both the construction and operational phases. Officers agree with the conclusions set out, and for reasons set out within this report, are of the view that the development takes steps to address Policy GC3's outlined criteria. As recommended by policy, the Healthy Streets approach has been utilised to inform the Transport Assessment and shape the manner in which the design development of the scheme has come forward. Landscaping and public realm improvements that this scheme will deliver, as well as the promotion of more sustainable forms of transport through the introduction of cycle parking to the site, cumulatively, in officers' view, result in benefits to both existing residents of the estate, and future occupiers of homes proposed.

22. Shadow S106 Heads of Terms

- 22.1. In setting out financial contributions to be secured through a S106 Agreement, the applicant has prioritised the delivery of affordable housing across the proposed development. As a consequence, it is stated that without compromising the viability of the applicant being in a position to bring forward the proposed development, the applicant is not in a position to address all identified requirements of the adopted Enfield S106 Supplementary Planning Document (SPD). The table below outlines the Heads of Terms of financial and non-financial contributions to be secured within a S106 Agreement:

Heads of Terms	Description	Sum
Affordable Housing	Accommodation Schedule confirming the number, mix and tenure of affordable homes.	£0
Design	Retention of project architect.	£0
	Design monitoring costs.	£0
Education	Contribution towards improved education provision.	£339,690
Employment & Skills	Employment and Skills Strategy.	£0
Energy	Carbon Offset Payment towards the Carbon Offset Fund	£32,077
	Connection to Energetik district heat network.	£0
	Monitoring ('Be Seen' – GLA Energy Monitoring Portal).	£0
Epping Forest SAC	SAMMS contribution	£1,876
	Additional mitigation measures.	£4,500
Health Services	Contributions towards health facilities and services.	£74,920

Open Space	Contribution towards provision of play space off-site.	£200,000
Public Realm	Maintenance Plan	£0
Flooding	Retention and maintenance of flood wall; equivalent reinstatement	£0
Transport	Travel Plan.	£0
	Travel Plan monitoring.	£5,250
	CPZ consultation contribution at commencement.	£10,000
	CPZ TMO and implementation contribution at conclusion of consultation.	£23,000
	Raynham Road TMO consultation and implementation	£0
	Highway works, including dropped kerb and tactile surface provision at four locations	£0
	Total	£691,313

23. Community Infrastructure Levy (CIL)

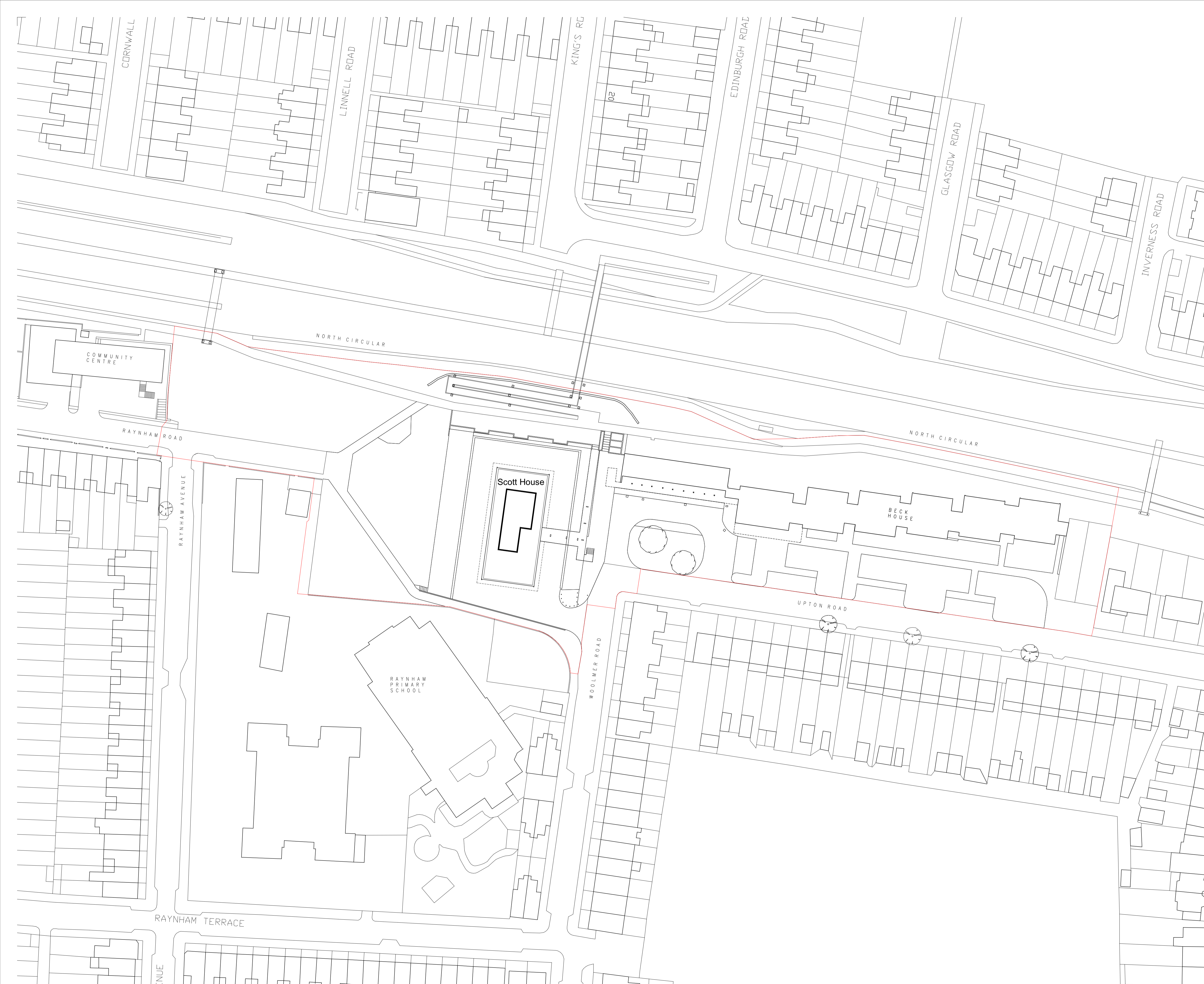
- 23.1. Both Enfield CIL and the Mayor of London CIL (MCIL) would be payable on this scheme to support the development of appropriate infrastructure.
- 23.2. In line with the applicant's CIL liability form, the amount of MCIL owed is £672,312. The amount of Enfield CIL owed is £448,608. This calculation factors the deduction of Beck House floorspace as the description of development includes the demolition of Beck House. Should Beck House be demolished pursuant to the determination of prior approval, the CIL liability would be revised. The development of social housing is exempt from MCIL under the 2008 Act. A formal determination of the CIL liability would be made when a Liability Notice is issued should this application be approved.

24. Conclusion

- 24.1. The application proposes an intensification of the established residential use on previously developed land that has been identified for additional housing growth. The proposal exceeds LBE's adopted affordable housing target of 40% and the London Plan's target of 50% with an offer of 69% affordable units.
- 24.2. There is a pressing need for housing, including affordable housing, and Enfield has a challenging 10-year housing delivery target. This application proposes 134 new, high-quality homes. The scheme will deliver 53 family-sized homes.
- 24.3. The applicant has engaged with the LPA in undertaking extensive pre-application advice inclusive of the development being presented to the Enfield Place and Design Quality Panel. The pre-application process involved the applicant considering design options to determine the most appropriate forms of development and the scheme proposed has followed a design-led approach to site optimisation, as per London Plan Policy D3.
- 24.4. The scheme delivers substantial benefits on site for both existing and new site residents, as well as surrounding Edmonton communities. Landscaping and public realm are enhanced to create safer, greener and more pleasant connections with local streets. The development results in the introduction on site of cycle parking, play space and communal amenity space, as well as contributions towards improvements to nearby parks. The entrance to Scott House is arranged to be more accessible and creates a feature of the centre of

the site. New commercial units and a community hall will better serve local residents.

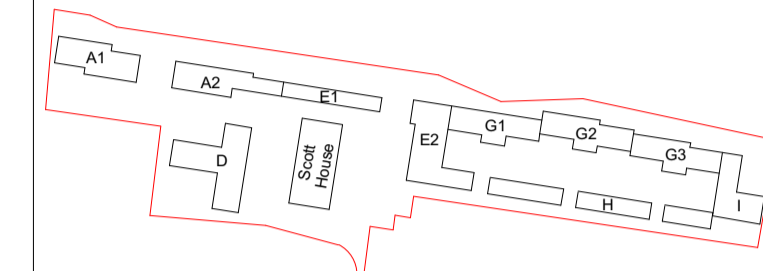
- 24.5. The development is concluded by officers, for reasons set-out within this report, to broadly accord with the adopted policy framework as well as relevant emerging policy. Subject to the appropriate mitigations as set out within the recommended condition schedules, and within the shadow Section 106 Agreement, the application is recommended for approval.



Notes

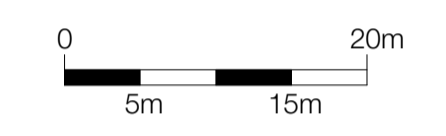
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KEY

■ ■ ■ ■ Site boundary



P1 09/11/2021 Planning Submission RF
 Rev Date Description Drawn / Checked

Project name

**Upton and Raynham
Enfield**

Drawing number Rev

3736 - LB - 00 - XX - DR - A - 102000 **P1**

Drawing

Existing Site Plan

Purpose of issue Date

Planning 02/11/21

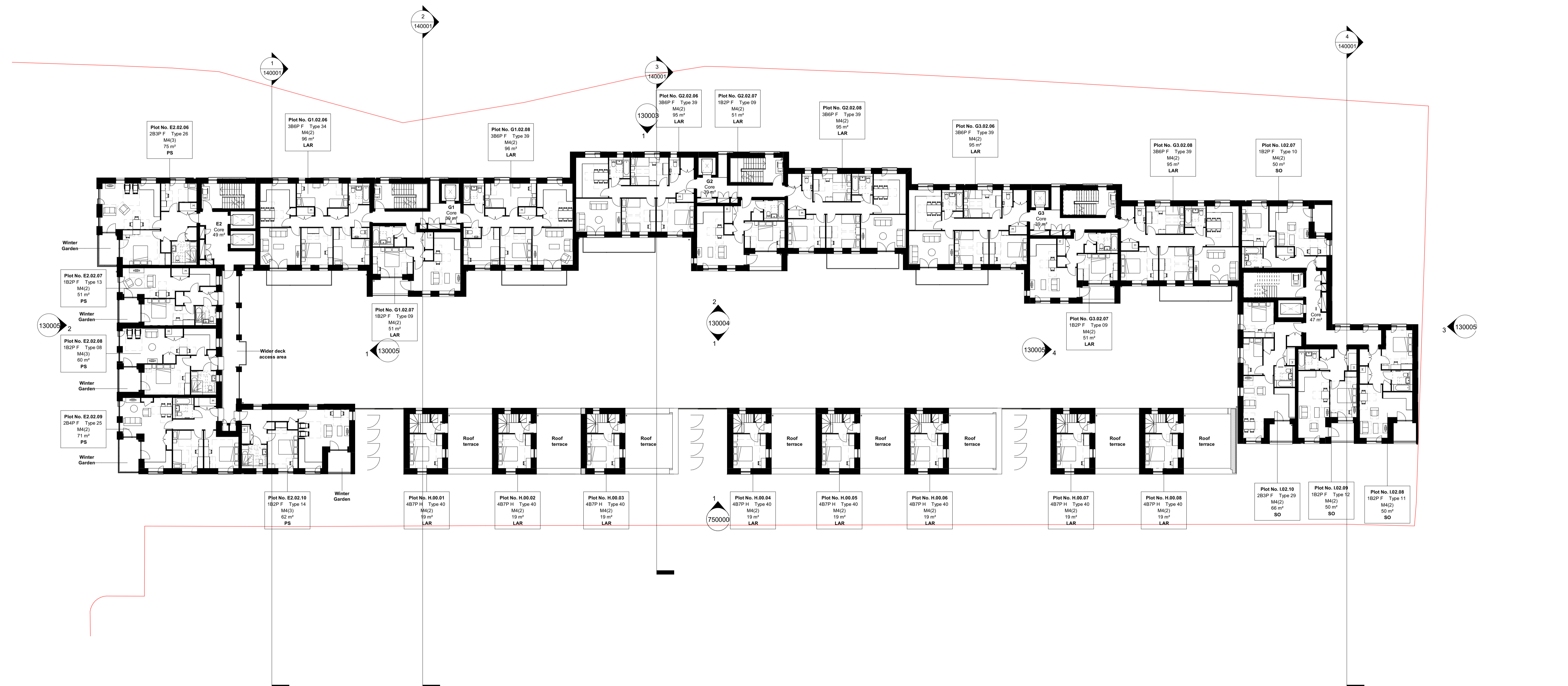
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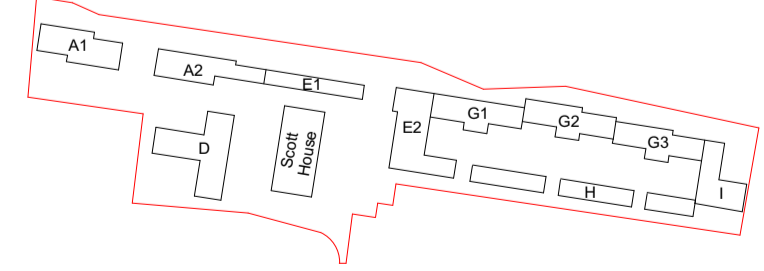
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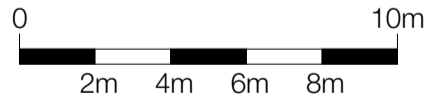
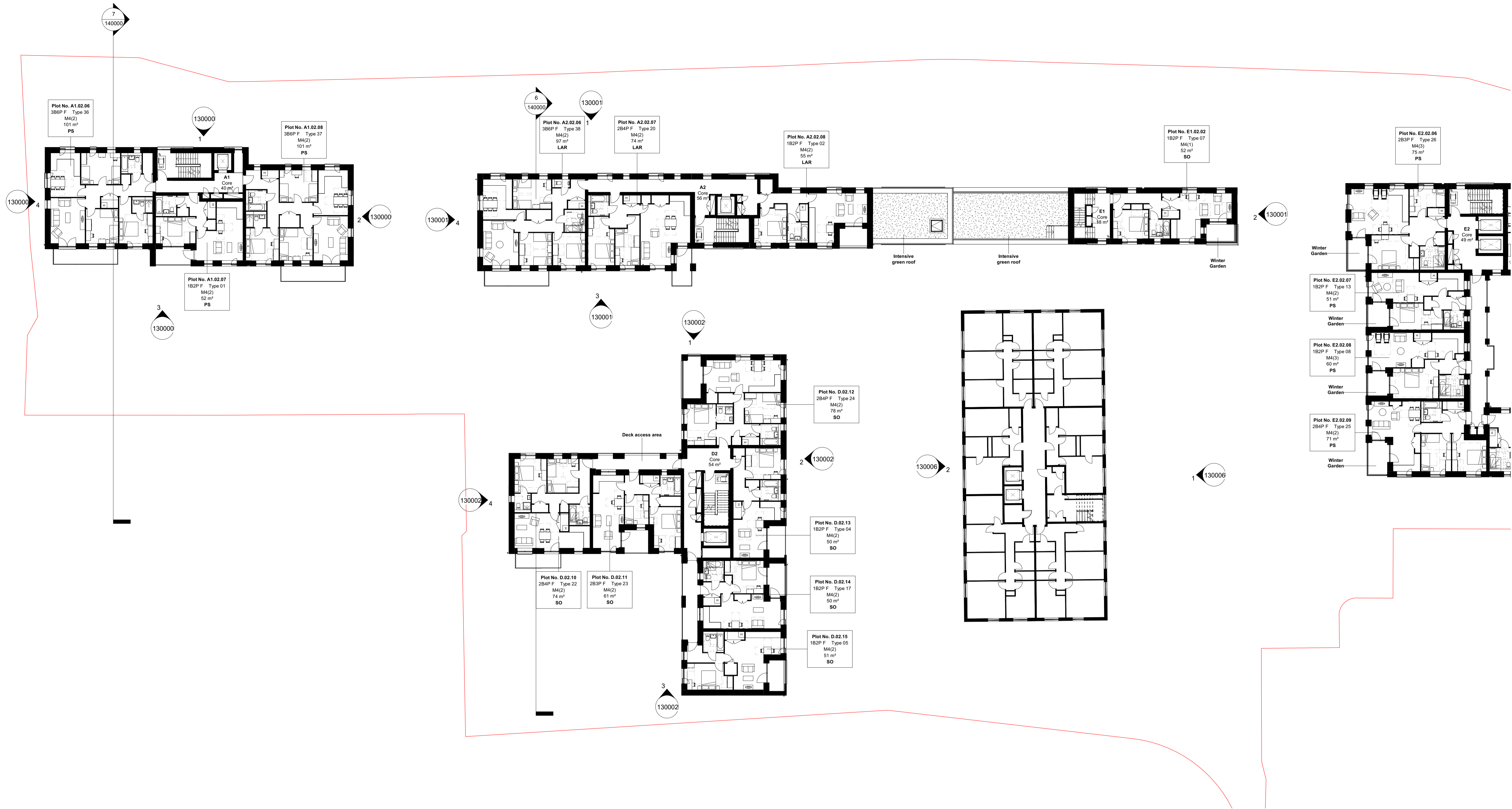
F=Flat
M= Maisonette
H= House

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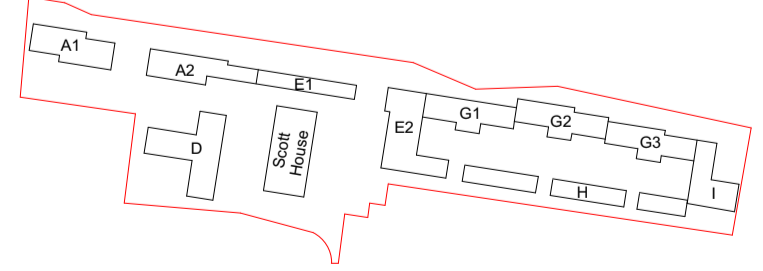
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Upton and Raynham Enfield			
Drawing number		Rev	
3736 - LB - 00 - 02 - DP - A - 120006		P3	
Drawing Proposed Second Floor Plan - Level 02 (1 of 2)			
Purpose of issue		Suitability Code	
Planning			
Scale		Date	
1 : 200 @ A1		02/11/21	
Client		Rev	
LB of Enfield		Date	
P3 28/01/2022 Houses levels updated to reflect terrace buildup		GC	
P2 19/11/2021 Planning Submission		RF	
P1 09/11/2021 Planning Submission		RF	
Rev		Date	
Description		Drawn / Checked	
		LB of Enfield	

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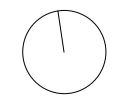


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Project name	Upton and Raynham		Levitt Bernstein levittbernstein.co.uk
Drawing number	Enfield		
Drawing	3736 - LB - 00 - 02 - DP - A - 120007	P2	
Purpose of issue	Proposed Second Floor Plan - Level 02 (2 of 2)		
Scale	1 : 200 @ A1	Date	02/11/21
Client	LB of Enfield		

P2	19/11/2021	Planning Submission	RF
P1	09/11/2021	Planning Submission	RF
Rev	Date	Description	Drawn / Checked

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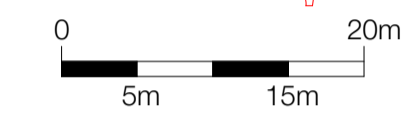
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P3	28/01/2022	Cycle store doors widened, gates added to eastern courtyard	GC
P2	19/11/2021	Planning Submission	RF
P1	09/11/2021	Planning Submission	RF
Rev	Date	Description	Drawn / Checked

Project name

**Upton and Raynham
Enfield**

Drawing number	Rev
3736 - LB - 00 - GF - DR - A - 110001	P3

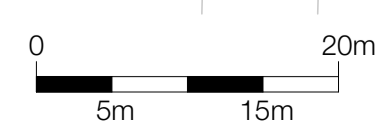
Proposed Site Plan

Purpose of issue	Date
Planning	02/11/21
Scale	Client
1 : 500 @ A1	LB of Enfield

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1 Sitewide section AA
1 : 500



2 Sitewide section BB
1 : 500

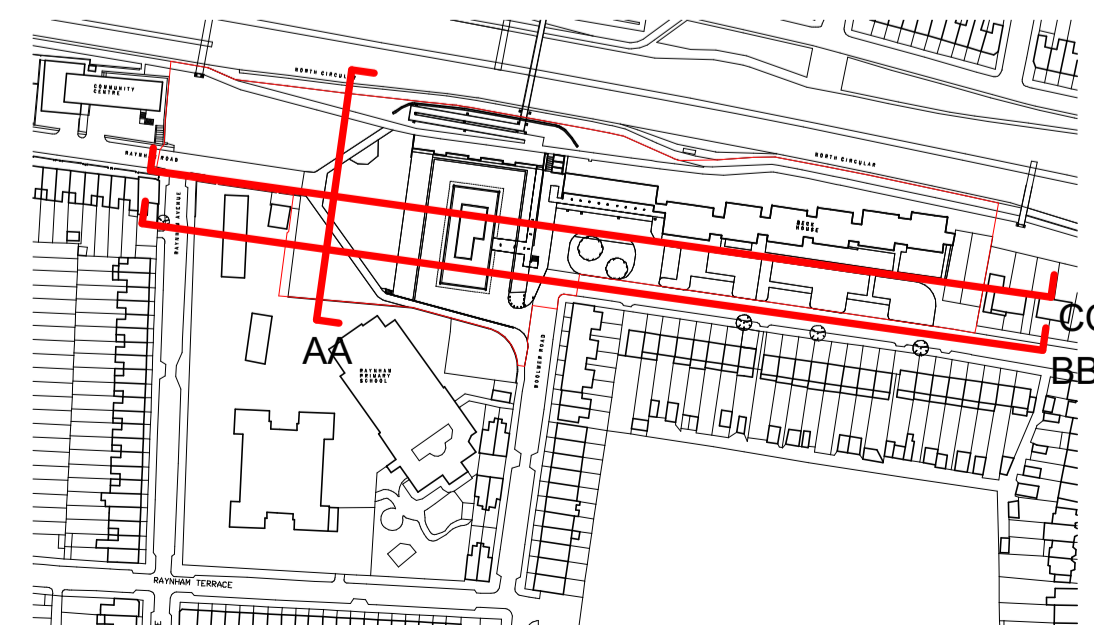


3 Sitewide section CC
1 : 500

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Project name

**Upton and Raynham
Enfield**

Drawing number Rev

3736 - LB - 00 - XX - DE - A - 115000 P3

Drawing
**Proposed Site Wide Elevations /
Sections**

Purpose of issue Suitability Code

Planning

Scale Date

As indicated @ A1 02/11/21

Client Drawn / Checked

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Rev	Date	Description	Drawn / Checked
P3	28/01/2022	Texture and colour added to elevations	GC
P2	19/11/2021	Planning Submission	RF
P1	09/11/2021	Planning Submission	RF



1 Sitewide Section DD
1 : 500



2 Sitewide Section EE
1 : 500



3 Sitewide section FF
1 : 500

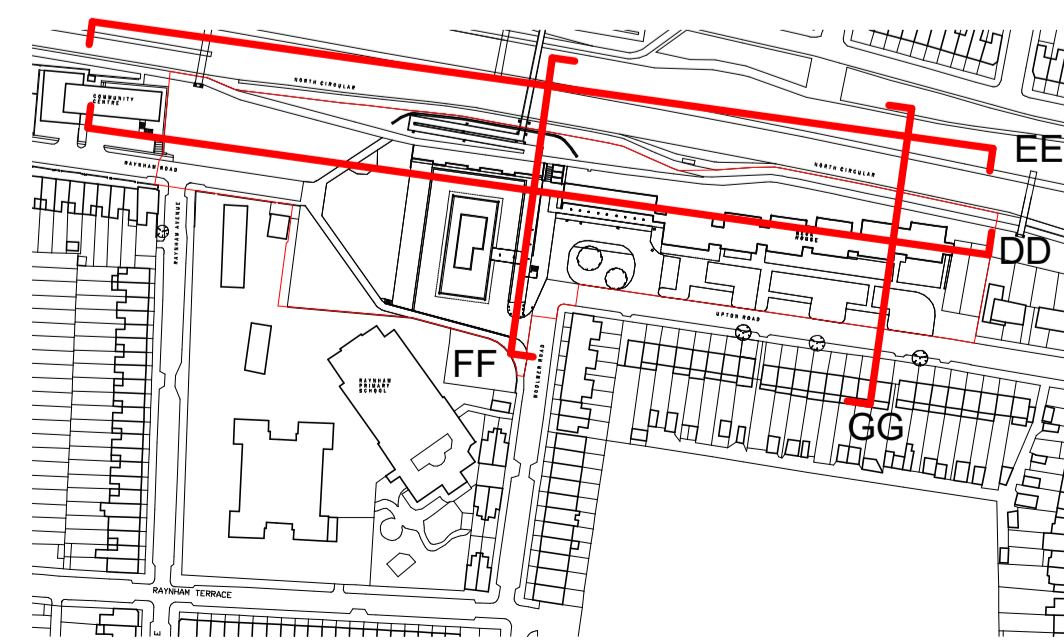
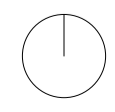


4 Sitewide section GG
1 : 500

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Project name

Upton and Raynham
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Drawing number Rev

3736 - LB - 00 - XX - DE - A - 115001 P3

Drawing
**Proposed Site Wide Elevations /
Sections 2**

Purpose of issue Suitability Code

Planning

Scale Date

As indicated @ A1 11/05/21

Client Drawn / Checked

LB of Enfield

Rev	Date	Description	Drawn / Checked
P3	28/01/2022	Texture and colour added to elevations, window added to Unit 1	GC
P2	19/11/2021	Planning Submission	RF
P1	09/11/2021	Planning Submission	RF

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- GENERAL**
 - Red line boundary
 - Indicative route for emergency vehicles
 - Existing level
 - Proposed level
 - 1:3 slope banks
- MATERIALITY**
 - Permeable flow reinforced artificial stone paving base 800x700mm and 800x600mm colour and finish to match existing standards
 - Asphalt (cycle path) colour to match existing
 - Permeable self-bonding gravel
 - Wash coat
 - Flushed concrete path light grey colour
 - Pre-cast concrete slabs on grass dimensions to later detail, light grey colour
 - Permeable pre-cast concrete pavers 300x100mm and 100x100mm, warm greyboard colour, staggered alternating pattern
 - Permeable pre-cast concrete pavers (parking bay) neutral colour
 - Asphalt driveway colour to match existing
 - Tarmac with rolled aggregate colour to match concrete self-paving at square
 - Permeable pre-cast concrete self-paving 330x240x3 colour grey mix (light mist effect), herringbone bond pattern
 - Reinforced mesh colour to later detail
 - Granite slab blocks light grey colour
 - Granite slab gable dimensions to later detail, light grey colour
 - Granite slab base with boulders dimensions and colour to later detail
- PLANTING**
 - Existing planting
 - Planting, refer to Planting Plan
 - Planting in raised planter, refer to Planting Plan
 - Linear dry water, refer to Planting Plan
 - Existing tree to be retained
 - Existing tree to be removed
 - Proposed tree planting medium size, refer to Planting Plan
 - Proposed tree planting small size, refer to Planting Plan
 - Proposed multi-stem bush, refer to Planting Plan
- FURNITURE**
 - Standard bench, refer to DAS
 - Bespoke seating strip, refer to DAS
 - Concrete bench family, refer to DAS
 - Bifacial cycle stand, refer to DAS
 - Steel planter edge, refer to DAS
 - Steel planter box, refer to DAS
 - Steel raised planter with integrated seating edge, refer to DAS
 - Traffic dropped bollard, refer to DAS
 - Electric vehicle street charging post
 - Dry rear mat, refer to Architectural drawings
 - Communal bike storage with secure roof, refer to DAS
 - Cycle store with secure roof, refer to DAS
 - Bin store with secure roof, refer to DAS
- BOUNDARY TREATMENTS**
 - Steel gate, refer to DAS height 2100mm
 - Steel fence, refer to DAS height 1100 to 2100mm
 - Steel fence, refer to DAS height 400mm
 - Steel fence located on top of steel raised planter, refer to DAS height 400mm
 - Brick wall with fence steel top, refer to DAS total height 2100mm
- LIGHTING**
 - Light pole with top lantern, refer to DAS
 - Light pole with multiple spotlights, refer to DAS
 - Bollard, refer to DAS
 - In-ground luminaires, refer to DAS
- PLAY EQUIPMENT**
 - Slipping top, FSC certified timber
 - Climbing net, FSC certified timber and rope
 - Plank bridges with integrated see-saw, FSC certified timber and rubber
 - Log with balancing rope, FSC certified timber
 - Slide stainless steel
 - Rockboulders
 - Slipping stones, concrete
 - Reclaimed timber log
 - Slipping stones, steel
 - Slipping element, to later detail
 - Slipping rubber mat surface with steel inserts, to later detail

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Sheet/Sheets		Phase	Planning Version
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