

LONDON BOROUGH OF ENFIELD

PLANNING COMMITTEE

Date: 11 March 2022

Report of:
Head of Planning

Contact Officer:
Andy Higham
David Gittens
Fidel Miller

Ward:
Southbury

Application Number: 20/03011/FUL

Category: Major dwellings

LOCATION: Moorfield Family Centre 2 Moorfield Road Enfield EN3 5PS

PROPOSAL: Demolition of the existing building and the erection of a new residential development (Class C3) with associated works including hard and soft landscaping, car and cycle parking and amenity space. (Revised Description)

Applicant Name & Address:
Social Housing Plus Moorfield Road Limited

Agent Name & Address:
Matthew Lloyd-Ruck
Savills

RECOMMENDATION:

That planning permission be REFUSED .

1. **Note for Members**

- 1.1 Although a planning application for this type of development would normally be determined under delegated authority where recommended for refusal, in the interests of transparency given the scale of development, the application is reported to the Planning Committee for determination.

2. **Recommendation**

- 2.1 The Head of Development Management be authorised to REFUSE planning permission for the following reasons:

1. The development by virtue of its size, bulk, massing, proximity and siting to neighbouring occupiers would give rise to an unneighbourly loss of sunlight and daylight and unneighbourly sense of enclosure, as perceived from neighbouring properties including Nos.4 – 16 Moorfield Road, 1 to 43 Moorfield Road and 253 to 273 Hertford Road, causing harm to the occupiers residential amenity, which having regard to housing need, the presumption in favour of approving sustainable development and the tilted balance would not be outweighed by the public benefits of delivering new residential accommodation including affordable residential accommodation, contrary to Policies D3 of the London Plan (2021), CP4 and CP30 of the Enfield Core Strategy (2010), DMD8, DMD10 and DMD11 of the Enfield Development Management Document (2014) and the policies of the National Planning Policy Framework 2021 taken as a whole.
2. The proposed development, by virtue of its siting, bulk, mass, lack of defensible space, poor quality outlook and proximity to existing and proposed replacement trees represents an overdevelopment of the site and having regard to housing need, the presumption in favour of approving sustainable development and the tilted balance, fails to satisfactorily integrate with its surroundings negatively impacting on the enjoyment, function and safety of surrounding spaces, detrimental to and out of keeping with the character and appearance of the surrounding area which would not be outweighed by the public benefits of delivering new residential accommodation including affordable residential accommodation. would cumulatively result in sub-standard accommodation and be harmful to the amenities of future occupiers,

contrary to Policy D6 of the London Plan 2021, the Nationally Described Space Standards 2015, Policies CP4 and CP30 of the Enfield Core Strategy 2010, Policy DMD6, DMD8 and DMD37 of the Enfield Development Management Document 2014

3. The proposed development, in the absence of a legal agreement securing contributions to the extension of the controlled parking zone, would contribute unacceptably to parking congestion in the surrounding area which would give rise to conditions prejudicial to the free flow and safety of vehicular traffic and pedestrians, and promote the use of non-sustainable modes of transport, contrary to Policies T6 of the London Plan 2021, Policy CP25 of the Enfield Core Strategy 2010, Policies DMD45, DMD47 and DMD48 of the Enfield Development Management Document 2014
4. The proposed development, by reason of its impact upon the preserved trees and the loss of B category trees at southern end of the application site would result in harm to amenity which having regard to housing need, the presumption in favour of approving sustainable development and the tilted balance would not be outweighed by the public benefits of delivering new residential accommodation including affordable residential accommodation contrary to Policies DMD37 and DMD80 of the Enfield Development Management Document (2014), CP30 of the Enfield Core Strategy (2010), G7 of the London Plan (2021), the National Planning Policy Framework 2021 as a whole and the British Standard for Trees in relation to design, demolition and construction (BS 5837:2012)

3. **Site and Surroundings**

- 3.1. The site occupies a prominent position at the junction with Hertford Road, Carterhatch Lane and Moorfield Road. The site comprises a two-storey rectangular building, set back from Hertford Road and Carterhatch Lane with a car park to the rear off Moorfield Road.
- 3.2. The existing site building is rectangular in form and utilitarian in appearance, with several recessed elements and a central lightwell.
- 3.3. The existing building is now vacant, having previously been occupied by the Barnet, Enfield and Haringey Mental Health Trust, a local authority children services team

and a GP Practice, all likely within Use Class E(e) - Commercial, Business and Service. The site has recently been sold by the NHS as surplus to requirements.

- 3.4. The site building is largely obscured from public view, given its siting set back from the road and the presence of trees, several of which are the subject of tree preservation orders (TPO), and vegetation located on boundary, particularly along Hertford Road and Carterhatch Lane. Vehicular access to the site is via Moorfield Road, whilst pedestrian access is primarily via Carterhatch Lane.
- 3.5. The site is poorly connected in terms of public transport and has a Public Transport Accessibility Level (PTAL) rating of 2 (poor).
- 3.6. The building is located within a busy mixed-use area, north-west of the Enfield Local Highway Local Centre, on Hertford Road (A1010). This is a main thoroughfare running north to south, where local centres and concentrations of activity, including a range of social and community uses such as schools, GP surgeries, open space and small parades of shops are located surrounded by built up neighbourhoods.
- 3.7. To the north of the site are the neighbouring properties of Nos. 4 -16 Moorfield Road, a two storey row of dwellings, the rear elevations and gardens of which, face onto and are contiguous with the full extent of the site.
- 3.8. To the east of the site is Hertford Road, beyond which are Nos. 233 - 249 Hertford Road (set to the north of Carterhatch Lane) and 253 - 273 Hertford Road (set to the south of Carterhatch Lane), a variety of building typologies from single to four storeys in height, primarily consisting of commercial activities at ground floor level with residential activities at upper floor levels, except No.241 Hertford Road, a purpose built residential block on the corner with Cedar Avenue.
- 3.9. To the south of the site is Carterhatch Lane, beyond which is No.43 – 45 Carterhatch Lane, one of several four to five storey purpose built residential blocks, along with a greened apex, consisting of several trees, at the junction with Hertford Road Carterhatch Lane.
- 3.10. To the west of the site is Moorfield Road, beyond which is No.1 – 43 Moorfield Road, one of several four to five storey purpose built residential blocks. The site is neither

located in or adjacent to a conservation area. The site is neither statutorily nor locally listed.

3.11. The following policy designations / characteristics apply to the site/adjacent to the site:

- Southbury Ward
- Flood Defence 100 year - 1000m
- North East Enfield Area Action Plan
- Tree Preservation Order (TPO) (ref:403/2018): There are five trees sited along the boundary with Moorfield Road and Hertford Road.
- Enfield Highway Local Centre

4. **Proposal**

4.1. The proposal seeks the following:

- The demolition of existing two storey centre for the provision of medical and/or health services (1300sqm).
- The redevelopment of the site to form a 9-storey residential block (height 33m) consisting of 106 flats in the following arrangement:
 - 41 x 1 Bedroom 2 Person (of which 6 would be WC)
 - 16 x 2 Bedroom 3 Person
 - 35 x 2 Bedroom 4 Person (of which 6 would be WC)
 - 14 x 3 Bedroom 5 Person

4.2. The redevelopment would include:

- 106 flats which would be 100% Affordable Housing at London Affordable rents
- 9,587sqm of residential floorspace (GIA)
- 77sqm for the internal refuse facility at ground floor level (20 x 1100 litre Eurobins)
- 155 sqm for the internal plant/servicing facilities at ground floor level
- 142 sqm for the internal cycle parking facilities at ground floor level (192 cycle spaces)
- 5 external Sheffield stands to the east of the site (10 cycle spaces)

- 2 car parking areas to the west of the site, accessed via Moorfield Road provide space for 9 vehicles.
- The north and south roof rooftop (7th floor level) would provide 2 x separate communal amenity spaces of 565sqm
- Private amenity space of 749sqm is proposed across the scheme
- The main roof (9th floor level) building would be include a green 'sedum carpet' roofed with Photovoltaics (PVs) and plant.
- Access to the building would be via two entrances (north and south) on the east facing elevation, each set within canopies.

4.3. The detailed scheme includes:

- The 9-storey building follows a mansion block design approach that is 'H' shaped in plan, with the long elevations fronting Hertford Road and Moorfield Road. The building would be clad in light brickwork up to 6th floor level, whilst the top two floors would be recessed from each elevation and clad in a pale Corium tile. The fenestration and projecting balconies would consist of dark Granite Grey aluminium, with light surrounds and copings of Glassfibre Reinforced Concrete (GRC).
- The site contains 23 trees in total (five of which are covered by a TPO (T1, T3, T14, T15 and T20 - as referenced in the Arboriculture Report). The proposal would require the removal of 16 trees (including one grouping), with 7 trees requiring pruning, reducing and lifting crowns of trees including all trees covered by a TPO.

Post Submission Changes

4.4 The initially submitted scheme, validated on 24.09.2020, described the following works:

- The demolition of existing two storey centre for the provision of medical and/or health services (GIA)
- The redevelopment of the site to form a 9-storey residential block consisting of 101 flats (Build-to-Rent (BtR) scheme) in the following arrangement:
 - 38 x 1 Bedroom
 - 51 x 2 Bedroom
 - 14 x 3 Bedroom

- The ground floor level would contain commercial uses in the following arrangement:
 - 153.5sqm (GIA) of Commercial Use Class E - Commercial, Business and Service
 - 128.5sqm (GIA) of Community Use Class F - Local Community and Learning

4.5 The redevelopment included:

- 50% Affordable Housing via 'fast track' – 50% Private
- 9,312 sqm (GIA) of residential floorspace
- 155sqm for the internal refuse facility at ground floor level
- 172 sqm for the internal plant/servicing facilities at ground floor level
- 155 sqm for the internal cycle parking facilities at ground floor level
- Sheffield stands to the east of the site
- 2 car parking areas to the west of the site, accessed via Moorfield Road provide space for 10 vehicles
- The north and south roof rooftop (7th floor level) would provide two separate communal amenity spaces
- Private amenity space for each unit
- The main roof (9th floor level) building would be include a green 'sedum carpet' roofed with Photovoltaics (PVs) and plant.
- Residential access to the building would be via a central entrance on the east facing elevation, each set within canopies
- Commercial access to the building would on the east and south facing elevations

4.6 At the request of the applicant, the offer of 50% affordable housing was withdrawn soon after validation of the application. As a result, an independent Financial Viability Assessment by BNP Paribas was undertaken on a 0% affordable housing contribution. The scheme however continued to be a Build-to-Rent (BtR) scheme.

4.7 At the request of the applicant, a revised scheme was formally submitted on 04.07.2021 for which this assessment relates. In summary, the changes include:

- Omission of commercial uses at ground floor
- Omission of Build-to-Rent (BtR) scheme
- Increase in total number of units from 101 to 106

- 100% Affordable Housing offer
- Central building form moved west
- Amend ground floor entrances, plant, refuse and cycling spaces
- Increase number of units with dual aspect

5. **Relevant Planning History**

- 5.1 TP/03/0128 - Demolition of existing Health Centre and construction of Primary Care Resource Centre (Outline Application.) Granted with Conditions on 20.06.2003.
- 5.2 TP/94/0911 - Alterations to ground floor envisaging infilling existing open ground floor space, to provide additional health centre facilities. Granted with Conditions on 20.12.1994.

Pre-submission applicant-led engagement

- 5.3 The current scheme stems from several previous Pre-applications, including meetings and workshops with Council officers, independent design review by Enfield Design Review Panel and presentation to the Greater London Authority.
- 5.4 18/03534/PREAPP - Demolition of existing two storey building and single storey outbuilding and the erection of part 2, part 4, part 6 storey building comprising 51 market residential units (16x1 bed, 21x2 bed and 14x3bed) with 39 parking spaces, communal amenity space, bike storey and refuse.
- 5.5 Council's conclusion (Summary):

At this stage, there is an in-principle concern given the loss of existing health facility in an area of identified need. Further information and justification are required to satisfy either part a. or part b of Policy DMD17 in particular.

Subject to justification regarding the loss of the D1 use (either through alternative provision elsewhere or market demand analysis), it is considered a residential led scheme is considered acceptable. As raised, consideration should be given to active uses at ground floor to assist in terms of public realm and enhancement of a local centre.

The proposal should adequately address Moorfield Road and consideration given. The inclusion of a mews or podium parking may assist in better addressing and reinforcing the built form to this street. Further details would also be required in relation to the elevation treatment (materials, window, balconies) although the principle of four storeys and 6 storeys are considered acceptable.

The quality of accommodation is of concern at this stage given the number of single aspect units and the lack of private amenity space and proximity of parking to ground floor units.

Considering the above comments it is recommend the applicant significantly re-appraise the scheme.

5.6 19/02891/PREAPP - Demolition of existing two storey building and single storey outbuilding for the erection of part 2, part 4, part 6 storey building of 56 residential units (41% Affordable) (18x1 bed, 21x2 bed and 17x3bed). Date opened 13.08.2019

5.7 Council's conclusion (Summary):

Evidence is required to demonstrate the provision elsewhere of services (GP and all services to have taken place on site eg Mental Health) satisfactorily meets the needs of the existing and future needs of the community (population/likely demographic shifts etc) and future plans or programmes of provision of public sector bodies. Evidence is required to demonstrate through a marketing exercise, an alternative D1 provider can be found. An acknowledged demand in the borough (GP services or any other similar health care facility), should be incorporated within this scheme.

As per the meeting and previous pre-app, an account should be provided as to the alternative layouts explored, eg. mews, or podium parking with maisonettes wrapping at ground and first floor (to ensure dual aspect). An active frontage along the east facing ground floor elevation is to be encouraged, be it retail/office/healthcare uses.

The open space which it faces could easily become undefined and may become underused and be perceived as unsafe. Active uses could assist in enlivening the street and space, whilst enhancing the role and function of the Enfield Highway Local Centre which we would welcome.

The necessity to get an RP on board is vital and should be incorporated at this stage to ensure a suitable offer for a guaranteed end user. This is vital to ensure a viable scheme. Offers of interest should be sought at this stage.

The TPO trees are a noted constraint and have informed the layout and form of the proposed buildings. As a result of the arrangement of the units however, some single aspect units (and units generally) would be screened by said trees, thereby significantly reducing their quality of accommodation.

The limited defensible space at ground floor level is a concern. Increased defensible measures or boundary treatment might harm the open and enlivened aspirations for the eastern elevation space. The outlook of the units at ground floor level is considered poor and this space lends itself far better to commercial uses. Thought should be given to active uses at the ground floor to give a degree of activity to these semi-private spaces.

Single aspect units should be replaced with dual aspect accommodation

The number of car parking spaces proposed has been reduced (based on the previous scheme) to just 27 spaces. This is a concern for us, as based on the previously agreed calculation of 0.5 spaces per 1 or 2 bed flat and 1.5 spaces for the larger 3-bed units, our calculations are that 45 car parking spaces that should be provided, which is well within the emerging London Plan standard for a development in outer London with a PTAL of 2, of a maximum of 1 space per dwelling.

As the number of car parking spaces is key to the acceptability of this scheme, and an increase in car parking numbers would clearly need a significant redesign of the scheme, we would need to resolve this issue at the earliest stage.

The cycle parking is now proposed in both the private and social housing cores; please ensure that the split of the facilities reflects the number of flats accessed from each core, and please note that these must be accessible from the main entrances

of the site, and not just from the rear car parking area, as they must be conveniently located to encourage use. Please also clarify the position of the proposed visitor cycle parking – this must be suitably located so that it is overlooked and therefore both accessible and secure.

The developers must submit a site specific FRA to ensure that the development is safe from flooding and will not increase flood risk elsewhere

Please note that a number of ‘principle’ matters such as land use and affordable housing require resolution and the above advice does not indicate the scheme as presented is acceptable. The above is an offer to continue dialogue with the understanding these key matters be overcome by the applicant prior to submission of a full planning application.

5.8 20/00620/PREAPP - Proposed redevelopment of site and erection of 100 residential units with community space (3 x options).

5.9 Enfield Place and Design Quality Panel’s conclusion (Summary):

- The panel appreciates early engagement with the design team and client on this key project. At this stage there are many ways the project can evolve and the panel offers several options for consideration.*
- The scheme is too tall in relation to its surroundings. Apart from the nearby high-rise block (which itself is at an inappropriate height) the proposed building would be substantially higher than its surroundings.*
- Moving to a “mansion block” approach rather than a single tall building is welcomed.*
- The internal layout of the building is compromised in part by only having one core, which creates long, dark internal corridors serving a significant number of flats, resulting in poor quality internal circulation space.*
- Additionally, there is a high number of single aspect units which, by virtue of the difficulty of achieving cross-ventilation, provide a poor quality of accommodation for residents.*
- The rooftops provide almost all the communal amenity space; but are exposed to sun and wind and are difficult to access from parts of the scheme. Consequently, there is a danger both that they could be underutilised, and the residents lack*

adequate recreational facilities. There may be an opportunity for further external communal amenity space on the ground floor (perhaps on the site of the car parking) and this should be investigated.

- *The retention of the trees on the Hertford Road boundary is welcomed as it enables the continuation of the existing north south green link. along the west side of the road.*
- *Overall, the scheme is struggling to optimise the site. It is overdeveloped to the detriment of the design. The panel encourage the design team to review the viability of different numbers of units and flat mix to explore ways to deliver a contextual but ambitious and good quality scheme. One option might be to re-examine the space proposed for commercial and community space on the ground floor; although the desirability of crating active frontage on this important corner is recognised.*

5.10 20/01797/PREAPP - The demolition of existing two storey health centre; Redevelopment of the site to form a 10 storey and 7 storey residential block consisting of 103 flats (33 x 1 Bedroom 2 person, 56 x 2 Bedroom and 14 x 3 Bedroom 5 person). Date opened 10.06.2020. The development would include:

- 9,219sqm of residential floorspace
- 144sqm of 'community' floorspace at ground floor level
- 161sqm of 'commercial' floorspace at ground floor level
- 240sqm of communal amenity space at upper floor level
- 9 car parking spaces to the west of the site
- 177 cycle parking spaces (short term - external, long term - internal) located at ground floor level
- A refuse facility located within the building at ground floor level

5.11 Council's conclusion (Summary):

The principle of the demolition of all buildings on site for their replacement could be acceptable, however several key matters remain outstanding and the LPA would not therefore be in a position to offer support for the scheme as it stands.

Significant engagement by the applicant with the LPA is required at this stage prior to a formal application being submitted; where the following key matters remain an impediment to receiving LPA support:

- *The lack of a replacement community facility – a communal/commercial space as part of a shared living experience would not fulfil this requirement.*
- *The proposed height of the buildings at 10 and 7 storeys, rather than 6 storeys*
- *The limited offer of dual aspect accommodation (LPA to agree classification)*
- *The limited outlook for accommodation in proximity to retained trees.*
- *The functionality of the rooftop amenity space*
- *The absence of an implemented CPZ (and cycling improvements) to ensure an agreed car free scheme.*
- *The pruning pressure on TPOs near the proposed building for good quality accommodation.*

5.12 Greater London Authority conclusion (Summary):

The site was formerly in use as a healthcare facility. The supporting text for Intend to Publish London Plan Policy S1 sets out that social infrastructure covers a range of facilities that meet local and strategic needs and contribute towards a good quality of life, including healthcare provision, and that redundant social infrastructure should be considered for full or partial use as other forms of social infrastructure before alternative developments are considered. This policy also states that where social infrastructure providers are undertaking an agreed service re-provision or reconfiguration, losses from redundant sites may be acceptable. The applicant should provide background on why NHS services have vacated this site and seek verification from the Council that the site is not required to meet any alternative local social infrastructure need.

The applicant is proposing a 10-storey building, which could reasonably be considered a tall building given the predominantly low-rise context. Intend to Publish London Plan Policy D9 indicates that the location of tall buildings should be plan-led, placing the onus on LPAs to identify appropriate locations for tall buildings in Development Plans. In this instance, the Enfield Local Plan does not give specific guidance on suitable locations for tall buildings within the borough; therefore, the proposal must be evaluated on its own merits. This is discussed further in the Urban Design section below.

The applicant is advised that Build to Rent schemes must be held as such under a covenant for at least 15 years, with affordable provision secured in perpetuity, and a

clawback mechanism in place within the S106 to ensure that there is no financial incentive to break the covenant. The units must furthermore be self-contained, let separately, and benefit from on-site management.

Fast Track schemes are not required to submit viability information for scrutiny by GLA officers. In this instance the 50% public land threshold applies. To follow the Fast Track Route, Build to Rent schemes must provide the threshold level of Discount Market Rent (DMR) homes with at least 30% of the first 35% provided at London Living Rent (LLR) levels. The remainder should be provided at a range of genuinely affordable discounts below market rent based on local need to be agreed upon with the Council and the Mayor.

The applicant should engage with the local authority to ensure that the proposed unit size mix responds to local need

Following several revisions based on feedback from the LPA and Design Review Panel the proposal comprises a 10-storey element towards the south of the site and a 7-storey element to the north. The proposed height strategy introduces height and density along the busier Hertford Road and Carterhatch Lane. This facilitates the optimisation of this brownfield Opportunity Area site and helps to moderate the difference between the low-rise surrounding context and the existing 13-storey residential tower southwest of the site. Accordingly, the proposed scale and massing is supported in principle, subject to addressing the associated issues discussed in this report, as well as the assessment criteria within London Plan Policy 7.7 and Intend to Publish London Plan Policy D9.

As discussed at the meeting, there is some concern that the 10-storey block may overshadow the west-facing lower level units, potentially compromising the residential quality of units that would already have a relatively poor outlook over the servicing entrance and car parking provision. However, it is understood that the applicant is working to refine the design to address these issues. The applicant should continue to test and develop designs based on the emerging lighting studies to address any problematic results and ensure optimal natural light into the scheme's units and surrounding properties).

The addition of a second core is supported, as it creates better internal layouts, improves the interior circulation spaces, and reduces the provision of single aspect units.

The applicant has indicated that the TPO trees will be retained, which is positive. The applicant should also consider retaining or planting additional trees along the northern boundary to enhance the view from and buffer between the proposed development and the residential properties to the north. Additionally, the proposed car park and public realm would benefit from further refinement in terms of layout, landscaping and design.

The proposals improve the existing boundary treatment to the south making the site much more accessible and presenting active frontages onto Carterhatch Lane and Hertford Road. The open and ground level access to community facilities here is supported

The applicant must ensure that the provision of single aspect units has been minimised, and that all such units will have adequate passive ventilation, daylight and privacy, and avoid overheating. The proposed residential layout is developing to a high standard, achieving a high percentage of dual aspect units and efficiently designed cores. The proposed central entrance offers east-west permeability and visibility through the lobby. This is supported. As mentioned above, the applicant is exploring design solutions to improve the residential quality in lower level units on the west side of the building. This is strongly encouraged.

The roof terrace design is developing positively with appropriate detailing, such as high parapets to accommodate safe play. Further assessments such as wind testing and investigation into appropriate substrate depth are required to ensure that the proposed landscaping can be delivered. It may be useful to revise views of the building as this design progresses, including how the roof and building will look from surrounding neighbourhoods and the local high street with heritage assets.

The design concept and emerging materials look positive with high quality brick illustrated in the visuals. The applicant is encouraged to continue collaborating with the LPA on the materials and details to ensure the development complements the local character and heritage. As much detail as possible should be captured in the planning submission to ensure that a high-quality overall appearance is achieved.

The proposed development is car-free except for ten disabled spaces, which equates to 10% of the total number of residential units and is strongly supported. All of these spaces should be equipped with electric vehicle charge points to meet Intend to Publish London Plan standards and measures preventing overspill car parking from the development onto adjacent streets, such as a Controlled Parking Zone, should be secured by planning condition and S106 as appropriate.

The applicant's commitment to provide a policy compliant quantum of cycle parking is welcomed and based on materials provided a minimum of 173 long stay and 4 short stay cycle parking spaces should be provided. Cycle parking facilities should be designed in accordance with London Cycling Design Standards (LCDS) with each cycle storage area comprising no more than 100 spaces, 5% of spaces designed to accommodate larger cycles such as cargo or adapted bikes (at minimum), and visitor cycle parking provided at surface level or on-street. Additionally, cycle parking access should be welcoming to people of all abilities, enabling and encouraging all people to cycle.

The optimisation this brownfield site by way of a residential-led mixed-use development including a 50% affordable housing offer is strongly supported in principle, subject to confirmation from the Council that the site is no longer required for social infrastructure use. Any future application should address matters raised in the urban design, housing and transport sections of this report. Sustainable development matters were not discussed at the meeting. Any future application is expected to comply with the policies and guidance referenced in the sustainable development section of this report and the applicant is encouraged to submit a draft energy strategy for comment by GLA officers.

6 Public Consultation

- 6.1 In December 2020, the Council adopted a Statement of Community Involvement (SCI), which sets out policy for involving the community in the preparation, alteration and review of planning policy documents and in deciding planning applications.

- 6.2 Initial consultation on the application involved notification letters being sent to 692 neighbouring properties on 19.10.2020 (giving people 28-days to respond), a site notice was placed on site on 07.10.2020 (giving people 28-days to respond) and a press advert in the Enfield Independent on 14.10.2020 (giving people 14 days to respond).
- 6.3 Following receipt of revisions and supplementary information, all information was published on the Council's website on 04.07.2021.
- 6.4 In respect of the initially submitted scheme, 7 representations were received from neighbours (Moorfield Road, Cedar Avenue, Lytchet Way and Old Road) in response to notification and publicity of the application regarding:
- 6.5 Objections Table: Summary of Reasons for Comment:

Close to adjoining properties	2
Development too high	6
General dislike of proposal	3
Inadequate parking provision	7
Increase in traffic	4
Increase of pollution	2
Loss of light	4
Loss of parking	7
Loss of privacy	2
Noise nuisance	3
Over development	3
Strain on existing community facilities	5
Inadequate public transport provisions	2
Out of keeping with character of area	2
Close to adjoining properties	1
Affect local ecology	1
Conflict with local plan	1

6.6 In respect of the revised scheme, no representations have been received from neighbours in response to the publicity of the application. Any comment subsequently received shall be reported at committee.

7 Internal Consultation

7.1 A summary of internal consultation responses these have been summarised in the table below.

Internal consultation responses	
Consultee	Comments
Section 106	No comment
Education	No comment
Economic Development	No comment
Transportation	No objection, subject to conditions and contributions
Housing Renewal	The Council as a Strategic Housing Authority supports this application as it secures the delivery of 100% affordable housing.
Regeneration, Leisure And Culture	No objection
SUDs highways	No objection subject to conditions requiring Sustainable Drainage Strategy (pre-commencement other than for Enabling Works) and Verification Report.
SUDs	Objection raised
Health	No comments
Commercial waste services	No comments
Environmental Health Team	No objection raised subject to conditions.
HASC	No comments

Planning Policy	The proposal is acceptable in principle, however, more family sized units are required and the loss of non-residential use at the site has not been adequately justified.
Heritage And Design Team	No comments
Urban Design Team	Objection raised
Trees	Objection raised – see section # of this report.
Highways Team	No objection subject to legal agreement
Environmental Health	Environmental Health does not object subject to conditions.
Waste Management	No comment.
Energetik	Discussions are ongoing between the applicant and the Council's District Heat Network (DHN) setup company 'Energetik' with the intention of confirming that the development will link up to the network (noting that the development has been designed to be able to do so). Should a connection to the DHN prove unfeasible and/or unviable the applicants will move to their reserve strategy (as outlined in the planning application) which assumes an Air Source Heat Pump based solution.

8. Statutory and Non-Statutory Consultees

- 8.1 The consultation responses have directed and facilitated the changes to the development. If the proposed development was acceptable in all other respects a condition would have been attached to secure policy compliant development. A summary of statutory and non-statutory consultation responses are outlined in the table below:

Consultee	Comments
Metropolitan Police Service Designing Out Crime Service	No objection – subject to conditions

London Fire & Emergency Planning	Any comment received will be reported at the meeting
Thames Water	<p>Raised no objection</p> <ul style="list-style-type: none"> - Waste Comments <p>Thames Water would advise that with regard to SURFACE WATER network infrastructure capacity, we would not have any objection to the above planning application, based on the information provided.</p> <p>Thames Water would advise that with regard to FOUL WATER sewerage network infrastructure capacity, we would not have any objection to the above planning application, based on the information provided.</p> <p>There are public sewers crossing or close to your development. If you're planning significant work near our sewers, it's important that you minimize the risk of damage. We'll need to check that your development doesn't limit repair or maintenance activities, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes.</p> <p>Thames Water would recommend that petrol / oil interceptors be fitted in all car parking/washing/repair facilities. Failure to enforce the effective use of petrol / oil interceptors could result in oil-polluted discharges entering local watercourses.</p> <p>Water Comments</p> <ul style="list-style-type: none"> - There are water mains crossing or close to your development. Thames Water do NOT permit the building over or construction within 3m of water mains. If you're

planning significant works near our mains (within 3m) we'll need to check that your development doesn't reduce capacity, limit repair or maintenance activities during and after construction, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes.

<https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes>

If you are planning on using mains water for construction purposes, it's important you let Thames Water know before you start using it, to avoid potential fines for improper usage. More information and how to apply can be found online at thameswater.co.uk/buildingwater.

On the basis of information provided, Thames Water would advise that with regard to water network and water treatment infrastructure capacity, we would not have any objection to the above planning application. Thames Water recommends the following informative be attached to this planning permission. Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.

The applicant is advised that their development boundary falls within a Source Protection Zone for groundwater abstraction. These zones may be at particular risk from polluting activities on or below the land surface. To prevent pollution, the Environment Agency and Thames Water (or other local water undertaker) will use a tiered, risk-based approach to regulate activities that may impact groundwater resources. The applicant is encouraged to

	<p>read the Environment Agency’s approach to groundwater protection (available at https://www.gov.uk/government/publications/groundwater-protection-position-statements) and may wish to discuss the implication for their development with a suitably qualified environmental consultant.</p>
<p>Greater London Authority</p>	<p>The loss of the existing use is acceptable in strategic planning terms. However, there are matters that need to be addressed to ensure full compliance with the London Plan and the Mayor’s Intend to Publish London Plan.</p>
<p>Transport for London</p>	<p>The following matters should be resolved before the application can be considered in line with the transport policies of the Intend to Publish London Plan;</p> <ol style="list-style-type: none"> 1. Undertake Stage 1 Road Safety Audit for all highway proposal; 2. Undertake further work on the ATZ assessment in light of comments; and secure appropriate financial contribution toward local pedestrian, cycle and public realm improvements; 3. Secure the provision of cycle parking and approval of details by condition; 4. Secure the provision of all car parking (including ECVP) and Car Parking Management Plan; 5. Secure legal restrictions to exempt future residents’ eligibility for local parking permits and expand CPZ if needed; 6. Remove the proposed car club space from the proposal; 7. Provide justification for not providing off-street service; 8. Secure the DSP and CLP by conditions;

	<p>9. Improve the Travel Plan ensuring it contribute positively toward the Mayor’s sustainable travel goal and secure them by s106 agreement; and</p> <p>Secure appropriate Mayor CIL payment from the proposal toward Crossrail.</p>
<p>Enfield Disablement Association</p>	<p>No comments</p>

9. Relevant Planning Policies

9.1. Section 70(2) of the Town and Country Planning Act 1990 requires the Committee have regard to the provisions of the development of the development plan so far as material to the application; and any other material considerations. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning decisions to be made in accordance with the development plan unless material considerations indicate otherwise.

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

The London Plan 2021

9.3. The London Plan was adopted in March 2021 and sets out a s spatial strategy that plans for London’s growth in a sustainable way through to 2041. The scheme has been assessed against the policies of this Plan.

9.4. The following London Plan policies are considered particularly relevant:

- GG1 Building strong and inclusive communities
- GG2 Making the best use of land
- GG3 Creating a Healthy City
- 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
- D11 Safety, Security and Resilience to Emergency
- D12 Fire safety
- D13 Agent of Change
- D14 Noise
- H1 Increasing housing supply
- H4 Delivering Affordable Housing
- H6 Affordable housing tenure
- H10 Housing size mix
- G1 Green Infrastructure
- G5 Urban greening
- G6 Biodiversity and access to nature
- G7 Trees and woodlands
- S4 Play and Informal Recreation
- SI 1 Improving air quality
- SI 2 Minimising greenhouse gas emissions
- SI3 Energy Infrastructure
- SI4 Managing heat risk
- SI5 Water infrastructure
- SI6 Digital Connectivity Infrastructure
- SI7 Reducing Waste and Supporting the Circular Economy
- SI 8 Waste capacity and net waste self-sufficiency
- SI12 Flood Risk Management
- SI13 Sustainable Drainage
- T1 Strategic Approach to Transport
- T2 Healthy Streets
- T3 Transport Capacity, Connectivity and Safeguarding
- T4 Assessing and Mitigating Transport Impacts
- T5 Cycling
- T6 Car Parking

- T6.1 Residential parking
- T7 Deliveries, servicing and construction
- T9 Funding Transport Infrastructure Through Planning
- DF1 Delivery of the Plan and Planning Obligations

Local Plan – Overview

- 9.5. Enfield's Local Plan comprises the Core Strategy, Development Management Document, Policies Map and various Area Action Plans as well as other supporting policy documents. Together with the London Plan, it forms the statutory development policies for the borough and sets out planning policies to steer development according to the level it aligns with the NPPF. Whilst many of the policies do align with the NPPF (2021) and London Plan (2021), it is noted that these documents do in places supersede the Local Plan in terms of some detail and as such the proposal is reviewed against the most relevant and up-to-date policies within the Development Plan.

Local Plan – Core Strategy

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

- 9.7. The following local plan Core Strategy policies are considered particularly relevant:

- CP 2 Housing Supply and Locations for New Homes
- CP 3 Affordable Housing
- CP 4 Housing Quality
- CP 5 Housing Types
- CP 9 Supporting Community Cohesion
- CP 17 Town Centres
- CP 20 Sustainable Energy Use and Energy Infrastructure
- CP 21 Delivering Sustainable Water Supply, Drainage Sewerage Infrastructure
- CP 24 The Road Network

- CP 25 Pedestrians and Cyclists
- CP 26 Public Transport
- CP 28 Managing Flood Risk Through Development
- CP 29 Flood Management Infrastructure
- CP 30 Maintaining and Improving the Quality of the Built and Open Environment
- CP 32 Pollution
- CP 34 Parks, Playing Fields and Other Open Spaces
- CP 36 Biodiversity

Local Plan - Development Management Document

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

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

- DMD 1 Affordable Housing on Sites Capable of Providing 10 units+
- DMD 3 Providing a Mix of Different Sized Homes
- DMD 6 Residential Character
- DMD 8 General Standards for New Residential Development
- DMD 9 Amenity Space
- DMD10 Distancing
- DMD 28 Large Local Centres, Small Local Centres and Local Parades
- DMD 37 Achieving High Quality and Design-Led Development
- DMD 38 Design Process
- DMD 43 Tall Buildings
- DMD 45 Parking Standards and Layout
- DMD 47 New Road, Access and Servicing
- DMD 48 Transport Assessments
- DMD 49 Sustainable Design and Construction Statements
- DMD 50 Environmental Assessments Method
- DMD 51 Energy Efficiency Standards
- DMD 52 Decentralized Energy Networks

- DMD 53 Low and Zero Carbon Technology
- DMD 54 Allowable Solutions
- DMD 55 Use of Roof Space / Vertical Surfaces
- DMD 56 Heating and Cooling
- DMD 57 Responsible Sourcing of Materials, Waste Minimisation
- DMD 58: Water Efficiency
- DMD 59: Avoiding and Reducing Flood Risk
- DMD 60: Assessing Flood Risk
- DMD 61: Managing surface water
- DMD 62: Flood Control and Mitigation Measures
- DMD 64: Pollution Control and Assessment
- DMD 65: Air Quality
- DMD 66: Land Contamination and instability
- DMD 68: Noise
- DMD 69: Light Pollution
- DMD 70: Water Quality
- DMD 71: Protection and Enhancement of Open Space
- DMD 72: Open Space Provision
- DMD 73: Child Play Space
- DMD 77: Green Chains
- DMD 79: Ecological Enhancements
- DMD 80: Trees on Development Sites
- DMD 81: Landscaping

Enfield Draft New Local Plan

- 9.10 The Council consulted on Enfield Towards a New Local Plan 2036 “Issues and Options” (Regulation 18) (December 2018) in 2018/19.
- 9.11 A second Regulation 18 ‘Main Issues and Preferred Approaches’ document was approved for consultation on 9 June 2021. Public consultation concluded on 13 September 2021. This document identifies a preferred level of growth and sets out a preferred spatial strategy and related policies for accommodating growth. However, given the stage in the process, the Regulation 18 documents are considered to have very little weight in determining planning applications.

National Planning Policy Framework (July 2021)

9.12 The National Planning Policy Framework (NPPF) introduces a presumption in favour of sustainable development. Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives. A 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 well-designed, beautiful and safe places, 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 protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

9.13 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.

9.14 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.

9.15 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.

Presumption in Favour of Sustainable Development

9.16 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 (7), 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 (6); or

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.

9.17 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.”

- 9.18 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.
- 9.19 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.
- 9.20 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.
- 9.21 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.
- 9.22 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.

National Planning Practice Guidance (NPPG)

- 9.23 The Government published NPPG sets out further detailed guidance on the application of policies set out in the NPPF. NPPG guidance covers matters such as decision making, planning conditions and obligations, EIA, the historic and natural environment and design.

Other Material Considerations and guidance

9.24 The following guidance is also considered particularly relevant:

- North East Area Action Plan
- 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)
- Report of the Examination in Public of the London Plan (2019)
- National Design Guide (2019)

10. Assessment

10.1 The main planning issues to consider are as follows:

- Principle of development

- Land use
- Character, Design, Scale and Height Considerations
- Affordable housing
- Housing need mix and delivery
- Standard of accommodation
- Residential amenity
- Accessibility

- Neighbouring Amenity Considerations
- Transportation, parking and highways
- Waste storage
- Trees and Landscaping
- Flood risk and drainage
- Environmental considerations
- Education
- Sustainable design and construction
- Security
- Fire Safety
- Equalities duty and human rights
- CIL

11. Principle of Development

11.1. The NPPF and London Plan advise that local authorities should seek to deliver a wide choice of high-quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities.

11.2. The Borough's current target for the plan period is for a minimum of 12,460 net housing completions between 2019/20 – 2028/29, as set out in the London Plan 2021. In the event that the proposed development was acceptable in all other respects, the proposed 106 new dwellings would make a positive contribution towards meeting the strategic housing needs of Greater London and increasing the housing stock of the Borough in accordance with the National Planning Policy Framework (NPPF) and the Policy CP5 of the Enfield Core Strategy (2010). In this context, it is acknowledged the redevelopment of the site could help delivery and contribute to the Council's substantial housing delivery targets which is welcome.

11.3. It is also recognised that the Council has failed the most recent Housing Delivery Test and is therefore, residential development is subject to the presumption in favour of sustainable development. The tilted balance therefore has to be applied in assessing and weighing up the benefits of the scheme and whether on balance the impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in [the NPPF] taken as a whole.

12. *Land Use:*

12.1. Policy S1D of the London Plan indicates that “*Development proposals that seek to make best use of land, including the public-sector estate, should be encouraged and supported. This includes the co-location of different forms of social infrastructure and the rationalisation or sharing of facilities.*” The proposal and the evidence submitted appears to meet the aims of making best use of land.

12.2. Policies (DMD17) seek to resist the loss of existing social infrastructure while DMD17 sets out the approach to protection of community facilities. Taking each part of DMD17 in turn, part (a) indicates that proposals involving the loss of community facilities will not be permitted unless “a suitable replacement facility is provided to cater for the local community that maintains the *same level of public provision and accessibility*”.

12.3. The existing medical facility was closed in 2017 and the site sold for alternative development. This followed a decision by the local NHS on the future delivery of health care facilities in the Borough and the transfer of services to Riley House. However, while it is noted that the former practice boundary is not covered in its entirety by the practice boundary of the new facility at Riley House, given the wider evidence provided by the NHS with respect to the need for consolidation of buildings, the accessibility of the alternate facility to the local community and the surgery at Brick Lane having spare capacity for c. 1,200 additional patients, it is considered this alternative methodology is acceptable.

12.4. It is accepted the new facility appears to be served by the same bus links and officers are also satisfied that disabled car parking levels are as a minimum the same as provided at the former facility. Consequently, while there is a change in accessibility, and Part A of DMD17 is not fully met, with reference to housing need and the tilted

balance, it is considered this issue given the overall availability of health care services is not of sufficient concern to justify a ground for refusal.

12.5. Part B of DMD17 requires evidence to be submitted that demonstrates *“there is no demand for the existing use or any alternative community use”* if part A cannot be met. 3.1.1 sets out a range of alternative community facilities which could include:

- Recreation, leisure, culture and arts facilities, including theatres;
- Libraries; adequate justification
- Outdoor and indoor sports facilities;
- Schools and other educational and training institutions;
- Facilities for early years provision; -
- Health facilities;
- Day centres vulnerable adults and carers;
- Community halls and centres;
- Places of Worship;
- Emergency service and policing facilities, accessible to the public.

12.6. Part G of the London Plan also indicates that *“Redundant social infrastructure should be considered for full or partial use as other forms of social infrastructure before alternative developments are considered, unless this loss is part of a wider public service transformation plan (see Part F2).”*

12.7. The applicant suggests that the marketing through ePIMS to other public sector bodies demonstrates there is no demand for alternative community uses. However, some of the facilities listed above would not be exclusively provided by public sector landowners, (i.e. places of worship).

12.8. In this regard, the applicant has provided further evidence, in the form of a Social Infrastructure Needs Assessment which includes a letter from Allsop, to demonstrate it has been considered for use as other forms of social infrastructure. The alternative uses which have been considered are underlined above with comments on the assessment provided after each use. It should also be noted that the originally submitted scheme did include community space at ground floor but following negotiations as to review viability and maintain housing numbers, it was accepted that the ground floor community space could be removed from the scheme.

12.9. For the reasons considered above and applying weight to the fact that the health facility was relocated in 2017 and in the context of the Council's most recent Housing Delivery Test results on balance proposed development would be acceptable. The proposed development would therefore be acceptable when balanced against Policies DMD17 of the development management document 2016 and S1 of the London Plan 2021.

13. Character, Design, Scale and Height Considerations

13.1. According to Section 12 of the NPPF (2021) the Government attaches great importance to the design of the built environment, with good design being a key aspect of sustainable development. Paragraph 126 confirms that "The creation of high-quality buildings and places is fundamental to what the planning and development process should achieve" and that "Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities." Policy D3 of the London Plan (2021) expects "all development must make the best use of land by following a design-led approach that optimises the capacity of sites, including site allocations. Optimising site capacity means ensuring that development is of the most appropriate form and land use for the site. The design-led approach requires consideration of design options to determine the most appropriate form of development that responds to a site's context and capacity for growth, and existing and planned supporting infrastructure capacity".

13.2. Policy CP30 of the Core Strategy requires new development to be of a high-quality design and in keeping with the character of the surrounding area. This is echoed in Policy DMD8 which seeks to ensure that development is high quality, sustainable and has regard for and enhances local character.

Character and Townscape

13.3. The application site is rectangular in shape and located to the north of the Enfield Highway Local Centre. It is evident there is a variety of buildings in age, design and materiality within the vicinity of the site. It is bounded by Carterhatch Lane, Hertford Road and Moorfields Road. The site is located on a prominent corner of a busy junction. The trees around the perimeter largely obscure views into the site. The site

itself is covered by a large rectangular two storey building and single storey ancillary structure. Although large, it has a relatively low-key appearance within the townscape. The Site also has specific constraints, most notably in terms of tree Root Protection Areas. This site-specific constraint has influenced the form of the development.

- 13.4. The Enfield Characterisation Study identifies that the buildings in linear centres also lack the cohesiveness of the more mannered 'Metroland centres'. Enfield Highway Local Centre has elements which were built as part of interwar redevelopment. It is evident the centre features a variety of building types and periods. This gives considerable variety in scale, materials and details, within proximity to the application site.
- 13.5. The existing buildings on the site are also considered post war and of little architectural merit. These buildings are not designated heritage assets (neither being listed). There is no objection to their demolition and replacement, subject to appropriate design.
- 13.6. The site contains 23 trees in total (five of which are covered by a TPO (T1, T3, T14, T15 and T20 - as referenced in the Arboriculture Report). The proposal would require the removal of 16 trees (including one grouping), with 7 trees requiring pruning, reducing and lifting crowns of trees including all trees covered by a TPO.
- 13.7. The proposal would involve the redevelopment of the site involving the construction of 9-storey building. The building would follow a mansion block design approach that is 'C' shaped in plan, with the long elevations fronting Hertford Road and Moorfield Road. The building would be clad in light brickwork up to 7th floor level, whilst the top two floors would be recessed from each elevation and clad in a pale Corium tile. The fenestration and projecting balconies would consist of dark Granite Grey aluminium, with light surrounds and copings of Glass fibre Reinforced Concrete (GRC). There would be 2 x main residential entrances that front onto Hertford Road. The proposed through route to the lobby is welcome and the 2-core approach is also a welcome addition which allows for a lower number of homes per floor / core and a greater sense of security and ownership.
- 13.8. In terms of the wider site, the siting of the building has been adjusted to facilitate continuation of a green buffer along the road to minimise impact on the existing trees.

As a result, the building does not align with the existing street pattern and sits at an angle to the line of buildings along Hertford Road.

Tall Buildings (scale, height and massing)



13.9 The NPPF at Para 119 states Planning decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions, in a way that makes as much use as possible of previously-developed or 'brownfield' land. Para 124 of the NPPF also states that planning decisions should support development that makes efficient use of land, 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.

13.10. The London Plan advises that while high density does not need to imply high rise, tall buildings can form part of a plan-led approach to facilitating regeneration opportunities and managing necessary future growth, contributing to new homes and economic growth, particularly in order to make optimal use of the capacity of sites which are well-connected by public transport and have good access to services and amenities. Tall buildings can help people navigate through the city by providing reference points and emphasising the hierarchy of a place such as its main centres of activity, and important street junctions and transport interchanges. It is also considered that tall buildings that are of exemplary architectural quality and in the right place, can make a positive contribution to London's cityscape. Many tall buildings have become a valued part of London's identity. However, they can also have detrimental visual, functional and environmental impacts if in inappropriate locations and/or of poor quality design.

- 13.11. London Plan Policy D9 states that Boroughs should determine through their local plan if there are locations where tall buildings may be appropriate and proposals should take account of, and avoid harm to, the significance of London's heritage assets and their settings. Tall buildings should only be developed in locations that are identified as suitable in Development Plans. The current development plan for the Borough does not identify suitable locations for tall buildings pursuant to the requirements of London Plan Policy D9. It can be noted that the Council's draft Reg18 local plan does not identify this land as an appropriate location for tall buildings.
- 13.12. DMD 43 classifies a tall building as over 30m as does the London Plan. The proposed development would rise 9 storeys with a maximum height of 33m. DMD Policy 43 (Tall Buildings) is a criteria-based policy for considering tall buildings, which justifying text (para. 6.4.1) defines as those "that are substantially taller than their surroundings, cause a significant change to the skyline or are larger than the threshold sizes set for the referral of planning applications to the Mayor." It states that tall buildings will not be acceptable in areas classified as inappropriate unless it can be demonstrated how the proposal avoids the negative impacts associated with the sensitive classification.
- 13.13. Paragraph 130 of the NPPF states that "Planning policies and decisions should ensure that developments are, C) are sympathetic to local character and history, including the surrounding built environment and landscape setting...; and d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit.
- 13.14. Both the London Plan and DMD tall building policies are relevant to the proposed development. The policies can be distilled into two questions:
- i) is the proposal in the right location,
 - ii) is it of high quality?
- 13.15 Acceptability of a taller building in a particular location will be dependent on the detailed local context including the design of the building, the relationship to neighbouring properties, the relationship with any heritage assets and the impact on any views including those to and from historic buildings over a wide area. This requires careful consideration should be given to the potential negative impact that the introduction of a taller building might have. As always, it is necessary to assess

and evaluate the merits of individual proposals and exceptionally it may be possible for an applicant to demonstrate that an exemplary designed taller building is acceptable within or close to nationally or locally designated heritage assets.

13.15. In addition, recent caselaw indicates that notwithstanding the plan led approach of London Plan Policy D9, the land does not have had to be identified as appropriate for tall buildings as long as it is appropriate for its location in terms of its design.

13.16. While the site is not located in a town centre but of the edge of a local centre and has reasonable public transport accessibility, the location of a tall building has generated a range of views and from an urban design perspective and there are concerns about whether this location for a tall building is appropriate questioning the justification on the basis of townscape legibility and its role as a focal point for development at this junction. In this regard, the balance is whether the benefits of the proposal in terms of housing delivery and provision of affordable housing outweigh the visual concerns associated with the 9 storey height of the development as proposed and whether this would have a negative impact on the legibility of the locality, when experienced as part of the Borough's existing townscape.

13.17. It is acknowledged that predominantly, the surrounding context for height is 4 storeys. However, Hastings House does form part of the visual context for development on this site and has been put forward as a local precedent. It is certainly a significant feature in the local environment although it must be noted that the 2012 Report on Tall Buildings (which forms the evidence base for DMD policy) assesses this building as "Inappropriate Location, Inappropriate Building" (No. 30 Existing Tall building assessment map, pp 11.). Nevertheless, there are no proposals for replacement and thus its presence is a material consideration.

13.18. The proposed development is clearly a tall building within the context of adopted policy and would represent a significant addition to the built environment. It is acknowledged there are concerns about the suitability of this site to accommodate such a tall building and this needs to be weighed against the benefits in terms housing delivery and 100% London Affordable rent

13.19. Giving weight to the aforementioned benefits of the proposal and the presumption in favour and tilted balance, it is considered a height at 9 storey could be accepted on

part of the site in terms of its presence in the street scene. However, the resultant bulk and massing of this development particularly to its northern end results in unacceptable impacts to the residential amenities of neighbouring properties. This is discussed later in the report.

Articulation and Materiality

- 13.20. The quality of brickwork, balcony detailing windows and surrounding lintels appears to be of a high quality and carefully considered and work well with the surrounding context. In the event that the proposed development was acceptable in all other respects a condition would have been attached that requires materiality details to be submitted to the Council and approved in writing.

Conclusion of Character / Tall Building

- 13.21. Whilst there is a need for more housing in Enfield, development should be designed to optimise sites rather than maximise them. This proposal seems to be a case of maximisation rather than optimisation and overall, it is considered the proposals represent an overdevelopment of the site.
- 13.22. This proposal represents a significant development on a prominent corner site. It is acknowledged that the surrounding area has a variety of building styles and as a result, while Policies D9 (London Plan and DMD 43 are noted, taking account of the benefits associated with this proposal, in principle, a development involving height up to 9 storeys is on balance, considered acceptable and would not unduly harm the townscape character of the locality sufficient to outweigh the benefits of the proposal.

14. Siting, Trees and landscaping

- 14.1. Policy DMD 80 requires the retention and protection of trees of amenity and biodiversity value on a site and in adjacent sites that may be affected by proposals. Policy DMD 81 ensures development must provide high quality landscaping that enhances the local environment.
- 14.2. The submission indicates that all trees covered by a TPO will be retained and protected as a result of the development. However, concern remains as to the relationship such trees are to have with the resulting building and quality of

accommodation therein. The Council's tree officer is of the view that the spatial relationship that would exist between the proposed building and the trees on the eastern site boundary would for the most part be unsustainable. The visual impact upon the street scene of Hertford Road that would result from the loss of B category trees (T8 and T12) on the southern boundary at the junction Carterhatch Lane is also of great concern.

- 14.3. Trees to the east (T17 and T16 and T14) have growth potential and would be subject to constant pruning pressure (not only from construction by following occupation) in such proximity to the proposed building. The T14 (London plane), would restrict levels of daylight / morning sunlight to the lower floors, particularly in the summer months when it is in leaf and continues to grow. The tree has considerable future growth potential.
- 14.4. At present the footprint of the proposed development would encroach within the canopy of the T17 (ash) has not been amended from the former design; at present, the footprint encroaches within the canopy of this tree quite considerably, especially at the northern corner where there would be balconies. As with the adjacent trees T14 and T15, this tree also has considerable future growth potential. The arboricultural report states that the tree's western canopy spread would only need to be reduced by 3m to facilitate construction. However, the Council's Tree officer considers this to be a gross under-estimation/generalisation. It is estimated that the amount of the reduction required to be at least 4.5m directly to the west, as the western flank of the proposed building projects approximately 3.5m beyond the existing; this would increase to approximately 6.5m at the north eastern corner of the building where the balconies would be situated. In both orientations, 1m of additional pruning has been added to allow for scaffolding and clearance from the building post-construction.
- 14.5. Aside from the inappropriate, excessive pruning that would be necessary to accommodate the proposed building, repeated pruning would be necessary post-construction to maintain clearance from the building and balconies. Another case of foreseeable post-development pressure due to poor spatial relationship between trees and buildings. The trees future growth and likelihood of post-development pressure has not been considered within the arboricultural report.

- 14.6. Although not preserved the trees at the southern end of the site at the junction of Hertford Road and Carterhatch Lane do form a coherent group of high visual amenity, on account of their prominent location. The quality between them does vary, but there are certainly two that merit retention T8 (Norway maple) and T12 (ash) although they are not subject to a TPO
- 14.7. For the reasons considered above the proposal by reason of its impact upon the preserved trees and the loss of B category trees at southern end of the application site would harm the visual amenity of the area and not comply with the policies outlined above.
15. Housing Need & Delivery
- 15.1 The current London Plan sets a target for the provision of 52,287 new homes across London each year with Enfield identified as contributing 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. Notwithstanding, only 51% of approvals in the Borough have been delivered over the previous 3-years meaning that unit approvals must exceed this figure considerably if the targets are to be met.
- 15.2 Enfield's Housing and Growth Strategy (2020) was considered by Cabinet in January 2020 and approved at February's Council meeting (2020) and sets out the Council's ambition to deliver adopted London Plan and Core Strategy plus ambitious draft now adopted London Plan (2021) targets.
- 15.3 The Strategy sets five ambitions, the third of which is 'Quality and variety in private housing'. The key aims of the Strategy seek to address the housing crisis within the Borough. During consideration of the Cabinet report Members discussed the current housing situation and highlighted the rise in private sector rents in proportion to the average salary and the significant rise in homelessness. Enfield had one of the highest numbers of homeless households in the country. Insecurity and unaffordability of private sector housing has evidence-based links with homelessness. One of the most common reason for homelessness in London is currently due to the ending of an assured tenancy (often by buy to let landlords). MHCLG (2018) data shows a significant increase in the number of households in

Enfield using temporary accommodation – with a significant 67% increase between 2012 and 2018.

- 15.5 The fourth and fifth ambitions of the strategy are in respect of Inclusive placemaking; and accessible housing pathways and homes for everyone. While the Housing and Growth Strategy is not a statutory document it sets the Council's strategic vision, alongside metrics, in respect of housing delivery. It was approved at a February 2020 Council meeting. Its evidence, data and metrics are considered relevant material considerations.
- 15.6 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).
- 15.7 As mentioned elsewhere in this report, Enfield is a celebrated green Borough, with close to 40% of our Borough currently designated Green Belt or Metropolitan Open Land, and a further 400 hectares providing critical industrial land that serves the capital and wider south east growth corridors. The reality of these land designations means the call on optimisation of our brownfield land is greater and brings complex development issues and a major shift in how Enfield's character will need to transform.
- 15.8 In 2016/17, 30% of housing completions were affordable, whilst in 2017/18 this decreased to 7% of housing completions being affordable, amounting to 37 units in total being delivered. These figures show that the target 40% affordable housing delivery is not currently being met in the Borough. The Housing and Growth Strategy (2020) sets out an ambition to increase the target of 50% of new homes to be affordable housing in the next Local Plan. Enfield's Housing and Growth Strategy (2020) states the Borough's ambition to develop more homes that are genuinely affordable to local people, so more people can live in a home where they spend a more reasonable proportion of their household income on housing costs.
- 15.9 Taking into account both the housing need of the Borough together with the track record of delivery against target, it is clear that the Council must seek to optimise

development on brownfield sites such as this particularly those that are currently underused and not delivering any benefit to the wider area.

16. Affordable Housing

- 16.1 The NPPF must be taken into account in the preparation of local plans and is a material consideration in planning decisions. The NPPF defines Affordable Housing as “housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers)”. London Plan Policy H4 sets out a strategic target for 50% of all new homes delivered across London to be genuinely affordable.
- 16.2 Enfield sets a Borough-wide affordable housing target of 40% in Core Policy 3 but acknowledges the appropriate figure will need to take into account site-specific land values, grant availability and viability assessments, market conditions, as well as the relative importance of other planning priorities and obligations on the site.
- 16.3 DMD 1 supporting text notes that affordable housing comprises three tenures: social rent, affordable rent, and intermediate housing. Enfield’s Development Management Document Policy DMD 1 (Affordable Housing) states that development should provide the maximum amount of affordable housing with an appropriate mix of tenures to meet local housing need.
- 16.4 Following discussions, the proposed development as revised, would now deliver 100% affordable housing with all the units available at London Affordable Rent in excess of policy requirements. This is achieved through the allocation of grant funding from the GLA.
- 16.5 Due to the 100% affordable offer, Policy H5 (Threshold approach to applications) identifies this as a fast track application. Fast tracked applications are not required to provide a viability assessment at application stage.
- 16.6 A qualifying criterion does require the local planning authority to be satisfied regarding the tenure mix with Policy H5 stating: Developments which provide 75 per cent or more affordable housing may follow the Fast Track Route where the tenure mix is acceptable to the Borough or the Mayor where relevant.

16.7 Policy H6 of the London Plan (Affordable Housing Tenure) advises that the following split of affordable products should be applied to residential development:

- 1) 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
- 2) a minimum of 30 per cent intermediate products which meet the definition of genuinely affordable housing, including London Living Rent and London Shared ownership
- 3) 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.

16.8 The 2017 SHMA shows London's significant need for low-cost rental housing which is reflected in priorities for our own Borough; There is therefore presumption that the 40 per cent to be decided by the Borough will focus on Social Rent and London Affordable Rent given the level of need for this type of tenure across London.

16.9 In this instance the tenure mix of 100% London Affordable Rent is acceptable. The London Plan is committed to delivering genuinely affordable housing and within the broad definition of affordable housing, the Mayor's preferred affordable housing tenures includes London Affordable Rent.

16.10 London Affordable Rent is for households on low incomes where the rent levels are based on the formulas in the Social Housing Regulator's Rent Standard Guidance. The rent levels for Social Rent homes use a capped formula and London Affordable Rent homes are capped at benchmark levels published by the GLA. Rents are significantly less than 80 per cent of market rents, which is the maximum for Affordable Rent permitted in the NPPF.

17. Housing need mix and delivery

17.1 The proposed dwelling mix is set out in the table below and it is recognised that number of family units (13%) family units falls significantly short in provision of Policy CP5.

Proposed Dwelling Size Mix		
Dwelling Size	Number of Homes	Percentage
1B2P	41	38%
2B4P	51	48%
3B5P	14	13%
Total	106	100%

Adopted LBE Policy (Core Policy 5) criteria		
	Market Housing	Social Rented Housing
1 and 2 bedroom flats	20%	20%
2 bedroom houses	15%	20%
3 bedroom houses	45%	30%
4 bedroom houses	20%	30%

- 17.2 Officers have assessed the scheme in accordance with London Plan (2021) policies as well as having regard to the Council's development plan policies and the Council's current and emerging evidence around housing need. It is acknowledged the proposed mix is significantly weighted towards the 1 & 2 bedroom units which is not immediately consistent with local need and as a result there would be a preference for more larger family accommodation.
- 17.3 The proposed mix has been the subject of discussion to maximise the number of family units and the final position does have to be viewed in the context of the housing delivery test and the presumption in favour of approving sustainable development. Moreover, the current offer of 100% affordable housing at London Affordable Rent is significant and can be attributed considerable weight in the assessment
- 17.4 Taking this into account, and the tilted balance in favour of approving schemes for residential development, it is considered the low percentage of family housing can be accepted but only in the context of the location and the 100% LAR affordable housing offer which would be secured through a legal agreement.

18. Standard of accommodation

- 18.1 The NPPF (Section.12) identifies good design as a key aspect of sustainable development, stating that ‘the creation of high-quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve’.
- 18.2 Policy D6 of the London Plan sets out housing quality and design standards that housing developments must take into account to ensure they provide adequate and functional spaces; sufficient daylight and sunlight; avoid overheating; and maximise the provision of outside space.
- 18.3 The Policy notes that design must not be detrimental to the amenity of surrounding housing. Table 3.1 sets out the internal minimum space standards for new developments and Table 3.2 of the London Plan provides qualitative design aspects that should be addressed in housing developments. Despite the adoption of the London Plan 2021, the Housing Supplementary Planning Guidance Document (2016) remains an adopted document and a material consideration in decision making. The DMD contains several policies which also aim to ensure the delivery of new housing of an adequate quality, namely Policy DMD8 (General Standards for New Residential Development), DMD9 (Amenity Space) and DMD10 (Distancing).
- 18.4 The table below illustrates the residential (Houses and flats) compliance with national floorspace respective of the units sizes.

Unit Size	Floorspace provision range	Minimum floorspace expected	Accordance with criteria
1B2P	50m ² – 57.1m ²	50m ²	Y
2B3P	64m ² - 70.9m -	61m ²	Y
2B4P	70m ² – 92.1m ²	70m ²	Y
3B5P	88.7m ² – 91.4m ²	86m ²	Y

- 18.5 Dual aspect accommodation in the interests of outlook and ventilation should be sought for all accommodation as a minimum, and this scheme fails to provide it in this instance. Rather, the proposal would provide ‘enhanced’ single aspect accommodation by virtue of high level windows or an angled window onto the same aspect. This site is not constrained to the extent that this needs to occur and should therefore be reviewed accordingly.

18.6 A concern remains as to the outlook afforded to a number of flats facing onto trees. This needs further consideration as in many cases the outlook is considered to be poor, particular from single aspect units. Although the applicant has indicated the outlook would be 'green' and that the relevant sunlight and daylight assessments are not required, the LPA recognise that this relationship would not be beneficial for functioning residential accommodation and would place future pressure on their retention.

18.7 Although the level of dual aspect accommodation is 62.2%, there is no minimum number specified in London Plan D6 which the policy requiring the provision of dual aspect homes should be maximised in developments (New London Plan D6A). Although it is considered more dual aspect accommodation could be provided, given the tilted balance that applies, it is considered the scheme is acceptable and no grounds to refuse planning permission could be sustained on this point alone

20.1. The table below shows the analysis of dual aspect through the scheme.

Floor	Dual Aspect	Single Aspect	Total
GF	6 (75%)	2 (25%)	8
1F	9 (64.2%)	5 (35.7%)	14
2F	9 (64.2%)	5 (35.7%)	14
3F	9 (64.2%)	5 (35.7%)	14
4F	9 (64.2%)	5 (35.7%)	14
5F	9 (64.2%)	5 (35.7%)	14
6F	9 (64.2%)	5 (35.7%)	14
7F	3 (42.8%)	4 (57.1%)	7
8F	3 (42.8%)	4 (42.8%)	7
Total	66 (62.2%)	40 (37.7%)	106

21. Accessibility

21.1. Policies D5 and D7 of the London Plan set out that new developments are required to support mixed and inclusive communities, which includes provision for wheelchair accessible and wheelchair adaptable units, as well as an environment that is welcoming and accessible by all. Policy D7 of the London Plan sets out that in order to provide suitable housing and genuine choice for London's diverse population, including disabled people, older people and families with young children, residential development must ensure that:

1. At least 10% of dwellings meet Building Regulation requirement M4(3) 'wheelchair user dwellings',
2. all other dwellings meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings.'

21.2. Local Plan DMD Policy 8 has similar policy objectives.

21.3. It is noted that at least 10% of units in the scheme will be reserved as dedicated accessible homes in accordance with the Building Regulation 2010 requirement M4(3): "Wheelchair user dwellings". All other units will be designed in accordance with Building Regulation Standards M4(2), "Accessible and adaptable dwellings" to provide for other types of access needs and potential future requirements. In the event that the proposed development was acceptable in all other respects a condition would have been attached that requires the proposed development to comply with the above outlined standards.

19. Residential Amenity

Daylight/sunlight for Future Occupiers

22.1. The submitted Daylight/Sunlight assessment includes an analysis of whether the Proposed Development will receive adequate daylight/sunlight in the units and in public and communal amenity areas. In summary, the conclusions are:

Ground floor level:

22.2. Concern as to lack of defensible space / the requirement for privacy screens (likely 1.8m) and obscure glazing, proximity to trees (existing and those as part of the planting strategy) compounds access to outlook and sunlight

1st to 6th Floor:

22.3. Concern as proximity to trees (existing and those as part of the planting strategy) compounds access to outlook and sunlight for east and north facing units (potentially west for new trees) – See ADF also with ground floor next to trees and others that also share below criteria NSL (absence of corresponding daylight distribution)

22.4. Potential oblique mutual overlooking with neighbours to the north (12.2m to boundary – 18m to elevation) – some screening by retained trees would mitigate this (would mainly be central area).

7th to 8th Floor:

22.5. There are primarily single aspect units at these levels with (E and W) window openings.

Annual probable sunlight hours

22.6. Annual probable sunlight hours (APSH) for the new units is BRE compliant – however this fails to account for likely screening of trees and privacy screens

Overshadowing – Public and Communal Amenity Areas (Sunlight on the ground)

22.7. The majority of garden space receives at least 68.89% of 2 hours of sun which would be acceptable.

ADF

22.8. The table below indicates that there are window openings to habitable rooms throughout the proposed development that do not meet minimum BRE criteria.

Unit number	Floor	Room ID	Room Use	ADF Value	Meets BRE criteria
U1	First	R1	LKD	1.55	NO
U1	Second	R1	LKD	1.65	NO
U1	Second	R3	Bedroom	0.83	NO
U1	Third	R1	LKD	1.77	NO

U1	Third	R3	Bedroom	0.86	NO
U1	Fourth	R1	LKD	1.84	NO
U2	Seventh	R2	LKD	1.56	NO
U2	Eighth	R2	LKD	1.1	NO
U3	Seventh	R2	LKD	1.41	NO
U4	Seventh	R1	LKD	1.25	NO
U5	First	R2	LKD	1.42	NO
U5	Second	R2	LKD	1.45	NO
U5	Third	R2	LKD	1.47	NO
U5	Fourth	R2	LKD	1.48	NO
U5	Fifth	R1	LKD	1.48	NO
U5	Seventh	R1	LKD	1.54	NO
U6	First	R1	LKD	0.89	NO
U6	Second	R2	LKD	0.93	NO
U6	Third	R2	LKD	0.97	NO
U6	Fourth	R2	LKD	1.01	NO
U6	Fifth	R1	LKD	1.04	NO
U6	Sixth	R1	LKD	1.39	NO
U6	Sixth	R1	LKD	1.39	NO
U7	Second	R3	LKD	1.17	NO
U7	Third	R3	LKD	1.23	NO
U7	Fourth	R3	LKD	1.27	NO
U7	Fifth	R2	LKD	1.28	NO
U7	Sixth	R3	LKD	1.56	NO
U7	Seventh	R1	Kitchen	1.8	NO
U8	First	R1	LKD	1.00	NO
U8	Second	R1	LKD	1.12	NO
U8	Third	R1	LKD	1.17	NO
U8	Fourth	R1	LKD	1.22	NO
U8	Fifth	R1	LKD	1.25	NO
U8	Sixth	R1	LKD	1.64	NO
U11	First	R4	LKD	1.8	NO
U11	Second	R1	LKD	1.75	NO
U14	Ground	R2	Kitchen	1.3	NO
U14	First	R2	Kitchen	1.4	NO

U14	Second	R1	Kitchen	1.43	NO
U14	Third	R2	Kitchen	1.44	NO
U14	Fourth	R1	Kitchen	1.46	NO
U14	Fifth	R2	Kitchen	1.47	NO

Internal Lighting conditions

22.9. Officers are unable to ascertain which rooms the ADF relates to based on the details submitted. This is because the unit numbers and room IDs do not correlate to any of the diagrams submitted. In the absence of these details and daylight distribution values with units, there remains a concern that the proposed development would not be would acceptable in this regard.

Outlook

22.10. It is noted that poor levels of outlook would be experienced by ground, first and second floor flats due to the lack of defensible space at ground floor level and the encroachment of the trees to the west and north of the footprint of the proposed development. This element of the proposed development is considered to be unacceptable.

Child Playspace and Recreation Space and Landscaping

19.1. The rooftop garden is potentially susceptible to high winds and an inclement microclimate. It must be demonstrated that this will be a functional and safe. Parking bays are not ideal and could be better used to provide amenity. On street parking, or a rearrangement of the pavement could be used to provide street-based parking and free up space on site for play and greening. In the event that the proposed development was acceptable in all other respects a condition would have been attached requiring details of hard and soft landscaping to be submitted to the Council and approved in writing.

22.11. Policy S4 of the London Plan seeks to ensure that development proposals include suitable provision for play and recreation, and incorporate good-quality, accessible play provision for all ages, of at least 10 square metres per child, with

further detail provided in the Mayor’s ‘Shaping Neighbourhoods: Play and Informal Recreation’ SPG.

22.12. The applicant has calculated a playspace provision requirement of 404 sq.m. The development provides a total of 425sq.m of playspace aimed at children aged 0-4. Given the physical constraints of the site, the provision of offsite play space for older children is considered appropriate. It is noted that each play space is accessed by separate cores, in accordance with policy S4 London Plan, it must be demonstrated that playspace and equipment within the development is not segregated by tenure.

Amenity Space

22.13. DMD 9 outlines minimum private outdoor amenity space provision standards. London plan policy D6 states that where there are no higher local standards a minimum of 5sqm should be provided for 1-2 person dwellings and an extra 1sqm should be provided for each additional occupant. The London plan housing SPG indicates that where it is not possible to provide outdoor amenity providing in excess of the minimum space standard may be acceptable. The proposed development’s compliance with these standards are outlined in the table below:

Unit Size		Floorspace provision range (sqm)	Standard (sqm)	Proposed (sqm)	Accordance with criteria
Ground floor	1B2P	50	5	11.19	Yes
	1B2P	57	5	4.43	Yes
	1B2P	53	5	5.4	Yes
	2B4P	76	7	7.7	Yes
	2B4P	71	7	6.67	Yes
	2B4P	70.5	7	6.74	Yes
	3B5P	70	8	8.33	Yes
	3B5P	71	8	8.47	Yes
	1B2P	51	5	5.69	Yes

Floors 1 – 6	1B2P	57	5	5.47	Yes
	1B2P	50	5	5.5	Yes
	1B2P	51	5	5.38	Yes
	1B2P	53	5	5.4	Yes
	2B3P	71	6	7.67	Yes
	2B3P	71	6	7.39	Yes
	2B4P	70.63	7	6.53	Yes
	2B4P	71	7	6.65	Yes
	2B4P	92	7	6.85	Yes
	2B4P	76	7	9.69	Yes
	2B4P	76	7	7.95	Yes
	3B5P	89	8	8.58	Yes
	3B5P	92	8	8.7	Yes
Floors 7 – 8	1B2P	50	5	5.62	Yes
	1B2P	51	5	5.38	Yes
	1B2P	51	5	5.47	Yes
	1B2P	57	5	5.42	Yes
	2B3P	64	6	10.21	Depth of majority of the balcony needs to be increased.
	2B3P	64	6	10.89	Depth of majority of the balcony needs to be increased.
	2B4P	76	7	9.7	Yes

22.14. For the reasons outlined above the proposed development would be satisfactory in respect to the level or residential amenity provided. Concern is raised over the narrow balconies and 7th and 8th floor levels, however, this shortfall is considered to be within an acceptable tolerance.

Summary of Residential Quality and Amenity

22.15. Levels of access to natural daylight and sunlight/daylight distribution values have not been submitted. Therefore, officers are unable to ascertain whether the impact identified would be within an acceptable tolerance.

20. Neighbouring Residential Amenity

23.1. London Plan Policy D6 notes that development proposals should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context, whilst avoiding overheating, minimising overshadowing and maximising the usability of outside amenity space. Policy CP30 of the Local Plan seeks to ensure that new developments have appropriate regard to their surroundings, and that they improve the environment in terms of visual and residential amenity. Lastly Enfield Policies DMD 6 and 8 seek to ensure that residential developments do not prejudice the amenities enjoyed by the occupiers of neighbouring residential properties in terms of privacy, overlooking and general sense of encroachment.

BRE Guidance - Daylight and Sunlight:

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

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

BRE Guidance – Daylight to Existing Surrounding Buildings:

- 23.4. The BRE Guidelines stipulate that... “the diffuse daylighting of the existing building may be adversely affected if either: the VSC [Vertical Sky Component] measured at the centre of an existing main window is less than 27%, and less than 0.8 times its former value the area of the working plane in a room which can receive direct skylight is reduced to less than 0.8 times its former value.” (No Sky Line / Daylight Distribution).
- 23.5. At paragraph 2.2.7 of the BRE Guidelines it states: “If this VSC is greater than 27% then enough skylight should still be reaching the window of the existing building. Any reduction below this level should be kept to a minimum. If the VSC, with the development in place is both less than 27% and less than 0.8 times its former value, occupants of the existing building will notice the reduction in the amount of skylight. The area lit by the window is likely to appear more gloomy, and electric lighting will be needed more of the time.”
- 23.6. The degree of harm on adjacent properties and the daylight targets within a proposed scheme should be assessed drawing on broadly comparable residential typologies within the area and of a similar nature across London. Decision makers should recognise that fully optimising housing potential on large sites may necessitate standards which depart from those presently experienced, but which still achieve satisfactory levels of residential amenity and avoid unacceptable harm.’
- 23.7. The applicant has suggested that the reduced measure of VSC of 18%, as opposed to 27% should be used the consider this scheme as they are of the opinion that the existing/proposed building relationships are more akin to urban configurations similar to mews type development.

BRE Guidance - Sunlight to Existing Buildings:

- 23.8. The BRE Guidelines (2011) state in relation to sunlight at paragraph 3.2.11: “If a living room of an existing dwelling has a main window facing within 90 degrees of due south, and any part of a new development subtends an angle of more than 25 degrees to the horizontal measured from the centre of the window in a vertical section perpendicular to the window, then the sunlighting of the existing dwelling may be

adversely affected. This will be the case if the centre of the window: Receives less than 25% of annual probable sunlight hours, or less than 5% of annual probable sunlight hours between 21 September and 21 March and Receives less than 0.8 times its former sunlight hours during either period and has a reduction in sunlight received over the whole year greater than 4% of annual probable sunlight hours.”

BRE Guidance - Open Spaces

- 23.9. The Guidelines state that it is good practice to check the sunlighting of open spaces where it will be required and would normally include: ‘gardens to existing buildings (usually the back garden of a house), parks and playing fields and children’s playgrounds, outdoor swimming pools and paddling pools, sitting out areas such as those between non-domestic buildings and in public squares, focal points for views such as a group of monuments or fountains’.
- 23.10. At paragraph 3.3.17 it states: “It is recommended that for it to appear adequately sunlit throughout the year, at least half of a garden or amenity area should receive at least two hours of sunlight on 21 March. If as a result of new development an existing garden or amenity area does not meet the above, and the area which can receive two hours of sun on 21 March is less than 0.8 times its former value, then the loss of sunlight is likely to be noticeable. If a detailed calculation cannot be carried out, it is recommended that the centre of the area should receive at least two hours of sunlight on 21 March.”

Daylight/Sunlight Analysis

- 23.11. Concerns have been raised during the consultation process from neighbouring properties in respect of the impact of the proposed development on surrounding daylight and sunlight leading to an impact on residential amenity.
- 23.12. A ‘Daylight & Sunlight Impacts to Neighbouring Properties’ report has been submitted as part of the application and based on proximity to the Proposed Development, assessing Vertical Sky Component method (VSC), Annual Probable Sunlight Hours (APSH) and Winter Probable Sunlight Hours (WPSH) and overshadowing and the following properties were identified as relevant for daylight and sunlight assessment:

- 4 - 16 Moorfield Road
- 253 – 275* Hertford Road (*potential error and shall be noted as 273)
- 233 – 249* Hertford Road (*potential error as No.251 Hertford Road aka 1 Carterhatch, an upper floor residential unit and Nos. 233 – 241 Hertford Road aka 2 Cedar Avenue (Narev Court) have been omitted)
- 43 - 56 Carterhatch Lane
- 1 - 43 Moorfield Road

Vertical Sky Component

Nos. 4 - 16 Moorfield Road:

- 23.13. A row of two storey terraced houses located to the north of the development. The Proposed development (north facing elevation) would be located 14m from the rear boundary of No.4 Moorfield Road and 9.5m from the rear boundary of No.16 Moorfield Road.
- 23.14. The Proposed nine storey development (north facing elevation) would be 17.4m from the rear elevation of No.4 Moorfield Road and 22.8m from the rear elevation of No.16 Moorfield Road.
- 23.15. The existing residential windows surveyed to the rear of this row of houses are in excess of 32.42% (VSC), the highest being 36.27% (VSC). As a result of the Proposed Development, all windows would remain above 18% VSC (which might be considered appropriate in an older mews development setting) , however a number of windows would result in significant reductions, the highest ratio reduction would be 0.59 (some 41% reduction of its former value), from 33.53% and 33.92% down to 20.69% and 19.92% respectively.
- 23.16. It is considered that this level of reduction, upon the light levels of these modest 2 storey houses is not acceptable.



Nos. 253 - 273 Hertford Road:

- 23.17. A row of buildings between two and three storeys in height, with commercial uses at ground floor level and residential uses above, located to the east of the development. The Proposed development (east facing elevation) would be 27m from the front elevation of No.253 Hertford Road and beyond 50m from the front elevation of No.273 Hertford Road.
- 23.18. The residential windows surveyed are in excess of 36.58% (VSC), the highest being 36.74% (VSC).
- 23.19. As a result of the Proposed Development, all windows would remain above 18% VSC, however a number of windows would result in significant reductions, the highest ratio reduction would be 0.58 (42% reduction of its former value), from 36.71 to 21.19. The percentage reduction in this particular context, across a London street, is so high whilst using the reduced 18% VSC target confirms the unacceptability of the bulk and mass of the scheme at this point.



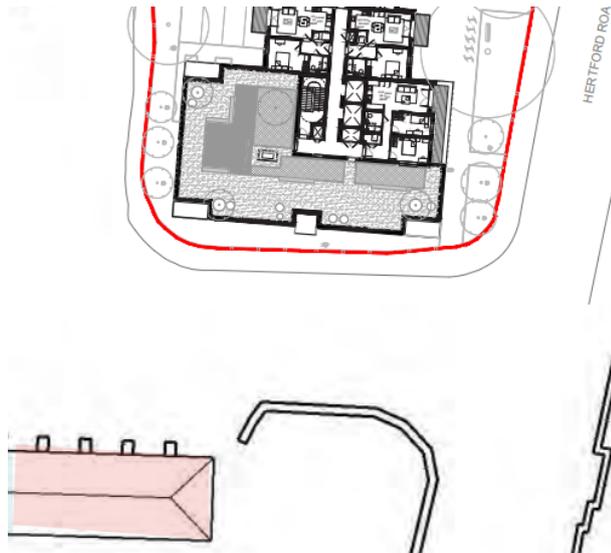
Nos. 233 - 249 Hertford Road:

- 23.20. A row of buildings between one, two and four storeys in height, with commercial uses at ground floor level and residential uses above, except No.241 Hertford Road (Narev Court), a purpose built residential block on the corner with Cedar Avenue, located to the east of the development. The Proposed development (east facing elevation) would be 25m from the front elevation of No.249 Hertford Road and beyond 30m from the front elevation of Nos. 233 – 241 Hertford Road aka 2 Cedar Avenue (Narev Court).
- 23.21. The residential windows surveyed are in excess of 36.63% (VSC), the highest being 36.95% (VSC). As a result of the Proposed Development, all windows would remain above 18% VSC, however a number of windows would result in significant reductions, the highest ratio reduction would be 0.56 (44% reduction of its former value), from 36.92 and 36.95 to 20.69 and 20.87 respectively.



Nos. 43 - 56 Carterhatch Lane:

- 23.22. A four to five storey purpose built residential block, located to the south of the development. The Proposed development (south facing elevation) would be more than 24m from the front elevation of this block.
- 23.23. The residential windows surveyed are in excess of 26.98% (VSC), the highest being 38.95% (VSC). As a result of the Proposed Development, all windows would remain above 18% VSC. The most significant reductions would be 0.74 (26% reduction of its former value), from 37.51 to 28.62.



Nos. 1 - 43 Moorfield Road

23.24. A four to five storey purpose built residential block, located to the west of the development. The Proposed development (west facing elevation) would be more than 20m (closest point) from the front elevation of this block.

23.25. The residential windows surveyed are in excess of 23.47 % (VSC), the highest being 38.18% (VSC). As a result of the Proposed Development, 13 of the 140 windows would fail to remain above 18% VSC reaching, 15.31, 12.27, 12.10, 13.45, 14.08, 5.72, 5.92, 5.05, 6.05, 7.88, 14.80, 16.22, 17.52. The most significant reductions would be 0.21 (79% reduction of its former value), from 23.71 to 5.05.



Annual Probable Sunlight Hours (APSH) and Winter Probable Sunlight Hours (WPSH)

23.26. Annual Probable Sunlight Hours (APSH) and Winter Probable Sunlight Hours (WPSH) is a measure of sunlight that a given window may expect over a year period unobstructed to the ground. BRE guidance recommends that the APSH received at a given window in the proposed case should be at least 25% of the total available, including at least 5% in the winter months between 21 September and 21 March. If the available sunlight hours are both less than the amounts above and less than 0.8 times their former value either over the whole year or just in the winter months (21 September to 21 March) then the occupants of the existing building will notice the

loss of sunlight; if the overall annual loss is greater than 4% of APSH, the room may appear colder and less cheerful and pleasant.

Nos. 4 - 16 Moorfield Road:

23.27. The residential windows surveyed to the rear are in excess of 74 (APSH) and 24 (WPSH). As a result of the Proposed Development, all windows would remain above 53 (APSH) and 8 (WPSH), however a number of windows would result in significant reductions, the highest ratio reduction would be 0.67 - 33% reduction of its former value (APSH) and 0.28 – 72% reduction of its former value (WPSH).

Conclusion of Daylight & Sunlight

23.28. The loss of sunlight and daylight is considered to result in significant harm to the living conditions of occupiers of these existing residential properties. It is concluded that the Proposed Development would have a harmful effect on the living conditions of local residents through a harmful loss of sunlight and daylight to the occupiers contrary to the policies outlined above.

Overshadowing

23.29. In addition to the above daylight and sunlight assessment the applicants also undertook an overshadowing analysis of nearby relevant properties.

23.30. BRE guidance recommends that for it to appear adequately sunlit throughout the year, at least half (50%) of a garden or amenity area should receive at least two hours of sunlight on 21 March. If as a result of new development an existing garden or amenity area does not meet the above and the area which can receive 2 hours of sun on 21 March is less than 0.8 times its former value, then the loss of sunlight is likely to be noticeable.

Nos. 1 - 43 Moorfield Road

23.31. The residential gardens surveyed to the front are in excess of 73%, the highest being 96.43%. As a result of the Proposed Development, 5 gardens would fail to remain above 50%, reaching, 40%, 36.67%, 42.31, 40% and 43.33%. The most significant reductions would be 0.45 (55% reduction of its former value), from 76.92% to 42.31%.

Nos. 4 - 16 Moorfield Road:

- 23.32. The residential gardens surveyed to the rear are in excess of 73.86%, the highest being 89.48%. As a result of the Proposed Development, 6 out of 7 gardens would fail to remain above 50% with No.4 (49%), No.6(20%), No.8(0%), No.0(0%), No.12(0%), No.14(16.25%), whilst No.16 would comply (81.27% possible error). The most significant reductions would be at Nos 8, 10 and 12 which would see losses of 100% of its former value.
- 23.33. Open areas to the south of Carterhatch Road, west of Moorfield Road and east of Nos. 4 - 16 Moorfield Road.
- 23.34. The proposal would not result in a significant reduction to these areas of public open spaces.

Conclusion of Overshadowing

- 23.35. The increase in overshadowing is considered to result in significant harm to the living conditions of occupiers of these residential properties.

Conclusion of Privacy and Overlooking

- 23.36. Objections have been received in respect of privacy impacts. These include objections received from neighbouring properties along Moorfield Road. These objections raise concerns that privacy impacts will be exacerbated by the proximity of the Proposed Development.
- 23.37. London Plan Policy D6 notes that development proposals should provide sufficient daylight and sunlight to new and surrounding housing. Policy D6d states that the design of development should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context, whilst avoiding overheating, minimising overshadowing and maximising the usability of outside amenity space.
- 23.38. The Mayor of London's Housing SPG does not support adhering rigidly to visual separation measures as they can limit the variety of urban spaces and housing types in the city. Standard 28 of the Mayor of London's Housing SPG states that design

proposals should demonstrate how habitable rooms within each dwelling are provided with an adequate level of privacy in relation to neighbouring property, the street and other public spaces.

- 23.39. Adopted Enfield Policies DMD 6 and 8 seek to ensure residential developments do not prejudice the amenities enjoyed by the occupiers of neighbouring residential properties and Policy CP30 of the Local Plan seeks to ensure that new developments have appropriate regard to their surroundings, and that they improve the environment in terms of visual and residential amenity. Adopted Enfield Policies DMD 6 and 8 seek to ensure that residential developments do not prejudice the amenities enjoyed by the occupiers of neighbouring residential properties in terms of privacy, overlooking and general sense of encroachment. Adopted Enfield Policy DMD10 is silent on this type of relationship, but requiring that development not compromise adjoining sites.

Nos. 4 - 16 Moorfield Road:

- 23.40. The Proposed development (north facing elevation) would be 14m from the rear boundary of No.4 Moorfield Road and 9.5m from the rear boundary of No.16 Moorfield Road. The Proposed development (north facing elevation) would be 17.4m from the rear elevation of No.4 Moorfield Road and 22.8m from the rear elevation of No.16 Moorfield Road. Concern is raised over the fact that the proposed development would rise nine storeys in height (the top two being recessed from the north elevation) and would be 30m in width from ground floor level. From ground to six floor level, each floor contains a considerable amount of glazing associated with windows serving primarily habitable rooms. From sixth floor level communal and private amenity spaces are sited.

Nos. 253 - 273 Hertford Road:

- 23.41. The Proposed development (east facing elevation) would be 27m from the front elevation of No.253 Hertford Road and beyond 50m from the front elevation of No.273 Hertford Road.
- 23.42. The Proposed development would rise nine storeys in height (the top two being recessed from the north elevation) and would be 57m in width from ground floor level. From ground to six floor level, each floor contains a considerable amount of glazing

associated with windows serving primarily habitable rooms, along with private projecting balconies.

Nos. 233 - 249 Hertford Road:

23.43. The Proposed development (east facing elevation) would be 25m from the front elevation of No.249 Hertford Road and beyond 30m from the front elevation of Nos. 233 – 241 Hertford Road aka 2 Cedar Avenue (Narev Court).

23.44. The Proposed development would rise nine storeys in height (the top two being recessed from the north elevation) and would be 57m in width from ground floor level. From ground to six floor level, each floor contains a considerable amount of glazing associated with windows serving primarily habitable rooms, along with private projecting balconies.

Nos. 43 - 56 Carterhatch Lane:

23.45. The Proposed development (south facing elevation) would be more than 24m from the front elevation of this block.

23.46. The Proposed development would rise nine storeys in height (the top two being recessed from the south elevation) and would be 30m in width from ground floor level. From ground to six floor level, each floor contains a considerable amount of glazing associated with windows serving primarily habitable rooms, along with private projecting balconies.

Nos. 1 - 43 Moorfield Road

23.47. The Proposed development (west facing elevation) would be more than 20m (closest point) from the front elevation of this block.

23.48. The Proposed development would rise nine storeys in height (the top two being recessed from the west elevation) and would be 57m in width from ground floor level. From ground to six floor level, each floor contains a considerable amount of glazing associated with windows serving primarily habitable rooms, along with private projecting balconies.

Conclusion of Privacy and Overlooking

- 23.49. The loss of privacy, in particular as would be experienced in the rear amenity spaces of the existing houses at 4 to 16 Moorfield Road is considered to result in significant harm to the living conditions of occupiers of these residential properties as a result of the Proposed Development

Outlook

Nos. 4 - 16 Moorfield Road:

- 23.50. The Proposed development would rise 33m in height, with a shoulder height of 25m (the top two being recessed from the north elevation), where Nos. 4 - 16 Moorfield Road rise 5.7m in height. As a result, the Proposed development would detrimentally obstruct (extend far above a 25-degree line) the occupier outlook from the lowest windows within these buildings.

Nos. 253 - 273 Hertford Road:

- 23.51. The Proposed development would rise 33m in height, with a shoulder height of 25m (the top two being recessed from the north elevation), where Nos. 253 - 273 Hertford Road rise 11.95m in height. As a result, the Proposed development would detrimentally obstruct (extend far above a 25-degree line) the occupier outlook from the lowest windows within these buildings.

Nos. 233 - 249 Hertford Road:

- 23.52. The Proposed development would rise 33m in height, with a shoulder height of 25m (the top two being recessed from the north elevation), where Nos. 233 - 249 Hertford Road rise 12.3m in height. As a result, the Proposed development would detrimentally obstruct (extend far above a 25-degree line) the occupier outlook from the lowest windows within these buildings.

Nos. 43 - 56 Carterhatch Lane:

- 23.53. The Proposed development would rise 33m in height, with a shoulder height of 25m (the top two being recessed from the north elevation), where Nos. 43 - 56 Carterhatch

Lane rise 12m in height. As a result, the Proposed development would detrimentally obstruct (extend far above a 25-degree line) the occupier outlook from the lowest windows within these buildings.

Conclusion of Outlook

23.54. The loss of outlook is considered to result in significant harm to the living conditions of occupiers of these residential properties. It is concluded that the siting of the Proposed Development in relation to nearby occupiers would have a harmful effect on the living conditions of occupiers of the residents through a harmful loss of outlook to the occupiers. I also consider that the building would result in significant overbearing and a greater sense of enclosure to the occupiers of 4 to 16 Moorfield Road

Noise and Disturbance

23.55. Guidance relevant for the assessment of noise affecting new developments is given in the National Planning Policy Framework (NPPF). Paragraph 185 sets out that that new development should be appropriate for its location, taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should seek to a) 'mitigate and reduce to a minimum, potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life'.

23.56. Meanwhile Policy D14 of the London Plan sets out that in order to reduce, manage and mitigate noise to improve health and quality of life, residential... development proposals should manage noise by, amongst other things: '3) mitigating and minimising the existing and potential adverse impacts of noise on, from, within, as a result of, or in the vicinity of new development without placing unreasonable restrictions on existing noise generating uses', and '4) improving and enhancing the acoustic environment and promoting appropriate soundscapes...'. Lastly, the London Plan introduces the concept of 'Agent of Change' which places the onus on the new development to ensure adequate noise mitigation measures are in place if their development will be close to a noise generating use.

- 23.57. The proposed residential development is consistent with the existing prevailing residential use in the area and it is therefore unlikely that any unacceptable levels of noise will be generated as result of the residential element of the development.
- 23.58. With regards to noise impact to future occupiers of the Development, the submission documents include an Environmental Noise Assessment which recommends mitigation measures are implemented to address ground borne noise and vibration impact. These measures could include suitable glazing. In order for noise and vibration levels to remain at an acceptable level and in the event that the proposal was acceptable in all other respects a planning condition would have been recommended to secure this in line with relevant policy and guidance as outlined above.
- 23.59. With regards to occupier amenity it is recognised that most developments in urban areas will be subject to noise levels above the BS8233 recommended levels for balconies. However, it is reasonable to assume that future occupiers would prefer the option to have a noisier balcony as opposed to having no balcony at all.
- 23.60. Furthermore, it is acknowledged that there are no other noise mitigation measures available for balconies other than fully enclosing them (i.e. 'winter gardens'), which essentially changes the balconies into internal rooms. On this basis the development is considered acceptable in relation to noise levels in external to private amenity areas.

Conclusion of Neighbouring Amenity Considerations

- 23.61. Objections have been raised by local residents in respect of loss of light arising from the development. Officers have carefully considered these objections (looking at impacts on the properties listed above) and consider that the impacts would result in unacceptable harm to the living standards of neighbouring properties.
- 23.62. Officers have assessed the impacts in light of NPPF Paragraph 125(c) – which states that local planning authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site (as long as the resulting scheme would provide acceptable living standards). Taking into account existing levels of light to the properties and the urban context of the site, it is considered that the analysis satisfactorily demonstrates harm significant enough to render the scheme unacceptable.

23.63. With regards to potential noise and disturbance arising from the use/occupation of the development it is noted that there is some level of concern from neighbouring occupiers in relation to this, however the proposed new measures, would ensure that noise and vibration levels would remain at an acceptable level, despite the intensification of the use.

23.64. For the reasons considered above the proposed development is not considered to be acceptable in terms of amenity impact to neighbouring occupiers contrary to policies DMD 8, 37 & 68 of the development management document, CS Policy 4 of the Core Strategy and London Plan Policies D4, D6 and D14.

21. Transportation, parking and highways

24.1. London Plan 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.

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

24.3. 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 so as to provide everyone with the opportunity to decide how they choose to travel, be that by car, public transport or walking and cycling. 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.

- 24.4. The site is located on the corner of Carterhatch Lane and Hertford Road, and was previously in use as a medical centre, but this has since closed. Vehicular access is currently and is proposed to remain from Moorfield Road, which is an adopted unclassified road accessed from Carterhatch Lane. Hertford Road and Carterhatch Lane are both classified roads with double yellow lines preventing parking at any time, and there is a zebra crossing to the immediate south of the site on Carterhatch Lane.
- 24.5. The site has a PTAL of 2, which is low. There are double yellow lines along much of Moorfield Road at the London Fire Brigade request, as there was already an issue with parked vehicles blocking access. This has further reduced the available on-street space for any off-site parking or servicing.
- 24.6. This proposal is for 106 residential units (comprising of 42 x 1-bed, 51 x 2-bed and 14 x 3-bed), as well as 10 car parking spaces (3 of which are disabled parking bays) and 192 cycle parking spaces. The 10 car parking spaces would mean that this development would be what we would term as car free.
- 24.7. Given the low PTAL of this site, a car-free development would only be suitable in this location if a Car Parking Zone (CPZ) was implemented, and occupants of the new development are exempted from being eligible for residential permits for that or any future CPZ. In order to establish the CPZ we would require £25,000 towards consultation and implementation of a CPZ. We note that the submitted TA refers to the CPZ, saying that the CPZ would be created and funded by the developer.
- 24.8. Due to the low PTAL there would also be an expectation that significant improvements to the cycling offer to the local community, further our Healthy Streets team stated that there is an ambition to improve the crossing opposite the site on Carterhatch Lane, as well as the cycle lane width on the northern side adjacent to the

development. Since the standard contributions expected from a scheme of this size towards Cycle Enfield would be in the region of £31,775 (based on our contributions calculator) this could take the form of a sliver of land on the Carterhatch Lane / Hertford Road frontages being contributed, and money towards the works required. The submitted documents however refer to the Hertford Road cycle lane works as being fully funded and as result, this needs further discussion as there is no agreement in place regarding contributions towards cycle Enfield and associated infrastructure. Without this and the required CPZ, then a car free development of this nature cannot be supported.

- 24.9. In addition, if the proposed development was acceptable in all other respects the Council would have requested general Sustainable Transport contributions in line with our contributions calculator. This would require a payment of £43,845 towards sustainable transport measures.
- 24.10. We note that the 10 car parking spaces have been designed so that they are accessible via two separate access points, which reduces reliance on Moorfield Road. The Transport Assessment refers to a Car Park Management Plan (CPMP) which considers how additional disabled parking bay (DPB) provision could be achieved in the future if demand increased (the London Plan requires that at the outset DPBs are provided for 3% of dwellings, which the proposed 3 DPBs achieves; however it also requires that the proposal demonstrates how up to 10% of dwellings could be provided with DPBs if required), however this CPMP did not appear to be included within the application documents, so we cannot properly assess how this would be achieved.
- 24.11. The London Plan also states that 20% of parking bays at residential development should include full electric charging capabilities, whilst the remaining bays must all have passive charging capabilities. While it is possible for this to be achieved, it is not confirmed. In the event that the proposed development was acceptable in all other respects 2 of the 10 parking spaces would need to have active EV charging and the remaining 8 to have passive provision. The TA refers to a car club bay being provided on site, and this is generally welcomed. However, it is not clear where this car club bay is located.

Cycle parking

24.12. The development requires a total of 192 long stay cycle parking spaces and 4 short stay spaces. There are 2 internal separate dedicated cycle parking stores at ground floor level and 2 short stay parking spaces to the east of the site. In the event that the proposal was acceptable in all other respects a condition would have been attached that requires the proposed cycle storage facilities to accord with the requirements of the London Cycling Design Standards, to ensure adequate dimensions for door and aisle widths.

Delivery and servicing

24.13. With regards to servicing, we are concerned that the development places the burden of this onto Moorfield Road, by creating an on-street servicing layby on the public highway. Again, it is considered that in order to avoid disbenefit to the public, we would require that land to the front of the site on Carterhatch Lane / Hertford Road is passed to the Healthy Streets team to allow for further improvements to the highway and cycle infrastructure around the site.

24.14. If an on-street bay is created, it is important to maintain the footway around it, which does appear to encroach into the red line of the site. We would also need the applicants to fund the construction of the bay and the required orders etc for the double yellow line markings that would ensure the bay could only be used for loading and drop off / pick up.

24.15. A Delivery and Servicing Plan (DSP) has been submitted in the event that the proposed development was acceptable in all other respects the DSP would have been secured by way of condition. Concern is raised over the statement within the DSP that residential developments do not generate a high intensity of servicing. Given that this is a car free development for 106 residential units we would expect a higher number of delivery movements (online supermarkets, hyper online retailers etc) than we would for traditional car-owning occupants, but this does not appear to have been properly considered.

24.16. The DSP demonstrates that the refuse vehicle would reverse into the site from Moorfield Road and this would be within 10 metres of the bin store. Which would be acceptable.

Transport, parking and highways conclusion

24.17. The application site is located outside a controlled parking zone and in the absence of contributions towards the extension of the CPZ officers are unable to support a car free development in this location. For the reasons considered above officers are unable to support this element of the proposed development.

22. Waste Storage

25.1. London Plan policy SI 7 seeks to promote a more circular economy that improves resource efficiency, recycling and reductions in waste going for disposal. Referable applications should promote circular economy outcomes and aim to be net zero-waste. Core policy 22 of the Core Strategy states that the Council will:

- encourage on-site reuse and recycled materials,
- encourage on site reuse and recycling of construction, demolition and excavation waste;
- require appropriate provision to be made for on site waste treatment, storage and collection throughout the life time of the development.

2.1 It is indicated in the plans submitted that the refuse and recycling are will be located at ground floor level. It appears as though adequate storage space for refuse bins would be available. If the proposed development was acceptable in all other respects a condition would have been attached requiring details of refuse storage to be submitted to the Council and approved in writing. The applicant would need to demonstrate that the capacity of the refuse bins to meets the requirements of ENV08/162.

25.2. The applicant has submitted a circular economy statement to demonstrate that the proposed development has applied circular economy principles in line with the above London Plan policy. Officers are satisfied with the findings of this report.

25.3. Policy DMD 57 requires developers to produce site waste management plans (SWMP) to arrange for the efficient handling of construction, excavation and demolition waste and materials. Moreover, a Green Procurement and construction plan has not been submitted. In the absence of these details officers are unable to ascertain whether the proposed development would be consistent with these policies. If the proposed development was acceptable in all other respects a

condition would have been attached requiring these details to be submitted.

23. Flood Risk and Drainage

26.1. Policy DMD59 states that new development must avoid and reduce the risk of flooding, and not increase the risk elsewhere. Policy DMD 61 states that a drainage strategy will be required for all development to demonstrate how proposed measures manage surface water as close to its source as possible and follow the drainage hierarchy in the London Plan. The policy requires that a development such as the one proposed must achieve greenfield run off rates and must maximise the use of SuDS by including several treatment phases.

26.2. From our surface water flood risk assessment, we interpolate the flood level to be ~20mAOD. This means that the FFLs must be at least 20.10mAOD (not 20.0mAOD). Is this level reflected in the ground floor drawings?

26.3. Appendix E of the FRA and Drainage Strategy seems to be missing. We are therefore unable to determine if the proposed SuDS Strategy meets the requirements of DMD Policy 61.

26.4. For example:

1. Suitability

It is not clear if the London Plan Drainage Hierarchy has been followed; it is not clear why a Type C (no infiltration) system is proposed for the permeable paving, partial infiltration should be allowed to occur. While above ground storage features have been mentioned, below ground storage has also been mentioned, so it is not clear if above ground storage has been maximised; Has source control SuDS measures been utilised for all the hardstanding and roof runoff (see)?

2. Quantity

What is the proposed discharge rate; this should be greenfield runoff rate for the 1 in 1 year and 1 in 100 year (plus climate change) events, or Qbar if one discharge rate is utilised; It is not clear if the proposed storage enables greenfield runoff rates to be achieved and how attenuation is achieved

3. Quality

Source control SuDS measures must be used extensively for the hardstanding and roof areas. We must ensure that the majority of hardstanding and roof areas (with the target of 100%) are drained via source control SuDS measures. Green roofs, channels and rills, and swales were mentioned in the report, but it is not clear where these are located and what areas they are draining. RWPs must discharge on the surface of source control SuDS feature rather than into the sub-base, as this will cause siltation

4. Functionality

Cross sections, sizes and specifications of the proposed SuDS features must be provided. Overland flow routes for exceedance events including spot levels must be submitted. The Management Plan for future maintenance must be submitted

26.5. If the proposed development was acceptable in all other respects a condition would have been attached requiring these details to be submitted.

24. Ecology and biodiversity

27.1 The London Plan, the Core Strategy, and the DMD seek to protect and enhance biodiversity. Policy DMD 79 states that developments resulting in the creation of 100m² or more, or the creation of one or more net dwellings should provide on-site ecological enhancements and Policy DMD 81 states that development must provide high quality landscaping that enhances the local environment. Most developments can provide ecological enhancements to improve the biodiversity offer on that site. Enhancements could range from anything such as bird boxes to wildlife friendly landscaping or green roofs, but enhancements should be scaled to reflect the size and scale of the proposed development.

27.2 Policy DMD 55 requires all major developments to use as much roof space and vertical surfaces as technically and economically feasible for the installation of zero carbon technologies, green roofs, and living walls. Such measures will also contribute to flood risk management. Any proposal should also demonstrate how it conforms to the Drainage Strategy.

27.3 We would advise the inclusion of suitable enhancements such as, but not limited to, bird/bat boxes designed into the fabric of the building and in surrounding trees and the planting of appropriate native species.

27.4 The Proposed Development will not result in the disturbance of any existing habitats biodiversity gain. When measured against Natural England's Biodiversity Metric 2.0 Calculator, it was found the proposed development would result in a 30.80% biodiversity net gain which exceeds requirements of the forthcoming Bill by some margin.

25. Sustainability, design and construction

Air Quality / Pollution

28.1. The air quality assessment demonstrates that the development type is suitable at this site. In the event that the proposed development was acceptable in all other respects the mitigation measures detailed within the report would have been conditioned.

Carbon emissions

28.2. Policy DMD 49 states all new development must achieve the highest sustainable design and construction standards and include measures capable of mitigating and adapting to climate change to meet future needs having regard to technical feasibility and economic viability. Policy DMD51 states further energy efficiency standards and that all developments will be required to demonstrate how the proposal minimises energy-related CO₂ emissions which must adhere to the principles of the energy hierarchy in the policy. This follows policy CP20 of the Core Strategy which states that the Council will require all new developments, and where possible via retrofitting process in existing development to address the causes and impacts of climate change by: minimising energy use; supplying energy efficiently; and using energy generated from renewable sources in line with the London Plan and national policy. The adopted policies require that new developments achieve the highest sustainable design and construction standards having regard to technical feasibility and economic viability. A 35% CO₂ reduction is required for new residential units.

28.3. In light of the above an energy and sustainability statement has been supplied by the applicant. It is indicated in the submitted statement that the proposed development achieves an overall improvement in emissions over the Building Regulations Part L

standards for regulated emissions of minimum of 102.06% and 101.53%. In the event that the proposed development was acceptable in all other respects a condition would have been attached to the decision notice requiring the proposed development to be implemented in accordance with the submitted energy and sustainability statement.

Water efficiency

- 28.4. Details of water efficiency measures would also need to be provided to demonstrate water consumption per person per day equal to or less than 105 litres. A condition requiring compliance with these details would have also been attached had the proposed development been acceptable in all other respects.

Climate Change

- 28.5. The submitted and whole life carbon assessment demonstrates that the proposed development would be consistent with GLA standards.

Health

- 28.6. The Proposed Development could be expected to result in the provision of housing, additional local spending by residents of the new development, and the provision of private amenity space. Taking the above into consideration, overall it is considered that some positive environmental effects on socio-economics would arise as a result of the development

26. Environmental Considerations

- 29.1 Environmental Health have reviewed the application and have no objections subject to conditions pertaining to noise from plant and piling, Non-Road Mobile Machinery (NRMM), contaminated land and air quality required.

- 29.2 To the application for planning permission as there is unlikely to be a negative environmental impact. In particular there are no concerns regarding air quality or contaminated land.

The application contains an acoustic report which proposes suitable glazing for the development. The same document also proposes noise limits for plant, as the plant to be installed is not currently known it would be more appropriate to condition the

mechanical plant

27. **Education**

30.1 The scheme will be liable for education and childcare contributions for the net increase of units on site, in accordance with the adopted s106 SPD. In the event that the proposed development was acceptable in all other respects these contributions would have been secured via an s106 legal agreement.

28. **Fire Safety**

31.1. In accordance with Policy D12 'Fire safety' of the Mayor's London Plan, the applicant has submitted an outline fire statement, produced by a third party suitable qualified assessor. Information is provided on means of escape, features to reduce risk to life such as sprinklers and access for fire service personnel.

31.2. The building is served via two stairs that are non-accessible to each other on the upper floors. The upper floors consist solely of apartments and two rooftop terraces, one accessed via each stair, on the Seventh Floor. There are also apartments on Ground Floor along with non-residential areas (Bin Store, Cycle Store, Plant Areas) as well as an Entrance Lobby. The design of Moorfield Road residential development, with regard to fire safety, has been developed to ensure full compliance with both current Building Regulations and the Approved Documents and/or supporting British Standards (guidance).

31.3. The recent amendments to the Building Regulations restricting the use of combustible materials in residential buildings have been considered in this design, therefore all materials used in the construction of the external walls of both blocks will be of European Class A2-s1, d0 or better, other than permitted exceptions. Cavity barriers will be provided around all openings, and at the junction of every fire-resisting wall and floor with an external wall.

31.4. All apartments are to be provided with detection throughout all rooms in addition to the sprinkler protection required as part of the building exceeding 11m in height to the topmost habitable storey. The design of the system will be in full accordance with British Standards and will extend to all areas on the Ground Floor.

31.5. The scheme is provided with two firefighting stairs which are contained within 120-minute fire rated construction of the firefighting shafts. Ventilation will be provided in the stair lobbies/corridors to prevent smoke spread to enable safe escape and access by the fire service. The Community/Commercial Space is full separated from the residential areas via fire rated construction and will be treated as separate entities.

31.6. Fire Service access for the building is via a firefighting stair that serves every floor, both shafts are accessed via protected corridors from the external. Dry risers will be required in each firefighting stair and also serve every storey.

29. Security

32.1. The Metropolitan Police have reviewed the development and have raised concerns. The DOC officers were unable to support the development as it been presented as they had serious concerns that the design will contribute to and may increase the opportunity for crime and Anti-Social Behaviour at this location, putting the new and existing residents at risk. In order to manage this potential for increased crime and anti-social behaviour a prior to occupation condition was suggested that requires Certificate of Compliance to the relevant Secure by Design Guide(s) or alternatively achieve Crime Prevention Standards submitted to and approved in writing by the Local Planning Authority in conjunction with the Metropolitan Police. In the event that the proposed development was acceptable in all other respects a condition would have been attached requiring these details to be submitted.

30. **Equality Duty and Human Rights**

18.1. Section 149 of the Equalities Act 2010 places obligations on local authorities with regard to equalities in decision making. It is considered that this application does not raise any equality implications or conflict with development plan policies in this regard.

31. **Community Infrastructure Levy (CIL)**

CIL

33.1. As of the April 2010, legislation in the form of CIL Regulations 2010 (as amended) came into force which would allow 'charging authorities' in England and Wales to

apportion a levy on net additional floorspace for certain types of qualifying development to enable the funding of a wide range of infrastructure that is needed as a result of development.

Mayoral CIL

33.2. The Mayor of London charges CIL in Enfield at the rate of £60 per sqm.

Enfield CIL

33.3. As of 1st April 2016 Enfield, has been charging CIL at the rate of £60 per sqm lower Rate Cil Zone).

33.4. In this instance the development would be *Mayoral and Enfield* CIL liable but as all the units proposed are social housing it would benefit from relief and no CIL would be payable.

32. **Conclusion**

34.1. *Presumption in Favour of Sustainable Development*

In the three years up to and including 2020 the London Borough of Enfield delivered 56% of its 2,328 homes target. This means that Enfield has failed to meet the Housing Delivery Test set out in the National Planning Policy Framework 2021, as set by central government. Per paragraph 11(d) of the NPPF, the relevant development plan policies should, therefore, be considered out of date and planning permission should be granted unless:

- I. the application of policies in [the NPPF] that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*
- II. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in [the NPPF] taken as a whole.*

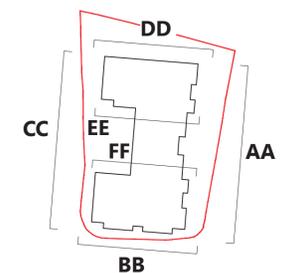
34.2. *This* assessment has been made first against the development plan polices and then against the NPPF, in line with s.70(2) of the Town and Country planning Act 1990 (as amended) and s.38(6) of the Planning and Compulsory Purchase Act 2004 (as amended) which require that applications for planning permission are made in accordance with the provisions of the development plan unless material

considerations indicate otherwise. The NPPF is a material consideration, not a part of the statutory development plan. As there are policies in the development plan that would otherwise not be out of date were it not for the borough's failure to meet the Housing Delivery Test, any assessment of this type of application requires some assessment of the proposal against these development plan policies prior to the application of the presumption in favour of sustainable development.

34.3. The above assessment against the development plan policies has produced the following conclusion:

- The proposed development would result in unacceptable harm to the residential amenity of neighbouring occupiers
- The proposed development would result in the creation of a poor standard of accommodation for some future occupiers.
- In the absence of contributions to the extension of controlling measures to the proposal would result in congestion on surrounding streets.
- Sustainable transport
- The proposed development would negatively impact the preserved trees and result in the unacceptable loss of B category trees harming the verdant appearance of the locality

32.1. For the reasons considered above the while the Council acknowledge the merits of the proposal these have been assessed against the policies of the development plan and other material planning considerations. Officers consider that on balance the adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in [the NPPF] taken as a whole.



Rev	Date	Drawn	Description
1	01.08.20	RSJ	PLANNING ISSUE
2	10.09.20	RSJ	UPDATED PLANNING ISSUE
3	P01 28.07.21	RSJ	UPDATED PLANNING ISSUE

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 - 2 - Buff soldier course brickwork with white/light mortar
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 - 4 - White/light stretcher brickwork with white/light mortar
 - 5 - White/light soldier course brickwork with white/light mortar
 - 6 - White/Light GRC frame
 - 7 - White/Light GRC canopy at ground floor
 - 8 - White/Light Solider course window header
 - 9 - White/Light GRC coping
 - 10 - Powder coated aluminium windows - dark grey/black
 - 11 - Powder coated metal balustrade - dark grey/black
 - 12 - Dark grey/black louvred doors

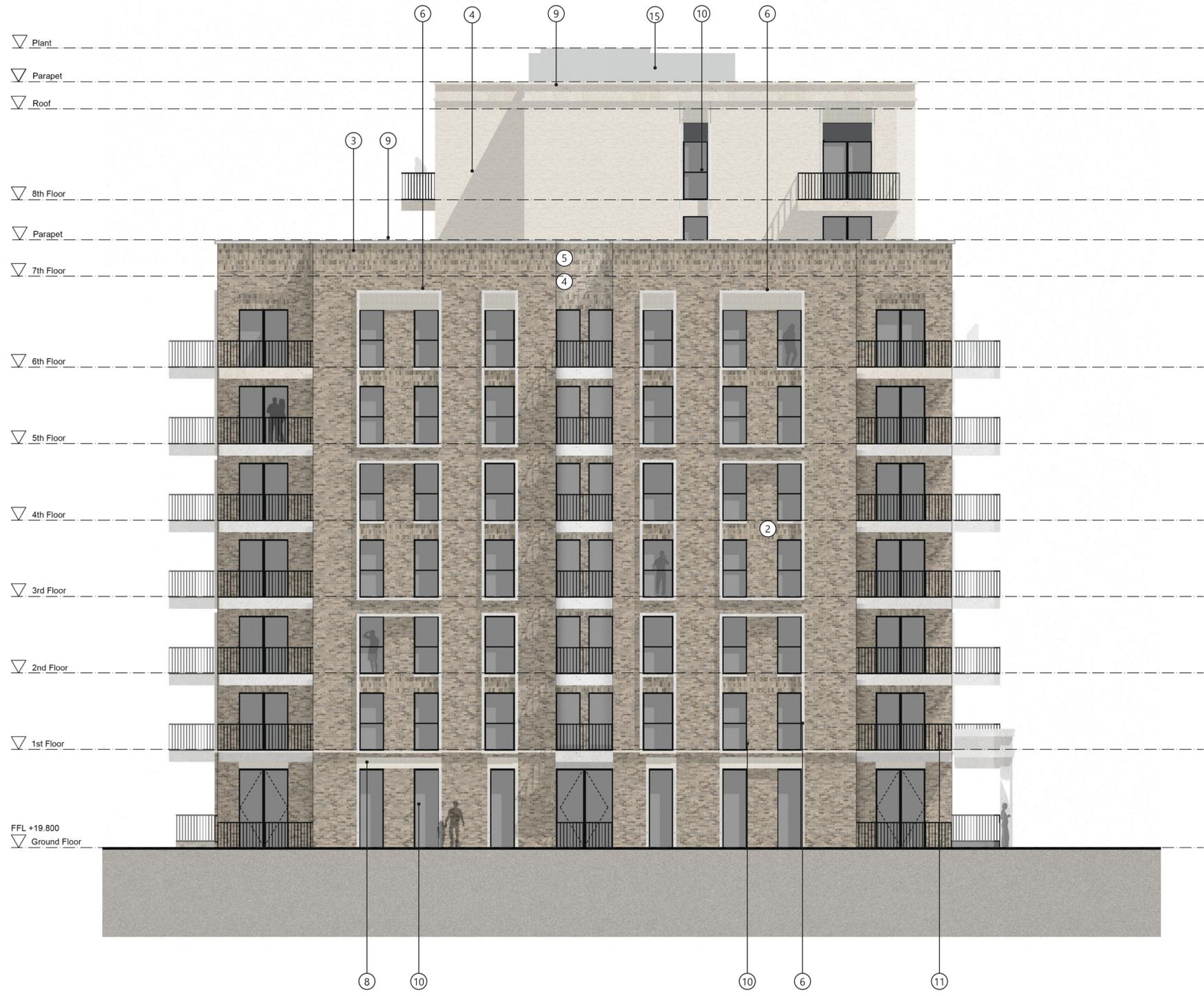
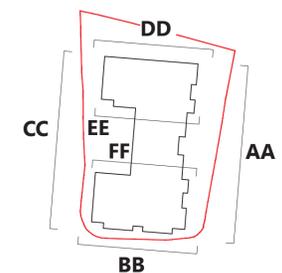
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- 14 - Back-painted glass
- 15 - Plant

East Elevation (AA)
 drawing title
 drawing number: AE250
 client / project: SOCIAL CAPITAL PARTNERS MOORFIELD ROAD
 scale @ A1: 1:100
 status: FOR PLANNING

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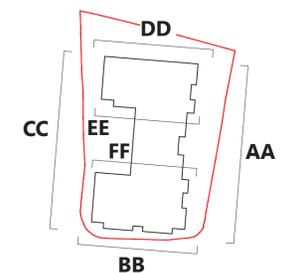
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Legend
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 13 - Dark grey/black metal panel
 14 - Back-painted glass
 15 - Plant

South Elevation (BB)
 drawing title
SOCIAL CAPITAL PARTNERS
 client / project **MOORFIELD ROAD**
AE251
 drawing number
1:100
 scale @ A1
FOR PLANNING
 status
P01
 project number
SHP-MRE
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P01.28.07.21	RSB	UPDATED PLANNING ISSUE	

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- 13 - Dark grey/black metal panel
- 14 - Back-painted glass
- 15 - Plant

West Elevation (CC)

drawing title
 SOCIAL CAPITAL PARTNERS
 MOORFIELD ROAD

FOR PLANNING
 status

AE252
 drawing number

1:100
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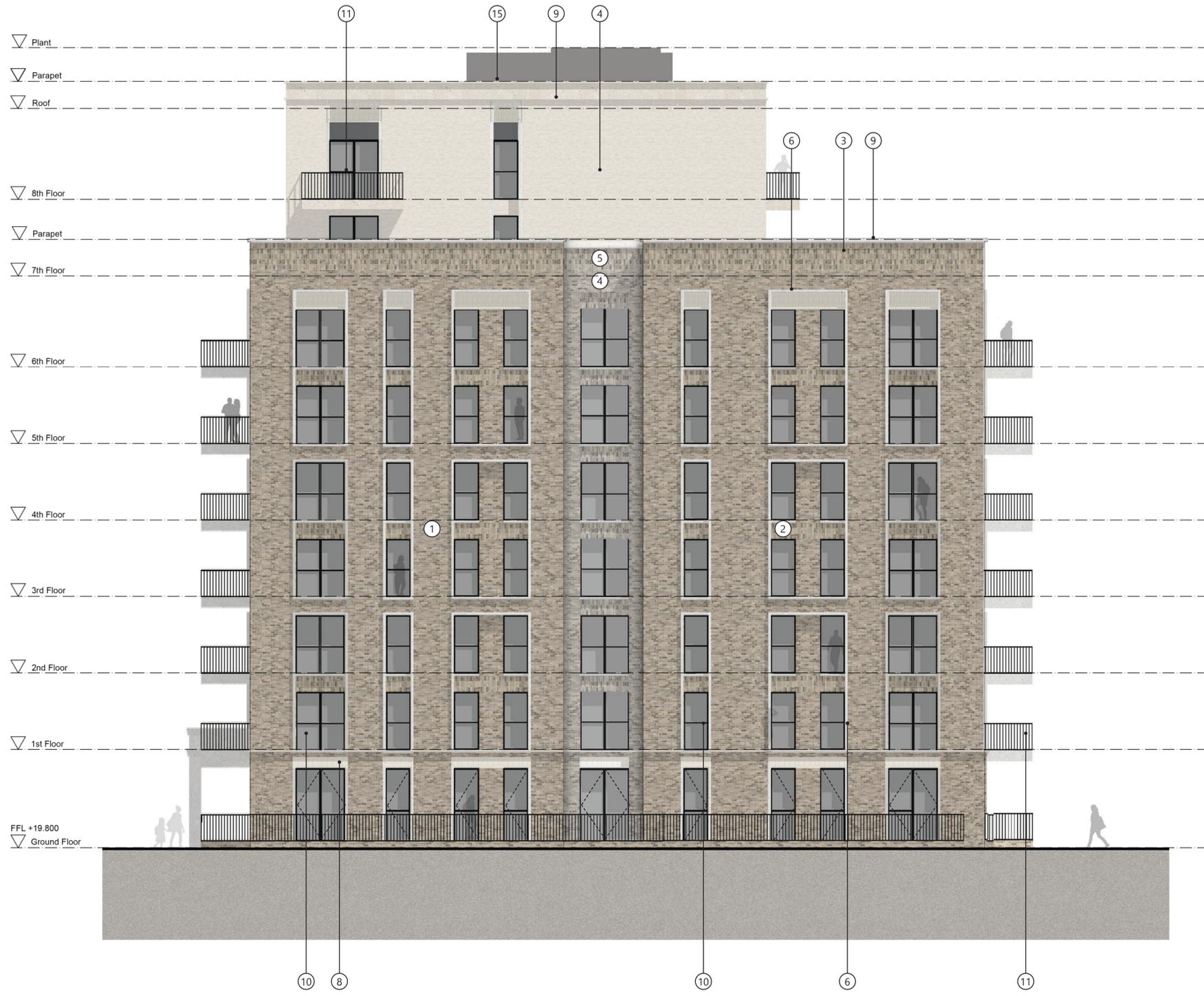
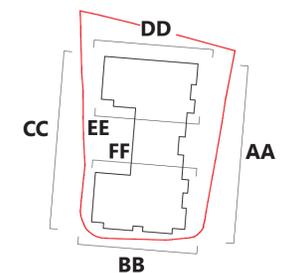
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- 15 - Plant

North Elevation (DD) AE253 P01

client / project SOCIAL CAPITAL PARTNERS MOORFIELD ROAD

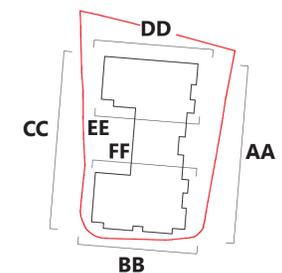
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Courtyard South Elevation(EE) AE254

drawing title: SOCIAL CAPITAL PARTNERS
 drawing number: MOORFIELD ROAD

P01

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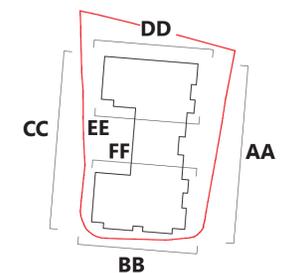
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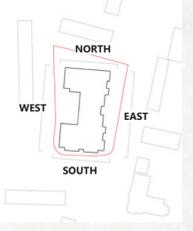
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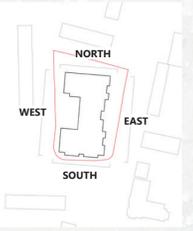
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East



South



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Proposed Long Elevations
 drawing title East & South
SOCIAL CAPITAL PARTNERS
 client / project MOORFIELD ROAD

AE256
 drawing number

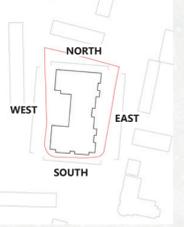
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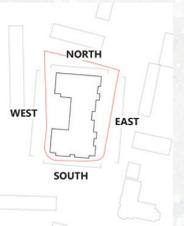
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West



North



Rev Date Drawn Description
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Proposed Long Elevations
 drawing title West + North
SOCIAL CAPITAL PARTNERS
 client / project MOORFIELD ROAD

AE257
 drawing number
 1:200
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P01
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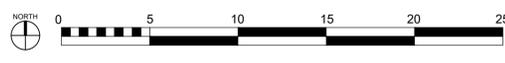


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 P01 10.08.21 RSH UPDATED PLANNING ISSUE
 P01 29.07.21 RSH UPDATED PLANNING ISSUE

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PROPOSED 7TH-8TH FLR		AP07	P01
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