

**LONDON BOROUGH OF ENFIELD**

**PLANNING COMMITTEE**

**Date: 18 July 2023**

**Report of**

Director of Planning &  
Growth - Brett Leahy

**Contact Officers:**

Lap Pan Chong  
Sharon Davidson

**Category**

Major

**Ward**

Ponders End

**Councillor Request**

No

**LOCATION:** Heritage House 345 Southbury Road Enfield EN1 1TW

**APPLICATION NUMBER:** 23/00824/FUL

**PROPOSAL:** Full planning application for the demolition of the existing buildings and redevelopment for a multi-level logistics building (Use Classes E(g)(iii), B2 and B8) capable of subdivision and commercial, business and service buildings (Use Classes E, B2 and B8) including boundary treatment, landscaping, car parking, servicing, public realm and associated works

**Applicant Name & Address:**

c/o Agent  
BL Logistics Investment Limited  
York House  
45 Seymour Street  
London  
W1H 7LX

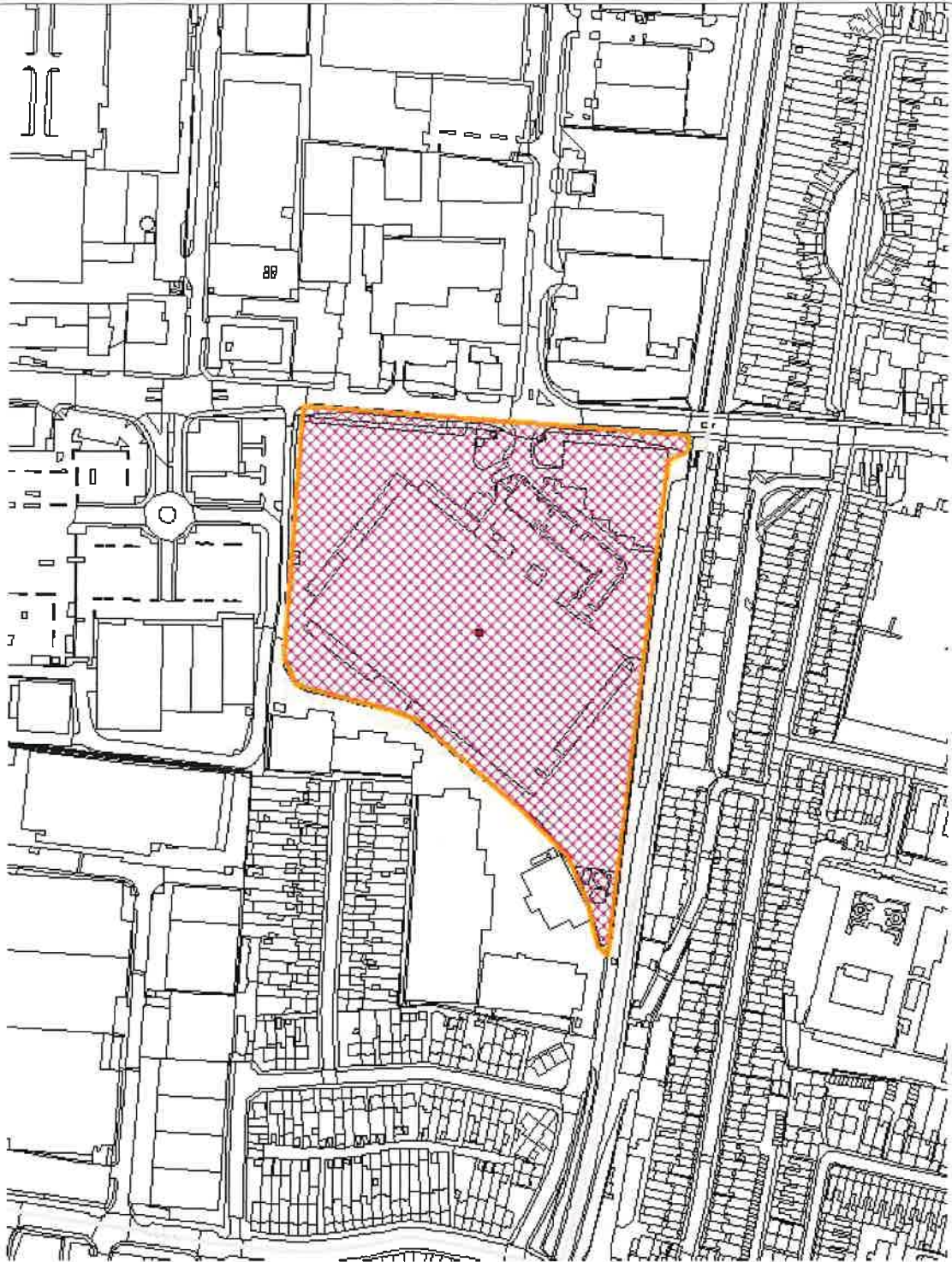
**Agent Name & Address:**

Mr James Sheppard  
CBRE Limited  
Henrietta House  
Henrietta Place  
London  
W1G 0NB

**RECOMMENDATION:**

- 1) That subject to the completion of a Section 106 Agreement to secure the matters covered in this report, the Head of Development Management be authorised to GRANT planning permission subject to conditions
- 2) That the Head of Development Management be granted delegated authority to agree the final wording of the Section 106 Agreement and the conditions to cover the matters in the Recommendation section of this report

Ref: 23/00824/FUL LOCATION: Heritage House, 345 Southbury Road, Enfield, EN1 1TW



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Scale 1:1250

North



## 1. Note for Members

- 1.1 This planning application is categorised as a 'major' planning application involving development carried out on a site having an area of 1 hectare or more. In accordance with the scheme of delegation it is reported to Planning Committee for determination.

## 2. Executive Summary

- 2.2. The proposed development includes a multi-level logistics building and commercial, business and service buildings, which would provide modern, flexible and high-quality employment floorspaces on existing brownfield land within the Great Cambridge Road and Martinbridge Trading Estate, a designated Strategic Industrial Location (SIL). The proposed development is the first industrial/logistics intensification scheme in Enfield.
- 2.3. The primary public benefits of the scheme can be summarised as follows:
- Optimising the site and making effective use of a highly sustainable, highly accessible, brownfield site next to Southbury Station;
  - Providing 42,426 sqm GIA , making a contribution to the Borough's employment floor spaces with a broad range of unit sizes and types including 2 x larger multi-level industrial and logistics units and 5 x smaller commercial units (2,040 sqm GIA)
  - Creating estimated 1,429 (657 direct and 772 indirect) construction jobs and estimated additional 373-386 Full-Time Equivalent (FTE) operational jobs
  - Repairing the streetscape along Southbury Road and contributing towards the delivery of a new public square outside Southbury Station including public art
  - Dedication of land and financial contribution for improving walking and cycling infrastructure in the locality
  - Substantial landscape and biodiversity enhancements including 193 new trees, 718m of native hedgerow, green walls and green roofs, achieving an Urban Greening Factor of 0.22 and Biodiversity Net Gain of 442.65% (area based) and 100% (linear based)
  - A substantial improvement to on-site sustainable urban drainage achieving greenfield run-off rate
- 2.4. Whilst the proposed Main Logistics Building is considered as a 'tall building' within the immediate setting of the Grade II listed 'Ripaults Factory' and Locally Listed Southbury Station, the massing and layout of all the proposed buildings have been sensitively designed particularly through the incorporation of lower C commercial, Business and Service (CBS) buildings fronting Southbury Road and high quality materials and detailed façade treatment of the buildings. The proposed development would also deliver substantial public realm and landscape improvements to Southbury Road including a new station square and new tree-lined frontage. A robust Built Heritage, Townscape and Visual Impact Appraisal has been undertaken to demonstrate no adverse impact on the mid-range and long range views from the heritage assets further afield and from Important Local Views in Enfield. Having taken into account the aforementioned heritage benefits and mitigation, , it is, on balance, considered that the proposed development would not cause harm to the heritage assets and the townscape.
- 2.5. The proposed scheme would result in some adverse and noticeable reductions in daylight to some residential properties on Poppy Drive. However, consideration should be given to the particular design characteristics and internal layouts of these residential

properties, to the fairly minimal existing massing on the Application site, which is unusual in an urban context, and to the SIL designation of the Application Site where industrial intensification is supported by the London Plan 2021. It is also reasonable to consider the identified effects alongside the planning merits of the scheme overall. The proposal would not result in adverse impact on the sunlight and overshadowing to any of the surrounding properties. In conclusion, Officers consider that when balancing the overall minor adverse impact of the scheme in terms of daylight, sunlight and overshadowing with the many planning benefits that the scheme would deliver, the overall balance weighs in favour of the proposal.

- 2.6. Furthermore, it has been recognised that:
- The proposals would not cause any unacceptable adverse impacts to highway safety or the flow of traffic in the locality.
  - The proposals would not result in an unacceptable level of noise and light spill to the residential properties nearby.
  - The proposed development would achieve 'Net Zero' operational carbon primarily through on-site measures (97% reduction above the baseline) and a contribution to a carbon offset fund. The benchmark target for whole life carbon emissions would be met. Construction and operational waste have been minimised. The proposed buildings will achieve a minimum BREEAM 'Excellent' rating.
- 2.7. The development would be appropriate and broadly in accordance with the Development Plan ( London Plan 2021, Core Strategy and Development Management policies) and relevant National Planning Policy Framework 2021 (NPPF) policies.

### **3. Recommendation**

- 3.1. That subject to the completion of a Section 106 Agreement to secure the matters covered in this report, the Head of Development Management be authorised to GRANT planning permission subject to conditions
- 3.2. That delegated authority be granted to the the Head of Development Management to agree the final wording of the Section 106 Agreement and the conditions to cover the matters in the Recommendation section of this report.
- 3.3. Conditions
1. Time limit
  2. Approved plans
  3. Phasing Plan
  4. Completion of CBS units prior to the first occupation of the development
  5. Detailed drawings and sample materials
  6. Arboricultural Methods Statement
  7. Landscape and biodiversity enhancement details (including external lighting, boundary treatments, green roofs, green wall, amenity spaces, public realm and management plan)
  8. Final sustainable drainage strategy
  9. Drainage strategy verification report
  10. Circular economy including compliance to Circular Economy Statement, Excess Materials Exchange and post-construction monitoring report
  11. Heating system details for the CBS buildings
  12. Compliance to Energy Statement and energy performance certificates

13. Compliance to whole life carbon assessment and post-construction monitoring report
14. BREEAM assessment (design stage and post-construction)
15. Final Construction Logistic Plan
16. EV charging details
17. Cycle parking details
18. Final car park management plan
19. Delivery and servicing plan
20. Piling statement
21. Land contamination remediation scheme
22. Plant noise impact assessment
23. CCTV details
24. 'Secured by Design' certification
25. No construction within 5m of water main
26. Full fibre connectivity
27. Tree / shrub Clearance – Nesting Birds
28. Phased clearance – reptiles
29. Compliance to Fire statement
30. Compliance to operational waste strategy
31. Compliance to overheating mitigation measures
32. Compliance to water efficiency measures
33. Compliance to dust control measures
34. Compliance to Outline Construction Environmental Management Plan
35. Compliance to the Health Impact Assessment
36. ECO stars fleet recognition scheme
37. Completion of refuge island and tactile paving in the main access prior to occupation
38. Emissions from non-road mobile machinery
39. Permitted Development Rights to ensure SIL compatible uses in the CBS buildings

#### **4. Site & Surroundings**

- 4.1 The planning application boundary covers an area of 4.67 HA.
- 4.2 The Site is within the Great Cambridge Road and Martinbridge Trading Estate which is a designated Strategic Industrial Location (SIL). The building is currently operating as a distribution centre for Waitrose and Crown Records Management with a large warehouse building and associated offices (approximately GIA of 20,306 sqm) and 315 parking spaces.
- 4.3 The Site is located within the setting of the Grade II Listed Ripaults Factory which is located north of the site on the opposite (northern) side of Southbury Road and the Locally Listed Southbury Station which is located north-east of the Site.
- 4.4 To the east of the Site, there are landscaped banks which are non-statutory designated Wildlife Corridors. On the opposite (eastern) side of the Overground railway line, the neighbouring buildings are predominantly three storey residential properties on Poppy Drive and Emelia Close backing onto the eastern platform.
- 4.5 To the west of the Site, the majority of the buildings are commercial with several retail units.



- 4.6 To the south of the Site, Haslemere Business Centre comprises several logistics buildings which are all of medium height with tall trees screening along with boundaries with the residential properties located on Lincoln Way further south of the Site. Heritage assets further afield were scoped out as they are not affected by the development.
- 4.7 The Site is currently accessed off Southbury Road which runs along the northern edge of the site. The site is approximately 330 metres from the A10, Great Cambridge Road which forms the Transport for London Road Network (TLRN).
- 4.8 The Site is serviced by the London Overground which is adjacent to the north-east part of the Site . There is a bus stop outside of the site located on Southbury Road which services a number of routes. Cycleway 1 is approximately 450 metres to the east of the site. There is also a Cycleway that runs through Enfield Fields approximately 750 metres west of the site. Due to the aforementioned transport connections the site has a Public Transport Access Level (PTAL) of both 3 and 4 on a scale from 0 to 6b where 0 is the lowest and 6b is the highest.



Figure 1: Aerial photo of the site

## 5. Proposal

- 5.1 It is proposed to demolish the existing building and provide a multi-level logistics building (Use Classes E(g)(iii), B2 and B8) over two storeys and separate commercial, business and service buildings (Blocks A-E) (Use Classes E, B2 and B8) with boundary treatment, landscaping, car parking, servicing, public realm and associated works. The summary of the land uses is illustrated in Table 1 below.

Table 1 Proposed Land Uses

Building		Floor	Proposed use	Use Class	GIA (sqm)
Main Logistic Building	Unit 1	Ground Floor	Industrial and logistics uses with	E(g)(iii), B2 and B8	18,165
		Ground Floor Mezzanine			1,916

	Unit 2	First Floor	ancillary offices on mezzanine floors		18,134	
		First Floor Mezzanine				1,916
		Roof plant				255
Sub-total					40,386	
Commercial, Business and Service Buildings	A	Ground Floor	A broad range of employment uses	E, B2 and B8	243	
		Mezzanine			204	
	B	Ground Floor			207	
		Mezzanine			164	
	C	Ground Floor			243	
		Mezzanine			204	
	D	Ground Floor			221	
		Mezzanine			172	
	E	Ground Floor			221	
		Mezzanine			161	
Sub-total					2,040	
Total area					42,426	

#### Main multi-level logistics building

- 5.2 The main multi-level logistics building would accommodate two large logistics units and deliver a total of 42,426 sqm GIA of floorspace at both ground and first floors including 3,832 sqm ancillary offices on mezzanine floors. It will have a maximum height of 29.6m / 51.45 AOD from ground to the core parapet level (roof access cores). Separate entrances are provided for each unit, which are located at the north-east corner of the building.
- 5.3 The existing main vehicular access will be widened with a new refuge island in the middle and tactile paving on each sides of the crossing.
- 5.4 The units will be serviced by their own dedicated service yard which will be located at the rear of building. A ramp is proposed along the western site boundary to serve the first floor service yard.

#### Commercial Business Service Buildings

- 5.1 The Commercial, Business and Service (CBS) buildings with mezzanine floors will accommodate 5 commercial units with a total 2,040 sqm GIA. They will front Southbury Road with a level access from the street. Their heights range from 10.25 m (33.65m AOD) to 8.6m (32.00m AOD). Service/loading bays will be provided at the rear for these proposed CBS buildings.

#### Parking

- 5.2 A total of 145 car parking spaces including 8 car sharing priority spaces and 15 accessible car parking spaces are proposed. The majority of the car parking spaces are located in the rear / southern part of the Site. There will be a 3m wide north-south path connecting the main car park area with the entrances of the buildings. The accessible car parking spaces will be located between the main logistics building and CBS buildings, which will be closer to the entrances.

5.3 A total of 52 van spaces will be provided including 26 spaces near the service yard of the ground floor large logistics unit, and 20 spaces within the main car park and 6 spaces at the rear of CBS Block.

5.4 The proposed development will provide a total of 133 long stay and 60 short stay bicycle parking spaces.

## **6. Environmental Review**

6.1 A request for an Environmental Impact Assessment (EIA) Screening Opinion was made by CBRE on behalf of the Applicant (BL Logistics Investment Limited) in accordance with Part 2, Regulation 6 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. The Council has commissioned an external EIA/Ecology consultant Pell Frischmann to review the screening request and provide advice. Officers agreed that [given the scale and nature of the proposed development, the environmental context of the site and the potential mitigation measures (which will assist in avoiding any significant effects)], the proposed development, when assessed in accordance with the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 and National Planning Practice Guidance, would not result in any unusually complex, significant or potentially hazardous environmental effects. As such it is considered that the proposed development does not require an Environmental Impact Assessment. On this basis, the Council previously issued two formal screening opinions reference 22/03587/SO and 23/00488/SO.

6.2 The Council as a Competent Authority has also commissioned Pell Frischmann to undertake a Habitats Regulations Assessment (HRA) Stage 1 Screening in order to assess the impacts of proposed development on the Epping Forest Special Area of Conservation (SAC). All associated HGV trips from the proposed development are anticipated to travel west from the site, away from Epping Forest SAC. Natural England have reviewed the HRA Screening Report and confirmed it is not necessary to progress to Stage 2: Appropriate Assessment during the EIA screening consultation (ref: 23/00488/SO) . . Following consideration of the information submitted and the response received from Natural England, the Council is satisfied that the proposed development is not likely to have a significant effect on any European site (either alone or in combination with other plans or projects) and that an appropriate assessment is therefore not required.

6.3 On the basis of the assessments undertaken, the proposed development would not give rise to significant effects on the environment subject to appropriate mitigation measures such that it would trigger the requirement for an Environmental Impact Assessment having regard to the above Regulations, National Planning Practice Guidance and relevant case law. Also, as a competent authority, the Council is satisfied that the proposed development is not likely to have a significant effect on any European site. The required mitigation measures will be secured in connection with any grant of planning permission, via the planning conditions or the section 106 obligations. They are detailed in the relevant sections below.

## **7. Consultation**

### Pre-application Consultation



### *Public engagement*

- 7.1 The Applicant presented the proposed development to Cllr Nicki Adeleke, Ponders End Ward Councillor and Cllr Susan Erbil, Cabinet Member for Licensing, Planning & Regulatory Services on 14 November 2022.
- 7.2 The Applicant also sent consultation flyers to local residents and businesses, created a development website, which has and continues to be periodically updated, and has also held a series of community consultation events on 9 and 12 November 2022.
- 7.3 The Statement of Community Engagement report prepared by Concillio has been submitted as part of the application.
- 7.4 The Applicant has provided a summary of the comments received and responses in Table 4 of the submitted Planning Statement. Overall, the principle of development together with the public realm improvement along Southbury Road and the Station are in general supported. Some concerns were raised around the impacts on the neighbouring residents amenity and increase in traffic. To address these concerns, some key changes to the proposed development have been made including reducing the building height of the main logistics building by 3m, relocating the office spaces to the north elevation of the main logistics building to offer more privacy to the neighbours to the east, and enhancing the greenery with additional trees along Southbury Road and the eastern site boundary. The Transportation Team, TFL and National Highways have reviewed the submitted Transport Assessment and confirmed the proposed development would not result in any adverse impacts on the highway networks in the area. The aforementioned matters are further discussed in the 'Neighbouring Residential Amenity' and 'Traffic, Access and Parking' sections of this report.

### *Enfield Place and Design Quality Panel (DRP):*

- 7.5 During the pre-application stage, the proposed development was brought to the Enfield Place and Design Quality Panel (hereby referred to as DRP) on 10 November 2022 and 26 January 2023.
- 7.6 The Panel are satisfied that the proposed scheme has responded positively to the comments made at the first meeting. The Panel considers the proposals integrate the site satisfactorily with its context. The impact of the massing and dominance of vehicles when viewed from Southbury Road are greatly reduced by the introduction of smaller scale units fronting Southbury Road. The boundary treatment to the site in general has been further refined with the consideration of the proposed north-south route and enhancements to soft landscaping along the eastern edge.
- 7.7 Other detailed suggestions from the Panel have been also incorporated in the latest submitted scheme. Where the suggestions are not taken, sound justifications have been provided and are addressed in the report.

### Statutory and Non-Statutory Consultees

#### *External*

7.8 *Barnet Council*: No objection

*Energetik*:

7.9 No objection to the proposal subject to provisions to enable future connection of District Heat Network.

Officer comment: The S106 obligation identified is recommended in the 'S106 Heads of Terms' section below. The matters raised are assessed in the 'Operational Carbon Emissions' section of this report.

7.10 *Enfield Disablement Association*: No comment received.

*GLA*:

7.11 **Land use principles**: The proposed land uses are in line with London Plan requirements and are supported.

**Urban Design and heritage**: The site is not identified as being suitable for a tall building and therefore the application does not comply with Policy D9(B), Notwithstanding this the proposal would not have any unacceptable visual, functional, environmental or cumulative impacts on its surroundings and will not harm the setting or significance of nearby heritage assets. As such a building of the proposed height on this site does not raise any strategic concerns.

**Transport**: With regards to Healthy Streets it is recommended that infrastructure and maintenance improvements are secured by the Council to encourage walking and ensure pedestrian safety. Conditions may be necessary to protect the adjacent railway infrastructure. The quantum of staff parking should be reviewed. Management plans need to be secured.

**Environment and Sustainability**: Subject to securing appropriate energy and WLC conditions along with mitigation measures for air-quality and flood risk, the proposal is not expected to result in strategically significant issues regarding environment and sustainability

**Conclusion**: As the proposal raises no strategic planning issues, in this instance, there is no need for it to be referred back to the Mayor

Officer comment: The GLA comments have informed revisions to the Energy Statement, Whole Carbon Assessment, Circular Economy Statement and Fire Statement. The conditions identified in relation to energy, WLC, air quality, flood risk, and car parking management plan are recommended in the 'Recommendation' section above. Furthermore, the walking and cycling infrastructure improvements identified will be secured by a S106 obligation as stated in the 'S106 Heads of Terms' section below.

7.12 *Hertsmere Borough Council*: No objection

7.13 *Haringey Council*: No comment received.

*Historic England (GLAAS)*:

7.14 No objection. The proposal is unlikely to have a significant effect on heritage assets of archaeological interest and no further assessment or conditions are therefore necessary.

7.15 *Historic England*: No comment received.

7.16 *Lee Valley Regional Park Authority*: No comment received.

7.17 *London Fire Brigade*: London Fire Brigade did not comment

*Metropolitan Police (Secured by Design)*:

7.18 No objection subject to a final 'Secured by Design' certification, declaration of conformity of the proposed lighting details to BS 5489-1:2013/2020 and CCTV details.

Officer comment: The condition identified is recommended in the 'Recommendation' section above. The matters raised are assessed in the 'Secure by Design' section of this report.

*National Highway*:

7.19 Satisfied that the proposal would not materially affect the safety, reliability, and/or operation of the strategic road network (SRN) (i.e. M25 J25)

7.20 *Natural England*: No comment received during the consultation of this application. During the EIA screening consultation (ref: 23/00488/SO), Natural England reviewed the HRA Screening Report prepared by the Council as a Competent Authority and confirmed it is not necessary to progress to Stage 2: Appropriate Assessment

*Network Rail*:

7.21 The ownership of the land for the proposed public realm work needs to be clarified. The Applicant should continue to engage with Network Rail's Asset Protection Team. Network Rail would welcome further discussion with the Applicant, Enfield Council and TfL to further improve the public realm between the proposed development and Southbury Station.

Officer comment: Based on the Council's internal GIS map, it appears that the concerned land is adopted highways. The matters raised are assessed in the 'Healthy Street/ Active Travel' section of this report.

7.22 *Ponders End Community Development Trust*: No comment received.

7.23 *Poppy Drive Residents Association* : No comment received.

*Thames Water Authority*:

7.24 No objection to foul water capacity nor surface water drainage strategy subject to compliance to drainage hierarchy and an informative about effective use of petrol / oil interceptors in all car parking/washing/repair facilities. A condition is recommended to request information about diversion of the strategic water main in case of any construction works within 5m of the water main.

Officer comment: The conditions identified are recommended in the 'Recommendation' section above. The matters raised are assessed in the 'Flood Risk and Drainage' section of this report.

7.25 *UK Power Networks:* No comment received.

*Internal*

7.26 *Building Control:* No objection to the submitted Fire Statement.

*Climate Action and Sustainability:*

7.27 No objection subject to conditions to increase re-use of the materials through the use of Excess Materials Exchange, post construction evidence of compliance with energy statement and S106 obligation for the carbon offset fund contribution.

Officer comment: The conditions identified are recommended in the 'Recommendation' section above and a S106 obligation is recommended in the 'S106 Heads of Terms' section below. The matters raised are assessed in the 'Sustainable Design and Construction' section of this report.

*Heritage*

7.28 No objection subject to conditions. The proposal brings heritage benefits and an enhancement to the present condition of the setting of the Grade II listed Ripaults Factory and Locally Listed Southbury Station. Officers considered the smaller detached units at the front of the site will help to better define the streetscape whilst also providing a degree of screening for the larger massing together with a generous hard and soft landscaping scheme to Southbury Road and public art.

7.29 The Heritage Team recommended conditions for further details concerning the materials, landscaping and S106 obligation for public arts strategy. A compliance condition is also recommended to ensure the CBS buildings are completed prior to the Main Logistics Unit.

Officer comment: The conditions identified are recommended in the 'Recommendation' section above and a S106 obligation is recommended in the 'S106 Heads of Terms' section below. The matters raised are assessed in the 'Heritage, Townscape and Archaeology' section of this report.

*Economic Development:*

7.30 No objection subject to employment and skill strategy to be secured via S106.

Officer comment: The S106 obligation identified is recommended in the 'S106 Heads of Terms' section below.

*Environmental Health:*

7.31 No objection subject to conditions for piling method statement, acoustic report on future mechanical plants, revised details of the boundary treatment on the first floor service yard, land contamination mitigation scheme, compliance to GLA's supplementary planning guidance "Control of Dust and Emissions During Construction and

Demolition" and implementation of mitigation measures stated in the submitted Air Quality Assessment.

Officer comment: The conditions identified are recommended in the 'Recommendation' section above. The matters raised are assessed in the 'Noise', 'Light spill', 'Air Quality' and 'Land Contamination' sections of this report.

*Journeys and Places:*

- 7.32 Transportation Officers do not object to the application subject to Travel Plan monitoring and the Active Travel financial contributions.

Officer comment: The S106 obligations identified are recommended in the 'S106 Heads of Terms' section below. The matters raised are assessed in the 'Traffic, Access nad Parking' section of this report.

*Sustainable Drainage:*

- 7.33 No objection subject to a condition to secure the final design and drainage verification report.

Officer comment: The conditions identified are recommended in the 'Recommendation' section above. The matters raised are assessed in the 'Flood Risk and Drainage' section of this report.

*Trees:*

- 7.34 The Street Tree Officer raises no objection to the application subject to an Arboricultural Method Statement and Tree Protection Plan.

Officer comment: The conditions identified are recommended in the 'Recommendation' section above. The matters raised are assessed in the 'Tree' section of this report.

Public

- 6.1 Consultation letters were sent to 985 surrounding properties on 24.03.2023
- 6.2 Site notices were put up on 03.04.2023. and the application was advertised in the local press on 29.03.2023
- 6.3 Two objections to this application were received. A summary of the comments received, and officers' responses are as follows:

Summary of responses

- Noise nuisance during construction
- No information about the planned hours or timescales of work
- Dust and debris during construction
- Lighting pollution
- Loss of outlook from Nos 57 and 60 Poppy Drive

- Loss of light to Nos 57 and 60 Poppy Drive

Officers' response

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

Summary of responses

- No benefits to local residents and community
- Insufficient public consultation

Officers' response

The benefits have been set out in the executive summary of this report. The scheme has been revised several times, and has informed discussions with additional information provided in light of the concerns raised during the public consultation during pre-application.

Summary of responses

- Impact on property values

Officers' response

Impact on property value is not a material planning consideration.

## 8. Relevant Planning History

### Application Site

- 8.1 TP/94/0619 Redevelopment of site by the erection of warehouse building with ancillary office accommodation, together with provision of service yards, lorry parking and associated car parking spaces. Granted with condition – 10.11.1994

### Adjacent Sites

- 8.2 Colosseum Retail Park, Dearsley Road, Enfield EN1 3FD  
20/00788/OUT Hybrid Planning Application for the phased demolition of all existing buildings and structures, site preparation works and the comprehensive residential-led mixed use redevelopment of Colosseum Retail Park comprising: Detailed planning application for the construction of four buildings comprising residential dwellings (Use Class C3), flexible commercial floorspace including a Work Hub (Use Classes A1, A2, A3, A4, B1, D1 and/or D2), ancillary car/cycle parking, amenity, plant, all other associated public, communal and private realm, soft/hard landscaping, infrastructure, access and highway works, and any temporary landscaping, parking and access arrangements;

Outline planning application (with all matters reserved) for the construction of six development plots comprising residential floorspace (Use Class C3) including any ancillary internal parking, amenity, and plant; flexible commercial floorspace (Use Class A1, A2, A3, A4, B1, D1 and D2), and all other associated public, communal and private realm, soft/hard landscaping, infrastructure and highway works, access and a new internal road network **Granted with conditions and S106** – 30.07.2021



- 8.3 Lee House, Baird Road, Enfield, EN1 1SJ  
21/04573/FUL Full planning application was granted for redevelopment of an existing office into 4,738m<sup>2</sup> of flexible industrial/ logistics floorspace **Granted with conditions and S106**
- 8.4 Hereward House, 288 Southbury Road, Enfield, EN1 1TR  
22/03175/OUT Outline planning application for redevelopment to 7 storeys of residential block with first and ground floor commercial uses was submitted in September 2022. **Under consideration.**



Figure 2: Surrounding developments

(A: Colosseum Retail Park; B: Lee House, Baird Road C: 288 Southbury Road)

## 9. Relevant Planning Policies

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

### National Planning Policy Framework 2021

- 9.2 The National Planning Policy Framework (NPPF) introduces a presumption in favour of sustainable development. In this respect, sustainable development is identified as having three dimensions - an economic role, a social role and an environmental role. For decision taking, this presumption in favour of sustainable development means:

a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;

b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and

c) an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

9.3 The NPPF recognises that planning law requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise. The NPPF does not change the statutory status of the development plan as the starting point for decision making.

9.4 In relation to achieving appropriate densities Paragraph 124 of the NPPF notes that planning policies and decisions should support development that makes efficient use of land, whilst taking into account:

a) the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;

b) local market conditions and viability;

c) the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;

d) the desirability of maintaining an area's prevailing character and setting (including residential gardens), or of promoting regeneration and change; and

e) the importance of securing well-designed, attractive and healthy places.

9.5 Paragraph 48 of the NPPF details when weight may be given to relevant emerging plans. This guidance states that the stage of preparation, the extent to which there are unresolved objections and the degree of consistency of relevant policies to the Framework are relevant.

#### The London Plan 2021

9.6 The London Plan with Enfield's Local Plan forms the Development Plan for this application. It is the overall strategic plan for London setting out an integrated economic, environmental, transport and social Framework for the development of London for the next 20-25 years. The following policies of the London Plan are considered particularly relevant:

GG1 – Building Strong and Inclusive Communities

- GG2 – Making the Best Use of Land
- GG3 – Creating a Healthy City
- D3 – Optimising Site Capacity through the Design-Led Approach
- D4 – Delivering Good Design
- D5 – Inclusive Design
- D11 – Safety, Security and Resilience to Emergency
- D12 – Fire Safety
- D14 – Noise
- E4 – Land for industry, logistics and services to support London’s economic function
- E5 – Strategic Industrial Locations (SIL)
- E7 – Industrial intensification, co-location and substitution
- G6 – Biodiversity and Access to Nature
- G7 – Trees and Woodland
- SI1 – Improving Air Quality
- SI2 – Minimising Greenhouse Gas Emissions
- SI5 – Water Infrastructure
- SI12 – Flood Risk Management
- SI13 – Sustainable Drainage
- T1 – Strategic approach to transport
- T2 – Healthy Streets
- T3 – Transport capacity, connectivity and safeguarding
- T5 – Cycling
- T6 – Car Parking
- T7 – Deliveries, Servicing and Construction

Local Plan - Overview

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

Core Strategy

- 9.8 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. The following policies within the Core Strategy are considered particularly relevant:

- CP9: Supporting community cohesion
- CP13: Promoting economic prosperity
- CP14: Safeguarding strategic industrial locations
- CP20: Sustainable energy use and energy infrastructure
- CP21: Delivering sustainable water supply, drainage and sewerage infrastructure
- CP22: Delivering sustainable waste management
- CP24: The road network

CP25:	Pedestrians and cyclists
CP26:	Public transport
CP28:	Managing flood risk through development
CP30:	Maintaining and improving the quality of the built and open environment
CP31:	Built and landscape heritage
CP32:	Pollution
CP36:	Biodiversity
CP46:	Infrastructure contributions

#### Development Management Document

9.9 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.

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

DMD19	Strategic Industrial Locations
DMD23	New Employment Development
DMD37	Achieving High Quality Design-Led Development
DMD38	Design Process
DMD39	The Design of Business Premises
DMD45	Parking Standards
DMD47	New Roads, Access and Servicing
DMD48	Transport Assessments
DMD49	Sustainable Design and Construction Statements
DMD50	Environmental Assessment Methods
DMD51	Energy Efficiency Standards
DMD53	Low and Zero Carbon Technology
DMD55	Use of Roof Space / Vertical Surfaces
DMD58	Water Efficiency
DMD59	Avoiding and Reducing Flood Risk
DMD60	Assessing Flood Risk
DMD61	Managing Surface Water
DMD64	Pollution Control and Assessment
DMD65	Air Quality
DMD68	Noise
DMD69	Light Pollution
DMD70	Water Quality
DMD76	Wildlife Corridor
DMD79	Ecological Enhancements
DMD80	Trees on Development Sites
DMD81	Landscaping

#### Other Material Considerations

National Planning Practice Guidance  
 Mayor of London Housing SPG (Adopted March 2016)  
 LBE S106 SPD 2016  
 TfL London Cycle Design Standards (2014)  
 Energy Planning Guidance (2021)  
 Be Seen Energy Monitoring LPG (2021)

Draft Fire Safety LPG (2022)  
Whole Life Carbon LPG (2022)  
Circular Economy Statements LPG (2022)  
Urban Greening Factor LPG (2023)  
Air quality positive LPG (2023)  
Air quality neutral LPG (2023)

Enfield S106 Supplementary Planning Document (Adopted November 2016)  
Enfield Decentralised Energy Network Technical Specification SPD (2015)  
North East Enfield Area Action Plan (Adopted June 2016)  
Blue and Green Strategy (2021 - 2031) June 2021

Enfield Local Plan (Reg 18) 2021 (DNELP)

- 9.11 Enfield Local Plan - Reg 18 Preferred Approach was approved for consultation on 9th June 2021. The Reg 18 document sets out the Council's preferred policy approach together with draft development proposals for several sites. As the emerging Enfield Local Plan progresses through the plan-making process the draft policies within it will gain increasing weight but at this stage it has relatively little weight in the decision-making process.
- 9.12 The Local Plan remains the statutory development plan for Enfield until such stage as the replacement plan is adopted and as such applications should continue to be determined in accordance with the Local Plan, while noting that account needs to be taken of emerging policies and draft site proposals.

**10. Analysis**

- 10.1. This report sets out the analysis of the issues that arise from the proposal when assessed against the development plan and the NPPF
- 10.2. This application has been subject to extensive negotiation to address the concerns raised by officers and local residents through the consultation process.
- 10.3. The main considerations of the development are the following:
- Principle of Development
  - Socio-economic considerations
  - Character and Design
  - Heritage, Townscape and Archaeology
  - Neighbouring Residential Amenity
  - Flood Risk and Drainage
  - Biodiversity, Trees and Landscaping
  - Traffic, Access and Parking
  - Sustainable Design and Construction
  - Fire Safety
  - Air Quality
  - Land Contamination
  - Health Impact Assessment
  - Digital Connectivity

Principle of Development

- 10.4. DMD19(2)(B) of the adopted Local Plan requires 'no significant net loss of industrial capacity' within SILs. Strategic Policy SP E3 of the DNELP place an even stronger

protection to SIL and requires 'no net loss' of light and general industrial, storage and distribution, research and development and related sui generis floorspace in SILs.

- 10.5. London Plan Policy E5 states that development proposals in SILs should be supported where the uses proposed fall within the industrial-type activities set out in Part A of Policy E4 and both Policies E5 and E7 state that development proposals within or adjacent to SILs should not compromise the integrity or effectiveness of these locations in accommodating industrial-type activities and their ability to operate on a 24-hour basis.
- 10.6. Policy E7 of London Plan encourages the intensification of business uses in Use Classes B1c (now class E(g)(ii) and/or (iii)), B2 and B8 occupying *all categories of industrial land through:*
- 1) *introduction of small units*
  - 2) *development of multi-storey schemes*
  - 3) *addition of basements*
  - 4) *more efficient use of land through higher plot ratios having regard to operational yard space requirements (including servicing) and mitigating impacts on the transport network where necessary*
- 10.7. Whilst the LPA is currently in the final stages of a new Employment Land Review, the data underpinning the extant 2018 Employment Land Review indicates a need of 251,505 sqm of industrial and logistics floorspace up to 2039. The submitted Market Demand / Supply Assessment (as part the Planning Statement [submitted with the application] ) demonstrates that there has been lack of supply of industrial / logistics buildings in the North London market since 2017 despite the sustained and continuous increase in demand over the past 5-year period.

*Main logistics Building*

- 10.8. The site is designated as part of a Strategic Industrial Location (SIL). Officers and GLA have confirmed that the net gain in 16,248 m<sup>2</sup> GIA of E(g)(ii)/(iii), B2 and/or B8 units within the designated SIL is strongly supported.
- 10.9. The proposal includes a flexible multi-storey, large floorplate industrial unit which has been designed to cater for major industrial/logistics occupiers, creating a new regional distribution centre in direct response to market demand. Officers are satisfied that the proposal has been designed with sufficient layout and structural flexibility with the ability for subdivision to changing market demand in the future. This has also been confirmed by the Design Review Panel.

*Commercial, Business and Service Buildings*

- 10.10. Policy E2D of London Plan states that '*Development proposals for new B Use Class business floorspace greater than 2,500 sq. m. ... should consider the scope to provide a proportion of flexible workspace or smaller units suitable for micro, small and medium-sized enterprises.*'
- 10.11. In a similar vein, DMD24 indicates that '*the provision of small business units will be sought as part of proposals for the redevelopment of an existing employment-generating site and as part of mixed-use schemes, in appropriate locations.*'
- 10.12. After pre-application discussions with officers, the proposal also includes five units which will deliver 2,040 sq. of employment floor space within the Commercial, business



and Service (CBS) Buildings which will meet with the objectives of this part of Policy E2 of the London Plan.

- 10.13. The CBS buildings will have a wider range of uses (Use Classes E, B2 and B8) to allow flexibility in response to market demand. As stated in Policy 21 of the DMD (2014), small scale walk-to services such as a workplace crèche or café which meet the essential day to day needs of the industrial occupiers will generally be permitted, provided that the proposed use is necessary to support industrial activity and it would not adversely affect the industrial status or operation of the area. Hence, it is considered the proposed Class E uses could help support the support the industrial / logistics uses in the area subject to an overall appropriate level of this type of use within the CBS buildings, which would be secured via a condition. Furthermore, use class E has a broad range of uses which include SIL non-compatible uses such as a creche, day nursery or day centre (Use Class E(f)). These uses would not sit comfortably alongside the industrial-type activities without careful design and sufficient mitigation due to the traffic, noise and air quality associated with the industrial and logistics uses within SIL. Hence, approval from the LPA would be required to use the CBS buildings for class E(f) uses. Considering the above, a condition has therefore been recommended to restrict the permitted development rights of these CBS buildings to ensure a balanced mix of Classes E, B2 and B8 uses and restrict non-SIL compatible uses in order to safeguard the integrity and effectiveness of the Great Cambridge Road and Martinbridge Trading Estate in accommodating industrial-type activities and their ability to operate on a 24-hour basis in accordance with Policies E5 and E7 of London Plan .
- 10.14. The proposal would provide a significant uplift of employment floor space with diverse unit sizes within the SIL, which would help meet the identified need for industrial and logistics floorspace. As such, it is considered that the principle of the proposed development is strongly supported, and specifically complies with the NPPF ), Policies E4, E5 and E7 of the London Plan , Policies 13 and 14 of Enfield's Core Strategy (2013) and Policy 19 of DMD (2014).

#### Socio-economic considerations

- 10.15. Policy CG5 of the London Plan seeks to ensure that the benefits of economic success are shared more equally across London. Policy E11 makes clear that development should support employment, skills development, apprenticeships and other education and training opportunities in both the construction and end use phases.
- 10.16. The submitted Economic Benefits Statement estimates that the proposed development would support 657 direct jobs and 772 indirect jobs during the construction phase, which would generate a total of £158.7m in economic output (GVA) over the construction phase. It is estimated that the proposed development would support approximately net 373-386 additional direct and indirect FTE jobs. It is also estimated that the proposed development could generate approximately a net increase in £0.8m per annum in business rates.
- 10.17. The Applicant would be required to use all reasonable endeavours to secure the use of Local Labour as 25% of the overall labour engaged in the demolition and construction phase, and to secure the use of Local Goods and Materials to the value of a minimum of 10% of the overall spend on construction of the Development, in accordance with the Enfield S106 SPD (2016). At the time of writing this report, officers are having ongoing discussions with the Applicant to confirm the number of

apprenticeships. An Employment & Skills Strategy (E&SS) and monitoring of the implementation of the E&SS would be secured by a S106 obligation.

#### Character and Design

- 10.18. Paragraph 126 of the NPPF underscores the central value of good design to sustainable development. The Framework expects the planning process to facilitate “high quality, beautiful and sustainable buildings and places”. As in Paragraph 130, the assessment of a scheme should take into account the endurance of the design, visual appeal, sensitivity to local context, sense of place, optimisation of the site and contribution to health and wellbeing.
- 10.19. London Plan Policy D4 encourages the use of master plans and design codes to ensure the delivery of high-quality design and place-making. Design scrutiny, through the use of Design Review Panels is encouraged.
- 10.20. Enfield Policy DMD 37 sets out objectives for achieving good urban design: character; continuity and enclosure; quality of public realm; ease of movement; legibility; adaptability and durability; and diversity.

#### *Tall Building and Massing*

- 10.21. Enfield Policy DMD 43 states:

*1. Tall buildings will not be acceptable in areas classified as inappropriate.*

*Areas inappropriate for tall buildings include those:*

- a. within and adjacent to the Green Belt;*
- b. within the boundary or in the immediate vicinity of, or along views to, or from:*
  - Conservation areas;*
  - Nationally or locally listed buildings;*
  - Scheduled or locally listed ancient monuments; and*
  - Nationally or locally registered historic parks and gardens.*

- 10.22. Paragraph 6.4.1 of the supporting text of DMD 43 defines tall and large buildings as those that are substantially taller than their surroundings, cause a significant change to the skyline or are larger than the threshold sizes set for the referral of planning applications to the Mayor.
- 10.23. Policy D9 of the London Plan relates to tall buildings, stating that boroughs should determine if there are locations where tall buildings may be appropriate. The height of tall buildings will vary but should not be less than 6/7 storeys (or 18 metres to the floor level of the uppermost storey). Policy D9(B) states that tall buildings should only be developed in locations that are so identified. Enfield Policy DMD 43 does not identify any locations where tall buildings would be appropriate so it is not currently possible to comply with London Plan Policy D9(B) anywhere in Enfield – until a new Local Plan is adopted. Recent case law has established that development can still be considered against policies D9 (C) and (D) even if Part B of Policy D9 cannot be complied with. London Borough of Hillingdon R (On the Application Of v Mayor of London [2021] EWHC 3387 (Admin) . It is therefore considered that it is appropriate to consider tall building proposals in the context of limbs D9(C)(2)(3) and (4) of London Plan Policy D9.

10.24. Policy DE6 of the emerging Enfield Local Plan outlines that the principle of tall buildings will be supported in appropriate locations and that different definitions of “tall buildings” are used throughout the Borough to reflect local context. Figure 7.4 within Policy DE6 identifies areas where tall buildings could be acceptable (subject to compliance with outlined criteria).

- *Tall Building within the Setting of Heritage Assets*

10.25. The proposed Main Logistics Building will have a maximum height of 29.6m and will be substantially taller than its surroundings. Hence, it falls within the definition of a ‘tall building’ in accordance with London Plan and Enfield Local Plan policies.

10.26. The Site is located within the setting of the Grade II Listed Ripaults Factory which is located north of the site on the opposite (northern) side of Southbury Road and Locally Listed Southbury Station which is located north-east of the Site.

10.27. Under the current adopted Enfield Local Plan policy, the proposed Main Logistics Building is located within an inappropriate area. However, the Council’s Emerging Local Plan acknowledges the need to ‘exhaust all reasonable opportunities on brownfield land, making underused land work harder and optimising densities’ which remains a ‘first principle’ of the document (paragraph 2.4.1). Although not adopted as policy and having limited weight, the Application Site is identified within a suitable location for tall buildings with a maximum height of 48m as set out within Figure 7.4 of the emerging Enfield Local Plan, being located within a 10-minute walk (or 800m radius) of Southbury Station.

10.28. The surrounding heritage assets have informed the layout and massing of the proposed development at an early stage of the planning process. Substantial improvements to the public realm along the Southbury Road frontage are proposed through new trees, a public square outside the Station and active frontages of the CBS buildings, which would improve the setting of the heritage assets. The Conservation Officers have confirmed that the proposed development would not result in harm subject to high quality building, landscape and public realm design to meet Policy D9 of London Plan (See the detailed analysis in ‘Heritage, Townscape and Archaeology’ section)

10.29. While the proposal is not considered to strictly accord with DMD43, as noted above, there is currently a conflict between the out-of-date blanket presumption against tall buildings policy approach taken by DMD43 of the Local Plan and the approach taken by London Plan Policy D9 – requiring that Councils identify appropriate locations for tall buildings and then assess their impacts as set out above. For the purposes of LPD9, a proposal can be in a location which is outside those areas identified as appropriate for tall buildings but be acceptable when its impacts are assessed under part C of this policy. As part of an overall assessment, it is appropriate to consider the proposal against the criteria in parts (C) and (D) of the policy. Part (C)(1) specifically relates to visual impacts, including long-range, mid-range and immediate views, considered above.

- *Assessment against London Plan Policy D9*

10.30. The design of the buildings has been considered in line with the requirements and guidance of Policy D9 of the London Plan and supporting text, and the criteria set out in Policy DM 43 of the Local Plan. The below provides an analysis of the proposed

development against the requirements of Policy D9(C) of the London Plan, namely visual, functional, environmental and cumulative impacts.

- Visual impacts

- 10.31. Given the overall mass and scale of the Main Logistics building, it will be visible from some distance. Although visible, the proposed tall building would be consistent with the overall industrial character of the SIL and as such Officers are of the opinion that its appearance will not be out of character with its surrounds. The applicant has reduced the mass of the tall building by reducing the height by 3m and omitting the pedestrian link at first floor, and maximised the buildings setback from the eastern boundary to minimise bulk that will be visible from residential properties to the east. The inclusion of the two smaller CBS blocks and new tree planting fronting Southbury Road will introduce a more human scale frontage that will significantly reduce the impact of the large logistic building on the street scene.
- 10.32. The proposed building heights would also reinforce the building height hierarchy set out in the emerging Local Plan. The maximum height of Main Logistics Building is substantially lower than that of the approved tall buildings ranging from 126.000 m AOD. to 50.100 m AOD in the consented residential-led mixed used redevelopment at Colosseum Retail Park which is 100m north-west of the Site (ref: 20/00788/OUT).
- 10.33. The visual impact of the tall building therefore is not expected to raise any significant issues including visual impacts upon nearby heritage assets which have been discussed further within the 'Heritage, Townscape and Archaeology' section of this report. Also, the submitted External Lighting Assessment has demonstrated that the proposed external lighting would not result in significant impacts on the residential properties nearby. This has been discussed further within 'Neighbouring Residential Amenity' section.

- Functional impacts

- 10.34. The layout and proposed uses make an efficient use of the Site and will deliver floorspace that is demanded within both the SIL and the wider London area. The layout of the tall buildings is logical and will allow operations on the site to function efficiently. The fire safety, delivery and servicing and effect on solar energy generation on adjoining buildings are considered acceptable and discussed further in the 'Fire Safety', 'Traffic, Access and Parking' and "Neighbouring Residential Amenity' sections below.

- Environmental impacts

- 10.35. The applicant has incorporated a number of initiatives to ensure the scheme will enhance biodiversity and urban greening on the site (See also 'Biodiversity, Trees and Landscaping' section).
- 10.36. Despite some adverse and noticeable impacts on the daylight to some residential properties on Poppy Drive, the proposed building would not result in an adverse impact on sunlight, overshadowing and noise to them. Officers consider it is reasonable to consider the impacts on daylight within the context of SIL designation and the wider benefits delivered by the scheme. This matter has been further discussed within the 'Neighbouring Residential Amenity' section.

10.37. Based on the independent EIA screening opinion commissioned by the Council, the proposed development is not considered to have the potential to alter wind microclimate with reference to Lawson Comfort Criteria which is the most widely used standard to assess wind impacts on pedestrian safety and comfort.

- Cumulative impacts

10.38. The proposed building heights are considered to be responsive and appropriate to the changing character and scale of the local area within the designated SIL.



Figure 3: CGI of the proposed development (viewed from Southbury Road)

- Overall

10.39. Officers acknowledge that the proposed tall building is located within the setting of the surrounding heritage assets, contrary to DMD 43. However, the impact on the heritage assets have been sufficiently mitigated by the introduction of detached lower CBS buildings along Southbury Road together with proposed landscape and public realm improvements along Southbury Road, which would improve the setting of the Heritage assets (See also Heritage Townscape and Archaeology section). Officers have also assessed the visual, functional, environmental and cumulative impacts of the scheme and are of the view that the proposed development would be acceptable in accordance with London Plan D9(C)(D).

10.40. The Urban Design, Conservation and GLA Officers have no objection to the proposed height and massing. The DRP are also satisfied with the proposed design and layout. It is therefore considered that the proposal would accord with LP21 Policy GG2, which seeks to make the best use of land, including through enabling the development of brownfield land. The proposed industrial intensification within designated SIL is strongly supported which would create much needed employment floor space and jobs. Policy D3 seeks to optimise site capacity through a design-led approach. This includes enhancing local context by delivering buildings and spaces that positively respond to local distinctiveness, enhancing heritage assets and being of high architectural quality. For the reasons assessed above, Officers consider that the proposed development would optimise site capacity through a design-led approach – and would accord with Policy D3.

- 10.41. The proposal is assessed as being in accordance with LP policies GG2 and D9(C) and (D). In such cases where there is a conflict in policy approach, Section 38 (5) of the Planning and Compulsory Purchase Act 2004 states “if to any extent a policy contained in a development plan for an area conflicts with another policy in the development plan the conflict must be resolved in favour of the policy which is contained in the last document to become part of the development plan”.
- 10.42. On this basis, it is considered that limited weight should be applied to DMD43 of the Local Plan and precedence should be given to Policy D9 of the London Plan in assessing the appropriateness of tall buildings on the application site. Given the out-of-date policies of the Council’s Local Plan (in particular, Policy DMD 43 as referenced above) and the limited weight attributed to emerging Local Plan Policies in accordance with the NPPF paragraph 48, the Development Proposals should therefore be considered in the context of up-to-date policies including the London Plan (2021) as required by the NPPF (Paragraph 11d) and footnote 7).
- 10.43. On balance, the proposed height and massing is considered to be consistent with the provisions of Policy CP30 of the Core Strategy, Policies DMD8 and DMD37 of the Development Management Document, and the NPPF .

*Layout*

- 10.44. The current public realm along Southbury Road is poor with high boundary fencing and predominately hardstanding. Policy 16.1 of the North East Area Action Plan (2016) states that the Council will develop a comprehensive street design scheme which helps to improve the setting of the station and improve pedestrian and cycle movements. The Council’s Green and Blue Infrastructure Strategy (2021) envisages a Green Link along Southbury Road which forms part of the latest emerging plan’s evidence base.



Figure 4: Existing poor streetscape along Southbury Road

- 10.45. The proposed development includes a row of two CBS Buildings along Southbury Road with entrances and substantial glazing fronting the street, which would activate the street. These CBS buildings have also been set back to allow a tree-lined pedestrian route in line with the Green Link aspiration in the Green and Blue



Infrastructure Strategy (2021). Whilst Officers would prefer the CBS block B to be flush with the adjacent proposed building, to allow sufficient space for the emerging Council-led two way cycle lanes along the southern side of Southbury Road, the Journeys and Places Team have undertaken a high level feasibility study, which has demonstrated that the works could still be accommodated with the current layout subject to relocation of the existing bus shelter and use of some carriageway (See also 'Traffic, Access and Parking' section). The applicant has also confirmed that Block B cannot be set back further due to the impact on the space available to the rear of the block for servicing. Hence, officers consider that the proposed layout would not compromise the future delivery of the public realm improvements along Southbury Road.

- 10.46. The proposed layout also includes a generous 11m wide landscape strip including 3m wide north-south pedestrian path along the eastern side, which would also help mitigate the impact of the Main Logistics Building upon residential properties to the east.
- 10.47. The overall layout of the site allows for suitable separation between different transport modes to maximise safety within and around the site. The staff parking at the rear of the site also allows for more activation of the site along the street frontage.

#### *Landscaping and public realm*

- 10.48. Along Southbury Road, the proposal includes 5 to 7.5 metre wide public realm for pedestrians. 2 existing trees with high amenity values will be retained together with 22 new semi-mature street trees and deep planting beds along this frontage.
- 10.49. An arrival square outside Southbury Station will also be created which will provide opportunity for new seating, cycle stands and wayfinding. Officers are having ongoing discussion with the Applicant and Network Rail and TfL (the landowner) to explore potential extension of the new public square to the Station. Appropriate obligations relating to delivery could be secured via a S106 agreement.
- 10.50. Along the eastern side of the Site, the scheme will include an 11 metre wide landscape strip with a pedestrian/cyclist shared north-south route, which would primarily be used by the staff and visitors of the units. It is noted that the emerging Local Plan has an aspiration of creating new walking route opportunities within the Site to connect Lincoln Way and Southbury Road as shown in Figure 3.3 Southbury Placemaking vision of the emerging Local Plan. Officers have explored the possibility of making the proposed north-south route more accessible by creating external steps directly from the proposed new station square into the site. However, the Applicant has provided justifications to demonstrate that this is not feasible nor viable mainly due to the difference in site levels between the site and the new station square, and a substantial amount of land of the north-south route within the land needed to be given up for public access. Other active travel measures will be secured to improve the walking and cycling infrastructure in the area (See 'Traffic, Access and Parking section below'). The frontages along Southbury Road would be substantially improved as set out above. It is therefore considered that the current proposal would be largely in line with aspirations of Policy PL2 (6) of the emerging Local Plan to contribute to improvements to the public realm and townscape particularly along Great Cambridge Road and Southbury Road, albeit noting this draft Local Plan Policy currently holds relatively little weight.
- 10.51. Two staff amenity gardens are proposed adjacent to the CBS units. These gardens will have a combination of lawn and paved areas with benches and picnic tables. The

Applicant has been encouraged to further explore the potential of increasing the external amenity spaces provision such as along the north-south route. The provision of staff external amenity space would be conditioned as part of the landscape condition

- 10.52. Within the car parking area at the rear of the site, a range of porous paving options within the parking spaces is being explored, such as grasscrete and cellular gravel and using the drainage water to feed the tree pits. The CBS buildings will also incorporate green roofs.
- 10.53. The final details of the landscape plans will be secured via conditions to ensure the overall landscape scheme integrates with other considerations including sustainable drainage, biodiversity enhancement, amenity space provision, visual appearance, fire safety, security and external lighting.

#### *Detailing and materials*

- 10.54. The detailing of the buildings would broadly reflect some common features in the area particularly the proposed use of brick for the CBS buildings which would complement the redbrick of Southbury Station and other notable brick buildings in Ponders End. The proposed substantial green wall across all levels at the north-east corner of the Main Logistics Building would also create visual interest and improve legibility. Following the advice from the Design Review Panel and Officers, the Applicant has made positive changes to enhance the appearance of the proposed buildings such as new ground-based green walls along the ramp and simplifying the windows design of the CBS buildings.

#### *Inclusive Design*

- 10.55. London Plan Policy D5 requires all new development to achieve the highest standard of accessible and inclusive design and to be able to be used easily and with dignity by all. All entrances would be at grade with level thresholds as shown on the submitted drawings. All the disabled parking spaces are located close to the entrances. The Fire Statement illustrates all lifts would be accessible in accordance with British standards. A condition will also be attached to ensure compliance in accordance with Policy D5 of the London Plan (2021). The proposal is able to comply with London Plan inclusive design policies.

#### *Secure by Design*

- 10.56. During the course of this Application, the Applicant met with the Designing Out Crime Officer (DOC) at the Metropolitan Police, and feedback was integrated into the proposed design. The DOC Officer initially raised a concern over the risk of traveller intrusion given the siting of the proposed gate houses away from the main vehicular access. However, a gatehouse near the entrance may disrupt the traffic on the Southbury Road when the vehicles queue into the Site. The DOC Officer confirmed that the risk of traveller intrusion can be mitigated by robust CCTV surveillance.
- 10.57. Overall, the Metropolitan Police have confirmed they have no objection to the application subject to a final 'Secured by Design' certification, declaration of conformity of the proposed lighting details to BS 5489-1:2013/2020 and CCTV details. Conditions have therefore been recommended in accordance with Policy D11 of the London Plan and Policy DMD 37 of the Development Management Document (2014).

#### *Conclusion on Character and Design*

- 10.45. Considering the above, the proposed height, massing, layout and appearance is generally consistent with the industrial character of the wider SIL and the emerging context. The proposed development with high quality building design and public realm and landscape improvements would not result in harm to the immediate setting of the heritage assets. Where some suggestions made by officers have not been pursued, the applicant has provided sufficient justifications. On balance, it is considered that the proposed development would improve the frontages on the public realm particular along Southbury Road which currently hosts a utilitarian building and mainly hardstanding. The proposed development therefore would comply with Policies D3 and D4 of the London Plan, CS30 of the Core Strategy, DMD23, DMD37 and DMD39 of the DMD.

#### Heritage, Townscape and Archaeology

- 10.46. Sections 16 and 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 impose a statutory duty on planning authorities to safeguard the special interest of listed buildings and their settings. Section 72 of the Act imposes a statutory duty on planning authorities to preserve or enhance the character and appearance of conservation areas. The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the tests for dealing with heritage assets in planning decisions. In relation to listed buildings, all planning decisions should “*have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses*”. In relation to conservation areas, special attention must be paid to “*the desirability of preserving or enhancing the character or appearance of that area*”.
- 10.47. The NPPF states that when considering the impact of the proposal on the significance of a designated heritage asset, great weight should be given to the asset’s conservation and the more important the asset, the greater the weight should be (para 199). Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting (para 200). Significance is the value of the heritage asset because of its heritage interest, which may be archaeological, architectural, artistic or historic, and may derive from a heritage asset’s physical presence or its setting (Annex 2). There should be ‘clear and convincing’ justification for any harm to, or loss of, a designated heritage asset (para 200). Where a development will lead to ‘less than substantial harm’, the harm should be weighed against the public benefits of the proposal, including securing its optimum viable use (para 202).
- 10.48. London Plan Policy HC1 requires development proposals which affect the setting of heritage assets (designated and non-designated) to be sympathetic to their significance and appreciate their surroundings. Harm should be avoided, and enhancement opportunities taken where they arise. Policy DMD 44 advises applications for development which fail to conserve and enhance the special interest, significance or setting of a heritage asset will be refused whilst Policy DMD 37 requires that development must be suitable for its intended function and improve an area through responding to the local character, clearly distinguishing public and private spaces, and a variety of choice. Making Enfield: Enfield Heritage Strategy 2019-2024 SPD (2019) is also relevant.

10.49. The first step is for the decision-maker to consider each of the designated heritage assets (referred to hereafter simply as “heritage assets”) which would be affected by the proposed development (the applicant should describe the significance of the heritage assets affected) in turn and assess whether the proposed development would result in any harm to the heritage asset. The decision of the Court of Appeal in *Barnwell Manor* confirms that the assessment of the degree of harm to the heritage asset is a matter of planning judgement for the decision-maker. However, where the decision-maker concludes that there would be some harm to the heritage asset, in deciding whether that harm would be outweighed by the advantages of the proposed development (in the course of undertaking the analysis required by s.70 (2) of the Town and Country Planning Act 1990 and s.38 (6) of the Planning and Compulsory Purchase Act 2004), the decisionmaker is not free to give the harm such weight as the decision-maker thinks appropriate. Rather, *Barnwell Manor* establishes that a finding of harm to a heritage asset is a consideration to which the decision-maker must give considerable importance and weight in carrying out the balancing exercise. There is therefore a “strong presumption” against granting planning permission for development which would harm a heritage asset. In the *Forge Field* case the High Court explained that the presumption is a statutory one. It is not irrefutable. It can be outweighed by material considerations powerful enough to do so. However, a local planning authority can only properly strike the balance between harm to a heritage asset on the one hand and planning benefits on the other if it is conscious of the statutory presumption in favour of preservation and if it demonstrably applies that presumption to the proposal it is considering. The case-law also establishes that even where the harm identified is ‘less than substantial’ (NPPF para 199), that harm must still be given considerable importance and weight. Where more than one heritage asset would be harmed by the proposed development, the decision-maker also needs to ensure that when the balancing exercise is undertaken, the cumulative effect of those several harms to individual assets is properly considered. Considerable importance and weight must be attached to each of the harms identified and to their cumulative effect. It is important to note that the identification of ‘less than substantial harm’ does not equate to a ‘less than substantial’ objection<sup>1</sup>. The decision-maker must apply a weighted or tilted balancing exercise, giving the assessed degree of harm (or enhancement) to the heritage asset ‘considerable importance and weight’ as against other considerations<sup>2</sup>. What follows is an officer assessment of the extent of harm which would result from the proposed development.

10.50. The NPPF is further amplified in a series of five steps in Historic England GPA 3: *The Setting of Historic Assets (2017)* setting out the stages of assessment and how opportunities for enhancement should be identified.

*Built Heritage in the immediate locality*

10.51. There are no designated or non-designated heritage assets within the Application Site boundary.

10.52. The Application Site is within the immediate setting of ‘Ripaults Factory’, a Grade II Listed Building (c.1930) in an art deco style. Adjacent to the site is Southbury Station,

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<sup>1</sup> *Barnwell vs. East Northamptonshire DC 2014* (para.29)

<sup>2</sup> *Kinsey vs. London Borough of Lewisham 2021* (para.84)

a Locally Listed building (1891). Other locally listed buildings are located in the wider vicinity of the site along with the Grade II listed Enfield Technical College (now known as the Heron Hall Academy) which is located approximately 150 metres to the south-east on the eastern side of the railway line.

- 10.53. Following officers' pre-application advice, the applicant has revised the proposal and placed the proposed smaller detached CBS buildings (10.25 m - 8.6m in height ) at the front of the site which would help to better define the streetscape whilst also providing a degree of screening for the larger massing of the proposed main logistics building. This is accompanied by a generous hard and soft landscaping scheme to Southbury Road including a new station square with public art.
- 10.54. The Conservation Officer confirmed whilst there is potential for harm to be caused, this can be fully mitigated through high quality architecture and landscaping which would help realise heritage benefits to the historic environment. Conditions have therefore been recommended to seek detailed drawings and materials of the building and the hard and soft landscaping plans to ensure the proposed structures would not have a detrimental impact upon the setting of the Grade II Listed Ripaults Factory and Locally Listed Southbury Station. A condition has been attached to ensure the CBS buildings will be completed prior to the occupation of the development.
- 10.55. The delivery of new public square and public arts strategy will be secured by S106 obligations.
- Townscape and views*
- 10.58. Officers have taken care to consider the impacts of the proposal on the designated and non-designated heritage assets and their settings. There has been consideration of views both into, and out of the conservation area and the setting of other assets.
- 10.59. NPPF paragraph 194 requires that in the determining of applications that local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be appropriate to the asset's significance.
- 10.60. A Built Heritage, Townscape and Visual Impact Appraisal was prepared by Turley Heritage and submitted in support of the planning application. The report assesses designated and non-designated built heritage assets that may be affected by the development, including the contribution of their settings to their significance, and concludes with an assessment of impact of the proposed development on the significance of relevant built heritage assets.
- 10.61. The visual appraisal identified a 1km zone of visual influence from the proposed development comprising local, short distance views as well as long distance views and assessed the impacts on 12 representative views including from Forty Hall Registered Park and Garden near the ferme ornee, and the two Important local views as identified in the Report on Location of Tall Buildings and Important Local Views in Enfield (March 2013), namely from Enfield Town (view 9) and King's Head Hill (view 2).
- 10.62. Conservation Officers considered the submitted assessment proportionate. Overall, it is considered that due to the distance and intervening built form, the proposed scheme is unlikely to have an impact upon the significance of heritage assets. This has been demonstrated through the Zone of Theoretical Visibility and Verified Views.

### *Heritage Conclusions*

- 10.63. The steps for assessing proposals affecting heritage assets are as set out in the NPPF Section 16: Conserving and Enhancing the Historic Environment and amplified by Historic England GPA 3: The Setting of Historic Assets. The duty to pay 'special regard' or 'special attention', in sections 16(2), 66(1) and 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 means that there is a 'strong presumption' against the grant of planning permission where it would cause harm to a heritage asset. Harm should be minimised and the desirability of enhancing the asset considered. Any harm to a designated asset requires 'clear and convincing' justification. For non-designated heritage assets there should be a 'balanced judgement' between harm and the significance of the asset.
- 10.64. Having taken into account the aforementioned heritage benefits including the proposed public realm and landscape improvements to Southbury Road and near the Station, Officers consider that on balance, the proposed scheme would not cause harm to the setting of the Grade II Listed 'Ripaults Factory' and Locally Listed Southbury Station subject to mitigation including high quality building architecture, public realm and landscaping and the completion of the CBS buildings to offer screening of the mass of the main logistics building prior to occupation of the development, which would be secured through conditions.

### *Archaeology*

- 10.65. The site is located within Southbury Road Archaeological Priority Area. Greater London Archaeology Advisory Service (GLAAS) has reviewed the Archaeological Desk-based Assessment prepared by MOLA on behalf of the Applicants and confirmed that the proposed development would not result in significant harm on the Southbury Road Archaeological Priority Area.

### Neighbouring Residential Amenity

#### *Daylight, sunlight and overshadowing*

- 10.66. London Plan Policy D9(3)(a) requires daylight and sunlight penetration around the tall buildings carefully considered. DMD 39 (1)(f) requires business premises to through layout, landscaping and other site features, helps to mitigate the potential for negative impacts on surrounding uses, including consideration of access arrangements for different uses within the site and wider area. In general, for assessing the sunlight and daylight impact of new development on existing buildings, Building Research Establishment (BRE) criteria is adopted. The BRE Guide itself emphasises that the target numerical values for measuring daylight, sunlight and overshadowing it contains are "advisory" and may be "varied to meet the needs of the development and its location". Hence, 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.
- 10.67. A Daylight, Sunlight, Overshadowing and Photovoltaics Assessment has been submitted. The submitted report has been completed by daylight/sunlight specialists with reference to the Building Research Establishment (BRE) Guidelines "Site Layout Planning for Daylight and Sunlight. A Guide to Good Practice" (BR209, 2022) and local planning policy. The following neighbouring properties were identified as relevant for daylight, sunlight, overshadowing and photovoltaics assessment based on proximity to the proposed development:





		advers e impact	e adverse impact	l adverse impact		advers e impact	e adverse impact	l adverse impact
1-26 Emelia Close	92	0	0	0	34	0	0	0
Link House (300 Southbury Road)	70	0	0	0	49	0	0	0
1-6, Poppy Drive	11	0	0	0	6	0	0	0
7-12 Poppy Drive	12	0	0	0	6	0	0	0
13-18 Poppy Drive	12	0	2	0	6	0	0	0
19-24 Poppy Drive	12	2	0	0	6	0	0	0
25-30 Poppy Drive	12	2	0	0	6	0	0	0
31-36 Poppy Drive	14	2	3	0	12	2	4	6
37-44 Poppy Drive	14	2	1	2	12	0	5	7
45-52 Poppy Drive	14	8	0	0	12	0	5	7
53-60 Poppy Drive	14	3	3	0	12	1	4	7
61-68 Poppy Drive	14	1	1	2	12	4	1	6
69-76 Poppy Drive	14	0	1	0	12	5	0	0
77-84 Poppy Drive	14	0	0	0	12	0	0	0
85-109 Poppy Drive	43	0	0	0	30	0	0	0
<b>Total</b>	<b>352</b>	<b>20</b>	<b>11</b>	<b>4</b>	<b>227</b>	<b>12</b>	<b>19</b>	<b>33</b>

10.71. As shown from Table 2 above, among the 352 habitable windows tested, 20 windows will experience a minor adverse impact, 11 windows will experience moderate adverse impact and 4 windows will experience substantial adverse impacts in relation to VSC.

10.72. In recent years, Inspectors and other decision makers have observed that achieving the BRE target level of VSC is challenging whilst seeking to make more efficient use of brownfield land in urban areas. For example, in the appeal decision relating redevelopment of the site for a phased mixed-use scheme, comprising 5 blocks of varying heights of between 9 and 37 storeys (including rooftop amenity) at Land to the north and south of Goldsworth Road, Woking (ref: APP/A3655/W/21/3276474), the inspector states the following in paragraph 35:

*“Retaining a VSC level of 27% in neighbouring properties is unrealistic; as has been recognised in many appeal decisions and other documents. Even retaining 20% VSC is considered, generally, to be reasonably good, and in urban areas retaining around mid-teen % VSC is considered acceptable”.*

10.73. Out of the 35 windows experiencing more than 20% reduction in VSC level, 15 of them will still retain an absolute VSC of above 20%.

10.74. Crucially these windows will experience noticeable changes in daylight mainly due the architectural design of these properties on Poppy Drive which includes several built in recessed balconies with projecting wings either side. Waldram diagrams have been submitted as part of the assessment and demonstrates that the existing architectural design of these properties currently restricts good levels of natural light received to the site facing window and rooms on ground and first floor (See the Figure 6 for the typical rear elevation of Poppy Drive).

10.75. The BRE Guidelines reference that ‘a larger reduction in VSC may also be unavoidable if the existing windows has projecting wings on one or both sides of it, or is recessed into the building so that it is obstructed on both sides as well as above’.

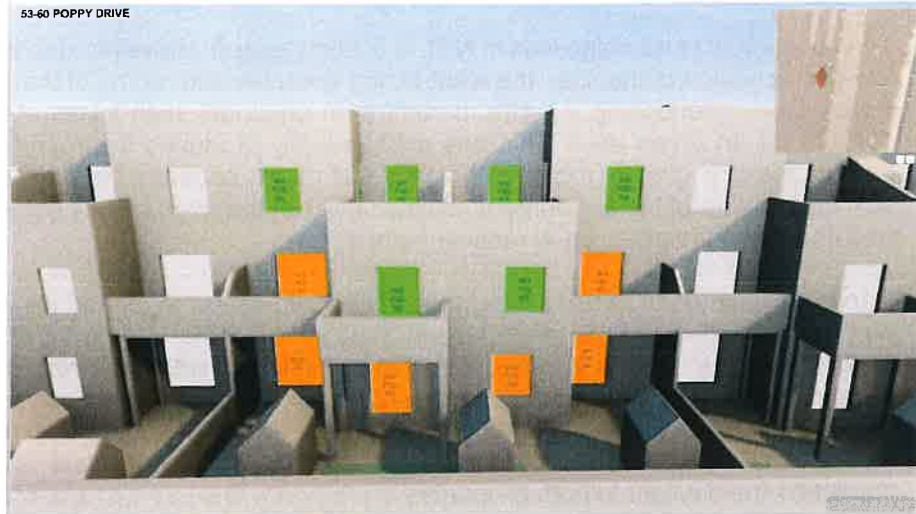


Figure 6 53-60 Poppy Drive

- 10.76. The submitted assessment results show that all of windows not located behind recessed balconies or side projections will retain VSC levels which are considered to be appropriate for an urban environment.
- 10.77. With regard to NSL, among the 227 habitable rooms tested, 12 habitable rooms will experience a minor adverse impact, 19 windows will experience moderate adverse impact and 33 windows will experience substantial adverse impacts.
- 10.78. The impacts on NSL of these habitable rooms are mainly because Poppy Drive properties benefit from larger than average room depths, reaching c.7-8m in depth, which can impact the extent of the reduction in daylight distribution (NSL) as shown in a typical NSL contour of the ground floor rooms on Poppy Drive below. The Guidelines state that *"If any existing building contains rooms lit from one side only and greater than 5m deep, then a greater movement of the No Sky Line may be unavoidable"*.

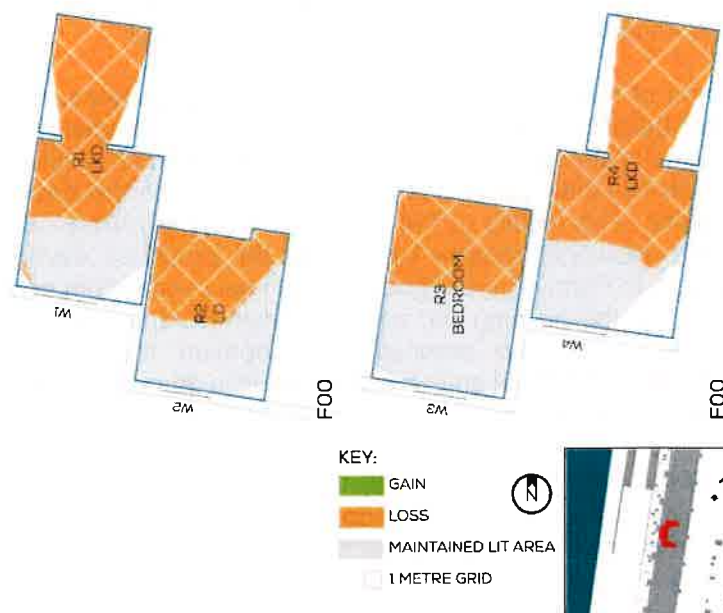


Figure 7 NSL contours of Ground Floor 53-60 Poppy Drive

- 10.79. The substantial percentage loss in NSL is acknowledged. However, due to the existing low-rise condition of the site, the west-facing windows and rooms of the properties on Poppy Drive overlooking the site, benefit from unusually high levels of daylight and sunlight for an urban area. This has subsequently produced disproportionately high percentage changes. 39 rooms out of these 64 rooms experiencing 20% reduction will still retain a view of the sky dome of almost 50% + of the room in the proposed scenario and thus have the potential to receive natural light.
- 10.80. Concerns have been raised during the public consultation regarding the impact of the proposed development on daylight and sunlight available to Nos 57 and 60 Poppy Drive. 57 Poppy Drive is a 1 bedroom flat on first floor within the rear projection. 60 Poppy Drive is a two bedroom flat on second floor. The submitted analysis has shown the BRE default targets have been met in terms of VSC (See Figure 6 above) and NSL. Hence, it is considered the proposed development would not result in any adverse impact on the daylight to both properties.
- 10.81. It is considered the proposed development will result in some adverse impact on the daylight of some ground floor and second floor flats on Poppy Drive given the number of windows and rooms experiencing non-compliance to the BRE default VSC and NSL targets and the degree of the non-compliance. However, the impacts are mainly exacerbated by the existing architectural features including projecting wings and projecting balconies, and deep room depths of these properties. In order to optimise the use of brownfield land in such a highly sustainable location for industrial intensification within designated SIL, an increase in height and massing is inevitable. The impact on daylight to these properties has been minimised. Following the comments received from officers and the public during pre-application discussions, the set-in of the Main Logistics Building from the eastern boundary has increased to 25-21m. The overall height of this building has also been reduced by 3m. The pedestrian link bridge in the rear car park has also been removed. Overall, Officers consider that the adverse impacts on daylight when balanced against the wider public benefits generated by the scheme are not a reason for refusal.
- 10.82. In terms of sunlight, the proposed development would fully satisfy BRE's default target for the Annual Probably Sunlight Hours ('APSH') test.
- 10.83. In terms of overshadowing to the neighbouring gardens, the BRE guidance (2022) advises that if less than 50% of the existing garden or amenity area can receive at least two hours of sunlight on 21 March or the area that can receive two hours of sun on 21 March is less than 0.80 times its former value, then the loss of sunlight is likely to be noticeable. The results of the Transient Overshadowing Assessment demonstrates that the additional shadow caused by the proposed development to the gardens belonging to Poppy Drive will be limited to between 4-5pm only. No change in shadow will occur in the morning and early afternoon when these amenity spaces are likely to be most used. The proposed development therefore would meet the BRE overshadowing targets and would not result in an unreasonable overshadowing to the neighbouring properties.
- Effect on solar energy generation*
- 10.84. Some PV panels are installed on the rooftop of the buildings on Poppy Drive. A Transient overshadowing assessment has been undertaken. It confirms that given the height and proximity of the proposed development; the building shadow does not cast onto the roof of 1-109 Poppy Drive. Hence, the proposed development is unlikely to

result in any adverse impact on the existing solar energy generation of 1-109 Poppy Drive.

#### *Privacy*

- 10.85. Following comments from the public and officers' advice during pre-application discussions, the Applicant has relocated the proposed offices from the eastern elevation of the Main logistics building to a stacked office layout at mezzanines level on the northern elevation. As a result, there will only be two strips of flank windows across all levels along the eastern elevation serving the firefighting stair core, plant rooms and breakout area / meeting rooms. These windows will be located at least 50m away from the rear boundary of the nearest residential properties on Poppy Drive. Considering the above, it is considered that the proposed development would not result in any unreasonable overlooking to the adjoining properties.

#### *Noise*

- *Construction*

- 10.86. It is proposed that construction noise and vibration will be controlled through the use of a Construction Environmental Management Plan (CEMP). Details of the CEMP were provided in section 5.0 of the Noise and Vibration Assessment and it has been confirmed by the Environmental Health Officer that this is satisfactory. A condition will be attached to ensure compliance.

- *Operation*

- 10.87. Noise from site activity during the night-time period will be below existing noise levels which are dictated by existing industrial noise, road traffic noise and noise from the adjacent rail line which forms the eastern site boundary.
- 10.88. The closest residential properties in Poppy Drive are to the east of the site on the other side of the rail line which forms the eastern boundary of the site. These properties were granted planning permission on Appeal. Being so close to the rail line these properties will have been designed and constructed to protect residents from existing noise levels, including industrial, road traffic and rail noise and are likely to include mitigation measures such as acoustic glazing and alternative means of ventilation to enable windows to be closed to achieve satisfactory daytime and night time internal noise levels. These measures will also protect residents of these properties against noise from the proposed development which as advised above is lower than existing noise levels.
- 10.89. The Noise and Vibration Assessment demonstrates that maximum levels, LAfmax associated with site activity will be below existing maximum noise levels measured on-site.
- 10.90. During the course of this application, the Applicant has also provided a technical noise addendum and updated the SoundPLAN models in response to the comments from the public and Environmental Health Officer. Taking the proposed noise from the first floor service yard into account, a BS 4142 noise assessment has been provided to illustrate night-time LAeq levels at the receptors from the proposed development which is considered acceptable by the Environmental Health Officer
- 10.91. Given the contextual considerations, the Environmental Health Officer has confirmed that the proposed development is unlikely to result in any adverse noise impact on the residential properties nearby. As the plant details cannot be confirmed at this stage

until the tenants are known, a condition will be attached to ensure the future plants will not result in an unacceptable noise level to the nearby residents.

*Light spill*

- 10.92. Different areas of the site will be lit by a mix of column mounted lanterns and building mounted lanterns to satisfy the operational needs while minimising the light spill to the residential properties in the locality. An External Lighting Assessment has been undertaken. A plan showing the design lux levels within the site demonstrates that given the lighting intensity and distance, the proposed lighting will result in minimal light spill onto the railway tracks. The impact would be further mitigated by the proposed 11m wide landscape buffer along the eastern boundary. The Environmental Health Officer has no objection.
- 10.93. During the course of this application, in response to the comments from the Environmental Health Officer, the boundary treatment along the first floor service yard has changed from mesh railing to louvred in order to prevent headlights of vehicles affecting residents on Poppy Drive. The details of proposed louvres has not been provided. The Environmental Health Officer would prefer solid materials to avoid any gaps for headlights to affect nearby residents. A condition for boundary treatments is recommended to request revised boundary treatments.

*Conclusion on Neighbouring Residential Amenities*

- 10.94. Overall, it is considered that the proposed scheme has been designed to respond to BRE's criteria as much as possible while optimising the site to deliver employment floorspace within designated SIL, in accordance with relevant policies within Enfield's Local Plan and The London Plan. The submitted Assessment has demonstrated that the default BRE targets for sunlight and overshadowing have been met. Hence, the impacts on these aspects are considered acceptable.
- 10.95. Whilst the proposed development would result in some adverse impacts on the daylight to some ground floor and first floor flats on Poppy Drive, the impacts need to be considered in the context of the particular design characteristics and internal layout of these residential properties, and the fairly minimal existing massing on the Application site which is unusual in an urban context. The Site is within designated SIL next to Southbury Station where industrial intensification in a highly sustainable location is strongly supported by the London Plan. On balance, Officers consider that when balancing the overall impact of the scheme in terms of daylight, sunlight and overshadowing with the many planning benefits that the scheme would deliver, the overall balance weighs in favour of the proposal.
- 10.96. The internal layout, external fenestration, site layout has also been carefully designed to avoid unreasonable overlooking to the nearby residential properties. The proposal has also been informed by technical noise and external lighting assessment to avoid any detrimental impacts on the amenities of the neighbouring dwellings in terms of noise, disturbance and light spill.
- 10.97. Overall, it is therefore considered that the proposal would be in accordance with Policies D3, D4, D6 and D14 of the London Plan (2021), CP 4 of the Enfield Core Strategy (2010) and Policies DMD 8, 10, 37, 68 and 69 of the Enfield Development Management Document (2014).

#### Flood Risk and Drainage

- 10.98. Policy SI 13 of the London Plan ) requires development proposals to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible. There should also be a preference for green over grey features, in line with the specified drainage hierarchy. Policy DMD 61 states developments should seek to achieve Greenfield runoff rates for 1 in 1 year and 1 in 100 year (plus climate change) year events and must maximise the use of Suds, including at least one 'at source' SuDS measure resulting in a net improvement in water quantity or quality discharging to sewer in-line with any SuDS guidance or requirements.
- 10.99. Flooding is not a known risk on this site. Classed as Flood Risk 1, the site is at low risk of fluvial flooding. The existing site mainly comprises impermeable surfaces. Based on the Enfield Level 1 Strategic Flood Risk Assessment, localised areas of the site are prone to surface water flooding for the 1 in 100 year (+17% climate change allowance) due to surface water generated from site.
- 10.100. A preliminary Flood Risk Assessment and Sustainable Drainage strategy has been submitted with the application. During the course of the application, the applicant has provided further modelling results of the existing drainage system to verify the model results provided in the Flood Risk Assessment are accurate. The proposed development would achieve green field run-off rates through a mix of above ground SUDS features and below ground tanks.
- 10.101. Upon the request from the Watercourses Team, the applicant has further improved the proposed sustainable surface water drainage strategy by including additional rain gardens, swales, rainwater harvesting, biodiverse roofs and understug and rainwater downpipes to discharge the runoff from the first floor service yard onto the permeable paving. The risk of siltation from the first floor service yard could be mitigated by a robust maintenance plan which would be secured via a condition. As a result, a substantial majority of the impermeable surface of the site would drain via SUDS source control measures.
- 10.102. The Council's Watercourses team has requested sight of the final design of the drainage strategy, and details of the proposed SuDS features and a management plan for future maintenance. A drainage verification report is also recommended to ensure compliance of the final drainage details. The requested information would be secured by way of conditions in accordance with Policies SI 12, SI 13 of the London Plan (2021), Policy CP 28 of the Enfield Core Strategy (2010) and Policies DMD 59, DMD 61 and DMD 63 of the Development Management Document (2014).
- 10.103. The proposed development is located within 5m of a strategic water main along Southbury Road. Thames Water requested a plan for diversion of the main water in case of any construction work within 5m of the strategic water main. This will be secured by condition.
- 10.104. Thames Water have no objection to the foul water sewerage network infrastructure capacity.

#### Biodiversity, Trees and Landscaping

- 10.105. Policy DMD 76 states that development on sites that abut a wildlife corridor will only be permitted if the proposal protects and enhances the corridor. Policy DMD 78 states that development that has a direct or indirect negative impact upon important ecological assets will only be permitted where the harm cannot reasonably be avoided,



and it has been demonstrated that appropriate mitigation can address the harm caused.

- 10.106. Policy G7 of the London Plan (2021) and Policy DMD 80 of the Development Management Document (2014) state that any development involving the loss of or harm to protected trees or trees of significant amenity or biodiversity value will be refused.

*Statutory Designated Sites*

- 10.107. The site is mainly comprised of hardstanding with some grass verges and small urban trees. Adjacent to the eastern side boundary, there is a designed Wildlife Corridor running along the railway line. The site is within 2km of the Chingford Reservoir SSSI and 3.1km of Epping Forest SAC and SSSI.
- 10.108. The submitted Ecological Appraisal Report with an ecological desk study concludes that the impact of the proposed development on the statutory designated sites in the surrounding 5km is expected to be negligible given the distance between the Site and the designated sites, coupled with the fact that the Site is located within a heavily urban area.
- 10.109. With regard to Epping Forest SAC, the Council as a Competent Authority has commissioned an external EIA/Ecology consultant to undertake an HRA Screening Report. The Report shows that given all associated HGV trips from the proposed development are anticipated to travel west from the site, away from Epping Forest SAC, there's no likely significant effect on the Epping Forest SAC. Natural England have reviewed the HRA Screening Report during the EIA Screening Opinion consultation (ref: 23/00488/SO) and confirmed that it is not necessary to progress to Stage 2: Appropriate Assessment. The LPA as a competent authority concurs with this opinion.
- 10.110. A Construction Environmental Management Plan (CEMP) has been submitted to minimise any potential impact during construction. A compliance condition will be attached to ensure the measures are followed.

*Trees*

- 10.111. The Tree Survey indicates a total of 15 existing trees and 5 groups of trees on site. Of these trees, only 1 tree is 'category A' (high grade), 3 trees are 'category B' (moderate grade), 10 individual trees and 5 groups of trees are 'category C' (low grade) and 1 tree is 'Category U' (very low grade).
- 10.112. 10 x low quality category C trees / tree groups and 1 x very low-quality category U tree will be removed to facilitate the proposed development. To compensate the loss of trees for the development, 193 new trees will be planted and 718m of native hedgerow will be created.
- 10.113. The proposed removal of existing hard surfaces and construction of new buildings will take place within the Tree Root Protection Areas (RPAs) of a category A street tree (T13) and a category B tree (T7) along Southbury Road. To minimise impact on these trees, an Arboricultural Method Statement and Tree Protection Plan will be secured through a planning condition. The Tree Officer has also suggested that given the asymmetrical form of the crown of T13, which would benefit from pruning back from the adjacent highway to bring the tree back into shape, fewer pruning works are

required on the development side. Again, this would be secured through the condition for an Arboricultural Method Statement.

10.114. The street tree (T13) is a London Plane which produces a dust on the underside of their leaves which can contribute towards eye nose and throat irritation, shade, bird excrement, and leaf fall. Whilst Officers would have preferred the CBS building B to be set back to alleviate potential conflict with the future tenants, the CBS building B does not involve any residential use and the Applicant has explored this option but confirmed it would not be viable due to the impact on the space available to the rear of the block for servicing. Given this street tree would still be retained, the proposed layout of the CBS building B is considered acceptable on balance.

10.115. On balance, the Tree Officer has no objection to the proposed development subject to above mentioned Arboricultural Method Statement and Tree Protection Plan condition to ensure the health and longevity of the retained trees.

#### *Habitats and Biodiversity Net Gain*

10.116. A Biodiversity Impact Assessment following the Natural England Metric 3.1 methodology has been undertaken to calculate the ecological value of the pre- and post-development site.

10.117. The existing site is dominated by building and hardstanding. The proposals include the creation of mixed scrub, introduced shrub, other neutral grassland, ground based green wall, façade bound green wall and biodiverse roofs, amongst other habitats. The proposals also include the planting of 193 new trees and the creation of 718m of native hedgerow

10.118. The Biodiversity Impact Assessment demonstrates that the proposed development would result in a net gain of 3.68 biodiversity units (area based) and 1.28 biodiversity units (linear based) compared with pre-development value. This is equivalent to a total net increase of 442.65% (area based) and 100% (linear based) in ecological value. This would exceed the emerging statutory minimum BNG requirement of 10%.

10.119. Policy G5 of London Plan (2021) requires major development proposals to contribute to the greening of London by including urban greening as a fundamental element of site and building design. This policy does not specify the minimum UGF target for industrial/logistics led mixed scheme ((Use Classes E(g)(iii), B2 and B8). An Urban Greening Factor Assessment has been undertaken in accordance with the Urban Green Factor LPG (2023). Whilst the proposed development will achieve a UGF score of 0.22 which would fall 0.08 short of the aspirational target for commercial developments (0.3), officers consider that green infrastructure has been maximised given the site constraints, and the development proposals represent a significant improvement on the current site conditions. The proposed landscape buffer along the eastern boundary would also enhance the adjacent Wildlife Corridor along the railway line.

10.120. Detailed landscaping plans and an Ecological Management Plan will also be secured by a landscaping details condition to ensure the delivery of the BNG and the greenery and its management for a period of at least 30 years in accordance with Policy DMD 81 and Policies G5 and G6 of London Plan (2021)

### *Protected Species*

- 10.121. The submitted Preliminary Ecological Appraisal (PEA) Report indicates the Site has the potential to support the following protected/notable species:
- High potential to support nesting birds;
  - Low potential to support roosting bats;
  - Low potential to support reptiles; and
  - Moderate potential to support hedgehog
- 10.122. The PEA confirms no further surveys for nesting birds. It recommends site clearance is undertaken outside of active nesting period (March to August inclusive) unless a suitably qualified ecologist has confirmed absence of active nests. This would be secured by a compliance condition.
- 10.123. The PEA also recommends phased vegetation clearance between April and September during warm weather conditions to avoid any harm to reptiles and hedgehogs. This would be secured by a compliance condition.
- 10.124. With regard to bats, the submitted Bat Survey Report has confirmed the likely-absence of roosting bats within the building on site and concluded that given the dominance of building and hardstanding on site, the sites value for foraging and commuting bats is limited and confined mainly to the north east corner of the site. To mitigate and enhance the habitats for foraging and commuting bats, a bat sensitive lighting scheme, fruit and berry producing shrubs and trees in the landscaping scheme and at least 6 bat boxes or bricks are recommended. The details of these measures would be secured via conditions.

### *Conclusion on Biodiversity, Trees and Landscaping*

- 10.125. Considering the above, the proposed development would not result in any significant harm to the trees of high amenity values or the local wildlife including the Epping Forest SAC and adjoining Wildlife Corridor. It would enhance the local biodiversity and greening subject to final details on the proposed landscaping scheme, proposed biodiversity enhancement measures and an Ecological Management Plan, which would be secured by conditions. The proposal therefore would comply with Policies G5, G6 and G7 of the London Plan (2021), Policy CP36 of the Enfield Core Strategy (2010) and Policies DMD76, 78, 79, 80 and 81 of the Enfield Development Management Document (2014).

### Traffic, Access and Parking

#### *Trip Generation*

- *Staff and operational*
- 10.126. The trip generation methodology and the assumptions about mode split and traffic distribution to the highway network have followed the pre-application advice from the Places and Journeys Team and TfL. The Transport Assessment indicates the site will generate circa 800 additional daily vehicle movements compared to existing demand, this includes around 380 Heavy Goods Vehicles (HGV). The peak hour increase in demand will be circa 70 vehicle movements including 34 HGVs.
- 10.127. Following Officers' advice during pre-application discussions, a sensitivity test has been undertaken to assess the impact of the site access/junction from Southbury Road. The modelling shows that trip generation could increase by 500% AM and 625%PM before the Ratio of Flow to Capacity (RFC) exceeds 0.85 (i.e. when the

access junction suffers significant delays and queueing). The modelling of the actual estimates shows that the maximum RFC will be 0.53, which is well within the junction capacity. This is accepted by both Places and Journeys Team and TfL.

- 10.128. The distribution included a "worst case scenario", whereby 100% HGV movements went through to the A10 / Southbury Road junction. The % increase in vehicles using the A10/Southbury Road junction, based on the existing traffic flows Automatic Traffic Count (ATC) data was shown to be 1.6% (AM) 1.3% (PM). Given the relatively low impact, both TfL and LBE Journeys and Places Team are satisfied that the impact on the strategic highway network (A10) has been assessed appropriately.
- 10.129. Following the comments from National Highways (NH), the Applicant has also provided a Technical Note regarding vehicle trip generation and its distribution / assignment up to the M25 Junction 25, which is a strategic road network (SRN). NH has confirmed that they are satisfied that the proposal would not materially affect the safety, reliability, and/or operation of the strategic road network (SRN).

- *Underground and Train, Buses*

- 10.130. The applicant has forecast trips on both underground and rail. TfL agree with the applicant's conclusion that all trips should be focused on Southbury station given its proximity. The proposal is not expected to generate the need for additional bus capacity. The Council-led new footway and cycle lanes along Southbury Road may require relocation of the bus shelter which would be discussed further between LBE Journeys and Places and TfL separately outside this Application.

*Parking*

- *Staff parking*

- 10.131. The Application proposes 145 x staff parking spaces, which sits towards the lower limit of the 70-434 range of the London Plan maximum parking standards. The parking provision has been discussed in detail through the pre-application stage and has been reduced from an original provision of 239 x spaces down to 145 x spaces. The proposed parking provision allows for shifts of FTE employees (470) to changeover with some overlap of parking space occupancy during the operation in 3 x shifts over 24 hours. The provision represents an overall modal share for vehicles of 32%. This is in line with the Mayor's targets set out in the London Plan to reduce dependence of private car.
- 10.132. The proposal also includes commitment to a Travel Plan to ensure a desirable modal shift from cars. This will be secured through the S106 Agreement.
- 10.133. The principle that over 10% of total provision will be blue badge spaces is welcome along with 20% active electric vehicle charging (EVCP) provision. Details will be secured via a condition.

- *Operational Parking*

- 10.134. The proposals also include 52 operational spaces for light goods vehicles (LGVs) and 24 bays within the building for heavy goods vehicles (HGVs). This is considered reasonable to serve 36,554 sq. of proposed operational floorspace. It is also welcomed that all 52 LGV spaces will accommodate EV fast charging (7-22Kw) provision and that the van / cycle shared area will accommodate eight EV fast charging points.

- 10.135. An Outline Car Park Management Plan (CPMP) has been submitted. The Final CPMP would be secured by condition in order to support the mode shift targets in the travel plan - When mode shift targets are not met, the CPMP should allow for the removal of staff parking to encourage further mode shift.

*Vehicular Access and Layout*

- 10.136. The vehicular access will remain from the existing access to the site from Southbury Road, which is part of a junction with Crown Road with proposed widening to allow easier access for HGVs. Offsite upgrades including tactile paving and potential refuge, given the width of the access and the high level of use of the footway by pedestrians (close to buses and Southbury Station) will also be proposed. The Places and Journeys Team confirmed they are acceptable.
- 10.137. The Transport Assessment also includes plans showing additional tracking for HGVs accessing and egressing the site, and manoeuvring within the car park. Tracking has also been provided for refuse vehicles. The Places and Journeys Team confirmed that the proposed layout would be acceptable. Furthermore, proposed security gatehouses are set back further into the site, hence vehicles do not have to stop and potentially queue or overhang the footway.

*Pedestrian and Cyclist Access*

- 10.138. Pedestrian access is shown throughout the site on proposed pedestrian footways and pedestrian crossings over the vehicle access routes.
- 10.139. The main external pedestrian access is from the main entrance, shared with the operational and staff vehicles with a segregated footway and refuge island in the middle of the vehicle access within the Applicant's land ownership.
- 10.140. It is noted that a secondary pedestrian and cyclist access from the new station square would have been more desirable. However, the Applicant has explored this suggestion but considered this unfeasible and unviable mainly due to the site levels and the future operation and maintenance. Other active travel measures as stated in the 'Healthy Street / Active Travel' section below would be secured instead. The Places and Journeys Team have confirmed no objection to the current proposal given the routes through the main access would still provide a safe access route for pedestrians or cyclists.

*Cycle Parking*

- 10.141. During the course of the application, the Applicant has further increased the cycle parking provision. 133 x long stay spaces and 60 x short stay spaces will be provided which meet and exceed London Plan standards respectively. 5% of all provision will be suitable for wider/larger cycles. The Applicant has also clarified that there is a route to the west of the site adjacent to the ramp to access the long stay cycle parking on the south-western part of the Site, keeping cyclists segregated from service yard activity.
- 10.142. A condition has been attached to request details of the bicycle stores to ensure they are sheltered, secured, and provided prior to the first occupation in accordance with DMD Policy 45, Policy T6.1 of The London Plan (2021) and Chapter 8 of the London Cycling Design Standards (LCDS).

- 10.143. Following TfL's comments, the Applicant has clarified that any future cargo bikes will be accommodated within the building and operated in a way similar to other operational vehicles. Since the use of cargo bikes will be dependent on the occupiers of the buildings, which is unknown at this stage, the details will be secured via the CPMP condition.

#### *Healthy Street / Active Travel*

- 10.144. In order to achieve the desirable mode shift to meet the Mayor's targets set out in the London Plan to reduce dependence of private car, the Applicant is expected to make a financial contribution to deliver walking and cycling infrastructure. At the time of writing this report, the amount of financial contribution is under ongoing discussion with the Applicant and the Places and Journeys Team.
- 10.145. Also, the Applicant has committed to dedicate land to enable the emerging Council-led footway and two way cycle lanes along Southbury Road and potentially an enlarged station square outside the red-line boundary of the Application Site, which may be able to accommodate a new cycle hub to facilitate park-and-ride. Given the concerned land of the enlarged station square between the Applicant Site and the Southbury station is owned by Network Rail and TfL, there has been ongoing discussion on the delivery mechanism with those stakeholders. It is expected that the Applicant would commit to an active travel contribution which could contribute towards the works. This matter would be further discussed with Network Rail and TfL. The delivery of the enlarged public square would be secured by suitably worded S106 obligation.

#### *Construction logistics (CLP)*

- 10.146. An outline Construction Logistics Plan has been submitted. TfL requested that a full CLP to be conditioned in line with Policy T7 of the London Plan. The full CLP should detail all logistics and construction proposals to ensure that pedestrian and cyclist movement and safety and bus operations are maintained throughout construction in order to support sustainable travel in line with London Plan policies and the Mayor's Vision Zero goal to eliminate deaths and serious injuries from London's transport networks by 2041 and ensure compliance with policy T4 part F of the London Plan which states development proposals should not increase road danger.

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

- 10.147. Overall the Places and Journeys Team and TfL have no objection to the proposed development subject to conditions. The proposed development would not result in conditions prejudicial to the safety and free flow of traffic in the surrounding area. Also, sustainable mode of transport would be promoted through a Travel Plan and improvements of walking and cycling infrastructure in the locality with an active travel financial contribution and dedication of land from the Applicant. Hence, the proposal would comply with Policy T6.1 of the London Plan (2021), Policies CP22 and CP25 of the Enfield Core Strategy (2010) and Policies DMD45 and DMD47 of the Enfield Development Management Document (2014).

#### Sustainable Design and Construction

##### *Operational Carbon Emissions*

- 10.148. Policy SI 2 of the London Plan (2021) requires major development to be net zero carbon. A minimum on-site reduction of at least 35% beyond Building Regulations

(2021) is required including unregulated operational emissions. Non-residential development should achieve 15 per cent through energy efficiency measures.

- 10.149. Based on the submitted revised Energy Statement, at the 'Be lean' stage, the proposed development would be able to achieve a 17% reduction by thermally efficient fabric, high performance glazing, reduced air permeability and energy-efficient lighting with appropriate controls and PIR sensors. Upon the request from the GLA Energy Officers, the Applicant has provided further evidence of lighting data sheets confirming the proposed lighting zones efficacy of over 150 lm/W is achievable.
- 10.150. With regard to the 'be clean' stage, the Site is located within Heat Network Priority Area and in close proximity to the Meridian Water Heat Network. London Plan Policy SI 3 (D) of the London Plan (2021) requires major development proposals within Heat Network Priority Areas to have a communal low temperature heating system. The Applicant has engaged with Energetik who have confirmed that they can install the pipework infrastructure to the site boundary and provide a Heat Interface Units for Heat Exchangers to facilitate a DEN connection.
- 10.151. Since the tenants of the proposed buildings are not yet known, the current assessment shows a relatively low demand for space heating and hot water in the proposed buildings, mainly from ancillary offices only. As part of the base build of the main logistics building, the Applicant proposes a Hybrid Variable Refrigerant Flow (HVRF) system for space heating and dedicated Domestic Heat Water (DHW) heat pump for hot water. No Heating, Ventilation, and Air Conditioning (HVAC) will be installed within the main warehouse spaces. The CBS buildings will not be fitted out until the end tenant is known.
- 10.152. To enable the future installation of DEN connections into all the proposed units as and when the demand for thermal energy arise, the routes between the connection points of main logistics and CBS buildings and the future pipe along Southbury Road will be safeguarded. The routes have been confirmed by Energetik. A S106 obligation will be secured to ensure future DEN connections subject to future heat demand from the proposed building, which is supported by the GLA Officers.
- 10.153. At the 'Be Green' stage, the proposed use of air source heat pumps and maximisation of the roof space for photovoltaics would achieve a further 80% of the on-site carbon emissions reduction, resulting in a total saving of 97% of the regulated operational carbon emissions above the Part L (2021). Upon request from the GLA Officers, further details of the proposed DHW heat pumps for the main logistics building and the PV array including capacity (kWp), total net area (m<sup>2</sup>) and annual output (kWh) have been provided. Officers are satisfied that the roof space of the proposed buildings has been maximised for PV array integrating the biodiverse roofs. A condition will request the details of the final heating system of the CBS buildings. All the 'be green' measures will be required to be installed prior to first occupation of the development through condition.
- 10.154. The final Energy Performance Certificate with associated Building Regulations Compliance Report and Display Energy Certificate after practical completion of the building will be secured to ensure compliance of the revised Energy Statement via a condition. Furthermore, the post-occupation energy consumption will be monitored for 5 years in accordance with the London Plan Be Seen Guidance (2021). This will be secured by a 106 obligation.
- 10.155. A financial contribution of £11,606.00 would be secured via the S106 agreement to offset the residual operational carbon emissions against the net zero carbon target.



- 10.156. The Climate Change and Sustainability Team has no objection to the proposed development subject to the above mentioned planning conditions and S106 obligations. Considering the above, it is therefore considered that the proposed development would comply with the energy hierarchy and Policies SI 2 and SI3 of the London Plan (2021).

#### *Overheating*

- 10.157. An overheating / Thermal Comfort Assessment on both the main logistics building and CBS buildings has been submitted as part of the Energy Statement. Details include passive cooling measures such as locating the skylights on the north-facing sections of the roof of the main logistics building, using solar control glazing, and designing the offices to include natural ventilation if required. The Climate Change and Sustainability Team and GLA Energy Officers have confirmed that the Applicant has demonstrated that the actual building's cooling demand is lower than the notional. A condition will also be attached to ensure compliance. It is therefore considered that the risk of overheating and cooling demand has been minimised broadly in line with the cooling hierarchy of London Plan Policy SI 4.

#### *Whole Life Carbon Assessment*

- 10.158. In accordance with London Plan Policy SI2 the applicant is required to calculate and reduce whole life-cycle carbon (WLC) emissions to fully capture the development's carbon footprint including the following 4 stages:

- Module A1 – A5 (product sourcing and construction stage)
- Module B1 – B7 (use stage)
- Module C1 – C4 (end-of-life stage)
- Module D (benefits and loads beyond the system boundary)

- 10.159. The applicant has submitted a Whole Life-Cycle Carbon Assessment. In response to the GLA Energy Officer's comments, the Applicant has further amended the GLA Whole Life Carbon Spreadsheet with the baseline elements in line with RICS Guidance. The key proposed actions include reuse of a retaining wall, use of substructure concrete with 30% Ground Granulated Blast Furnace Slag (GGBS)<sup>3</sup> and use of crushed concrete for backfilling, type 1 base and the concrete yard of the proposed Main Logistics building.

- 10.160. As a result of the proposed actions, the proposed development would meet the WLC Benchmark at all modules. Modules A-C (excluding operational energy and water use) is less than 5% higher than WLC Aspirational Benchmark. The Modules B-C is even lower than Aspirational Benchmark. A condition will be attached to request for post construction monitoring report to ensure the compliance of the WLC reduction actions. It is therefore considered that The WLC assessment is in general accordance with London Plan Policy SI2 and the WLC LPG (2022).

#### *Circular Economy*

- 10.161. London Plan Policy D3 requires development proposals to integrate circular economy principles as part of the design process. London Plan Policy SI7 requires development

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<sup>3</sup> Ground Granulated Blast Furnace Slag (GGBS) is an environmentally friendly product, made from a by-product of iron and steel making

applications that are referable to the Mayor of London to submit a Circular Economy Statement, following the Circular Economy Statements LPG (2022).

- 10.162. In response to GLA Energy Officers' comments, the Applicant has revised the Circular Economy Statement, completed GLA CE template and supporting evidence including pre-demolition development audit, pre-demolition audit and outline Construction Site Waste Management Plan and Operational Waste Strategy.
- 10.163. The Applicant has fully explored the retrofit options of refurbishment and extensions. The retrofit options were discussed at the first Design Review Panel. Officers are satisfied that the retrofit options are discounted as they would not meet the GLA objectives of achieving industrial intensification and utilising brownfield sites efficiently given the structural limitations of the current foundations which would not be able to support a multi storey warehouse. Furthermore, the existing building does not orientate itself to the site well from a placemaking perspective. The retrofit options would not help address a more positive relationship with Southbury Road.
- 10.164. Embodied carbon of the main structural items has been provided in the revised Pre-Demolition Audit. 96% of the 12,550 tonnes estimated waste will go to reuse, recycle and recovery including 80% of steel to be reused and 20% to be recycled. The estimated embodied carbon (CO<sub>2</sub>e tonnes) would be reduced from 7094.13 CO<sub>2</sub>e tonnes to 4,636 CO<sub>2</sub>e tonnes. In order to maximise the off-site re-use opportunities of the existing materials, the Climate Change Sustainability Team requested the Applicant to use the Excess Materials Exchange (EME). This would be secured by a compliance condition.
- 10.165. The Applicant has also provided additional costs information and demonstrated a commitment to the 20% reused or recycled content target by value for the whole development.
- 10.166. The Operational Waste Strategy satisfactorily demonstrates how 75% business waste recycling target would be met, complying with Policies D3, SI 7 and D6 of London Plan (2021).
- 10.167. The Circular Economy Statement shows an example of how the building has been planned in relation to the cores to provide a flexible footprint for subdivision and also how it could potentially be converted to other uses in the future.
- 10.168. A condition will be attached to request a postconstruction report to ensure delivery of all the proposed waste minimisation measures.

#### *BREEAM*

- 10.169. A Sustainability Statement including a Design Stage BREEAM Pre-Assessment and Water Efficiency Calculation has been submitted. It demonstrates that the proposed development would meet the 'Excellent' rating with target scores of 71.31% and 71.25% for the proposed CBS buildings and main logistics building respectively. Both scores are lower than the target of 85% to achieve 'Outstanding' rating as recommended by Policy 50 of DMD (2014).
- 10.170. The Design Stage BREEAM Pre-Assessment shows a minimum of 5 out of 7 credits under MAT 1 (life cycle impact assessment) and a minimum of 4 out of 4 credits under MAT 3 (Responsible sourcing of materials). The targets of these two elements are met as required Policy 57 of DMD (2014).

- 10.171. The proposed development would target a 65% improvement in water efficiency over notional baseline for the 'Wat 01' water category through water efficient sanitaryware specification, complying with the Policy 58 of DMD (2014) and SI 5 of London Plan (2021)
- 10.172. Despite the deviations from the overall BREEAM target recommended by Policy 50 of DMD (2014), the Applicant will strive to achieve BREEAM outstanding. Furthermore, the Applicant has demonstrated commitments to sustainable design and construction in other regards (see the above sections). On balance, it is therefore considered that the BREEAM performance of the proposed development is acceptable at this stage in this instance. A condition has been attached to seek design stage and post construction assessments.

#### Fire Safety

- 10.173. Policy D12 of the London Plan states that major applications should be accompanied by a fire statement, prepared by a suitably qualified third party assessor, demonstrating how the development proposals would achieve the highest standards of fire safety, including details of construction methods and materials, means of escape, fire safety features and means of access for fire service personnel. Further to the above, Policy D5 (B5) of the London Plan seeks to ensure that developments incorporate safe and dignified emergency evacuation for all building users, with fire evacuation lifts suitable to be used to evacuate people who require level access from the buildings.
- 10.174. A Fire Statement has been submitted and illustrates how provisions have been made for the safety of occupants as well as the provision of suitable access and provisions for firefighting considering the London Plan's fire safety policy requirements and the rationale for these measures. The Building Control Team has reviewed the Fire Statement and confirmed no objection. In response to GLA Officers' comments in relation to the green wall, a revised Fire Statement has been submitted to illustrate the measures to ensure fire safety in section 5.2 of the revised Fire Statement. A condition will be attached to ensure compliance of the Fire Statement. Having regard to the above, it is considered that the proposed fire safety arrangements are acceptable subject to condition.

#### Air Quality

- 10.175. Policy SI 1 (Improving Air Quality) of the London Plan states that any development proposal should not lead to further deterioration of existing poor air quality and not be located or operated in a manner that would subject vulnerable people to poor air quality.

#### Construction

- 10.176. The submitted Air Quality Assessment assesses the dust impacts and demolition and construction traffic impacts on the sensitivity receptors. Dust control measures are proposed at the site during the various stages of redevelopment of the site. The Environmental Health Officer has confirmed no objection subject to compliance to the dust control measures and restrictions on the emissions from all non-road mobile machinery during demolition and construction. The final Construction Management Plan will also be secured via a condition.

### *Operational*

- 10.177. Concentrations of NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> have been predicted at worst-case locations representing existing properties adjacent to the road network. Predicted concentrations are below the relevant objectives at all the existing receptor locations with the proposed development in place. Whilst the scheme, based on these worse case assumptions, is currently not 'air quality neutral' when compared to the transport emission benchmark, the Environmental Health Officer has confirmed the mitigation measures set out in the Air Quality Assessment to reduce vehicle trips would be sufficient to mitigate against the worst case of 51,290 additional annual trips from the development over the total benchmark trip rate. This would be secured through a compliance condition. It is therefore considered that the proposed development would comply with Policy SI 1 of London Plan (2021).

### Land Contamination

- 10.178. The submitted Preliminary Risk Assessment and Ground Investigation Report together with a Note on Ground Investigations show that there are ground contaminants that pose a risk to human health at the site which require remediation and further investigation. The Environmental Health Officer confirmed that the proposed development is unlikely to result in adverse land contamination subject to an acceptable scheme to deal with the contamination of the site, which would be secured by a planning condition.

### Health Impact Assessment

- 10.179. London Plan Policy GG3 outlines that to improve Londoners' health and reduce health inequalities, those involved in planning and development must adhere to outlined criteria.
- 10.180. An assessment of the potential health effects of the proposed development has been undertaken using the NHS London Healthy Urban Development Unit (HUDU) Checklist (2017) and rapid HIA tool (2019). Officers consider that the proposed development would comply with Policy GG 3 subject to the implementation of the recommendations of the assessment including ongoing public engagement to support opportunities for voluntary and community sectors as these organisations can offer invaluable services supporting community wellbeing and health that are not addressed by the state or private sector. A compliance condition is therefore attached to ensure compliance to the Health Impact Assessment.

### Digital Connectivity

- 10.181. As requested by the GLA Officers, a planning condition is recommended requiring the submission of detailed plans demonstrating the provision of sufficient ducting space for full fibre connectivity infrastructure within the development in line with London Plan Policy SI6.

### Community Infrastructure Levy (CIL)

#### *Mayoral CIL*

- 10.182. The Mayoral CIL is collected by the Council on behalf of the Mayor of London. The amount that is sought for the scheme is calculated on the net increase of gross internal floor area multiplied by an Outer London weighting (increased to £60per sqm as of 1st April 2019). The estimated CIL liability is £1,175,437.27.

*Enfield CIL*

- 10.183. The Council introduced its own CIL on 1st April 2016. The proposed uses of the Main Logistics building (Use Classes E(g)(iii), B2 and B8) have a charging rate of £0. Given the sub-classes (a,b,c) within Class E have a charging rate of £60. Unless the Applicant accepts a restriction on the future changes of the CBS, it is likely that the proposed uses of the CBS building (Use Classes E, B2 and B8) will be CIL liable. The estimated CIL liability is £76,443.23.
- 10.184. The estimated Mayoral and Enfield CIL liabilities above have been calculated using the Exacom public CIL calculator. CIL liability may change and would be confirmed by the CIL team at the point of issuing the CIL liability Notice..

S106 Heads of Terms

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

<b>Heads of Term</b>	<b>Description</b>	<b>Sum</b>
Transport	Active travel contribution	TBC
	Dedication of land for future walking and cycling infrastructure	N/A
	Travel Plan	TBC
Climate change	Carbon offset fund contribution	£11,606.00
	Be-seen monitoring	N/A
	District Heat Network connection strategy	N/A
Public realm	Delivery of new public square	N/A
	Public arts strategy	N/A
Employment and skill strategy	Employment and skill strategy	N/A
	Considerate Construction Scheme	N/A
Design	Retention of architect	N/A
S106 monitoring fees	5 per cent of the total value of all contributions; and A fixed charge to manage non-monetary obligations of £350 per head of term	

## **11. Public Sector Equality Duty**

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

## **12. Conclusion**

- 12.1. The starting point for the determination of any planning application is the development plan. Paragraph 11(c) of the NPPF provides development proposals which accord with an up to date development plan should be approved without delay, and 11 (d) of the NPPF states that where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, planning permission should be granted unless "the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed".
- 12.2. It is considered the application proposes a high-quality employment development on existing underutilised, sustainable brownfield land within the highly sustainable location within designated SIL, which is consistent with the objectives of the adopted planning policy. The applicant has engaged with the LPA in undertaking extensive pre-application advice inclusive of the development being presented to the Enfield Design Review Panel. The pre-application process involved the applicant considering design options to determine the most appropriate forms of development, and the scheme proposed has followed a design-led approach to site optimisation, as per London Plan Policy D3.
- 12.3. The massing and layout of the proposed buildings have been sensitively designed to minimise impacts on the heritage assets and townscape. Given the incorporation of the lower CBS buildings fronting Southbury Road with high quality materials and detailed façade treatment, together with the delivery of substantial public realm and landscape improvements to Southbury Road, including a new station square and a new tree-lined frontage, on balance, the proposal would not result in a harm on the immediate setting of the Grade II listed 'Ripaults Factory' and Locally Listed Southbury Station.
- 12.4. The proposed scheme would result in some adverse and noticeable reductions in daylight to some residential properties on Poppy Drive. However, consideration should be given to the particular design characteristics and internal layouts of these residential properties, to the fairly minimal existing massing on the Application site, which is unusual in an urban context, and to the SIL designation of the Application Site where industrial intensification is supported by the London Plan. It is also reasonable to consider the identified effects alongside the planning merits of the scheme overall. The proposal would not result in adverse impact on the sunlight and overshadowing. In conclusion, Officers consider that when balancing the overall impact of the scheme in terms of daylight, sunlight and overshadowing with the many planning benefits that the scheme would deliver, the overall balance weighs in favour of the proposal. The proposal would not result in any adverse impact on the neighbouring amenities in terms of noise, light spill and solar energy generation.

- 12.5. In addition, as well as being low carbon, energy efficient, sustainable and safe, care has been given to ensure that the proposal would not harm the trees with significant amenity value and local wildlife. Sustainable drainage, landscape and biodiversity enhancement would be secured including 193 new trees, 718m of native hedgerow, green walls and green roofs which would achieve an Urban Greening Factor of 0.22 and Biodiversity Net Gain of 442.65% (area based) and 100% (linear based). There is also no adverse effect on the free flow and safety of traffic or highway safety. Sustainable modes of transport will also be promoted.
- 12.6. It is concluded that the development for reasons set-out within this report, is acceptable and broadly accords with the policies of the Development plan where they are material to the development and other relevant material planning considerations including emerging policy. Subject to the appropriate mitigations as set out within the recommended condition schedule, and within the Section 106 Agreement, the application is recommended for approval.





**KEY**

Application Boundary  
 4.75 [ha] / 11.74 [acres]

Project File	Southbury Road Logistics Hub		
	345 SOUTHBURY RD EN1 1TW ENFIELD		
Client	BL Logistics Investment Limited		
Status	Planning		
Scale	1:1250	Drawing Size	A3
Date	10.03.23	Drawn By	AS
		Checked	JW

Rev	Date	Description	Rev'd By	Chk'd By

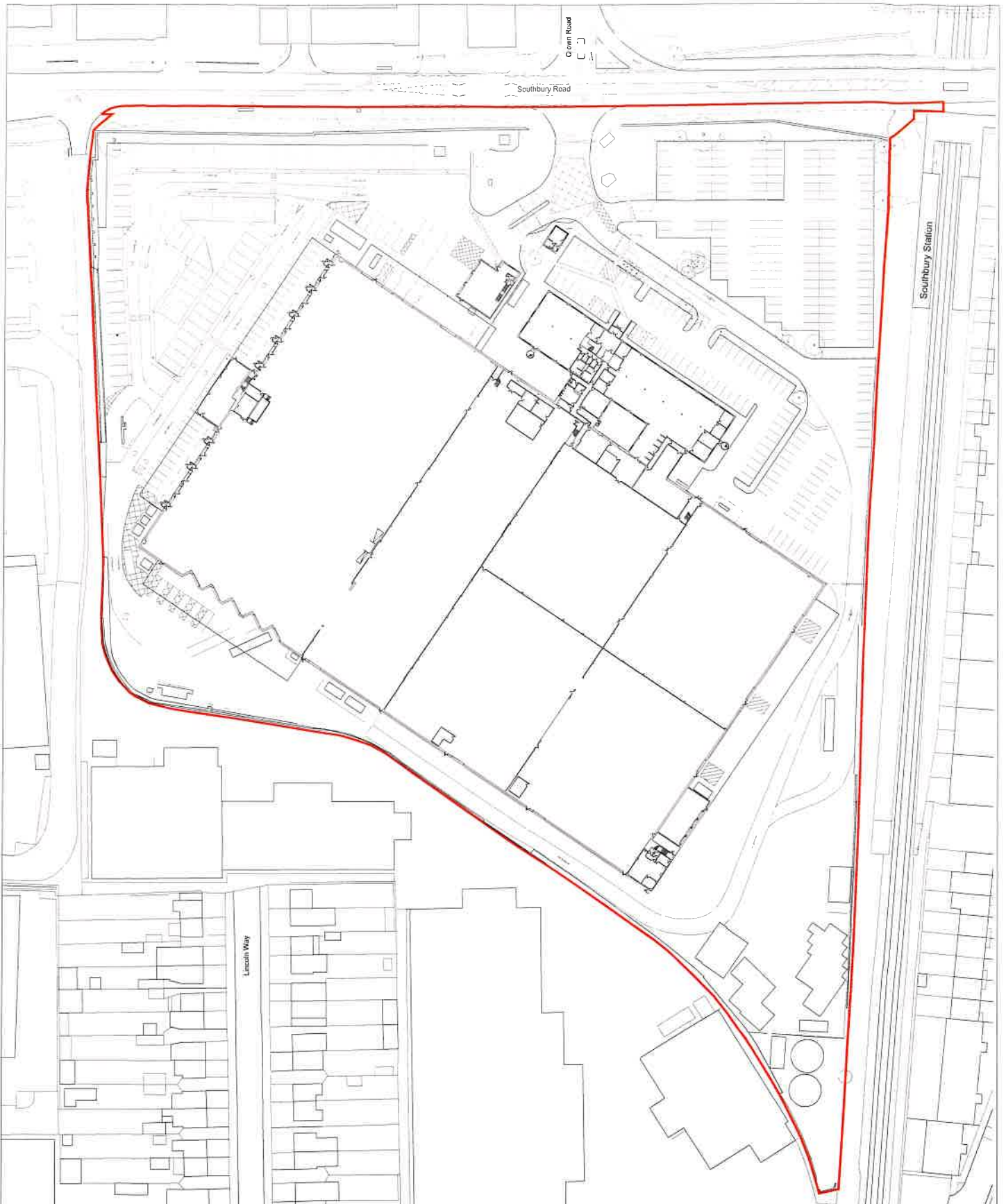
Drawing Title: **Site Location Plan**

Job/Dwg No: **17531-100**      Rev: -

- 2 St. Johns North, Wakefield, WF1 3QA, 01924 291800
- Carvers Warehouse, 77 Dale Street, Manchester, M1 2HG, 0161 2388555
- The Old Rectory, 79 High Street, Liverpool, L3 1JF, 0151 211577
- 131 London Road, Reading, RG1 1JY, 0118 9507700
- 10 Great Court, St Christophers Place, London, W1U 1JJ, 0207 4091215



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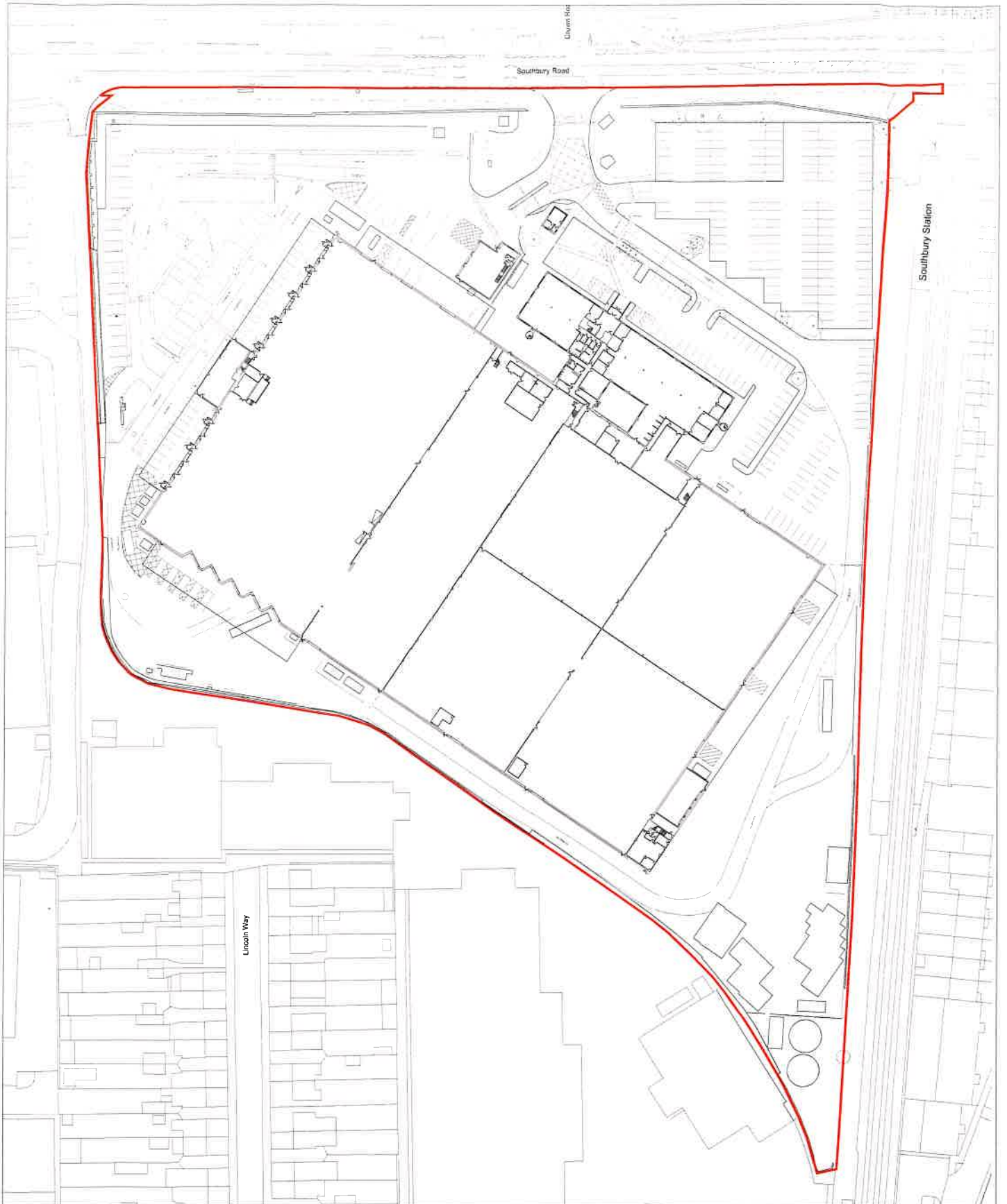
**KEY:**  
— Redline: Application Site Boundary

Note:  
 Drawn to received topographical and measured building survey information by Greenhatch Group Surveyors

Project Name	Southbury Road Logistics Hub
Client	Heritage House Southbury Enfield EN1 1TP
Client Contact	Bl Logistics Investment Limited
Project Type	Planning
Scale	1:500
Date	10.03.2023
Drawn by	JGR
Checked by	JW

Project No.	17531 - 101
Project Name	Existing Block Plan
Project Location	Southbury Road, Enfield, Middlesex, EN1 1TP
Project Status	Approved
Project Date	10.03.2023
Project Author	JGR
Project Checker	JW
Project Approver	

**THE HARRIS GROUP**  
 PLANNING & ARCHITECTURE



Lincoln Way

Southbury Road

Southbury Station

Lincoln Way



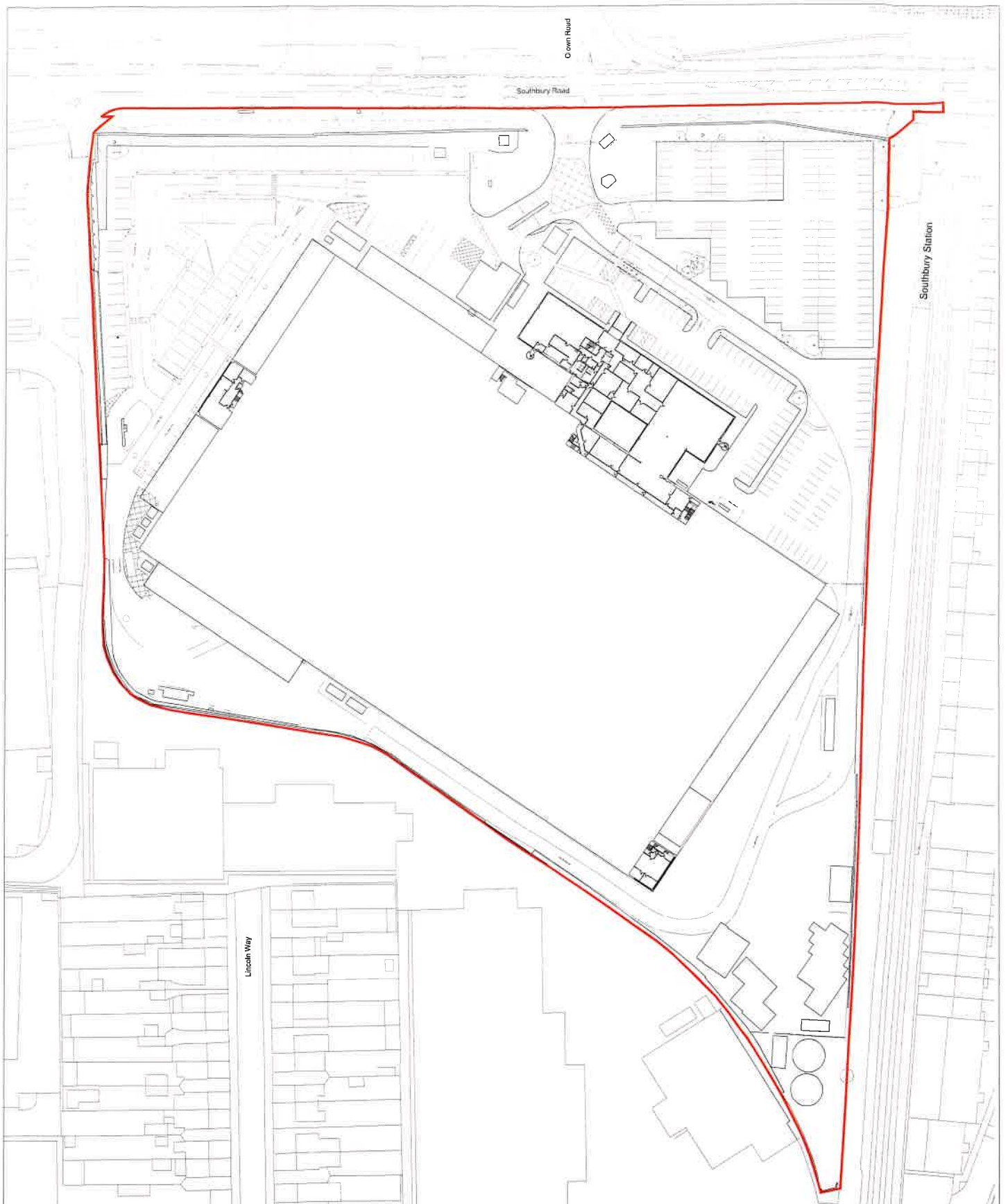
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**Note:**  
 Drawn to received topographical and measured building survey information by Greenhatch Group Surveyors

Project	Southbury Road Logistics Hub	Drawing No.	Existing Ground Floor Plan
Client	Heritage House Southbury Enfield BN1 1JH	Drawing Title	17531 - 102
Owner	BL Logistics Investment Limited	Scale	1:500
Discipline	Planning	Author	JPR
Scale	1:500	Check	AW
Date	10.03.2023	Drawn By	JPR



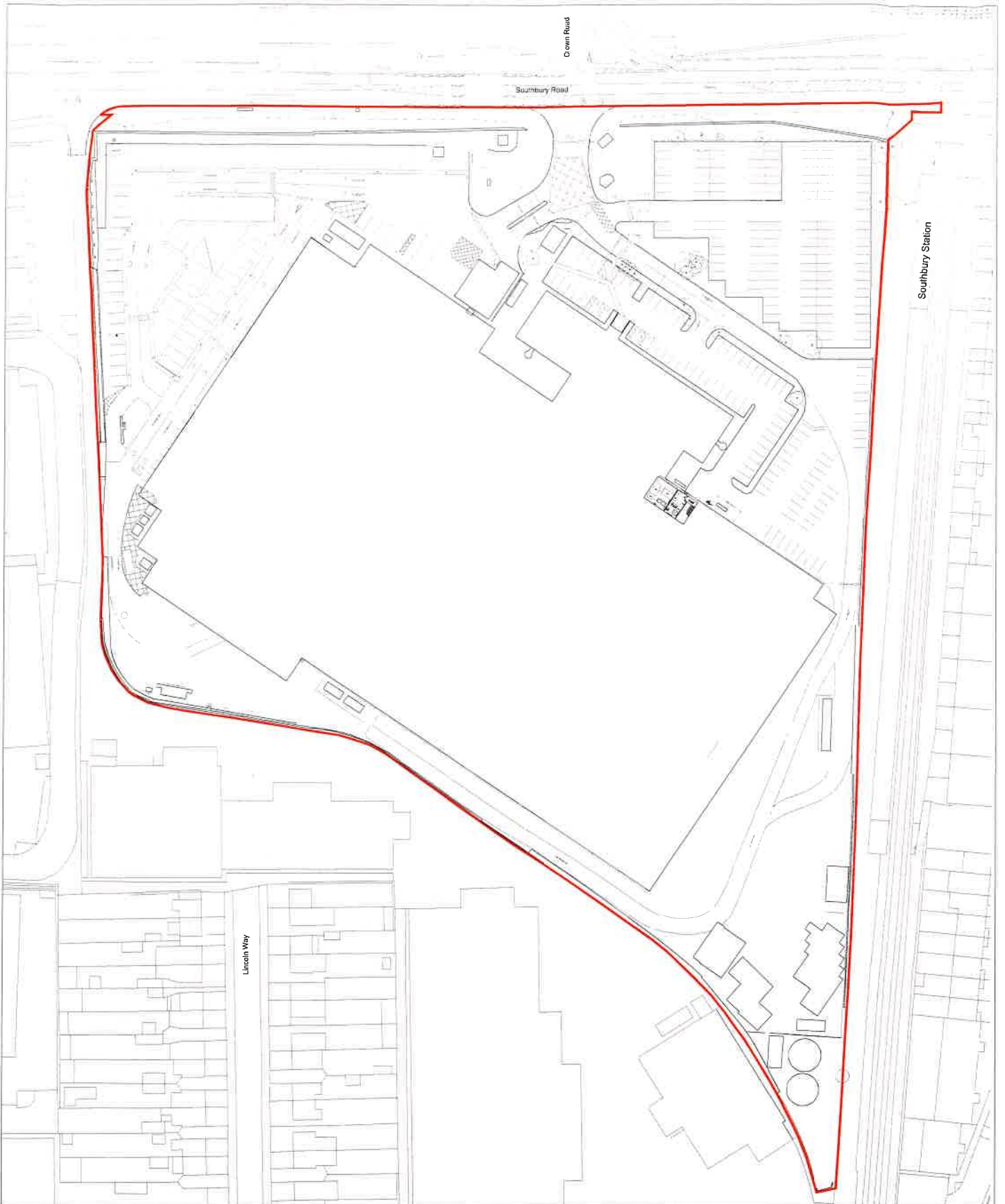




**KEY:**  
 Redline: Application Site Boundary

**Note:**  
 Drawn to received topographical and measured building survey information by Greenlight Group Surveyors.

<b>Project</b> Southbury Road Logistics Hub Heritage House Southbury Enfield EN1 1NP		<b>Drawing No.</b> Existing First Floor Plan <b>17531 - 103</b>	
<b>Client</b> BL Logistics Investment Limited		<input type="checkbox"/> 1:100 <input type="checkbox"/> 1:200 <input type="checkbox"/> 1:500 <input type="checkbox"/> 1:1000 <input type="checkbox"/> 1:2000 <input type="checkbox"/> 1:5000 <input type="checkbox"/> 1:10000	
<b>Planning</b> 1:500		<input type="checkbox"/> 1:100 <input type="checkbox"/> 1:200 <input type="checkbox"/> 1:500 <input type="checkbox"/> 1:1000 <input type="checkbox"/> 1:2000 <input type="checkbox"/> 1:5000 <input type="checkbox"/> 1:10000	
<b>Date</b> 10.03.2023	<b>Drawn by</b> JZB	<b>Checked by</b> JWB	



**KEY:**  
— Redline: Application Site Boundary

Note:  
 Drawn to received topographical and measured building survey information by Greenhalgh Group Surveyors.

Project No	Southbury Road Logistics Hub	Sheet No	17531 - 104
Client	17531 - 104	Scale	1:500
Drawn by	SI Logistics Investment Limited	Checked by	GP
Date	10 03 2023	Scale	A3
Project Name	Southbury Road Logistics Hub	Sheet Title	Existing Separated Floor Plan
Scale	1:500	Scale	1:500
Date	10 03 2023	Scale	1:500
Project Name	Southbury Road Logistics Hub	Sheet Title	Existing Separated Floor Plan
Scale	1:500	Scale	1:500
Date	10 03 2023	Scale	1:500





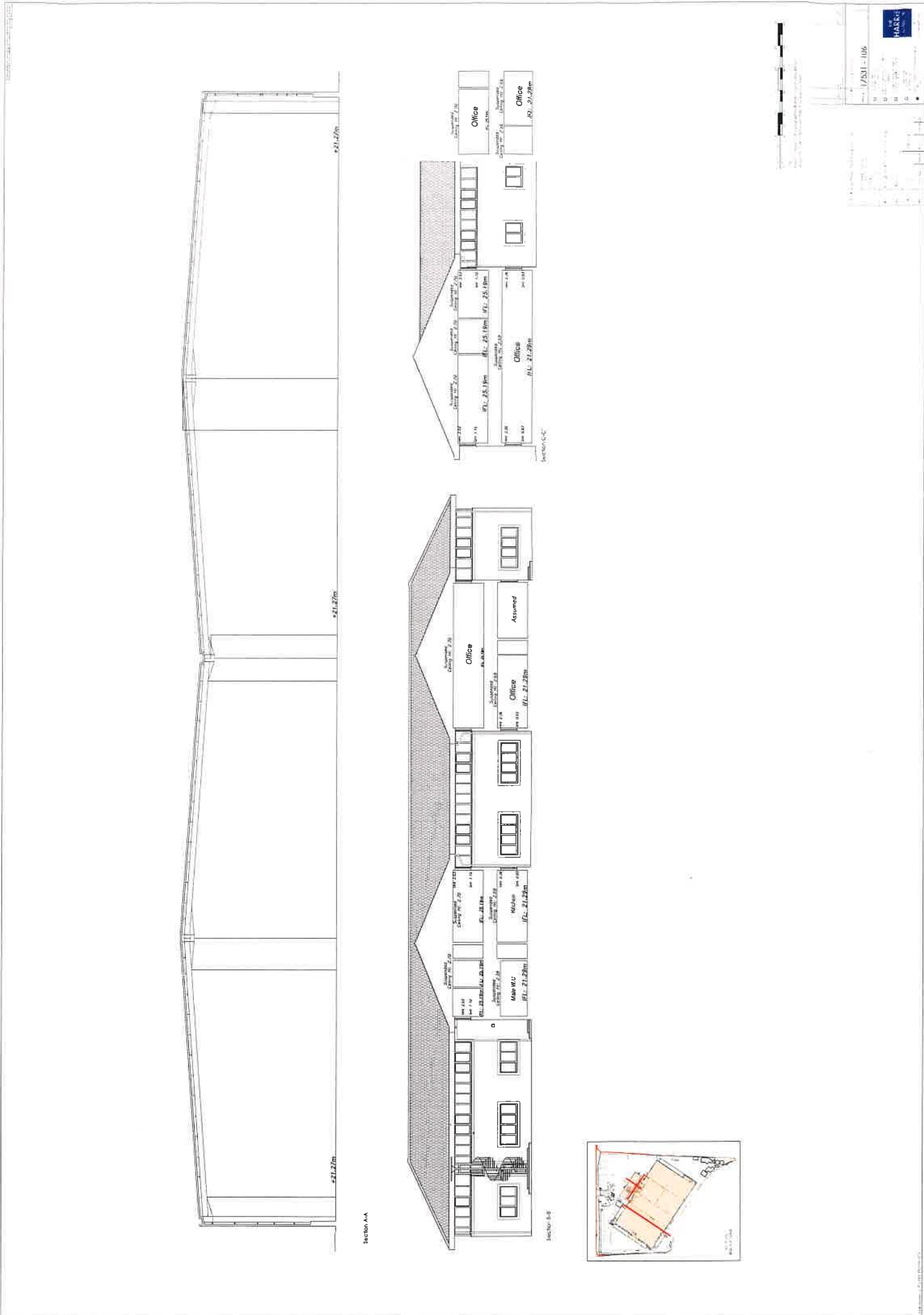
**KEY:**  
— Redline: Application Site Boundary

Note:  
 Drawn to received topographic of area measured building  
 survey information by Greenhalgh Group Surveyors

Project No	Southbury Road Logistics Hub	Drawing No	Existing Pool Plan
Client	Heritage House Southbury Enfield EN1 1NP	Reference	17531 - 105
Design	BL Logistics Investment Limited	Scale	1:500
Discipline	Planning	Author	AV
Date	10 03 2023	Check	JW





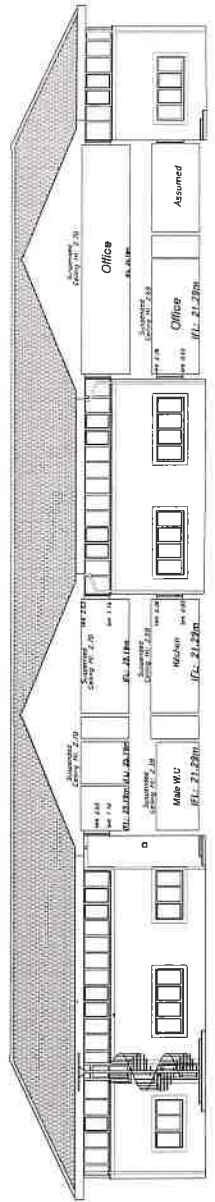


±31.17m

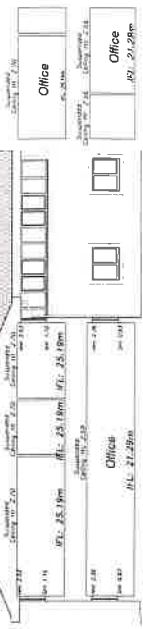
±21.87m

±21.27m

Section A-A



Section B-B



Section C-C



Project: / JSU - 106

Scale: 1:50

Author: [Name]

Date: [Date]

Client: [Name]

Architect: [Name]

Engineer: [Name]

Structural Engineer: [Name]

Electrical Engineer: [Name]

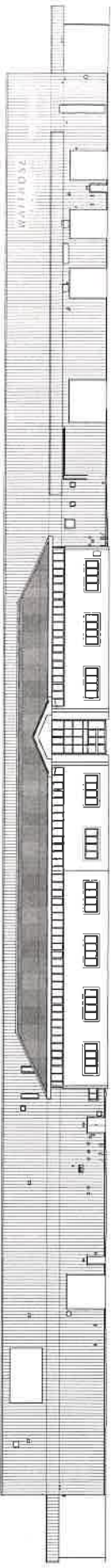
Mechanical Engineer: [Name]

Sanitary Engineer: [Name]

Other: [Name]

Professional Seal: [Name]

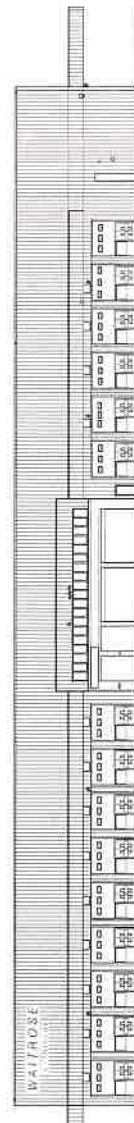




1 - Elevation



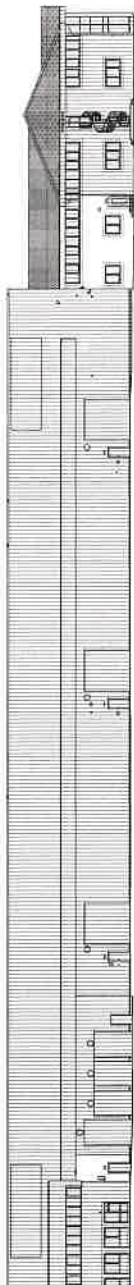
3 - Elevation



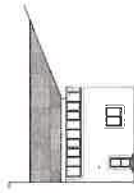
2 - Elevation



5 - Elevation



4 - Elevation



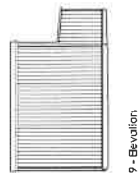
6 - Elevation



7 - Elevation



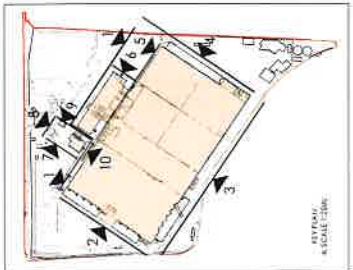
8 - Elevation



9 - Elevation



10 - Elevation



BYWAY  
SCALE 1:500

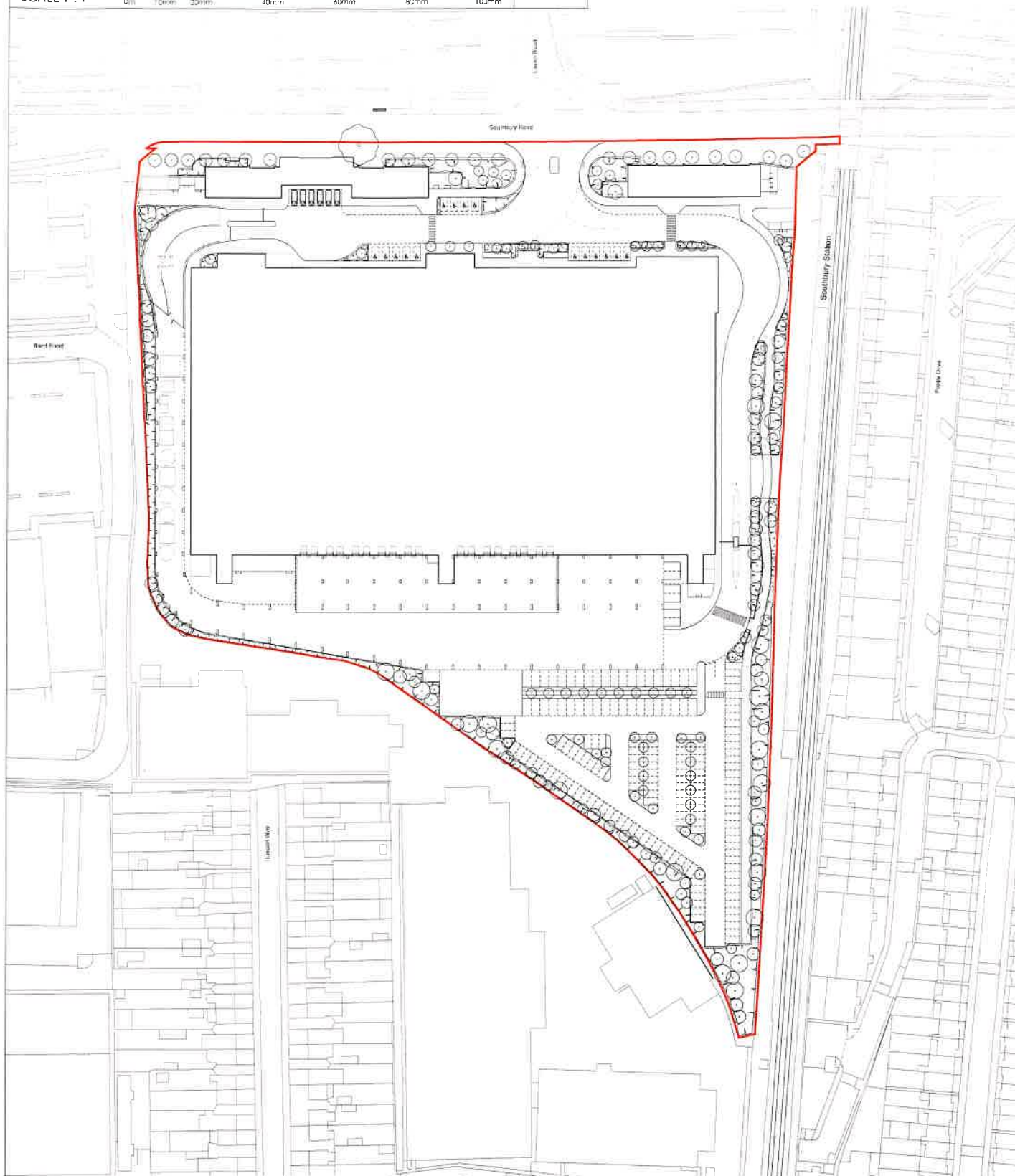


Note:  
Drawn to received topographical and measured building  
survey information by Greenmatch Group Surveyors

17531 - 107

17531 - 107





**KEY**

— Application Boundary  
4.75 [ha] / 11.74 [acres]

Rev	30.06.23	Amendments to cycle parking	AV	JW
Rev	22.03.23	Amendments to Landscaping	AV	JW
Rev	Date	Description	Rev By	Chk'd By

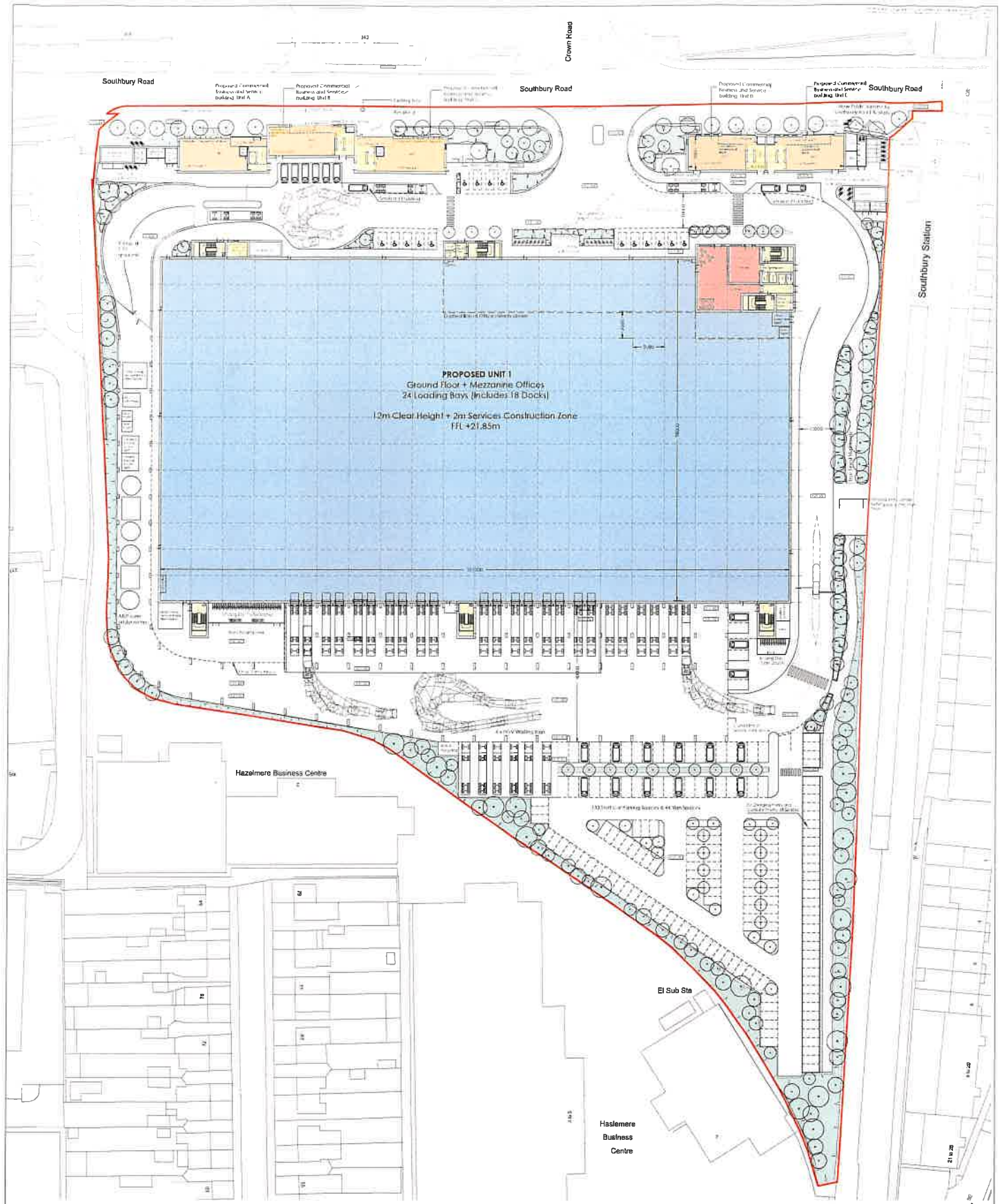
Project file	Southbury Road Logistics Hub		
	345 SOUTHURY RD EN1 1TW ENFIELD		
Client	BL Logistics Investment Limited		
Stage	Planning		
Scale	1:1250	Drawing Size	A3
Date	10.03.2023	Drawn By	AS
		Checked	JW

Drawing file	Proposed Block Plan	
Job-Dwg file	17531-119	Rev B

- 231 Johns North, Wakefield, WF3 3QA, T. 01924 291800
- Carvers Warehouse, 77 Dale Street, Manchester, M1 2HG, T. 0161 2386355
- The Old Rectory, 79 High Street, Leyport, Fagball, MK16 8AB, T. 01908 211577
- 101 London Road, Reading, RG1 3BY, T. 0118 9307700
- 10 Green Court, St Christophers Place, London, W1U 1J, T. 0207 4291215







KEY:	
Parking	145 spaces (incl. 15 Acc.)
Car Sharing Priority	5% allocation (8 spaces)
EVC	20% allocation (30 spaces)
Van Parking	52 spaces
Bicycle Parking	193 spaces (incl. 10 Acc.)
Docks	24 Loading Docks (18 docks @ level doors)
— Boundary Application Extent	
HDV Vehicle: 9.3m long turn	
HDV Vehicle Turning Space	

	Logistics Space
	Circulation Space
	Office Space
	Commercial Business and Service Buildings
	Amenity Space (not shown on plan)

Note: Entrance to offices, subject to tenants requirements and detailed design. Cares to be shared, access controlled. Columns indicative, subject to structural engineers advice.

SCALE 1:500 0m 10m 20m 30m

SCALE 1:1 0m 10m 20m 30m

Southbury Road Logistics Hub

Heritage House  
Southbury Road  
Enfield  
BN1 1NP

BL Logistics Investment Limited

Planning

1:500

10/03/2023

17531 - 120

THE HARRIS PARTNER™

Southbury Road

Proposed Commercial, Business and Service building, Unit A

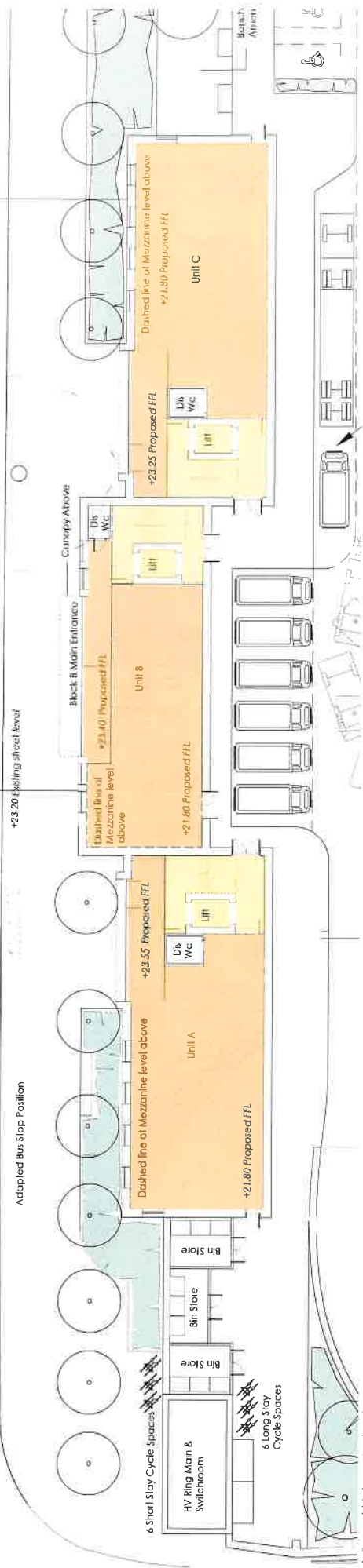
Proposed Commercial, Business and Service building, Unit B

Proposed Commercial, Business and Service building, Unit C

Adapted Bus Stop Position

+23.20 Existing street level

Existing Tree to Be Retained

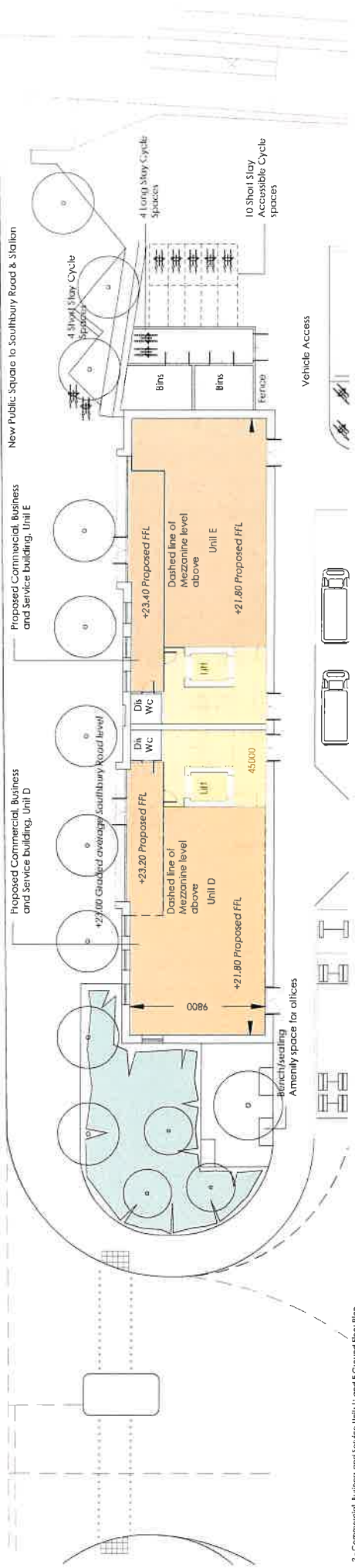


1 - Commercial, Business and Service Units A, B and C Ground Floor Plan

New Public Square to Southbury Road & Station

Proposed Commercial, Business and Service building, Unit D

Proposed Commercial, Business and Service building, Unit E



2 - Commercial, Business and Service Units D and E Ground Floor Plan

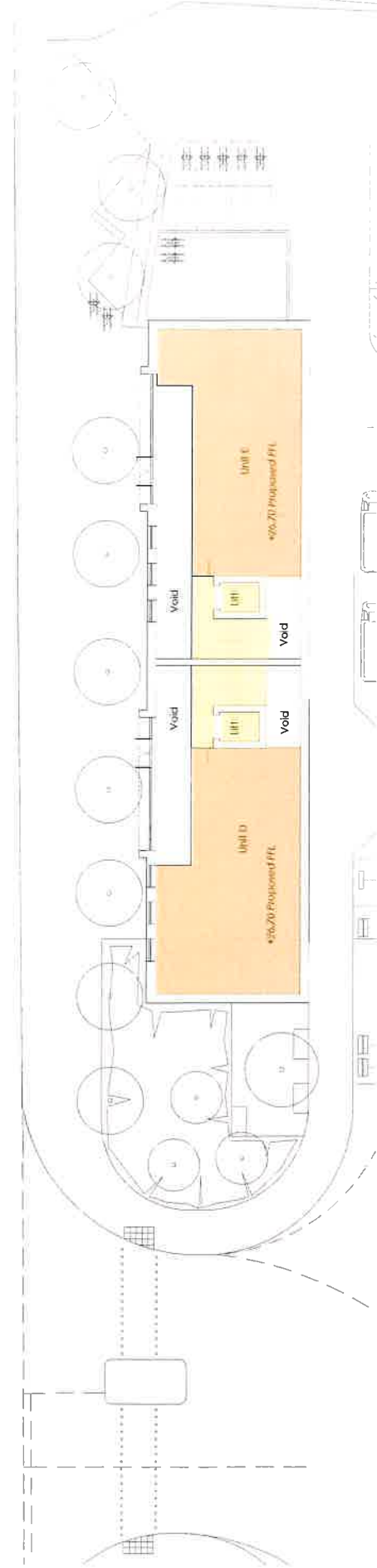


Symbol	Description
(Blue box)	High Pressure Water
(Green box)	Gas
(Yellow box)	Low Pressure Water
(Orange box)	Other Utility
(Red box)	Proposed Building
(Green dashed line)	Proposed Building with a Mezzanine Level
(Blue dashed line)	Proposed Building with a Mezzanine Level
(Red dashed line)	Proposed Building with a Mezzanine Level
(Blue dashed line)	Proposed Building with a Mezzanine Level
(Red dashed line)	Proposed Building with a Mezzanine Level
(Blue dashed line)	Proposed Building with a Mezzanine Level
(Red dashed line)	Proposed Building with a Mezzanine Level
(Blue dashed line)	Proposed Building with a Mezzanine Level
(Red dashed line)	Proposed Building with a Mezzanine Level
(Blue dashed line)	Proposed Building with a Mezzanine Level
(Red dashed line)	Proposed Building with a Mezzanine Level
(Blue dashed line)	Proposed Building with a Mezzanine Level
(Red dashed line)	Proposed Building with a Mezzanine Level
(Blue dashed line)	Proposed Building with a Mezzanine Level
(Red dashed line)	Proposed Building with a Mezzanine Level

Southbury Road



1 - Commercial business and service Units A, B and C. Mezzanine floor plan.



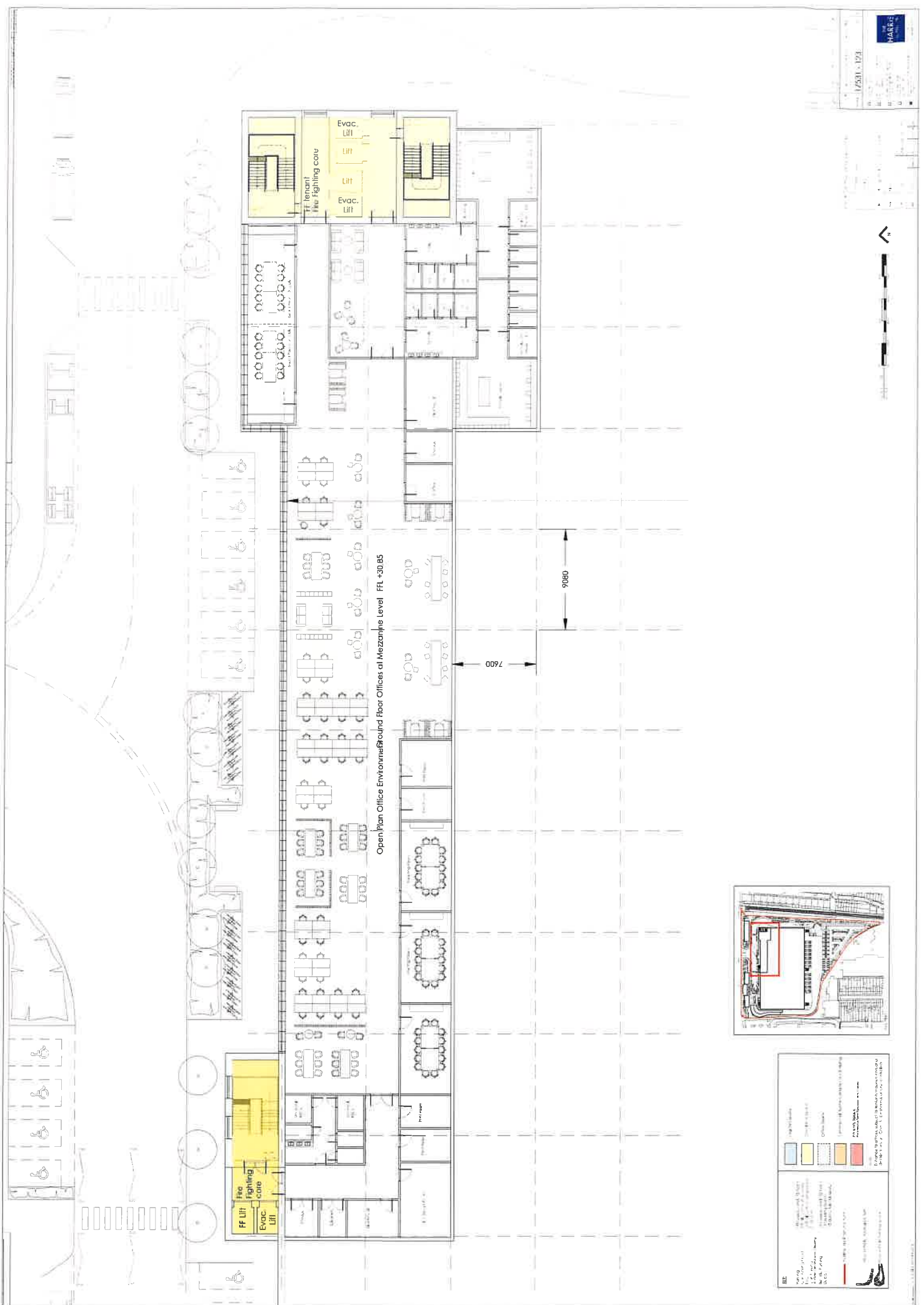
2 - Commercial, business and service Units D and E. Mezzanine floor plan.



LEG	Symbol	Description
1	[Blue box]	1st Floor
2	[Orange box]	2nd Floor
3	[Green box]	3rd Floor
4	[Yellow box]	4th Floor
5	[Purple box]	5th Floor
6	[Red box]	6th Floor
7	[Grey box]	Roof
8	[White box]	Void
9	[Black box]	Structure
10	[Dotted line]	Proposed
11	[Solid line]	Existing
12	[Circle]	Column
13	[Square]	Beam
14	[Triangle]	Stair
15	[Diamond]	Lift
16	[Star]	Core
17	[Hexagon]	Shaft
18	[Octagon]	Service
19	[Circle with dot]	Water
20	[Square with dot]	Electric
21	[Triangle with dot]	Gas
22	[Diamond with dot]	Telecom
23	[Star with dot]	Other



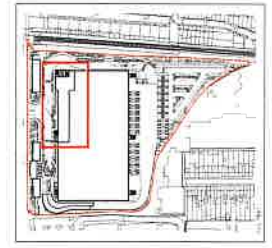




Open Plan Office Environment Round Floor Offices at Mezzanine Level FFL +30.85

9000

7600

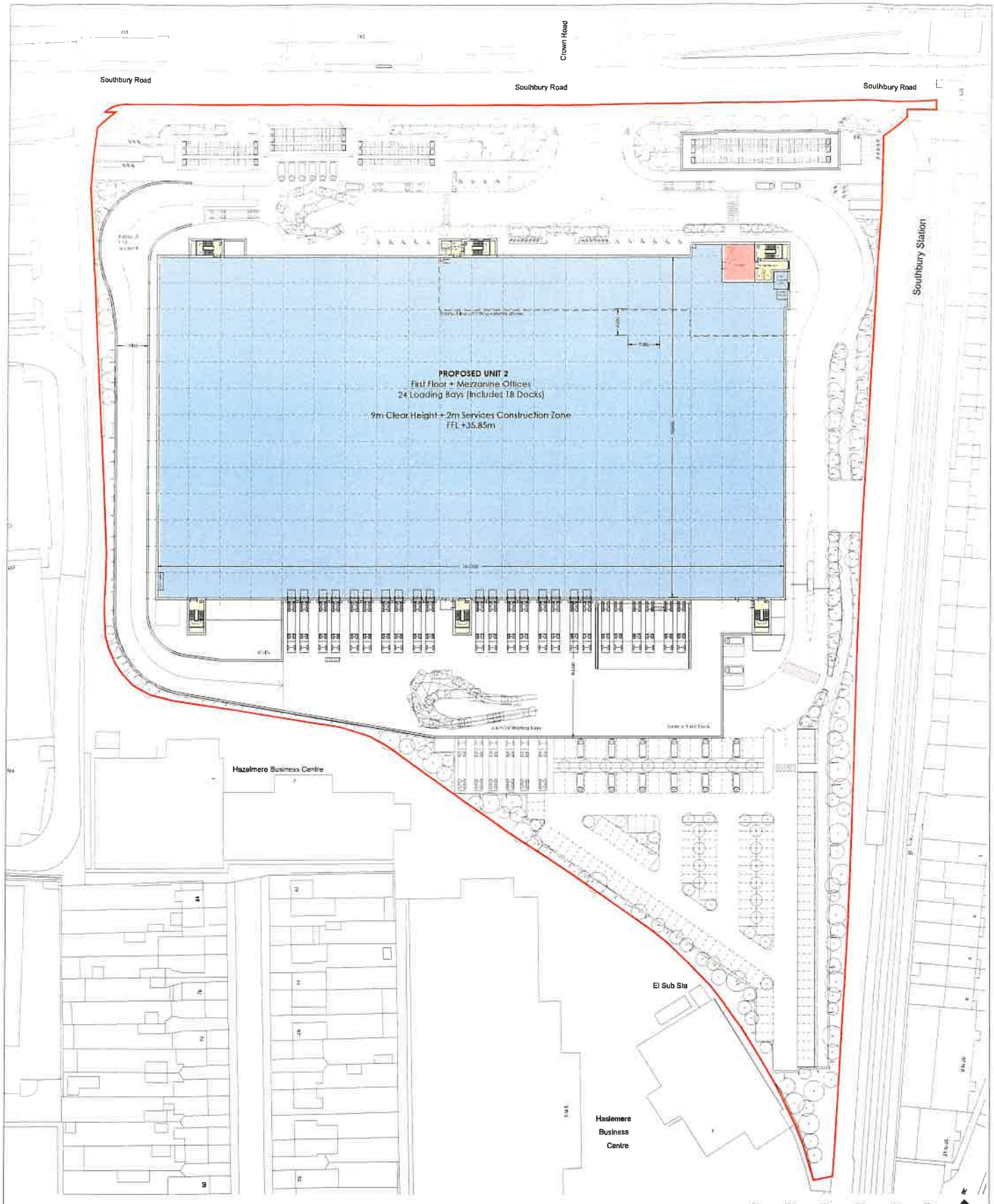


**LEG**

- FF Tenant Fighting Core
- Evac. Lift
- FF Lift
- Other Rooms
- Open Office
- Private Office
- Meeting Room
- Reception
- Storage
- Restroom
- Breakroom
- Janitor
- Other

**MARK 22**

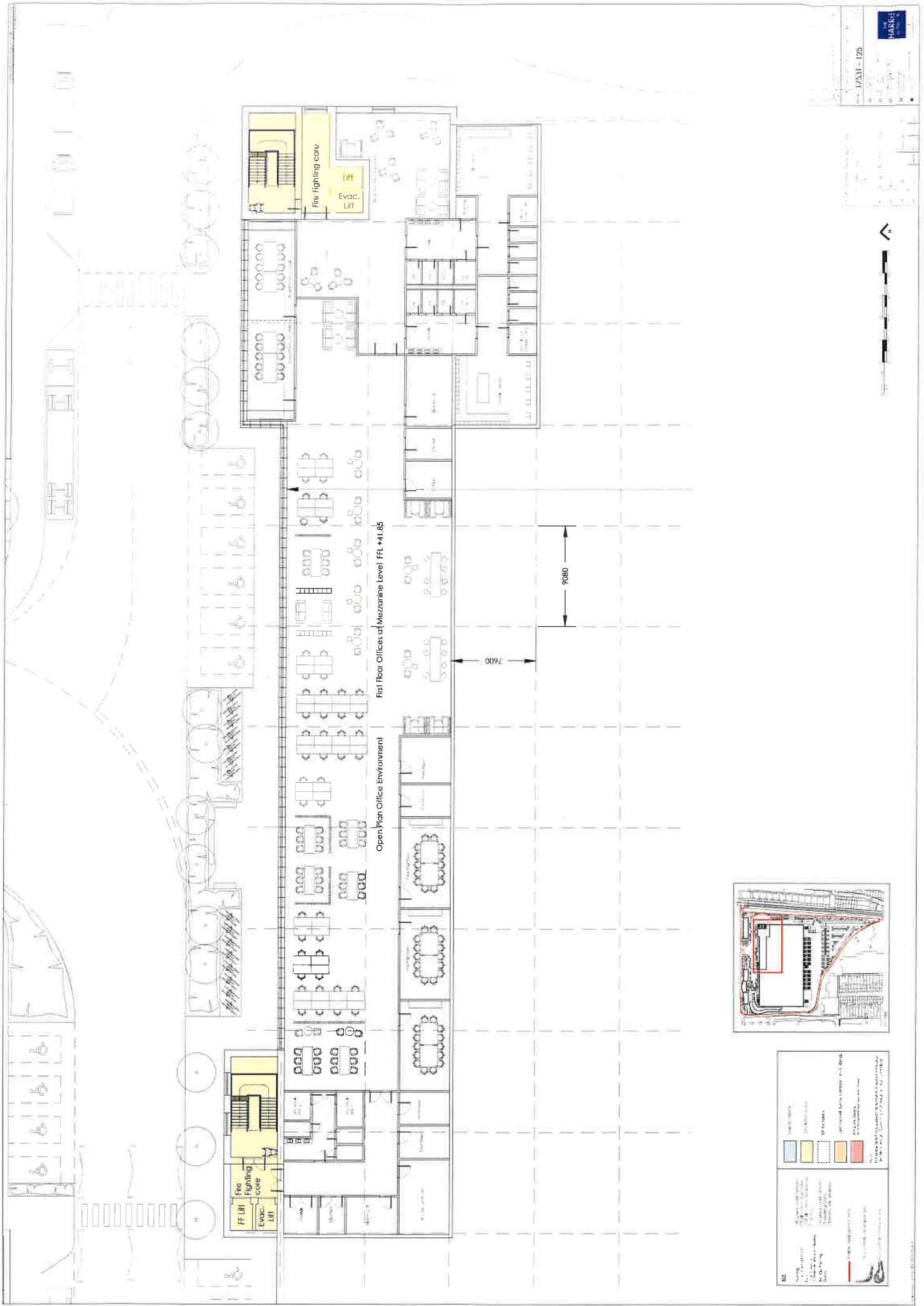
1/23/11 12:13



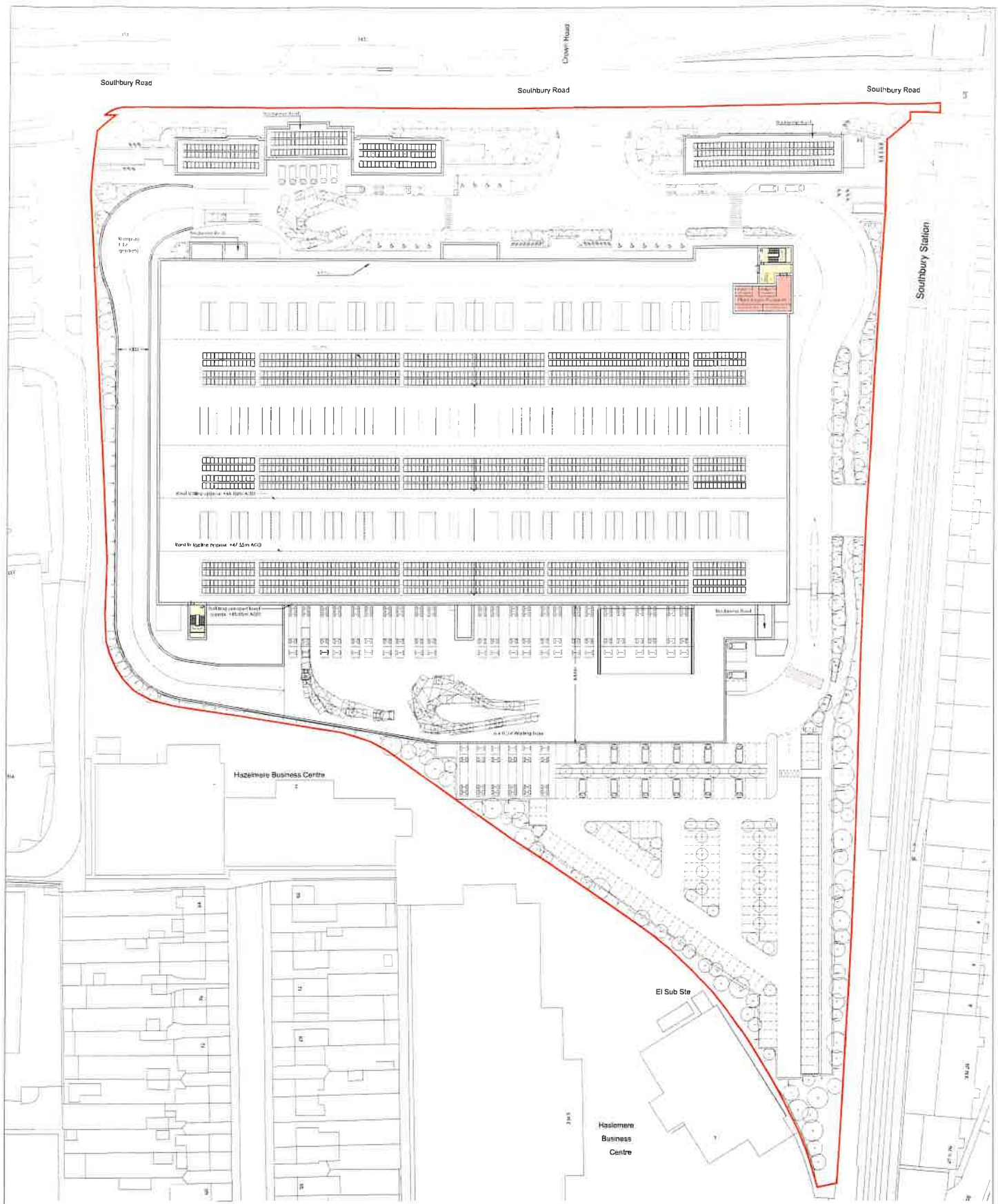
KEY:	
Parking	145 spaces (incl. 15 Acc.)
Car Sharing Priority	5% allocation (8 spaces)
EVC	20% allocation (30 spaces)
Van Parking	52 spaces
(Electric charging service-library)	
Bicycle Parking	193 spaces (incl. 10 Acc.)
Docks	24 Loading Docks (18 docks, 6 level doors)
Redline Application Extents	
HGV Vehicle, 90 degree turn	
HGV Vehicle Turning Space	
	Logistics Space
	Circulation Space
	Office Space
	Commercial Business and Service Buildings
	Amenity Space (incl. amenity, gym, cafe, etc.)
<b>Note:</b> Entrance to office, subject to tenancy requirements and detailed design. Core to be in red. Access controlled. Colours indicative, subject to structural engineers advice.	

Project No.	Southbury Road Logistics Hub	Revision	Proposed 2nd Floor Plan
Client	Heritage House Southbury Road SNI INP	Reference	17531 - 124
Drawn	BL Logistics Investment Limited	Scale	<input type="checkbox"/> 1:500 <input type="checkbox"/> 1:1000 <input type="checkbox"/> 1:2000 <input type="checkbox"/> 1:5000 <input type="checkbox"/> 1:10000 <input type="checkbox"/> 1:20000 <input type="checkbox"/> 1:50000 <input type="checkbox"/> 1:100000 <input type="checkbox"/> 1:200000 <input type="checkbox"/> 1:500000 <input type="checkbox"/> 1:1000000
Issue	1 500	Drawing No.	A1
Date	10.03.23	Project No.	17531



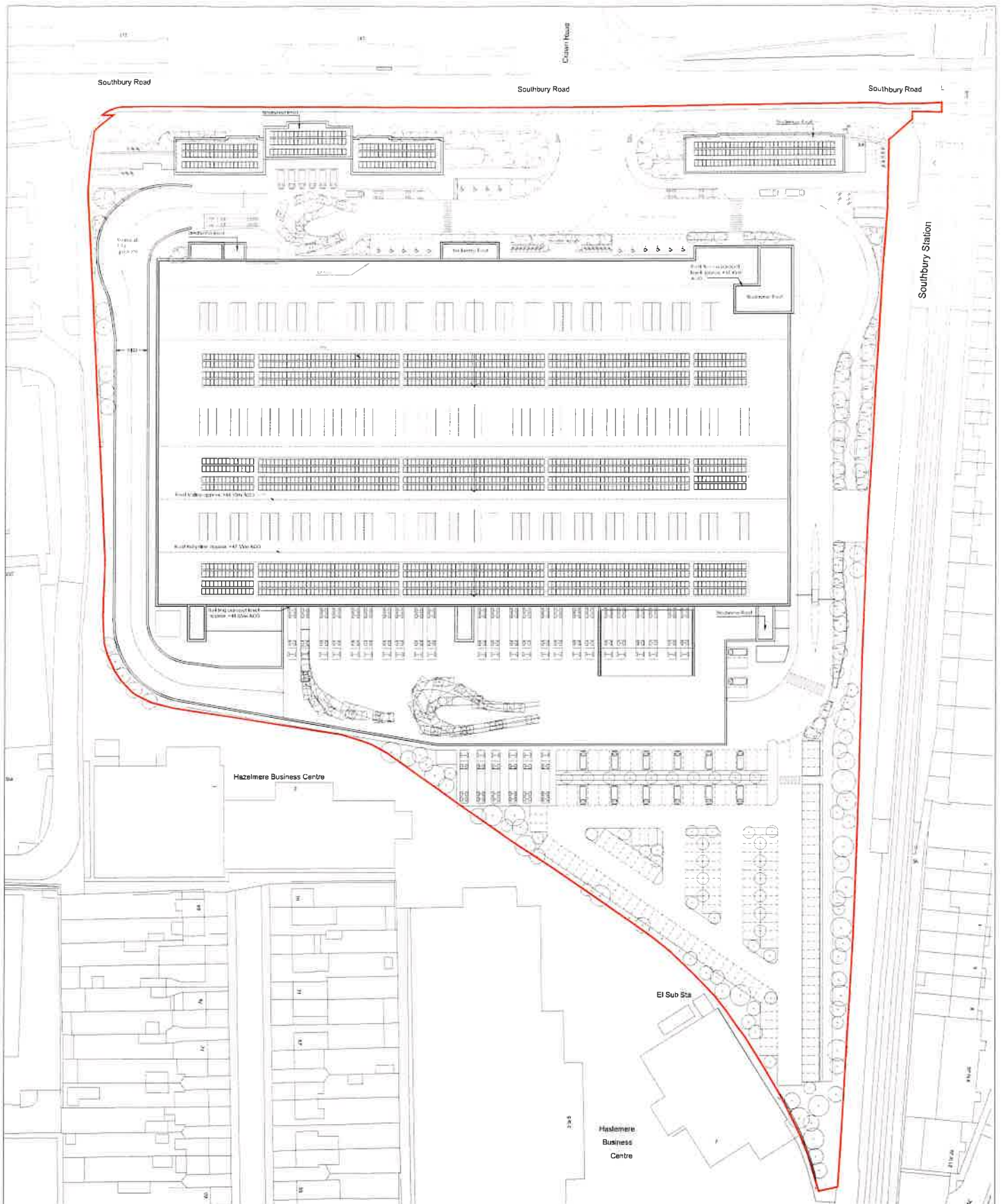






KEY:	
Parking	145 spaces (incl 15 Acc)
Car sharing Priority	58% allocation (8 spaces)
EVC	20% allocation (30 spaces)
Van Parking	52 spaces
Bicycle Parking	193 spaces (incl 13 Acc)
Docks	24 Loading Docks (18 docks, 6 level doors)
Redline Application Extent	
HDV Vehicle: 90 degree turn	
HDV Vehicle Turning Space	
	Logistics Space
	Circulation Space
	Office Space
	Commercial, Business and Service Buildings
	Amenity Space
NOTE: Entrance to offices, subject to tenants requirements, and detailed design. Coves to be in-situ, access controlled	

Southbury Road Logistics Hubs Heritage House Southbury Road SNI INP	Proposed Road Layout 17531 - 126
BL Logistics Investment Limited Planning 1:500 13/03/23	



**KEY:**

Parking	145 spaces (incl. 15 Acc.)	Logistics Space
Car Sharing Priority	5% allocation (8 spaces)	Circulation Space
EVIC	20% allocation (30 spaces)	Office Space
Van Parking	100% allocation (50 spaces)	Commercial, Business and Service Buildings
Bicycle Parking	193 spaces (incl. 13 Acc.)	Amenity Space
Docks	24 Loading Docks (18 docks & level doors)	

Final Application Extent

HGV Vehicle: 70 degree turn

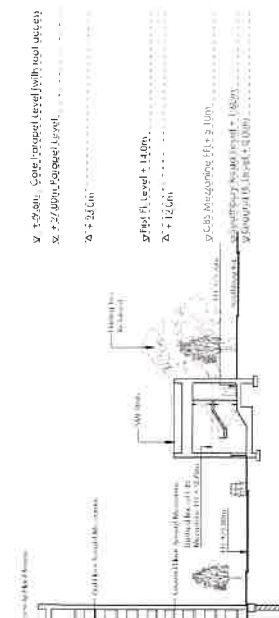
HGV Vehicle Turning Space

Note: Entrance to offices, subject to tenant's requirements and detailed design. Cares to be shared, access controlled.

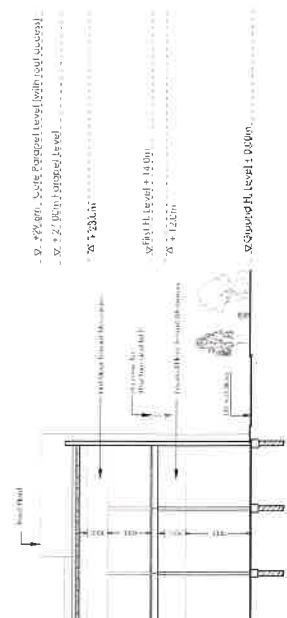


Project Name	Southbury Road Logistics Hub	Project Ref	17531 - 127
Client	Heritage House Southbury Road Griffiths SNI INP	Project Location	Southbury Road, Southbury, Dublin 12
Client Ref	HL Logistics Investment Limited	Project Status	Planning
Scale	1:500	Project No.	10 23 23
Date	10 23 23	Project Stage	IP

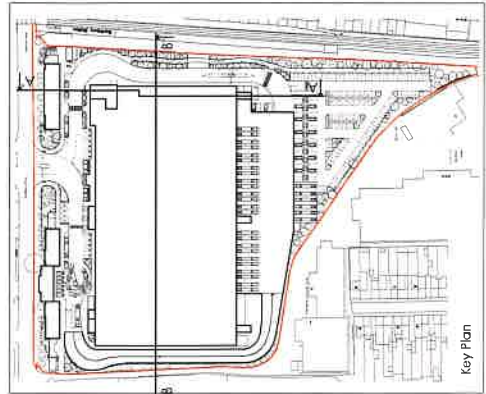




Core Parapet Level  
 Δ + 28.60m (with roof access)  
 Δ + 27.00m (Parapet Level)  
 Δ + 23.0m  
 Δ 1st Floor Mezzanine + 20.0m  
 Δ 1st Floor Level + 14.0m  
 Δ + 12.0m Structure and Service Zone  
 Δ Ground Floor Mezzanine + 9.0m  
 Δ Core Mezzanine F1 + 5.10m  
 Δ Southbay Road Level + 1.20m  
 Δ Ground Floor Level + 0.00m



Core Parapet Level  
 Δ + 28.60m (with roof access)  
 Δ + 27.00m (Parapet Level)  
 Δ + 23.0m  
 Δ 1st Floor Mezzanine + 20.0m  
 Δ 1st Floor Level + 14.0m  
 Δ + 12.0m Structure and Service Zone  
 Δ Ground Floor Mezzanine + 9.0m  
 Δ Ground Floor Level + 0.00m



Key Plan

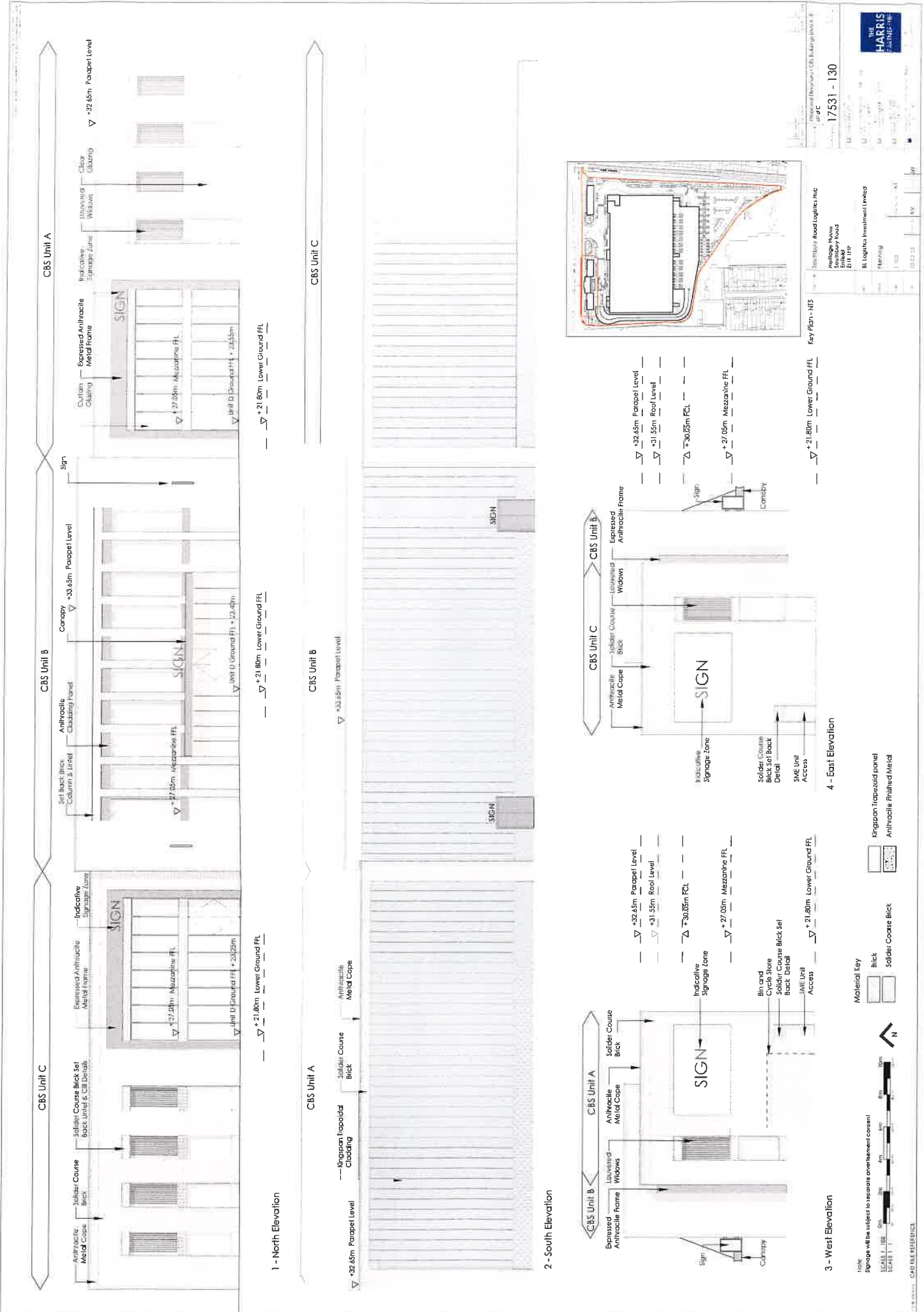
SCALE 1:500  
 SCALE 1:1

Project Title	Southbay Road Logistics Hub
Client	Heritage House Southbay Road Enfield EN1 1NP
Client	BL Logistics Investment Limited
Phase	Planning
Date	10.03.2023
Drawn by	AV
Checked by	JW
Project No.	17531 - 128
Sheet No.	A









Project: Residential Development CBS Large Block 2  
 Date: 10/03/23  
 Drawing: B. Logistics Investment Project  
 Scale: 1:100  
 Drawing No: 17531-130

Key Plan - NTS  
 Building: Road Logistics Hub  
 Drawing: B. Logistics Investment Project  
 Scale: 1:100  
 Drawing No: 17531-130

Key Plan - NTS  
 Building: Road Logistics Hub  
 Drawing: B. Logistics Investment Project  
 Scale: 1:100  
 Drawing No: 17531-130

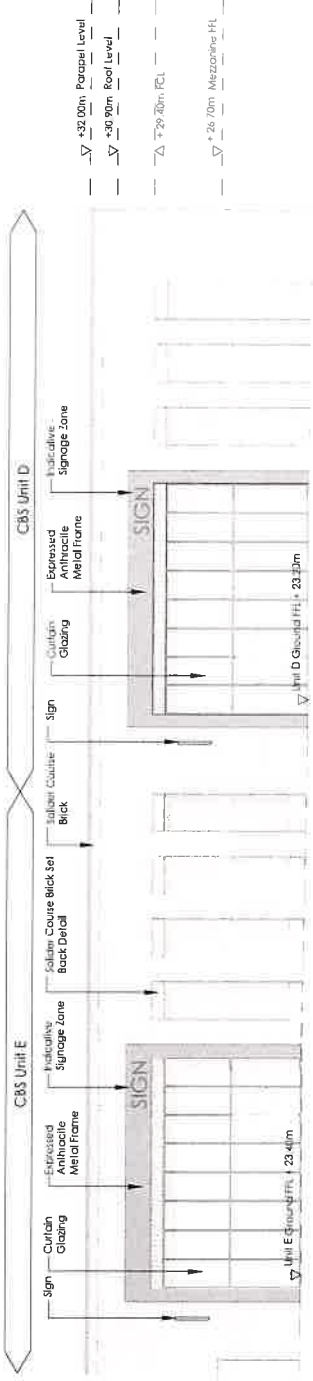
Key Plan - NTS  
 Building: Road Logistics Hub  
 Drawing: B. Logistics Investment Project  
 Scale: 1:100  
 Drawing No: 17531-130

Key Plan - NTS  
 Building: Road Logistics Hub  
 Drawing: B. Logistics Investment Project  
 Scale: 1:100  
 Drawing No: 17531-130

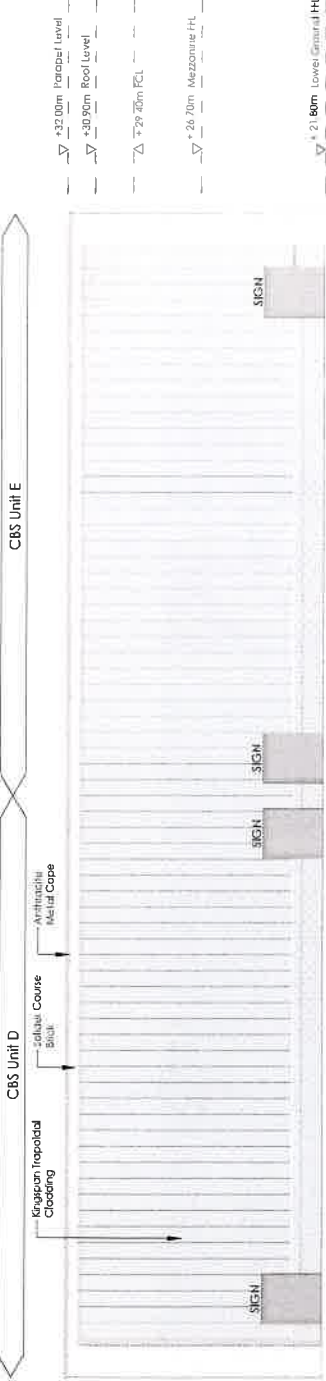
Key Plan - NTS  
 Building: Road Logistics Hub  
 Drawing: B. Logistics Investment Project  
 Scale: 1:100  
 Drawing No: 17531-130

Key Plan - NTS  
 Building: Road Logistics Hub  
 Drawing: B. Logistics Investment Project  
 Scale: 1:100  
 Drawing No: 17531-130

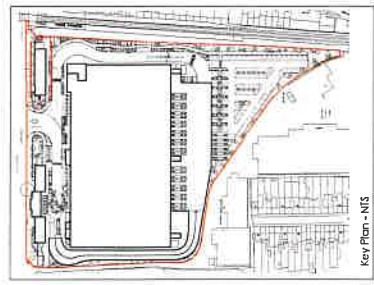
Key Plan - NTS  
 Building: Road Logistics Hub  
 Drawing: B. Logistics Investment Project  
 Scale: 1:100  
 Drawing No: 17531-130



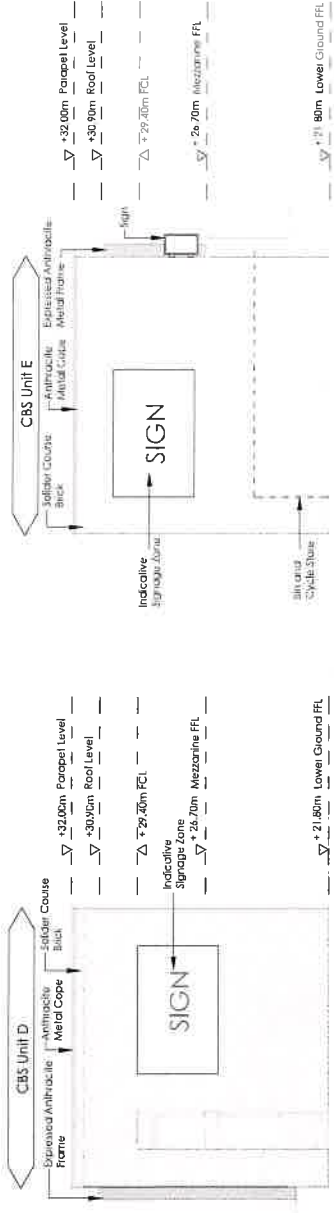
1 - North Elevation



2 - South Elevation



3 - West Elevation



4 - East Elevation

Note: Signage will be subject to separate advertisement consent



Material key

	Solidator Course Brick
	Kingspan Trapezoidal panel
	Anthraxite Finished Metal

Universal Investment Services (UK) Ltd  
 Projected Elevation  
 .../17531 - 131  
 The Harris  
 Building  
 100  
 Planning  
 BL Logistics Investment Limited