

LONDON BOROUGH OF ENFIELD		
PLANNING COMMITTEE		Date: 18 July 2023
Report of Director of Planning and Growth – Brett Leahy	Contact Officer: Karolina Grebowiec-Hall	Ward: Brimsdown
Application Number: 22/03123/VAR		Category: Major
LOCATION: 241 Green St, Enfield, EN3 7SJ		
PROPOSAL: Variation of condition 02 granted under planning application 20/01526/FUL to introduce second stairs, internal layout changes, amendments to car and bicycle parking, and to amend the type of residential accommodation and quantum of affordable housing.		
Applicant Name & Address: Stonegate Homes (Enfield) Limited		Agent Name & Address: Montagu Evans 70 St Mary Axe, London, EC3A 8BE
RECOMMENDATION: 1 That in accordance with Regulation 3 of the Town and Country Planning General Regulations 1992, subject to referral of the application to the Greater London Authority and the completion of a Deed of Variation to the original s106 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 finalise the wording of the Deed of Variation to the original s106 Agreement and agree the final wording of the conditions to cover the matters in the Recommendation section of this report.		

1. Note for Members

- 1.1 This planning application is categorised as a 'major' planning application involving more than 10 residential units. In accordance with the scheme of delegation it is reported to Planning Committee for determination.

2. Recommendation

- 2.1 That in accordance with Regulation 3 of the Town and Country Planning General Regulations 1992, subject to referral of the application to the Greater London Authority and the completion of a Deed of Variation to the original s106 Agreement to secure the matters covered in this report, the Head of Development Management be authorised to GRANT planning permission subject to conditions.

- 2.2 That the Head of Development Management be granted delegated authority to finalise the wording of the Deed of Variation to the original s106 Agreement and agree the final wording of the conditions to cover the following matters:

1. Time limit
2. Approved drawings compliance
3. Commercial space restriction
4. External finishing materials
5. Opening hours
6. Surfacing materials-
7. Landscaping details
8. Biodiversity enhancement measures
9. Operational/Service Management Plan
10. BREEAM New Construction Rating
11. Car Parking Management Plan
12. Cycle parking details
13. Electrical vehicle charging points
14. Waste details
15. Green/brown roofs
16. Water management
17. Contamination
18. Piling
19. Construction Management Plan
20. Water conservation
21. Acoustic Report
22. External lighting details
23. Secured by Design
24. Dwelling mix and floor areas
25. Drainage
26. Sound insulation
27. Carbon emissions
28. Energy certificates
29. Green Procurement and Construction Plan
30. Surface water culvert distance
31. Flood Management Report
32. SuDS Strategy
33. SuDS verification report
34. Finished floor levels in plans
35. Lifts

36. Air Quality Positive Statement
37. Whole Life-Cycle Carbon Assessment
38. Whole Life-Cycle Carbon Assessment post-construction assessment
39. Connectivity infrastructure
40. Circular Economy Statement and Operational Waste Management Strategy
41. Circular Economy Statement Post Completion Report
42. Details of zero / low carbon technologies
43. Accessible housing
44. Baseline biodiversity levels
45. Revised energy report
46. Confirmation of Biodiversity Net Gain (new)
47. Tenure blind affordable units (new)
48. Confirmation of Urban Greening Factor (new)
49. Compliance with Fire Strategy (new)

3. Executive Summary

- 3.1. This application is for an amendment to planning application 20/01526/FUL to vary condition 02 for approved plans and documents.
- 3.2. Planning Committee voted to approve application 20/01526/FUL on 15 December 2020. The decision notice was issued on 28 March 2022.
- 3.3. The proposal remains unchanged but for the amendments set out in paragraphs 3.5 and Section 5 (in greater detail) of this report.
- 3.4. Planning application 20/01526/FUL was for redevelopment of the site involving demolition of the existing buildings and erection of a mixed-use development ranging from 2 to 16 storeys comprising 148 residential units in three blocks, together with commercial floorspace (A1, A2, A3, B1, B2, B8, D1 and D2) at part ground / first floor levels together with substation, car parking, cycle parking, amenity areas, landscaping and associated works.
- 3.5. In amending the extant approval, the applicant seeks to make the following changes to the permitted scheme:
 - Second stairs are introduced in Blocks B and C to allow a second means of fire escape in line with new fire safety requirements introduced by the Mayor of London in February 2023.
 - Resulting from the addition of second stair cores:
 - The unit mix is altered to provide 63 x 1 bed homes (54 approved), 72 x 2 bed homes (71 approved) and 13 x 3 bed homes (23 approved).
 - The total number of units of 148 homes remains unchanged.
 - The number of car parking spaces is reduced from 46 to 43 spaces, resulting in a parking ratio change from 0.31 spaces to 0.29 spaces
 - The number of cycle parking space is increased from 286 to 290.
 - Housing tenures are amended from approved split of 35% London Affordable Rent, 15% Intermediate Market Rent and 50% market sale to 100% Build-to-Rent.
 - The affordable housing component is amended from 50% of habitable rooms/49% of units to 23% of habitable rooms/25% of units. Of the affordable housing provision, affordable tenures are changed as follows:

- From approved 49% of total units: comprising 70% London Affordable Rent and 30% Intermediate Market Rent
 - To proposed 25% of total units: comprising 100% Discounted Market Rent. The rent levels would be set at 30% below full market local rents for the ward.
- 3.6. The introduction of second stairs in Blocks B and C of the consented project brings incalculable benefit to the safety of the buildings and its occupants. This is an essential amendment, although it has consequential impacts. The stair cores have cut into floor plates, resulting in a reduction and reconfiguration of floorspace with an amended unit mix. The applicant has sought to make the changes within the approved massing so as not to affect the exterior design of the buildings. The application also seeks to modify the housing product and affordable housing component to bring it in line with a viability-tested level.
- 3.7. The reduction in affordable housing provision from 50% of habitable rooms (49% of units) as approved to 23% of habitable rooms (25% of units) is notable. The application demonstrates, through a viability assessment, that the present permission is not practicable and the amendments to housing type and affordable component will enable the project to move forward. The revised affordable housing provision is the maximum affordable housing that can viably be delivered on the site. Having failed the statutory Housing Delivery Test, Enfield is in a position of "presumption in favour of sustainable development category", which means granting permission unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits. Under the present application, the provision of Build to Rent housing brings planning benefit as a beneficial housing type, which is an improvement from unregulated rental housing. The proposed breadth (25% of units) and depth (30% below local market rents) of affordable housing provides an intermediate-level affordable housing in a size mix that meets Enfield's evidenced needs.
- 3.8. The residential provision remains of a high quality, there are no changes to the number of residential units to be provided and the contributions secured through the original permission remain.
- 3.9. The primary public benefits of the proposed amendments to the approved scheme can be summarised as follows:
- Second stairs are incorporated in the 12- and 16-storey building segments to ensure the highest standards of fire safety are met
 - All homes are Build to Rent, which secures transparent tenancy terms, longer tenancy periods and well-managed housing which is of a higher quality than conventional private rented housing
 - 25% of homes will be affordable as Discounted Market Rent Build to Rent units
 - Affordable housing has been viability tested to maximise the development's potential to provide affordable housing and to improve its deliverability, which are both key to meeting Enfield's acute housing need
 - Car parking is slightly decreased and provision of cycle parking slightly increased, which supports more sustainable transportation choices

4. Site and surroundings

- 4.1 The subject site is located within the Brimsdown Ward located approximately 2 miles east of Enfield Town Centre. It is an irregularly shaped site that measures approximately 4600 square metres, located on the eastern side of the junction of Green Street and Enstone Road, just south of Brimsdown Railway Station. Brimsdown Station offers access to rail services on the West Anglia main line.
- 4.2 The site is bounded to the east by railway tracks, beyond which lies a large swathe of land designated as Strategic Industrial Land, containing the second largest industrial estate in London.
- 4.3 To the north east the site is bound by a 3 storey residential block (that also backs onto the railway) and to the immediate north a 2 storey block that fronts Green Street, comprising of commercial uses at ground floor with a mixture of other uses above.
- 4.4 To the immediate west of the site lies the Green Street bus stand which is the terminus for buses serving the 191 and 307 bus routes. Beyond Green Street bus stand, and across Green Street to the north west, lies a traditional pattern of 1930's, 2 storey predominately semi detached houses set behind reasonably generous front gardens.
- 4.5 To the south and south west of the site lies a series of homogenous 3 and 4 storey flatted blocks of late 20th Century construction with off street parking set to the sides and/or rear. These blocks are characterised by their generous setbacks from the back edge of pavement in a manner commensurate with the front garden depths of the 1930's houses nearby.
- 4.6 The railway acts as an significant dividing line between the residential developments on its western side and the industrial land to the east. Indeed the application site is the last site in the near vicinity on the western side of the railway in large scale employment use.
- 4.7 The southern part of the site is located in Flood Zone 1 (land assessed as having the least annual probability of flooding) whilst the northern part of the site is located within Flood Zone 2. Aside from this the site has no other specific designation within the Enfield Development Management Document 2014.
- 4.8 There are no statutorily or non-statutorily listed buildings on or near the site and the site does not lie within or in close proximity to a conservation area.
- 4.9 The site is accessed via metal gates onto Green Street and Enstone Road and presently contains two large warehouse-type buildings with 3,318 square metres of floor space with associated surface car parking. The site is vacant and is in a condition that makes it unsuitable for occupation or use. Building works have not commenced on site.

5. Proposal

- 5.1 The present application is for an amendment to application 20/01526/FUL. Application 20/01526/FUL was granted subject to conditions for demolition of all buildings on the site to provide a mixed-use scheme with 148 flats, divided

into three blocks comprising principally commercial floorspace at ground and first floor levels (Blocks A, B and C), together with ground and first floor level car parking and publicly and privately accessible landscaped areas.

- 5.2 This report considers only the proposal brought by the present application for minor material amendments. This report does not re-consider the proposal for which permission was granted under application 20/01526/FUL.
- 5.3 The present application seeks to make the following changes to the permitted scheme:
- Second stairs are introduced in Blocks B and C to allow a second means of egress in line with new fire safety requirements introduced by the Mayor of London in February 2023 for buildings in excess of 30 metres in height.
 - Resulting from the addition of second stair cores:
 - unit mix is altered to provide 63 x 1 bed homes (54 approved), 72 x 2 bed homes (71 approved) and 13 x 3 bed homes (23 approved). The total number of units of 148 homes remains unchanged
 - the number of car parking spaces is reduced from 46 to 43 spaces, resulting in a parking ratio change from 0.31 spaces to 0.29 spaces
 - the number of cycle parking space is increased from 286 to 290
 - Housing is proposed to be delivered entirely as Build-to-Rent.
 - The affordable housing component is amended to 25% of units (23% of habitable rooms), all comprising Discounted Market Rent at 30% below market local rents for the ward and restricted to households on incomes of £60,000
 - There are no changes to the layout, massing, height or overall exterior appearance of the approved development. Changes to the buildings are internal.
- 5.4 Three buildings are proposed to be arranged around a courtyard to the centre of the site, with both soft and hard landscaping elements incorporating extensive planting and permeable paving.
- 5.5 Block A is proposed to be located on the site frontage to Green Street forming a continuation of the commercial façade to the immediate north, at the western edge of the site. This would take the form of a part 4- part 5-storey building incorporating commercial floorspace at ground floor levels and containing 19 flats.
- 5.6 Block B is proposed to be located at the north east corner of the site backing onto Brimsdown Station, and would be a part 8, part 16 storey building. Block B would contain 73 flats.
- 5.7 Block C is proposed to back onto the railway and would rise to a part 10, and part 12 storeys. There would be a two storey projection to the front of Block C, fronting Enstone Road that would incorporate commercial floorspace. Blocks B and C would also be connected to each other by a 2 storey podium that would principally contain car parking at ground and first floor levels accessed by a road along the southern boundary of the site. Block C would contain 56

flats.

6. Relevant Planning Decisions

Application Description	Reference	Status
Redevelopment of the site involving demolition of the existing buildings and erection of a mixed-use development ranging from 2 to 16 storeys comprising 148 residential units in three blocks, together with commercial floorspace (A1, A2, A3, B1, B2, B8, D1 and D2) at part ground / first floor levels together with substation, car parking, cycle parking, amenity areas, landscaping and associated works.	20/01526/FUL	28/03/2022 Granted with conditions and s106 agreement
Redevelopment of site involving demolition of existing buildings and erection of 175 self-contained units (comprising 53 x 1 bed, 104 x 2 bed and 18 x 3 bed) with flexible mixed use on the ground floor (A 1, A2, A3, B1 D1) within 2 blocks comprising (Block A, B and D up to 10 storey's and Block C up to 7 storey's) together with undercroft parking and associated landscaping and parking.	18/04935/FUL	12/09/2019 Application withdrawn
CAR PARK	TP/78/1435	26/01/1979 Granted With Conditions
LIFT HOUSING	TP/78/1280	26/10/1978 Granted With Conditions
USE AS WAREHOUSE	TP/71/1247	03/12/1971 Granted With Conditions
ENFIELD_II/718 FACTORY		14/11/1966 Approved
ENFIELD_II/662 SINGLE STOREY FACTORY		13/01/1964 Granted With Conditions

7. Consultations

Statutory and Non-Statutory Consultees

7.1 GLA

The GLA issued a Stage 1 report supporting the principle of redevelopment of the application site for residential use, however, advised non-compliance with the London Plan on the basis that the applicant had not demonstrated that the proposed 13% affordable housing by habitable room represented the maximum viable amount of affordable housing.

Officer response: The applicant undertook further viability work during the course of the present application. Following review by an independent viability expert on behalf of Enfield Council, the proposal for 25% affordable housing was deemed

to be reasonable in viability terms. The affordable housing offer has been reviewed in accordance with policy.

7.2 Health and Safety Executive

No objection. HSE issued a letter stating satisfaction with the fire safety design of the proposal.

7.3 NHS London Healthy Urban Development Unit

No objection. NHS HUDU updated the health provision contribution in line with the amendments.

7.4 Traffic and Transportation

No objection. The change to number of parking spaces is acceptable. The reduction in number of parking spaces is minimal and corresponds to the increase in number of one-bed and reduction in number of two- and three-bed units.

7.5 Housing

Housing officers acknowledge that the viability submission demonstrates that the site cannot deliver the consented 50% affordable housing or social rent as part of the amended proposal. On this basis, housing officers accept the proposal on the stipulation that there is provision for low incomes and the Council is able to secure nominations. Housing officers would like to see the 30% Discounted Market Rent maintained in line with local rents for the ward and restricted to households on incomes of £60,000. The annual housing costs of rent and service charges should be no greater than 40% of net income (assumed to be 70% of gross income) and capped at local housing allowance rents. The Council requires a Nominations Agreement secured in the Variation to the S106 Agreement to ensure the Council is able to let via the affordable provision.

7.6 LBE Building Control

No objection. Building Control officers agree with the HSE that the fire safety design is satisfactory, to the extent that it affects land use planning.

Public Consultation

7.7 Public consultation as a result of this planning application involved notification letters being sent to 622 neighbouring properties 3 October 2022, a press advert in the Enfield Independent was published 28 September 2022 and 2 site notices were erected 4 October 2022.

7.8 As a result of public consultation, 12 representations were received. All representations were letters of objection. The reasons for comment are summarised as follows:

- Affect local ecology
- Close to adjoining properties
- Community Infrastructure Levy funding
- Conflict with local plan

- Development too high
- General dislike of proposal
- Inadequate access
- Inadequate parking provision
- Inadequate public transport provisions
- Includes carbon reduction measures
- Increase danger of flooding
- Increase of pollution
- Loss of light
- Loss of parking
- Loss of privacy
- Noise nuisance
- Not enough info given on application
- More open space needed on development
- Other - give details
- Out of keeping with character of area
- Over development
- Strain on existing community facilities

7.9 The comments in the letters of objection relate to the proposal for the entire development, which was the subject of application 20/01526/FUL. The present application is an amendment of application 20/01526/FUL, limited to changes to the housing tenures, the proportion of affordable housing, the unit size mix, quantity of commercial space, numbers of parking spaces and numbers of bicycle spaces, and the addition of second stair cores in Blocks B and C. The proposed amendments are unrelated to the impacts cited in the public representations.

8. Relevant Policy

National Planning Policy Framework 2021

- 8.1 The National Planning Policy Framework (NPPF) introduces a presumption in favour of sustainable development. In this respect, sustainable development is identified as having three dimensions - an economic role, a social role and an environmental role, as per paragraph 8 of the NPPF:
- a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
 - b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and
 - c) an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including

moving to a low carbon economy.

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

previous 3 years.”

- 8.7 The Council's recent housing delivery has been below Enfield's increasing housing targets. This has translated into the Council being placed in the “presumption in favour of sustainable development category” by the Government through its Housing Delivery Test.
- 8.8 The Housing Delivery Test (HDT) is an annual measurement of housing delivery introduced by the government through the NPPF. It measures the performance of local authorities by comparing the completion of net additional homes in the previous three years to the housing targets adopted by local authorities for that period.
- 8.9 Local authorities that fail to meet 95% of their housing targets need to prepare a Housing Action Plan to assess the causes of under delivery and identify actions to increase delivery in future years. Local authorities failing to meet 85% of their housing targets are required to add 20% to their five-year supply of deliverable housing sites targets by moving forward that 20% from later stages of the Local Plan period. Local authorities failing to meet 75% of their housing targets in the preceding 3 years are placed in a category of “presumption in favour of sustainable development.
- 8.10 In 2019, Enfield met 77% of the 2,394 homes target for the preceding three-year period (2016/17, 2017/18, 2018/19), delivering 1,839 homes. In 2020 Enfield delivered 56% of the 2,328 homes target. In 2021, Enfield delivered 1777 of the 2650 homes required, a rate of 67%. The consequence of this is that Enfield is within the “presumption in favour of sustainable development” category.
- 8.11 This is referred to as the “tilted balance” and the NPPF states that for decision- taking this means granting permission unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole – which also includes the Development Plan. Under the NPPF paragraph 11(d) the most important development plan policies for the application are deemed to be 'out of date'. However, the fact that a policy is considered out of date does not mean it can be disregarded, but it means that less weight can be applied to it, and applications for new homes should be considered with more weight (tilted) by planning committee. The level of weight given is a matter of planning judgement and the statutory test continues to apply, that the decision should be, as section 38(6) of the Planning and Compulsory Purchase Act 2004 requires, in accordance with the development plan unless material considerations indicate otherwise.

8.12 The London Plan 2021

The London Plan is the overall strategic plan for London setting out an integrated economic, environmental, transport and social framework for the development of London for the next 20-25 years. The following policies of the London Plan are considered particularly relevant

GG1	Building Strong and Inclusive Communities
GG2	Making the Best Use of Land
GG3	Creating a Healthy City
GG4	Delivering the Homes Londoners Need

GG6	Increasing efficiency and resilience
D1	London's form, character and capacity for growth
D2	Infrastructure Requirements for Sustainable Densities
D3	Optimising Site Capacity through the Design-Led Approach
D4	Delivering Good Design
D5	Inclusive Design
D6	Housing Quality and Standards
D7	Accessible Housing
D8	Public Realm
D9	Tall Buildings
D11	Safety, Security and Resilience to Emergency
D12	Fire Safety
D14	Noise
E11	Skills and Opportunities for All
H1	Increasing Housing Supply
H4	Delivering Affordable Housing
H5	Threshold Approach to Applications
H6	Affordable Housing Tenure
H10	Housing Size Mix
S1	Developing London's social infrastructure
S3	Education and childcare facilities
S4	Play and Informal Recreation
HC1	Heritage Conservation and Growth
G1	Green Infrastructure
G4	Open Space
G5	Urban Greening
G6	Biodiversity and Access to Nature
G7	Trees and Woodland
SI1	Improving Air Quality
SI2	Minimising Greenhouse Gas Emissions
SI3	Energy Infrastructure
SI4	Managing Heat Risk
SI5	Water Infrastructure
SI7	Reducing Waste and Supporting the Circular Economy
SI8	Waste capacity and net waste self-sufficiency
SI12	Flood Risk Management
SI13	Sustainable Drainage
T1	Strategic Approach to Transport
T2	Healthy Streets
T3	Transport Capacity, Connectivity and Safeguarding
T4	Assessing and Mitigating Transport Impacts
T5	Cycling
T6	Car Parking
T6.1	Residential Parking
T7	Deliveries, Servicing and Construction
T9	Funding Transport Infrastructure through Planning
DF1	Delivery of the Plan and Planning Obligations

8.13 Mayoral Supplementary Guidance

Play and Informal Recreation (September 2012)

Provides guidance to Local Authorities and development to estimate the potential child yield from a development, and the resulting requirements for play space provision.

Sustainable Design and Construction (April 2014)

The Sustainable Design and Construction (SPG) seeks to design and construct new development in ways that contribute to sustainable development.

The Control of Dust and Emissions during Construction and Demolition (July 2014) The aim of this supplementary planning guidance (SPG) is to reduce emissions of dust, PM10 and PM2.5 from construction and demolition activities in London.

Accessible London: Achieving an Inclusive Environment (October 2014)
The strategy sets out to provide detailed advice and guidance on the policies in the London Plan in relation to achieving an inclusive environment.

Housing (March 2016)
The housing SPG provides revised guidance on how to implement the housing policies in the London Plan.

Affordable Housing and Viability (August 2017)
Sets out the Mayor's policies for assessing and delivering affordable housing and estate renewal.

Better Homes for Local People, The Mayor's Good Practice Guide to Estate Regeneration
Sets out the Mayor's policies for Estate Regeneration.

8.14 Local Plan – Core Strategy

Core Policy 3	Affordable Housing
Core Policy 4	Housing quality
Core Policy 5	Housing types
Core Policy 9	Supporting Community Cohesion
Core Policy 16	Taking part in economic success and improving skills
Core Policy 20	Sustainable Energy use and energy infrastructure
Core Policy 21	Delivering sustainable water supply, drainage and sewerage infrastructure
Core Policy 22	Delivering sustainable waste management
Core Policy 24	The road network
Core Policy 25	Pedestrians and cyclists
Core Policy 26	Public Transport
Core Policy 28	Managing flood risk through development
Core Policy 29	Flood Management Infrastructure
Core Policy 30	Maintaining and improving the quality of the built and open environment
Core Policy 31	Built and landscape heritage
Core Policy 32	Pollution
Core Policy 34	Parks, Playing Fields and Other Open Spaces
Core Policy 36	Biodiversity

8.15 Local Plan – Development Management Document

DMD1: Affordable Housing on Sites Capable of Housing 10 Units or More
DMD3: Providing a Mix of Different Sized Homes
DMD6: Residential Character
DMD8: General Standards for New Residential Development

DMD9: Amenity Space
DMD10: Distancing
DMD37: Achieving High Quality and Design-Led Development
DMD38: Design Process
DMD43: Tall Buildings
DMD44: Conserving and Enhancing Heritage Assets
DMD45: Parking Standards and Layout
DMD47: New Road, Access and Servicing
DMD48: Transport Assessments
DMD49: Sustainable Design and Construction Statements
DMD50: Environmental Assessments Method
DMD51: Energy Efficiency Standards
DMD52: Decentralized energy networks
DMD53: Low and Zero Carbon Technology
DMD55: Use of Roofspace/ Vertical Surfaces
DMD56: Heating and Cooling
DMD57: Responsible Sourcing of Materials, Waste Minimisation and Green Procurement
DMD58: Water Efficiency
DMD59: Avoiding and Reducing Flood Risk
DND60: Assessing Flood Risk
DMD61: Managing surface water
DMD62: Flood Control and Mitigation Measures
DMD64: Pollution Control and Assessment
DMD65: Air Quality
DMD68: Noise
DMD69: Light Pollution
DMD70: Water Quality
DMD71: Protection and Enhancement of Open Space
DMD72: Open Space Provision
DMD73: Child Play Space
DMD78: Nature conservation
DMD79: Ecological Enhancements
DMD80: Trees on development sites
DMD81: Landscaping

8.16 North East Enfield Area Action Plan (2016)

Policy 5.1: Affordable Housing
Policy 5.2: Mix of housing types
Policy 5.3: Improving the public realm
Policy 6.1: Improving existing industrial areas
Policy 7.1: Providing community facilities
Policy 9.1: Sustainable Energy
Policy 19.1: Brimsdown Station Area - short term
Policy 19.2: Brimsdown Station Area - Long term

8.17 Other Material Considerations

Enfield Climate Action Plan (2020)
Enfield Housing and Growth Strategy (2020)
Enfield Intermediate Housing Policy (2020)
Enfield Biodiversity Action Plan
Enfield Characterisation Study (2011)
Enfield Local Heritage List (May 2018)
Enfield S106 SPD (2016)

Enfield Decentralised Energy Network Technical Specification SPD (2015)
 Making Enfield: Enfield Heritage Strategy 2019-2024 SPD (2019)
 The Setting of Heritage Assets – Historic Environment Good Practice Advice in
 Planning: 3, Historic England (2017)
 London Councils: Air Quality and Planning Guidance (2007)
 TfL London Cycle Design Standards (2014)
 GLA: Shaping Neighbourhoods: Play and Informal Recreation SPG (2012)
 GLA: Shaping Neighbourhoods: Character and Context SPG (2014)
 GLA: The Control of Dust and Emissions during Construction and
 Demolition SPG (2014)
 GLA: London Sustainable Design and Construction SPG (2014)
 GLA: Accessible London: Achieving an Inclusive Environment SPG (2014)
 GLA: Social Infrastructure SPG (2015)
 GLA: Housing SPG (2016)
 GLA: Homes for Londoners: Affordable Housing and Viability SPG (2017)
 Mayor's Transport Strategy (2018)
 GLA Threshold Approach to Affordable Housing on Public Land (2018)
 Healthy Streets for London (2017)
 Manual for Streets 1 & 2, Inclusive Mobility (2005)
 National Planning Practice Guidance
 National Design Guide (2019)

8.18 Enfield Draft New Local Plan and Draft Proposals Map

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

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

8.21 Key local emerging policies from the plan are listed below:

Policy DM SE2 – Sustainable design and construction
 Policy DM SE4 – Reducing energy demand
 Policy DM SE5 – Greenhouse gas emissions and low carbon energy supply
 Policy DM SE7 – Climate change adaptation and managing heat risk
 Policy DM SE8 – Managing flood risk
 Policy DM SE10 – Sustainable drainage systems
 Strategic Policy SPBG3 – Biodiversity net gain, rewilding and offsetting
 Policy DM BG8 – Urban greening and biophilic principles
 Policy DM DE1 – Delivering a well-designed, high-quality and resilient environment
 Policy DM DE2 – Design process and design review panel

Policy DM DE6 – Tall buildings
Policy DM DE7 – Creating liveable, inclusive and quality public realm
Policy DM DE10 Conserving and enhancing heritage assets
Policy DM DE11 – Landscape design
Policy DM DE13 – Housing standards and design
Policy DM H2 – Affordable housing
Policy DM H3 – Housing mix and type
Policy DM T2 – Making active travel the natural choice
Strategic Policy SP D1 – Securing contributions to mitigate the impact of development

Analysis

9. Main Planning Issues

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

- Housing Need, Delivery and Quality
- Non-residential Land Use
- Fire Safety
- Biodiversity and Ecology
- Transport and Parking
- Energy
- Community Infrastructure Levy and S106

10. Housing Need, Delivery and Quality

Principle of Residential Use

- 10.1 The principle of bringing 241 Green Street forward as a residential development has been established in the approved planning application reference 20/01526/FUL. The present application maintains the proposal for 148 homes, as approved.
- 10.2 The use of the site for residential is reinforced by its inclusion as the Council's Draft Enfield Local Plan (Regulation 18) (2021) as Site Allocation SA34 for new homes and replacement employment floorspace. The Site Allocation estimates site capacity at 92 homes, plus employment re-provision. As a draft document, the emerging Local Plan carries lesser weight than adopted policy, however, it is recognised that the principle of residential use has been accepted and that the site is included in the borough's 5-Year Housing Land Supply.
- 10.3 The use of the site for the delivery of homes is not proposed to be changed and continues to be supported.

Affordable Housing

- 10.4 The NPPF (Paragraph 125) is clear that where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities and ensure that developments make optimal use of the potential of each site. In these circumstances: c) local planning authorities should refuse applications which they consider fail to make efficient use of land, taking into account the policies in the NPPF. The London Plan 2021 identifies a need for a minimum of 1,246 dwellings per year to be delivered over the next 10 years in the Borough, an increase over the previous target of 798.
- 10.5 Enfield's Housing and Growth Strategy 2020-2030 sets a priority to maximise housing delivery. The key aims of the Strategy seek to address the housing crisis within the Borough. During consideration of the Cabinet report, Members discussed the current housing situation and highlighted the rise in private sector rents in proportion to the average salary and the significant rise in homelessness. Enfield has one of the highest numbers of homeless households in the country. Insecurity and unaffordability of private sector housing has

evidence-based links with homelessness. One of the most common reason for homelessness in London is currently due to the ending of an assured tenancy (often by buy to let landlords). Ministry of Housing, Communities & Local Government (now called Department for Levelling Up, Housing and Communities) (2018) data shows a significant increase in the number of households in Enfield using temporary accommodation – with a significant 67% increase between 2012 and 2018.

- 10.6 Enfield's Authority Monitoring Report 2020/2021 shows that during the preceding 10 years, the Borough had delivered a total of 5,616 homes which equates to approximately 562 homes per annum. Enfield's 2020 Housing Delivery Action Plan recognises that the construction of more affordable high-quality homes is a clear priority, with only 60% of approvals being implemented. A Local Housing Need Assessment (LHNA) was undertaken in 2020 and identifies an annual housing need of 1,744 homes across the Borough.
- 10.7 London Plan Policies H4 and H5 outlines a strategic target for 50% of all new homes delivered across London to be affordable and industrial land appropriate for residential use delivering at least 50% affordable housing where there is a net loss in industrial land (Policy H4 (A)(5)). The extant permission confirmed the Application Site qualifies for the requirement to deliver 50% affordable housing by habitable rooms.
- 10.8 Core Policy 3 of the Core Strategy sets a borough-wide affordable housing target of 40% in new developments, applicable on sites capable of accommodating ten or more dwellings. Affordable housing should be delivered on-site unless in exceptional circumstances. The Application Site falls within the Brimsdown Station Area of the North East Enfield Area Action Plan (2016). Policy 5.1 states that new development should follow the affordable housing requirement of the Core Strategy, and further, given viability issues in the Plan area, "will take a flexible approach to the split of social rented, affordable rent and intermediate housing in order to support the delivery of new affordable homes." In reflection of London Plan targets and the evidence demonstrating the crucial need for affordable housing, emerging Local Plan Policy H2 aims to secure 50% of all new homes in Enfield as affordable.
- 10.9 It should be restated that Enfield is in a category of "presumption in favour of sustainable development" having failed to meet at minimum 75% of its housing targets in the preceding three years – meaning homes that have received permission to be built are not being constructed and completed at a rate that delivers needed housing. In practical terms this is referred to as the "tilted balance" and the NPPF states that for decision-making this means granting permission unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits. This also means that Development Plan policies carry lesser weight and applications for new homes are given greater or "tilted" weight. The level of weight given is a matter of planning judgement and the statutory test continues to apply, that the decision should be, as section 38(6) of the Planning and Compulsory Purchase Act 2004 requires, in accordance with the development plan unless material considerations indicate otherwise.
- 10.10 The present application seeks to amend the approved quantity of affordable housing from 50% of habitable rooms and 49% of units to 23% of habitable rooms (93 of 400 habitable rooms) and 25% of units (37 of 148 units).
- 10.11 London Plan Policy H5 sets out a threshold approach to planning applications which trigger an affordable housing requirement. As already noted, Policy H4

requires 50% of habitable rooms as affordable on industrial sites that are suitable for housing, which applies to the Application Site. In the case of the application that is being amended, reference 20/01526/FUL, the application was made via the Fast Track Route of the threshold approach and was not required to provide a viability assessment at application stage. The original application proposed 50% of habitable rooms as affordable housing and this quantum was secured through the S106 agreement.

- 10.12 As the applicant now proposes to amend the quantity of affordable housing to an amount that no longer meets the threshold requirement in London Plan Policy H5, the need is triggered to follow the Viability Tested Route.
- 10.13 The applicant undertook a viability appraisal, which has been reviewed by an independent viability specialist on behalf of Enfield Council in accordance with relevant policy and guidance, including the Mayor's Affordable Housing and Viability SPG and draft Affordable Housing and Development Viability London Plan guidance. The latter document states under paragraph 2.3.3 that "Where it is accepted that the viability of a site should be considered as part of an application, the decision-maker should determine the weight to be given to a viability assessment having regard to whether the local Development Plan and the viability evidence underpinning it are up to date, and considering the transparency of the evidence supporting the viability assessment."
- 10.14 The Council's independent viability consultant found the offer to be reasonable in viability terms. It should be recognized that, following further viability work, the affordable housing component increased from 13% initially to 25% as presently proposed and set out in this report. The consultant recommended that a pre-implementation and late stage review be secured in a S106 agreement.
- 10.15 Being in the category of "presumption in favour of sustainable development", Enfield's Development Plan is deemed to be out of date. Further, Enfield's Core Strategy (2010) and Development Management Document (2014) both exceed the five-year time limit established by NPPF paragraph 33 to review and update plans as necessary. This also means that the evidence supporting these plans is out-of-date. Under these circumstances, it is reasonable to allocate significant weight to the viability of the site in consideration of the present application.
- 10.16 In light of the "tilted" balance that applies, as well as all material considerations, including the site's viability, the challenges to housing delivery in Enfield and evidenced need for affordable housing, officers accept the proposal for 25% affordable housing.

Build-to-Rent

- 10.17 The extant permission is for development of 148 units comprising a combination of London Affordable Rent, Intermediate Market Rent and market rent or sale units. The applicant proposes to amend the housing product to 100% Build-to-Rent units (which will include a proportion of Discount Market Rate, discussed under the affordable housing consideration.)
- 10.18 Build to Rent is a form of rental housing that is controlled by requirements set out in London Plan Policy H11. This form of housing is an alternative to unregulated private rent units, or private market sale units. Build to Rent offers higher-quality, managed and regulated rental housing that may be more readily available to residents than for-sale homes.

- 10.19 In order to qualify as Build to Rent housing, London Plan Policy H11 stipulates that the housing must meet a set of criteria:
- i. the development, or block or phase within the development, has at least 50 units
 - *This criterion is met as the proposal is for 148 units*
 - ii. the homes are held as Build to Rent under a covenant for at least 15 years
 - iii. a clawback mechanism is in place that ensures there is no financial incentive to break the covenant
 - iv. all the units are self-contained and let separately
 - *Units have been designed to be self-contained, as included in plans for approval*
 - v. there is unified ownership and unified management of the private and Discount Market Rent elements of the scheme
 - vi. longer tenancies (three years or more) are available to all tenants. These should have break clauses for renters, which allow the tenant to end the tenancy with a month's notice any time after the first six months
 - vii. the scheme offers rent and service charge certainty for the period of the tenancy, the basis of which should be made clear to the tenant before a tenancy agreement is signed, including any annual increases which should always be formula-linked
 - viii. there is on-site management. This does not necessarily mean full-time dedicated on-site staff, but that all schemes need to have systems for prompt resolution of issues and some daily on-site presence
 - ix. providers have a complaints procedure in place and are a member of a recognised ombudsman scheme
 - x. providers do not charge up-front fees of any kind to tenants or prospective tenants, other than deposits and rent-in-advance.

Criteria ii. through to x. will be secured in the Variation to the S106 Agreement to ensure the development meets policy requirements for Build to Rent.

- 10.20 London Plan paragraph 4.11.1 advises that “boroughs should take a positive approach to the Build to Rent sector to enable it to better contribute to the delivery of new homes.”
- 10.21 Build to Rent development offers a level of security to builders as the model does not rely on the sale of market homes, where developers need to invest up-front capital and realise an immediate return, which brings risk in variable market conditions. Instead, the model attracts institutional investors for whom longer term returns (via rent) are preferable. For the Council, this provider security supports housing delivery – particularly where Enfield has failed its statutory Housing Delivery Test, placing it in the Government’s “presumption in favour of sustainable development category”.
- 10.22 For residents, Build to Rent homes provide valuable security by providing longer-term tenancies, better management standards, and rent and service charge certainty for the period of the tenancy. This is a considerable improvement over the conventional private rent stock, where there is no regulation of landlords or housing quality.
- 10.23 The emerging Enfield Local Plan Policy H7, although having limited weight as it is a draft plan, supports Build to Rent where schemes:

- i. provide high quality housing and a mix of dwelling sizes that meet identified local and strategic housing needs;
- ii. offer tenancies over at least a three-year period;
- iii. provide on-site affordable housing in perpetuity in the form of Discounted Market
- iv. Rent at genuinely affordable rent level;
- v. provide homes held over at least 15 years under covenant to be secured through a section 106 legal agreement. A claw-back mechanism will apply in accordance with London Plan policy;
- vi. provide a review mechanism in the event that policy compliant levels of affordable housing cannot viably be provided; and
- vii. provide a management plan, committing to high standards of ongoing management of the premises.

10.24 These stipulations are consistent with adopted policy in the London Plan. The draft Local Plan recognizes Build to Rent provides a valuable addition by widening the type of homes available in Enfield, assisting in producing additional homes to meet overall targets and likely driving up standards for tenants in market rented homes.

10.25 Enfield's Housing and Growth Strategy 2020-2030 sets five ambitions, the first of which is "More affordable homes for local people" and the third of which is "Quality and variety in private sector housing". The Strategy states "We will also prioritise the development of homes through Build to Rent schemes meeting the emerging demand for this tenure." And with respect to why Build to Rent will be supported by the Council, "Developments are built especially with the needs of renters in mind – quality design, decent management and tenure security. This will be a feature in our regeneration schemes going forward."

10.26 As an amendment in housing product from the 2020 permission, which delivers a combination of London Affordable Rent, Intermediate Market Rent and market rent or sale units (the permission does not stipulate whether the market units are rental or sale units), to Build to Rent is an improvement in the type of housing, particularly among market-rate units. Build to Rent ensures a higher quality of building management, accountability by the operator and greater security for tenants to take up longer tenancies and understand rents and fees through transparent standards.

10.27 Officers support the provision of Build to Rent homes with the development of 241 Green Street, and see this housing type as a planning benefit, especially among market-rate units as the rents to be secured would be set 30% below market rates of the ward.

Housing Tenures

10.28 London Plan Policy H6 sets out the split of affordable tenures that should be applied in residential development:

- a minimum of 30 per cent low-cost rented homes, as either London Affordable Rent or Social Rent, allocated according to need and for Londoners on low incomes
- a minimum of 30 per cent intermediate products which meet the definition of genuinely affordable housing, including London Living Rent and London Shared ownership
- the remaining 40 per cent to be determined by the borough as

low-cost rented homes or intermediate products (defined in Part A1 and Part A2) based on identified need.

- 10.29 Enfield Core Policy 3 and DMD Policy 1 stipulate a borough-wide affordable housing ratio of 70% social rented and 30% intermediate provision.
- 10.30 Although of lesser policy weight, the emerging Local Plan Draft Strategic Policy SP H2 stipulates that affordable housing should be provided with a tenure mix of 50% social rented housing and 50% intermediate housing.
- 10.31 The development proposes all of the 37 affordable homes to be Discounted Market Rent, discounted at 30% below market rents.

Proposed affordable tenure mix

Low-cost	Intermediate
0 (0%)	37 homes (100%)

- 10.32 This an intermediate form of affordable housing. London Plan Policy H11 governs Build to Rent and states that “Where a development meets the criteria set out in Part B [Build to Rent criteria], the affordable housing offer can be solely Discounted Market Rent at a genuinely affordable rent...”
- 10.33 Policy 4.1 of the London Housing Strategy (2018) sets out what the Mayor accepts as being genuinely affordable homes. Under criterion B, it states:

“The Mayor will support intermediate rented homes for Londoners on middle incomes who do not have enough savings to access mainstream or affordable home ownership. This will include:

 - i. using his funding and planning powers to deliver new London Living Rent homes to help private renters save for a deposit to buy a home; and
 - ii. supporting a range of other types of intermediate rented homes as long as they are genuinely affordable to Londoners, generally meaning that they should be accessible by those whose household incomes fall under £60,000.”
- 10.34 Discounted Market Rent is delivered and managed by the Build to Rent provider and delivered without grant, rather than being operated by a Registered Provider or a council. The DMR units must be fully integrated into the development and be indistinguishable from market units.
- 10.35 The proposal to provide all 37 units of affordable housing as an intermediate tenure does not accord with London Plan policy, which calls for affordable housing tenures to be provided as 30% social rent, 30% intermediate product and 40% in line with evidenced need.
- 10.36 However London Plan Policy H11, which concerns Build to Rent, anticipates that affordable housing will be provided as Discounted Market Rents – which are an intermediate product. The proposed affordable housing offer complies with this policy. This form of affordable housing is fully integrated and does not introduce challenges around separate management, separate entrances and cores, which contribute to a more efficient use of floorspace and save area for housing and affordable housing.
- 10.37 Further, this application has been viability tested to assess the maximum amount of affordable housing the development can deliver. The viability

submission concluded that the development can provide 25% of units and 23% of habitable rooms as Discounted Market Rent homes at a discounted rate of 30% below market rents. This allows for the greatest proportion of units as affordable housing. Clearly, the inclusion of homes at a greater depth of affordability, such as social rent units, would reduce the breadth of affordability to a level below 25%.

- 10.38 The affordable units are located across the development. The entirety of Block A is proposed to be DMR, comprising 19 units. Eight DMR units are located in Block B on floors 2, 3, 6 and 7. Ten DMR units are located in Block C on floors 2 through 6. The units identified as DMR in Blocks B and C are well located, overlooking the roof open space amenity over the commercial unit on Block C and car park connecting Blocks B and C. The units are west- and south-facing and well-integrated into the building floorplans. In order to ensure the DMR units are fitted to an equivalent standard to market units, a condition is recommended that the units are tenure blind.
- 10.39 In review of the affordable housing proposal, housing officers have stipulated that the rent will need to be maintained in line with local rents for the ward and restricted to households on incomes of a maximum of £60,000. The annual housing costs of rent and service charges should be no greater than 40% of net income (assumed to be 70% of gross income) and capped at local housing allowance rents. As DMR is administered by the Build to Rent provider, a Nominations Agreement will have to form part of the S106 to ensure the Council is able to let the affordable provision. These stipulations will be captured in the Variation to the S106 Agreement.
- 10.40 The S106 agreement will also secure an early stage viability review and a late stage viability review. In the event that viability improves, these obligations would enable a greater breadth or depth of affordability.
- 10.41 The proposal for affordable housing has been viability tested and it is found, with confirmation from the Council's independent viability consultant, the affordable housing component is sound in viability terms – meaning the DMR is deliverable and in accordance with adopted planning policy. London Plan Policy H11 supports intermediate tenure DMR housing as the affordable housing product that is delivered with Build to Rent developments. In consideration of these factors, as well as the fact that the intermediate affordable housing complies with the Mayor's definition of genuinely affordable housing and the DMR tenure enables the greatest number (proportion) of homes to be affordable to Enfield's middle income residents, the proposal for DMR units is supported.

Dwelling Mix

- 10.42 London Plan Policy H10 states that schemes should generally consist of a range of unit sizes and that this should have regard to a number of criteria including robust local evidence, the mix of uses in the scheme, the range of tenures in the scheme, the nature and location of the site, amongst other considerations.
- 10.43 Core Policy 5 of the Core Strategy seeks to provide the following borough-wide mix of housing:
- Market housing – 20% 1 and 2 bed flats (1-3 persons), 15% 2 bed houses (4 persons), 45% 3 bed houses, (5-6 persons), 20% 4+ bed houses (6+ persons).
 - Social rented housing - 20% 1 bed and 2 bed units (1-3 persons), 20% 2 bed

units (4 persons) 30% 3 bed units (5-6 persons), 30% 4+ bed units (6+ persons).

- The mix of intermediate housing sizes will be determined on a site by site basis and the appropriate mix must take into account a range of factors, including development viability and the affordability of potential users.

10.44 The evidence base to support the unit mix set out in Core Policy 5 dates from 2008. More recently, the Local Housing Needs Assessment 2020 was prepared to support the emerging Local Plan and is the most up-to-date source of evidence. Reflecting London Plan Policy H10 A1, Draft Local Plan Policy H3 (while it is not adopted policy), outlines priority types for different sized units across different tenures:

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

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

10.46 The approved mix of unit sizes across tenures is as follows:

Housing Mix and Tenure	1Bed/2pers (Hab Rooms)	2Bed/3pers (Hab Rooms)	2Bed/4pers (Hab Rooms)	3Bed/5pers (Hab Rooms)	Total Units (Hab Rooms)	% By Unit (Hab Rooms)
London Aff. Rent	11(22)	1(3)	22(66)	12(60)	46(151)	50%(51%)
Interm. Mkt Rent	15(30)	4(12)	8(24)		27(66)	
Private	28(56)	6(18)	30(90)	11(47)	75(211)	50%(49%)
Total	54(108)	11(33)	60(180)	23(107)	148(428)	100%(100%)

10.47 The applicant proposes the following dwelling mix across the entire housing offer:

Proposed dwelling mix

	1b/2p		2b/3p		2b/4p		3b/4p		3b/5p		TOTAL
DMR	22	59%	5	14%	6	16%	0	0%	4	11%	37
Market	41	37%	19	17%	42	38%	6	5%	3	3%	111
Total	63	43%	24	16%	48	32%	6	5%	7	4%	148

10.48 Since the development was approved under application reference 20/01526/FUL, there have been changes to fire safety requirements announced by the National Fire Chiefs Council, formalised through a consultation by the Government on 23 December 2022 and, in February 2023, through an announcement by the GLA requiring second staircases in

buildings over 30 meters. This new requirement impacted two segments of the proposed development, Blocks B and C. The application for the Section 73 had already been submitted when the changes were introduced, requiring the applicant to revise the application in accordance with the fire safety guidance. The second stairs in the two blocks were incorporated within the approved massing and, as such, no changes to the building's external appearance, massing or height is proposed. However, the addition of the stair cores resulted in the reduction in size of some units:

- Block A remains unamended as there is no introduction of a second stair
- Block B: cycle store is reconfigured and there is a change in unit layouts largely comprising the loss of a bathroom, a modest reduction in unit size, or consolidation of smaller units (one- and two-bedroom) to provide three bedroom units.
- Block C: some car parking is displaced, and there is a change in unit layouts largely comprising the loss of a bathroom and conversion of some three-bedroom units to two-bedrooms

In summary, the changes to unit sizes from the extant permission across all tenures are as follows:

Difference in unit sizes from extant permission

1b/2p	2b/3p	2b/4p	3b/4p	3b/5p
+9	+13	-12	+6	-16

- 10.49 Taken as a whole, the proposed dwelling size mixes deviate from the adopted policy (Core Policy 5) and the borough-wide evidence of need, providing a larger proportion of one-bedroom units and fewer 3- and 4-bedroom than the evidence indicates needs to be provided. While the proposed mix deviates from need, it is largely consistent with the mix in the approved scheme.
- 10.50 Looking at the individual tenures, the market housing disproportionately proposes 1-bed and 2-bed homes, and underprovides family-sized 3- and 4- bedroom, for which there is a greater evidenced need. It is noted that the majority of 2-bedroom units is for four people, or smaller families.
- 10.51 The application concentrates provision of affordable housing in the intermediate tenure, which is accepted by officers, as discussed in the preceding section. The size mix proposed for the DMR units complies with evidenced need, providing over half of intermediate units as 1-bedroom homes and 30% as 2-bedroom homes. This is in line with the highest need. Four (11%) 3-bedroom units are proposed. While 3-bedroom units are in medium need, the provision of family-sized homes is welcomed.
- 10.52 While the market-rate homes deviate from evidenced need, policy accepts that the evidenced proportions cannot be delivered in every development, and the applicant has given particular priority to ensuring the affordable units are sized where there is greatest need. Build to Rent is also a unique product to other private rent and private sale housing products. The Government prescribes a "tilted balance" in favour of housing delivery to the Council's planning decision-making as a result of Enfield's shortfall in meeting housing delivery targets. This means that applications for new homes should be given greater weight, and Councils should grant permission unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits of the housing proposal. In 2021, Enfield delivered 67% of its Housing Delivery Test target for the preceding three-year period. Although not in line with recently demonstrated need, the proposed dwelling mix with a disproportionate provision of one- and two-bedroom

homes in the market-rate tenure means that more homes are provided overall.

- 10.53 In view of the fact that the mix of affordable intermediate homes complies with policy, and there is mix of market rate homes with a large proportion of 2-bed/4-person units and nine 3-bedroom units, officers are broadly supportive of the proposed size mix.

Quality of accommodation

- 10.54 Although the exterior appearance of the development is not proposed to be amended, the addition of stair cores has resulted in changes to residential floor layouts and unit arrangements.
- 10.55 The layout changes were found by officers to be modest and there is no material change to aspects, meeting space standards, outlook or accessibility. The applicant adjusted layouts in response to design officers' comments and the arrangements are now considered to be acceptable. Comments included improvements to cycle store layouts, landscaping and arrangements of living areas and kitchen areas.

11. Non-residential land use

- 11.1 The proposal for flexible commercial units remains unchanged in location, floor space and uses.
- 11.2 There have been changes to The Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020 since the application related to the extant permission reference was submitted. For completeness, the present application will reconcile the changes to use classes in order to ensure that the present permission being sought is up-to-date and accords with current use classes.
- 11.3 The present permission is for flexible commercial uses that include use classes A1; A2; A3; B1; B8; D1 (except for as a place of worship); and D2. The present amendment will adjust these use classes to maintain flexibility. As part of the present application, commercial spaces will be permitted to be occupied by use class E. The update to use classes does not introduce any changes to the proposed commercial or non-residential uses.

12. Fire Safety

- 12.1 London Plan Policy D12 outlines that in the interests of fire safety and to ensure the safety of all building users, all development proposals must achieve the highest standards of fire safety and ensure that they follow a set criterion. Part B of the policy outlines that all major development proposals should be submitted with a Fire Statement which is an independent fire strategy, produced by a third party, suitably qualified assessor.
- 12.2 This application is submitted with a Fire Strategy Statement (9 March 2023).
- 12.3 Since the development was approved under application reference 20/01526/FUL, there have been changes to fire safety requirements announced by the National Fire Chiefs Council, formalised through a consultation by the Government on 23 December 2022 and, in February 2023, through an announcement by the GLA requiring second staircases in buildings over 30 meters. This change required the

addition of second stairs in Blocks B and C.

- 12.4 Additionally, the Health and Safety Executive (HSE) is now the statutory consultee on matters of fire safety for buildings of 18m or 7 storeys in height, whichever is reached first.
- 12.5 HSE issued a letter stating that the authority is satisfied with the fire safety design, to the extent that it affects land use planning.
- 12.6 The submission was additionally reviewed by LBE Building Control who agreed with the HSE.
- 12.7 The addition of second stair cores in Blocks B and C is strongly supported. It is recommended that a planning condition is included requiring compliance with the Fire Strategy to accord with London Plan Policy D12 and DMPO 2015.

13. Biodiversity and Ecology

- 13.1 The NPPF (Paragraph 174) requires planning decisions to protect and enhance sites of biodiversity value, providing net gains for biodiversity and establishing resilient ecological networks. London Plan policy G1 requires developments to provide elements of green infrastructure. Policies G5 and G6 requires developments to incorporate urban greening, manage impacts on biodiversity, secure a net biodiversity gain and provide access to nature. At a local level, policy CP36 of the Core Strategy requires development to protect, enhance, restore or add to existing biodiversity including green spaces and corridors. Development Management Document policy DMD 78 requires major development to maximise opportunities for nature conservation. Draft Local Plan policy G14 refers to the need to promote qualitative enhancement of biodiversity sites and networks and encourage the greening of the Borough. The emerging Local Plan, although of lesser policy weight, includes Policy BG3 which refers to a minimum of 10% net gain.
- 13.2 Condition 44 of the extant permission reference 20/01526/FUL requires the applicant to provide a baseline biodiversity level calculation and a report confirming the percentage increase of biodiversity in line with London Plan Policy G6. It is recommended that a condition is included requiring confirmation that the completed scheme provides the level of biodiversity outlined in the report.
- 13.3 The existing permission reference 20/01526/FUL is also supported by an Urban Greening Factor calculation. It is recommended that a condition is included requiring confirmation that the completed scheme provides the level of urban greening consistent with the calculation.

14. Energy

- 14.1 London Plan Policy SI 2 Minimising greenhouse gas emissions requires monitoring of energy demand and carbon emissions in major developments to ensure that planning commitments are being delivered. At the time the approved application was considered at Planning Committee, the 2021 London Plan had not yet been adopted. To ensure policy compliance and for completeness, the obligation to undertake energy monitoring is now proposed to be captured in the Variation to the S106 Agreement.

15. Transport and Parking

- 15.1 The proposed amendment results in the reduction of three car parking spaces in Block C, which are displaced by a new stair core. This reduces car parking from a total 46 approved to 43 spaces proposed and changes the parking space to residential unit ratio from 0.31 to 0.29. The number of bicycle parking spaces is increased from 286 to 290.
- 15.2 London Plan 2021 Policy T1 and the Mayor's Transport Strategy set out an ambition for 80% of journeys to be made by sustainable transport modes – that is by foot, cycle or public transport – by 2041. The Mayor's 'Healthy Streets' driver looks to reduce car dominance, ownership and use, whilst at the same time increasing walking, cycling and public transport use. Enfield Development Management Document (2014) Policy DMD 45 Parking Standards and Layout states that the Council aims to minimise car parking and to promote sustainable transport options.
- 15.3 Transport officers advise that the changes in loss of parking spaces is minimal and does not introduce any negative impacts. There is no loss of accessible car parking. The addition of three bicycle spaces is positive. These changes comply with policy, which encourages sustainable modes of transport and reduction in car use. Brimsdown Station is 125 metres from the site and the Route 307 bus stop is immediately across the street.
- 15.4 The existing permission includes conditions requiring details of a Car Parking Management Plan, as well as details of the siting and design of secure covered cycle parking facilities. These conditions be carried over to the new permission.

16. S106 Heads of Terms

- 16.1 The extant permission reference 20/01526/FUL is subject to a Section 106 agreement. If approved, the present application for amendments will require a Deed of Variation to the original S106 Agreement to include obligations introduced by the amendments and updates to policy since the original decision was issued. The table below outlines the Heads of Terms of financial and non-financial contributions to be secured within the variation to the S106 Agreement. (The contributions stemming from the present amendments are italicized.)

Heads of Terms	Description
<i>Affordable Housing</i>	<i>Overall quantity, tenure and size mix, early stage and late stage viability.</i>
<i>Build to Rent</i>	<i>Criteria in London Plan Policy H11</i>
Green Street / Enstone Road enhancement / Transport related works	Secure enhancement to the public realm along the Green Street and Enstone Road frontage including new parking provision and access driveway crossing and related highway works to be discussed with officers.
Travel	<ul style="list-style-type: none"> • Travel Plan • Travel Plan monitoring • CPZ • Car Club membership • Car Club space
Energy	<ul style="list-style-type: none"> • Carbon Offset Payment towards the Carbon Offset Fund • <i>Monitoring ('Be Seen' – GLA Energy Monitoring Portal)</i>

Education	Education contribution
Management	Appointment of Managing Agents to operate a management company
Employment	<ul style="list-style-type: none"> • Contribution payable in line with Chapter 13 of Enfield's S106 Supplementary Planning Document • Employment and Skills Strategy
Health	Contribution towards health provision
Monitoring fee	Payment of the Council's costs associated with monitoring of the S106 agreement

17. Community Infrastructure Levy (CIL)

- 17.1 Both Enfield CIL and the Mayor of London CIL (MCIL) would be payable on this scheme to support the development of appropriate infrastructure.
- 17.2 The total amount of CIL owed is £1,531,654, although this figure does not account for social housing relief, which, once calculated, will reduce the CIL liability. A formal determination of the CIL liability would be made when a Liability Notice is issued should this application be approved.

18. Conclusion

- 18.1 The introduction of second stairs in Blocks B and C of the consented project brings incalculable benefit to the safety of the buildings and its occupants. This is an essential amendment, although it has consequential impacts. The stair cores have cut into floor plates, resulting in a reduction and reconfiguration of floorspace with an amended unit mix. The applicant has sought to make the changes within the approved massing so as not to affect the exterior design of the buildings. The application also seeks to modify the housing product and affordable housing component to bring it in line with a viability-tested level.
- 18.2 The reduction in affordable housing provision from 50% of habitable rooms (49% of units) as approved to 23% of habitable rooms (25% of units) is notable. The application demonstrates, through a viability assessment, that the present permission is not practicable and the amendments to housing type and affordable component will enable the project to move forward.
- 18.3 Having failed the statutory Housing Delivery Test, Enfield is in a position of "presumption in favour of sustainable development category", which means granting permission unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits. Under the present application, the provision of Build to Rent housing brings planning benefit as a beneficial housing type, which is an improvement from unregulated rental housing. Build to Rent is supported. The proposed breadth (25% of units) and depth (30% below local market rents) of affordable housing provides an intermediate-level affordable housing in a size mix that meets Enfield's evidenced needs.
- 18.4 Enfield's 2020 Housing Delivery Action Plan cites only 60% of Enfield's approvals being implemented. In 2021, Enfield delivered 67% of its Housing Delivery Test target for the preceding three-year period. The application reveals that the present permission is not currently viable. In order to improve the deliverability of this emerging site allocation for homes, the present proposal helps to render the development achievable. Early and late stage viability reviews will ensure that changing conditions enable the maximum affordable housing benefit is achieved.

- 18.5 The housing proposal deviates from policy in affordable housing tenures. All 37 affordable units are proposed as intermediate Discounted Market Rate homes. While this departs from policy that also seeks low-cost social accommodation, Build to Rent policy anticipates deliver of intermediate-rate homes as it maximises the breadth of affordable housing and can be managed within the Build to Rent typology efficiently. The viability submission confirms that this intermediate tenure achieves the greatest number of affordable units.
- 18.6 The unit size mix also departs from policy, although the mix is generally in line with the proportions of the unit mix approved under the extant permission and the unit mix proposed for the affordable housing component meets evidenced need.
- 18.7 On balance, the amendments to the approved application reference 20/01526/FUL introduce a safer, viable, deliverable and secure form of housing, including a considerable 25% of units as intermediate affordable housing. This application is recommended for approval.

Date: 20th May 2023
 Reference: 230520 - Pro_Scheme_Area_Schedule.



Amended Issue to LPA comments and request details
 20th June 2023
 Residential GIA

Floor Level	Plot Number	Unit Size	Flat Type	GIA (m ²)	Hab Rooms	Tenure (Affordable)	Tenure (Market)
Block A							
1	A 1.1	2B4P	FT A-A	74.1	3	1	
1	A 1.2	3B5P	FT A-B	92.5	4	1	
1	A 1.3	1B2P	FT A-C	50.3	2	1	
1	A 1.4	2B3P	FT A-D	66.2	3	1	
1	A 1.5	2B4P	FT A-E	74.7	3	1	
Subtotal				357.8	15	5	0
2	A 2.1	2B4P	FT A-A	74.1	3	1	
2	A 2.2	3B5P	FT A-B	92.5	4	1	
2	A 2.3	1B2P	FT A-C	50.3	2	1	
2	A 2.4	2B3P	FT A-D	66.2	3	1	
2	A 2.5	2B4P	FT A-E	74.7	3	1	
Subtotal				357.8	15	5	0
3	A 3.1	2B4P	FT A-A	74.1	3	1	
3	A 3.2	3B5P	FT A-B	92.5	4	1	
3	A 3.3	1B2P	FT A-C	50.3	2	1	
3	A 3.4	2B3P	FT A-D	66.2	3	1	
3	A 3.5	2B4P	FT A-E	74.7	3	1	
Subtotal				357.8	15	5	0
4	A 4.1	2B3P	FT A-F	68.6	3	1	
4	A 4.2	1B2P	FT A-G	52	2	1	
4	A 4.3	1B2P	FT A-H	50.5	2	1	
4	A 4.4	1B2P	FT A-I	55.8	2	1	
Subtotal				226.9	9	4	0
Block A Total (Units)					54	19	0
Total Block A (Areas)				1300.3			

Block B							
2	B 2.1	2B4P	FT B-A	74.5	3		1
2	B 2.2	2B4P	FT B-B	75.5	3		1
2	B 2.3	2B3P	FT B-C	63.1	3	1	
2	B 2.4	1B2P	FT B-D	50.6	2	1	
2	B 2.5	1B2P	FT B-E	52	2	1	
2	B 2.6	2B4P	FT B-F	81	3		1
Subtotal				396.7	16	3	3
3	B 3.1	2B4P	FT B-A	74.5	3		1
3	B 3.2	2B4P	FT B-B	75.5	3		1
3	B 3.3	3B5P	FT B-G	89	4		1
3	B 3.4	3B5P	FT B-H	95	4	1	
3	B 3.5	2B4P	FT B-F	81	3		1
Subtotal				415	17	1	4
4	B 4.1	2B4P	FT B-A	74.5	3		1
4	B 4.2	2B4P	FT B-B	75.5	3		1
4	B 4.3	3B5P	FT B-G	89	4		1
4	B 4.4	3B5P	FT B-H	95	4		1
4	B 4.5	2B4P	FT B-F	81	3		1
Subtotal				415	17	0	5
5	B 5.1	2B4P	FT B-A	74.5	3		1
5	B 5.2	2B4P	FT B-B	75.5	3		1
5	B 5.3	3B5P	FT B-G	89	4		1
5	B 5.4	3B5P	FT B-H	95	4		1
5	B 5.5	2B4P	FT B-F	81	3		1
Subtotal				415	17	0	5
6	B 6.1	2B4P	FT B-A	74.5	3		1
6	B 6.2	2B4P	FT B-B	75.5	3		1
6	B 6.3	3B4P	FT B-I	81	4		1

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20th June 2023

6	B 6.4	1B2P	FT B-J	50	2	1	
6	B 6.5	1B2P	FT B-K	50	2	1	
6	B 6.6	2B4P	FT B-F	81	3		1
Subtotal				412	17	2	4
7	B 7.1	2B4P	FT B-A	74.5	3		1
7	B 7.2	2B4P	FT B-B	75.5	3		1
7	B 7.3	3B4P	FT B-I	81	4		1
7	B 7.4	1B2P	FT B-J	50	2	1	
7	B 7.5	1B2P	FT B-K	50	2	1	
7	B 7.6	2B4P	FT B-F	81	3		1
Subtotal				412	17	2	4
8	B 8.1	1B2P	FT B-N	50	2		1
8	B 8.2	2B4P	FT B-B	75.5	3		1
8	B 8.3	3B4P	FT B-I	81	4		1
8	B 8.4	1B2P	FT B-J	50	2		1
8	B 8.5	1B2P	FT B-L	50	2		1
8	B 8.6	2B3P	FT B-M	61	3		1
Subtotal				367.5	16	0	6
9	B 9.1	1B2P	FT B-N	50	2		1
9	B 9.2	2B4P	FT B-B	75.5	3		1
9	B 9.3	3B4P	FT B-I	81	4		1
9	B 9.4	1B2P	FT B-J	50	2		1
9	B 9.5	1B2P	FT B-L	50	2		1
9	B 9.6	2B3P	FT B-M	61	3		1
Subtotal				367.5	16	0	6
10	B 10.1	1B2P	FT B-N	50	2		1
10	B 10.2	2B4P	FT B-B	75.5	3		1
10	B 10.3	3B4P	FT B-I	81	4		1
10	B 10.4	1B2P	FT B-J	50	2		1
10	B 10.5	1B2P	FT B-L	50	2		1
10	B 10.6	2B3P	FT B-M	61	3		1
Subtotal				367.5	16	0	6
11	B 11.1	1B2P	FT B-N	50	2		1
11	B 11.2	2B4P	FT B-B	75.5	3		1
11	B 11.3	3B4P	FT B-I	81	4		1
11	B 11.4	1B2P	FT B-J	50	2		1
11	B 11.5	1B2P	FT B-L	50	2		1
11	B 11.6	2B3P	FT B-M	61	3		1
Subtotal				367.5	16	0	6
12	B 12.1	1B2P	FT B-O	51	2		1
12	B 12.2	2B4P	FT B-P	71.7	3		1
12	B 12.3	2B3P	FT B-Q	65	3		1
12	B 12.4	1B2P	FT B-R	52.7	2		1
Subtotal				240.4	10	0	4
13	B 13.1	1B2P	FT B-O	51	2		1
13	B 13.2	2B4P	FT B-P	71.7	3		1
13	B 13.3	2B3P	FT B-Q	65	3		1
13	B 13.4	1B2P	FT B-R	52.7	2		1
Subtotal				240.4	10	0	4
14	B 14.1	1B2P	FT B-O	51	2		1
14	B 14.2	2B4P	FT B-P	71.7	3		1
14	B 14.3	2B3P	FT B-Q	65	3		1
14	B 14.4	1B2P	FT B-R	52.7	2		1
Subtotal				240.4	10	0	4
15	B 15.1	1B2P	FT B-O	51	2		1
15	B 15.2	2B4P	FT B-P	71.7	3		1
15	B 15.3	2B3P	FT B-Q	65	3		1
15	B 15.4	1B2P	FT B-R	52.7	2		1
Subtotal				240.4	10	0	4
Block B Total (Units)					205	8	65
Total Block B (Areas)				4897.3			

Date: 20th May 2023
Reference: 230520 - Pro_Scheme_Area_Schedule.



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Block C							
2	C 2.1	2B4P	FT C-A	71	3		1
2	C 2.2	2B3P	FT C-B	61.4	3		1
2	C 2.3	2B3P	FT C-C	71.1	3		1
2	C 2.4	1B2P	FT C-D	51.6	2	1	
2	C 2.5	1B2P	FT C-E	56.4	2	1	
2	C 2.6	1B2P	FT C-F	56.7	2	1	
Subtotal				368.2	15	3	3
3	C 3.1	2B4P	FT C-A	71	3		1
3	C 3.2	2B3P	FT C-G	66.2	3		1
3	C 3.3	2B4P	FT C-H	80	3		1
3	C 3.4	1B2P	FT C-D	51.6	2	1	
3	C 3.5	1B2P	FT C-E	56.4	2	1	
3	C 3.6	2B4P	FT C-1	72.1	3		1
Subtotal				397.3	16	2	4
4	C 4.1	2B4P	FT C-A	71	3		1
4	C 4.2	2B3P	FT C-G	66.2	3		1
4	C 4.3	2B4P	FT C-H	80	3		1
4	C 4.4	1B2P	FT C-D	51.6	2	1	
4	C 4.5	1B2P	FT C-E	56.4	2	1	
4	C 4.6	2B4P	FT C-1	72.1	3		1
Subtotal				397.3	16	2	4
5	C 5.1	2B4P	FT C-A	71	3		1
5	C 5.2	2B3P	FT C-G	66.2	3		1
5	C 5.3	2B4P	FT C-H	80	3		1
5	C 5.4	1B2P	FT C-D	51.6	2	1	
5	C 5.5	1B2P	FT C-E	56.4	2	1	
5	C 5.6	2B4P	FT C-1	72.1	3		1
Subtotal				397.3	16	2	4
6	C 6.1	2B4P	FT C-A	71	3		1
6	C 6.2	2B3P	FT C-G	66.2	3		1
6	C 6.3	2B4P	FT C-H	80	3		1
6	C 6.4	1B2P	FT C-D	51.6	2	1	
6	C 6.5	1B2P	FT C-E	56.4	2		1
6	C 6.6	2B4P	FT C-1	72.1	3		1
Subtotal				397.3	16	1	5
7	C 7.1	2B4P	FT C-A	71	3		1
7	C 7.2	2B3P	FT C-G	66.2	3		1
7	C 7.3	2B4P	FT C-H	80	3		1
7	C 7.4	1B2P	FT C-D	51.6	2		1
7	C 7.5	1B2P	FT C-E	56.4	2		1
7	C 7.6	2B4P	FT C-1	72.1	3		1
Subtotal				397.3	16	0	6
8	C 8.1	1B2P	FT C-L	50	2		1
8	C 8.2	2B3P	FT C-G	66.2	3		1
8	C 8.3	2B4P	FT C-H	80	3		1
8	C 8.4	1B2P	FT C-D	51.6	2		1
8	C 8.5	1B2P	FT C-J	51	2		1
8	C 8.6	1B2P	FT C-K	54	2		1
Subtotal				352.8	14	0	6
9	C 9.1	1B2P	FT C-L	50	2		1
9	C 9.2	2B3P	FT C-G	66.2	3		1
9	C 9.3	2B4P	FT C-H	80	3		1
9	C 9.4	1B2P	FT C-D	51.6	2		1
9	C 9.5	1B2P	FT C-J	51	2		1
9	C 9.6	1B2P	FT C-K	54	2		1
Subtotal				352.8	14	0	6
10	C 10.1	1B2P	FT C-M	61	2		1
10	C 10.2	1B2P	FT C-N	52.3	2		1
10	C 10.3	2B3P	FT C-O	64	3		1
10	C 10.4	1B2P	FT C-P	50	2		1
Subtotal				227.3	9	0	4
11	C 11.1	1B2P	FT C-M	61	2		1
11	C 11.2	1B2P	FT C-N	52.3	2		1
11	C 11.3	2B3P	FT C-O	64	3		1
11	C 11.4	1B2P	FT C-P	50	2		1
Subtotal				227.3	9	0	4
Block C Total (Units)					141	10	46
Total Block C (Areas)				3514.9			

Date: 20th May 2023
Reference: 230520 - Pro_Scheme_Area_Schedule.



Amended Issue to LPA comments and request details
20th June 2023

Commercial GIA

Block	Floor Level	Unit	GIA (m ²)
A	0	1	317.5
B	0	2	66.1
C	0	3	352.5
C	1	3	394.5
Total			1130.6

Other Areas

Block	Floor Level	Unit Type	NIA (m ²)
A	0	Flexible Commercial	251.1
A	0	bins 1	7.2
A	0	bins 2	15.7
A	0	Core bins	21.8
A	0	Cycle Store	29.3
A	0	Plant	36.4
A	0	Core Plant	8.7
Subtotal			370.2
B	0	Flexible Commercial	66.2
B	0	Core Lobby	57.8
B	0	Core Bins	31.8
B	0	Sub-station	21.9
B	0	Switch Room	11.7
B	0	room	11.7
B	0	Cycle Store	78.2
B	1	Boiler Plant	124.2
B	2	Water Plant	33
Subtotal			436.5
C	0	Commercial	261.4
C	0	Cycle Store 1	39.8
C	0	Cycle Store 2	56.2
C	0	Core Lobby	55.2
C	0	Bins	15.6
C	0	Core Bins	34.6
C	0	Safety Room	8.6
C	1	Commercial	373
C	1	Plant Room	21.8
B & C	0	Parking	665.9
B & C	1	Parking	682
Subtotal			2214.1
Total			3020.8

Date: 20th May 2023
Reference: 230520 - Pro_Scheme_Area_Schedule



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20th June 2023

Residential Units

Floor Level	1B 2P	2B 3P	2B 4P	3B 4P	3B 5P	Total Units	Hab Rooms	Tenure (Affordable)	Tenure (Market)
Block A									
Ground	-	-	-	-	-	-	-	-	-
First	1	1	2	-	1	5	15	5	0
Second	1	1	2	-	1	5	15	5	0
Third	1	1	2	-	1	5	15	5	0
Fourth	3	1	-	-	-	4	9	4	0
TOTAL	6	4	6	0	3	19	54	19	0

Block B									
Ground	-	-	-	-	-	-	-	-	-
First	-	-	-	-	-	-	-	-	-
Second	2	1	3	-	-	6	16	3	3
Third	-	-	3	-	2	5	17	1	4
Fourth	-	-	3	-	2	5	17	0	5
Fifth	-	-	3	-	2	5	17	0	5
Sixth	2	-	3	1	-	6	17	2	4
Seventh	2	-	3	1	-	6	17	2	4
Eighth	3	1	1	1	-	6	16	0	6
Ninth	3	1	1	1	-	6	16	0	6
Tenth	3	1	1	1	-	6	16	0	6
Eleventh	3	1	1	1	-	6	16	0	6
Twelfth	2	1	1	-	-	4	10	0	4
Thirteenth	2	1	1	-	-	4	10	0	4
Fourteenth	2	1	1	-	-	4	10	0	4
Fifteenth	2	1	1	-	-	4	10	0	4
TOTAL	26	9	26	6	6	73	205	8	65

Block C									
Ground	-	-	-	-	-	-	-	-	-
First	-	-	-	-	-	-	-	-	-
Second	3	2	1	-	-	6	15	3	3
Third	2	1	3	-	-	6	16	2	4
Fourth	2	1	3	-	-	6	16	2	4
Fifth	2	1	3	-	-	6	16	2	4
Sixth	2	1	3	-	-	6	16	1	5
Seventh	2	1	3	-	-	6	16	0	6
Eighth	4	1	1	-	-	6	14	0	6
Ninth	4	1	1	-	-	6	14	0	6
Tenth	3	1	-	-	-	4	9	0	4
Eleventh	3	1	-	-	-	4	9	0	4
TOTAL	27	11	18	0	0	56	141	10	46

TOTAL UNITS									
Floor Level	1B 2P	2B 3P	2B 4P	3B 4P	3B 5P	Total Units	Hab Rooms	Tenure (Affordable)	Tenure (Market)
BLOCK A	6	4	6	0	3	19	54	19	0
BLOCK B	26	9	26	6	6	73	205	8	65
BLOCK C	27	11	18	0	0	56	141	10	46
TOTAL	59	24	50	6	9	148	400	37	111

Date: 20th May 2023
 Reference: 230520 - Pro_Scheme_Area_Schedule,



Amended Issue to LPA comments and request details
 20th June 2023

Tenure Breakdown

	UNITS	Percentage
AFFORDABLE	37	25%
MARKET	111	75%
Percentage	100%	

	HABITABLE ROOMS	Percentage
AFFORDABLE	93	23%
MARKET	307	77%
Percentage	100%	

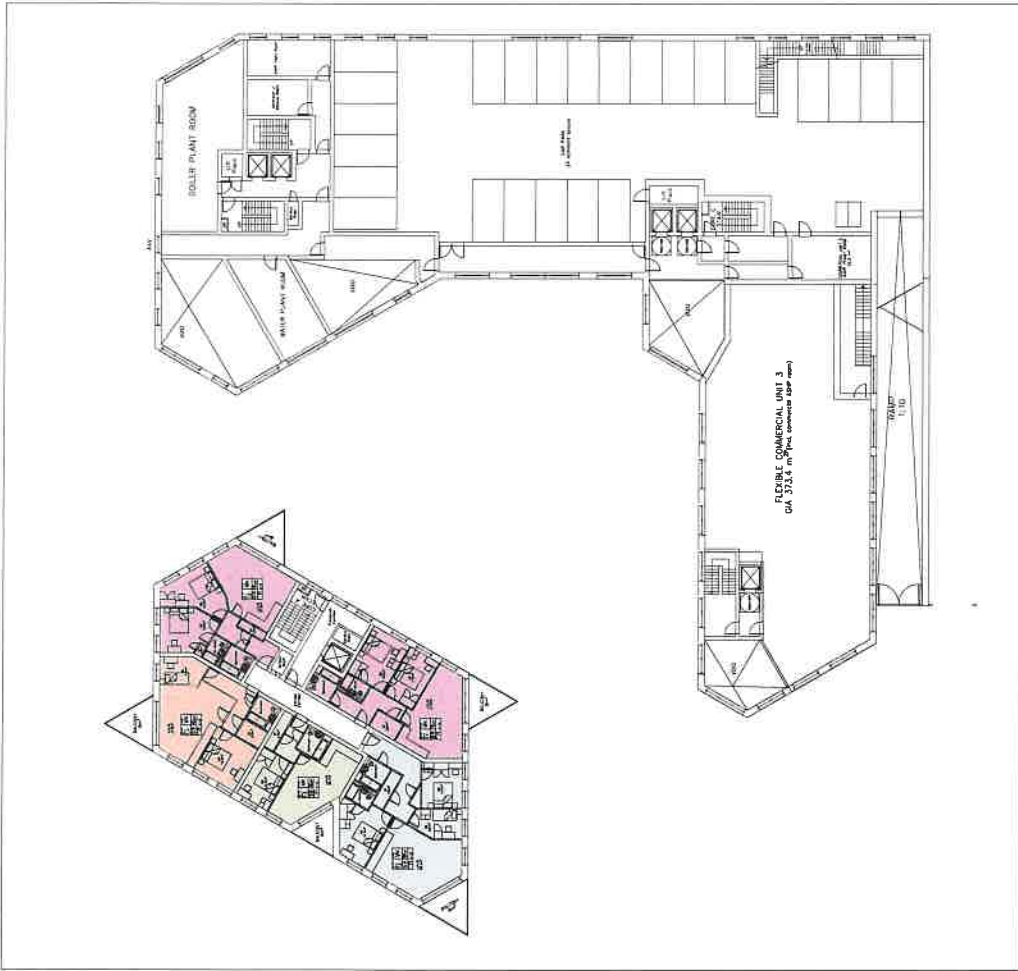
AFFORDABLE							
	1B 2P	2B 3P	2B 4P	3B 4P	3B 5P	Total Units	Percentage
BLOCK A	6	4	6		3	19	13%
BLOCK B	6	1	0		1	8	5%
BLOCK C	10					10	7%
Percentage	15%	3%	4%	0%	3%	25%	

MARKET							
	1B 2P	2B 3P	2B 4P	3B 4P	3B 5P	Total Units	Percentage
BLOCK A						0	0%
BLOCK B	24	8	24	6	3	65	44%
BLOCK C	17	11	18			46	31%
Percentage	28%	13%	28%	4%	2%	75%	

NOTES

1. All spaces are shown with their intended use. The architect is not responsible for the accuracy of the information provided. The architect is not responsible for the accuracy of the information provided. The architect is not responsible for the accuracy of the information provided.

- 1 bed 2 people
- 2 bed 3 people
- 2 bed 4 people
- 3 bed



Plan A - 1560 PL 1211 - A1 - Approved by LPA comments

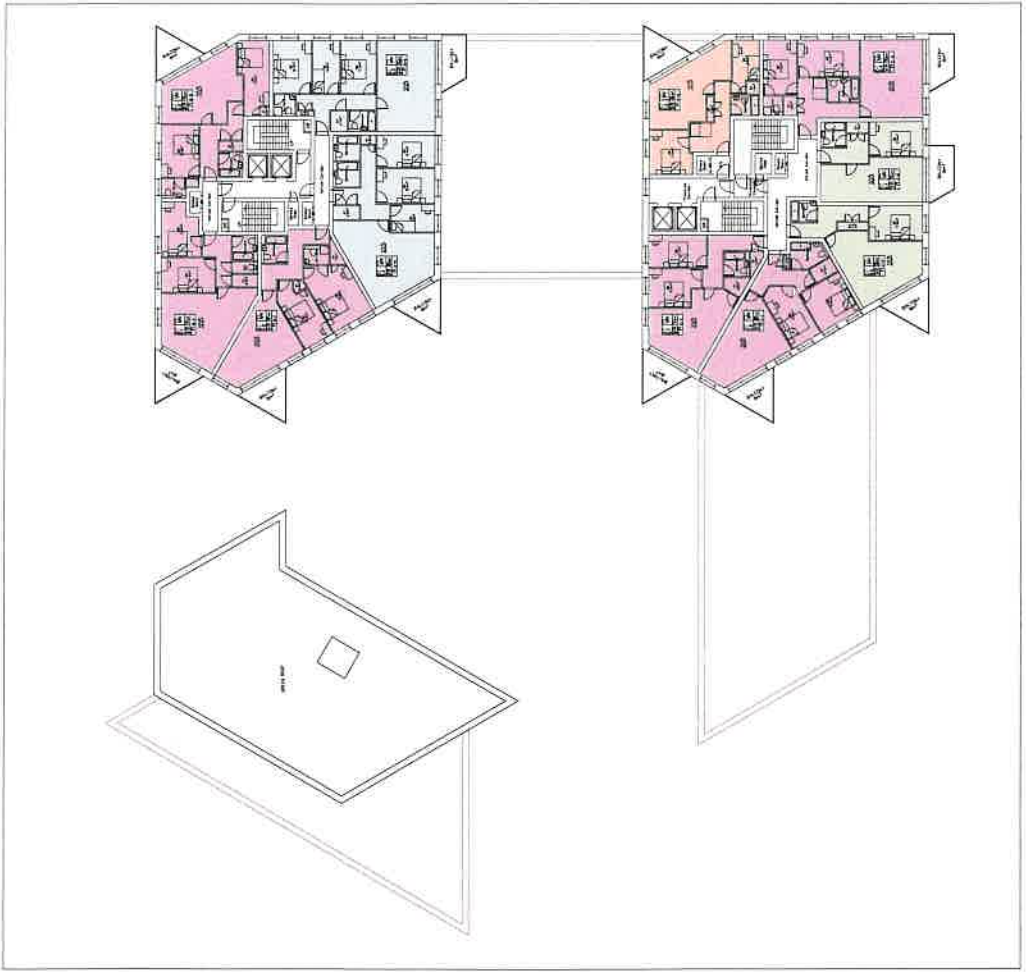
PLANNING
Stonegate
Green Street, Enfield
Proposed Floor Plans
First Floor Plan
 Date: 15/03/2023
 Drawing No: 1560.PL.1211
 Scale: A





NOTES
See typical specifications, floor levels and
room schedules for details of construction
materials and finishes. All work to be done
in accordance with the Building Regulations
and the relevant standards.

- 1 bed 2 people
- 2 bed 3 people
- 2 bed 4 people
- 3 bed



Rev A - 06/05/23 - TL - Amended to LPA comments

Rev No: 01 - Civil Description

Project: PLANNING

Location: Stonegate

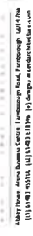
Address: Green Street, Enfield

Client: Green Lane

Project Name: Proposed Floor plans

Project No: 1560.PL.1215

Scale: A



1560 Green Lane, Enfield, London, EN2 6BQ
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Proposed Fifth Floor Plan



NOTES

Use legend throughout with blue markings only when an area is highlighted. Use red markings to indicate areas to be highlighted in the next iteration. Use green markings to indicate areas to be highlighted in the next iteration. Use the drawing title or legend for more information.

1 bed 2 people



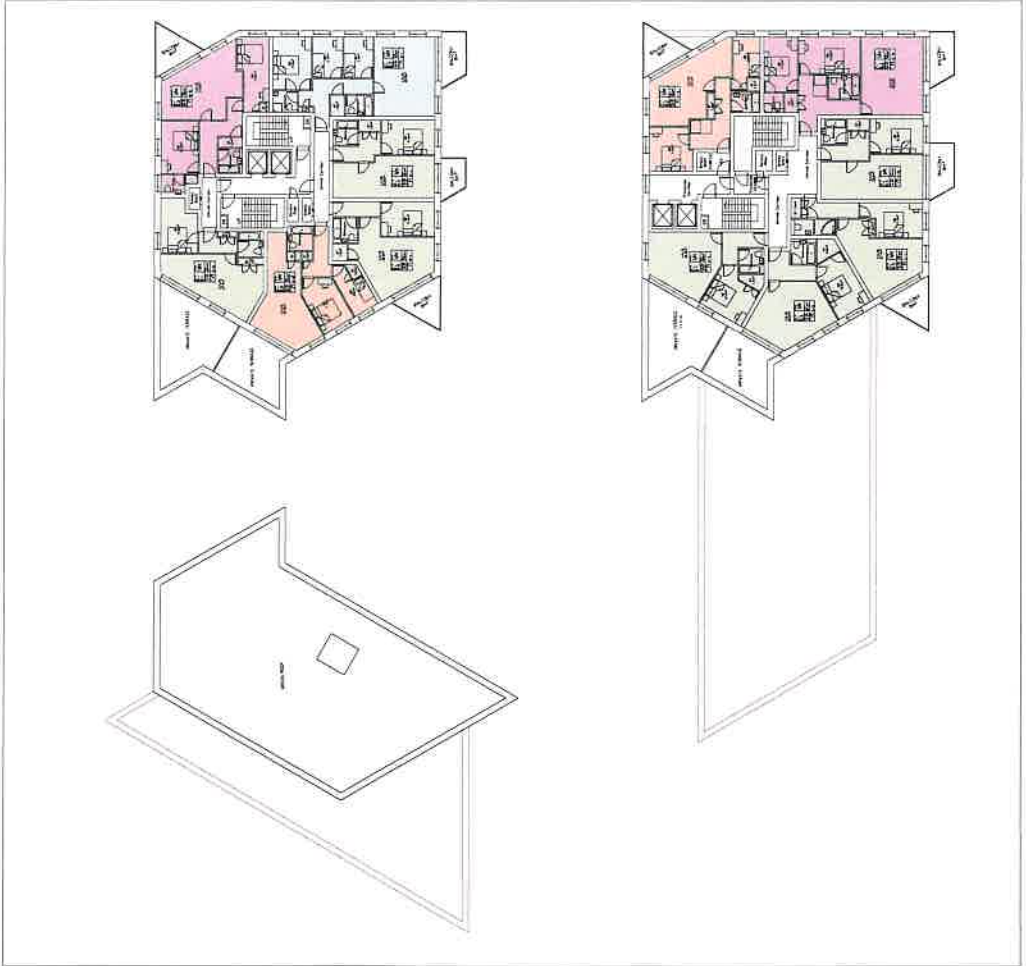
2 bed 3 people



2 bed 4 people



3 bed



Rev A - 05/05/23 - TL - AT - Amended to DPA comments

Rev 001 - 05/05/23 - 001

PLANNING

project

Stonegate

location

Green Street, Enfield

drawing title

Proposed Floor Plans

Eighth Floor Plan

date

05/05/23

drawn by

TL

checked by

AT

scale

1:500

Proposed Eighth Floor Plan



Scale: 1:200 @ A1

accord

Architectural & Planning
15560 PL 1218
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