

## **1 INTRODUCTION**

- 1.1 This Planning Statement has been prepared by KR Planning on behalf of Glenthorne Group (hereafter referred to as 'the Applicant') to accompany a planning application to the London Borough of Enfield in respect of the proposed development at 26 Cecil Road, EN2.
- 1.2 This application is for a proposed development which comprises the demolition of the existing family dwelling and the construction of a three storey with a set back fourth storey residential block consisting of 8 units with secured access from Cecil Road and associated landscaping works with provision for refuse store, cycle spaces and an accessible visitor parking space. The proposal provides a mix of dwelling types suitable for individuals, couples and families comprising of 1, 2 & 3 bedroom units with private amenity space per dwelling
- 1.3 The overall objective of the scheme is to provide a high quality development at this site whilst safeguarding neighbouring amenity and retaining the character of the area.

## **2 THE SITE & PROPOSAL.**

- 2.1 The application site lies on the north side of Cecil Road (A110) close to Enfield town centre with the Palace Exchange Shopping Centre and multi-storey car park directly to the north of the site. Situated in between Enfield Town Underground station and Enfield Chase Station, Cecil Road forms a boundary edge dominated by traffic and can be characterised as being a back land service area for the town centre.
- 2.2 To the west of the site, there is the red brick Edwardian Enfield Town Library and contemporary extension completed in 2009 and to the east of the site, is the former telephone exchange building, a Neo-Georgian style building. To the south of Cecil Road are generous semi-detached Edwardian houses with large pitched roofs and generous floor to ceiling heights.
- 2.3 26 Cecil Road and its neighbour, no. 24 on the corner of Sarnsfield Road are unusual in the streetscape as they are not only smaller in scale to the adjoining properties but are the only remaining small-scale houses on the north side of the road and situated amongst predominately civic, commercial and ecclesiastical uses moving further east on Cecil Road. The urban context on the north side therefore could be characterised as being primarily public with the civic buildings such as the library, Baptist Church and the former telephone exchange and the over-bearing Palace Gardens complex behind with residential housing to the south of Cecil Road. In the wider context of Enfield Town, there are a number of properties in a contemporary style with the arrival of Bole Court and the Enfield Community Church located adjacent to it.
- 2.4 The surrounding properties are generally three to four storeys high but with what appears to be generous floor to ceiling heights making them much taller than what is considered an average floor to floor storey height.

### 3 PLANNING POLICY

3.1 This section of the Statement provides an analysis of the planning policy context in which the proposed development should be considered in accordance with the relevant planning legislation and national policy guidance.

3.2 Planning decisions in England and Wales should be taken in accordance with the development plan unless material considerations indicate otherwise. This statutory requirement is set out in Section 38(6) of the Planning and Compulsory Purchase Act 2004.

Development Management Policies (2013)

3.3 While not forming part of the statutory development plan, the following documents remain important material considerations for the determination of planning applications in Enfield:

- National Planning Policy Framework (NPPF) (2018);
- National Planning Practice Guidance (NPPG) (2014);
- Supplementary Planning Guidance and Documents; and
- Local Plan Evidence Base.

The most relevant extracts of these documents are analysed in more detail below.

National Planning Policy Framework (2018)

3.4 The revised National Planning Policy Framework ("Framework") published in July 2018 sets out the government's planning policies for England. Paragraph 11 emphasises that at the heart of the Framework is a presumption in favour of sustainable development. Decision makers should look to approve development proposals that accord with up to date Development Plan policies without delay.

3.5 Part 2 of the Framework explains that the purpose of the planning system is to achieve sustainable development which has three interdependent objectives:

- 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;
- 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

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services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and

- 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.

3.6 Paragraph 38 says local authorities should approach decisions on proposed development in a positive and creative way. In relation to housing, paragraph 68 says that small sites can make an important contribution to meeting the housing requirement of an area and they are often built relatively quickly. The development of such sites is encouraged and local planning authorities must identify sufficient land to accommodate at least 10% of their housing requirement on sites no larger than 1 hectare.

3.7 Section 9 promotes sustainable transport. Paragraph 103 it says the planning system should actively manage patterns of growth in support of sustainable transport by focussing significant development in accessible locations where the need to travel is limited and there is a genuine choice of transport modes. This can help to reduce congestion and emissions and improve air quality and public health.

3.8 Paragraph 109 states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety or the residual cumulative impacts on the road network would be severe.

3.9 Paragraph 110 requires applications for development to:

- give priority to pedestrian and cycle movements to facilitating access to and encourage use of public transport;
- address the needs of people with disabilities and reduced mobility in relation to all modes of transport;
- create places that are safe, secure and attractive which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter and respond to local character and design standards
- allow for the efficient delivery of goods and access by service and emergency vehicles; and
- include provisions for electric vehicles.

- 3.10 Paragraph 111 says all developments that will generate significant amounts of movement should provide a travel plan and be supported by a transport assessment so that the likely impacts of the proposal can be assessed.
- 3.11 Section 11 focusses on making effective use of land. Paragraph 118 (c) and (d) says that planning decisions should give substantial weight to the value of using suitable brownfield land for homes and the use of under-utilised buildings especially for housing should be promoted. Additionally, 118 (e) gives support for taking opportunities to develop the airspace above commercial premises for new homes where these would be compatible with the streetscene and not harm the amenity of neighbours.
- 3.12 Paragraph 123 stresses local authorities should plan for land to be used effectively with density optimised and intensified at town centre locations that are well served by public transport.
- 3.13 Section 12 addresses the need for good quality design. Paragraph 124 explains that the creation of high quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Paragraph 127 says planning decisions should ensure that developments:
- will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
  - are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
  - are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);
  - establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;
  - optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and
  - create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users<sup>46</sup>; and where crime and disorder,

and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

3.14 Paragraph 130 says:

*"Permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions, taking into account any local design standards or style guides in plans or supplementary planning documents. Conversely, where the design of a development accords with clear expectations in plan policies, design should not be used by the decision-maker as a valid reason to object to development."*

3.15 Paragraph 131 says:

*"In determining applications, great weight should be given to outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings."*

3.16 Section 14 addresses environmental matters including climate change and flood risk with development to aim to minimise energy consumption and be designed with renewable energy, a low-carbon future and minimisation of flooding and control of water run-off in mind.

National Planning Practice Guidance (2014)

3.17 The Government launched the Planning Practice Guidance web-based resource in March 2014.

3.18 Paragraph 001 of Design states good quality design is an integral part of sustainable development. Achieving good design is about creating place, buildings, or spaces that work well for everyone, look good, last well, and will adapt to the needs of future generations.

3.19 Paragraph 040 of Design states that well designed housing should be functional, attractive and sustainable. It should also be adaptable to the changing needs of its occupants.

3.20 Paragraph 002 of Health and Wellbeing states that the decision making process can consider how development proposals can support strong, vibrant and healthy communities and help create healthy living environments.

London Plan

- 3.21 This is the overall strategic plan for London, setting out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years.
- 3.22 Policy GG2 of the new London Plan states that to create successful mixed-use places that make the best use of land, policies must enable the development of brownfield land, prioritise sites which are well connected to public transport and apply a design-led approach to determine the optimum development capacity of sites. The policy also supports car-free developments, supporting a target of 80% of all journeys using sustainable travel, allowing for an efficient use of land (as required the Mayor's Transport Strategy).
- 3.23 The new London Plan Policy GG4 aims to create a housing market that ensures that more homes are delivered, are genuinely affordable, and creates mixed use and inclusive communities
- 3.24 Policy GG5 of the New London Plans aims to conserve and enhance London's global economy to ensure that economic success is shared amongst all Londoners. The policy notes that those involved in development should promote the strength and potential of the wider city region, diversify the economy, plan for sufficient employment space and ensure that high-quality and affordable housing are provided as well as social infrastructure to support London's growth. This policy also aims to promote London's rich culture and heritage and make the fullest use of the Capital's existing and future public transport, walking and cycling networks.
- 3.25 Policy D3 of the new London Plan relates to all development and seeks to make the best use of land by following a design-led approach that optimises the capacity of sites. This policy notes that the design -led approach requires consideration of design options to determine the most appropriate form of development that responds to the site context and capacity for growth.
- 3.26 Policy D4 of the new London Plan outlines that Design and Access Statements submitted with development proposals should demonstrate that the design meets the requirements of the London Plan.
- 3.27 Policy HC1D of the new London Plan outlines that developments should identify assets of archaeological significance and use this information to avoid harm or minimise it through appropriate mitigation.

LB of Enfield Core Strategy (2010)

3.28 The Borough's Core Strategy as the strategic element of the LDF, it provides only half the picture. By Statutory definition<sup>1</sup>, the Core Strategy can only provide statements of:

- the development and use of land which the local planning authority wish to encourage during any specified period;
- objectives relating to design and access which the local planning authority wish to encourage during any specified period;

3.29 Pursuant to Core Policy 2, the majority of dwelling completions are intended to come from small sites such as the application site. Given the intention outlined at para 5.5 of exceeding the London Plan Housing Targets, sites such as the application site will assist in meeting this target. Core Policy 3 deals with affordable housing, relevant commentary is provided within the affordable housing statement submitted with the application. Core Policy 4 is an aspirational policy, which advises that detail will be included within a Development Management Plan that has not yet been written. Core Policy 5 seeks specific % of unit types, but again defers the implementation to the DMP.

3.30 Core Policy 30 is an aspirational design policy, but which again defers its decision making criteria to the production of other documents not yet in the public domain. The Appellant would note that the enactment of the Planning Act 2008 provides for an amendment to S39 of the Planning and Compulsory Purchase Act 2004, to require LPA's, when complying with their S.39 duty to achieve sustainable development, to have regard (in particular) to the desirability of achieving good design.

Enfield Development Management Document (2014)

3.31 Policy DMD 3 requires a mix of homes of different sizes, but defers the % mix back to CP5 as follows:

- A mix of different sized homes should be provided in line with the targets in Core Strategy Policy 5

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<sup>1</sup> SI 2004/2204



- 3.32 Policy DMD6 – states that development will be permitted if it complies with the London Plan density matrix and: is of a scale and form that is appropriate to the existing pattern of development or setting; delivers a housing output that has regard to policies on housing mix; achieves a high quality of design and standard of accommodation, in line with the relevant policies; is of a density that considers existing or planned transport capacity, and; is of a density that taken into account existing and plan local facilities, such as shops, public open space and community facilities. Policy DMD 6 goes on to state that development exceeding the London Plan density ranges will only be permitted in the Council's regeneration areas where this can be justified through the development of a masterplan/planning brief where there are opportunities to comprehensively consider and address the issues
- 3.33 Policy DMD8 – requires new residential development to: be appropriately located, taking into account its surrounding context; be of an appropriate scale, bulk and massing; preserve amenity; meet or exceed the minimum space standards in the London Plan; provide a well-designed and functional layout with adequate sized rooms; meet Lifetime Homes Standards and provide 10% wheelchair accessible/easilyadaptable units; provide high-quality amenity space in line with Policy DMD9, and; provide adequate access, parking and refuse storage which do not adversely affect the quality of the street scene.
- 3.34 Policy DMD9 – Part 1 of this policy requires new development to provide good quality private amenity space that is not significantly overlooked and meets or exceeds the Council's minimum private amenity space standards, which range from 4sqm for a 1b1p dwelling to 9sqm for a 4b6p dwelling, where these dwellings have access to communal amenity space. Part 2 of this policy states that the communal amenity space for such dwellings should: not be publicly accessible; provide a functional area of amenity space having regard to the proposed housing mix/types; be overlooked by surrounding development (existing and/or proposed); be accessible to wheelchair users and other disabled people and; have suitable management arrangements in place.
- 3.35 Policy DMD37 – Part 1 of this policy states that development that is not suitable for its intended function, is inappropriate to its context, or fails to have appropriate regard to its surroundings will be refused. Part 2 of this policy states that development should capitalise on the available opportunities for improving an area in accordance with the following urban design objectives:
- Character: Locally distinctive or historic patterns of development, landscape and culture that make a positive contribution to quality of life and a place's identity should be reinforced;
  - Continuity and Enclosure: Public and private spaces and buildings are clearly distinguished, safe and secure;

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- Quality of the Public Realm: Safe, attractive, uncluttered and effective spaces and routes should be provided;
  - Ease of Movement: Development should be inclusive, easy for all to get to and move around, connect well with other places, put people before private vehicles and integrate land uses with sustainable modes of transport;
  - Legibility: Development should be easy to understand with recognisable and intuitive routes, intersections and landmarks; design and materials should ensure long term resilience and minimise ongoing maintenance;
  - Diversity: Where appropriate, development should provide variety and choice through the provision of a mix of compatible uses that work together to create viable places that respond to local needs. Part 3 of this policy seeks to ensure that development creates safe and secure place and complies with the principles of Secured by Design.
- 3.36 Policy DMD38 – Part 1 of this policy requires applications to be accompanied by Design and Access Statement that clearly document the design evolution and rationale. Part 2 of this policy requires Design and Access Statements to meet national requirements and include: a site analysis including site constraints, opportunities and assessment of the context and how this may influence the design; an explanation of how the design addresses the opportunities and constraints presented by the site, and; direct references to how the design complies with relevant planning policy and guidance. Part 3 of this policy states that application will be considered at Design Review Panels where appropriate.
- 3.37 Policy DMD43 – states that tall buildings will not be acceptable in areas classified as inappropriate, such as within the boundary or in the immediate vicinity of, or along views to or from Conservation Areas, Listed Buildings, Schedules or Locally Listed Ancient Monuments, and Nationally or Locally Registered Historic Parks and Gardens.
- 3.38 Policy DMD44 – Part 1 of this policy states that applications for development that fails to conserve and enhance the special interest, significance or setting of a heritage asset will be refused. Part 2 of this policy states that the design, materials and detailing of development affecting heritage assets or their settings should conserve the asset in a manner appropriate to its significance. Part 3 of this policy requires all applications affecting heritage assets or their setting to include a Heritage Statement.

London Housing SPG

- 3.39 The SPG provides guidance on the implementation of housing policies in the 2015 London Plan and the 2016 Minor Alterations to the Plan.
- 3.40 Standards 26 states that a minimum of 5sqm of private outdoor space should be provided for 1-2 person dwellings and an extra 1 sqm should be provided for each additional occupant.
- 3.41 Standard 29 states that developments should minimise the number of single aspect dwellings and maximise the number of dual aspect dwellings.

#### 4 MATERIAL CONSIDERATIONS

Principle of development

- 4.1 The site is in residential use at present, so there can be no in-principle objection to additional residential use on the site, subject to considerations of matters such as good design and the quality of the development.

Housing Mix

- 4.2 The proposal will result in the creation of 5x1 bedrooms, 2x2 bedroom units and 1x 3bedroom units. Policy CP 5 of the Core Strategy is provided in full below:

*The Council will seek to ensure that new developments offer a range of housing sizes to meet housing need. Over the lifetime of the Core Strategy the Council will plan for 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 Council will seek a range of housing types in the intermediate sector, including affordable homes for families. The mix of intermediate housing sizes will be determined on a site by site basis and the Council will work with developers and other partners to agree an appropriate mix taking into account a range of factors including development viability and the affordability of potential users.*

*The density of residential development proposals should balance the need to ensure the most efficient use of land whilst respecting the quality and character of existing neighbourhoods and accessibility to transport and other infrastructure. The London Plan Density Matrix and area action plans for the Borough's strategic growth areas and the place shaping priority areas within them, will inform the density of proposals for housing developments.*

- 4.3 It is clear from the text of the policy that there is no requirement for 3 or 4 bed flats, which only specifies the provision of 1 and 2 bed flats. The reference to larger units is prescribed only for houses, and the GPDO specifically defines that a flat is not a house. It has been long standing law that policy cannot be interpreted in relation to the reasoned justification (see *Tesco v Dundee City Council*).
- 4.4 To that end, the Applicant has had regard to the Mayor's advice in the Outer London Commission Report which advises at para 3.1.8 that:

*Town centre housing could be particularly appropriate in addressing the needs of these smaller households*

- 4.5 And at para 3.1.26 that:

*Town centre housing is generally more suitable for certain types of people, usually non-family households. It is usually focused on smaller households of one to two persons that can be accommodated in one or two bed properties as these are easier to accommodate in higher density schemes.*

4.6 And concludes at para 3.1.28

*However as the Maccleanor Lavington et al report highlights, there are a number of reasons why the demand for family housing may not be as strong in town centres as elsewhere. These include a relative lack of facilities for children, remoteness from schools, lack of private garden/ outdoor space, greater noise levels than suburban locations, and restricted access to private parking. The morphology of higher density buildings also make family living less appealing as the ability to see the children at play in a communal play area from an apartment is critical, and this ability is largely removed in higher buildings. It should also be noted that focusing new town centre provision on the needs of smaller households can free up larger homes elsewhere, whether these be shared housing occupied by groups of younger people, or family homes occupied by older people.*

Quality of Accommodation

4.7 The National Technical Housing Standards requires a minimum floorspace areas and this is achieved. The proposed size of the single and double bedrooms all exceed the minimum nationally described space standards of 7.5sqm and 11.5sqm respectfully.

4.8 Standard 29 of the Housing SPG states that development should minimise the number of single aspect dwellings and seek to maximise on the number of dual aspect dwellings.

4.9 All of the units is dual aspect and as such the proposed units will comprise high quality accommodation for future occupants through sufficient floorspace, outlook and privacy.

Amenity Space

4.10 Standard 26 of the London Housing SPG and DMD 9 states that a minimum of 5sqm of private outdoor space should be provided for 1-2 person dwellings and an extra 1sqm should be provided for each additional occupant. Each unit is provided with a policy compliant level of amenity space, by way of either balcony or private garden provided for the GF units.

Community Infrastructure Levy.

4.11 The Community Infrastructure Levy Regulations stipulate that where a levy is in place, development is chargeable on all new floor space where dwellings within Use Class C3 are created. The proposal will involve the creation of 5 new residential dwellings and this will therefore be chargeable development.

Scale

- 4.12 Policy DMD6 states that proposals should reinforce and/or enhance local character and distinctiveness, and respond to their context in terms of scale, height and massing. The surrounding area comprises a mix of building heights, which is not unusual within the town centre context. The proposal, with a scale of 4-storeys with a mansard third floor is therefore considered an appropriate response to the site, having regard to the surrounding area, in accordance with policy requirements.
- 4.13 The proposal when viewed from the streetscene will be of a comparable height to the neighbouring building, seeking a scale and massing that reflects the existing building and the surrounding character.

#### Appearance

- 4.14 Policy DMD6 states that proposals should reinforce and/or enhance local character and distinctiveness, taking account of patterns of development, urban form and building typology. The proposal will comprise a scheme of high quality, proposing quality materials appropriate within the surrounding residential character.
- 4.15 The proposal has sought the use of an recessed floor to create a coherent design that is symmetrical in its appearance and an attractive feature within the streetscene. The solid to void ratio follows the

#### Transport – car & cycle parking

- 4.16 The site has a PTAL rating of 5, which is very good. Both the London Plan and DMD 45 of the DMD promote car-free development in locations with high public transport accessibility to avoid excessive car parking provision and traffic congestion and encourage alternative modes of transport such as walking, cycling and public transport

- 4.17 The development proposes no car parking spaces, save for disabled parking, which is considered appropriate in a town centre setting. Instead, 8 cycle parking spaces are proposed in a convenient and secure location, and we assume that the details of this would be agreed by condition.

Refuse

- 4.18 The refuse and recycling store is collected from kerbside collections, and this arrangement is intended to be the way forward. A condition can control this matter.

## 5 CONCLUSION

- 5.1 The proposal will create 8 residential units that will contribute to the housing need in the borough, where housing delivery numbers are low
- 5.2 Each residential unit will benefit from meeting the internal space standards as prescribed in London Plan policy 3.5 and the nationally described space standards, and the provision of external space where it can be achieved.
- 5.3 To emphasise just three of these public benefits:
- Plainly it is a benefit, a good thing, to make efficient use of a highly accessible site such as this, the NPPF [118] provides in terms that the re-use of this brownfield site is a matter to which substantial weight should be given.
  - Substantial weight should also be given to the provision of permanent housing. The importance of small sites to Enfield's housing land supply, and the policy support in the London Plan which will seek to apply a presumption in favour of developing small sites. It is important to understand that the London Plan housing targets are minima set below the lowest identified level of the acute need for housing because of a lack of capacity – i.e. sufficient known sites or opportunities – to meet even the lowest identified level of need; accordingly, the London Plan urges authorities – including by definition Enfield – to do better than the minimum targets and to supplement, to add to, housing land supply capacity.

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- The economic benefit derived from the construction phase of the development, both through employment but also spend in the wider economy.

5.4 In sum, the site is ripe for beneficial redevelopment. It presents an opportunity that must not be squandered. Of course, that must be subject to respecting the heritage context and residential amenity. These matters have however been given full, careful and considered attention. The result is a high-quality scheme, the key principles of which are agreed by the Council and the appeal should be allowed.

5.5 Overall the proposed development will provide a high quality development at this site whilst safeguarding neighbouring amenity and retaining the character of the area.