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Planning & Sustainability Statement

Demolition of existing building and erection of x2 dwellings, and associated works

19 Hertford Court
Green Lanes
London
N13 4DD

September 2023

Document Reference: 3314/AEMP
London Borough of Enfield

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Introduction

1. This Planning Statement ('Statement') has been prepared by Plainview Planning Ltd on behalf of Ms Goula Theodorou (the 'Applicant') in support of an application for the demolition of existing buildings and erection of x2 dwellings at 19 Hertford Court, Green Lanes, London N13 4DD (the 'Site').

2. The proposed description of development is:

"Demolition of existing building and erection of x2 dwellings, and associated works"

3. The planning application is accompanied by:

- Planning and Sustainability Statement prepared by Plainview Planning Ltd - September 2023
- Application Form prepared by Plainview Planning Ltd - September 2023
- Parking Stress Survey - prepared by Motion/Benchmark Data Collection - May 2022.
- CIL Form 1 - Additional Information prepared by Plainview Planning - August 2023
- Sustainable Drainage Proforma for Minor Development prepared by Plainview Planning Ltd - August 2023
- Design Statement - prepared by Urban and Rural Ltd - August 2023.
- Architectural drawings prepared by Urban & Rural Ltd - August 2023.
 - Existing Site Location Plan - 1649-01 Rev P1
 - Existing Site Plan - 1649-05 Rev P2
 - Proposed Site Plan - 1649-09 Rev P3
 - Existing & Proposed Ground Floor Plans -1649-10n Rev P4
 - Existing & Proposed First Floor Plans -1649-11 Rev P3
 - Proposed Second Floor Plans - 1649-12 Rev P3
 - Existing & Proposed Roof Plans - 1649-15 Rev P3
 - Existing & Proposed South Elevation - 1649-20 Rev P4
 - Existing & Proposed West Elevation - 1649-21 Rev P3
 - Existing & Proposed North Elevation and Section Looking West - 1649-22 Rev P3
 - Existing & Proposed East Elevation - 1649 - 23 Rev P3

Site

4. The Site is land at 19 Hertford Court which is accessed from Green Lanes.
5. The application site comprises a two storey brick building. The ground floor accommodates four garages, with the first floor an existing x2-bedroom flat (which is currently occupied) with a GIA of 62.6 sqm. An external staircase provides access/egress to the first floor flat. The roof is pitched.
6. The garages are currently vacant and have been for several years. They are too small for most modern cars.

Surrounding Area

7. The Site is flanked, to the south and east, by three, three storey blocks of flats. A row of single storey garages lie to the north with terraced, two storey houses with rear gardens beyond.
8. The wider vicinity of the Site is predominantly residential in nature with flatted development of three storeys particularly characteristic of the area.

Designations

9. The Site is not designated for any particular use in the Enfield Policies Map, albeit District and Local Centres lie to the north and south of the Site respectively.
10. It lies within Flood Zone 1 (lowest risk) and lies in a zone of Very Low Risk of Surface Water Flooding and does not have any associated trees or grassland.
11. The Site is not within a Conservation Area, nor does it have the protection of being a Grade I or II listed asset.

Accessibility

12. The Site is in PTAL 2 (low access to public transport services). However, there is very close access to bus services in the immediate vicinity (bus stop within 100m), and Winchmore Hill and Palmers Green train station all located within a 12 - 18 minute walk.

Proposal

13. The proposal is for:

“Demolition of existing building and erection of x2 dwellings, and associated works”

14. The proposal will provide x2 3-storey, 2 bedroomed dwellings with integral parking and private amenity space.

15. At ground floor level the proposal includes a kitchen/dining space, WC and incorporates a garage. There is also private amenity space to the rear.

16. At first floor level the proposal offers a double bedroom, family bathroom, living space, storage and a terrace to provide additional private outdoor amenity space.

17. The second floor provides an additional double bedroom with en-suite bathroom.

18. Separate cycle and bin storage is provided along with an Electric Vehicle Charging Point, per dwelling.

19. The second floor has dormer windows set into the roof pitch and PV panels on the roof.

20. The **GIA** of each dwelling is **95.1sqm**.

21. **Unit 1** has a private garden space of 26.8sqm plus a first floor terrace of 9.2 sqm.

Total private amenity space of : 37.8sqm.

22. **Unit 2** has a private garden space of 53.6sqm plus a first floor terrace of 9.2sqm.

Total private amenity space of : 62.8sqm.

23. Each proposed dwelling has a total storage space of **3sqm**.

Development Plan

24. Section 38(6) of the Planning and Compulsory Purchase Act 2004 and Section 70(2) of the Town and Country Planning Act 1990 require that planning applications be determined in accordance with the development plan, unless material considerations indicate otherwise.

25. The relevant policies against which to assess this proposal are contained in the development plan, which in this instance comprises:

- Enfield Core Strategy 2010 (ECS)
- Enfield Development Management Document 2014 (EDMD)
- London Plan 2021

26. Relevant Core Strategy 2010 policies include:

- SO4 - New Homes
- SO8 - Transportation and Accessibility
- SO10 - Built Environment
- CP2 - Housing Supply and Locations for New Homes
- CP4 - Housing Quality
- CP5 - Housing Types
- CP9 - Supporting Community Cohesion
- CP20 - Sustainable Energy Use and Energy Infrastructure
- CP21 - Delivering Sustainable Water Supply, Drainage and Sewerage Infrastructure
- CP30 - Maintaining and Improving the Quality of the Built and Open Environment
- CP32 - Pollution
- CP46 - Infrastructure Contributions

27. Relevant Development Management Document 2014 policies include:

- DMD3 - Providing a Mix of Different Sized Homes
- DMD 6 - Residential Character
- DMD7 - Development of Garden Land
- DMD8 - General Standards for New Residential Development
- DMD9 - Amenity Space
- DMD10 - Distancing

- DMD13 - Roof Extensions
- DMD37 - Achieving High Quality and Design-Led Development
- DMD38 - Design Process
- DMD45 - Parking Standards and Layout
- DMD47 - New Road, Access and Servicing
- DMD49 - Sustainable Design and Construction Statements
- DMD50 - Environmental Assessments Method
- DMD51 - Energy Efficiency Standards
- DMD52 - Decentralised Energy Networks
- DMD53 - Low and Zero Carbon Technology
- DMD58 - Water Efficiency
- DMD64 - Pollution Control and Assessment
- DMD68 - Noise
- DMD79 - Ecological Enhancements
- DMD80 - Trees on Development Sites
- DMD81 - Landscaping

28. Relevant London Plan 2021 policies include:

- D1 - London's Form, Character and Capacity for Growth
- D2 - Infrastructure Requirements for Sustainability Densities
- D3 - Optimising Site Capacity through the Design-Led Approach
- D4 - Delivering Good Design
- D5 - Inclusive Design
- D6 - Housing Quality and Standards
- D7 - Accessible Housing
- D8 - Public Realm
- D11 - Safety, Security and Resilience to Emergency
- D12 - Fire Safety
- D14 - Noise
- S11 - Improving Air Quality
- S12 - Minimising Greenhouse Gas Emissions
- S13 - Energy Infrastructure
- S18 - Waste Capacity and Net Waste Self-Sufficiency
- S113 - 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

- T7 - Deliveries, Servicing and Construction

29. Material considerations in relation to planning decisions include: the National Planning Policy Framework (NPPF); National Planning Practice Guidance (NPPG); London Housing Supplementary Planning Guidance (SPG); and Nationally Described Space Standards (March 2015).

Main Considerations

30. The following are considered to be the main considerations relevant to determining this application: (1) Principle of Development; (2) Urban Design; (3) Residential Amenity for Future Occupiers; (4) Residential Amenity of Neighbours; (5) Parking and Refuse; and (6) Sustainable Design and Construction.
31. Material considerations include: (1) Provision of Housing; (2) Planning History; (3) Local Precedents.

(1) Principle of Development

Residential Use

32. The property is currently vacant but was previously used as a garage space for x4 vehicles at ground floor and a 2 bedroom residential flat at first floor. The proposal is simply seeking to demolish the existing built form and intensify this established residential use at the Site to form 2 separate dwellings with allocated off-street parking spaces.
33. The surrounding site context complements the proposal given it is also predominantly residential in character.
34. The proposal is in line with London Plan Policy H2 and paragraph 69 of the NPPF which promote the benefits of smaller sites in meeting housing requirements, given they can be built out relatively quickly, diversifying the housing mix and supporting smaller local builders and developers.
35. The proposal seeks to make efficient use of an existing previously developed site and optimise the site capacity in line with London Plan Policy D3 and paragraph 119 of the NPPF. Paragraph 120 (d) of the NPPF also supports the provision of upward extensions where it will accord with neighbouring properties and the established streetscene and maintain suitable access for occupiers.
36. This proposal can accommodate additional housing stock which will contribute to the housing provisions of the Borough. The application site is located within an existing urban area wherein there is no objection in-principle to new residential development.

37. In principle, the increase of housing density on plots that can accommodate more than one dwelling is acceptable and in accordance with London Plan policy GG2 (Making the best use of land), H1 and DMD policy 5.
38. The London Plan Small Site Design Code states that, *"Residential garages should be prioritised for residential redevelopment. Development of these sites can reinstate the streetscape, reduce flood risk and encourage active travel"*.
39. Therefore, this scheme meets the thrust of the London Plan Small Site Design Code.
40. Equally, and in line with EDMD Policy DMD6 and its associated criteria, the proposal accords with the existing development pattern given the proposal is on the existing footprint of existing residential development and lower in height than the nearby 3 storey blocks of flatted development within Hertford Court. The London Plan density matrix has been superseded by Policy D3. As the proposal would only result in the creation of one additional dwelling, no policies relating to housing mix are triggered.

Sustainable Location

41. The Site is within walking distance of key services, facilities and transport modes. The PTAL of the site is 2 representing low levels of public accessibility. Table 10.3 - Maximum residential parking standards of the London Plan - states that areas within Outer London with a PTAL score of 2 – 3 with 1 – 2 beds, require up to 0.75 spaces per dwelling. This proposal provides x1 space per dwelling and includes an Electric Vehicle Charging point. There are a variety of viable alternatives to the private car in terms of access to key services and facilities - by walking, cycling or public transport. Within 800m of the Site - classed as a 'walkable neighbourhood' in terms of the Manual for Streets Guidance (2007), there are:

- Bus stops at St Monica's Church, Hedge Lane and Bourne Hill with a variety of services (329,629, N29, 616 W6, 616)
- Pharmacy (Walker's Chemist) within 260m
- Doctor's Surgery (Green Lanes Clinic and Gillian House Surgery)
- Primary School (Hazelwood Infant and Junior School)
- Secondary School (Palmer's Green High School)
- Leisure Facility (Bounds Green Recreation Club)

42. Within under 100m of the Site are:

- Convenience stores (Murat Supermarket)
- Variety of restaurants and small businesses
- Places of worship (St Monica's Catholic Church)
- Preschool (Leading Strings)
- Theatre (Intimate Theatre)

- Scout Hut

43. Equally, the local transport network can easily accommodate the additional residents that would result from this proposal. The local facilities, likewise, would not be overburdened by the additional residents. The proposal is therefore in accordance with EDMD Policy DMD6.
44. The principle of the proposal is therefore established given it is situated on an existing residential site within a predominantly residential area. It will also make efficient use of an established previously developed site in a sustainable location which accords with the existing development pattern and provides a new dwelling within a local authority with a current severe under delivery of housing.

(2) Urban Design

45. Enfield CS Policy CP30 'Maintaining and Improving the Quality of the Built and Open Environment' seeks to ensure that new developments are high quality and design-led, having regard to their context.
46. Enfield DMD Policy DMD37 'Achieving High Quality Design-Led Development' states that development that is not suitable for its intended function, that is inappropriate to its context, or which fails to have appropriate regard to its surroundings, will be refused. However, it also recognises there is a degree of subjectivity in this assessment of acceptable design.
47. This application is accompanied by street elevation drawings (refs: A1649-21/22/23/24) which clearly show the proposed development in context with the surrounding area.
48. A Design Statement by Urban & Rural also accompanies this application, to highlight the key project aspirations.

Surrounding Character and Appearance

49. Hertford Court is characterised by three storey buildings and single storey garages to the rear. The flatted development is spaced evenly throughout the development in 4 buildings, 19 Hertford Court being the smallest. The buildings are arranged along Bourne Hill and Green Lanes. They are all brick built with wide windows, some of the flats have balconies. There are 2 rows of garages to the rear of the site, backing onto Stonard Road.
50. The site has landscaped garden areas to the front of the buildings, allowing them to be set back from the main roads. An access road runs around the site, but is blocked

off on Bourne Hill by bollards and therefore the only vehicular access to the site is from Green Lanes.

51. The roofs of the buildings are pitched and the 3 large buildings have chimneys.
52. To the rear of the site is Stonard Road, which comprises mostly semi-detached and terraced dwellings, interspersed with some flatted development.
53. The current layout of the first floor flat above the garages is poor and does not provide ground floor access. Instead, the flat is accessed via an external staircase. The proposed design would provide larger accommodation and bring forward an additional dwelling.
54. The photograph below shows 19 Hertford Court as it is today.



Image 1: Northern elevation of 19 Hertford Court (Source: surveyor photograph, June 2023).



Image 2: Southern elevation of 19 Hertford Court (Source: surveyor photograph, June 2023)

55. Given the proposal site already comprises garages and a dwelling above, the residential proposal is consistent with the existing character. The proposal is seeking to increase the height to incorporate another storey. Three storey flatted development is already established in the rest of Hertford Court. Therefore the prevailing character of the site is maintained and the proposal would integrate well within the immediate vicinity and create streetscene improvements whilst concurrently responding to its immediate site constraints, in line with EDMD Policy DMD37.
56. The proposal's scale and massing have been driven by the existing buildings on site and the adjacent properties on the Hertford Court development and consideration for its central plot location.
57. The proposals have a lower roof ridge and eaves height than the existing surrounding properties, therefore retaining the subservience of built form at the Site, mirroring the existing situation.
58. Accordingly, the proposal respects the character and appearance of the existing flatted development at Hertford Court. It respects and accords with the established local character and is therefore considered acceptable within the streetscene, including when viewed from public vantage points. This is in line with ECS Policy CP30 and EDMD Policy DMD37.

Design

59. The proposal seeks to demolish the existing building on site and rebuild 2 dwellings. The built footprint will increase slightly, but remain oriented in the same manner with garage/carport access to the rear (north elevation). The accommodation is split across ground, first and second floors with an increase in height (of 2.618m) required to facilitate this and to accommodate sufficient head space in line with local and London Plan policies and as also set out in nationally described space standards. This is considered acceptable given the existing three storey built form of the other surrounding Hertford Court flatted blocks. As previously set out, the proposals would enable the proposals to be read as subservient to its neighbours, reflecting the existing situation, and appropriate to the Site's location.
60. The height comparison with the existing built form and nearby properties is clearly shown in the elevation drawings submitted in support of the application.
61. The proposal **complies with the required nationally described space standards being 95.1sqm in total, above the 79 sqm required for a 2 bed/4pers dwelling.** These nationally described space standards are reflected in London Plan D6.
62. The existing hedge around the south of the Site will be largely retained save for the introduction of pedestrian access openings which will be created to enable access to the dwellings, private amenity space and cycle and bin storage.
63. The proposal would maintain the pattern and rhythm of development within the row and would sit appropriately within its publicly perceived vantage point along Hertford Court. The proposal would offer sympathetic presence in terms of its size, scale, and massing, resulting in a positive contribution to the street frontage.
64. The design of the proposals offer a significant improvement over the existing, helping to raise the standard of design in the locality. In particular the landmark glazing feature at the southern elevation offers a striking focal point to the front of the properties.

Designing out Crime

65. This proposal has sought to utilise secured by design principles, including the removal of a dwelling with an external staircase access and replacing with x2 dwellings with ground floor access with good accessibility.
66. The 2 dwellings are semi-detached and therefore increase the level of natural surveillance, with front doors side-by-side. The dwellings will have new windows and doors that meet building regulation specifications, an improvement on the existing materials.
67. The properties will also benefit from secure cycle parking per dwelling.

68. The NPPF sets out that *“development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design, taking into account any local design guidance and supplementary planning document such as design guides and codes”*. Paragraph 134 continues that *“significant weight”* should also 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”*. The proposal would accord with these core planning principles.
69. In summary, the proposal, by virtue of its form, height, massing and detailed design would appear in keeping with the character and appearance of the streetscape and the surrounding area, as well as offering an improvement over the existing situation, in accordance with ECS Policy CP30; EDMD Policies DMD8, DMD37; London Plan Policies D3 and D4; and the NPPF as a whole.

(3) Residential Amenity of Future Occupiers

70. London Plan Policy D6 ‘Housing Quality and Standards’ sets out development should be of high-quality design and provide adequately sized rooms with comfortable and functional layouts which are fit for purpose and meet the needs of Londoners without differentiating between tenures.
71. ECS Policy CP4 ‘Housing Quality’ promotes providing adaptable, flexible, convenient accommodation appropriate to changing needs, enhancing choice, enabling independent living and helping to create more balanced and inclusive communities.

Internal Floorspace

72. The Technical Housing Standards stipulate minimum gross internal floor areas (GIAs) for dwellings/units based on the number of bedrooms, intended occupants and storeys, plus further dimension criteria for such spaces. Built-in storage is required for all units with minimum sizes depending on the number of bedrooms and occupants.
73. The Technical Housing Standards stipulate that a 2 bed, 4 persons, 3 storey dwelling should have a min GIA of 79 sqm with 2.0sqm of storage provided, with minimum bedroom sizes of 11.5m² for double/twin occupancy.

74. The London Plan - Policy D6 - also states that *"a dwelling with two or more bed spaces must have at least one double (or twin) bedroom that is at least 2.75m wide. Every other additional double (or twin) bedroom must be at least 2.55m wide"*.
75. Each dwelling has a GIA of 95.1 sqm with 3 sqm of storage space, and therefore meets the National Space Standards and London Plan.
76. The bedrooms meet the above requirements. The main bedroom has a floorspace of 13.5sqm and the second bedroom has a floorspace of 18.2 sqm, both over the national standard. The minimum widths are 3.295m and 4.089m respectively as shown on plans A1649-11 and 12.

Amenity

77. Policy DMD 9 of the Enfield Development Management Document and London Plan requires new development to provide good quality amenity space that is not significantly overlooked by surrounding uses.
78. Policy D6 of the London Plan states that where there are no higher local standards in the borough, that a minimum of 5 sq.m. of private outdoor space should be provided for 1-2 person dwellings and an extra 1 sq.m. should be provided for each additional occupant, and it must achieve a minimum depth and width of 1.5m. As this will be a 4 person dwelling, 7sqm will be required under the London Plan.
79. Policy DMD 9 states the private amenity standards for a 2bed/4pers dwelling (without access to communal space) is 23sqm.
80. In the Material Considerations section of this statement, there is a precedent listed whereby lower outdoor private amenity levels have been accepted by Enfield Council for sites that are in close proximity to public open space and in sustainable locations.
81. Sufficient levels of private amenity space are provided for the x2 dwellings. Unit 1 has 37.8sqm of private amenity space and Unit 2 has 62.8sqm. This exceeds both the London Plan and requirements set out in EDMD Policy DMD9.
82. Policy DMD 7 is relevant as part of this proposal seeks to utilise a portion of existing garden land. As the orientation of the built form is the same and only includes a minor extension above the existing footprint, the impact is minimal. Moreover, the addition of an additional dwelling still allows for both dwellings to have adequate private amenity space and therefore accords with Policy DMD7.
83. All windows have been positioned to enable adequate daylight whilst not compromising on privacy for future occupiers or neighbours.

84. The general layout of the proposal provides functional and practical spaces that meet policy requirements. The proposal is compliant with Part M4(2) of the Building Regulations.
85. In summary, the proposal provides sufficient floor space and private amenity space. It has a good quality outlook with sufficient natural light and adequate measures in place to protect privacy. This results in quality accommodation for the future occupiers, in line with ECS Policies CP4 and CP30; EDMD Policies DMD6, DMD7, DMD8, DMD9, and DMD10; and London Plan Policies D3, D4, D5, and D6.

(4) Residential Amenity of Neighbours

86. EDMD Policy DMD37 'Achieving High Quality and Design-Led Development' requires developments to be appropriate to their context having regard to their surroundings. Policy DMD8 states that new developments should preserve amenity in terms of daylight, sunlight, outlook, privacy, overlooking, noise and disturbance.

Outlook

87. The massing and scale of the proposed dwellings would be increased over the existing with a 261.8cm increase in roof ridge height and an extension of footprint 2.9m from the existing facade/1.45m in front of existing stairs. The elevation drawings accompanying this submission show how the proposal would integrate with the existing neighbouring properties and show that the proposal is still lower than the surrounding blocks of flats within Hertford Court.
88. EDMD Policies DMD8 'General Standards for New Residential Development' and DMD9 'Amenity Space' seeks to ensure that development is high quality, sustainable, has regard for and enhances local character, can meet the existing and future needs of residents, and protects residential amenity for neighbouring residents. EDMD Policy DMD10 'Distancing' seeks to ensure that the development would not result in housing with inadequate daylight/sunlight or privacy for the proposed or surrounding development.
89. DMD 10 states there should be a minimum distance between windows and side boundaries of 11m and 22m between rear facing windows.
90. The site layout plans supporting this application show the relevant separation distances between the existing built form and surrounding buildings as well as the

proposed building and surrounding buildings. The table below shows the relevant separation distances.

Building No./address	Existing separation distance	Proposed separation distance
20-25 Hertford Court	15.1m	11.8m
26-37 Hertford Court	19.1m - 23m	17.9m-20.2m
1 -18 Hertford Court	23m	21.2m
Stonard Rd	26m	27.6m

91. The rear facing windows of the proposal face Stonard Road. There is a 27.6m distance between the (ground floor) rear of the proposal and the windows at first floor level of the rear of Stonard Road which is above the 22m requirement, therefore no daylight/sunlight report is required and all the required separation distances are achieved and thus the proposal meets with policy DMD10.

Privacy

92. The existing hedged boundary treatment to the south and east of the site will be retained, providing continued privacy between the private amenity of the site and ground floor windows of Nos 1-18, 20-25 and 26-37 Hertford Court and therefore limits any overlooking.

93. At ground floor, the rear (north elevation) of the site comprises the carport access and x2 small, high level windows to the WC and part of the lounge area, with the main opening doors/windows to the front/south of the site.

94. This means there will be no loss of privacy from habitable rooms, demonstrating there will not be adverse impacts for the existing and any future occupiers of either property due to the separation distances and retention of existing hedge boundaries.

95. The terrace on the first floor is partially screened by an obscured wall with planting. Accordingly, overlooking into habitable rooms or gardens of neighbouring properties is limited, nor is there loss of daylight into habitable rooms of neighbouring properties as a result of the proposals.

Overshadowing

96. Due to the distance between the proposal and the nearest neighbours, and the proposals' height, there will be no overshadowing of rooms or gardens.

Overbearing

97. The proposal is only 216.8cm higher than the existing, resulting in a proposal that does not have an overbearing impact on habitable rooms of neighbouring properties nor their associated gardens given their separation distances.
98. In summary, the proposal would provide sufficient levels of private amenity space, defensible space, good quality outlook, sufficient natural light, and privacy, that it would result in a proposal that would not be harmful to the residential amenity of neighbouring properties, in accordance with CS Policies CP4 and CP30; EDMD Policies DMD6, DMD7, DMD8, DMD9, and DMD10; and London Plan Policies D3, D4, D5, and D6.

(5) Access, Parking and Refuse

Highways Safety Impact Assessment

99. A minor residential development needs to consider the Highway Safety impact of a proposal. In this case, x1 2 bedroom flat and x4 substandard garages are being demolished and replaced by x2 new semi-detached 2 bedroom dwellings with x2 parking spaces that do meet current space requirements.
100. Existing access to the garages is from the rear (north elevation). This will remain the same with access to the carports as existing. The stairs that lead up to the existing 2 bedroomed flat are on the South Elevation and the pedestrian access will remain on the South elevation.
101. Activity into and out of the site is not anticipated to change significantly given the site is already a residential/parking use.
102. Waste, recycling and cycle storage are discussed in detail below.

Pedestrian Access

103. Unobstructed pedestrian access to the proposal is provided via Hertford Court , off Green Lanes. There is a 1200mm wide path up to the access door and a clear opening width of 850mm. This is sufficient to meet with the recommendations by inclusive mobility.

Car Parking

104. Policy DMD 8 requires new residential development to provide adequate parking while DMD 45 seeks to minimise car parking and to promote sustainable transport options with sufficient capacity to accommodate increased demand as a consequence of the development. Recent Officer reports state that *The Council recognises that a*

flexible and balanced approach needs to be adopted to prevent excessive car parking provision while at the same time recognising that low on-site provision sometimes increases pressure on existing streets'.

105. Policy DMD 45 states: Car parking proposals will be considered against the standards set out in the London Plan and:
 - a. The scale and nature of the development
 - b. The public transport accessibility (PTAL) of the site;
 - c. Existing parking pressures in the locality;
 - d. Accessibility to local amenities, and the needs of the future occupants of the developments.
106. Chapter 10 of the London Plan further reinforces the importance of encouraging sustainable modes of transport in development with Policy T6 specifying maximum car parking standards.
107. The Site has a PTAL 2 rating and is located in a location with a low-moderate accessibility to services and facilities by non-car modes. In accordance with the parking standards set out in the London Plan, the development should provide a maximum of one car parking space per proposed dwelling.

Parking Survey

108. A parking survey has been undertaken for the Site by Motion/Benchmark Data Collection. It was conducted in May 2022 and demonstrates that there is a medium-high parking demand in the area. This report was conducted at the outset of the project to understand the parking needs of the area.
109. The report highlights that there is between an 85-89% parking stress in the area at the time of the survey. This measurement did not include nighttime parking on single yellow lines (with no restrictions), which, if included, would have brought down the figures further still.
110. The proposal is to remove x4 garage spaces that are currently vacant, under the ownership of the applicant and do not meet current space guidelines for garages. The spaces have approximate measurements of 2.77m x 5.46m, which is below the London Plan requirement for 7m x 3m. Therefore these spaces are not currently in use, not large enough for modern cars and therefore their loss will not result in the loss of off street parking space and consequently not impact parking demand in the surrounding roads.
111. Therefore this proposal will result in a net increase of x2 spaces given the existing x4 spaces are not usable.
112. The proposal includes x2 parking spaces that meet parking space requirements and have Electric Vehicle Charging Points.

113. This proposal therefore accords with Policy DMD45 and is in line with the precedents found in the Material Considerations section.

Cycle Parking

114. Policy T5 of the London Plan requires 2 spaces for units of 2 bedrooms or more. Cycle and bin stores should be separate and self contained.

115. Cycle parking must be secure, fully enclosed and convenient. The design of the store must ensure that it is big enough to accommodate the cycle with stands/racks allowing both the frame and at least one wheel to be secured. The cycle storage must be lockable (ideally by an access fob or a mortice lock), fully enclosed and sheltered from the weather and lit. It should benefit from good natural surveillance, be easy to use, and must not damage the cycle.

116. The proposal allows for two secure and covered cycle spaces per dwelling. The plans provided include detailed designs of the cycle store and show the proposed rack/stands within the store. This provision accords with London Plan policy requirements. See plan ref: A1649-10 for an example of the cycle storage proposed.

Refuse

117. EDMD Policy DMD47 specifies that new development will only be permitted where adequate, safe and functional provision is made for refuse storage. New dwellings should provide for waste storage to meet the LBE's refuse standards (ENV 08/162) for residential use.

118. Plan ref: A1649-10 shows provision of a 140 litre general waste bin, a 140 litre recycling bin and a food waste bin, per unit.

119. The proposal is compliant with these standards with adequate bin storage located within the enclosed boundary in the private amenity space. This enables easy access for the future occupant whilst concurrently ensuring minimum drag distance for refuse collection operatives.

(6) Sustainable Design and Construction

120. EDMD Policy DMD49 requires that new development achieve the highest sustainable design and construction standards having regard to technical feasibility and economic viability and include measures capable of mitigating and adapting to climate change to meet future needs. Policy DMD 51 requires all developments to

demonstrate how the proposal minimises energy-related CO₂ emissions in accordance with the set criteria. London Plan (2021) Policies - SI1(Air Quality) SI 2 (Minimising GreenHouse emissions), SI3 (Energy Infrastructure), SI 4 (Managing Heat Risk) SI5 (Water Infrastructure), SI7 (Reducing Waste) , SI13 (Sustainable Drainage) support these Local Plan policies.

121. 100% of the water supplied to the new dwellings will be supplied through a water metre and will incorporate water saving and efficiency measures that comply with Regulation 36(2)(b) of Part G 2 of the Building Regulations to ensure that a maximum of 105 litres of water is consumed per person per day. A fittings based approach will be utilised to determine the water consumption of the proposal.
122. With regards to Part M4(2) of the Building Regulations, the property has level access and is adaptable to allow for disabled access. This is in line with London Plan Policy D7.
123. The proposal seeks to reduce carbon dioxide emissions in compliance with London Pan SI 1 and DMD 51.
124. It is intended to achieve this by reusing materials, and selecting materials with lower embodied carbon over the project lifecycle. This will enable a carbon efficiency plan to be implemented with associated carbon reductions, in line with EDMD Policy DMD51.
125. The proposal will also benefit from;
 - Compact building forms and thick walls to accommodate U values
 - Efficient appliances including air-source heat pumps - shown on plan A1649-11.
 - PV Panels on roof
 - Rainwater harvesting
 - Energy efficient glazing
 - Permeable paving
 - Green Infrastructure
 - Locally sourced materials
 - Waste materials will be recycled where possible
 - The amount of glazed area will not be excessive to limit heat loss.

- The windows will be of a size that allow for adequate light & heat in the rooms, whilst minimising heat loss.
 - Energy efficient light bulbs will be used
 - Appliances will meet good fitting standards
126. The scheme will seek to provide up to 30% reduction of energy demands through the use of passive systems, ensuring compliance with Policy DMD 51.
127. The application form submitted with this application requests confirmation of the total capacity of the proposed heat pumps and solar energy panels, the NO_x total of annual emissions, and Particulate Matter Total Annual Emissions. Although the form states '0.00', these figures will be provided and approved through the discharge of planning conditions with an Energy Statement, which the applicant would have no objection to being secured by an appropriate condition, should the scheme be granted.
128. The risk of surface water flooding at the Site is very low - see Appendix A. The Site is not within 8m of a river, watercourse or culvert.
129. In terms of managing surface water, 3.6sqm of permeable paving will be located to the front, south elevation, in accordance with Policy DMD61. This will replace an existing area of impermeable hardstanding.
130. The provision of these SuDS ensures the maximisation of the use of SuDS in accordance with the London Plan Drainage Hierarchy and the principles of a SuDS Management Train. Permeable paving is a source control SuDS measure.
131. This application will follow the SuDS hierarchy, use permeable paving and rainwater harvesting and grey water harvesting, and seeks further SuDS measures to be secured by condition.
132. The proposal will utilise the existing servicing connections for foul drainage and connections to the existing sewer network.
133. In summary, the proposals accord with the relevant development plan policy in relation to sustainability, and in particular to EDMD Policies DMD49, DMD 51, and DMD61; and the London Plan.

Material Considerations

134. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the development plan unless material considerations indicate otherwise.
135. Material considerations specific to this application include: (1) Provision of Housing; (2) Planning History; and (3) Local Precedents.

(1) Provision of Housing

136. According to their latest (February 2023) Authority Monitoring Report (AMR) Enfield can not demonstrate a five year supply of housing land. It can only currently demonstrate a **2.0 years** housing land supply (see Appeal ref: APP/Q5300/W/22/3309367 dated 03/05/2023).
137. Therefore paragraph 11(d) of the Framework is engaged, this enacts the “tilted balance” whereby permissions should be granted for sustainable development, unless there are significant and demonstrable reasons otherwise.
138. In light of the above, the provision of any additional dwellings should carry weight in the planning balance, whilst noting the provision in dwelling net gain, given the size of the site, will only make a minor difference in addressing this deficit.
139. A recent Committee Report (23 May 2023) states that;

“In 2020 Enfield delivered 56% of the 2,328 homes target and was as a result placed into the “presumption in favour of sustainable development” category. In January 2021 Enfield delivered 67% of its homes target. The Council therefore remains in the “presumption in favour of sustainable development”.

140. The London Plan outlines through Policies H1 and H2 that there is a pressing need for more homes in London and that a genuine choice of new homes should be supported which are of the highest quality and of varying sizes and tenures in accordance with Local Development Frameworks. Policy H2, in particular, supports housing on small sites (under 0.25ha) and states that *Boroughs should proactively support well-designed new homes on small sites.*
141. Table 4.2 of the London Plan provides 10 year targets (2019/20 -2028/29) for net housing completions on small sites (below 0.25 hectares in size). For Enfield this is 3,530.
142. Footnote 8 of the NPPF establishes that the policies which are most important for determining the application are out-of-date. Consequently, permission should be granted unless any adverse impacts would significantly and demonstrably outweigh the benefits when assessed against the policies in the NPPF taken as a whole. The Site is not within a protected area.

143. The provision of one additional dwelling in the context of the LBE's lack of housing supply and delivery, is a **significant benefit**. Recent appeals have attributed 'moderate weight' to the delivery of x2 dwellings e.g. APP/Q5300/W/22/3300548.

(2) Planning History

144. According to the Enfield Planning Register - there have been no recent applications on this site since the register started in 2000.

(3) Local Precedents

145. Several applications for conversions and new builds to create additional dwellings have been undertaken in the site's surrounding area and those most relevant have been set out below.
146. **18/00132/FUL** was refused and then allowed at appeal in 2019 (Ref:APP/Q5300/W/18/3207108) for the *"Redevelopment of site involving demolition of existing garages and erection of a part 2, part 3 part 4 storey block of 9 self contained flats (5 x 1 bed, 3 x 2 bed and 1 x 3 bed) with associated amenity space, parking and landscaping"* at Garages, Bowes Road, London, N13 4NP.
147. This site is similar in that it is a garage site of backland development and proposed an intensification of dwellings on site. The dwellings did not all have access to dedicated private amenity space, but did have balconies, with access to communal amenity space and this was deemed acceptable. The same conclusion can be applied to this application.
148. **Appeal Decision APP/Q5300/W/21/3282455** - The development proposed is described as *"sub-division of the site and erection of 2no x 2-storey, 2 bed detached dwelling houses"* (21/01601/FUL). This was dismissed at appeal on 5 May 2022.
149. This application is relevant as it considered issues such as separation distances, impact on character of the area, internal space standards, parking, flood risk and sustainable construction.
150. Although this appeal was dismissed, it was mainly due to separation distances and lack of daylight /sunlight report (Policy DMD10). As the proposals subject to this application can demonstrate over 22m of separation distance from the rear elevations with Stonard Road, the proposals comply with DMD10.
151. The appeal proposal offered x1 parking space and a space for cycle parking, per dwelling and this was in a 1A PTAL score - this was deemed acceptable.

152. Conditions were offered for SuDs, landscaping & sustainable construction. The applicant would be happy to accept similar conditions, if this application is approved.
153. **22/03293/FUL** Creation of mansard roof extension to facilitate two self-contained flats with rear terrace balcony, above residential premises, 35 - 41 Silver Street, Enfield, EN1 3EF.
154. The application was approved and did not supply any private amenity space. In the Officer Report it was stated, *"The proposed self-contained flat and studio no dwellings would have propose no private amenity space which is contrary to Policy DMD9. However, given the nature of the site, town centre location and proximity to Enfield Town Park the LPA considers the proposal acceptable in this regard despite no private amenity space provided"*.
155. This demonstrates that the LPA have not always applied policy strictly with regards to provision of private amenity space.
156. **22/02629/FUL**, Erection of a 4-storey block of 3 self-contained flats, with roof terrace and associated parking, cycle and bin storage, Trevera Court, 135 Alma Road, Enfield, EN3 4UP.
157. This application was approved in 2022 and was for an additional 3 flats. The flats proposed included balconies and a shared roof terrace and were deemed to comply with the amenity standards and parking standards (providing x1 parking space in a PTAL Zone of 2). SuDs, and Water Efficiency were conditioned.
158. Whilst acknowledging that every case should be judged on its own merits, Applicants should also expect consistency in decision making with this principle being held up by the Courts.

S106, Mayors and Enfield CIL Contributions

159. As of the April 2010, new legislation in the form of CIL Regulations 2010 (as amended) came into force which would allow 'charging authorities' in England and Wales to apportion a levy on net additional floorspace for certain types of qualifying development to enable the funding of a wide range of infrastructure that is needed as a result of development.

160. Since April 2012 the Mayor of London has been charging CIL in Enfield at the rate of £20 per sum.

161. The site is located within the Borough Higher Rate CIL Charging Zone (£120/sqm). Given the development would result in the creation of x1 additional dwelling, the proposal would be CIL liable.

Conclusion

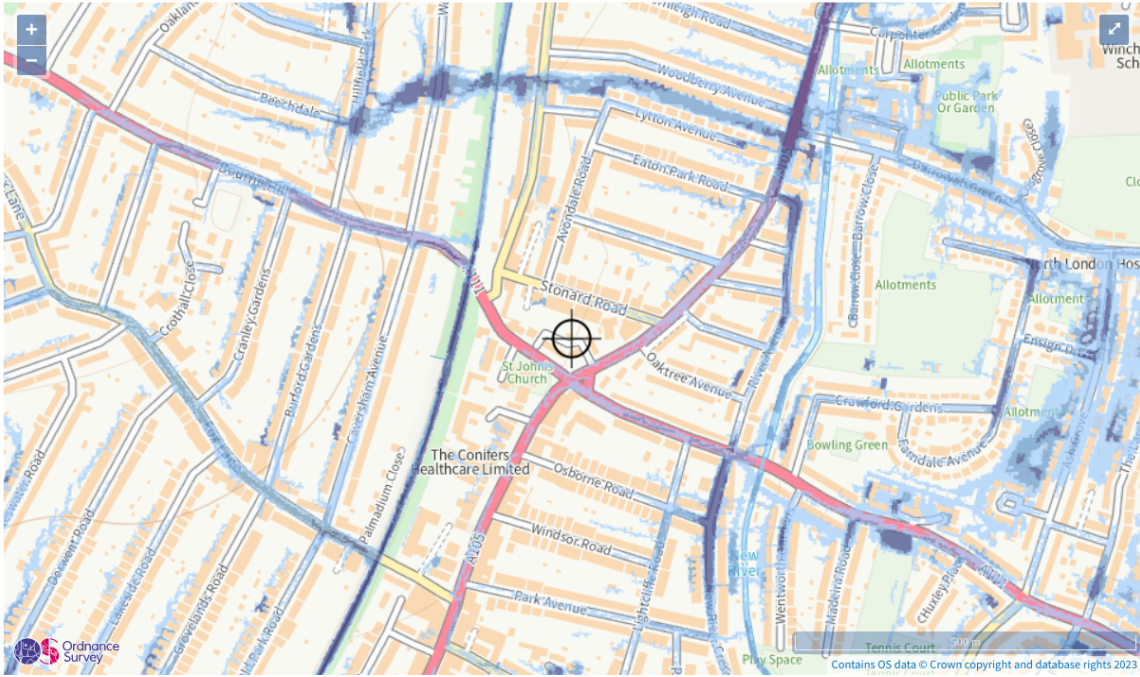
162. The LBE has a significant shortfall in housing provision. As per paragraph 11(d) of the NPPF, the relevant development plan policies relating to housing provision should therefore be considered out-of-date and planning permission should be granted unless there any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole. The 'tilted balance' of the NPPF is engaged.

163. Section 38(6) of the Planning and Compulsory Purchase Act 2004 and Section 70(2) of the Town and Country Planning Act 1990 require that planning applications be determined in accordance with the development plan, unless material considerations indicate otherwise.

164. As outlined in this Statement, the proposal accords with all relevant development plan policies. In addition, there are several strong material considerations in favour of the proposals. As such, the Applicant requests that the LBE approves this application without delay.

Appendix A

Extract from: Long Term Flood Risk Check



Extent of flooding from surface water

● High ● Medium ● Low ○ Very Low ⊕ Location you selected