



# Planning Statement



Foxglade Properties Limited  
Belmont Close Garages, EN4 9LT  
September 2023

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## 1.0 Introduction

### Background

1.1 This planning statement has been prepared by MJP Planning on behalf of Foxglade Properties Limited (the applicant). The applicant is proposing the development at Belmont Close in Cockfosters (the site). The proposal is to provide six residential units, whilst retaining the operational garages on site.

1.2 Full planning permission is sought for the following (the proposal):

*“Retention of the existing garages and creation of six new residential units with car parking, cycle storage, refuse storage and associated landscaping”*

1.3 The principle of this development is fully supported by Enfield adopted planning policies along with the adopted London Plan. London Plan policy H2 supports the development of small sites and sets Boroughs a target for delivering a proportion of its annual housing target on small sites (defined as being less than 0.25 hectares). The proposal is fully compliant with the aims of local and strategic policy that guides residential development within the Borough and the proposal will provide six high-quality contemporary new dwellings.

1.4 The application is supported by a suite of supporting documents, which should be read in conjunction with this planning statement. The full submission comprises the following:

- Bat Emergence Survey by Green Shoots;
- Daylight and Sunlight report by Rapleys;
- Design and Access Statement (DAS) by Downen Farmer Architects;
- Energy and sustainability statement by The PES;
- Flood Risk Assessment and Sustainable Drainage Strategy by The PES;
- Landscape Strategy by Jim Kelly Design;
- Noise Assessment by ALN Acoustic Design;
- Planning Statement by MJP Planning;
- Structural Commentary by Evolve; and
- Transport Statement by RPS.

## 2.0 Site and area description

- 2.1 The site comprises a perimeter block of 28 private garages within a private residential estate in Cockfosters, whose main entrance is located on Mount Pleasant. The garages are accessed from two vehicular entrances at either end of the block, off Belmont Close and there is a dense row of unkempt shrubbery which borders the western edge.
- 2.2 The site is located adjacent to Cockfosters Town Centre to the east and abuts the rear boundary of a number of commercial premises. To the south and west is predominantly residential in character and to the north beyond the Town Centre is a Nature Reserve designated as Green Belt and Countryside on the adopted proposals map.
- 2.3 The site has a PTAL of 3/4, making it a sustainable location for housing growth. Cockfosters Station is just 280m from the site (4-minute walk), and buses along Cockfosters Road travel to Edgware, Arnos Grove, Muswell Hill, and Potters Bar.

**Figure 1: Site location**



- 2.5 The site is therefore recognised as being a suitable location for intensification within the London Plan (Policy H1) being less than 800m from a station and designated centre. The site is not within a conservation area and not adjacent to listed buildings, however Cockfosters Station is Grade II listed. The site is within Flood Risk Zone 1, affording a low probability of flooding.
- 2.6 The submitted DAS and Transport Statement include further assessment of the site's context.

### 3.0 Pre-Application Engagement

- 3.1 This planning application has been informed by pre-application feedback from Officers at the London Borough of Enfield. Advice was sought through a formal pre-application advice request, made in April 2023, with a meeting held in May 2023. Following the initial meeting and response, a further pre-app was submitted in July 2023 with a meeting held in September 2023. A further written response provided following the updated information.

**Figure 2: Pre-application 1 submission**



**Figure 3: Pre-application 2 submission**



- 3.2 This planning submission has been informed by the written response issued by Enfield Planning Officers and those discussions. The feedback is summarised below. The section is intended to be a high-level summary of the proposal and should be read in conjunction with the detailed assessment set out within the submitted DAS at Section 3.
- 3.3 The proposed development has evolved to address the comments. It is considered the pre-application process overall was collaborative and results in a development of high design quality. A summary of the key points from the pre-app process have been set out in the DAS. The following is a summary of the advice provided at pre-application 1 stage.
- The general principle of breaking down the overall massing was supported;
  - The mansard roofs whilst taking inspiration from the local context are not necessary (the pre-application 2 feedback backtracked on this advice with the design reverting to a mansard approach for the formal submission);
  - The unit mix would be required to be improved with an increase in larger units;
  - Sustainability should be at the core of the design process;
  - Mitigate the effects of climate change, especially during summer overheating;
  - Provide adequate provisions for natural, cross ventilation;
  - Habitable rooms on the mews level would benefit from a buffer zone to increase privacy and to allow for secure natural ventilation;
  - An amended layout with promotes natural surveillance would be supported;
  - The increase of mews level amenity would benefit families;
  - Inclusion of angled / oriel windows would be supported to allow users to benefit from privacy whilst promoting natural surveillance and allowing users to leave windows open;
  - The external stair up to the mews level has potential to be unpleasant and dangerous in the wet, freezing or in the dark;
  - Potential overlooking from windows and balconies needs further consideration and mitigation;
  - Cycle parking would benefit from space for cargo cycles and charging stations; and
  - The parking layout is well-designed however an accessible space would be required.
- 3.4 Following the pre-application 1 advice, a series of design changes were made and a number of technical reports were procured including a parking survey, landscaping scheme, drainage strategy, and structural engineers advice. Layout changes were made to respond to the initial feedback. A summary of the pre-application 2 feedback was as follows:
- The revised housing mix is now considered adequately in favour of ‘family sized’ housing;
  - Inclusion of a EV charging point should be factored into the proposal;
  - Ensure all units meet minimum built-in storage;
  - Internal layout of unit 4 should be reconsidered to make the best use of space for the single bedroom;
  - Proximity of operable in unit 4 living area should be reconsidered due to proximity of refuse store and any potential odours that come from this;
  - Oriel and angled windows across the mews at first floor level should be incorporated as well as off-setting facing habitable room windows, so that they don’t face directly onto one another to reduce potential for direct overlooking;
  - Railings on mews terraces should be avoided where possible;
  - The roof amenity should not only rely on planting;
  - Cycle store could be improved by incorporating into the ground floor storage/parking area and made accessible from the main lobby;
  - The revised option for a flat roof and vertical wall/full second storey is a preferred approach, however the mass needs to be broken down further; and
  - Add brick detailing and faux window detailing to external wall of ground garages.
- 3.5 The final scheme has sought to address these comments and ensure full support from officers at pre-application stage.

## 4.0 Proposed Development

4.1 The proposed description of development is:

*“Retention of the existing garages and creation of six new residential units with car parking, cycle storage, refuse storage and associated landscaping”*

4.2 A schedule of the proposed residential accommodation is provided below with the submitted DAS providing a more detailed explanation of the proposal:

Unit	Type	GIA (sqm)	Amenity (sqm)
Unit 1	2B3P	75	34
Unit 2	3B5P	96	35
Unit 3	3B5P	103	43
Unit 4	4B7P	147	50
Unit 5	3B5P	109	20
Unit 6	2B4P	95	37
Total		625	219

### Layout

4.3 The proposal is for six units across the first floor of the existing garages. The existing pitched roof of the garages will be removed to accommodate the new homes on a first-floor podium level. Four car parking spaces are proposed in addition to a cycle store and refuse store, and the site will be comprehensively landscaped.

### Scale and massing

4.4 The proposed massing is a stepped approach of two storeys with partial third storeys as part of a mansard roof design. The surrounding built form is predominantly made up of two and three storey buildings and the proposed massing fits in comfortably with this urban character. The proposed stepped and angled massing is considered appropriately subservient to surrounding properties and the materials proposed reflect the local context whilst bringing a contemporary feel to the development.

### Tenure

4.5 The proposed houses will be for sale on the private market.

### External appearance

4.6 The buildings will be finished in a high-quality brick with brown roof tiles. The brick mortar will closely match the colour of the brick tones. The irregular shape and varied roof form gives the development visual interest and helps to break down the mass – further helped by the use of a contrasting materials, as well as an asymmetrical fenestration pattern.

### Amenity space

4.7 The scheme will have high quality amenity space, designed to provide a range of amenity typologies. The development is carefully crafted to create a community around a central courtyard with opportunities for soft landscape interventions and both communal and private amenity space. The DAS and landscape strategy sets out how the amenity space relates to the development overall.

### **Landscaping**

- 4.8 The landscaping strategy is designed to improve and promote biodiversity on the site, creating usable amenity for residents. The DAS sets out how the landscape is conceived to deliberately contrast the angular forms of the terraces.

### **Access and parking**

- 4.9 The scheme will have 4 car parking spaces based on the PTAL rating of 3 / 4 which equates to 0.5-0.75 car parking spaces per unit. The scheme will also have a secure covered cycle store with space for two bicycles per unit. The private and visitor bicycle storage is in accordance with the Enfield Planning Policy.

### **Accessibility**

- 4.10 All units are compliant with Part M4(2) standards for accessibility.

### **Refuse and servicing**

- 4.11 Each unit will have access to the secure communal bin store. On refuse collection day residents will wheel their bins out to the front of the communal footpath for collection to take place.



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## 5.0 Planning considerations

5.1 The adopted development plan comprises:

- The London Plan 2021;
- The Enfield Development Management Document, 2014;
- The Enfield Core Strategy, 2010.

5.2 Other material considerations (such as national planning policy and supplementary planning documents, area action plans and design briefs) include:

- National Planning Policy Framework 2023 (NPPF);
- National Design Guide 2019;
- Planning Practice Guidance ;
- GLA Housing SPG 2016; and
- Enfield ‘Waste and Recycling Storage’ Planning Guidance (2019).

5.3 Section 38(6) of the Planning Compulsory Purchase Act 2004 requires that proposals be determined in accordance with the development plan unless material considerations indicate otherwise. This section therefore assesses the proposal against the policies within the development plan outlined above and examines relevant material considerations where appropriate. The assessment draws upon the suite of application documents listed at Section 1 of this statement. The main planning considerations are:

- Principle of development;
- Housing mix and tenure;
- Design and Massing;
- Quality of accommodation;
- Neighbouring residential amenity; and
- Transport and parking.

5.2 Further technical matters that are addressed in supporting reports include:

- Drainage;
- Energy and sustainability;
- Noise; and
- Landscaping.

5.4 The relevant Planning issues are considered below.

### **Principle of development**

5.5 At the heart of the NPPF there is a presumption in favour of sustainable development. As set out in paragraph 8, there are three components of sustainable development that the planning system seeks to achieve. These are its economic role, its social role, and its environmental role. The planning system should support the growth of 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. It should also foster 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. Paragraph 60 of the NPPF also seeks to boost significantly the supply of housing, and paragraph 119 encourages the effective use of land by re-using land that has been previously developed.

5.6 Paragraph 120 of the NPPF further states that planning decision should promote and support the development of under-utilised land and buildings – especially if this would help to meet identified needs for housing where land supply is constrained, and available sites could be used more effectively.

Local authorities should also take a proactive role in identifying and helping to bring forward land that may be suitable for meeting development needs. Paragraph 124 states that planning policies and decisions should support development that makes efficient use of land, considering the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it. Notably, 'where there is an existing or anticipated shortfall 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.

- 5.7 Paragraph 69 is also clear that small and medium sized sites can make an important contribution to meeting the housing requirement for an area, recognising that they be built out relatively quickly.
- 5.8 London Plan policy GG2 states that in order to create successful sustainable mixed-use places that make the best use of land, those involved in planning and development must enable the development of brownfield land, prioritise sites which are well-connected by public transport, and explore the potential to intensify the use of land and promoting higher density development, and apply a design-led approach to determine the optimum capacity of sites.
- 5.9 One of the key aims in the London Plan is to create a housing market that works better for all Londoners. The 2017 London Strategic Housing Market Assessment has identified a significant overall need for housing. London needs 66,000 new homes each year, for at least twenty years in order to satisfy demand. The London Plan sets a strategic target for Enfield to deliver at least 1,246 homes per year between 2019/20 and 2028/29.
- 5.10 The delivery of residential accommodation on this site will make a small but valuable contribution to the Borough's strategic small sites housing target of 353 homes a year. London Plan policy H1 sets out that in order to achieve the 10 year housing targets, Boroughs should optimise the potential for housing delivery on all suitable and available brownfield sites through development plans and planning decisions. Sources of capacity include sites with existing or planned PTAL 3-6 or which are located within 800m distance of a station or town centre boundary, or on small sites under 0.25ha. The proposed development is also directly in line with London Plan policy H2, which specifically states that optimising housing on small sites such as this (below 0.25 hectares) should be pro-actively supported to 'significantly increase the contribution of small sites to meet London's housing needs.' This presumption in favour of development is further bolstered by London Plan policy D3's support for the efficient use of land, in proposals such as this which optimise site potential. There will be no net loss of residential floorspace as a result of the development as it delivers a net gain through the provision of six new homes. In addition, the proposal will also complement the existing residential development in the area, in its material palette, height, and scale, see the DAS for further detail on the design.
- 5.11 Given the brownfield and accessible nature of the site, the principle of residential accommodation should be welcomed in planning terms. The site is small and underutilised, and so the proposed development is therefore also considered to be in line with Draft Enfield Policy DMH4, which echoes the London Plan and supports intensification of small sites that have good access to public transport, are within 800m of a town centre, and have good local infrastructure. Draft Policy DMH4 goes on to state that development on small sites requires innovative design solutions to optimise housing density and land use, especially in fine-grained areas (for example, through the use of courtyard and mews housing typologies, rooftop and terraced amenity spaces, shared spaces and facilities, provision of basement/undercroft parking and redevelopment of vacant/underused spaces, such as single-storey garages, external service yards and incidental amenity space).
- 5.12 Looking wider at a national level, the Government published in January 2021 their National Housing Delivery Test 2021 Measurements, which set out the calculated total net homes required for each Borough over the Housing Delivery Test period (2018/19, 2019/20 and 2020/21). The total number of homes Enfield has delivered in this three year period is 1,777 out of a total calculated requirement of 2,650. This represents a 67% delivery on what is required by the Government. Delivery of below 75% is subject to the NPPF's 'presumption in favour of sustainable development', (our emphasis) or the 'tilted balance'. This means that planning permission should be granted unless adverse impacts 'significantly and demonstrably' outweigh the benefits. The housing delivery Policy 2 must be regarded

as out of date and the principle of development therefore assessed against the requirements of the NPPF Paragraph 11(d) which states that:

*Where there are no relevant development plan policies, or the policies are out of date which are most important for determining the application are out-of-date, granting permission unless:*

- i) The applications 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 doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies of this Framework as a whole.*

- 5.13 In response to the Council's housing delivery performance, and in accordance with NPPF para 11(d), an Action Plan has been prepared, which sets out how the Council will drive its housing delivery performance in order to meet its housing delivery requirements. This includes measures such as focusing on small sites/SMEs; being a commercially minded planning service; promoting innovation and ensuring faster decision making. These key Council objectives are fundamental considerations when assessing the appropriateness of this development.
- 5.14 Taking into consideration the above strategic need for homes in the Borough, the strategic and local support for development on sustainably located small sites such as this, as well as the critically low levels of housing delivery within the Borough, being so low that the presumption in favour of sustainable development has been applied, (our emphasis) the planning benefits of the delivery of six new high quality homes far outweigh any planning harm that may arise. It is considered that the provision of residential development on site is in full accordance with the relevant national and local planning policies and should be supported. Overall, the redevelopment of this site is considered to be supported at a strategic and local level as it delivers a net gain in residential floorspace and is therefore acceptable, delivering benefits for the Borough and relieving pressure on greenfield sites.

#### **Housing mix and tenure**

- 5.15 London Plan policy H10 states that schemes should generally consist of a range of unit sizes and that to determine the appropriate mix of unit sizes.
- 5.16 The development provides a good mix of units, including family accommodation, proposing accommodation of predominantly two bed homes. Local Policy DMD 3 and Draft Policy DMH3, places high priority on three bed homes and medium priority on two-bed homes, which this scheme delivers.

#### **Design**

- 5.17 The Government has attached great importance to the design of the built environment in the NPPF with a presumption in favour of sustainable development. Paragraph 124 of the NPPF states that good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities and that the planning system should foster 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. In October 2019 the Government also published the National Design Guide, helping to address the question of how well-designed places are recognised, by outlining and illustrating the Government's priorities for well-designed places. In July 2021 the National Model Design Code was published which provides detailed guidance on the production of design codes, guides, and policies to promote successful design.
- 5.18 The NPPF paragraph 130 states that planning policies and decisions should ensure that developments:
- a) are visually attractive as a result of good architecture, layout, and appropriate and effective landscaping.
  - b) 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).
  - c) 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;

- d) 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.
- 5.19 London Plan policy D3 states that all development must make the best use of land by following a design-led approach that optimises the capacity of sites. This means ensuring development is of the most appropriate form and land use for the site. Higher density developments are promoted in locations that are well-connected to jobs, services, infrastructure, and amenities by public transport, walking and cycling. Development must, among other criteria, enhance local context by delivering buildings and spaces that positively respond to local distinctiveness through their layout, orientation, scale, appearance and shape, with due regard to existing and emerging street hierarchy, building types, forms and proportions. Development must also achieve safe, secure, and inclusive environments, and be of high quality, with architecture that pays attention to detail, and gives thorough consideration to the practicality of use, flexibility, safety and building lifespan. Policy D6 requires housing development to be of high-quality design and provide adequately sized rooms.
- 5.20 Local plan policy CP30 of the Core Strategy seeks to maximise the quality of the built environment through the adoption of borough-wide standards and guidance relating to design quality. Policy DMD37 of the DMD requires high quality, design-led developments which are appropriate to their context and demonstrate appropriate regard to their surroundings. Policy DM37 continues, 'development should capitalise on the opportunities available for improving an area' and should consider a number of urban design principles.
- 5.21 Draft policy H4 states that new residential development on small sites must be carefully and creatively designed to avoid harm to amenity of surrounding properties and uses, especially in terms of outlook, privacy, daylight and sunlight. Innovative design solutions should be used to optimise housing density and land use, especially in fine-grained areas (for example, through the use of courtyard and mews housing typologies, rooftop and terraced amenity spaces, shared spaces and facilities, provision of basement/undercroft parking and redevelopment of vacant/underused spaces, such as single-storey garages, external service yards and incidental amenity space). The DAS showcases how the design of the development articulates this policy perspective.
- 5.22 The design of the proposed development has evolved considerably since its inception and been through detailed testing, in collaboration with Officers and the consultant team and two pre-application rounds, to ensure the highest quality throughout has been achieved. The external materials are sympathetic and appropriate to the local context, blending with the prevailing colour palettes. The form and fenestration has also been developed to create visual interest from the street and from within the site.
- 5.23 The scale and massing of the proposed units are appropriate to the surrounding building heights and would not appear out of character or overly dominant in the street scene. The proposed development therefore does not cause harm to the amenity of the surrounding residential buildings. The submitted Design and Access Statement includes more detailed visual analysis of the proposed scale and massing in the context of surrounding urban form.
- 5.24 The proposed development is in line with draft Enfield policy H4, which echoes London Plan policy H2, supporting the delivery of well-designed homes on small sites. Draft policy H4 states that development on small sites requires innovative design solutions to optimise housing density and land use, especially in fine-grained areas. The design of the proposal has been carefully considered to take account of the evolving typologies of the wider surrounding suburban context, whilst optimising the site's potential for much needed housing through a design-led approach (in line with London Plan policy D3), The proposed development has also had regard to the London Plan policy D5 which supports proposals that are inclusively designed, policy D6 which sets out guidance on housing quality and standards, and policy D7 which relates to accessibility standards. Local policy DMD 6 requires the scale and form of development to be appropriate to the existing pattern of development or setting, having regard to the character typologies.
- 5.25 The proposals have been designed to provide high quality planting and landscaping scheme that enhances the appearance of the site and further encourages biodiversity, whilst providing natural

screening between each house. The delivery of biodiversity improvements is considered to deliver benefits weighing in favour of the scheme.

- 5.26 Overall, the proposed design is of a high quality that enhances the appearance of the site and positively responds to the local context in terms of its scale, massing, and material palette, considered appropriate for this suburban site. This development improves the appearance of the site and delivers high quality housing sensitive to the surrounding residential properties. The proposed design is therefore considered acceptable in accordance with relevant strategic and local policies.

#### **Quality of accommodation**

- 5.27 The layout works with the existing features and constraints of the site to create high quality accommodation that maximises daylight (as demonstrated by the high compliance rate against the BRE targets set out in the daylight and sunlight assessment) and outlook whilst mitigating overlooking opportunities within and outside the site. In accordance with Local Policy DMD 8 and DMD 9, all units exceed national space standards, all have generous private amenity space exceeding London Plan standards and amenity space standards set out in policy DMD 9, all are at least dual aspect, and all comply with Part M4(2) standards.
- 5.28 The windows are generously sized to maximise light within each unit without creating unacceptable overlooking opportunities. The internal open plan layouts are considered an appropriate configuration for the character of the site, with the large living spaces, kitchens, dining rooms, and utility rooms located on the ground floors and the bedrooms above.
- 5.29 The submitted DAS provides further analysis on the accommodation but overall the quality is considered acceptable and the benefits of delivering six new homes, with a very high quality internal accommodation and large outdoor space on this site are considered significant and of material benefit to the Borough.

#### **Residential amenity**

- 5.30 The siting and layout of the development and the design has had consideration to local policy DMD 8 and draft policy DE13 which require development to preserve amenity in terms of daylight, sunlight, outlook, privacy, overlooking, noise and disturbance.
- 5.31 The houses have been positioned to follow the line of the site frontage and are suitably spaced apart from one another to create breathing room between each building. The main aspects of each house do not directly face each other and the principal outlook of all six homes is front to rear. The number of windows on the flank elevations have been kept to a minimum and staggered along the elevations so that there is no direct overlooking between the habitable rooms. Oriel windows have been used where there are direct relationships across the mews to mitigate overlooking. Screening is provided to terraces where necessary to ensure privacy within amenity spaces.
- 5.32 The daylight and sunlight report assessed the impact of the development on the surrounding properties. The results of the assessment show that the development has very little impact on neighbouring properties. The daylight distribution results show that out of all rooms tested, all met the BRE target with only one window of 136 tested not complying although this window does meet the VSC test. The proposed development also has very little impact on neighbouring properties with regards to ASPH as all windows situated within 90 degrees of due south meet the BRE guidance. Overall, the report concludes that the proposal accords with the planning guidance and is acceptable.
- 5.33 The opportunity for overlooking is considered to be minimal across the development and any impacts to neighbouring amenity have been successfully mitigated. It is therefore considered that the proposed six houses do not adversely affect neighbouring residential amenity, comply with policy DMD 8, and overall are acceptable.

## Transport and parking

- 5.34 The Transport Statement submitted with this suite of planning application documentation considers the traffic generation for the site on the local highway network. In assessing the predicted traffic generation for the site, information has been collected from similar sites on the TRICS database. The trip generation assessment presented in the Transport Statement shows that the proposed development will have minimal traffic impact to the site's surrounding highway network.
- 5.35 The proposed development will provide four on site car parking spaces (including an accessible car parking space) located to the front of the site, and cycle parking spaces in secure and covered stores in line with London Plan policy T6.1. This is consistent with London Plan residential car parking standards for sites with a PTAL rating of 3/4 in Outer London, which outline between 0.5 to 0.75 spaces per dwelling. This provision also means that visitors will be able to park on the site and not put any stress on the local parking network, which is not subject to a controlled parking zone.
- 5.36 Servicing of the site will take place on street, as per the existing arrangement and as per the rest of the street, which is considered acceptable. Overall, the proposed development is considered to have minimal traffic impact on the operation of the local transport or highway networks or highway safety, in accordance with the requirements of the NPPF.

## Technical assessments

- 5.37 The application is also supported by a series of technical assessments. These should be reviewed by the relevant consultees. A summary of the conclusions on a number of these matters is as follows:
- **Drainage:** To address local policy DMD 60 and NPPF policy, a FRA and SuDS report has been submitted. The proposed SuDS design strategy provides for the source control techniques of permeable paving as Formpave / Aquaflo attenuation/infiltration system or similar, green roofs and rain gardens and rainwater harvesting butt system for water reuse. Surface water will be discharged into the existing Thames Water surface water sewer network adjacent to the proposed development. The SuDS provides a surface water management solution that reduces the surface water run off that leaves the site and shows that the proposed development does not result in an increase to the risk of flooding on or off site. Green roofs, rain garden and communal landscaping areas with Rainwater Harvesting water butts are provided on site for both source control for low rainfall events and will take the first 5mm of rainfall as well as opportunities for an element of bioretention, treatment, biodiversity and amenity value. They can also provide an opportunity for evapotranspiration in some locations.
  - **Energy and sustainability:** To address local policy DMD 50 and draft policy SE4 a sustainability statement has been submitted which takes on board the latest GLA guidance on writing energy statements (June 2022) as well as taking into account matters raised within the London Plan 2021. Guidance now seeks a minimum on-site improvement over Part L 2021 at 35%, with a benchmark improvement over Part L 2021 at 50%. A 'Lean, Clean, Green' approach has been adopted and the development achieves an improvement in build fabric at over 14% (min target 10%) at the "Be Lean" stage and an overall improvement (DER/TER) in regulated emissions at over 84% (min target 60%) above Part L 2021 standard, through the adoption of very high standards of insulation, heat pump driven heating and hot water systems and a roof mounted PV array and therefore complies with local and strategic policy.
  - **Landscaping:** In line with London plan policy G5 a landscaping strategy is included. The scheme sympathetically addresses the site context, whilst softening the visual impact of the built form through the mix of hard and soft landscape materials that compliment in colour and tone. The development proposals aim to create a community around a central courtyard with opportunities for soft landscape interventions and communal and private amenity space. The urban greening factor as per London Plan guidance has been factored into the design process, with the provision of ecologically rich green roofs and

opportunities for foraging and pollinating, alongside habitat boxes to encourage wildlife to inhabit the site. The intention is to create a landscaping scheme that is resilient to climate changes and promotes biodiversity and ecological richness. Creating sustainable landscapes which are climate resilient is a key part of the landscape goals. Landscape treatments will create an interconnected SuDS system. Urban greening is a key design driver. The development maximises green space and tree planting and also accommodates access and social spaces.

- **Noise:** To address policy set out in the NPPF, Local Plan and the Noise Policy Statement for England, a Noise Assessment has been undertaken. The main source of environmental noise at the site is plant equipment at the rear of commercial premises on Cockfosters Parade. A noise survey has been carried out to establish noise levels at the site. In the proposed internal arrangement, bedrooms and living rooms are to face away from the commercial units which will help to minimise their exposure to noise. Calculations have been carried out to derive a suitable sound insulation performance specification for the façade elements in order to achieve internal noise levels in accordance with BS8233:2014 guidelines. The noise implications of the proposed ventilation strategy have been considered. The Noise Assessment concluded that the use of standard thermal double-glazing and a natural ventilation strategy would be consistent with achieving suitable internal noise levels for resting and sleeping. Noise levels within the external amenity areas are expected to be within BS8233:2014 guidelines. The Noise Assessment concluded that the proposed development will provide suitable acoustic conditions for its occupants and will not have a significant noise impact on existing residential receptors
  
- **Ecology:** A Preliminary Ecological Assessment (PEA) was carried out during July 2023. The purpose was to check for any ecological issues which might affect proposed development works on site. The PEA survey found a low probability of bats roosting within the garage block based only on the external features of the building, e.g., missing and broken roof and ridge tiles along the northern and eastern elevations. For low potential, usually one emergence survey visit would be required. However, the internal areas of the garages could not be accessed during the survey visit. It is possible that the internal areas may contain features or evidence that increases the potential of the building to contain a bat roost. Therefore, to compensate for lack of access internally, roost potential was instead assessed as low-moderate and as low-moderate potential was estimated then two survey visits were recommended instead of one. Further emergence/re-entry surveying was recommended to involve four surveyors on two survey visits, at either dusk or dawn. These survey visits were carried out in August and September 2023. During the surveys, there was a very low level of bat activity. No further surveys are required provided works are undertaken within year of the surveys having been carried out.

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## 6.0 Conclusions

- 6.1 The proposal has been assessed against all of the relevant adopted and emerging planning policies and guidance. The principle of the delivering much needed housing on an underutilised small site is also considered to be supported in adopted planning policy.

### **Benefits of the proposal**

- 6.2 The key benefits the proposal delivers are:
- The provision of six high quality new homes in an area suited to low density housing;
  - A small but valuable contribution to the Borough's housing supply and delivery where the presumption in favour of sustainable development applies;
  - The optimisation and efficient use of an underutilised site that releases pressure on more sensitive sites within and outside of the Borough;
  - The delivery of high-quality design that respects the surrounding context;
  - The enhancement of the visual appearance of the site through high quality contextual design and a comprehensive and high-quality landscaping scheme;
  - An enhancement of the sustainability of the site through the provision of the a comprehensive landscaping strategy that enhances biodiversity, ecological richness and climate resilience goals.
- 6.3 The proposal complies with Section 38(6) of the Planning Compulsory Purchase Act 2004 which states the determination must be made in accordance with the development plan unless material considerations indicate otherwise. The Planning Statement has demonstrated that the proposal is in accordance with the development plan. In the event conflicts were judged to arise, in light of Enfield's housing delivery position, planning permission should be granted unless 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.