



Planning and Heritage Assessment

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# Land Rear Of 687 Green Lanes London N21 3RX

March 2024

Ref. HM22-1017

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# 1. Introduction

1.1 This Planning and Heritage Statement has been prepared by Simply Planning Limited (SPL), on behalf of our client, Paragon Glass Services Ltd, and is submitted in support of a full planning application in respect of the land to the rear of the Former Police Station, 687 Green Lanes, London.

## Description of Development.

1.2 The application seeks to regularise the use of part of the site for the purposes of external storage (Class B8), and seeks permission for the change of use of associated outbuilding to provide ancillary office accommodation.

1.3 For the avoidance of doubt, the proposals do not include any structural works nor external alterations to the building beyond permitted repairs; furthermore, the application does not seek permission for any operational development/building works of any kind.

1.4 The description of development is, therefore as follows:

*“Change of Use the Site for the Purpose of External Storage (Class B8) with Ancillary Office Accommodation (Part Retrospective).”*

1.5 Paragon Glass Services Ltd are extremely experienced in the glazing sector and are one of the leading suppliers and installers of double glazing windows and doors in the South East of England. Paragon are a local business, and are the parent company to Price-Rite windows, who operate from 318 Lincoln Road, Enfield.

1.6 The Lincoln Road site is used for manufacturing, storage and retail purposes, however, given the success of the company, is currently operating at capacity. This has necessitated the need to store window frames and profiles offsite in an ‘overspill’ format. The application site has provided this space on an informal basis.

1.7 The application proposals, therefore seek to formalise/regularise the use of the site for temporary storage purposes. The continued use of the site will enable a local business to adapt to market demand and will enable the utilisation of a formerly vacant, disused brownfield site. As we go onto demonstrate, the proposed use of the site is wholly appropriate in this location, it would not cause harm to the amenity of neighbouring residents and given its containment to the rear of the site, would not have a material visual bearing on the character of the immediate locality.

## Planning Background

1.8 This proposal is a resubmission of planning and associated listed building application ref’s. 23/01967/FUL and 23/01968/LBC. That application sought consent for: *“Change of use of outbuilding at rear (sui generis) to an office (Class E), alongside temporary ancillary external storage (Part Retrospective)”*

## Supporting Documents

1.9 The application is accompanied by a series of technical documents which consider the acceptability of the proposals in light of the Development Plan policies and other material considerations. The accompanying documents are listed as follows:

Document	Author
Transport Technical Note	AVAL Consulting Group
Noise Impact Assessment	KP Acoustics

1.10 The submission also comprises the completed Planning Application Form and Certificate B; and a full suite of planning drawings.

### **Structure of the Statement**

1.11 The remainder of this statement is structured as follows:

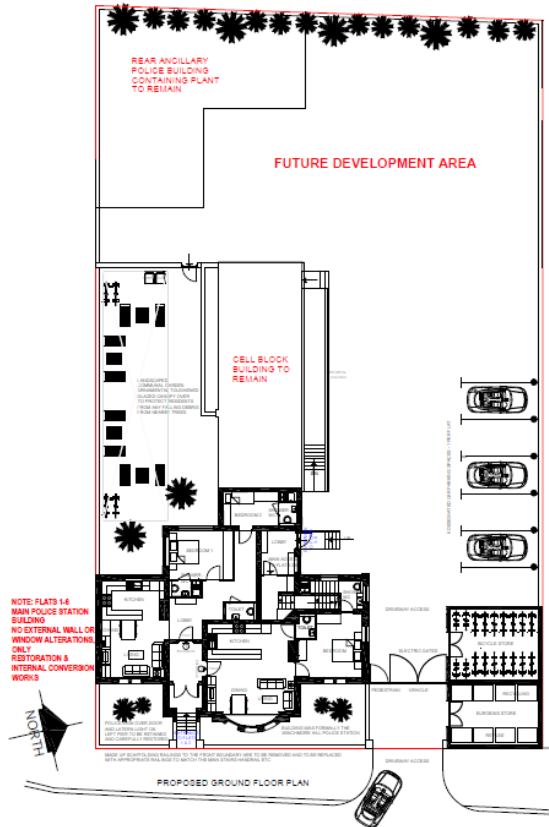
- **Section 2** provides a description of the application site and surrounding area.
- **Section 3** discusses the planning background and proposed development.
- **Section 4** outlines the relevant policy context
- **Section 5** considers the matters at issue and assesses the scheme against the Development Plan Policies.
- **Section 6** draws our conclusions

## 2. Site and Surroundings

- 2.1 The application site comprises an area of disused brownfield land, situated to the rear (west) of the former police station building, at 687 Green Lanes, Winchmore Hill, London.
- 2.2 The site forms part of an established residential, industrial and commercial environment. It sits to the east of no's. 8 – 11 (inclusive) Coombe Cor; to the south of a builders merchants (previously occupied by Travis Perkins); to the north of a Sainsbury's supermarket; and to the west of the former police station building which has recently been converted to provide 6 no. residential apartments. The application site is physically separated from the converted police station by the former cell block which has been retained on site.
- 2.3 The site, in its context, is shown in the aerial image below:



- 2.4 Whilst discussed in greater detail below, the conversion of the police station was granted consent under application ref. 17/03314/FUL. The description of development was as follows:  
*“Refurbishment and conversion of former police station into 6 self-contained flats (2 x 1-bed, 2 x 2-bed and 2 x 3-bed) with internal alterations, associated landscaping and parking, together with demolition of front police storage building and erection of a new single storey block to provide cycle and bin storage.”*
- 2.5 Notwithstanding this, whilst included within the redline for application 17/03314/FUL, the site was not subject to any proposed works, did not include any facilities associated with the residential permission and is, thus, somewhat ‘left over’ and redundant.
- 2.6 Indeed, the approved site plan simply suggests that the application site is a ‘potential development area’ (Figure 2 below) and, therefore, serves no particular purpose and is underutilised.



- 2.7 The site comprises an area of hard surfacing and an existing outbuilding which was previously used ancillary to the police station. Given the use of the site as a police station ceased in 1998 and following the conversion of the main building, the outbuilding has become redundant and surplus to requirements.
- 2.8 The application site is unallocated and is not subject to any specific landscape designations. The site sits approximately 75m to the south of Winchmore Hill Local Centre and falls within Flood Zone 1. It is, however, acknowledged that the former Police Station is Grade II Listed.

# 3. Planning History and Proposed Development

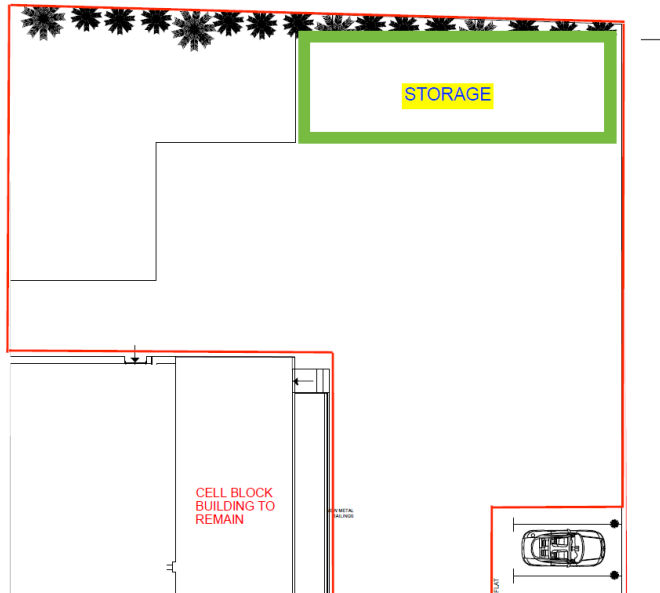
## Planning History

- 3.1 On 4th May 2022, Paragon Glass Services Ltd received correspondence from Enforcement Officer Mrs Josephine Falzone who raised concern regarding the unauthorised use of the site for storage (enforcement case ref. ENF/22/0151)
- 3.2 As part of that correspondence, Mrs Falzone indicated that the use of the site for commercial storage failed to accord with the approved plans which formed part of planning application 17/03314/FUL.
- 3.3 The site plan attached to that correspondence showed the site to be occupied by 4 no. residential units and a vehicle turning head. The attached plan did not, therefore, represent the consented site layout and, thus, caused some initial confusion regarding the relationship with the approved residential scheme.
- 3.4 At this stage discussions were held between SPL and Mrs Falzone to establish the consented position. We also advised Paragon Glass Windows Ltd that the use of the space for the purposes of external storage required planning permission in any case, and thus highlighted that a full planning application to regularise the use of the site would be required.
- 3.5 A full planning for the 'Change of use of redundant outbuilding (sui generis) to an office (class E), with ancillary external storage (Part Retrospective)' was submitted to London Borough of Enfield in November 2022 (ref's. 22/03762/FUL & 22/03763/LBC). The application was made invalid and subsequently returned in February 2023.
- 3.6 A follow up application (23/01967/FUL) was submitted in June 2023 for *Change of use of outbuilding at rear (sui generis) to an office (Class E), alongside temporary ancillary external storage (Part Retrospective)*.
- 3.7 The application was refused under delegated authority on 25<sup>th</sup> August 2023 for 3no. reasons:
  1. *The use of part of the site as storage area, due to the potentially frequent customer and delivery vehicle trips and by virtue of the general noise, activity and visual impact created by the proposed use would adversely affect the residential amenities of adjoining and nearby occupiers, contrary to policies CP30 and CP32 of the Core Strategy (2010), DMD68 of the Development Management Document (2014), D4 and D14 of the London Plan (2021), as well as the objectives of the National Planning Policy Framework.*
  2. *The storage use, by virtue of its nature and function and associated materials would detract from the character and appearance of the Grade II listed building and its setting. The proposals are therefore contrary to policies DMD37 and DMD44 of the Development Management Document (2014), CP30 and CP31 of the Core Strategy (2010) and Policies D4 and HC1 of the London Plan (2021) as well as the advice and guidance contained within the National Planning Policy Framework and the Planning (Listed Buildings and Conservation Areas) Act 1990*
  3. *The proposed change of use due to lack of adequate servicing arrangements, tracking details, car parking and cycle parking layout and site layout details commensurate with the more intensive use proposed, fails to provide sufficient information to demonstrate that the use would not give rise to conditions prejudicial to the free flow and safety of vehicular traffic and pedestrians. The proposed development would therefore be contrary to Policies T5 and T6 of the London Plan (2021), Policies CP24 and CP25 of the Core Strategy (2010), Policies DMD45, and DMD47 of the Enfield Development Management Document (2014).*
- 3.8 The Listed Build Consent was subsequently refused on 25th August replicating refusal reason No.2 from the Planning Application.

## Proposed Development

- 3.9 This application seeks to address the reasons for refusal. Together with further clarification/detail regarding the proposed use, the application is supported by specialist technical information which directly addresses the reasons for refusal. In short, we would comment as follows:
- The ancillary office is to be occupied by a maximum of two employees, who will arrive to site via public transport.
  - There will be no visitor/customer access to the site whatsoever.
  - The storage area will be accessed once per day only by a 7.5t panel van. As the site access is gated this can be fully controlled.
  - The proposals will not, therefore, result in frequent vehicle trips. To the contrary, vehicle trips will be minimal.
  - A Transport Technical Note, is submitted in support of the application, this confirms that the proposals are not considered to have an adverse impact on the local road network.
  - The quantum of storage and location will be strictly controlled to a small area to the rear of the site. For the avoidance of doubt all other unlawful storage materials will be removed from site. This can be controlled by way of condition.
  - The application is supported by a Noise Impact Assessment which demonstrates that confirms that the noise from vehicle operations during day-time hours would be expected to have low impact on nearby residents. The delivery frequency (i.e. 1 trip) and time can be controlled by condition, restricted any deliveries in unsociable/evening hours.
- 3.10 Paragon Glass have considered development options and intend to substantially clear the site to reduce the quantum of storage in line with the enforcement officer's request. Nevertheless, permission is sought to use the site for business purposes and to retain a small section of the yard for ancillary storage. This forms the basis of the submission.
- 3.11 The proposals include the change the use of the existing outbuilding to create office accommodation (Class E). Whilst the office will have a sales function, it will be used primarily for the management of orders and wider administrative tasks. No internal structural works nor external building operations are proposed. All internal works will be cosmetic.
- 3.12 The building will be occupied by a maximum of 2no. members of staff.
- 3.13 For the avoidance of doubt, the proposals do not include any structural works nor external alterations to the building beyond permitted repairs; furthermore, the application does not seek permission for any operational development/building works of any kind
- 3.14 The proposed ancillary storage will be contained to the area etched in green on the submitted site plan (see Figure 3). The area will be used to store window frames and profiles. No other materials, and, importantly, no glass, will be stored on site.





- 3.15 All manufacturing and primary storage will remain at the Lincoln Road site.
- 3.16 There are no HGV movements to and from the site, window frames and profiles will be transited by a 7.5 tonne panel van. As detailed within the transport statement, this will be limited to a single daily trip to and from the site.
- 3.17 This can reasonably be controlled by way of condition.
- 3.18 Whilst there is ample space within the site for employee parking, employees currently access the site via sustainable travel modes, including public transport. This can be controlled through a dedicated travel plan.

## 4. Relevant Planning Policy

4.1 Section 38(6) of the Planning and Compulsory Purchase Act (2004) establishes that any application for development should be determined in accordance with the Development Plan, unless material considerations indicate otherwise.

4.2 The Development Plan for the application site comprises: The London Plan (2021); the Enfield Core Strategy (2010) and the Enfield Development Management Document (2014).

4.3 The key policies for the determination of the application are listed as follows:

### London Plan (2021)

- GG2 – Making the best use of land
- GG5 – Growing a good economy
- E2 – Providing suitable business space
- HC1 – Heritage Conservation and growth

### Enfield Core Strategy

- CP 13 – Promoting Economic Prosperity
- CP 30 – Maintaining and Improving the Quality of the Built and Open Environment
- CP31 – Built and Landscape Heritage

### Development Management Document

- DMD 23 – New Employment Development
- DMD 24 – Small Businesses
- DMD 38 – The Design of Business Premises
- DMD 44 – Conserving and Enhancing Heritage Assets
- DMD 45 – Parking Standards and Layouts

4.4 Other material considerations include the National Planning Policy Framework (NPPF), National Planning Practice guidance (NPPG) and the draft Enfield Local Plan (Regulation 18).

## 5. Matters at Issue

### Principle of Development

- 5.1 Paragraph 85 of the NPPF indicates that planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. It continues by emphasising the need to support economic growth and productivity, taking into account local business needs
- 5.2 The NPPF also supports the sustainable reuse of under-utilised land and buildings and attaches significant weight on the re-use of brownfield sites. The importance of making the best use of land and enabling the development of brownfield sites is echoed by London Plan policy GG2.
- 5.3 At the regional level, Policy E2 'Providing suitable business space' of the London plan supports the provision of a range of B Class business space in terms of type, use and site to meet the needs of micro, small and medium-sized enterprises and to support firms wishing to start-up or expand.
- 5.4 Locally, Core Policy 13 seeks to promote economic prosperity in Enfield, whilst DMD Policy 24 lends support to proposals for small businesses.
- 5.5 In this instance, the application proposals will provide storage space to support the growth and expansion of a recognised local business. It will make a meaningful use of a underutilised brownfield site and will bring a vacant and redundant, building back into use.
- 5.6 The use of the site for external storage is wholly compatible with the surrounding mixed commercial, industrial and residential character of the surrounding environment; indeed, a builders merchant abuts the site to the north. Nevertheless, as evidenced below, the use of the site for open storage purposes will not be intensive and thus, respects the amenity of nearby residents.
- 5.7 The use of the space for external storage (Class B8) with an ancillary office diversifies the B Class business space within the locality in respect of type and scale. The use of the yard meets the needs of a small – medium sized business and helps to support a firm wishing to expand, wholly in accordance with the requirements of London Plan Policy E2.
- 5.8 As we go on to demonstrate below, the use of the site would not cause harm to the amenity of neighbouring residents nor the character of the site and its surroundings. The proposals do not include any new operational works and vehicle movements are of a limited nature. The site is, therefore, wholly appropriate for the open storage of window frames and profiles.
- 5.9 Notably the storage area will also be significantly reduced from the existing operation on site.
- 5.10 Based on this information, the proposals comply with the requirements of London Plan Policy E2 and Local Plan Policies CP13 and DMD24. The proposals makes an efficient use of a sustainably located brownfield site, bring a vacant building and yard back into meaningful use and support the expansion, adaptation and growth of a local business. The proposals are, therefore, acceptable in principle.
- 5.11 At this juncture is also highly relevant that officer's have not previously raised any objection to the principle of development.

### Heritage Impact

### Policy Context

- 5.12 The Planning (Listed Buildings and Conservation areas) Act 1990 places a duty upon the local planning authority in determining applications for development affecting Conservation areas to pay special attention to the desirability of preserving or enhancing the character or appearance of the area.
- 5.13 The National Planning Policy Framework (NPPF) provides the Government’s national planning policy on the conservation of the historic environment. In respect of information requirements for applications, it sets out that:
- “In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance.” (Paragraph 200)*
- 5.14 Paragraph 203 of the NPPF states that in determining applications local planning authorities should take account of:
- (a) *“the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;*
- (b) *b. the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and*
- (c) *c. the desirability of new development making a positive contribution to local character and distinctiveness.”*
- 5.15 London Plan Policy HC1 confirms that development proposals affecting heritage assets and their settings, should conserve their significance, by being sympathetic to the assets’ significance and appreciation within their surroundings.
- 5.16 Locally, Core Strategy Policy 31 confirms that the Council will implement national and regional heritage policies to pro-actively preserve and enhance the borough’s heritage assets.

## Description of Assets

### *Main Building*

- 5.17 The site sits adjacent to the former Winchmore Police Station, which is a Grade II Listed Building. The building was built in 1915, was designated as a listed building in 1974 and ceased use as a police station in 1998. The list description for the site is as follows:

*“Police station of around 1915 by Dixon Butler (1860-1920). Red brick building of 3 storeys, 4 windows. The 2 centre bays project under paired, stone-coped curved gables. Brick quoins and stone dressings. Tiled roof with diagonal brick chimneys and stone-coped gable ends. 2- and 3-light sash windows. On ground floor 3-window rounded bow has stone cornice and blocking course level with those of entrance, which has shouldered architrave and swell frieze. 7 steps with wrought iron handrails and lamp holder.”*

- 5.18 There is no reference to the outbuilding in the list description.
- 5.19 The building has recently been renovated as part of the implementation of application 17/03314/FUL. It retains an attractive appearance and has some aesthetic and historical value.

### *Outbuilding*

- 5.20 The detached outbuilding was built between 1947 and 1958. Whilst unclear, it is possible, and indeed likely, that the building is not a curtilage listed structure. In any event, the building is not considered to be of any architectural or historic interest. It is a post war, flat roof, L-shaped structure finished in red brick with

irregular fenestration. Internally, the building comprises rectangular rooms which appear to have previously provided ancillary office accommodation to the police station. The building has become redundant and, over time, has become tired in appearance.

- 5.21 The building is not considered to be of any evidential value, historical value, aesthetic value nor communal value.

### **Impact Assessment**

- 5.22 The proposals will bring the existing outbuilding back into meaningful use and will help prevent its further decline. Whilst no structural works or building operations are proposed, any general repair/cosmetic works would improve the aesthetic appearance and function of a building and, in turn, enhances the setting of the adjacent former listed building
- 5.23 The use of the space for office purposes is consistent with the former function of the building.
- 5.24 There can be no objection to the cosmetic improvement of the outbuilding and the benefits derived from bringing it back into meaningful use are tangible and significant.
- 5.25 Whilst officers consider that the nature, function and materials associated with the storage use of the site would detract from the character and appearance of the Grade II listed building and its setting, we would contend that the part of the site used for open storage is minor in scale and poorly related to the listed building.
- 5.26 Indeed, the proposed ancillary storage area will be contained to the north western corner of the site, away from the listed building. The storage area would not be viewed in the context of the listed building from public areas. Given the wholly reversible nature storage, the proposed development is not considered to result in any significant, nor, indeed, lasting harm to the heritage asset.
- 5.27 The active use of the site will ensure that the yard does not deteriorate in appearance to the detriment of the buildings setting. Indeed, reactivating the site limits the potential for decline and thus conserves the long term setting of the building.
- 5.28 The formalisation of the use of the site, will also result in the clearance of unlawful external storage, to the betterment of the building's setting, containing the unlawful storage to small scale contained location.
- 5.29 Should any harm be identified, given the reversible nature of open storage this would reasonably be considered to sit at the low end of 'less than substantial harm' and would be significantly outweighed by the public benefits derived from the reactivating the site together with the economic benefits.
- 5.30 Based on this information, the proposals comply with the requirements of London Plan Policy HC1, Core Policy 31, policies DMD37 and DMD44 of the Development Management Document (2014), and the guidance contained within the NPPF and thus overcome the second reason for refusal.

### **Amenity Considerations**

- 5.31 The provision of a small scale office is also wholly appropriate to the area and consistent with the previous function of the existing outbuilding. Normal working hours will apply (8am - 5pm Monday to Friday, 9am - 1pm Saturday, Closed on Sunday) and delivery/collection times can be reasonably controlled by way of a suitably worded condition.
- 5.32 Storage will be contained to the north western corner of the site, away from habitable room windows. Given the minor scale and nature of the storage, vehicular trips to and from the site will be minimal. Any deliveries/collections will be made by van and no heavy good vehicles will access the site.

- 5.33 No industrial processes will take place on the site whatsoever.
- 5.34 As evidenced throughout this document the use of the site is not intensive and will not necessitate frequent customer and delivery trips.
- 5.35 It is also notable that a large builders merchants is located immediately to the north of the site and has consistently operated without causing detriment to the amenity of surrounding residential uses. In this instance, the use of the application site for office accommodation and open storage is significantly less intensive
- 5.36 Nevertheless, to address the first reasons for refusal, the application is supported by a Noise Impact Assessment, prepared by KP Acoustics, which confirms that the proposals will not cause harm to the noise environment of neighbouring residents.
- 5.37 For the reasons set out above (Character and Appearance), it is not considered that the development would cause harm to the visual amenity of neighbouring residents.
- 5.38 The reactivation of the site will also increase natural surveillance and thus, improve, safety and security to benefit of the residential occupiers.
- 5.39 On balance the use of the site is not considered to be intensive, nor noise generating. The proposals sit comfortably alongside the adjacent residential and commercial uses and do not cause harm to the amenity enjoyed by neighbouring residents.
- 5.40 The proposed development would not cause harm to the amenity of neighbouring residents by virtue of a noise and disturbance and, therefore, overcomes the first reason for refusal.

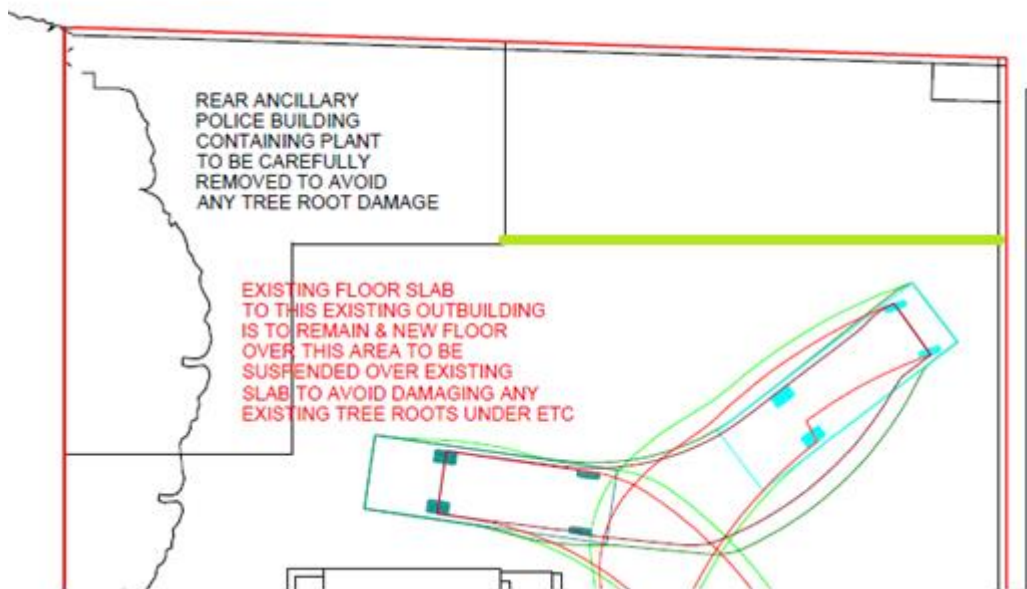
## **Transport Matters**

### **Trip generation**

- 5.41 The application sit supported by a transport technical note prepared by AVAL. This confirms that the storage area will be accessed once per day only, by a 7.5t panel and that this will be controlled by way of condition.
- 5.42 The access to the office and storage area is gated and will be controlled, therefore it will be known how many vehicles arrive and leave per day.
- 5.43 Similarly, the technical Note confirms that the office anticipates generating 1 vehicle trip during the AM peak and 1 vehicle trip in the PM peak. Throughout the day (7 a.m.–7 p.m.), it is projected that four vehicles will *could* arrive. Notwithstanding this, as all staff (2no.) arrive by public transport the trip generation is a worst case scenario. Sustainable travels modes will be encouraged and could be controlled through a Travel Plan.
- 5.44 As such, contrary to the previous reason for refusal, it can be unequivocally concluded that the site will not result in frequent customer and delivery vehicle trips. The use is not intensive and would not necessitate an increase in on site vehicle parking over and above the existing/consented arrangement.

### **Tracking and Safety**

- 5.45 The site benefits from a single point of access which benefits from good levels of visibility. Furthermore tracking drawings demonstrate that vehicles can comfortably turn within the site without conflict with the proposed storage area (denoted by the green line)



5.46 Overall, the Transport Technical Note draws the following conclusions:

- *The site benefits from an existing point of vehicular access which is shared by the residential development located to the front of the site and the remaining yard and outbuilding to the rear.*
- *The access has good visibility to the north and south along Green Lanes/A105.*
- *There is ample space within the site for employee and any potential customer/visitor parking, although this is not anticipated.*
- *Delivery vehicles and servicing vehicles can serve the site car park. The largest vehicle expected on site is a 7.5tonne panel van, which can turn on site. This will serve the storage facility.*
- *Vehicular trips will be minimal.*
- *Paragraph 115 of the NPPF states that: ‘Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe’. This cannot be said to be the case in this instance.*
- *Given the scale of the use, the proposed scheme is not considered to have an adverse impact on the local road network and, therefore, complies with the requirements of Policy DMD 24 which relates to new employment development and small businesses.*

5.47 The proposals, therefore, overcome the previous reasons for refusal on transport matters.

### **Other Material Considerations**

5.48 Consistent with the previous application, the proposals does not give rise to any other technical concerns.

## 6. Conclusions

6.1 Our conclusions are as follows:

- The proposals will utilise a sustainably located brownfield site and will support the growth, expansion and adaptation of a local business.
- The proposed office space will bring a vacant and underutilised building back into meaningful use.
- The ancillary storage will be contained to the rear corner of the site, away from the listed building. The open storage proposed is temporary in nature and wholly reversible. The proposals will not cause harm to the setting of the heritage asset.
- The use of the site will re-energise the building and preserve its future.
- The benefits derived from bringing the building back into meaningful use are tangible and significant.
- As evidenced through the submission of a Noise Impact Assessment, the proposals do not cause harm to the amenity of neighbouring residents.
- The use of the site is wholly compatible with surrounding commercial, industrial and residential land uses.
- As evidenced through the submission of a Transport Technical Note, the proposals do not give rise to any transport concerns.
- The site currently fails to perform a meaningful function.
- The client has worked with officers to reduce the extent of storage on site, the application will formalise the new position.

6.2 The proposals successfully overcome the previous reasons for refusal and represent sustainable development that accords with current policy and, as such, attract the full weight and support of policy.

6.3 We trust that on the basis of the information submitted, the application can be duly registered and we look forward to discussing the proposal with your officers in more detail in due course. If, however, you require any further information, please do not hesitate to contact me.





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