

# discover Enfield



**Enfield's Draft Development  
Management Document**

*'Planning a better Enfield with you'  
May 2012*



# Contents

■	Chapters	
1	<b>Introduction</b>	<b>6</b>
	<b>1.1 Enfield's Local Plan</b>	<b>6</b>
	<b>1.2 National and Regional Context</b>	<b>8</b>
	<b>1.3 Key challenges and supporting evidence</b>	<b>8</b>
	<b>1.4 Development Management Document</b>	<b>8</b>
	1.4.1 The Policies Map	9
	1.4.2 How to make representations on this document and next steps	9
	<b>1.5 How this document will be used</b>	<b>10</b>
	<b>1.6 Implementation</b>	<b>10</b>
2	<b>Sustainable Development</b>	<b>12</b>
	<b>2.1 Good Design</b>	<b>12</b>
	<b>2.2 Sustainable Design and Construction</b>	<b>14</b>
3	<b>Housing</b>	<b>20</b>
	<b>3.1 Affordable Housing</b>	<b>20</b>
	<b>3.2 Housing Size</b>	<b>22</b>
	<b>3.3 Protecting the Existing Housing Stock and Residential Conversions</b>	<b>25</b>
	<b>3.4 Standards for New Development</b>	<b>30</b>
	<b>3.5 Residential Extensions</b>	<b>42</b>
	<b>3.6 Specialist Housing Needs</b>	<b>45</b>
4	<b>Community Facilities</b>	<b>50</b>
	<b>4.1 Community Facilities</b>	<b>50</b>
	<b>4.2 Day Nurseries</b>	<b>52</b>
5	<b>Enfield's Economy</b>	<b>56</b>
	<b>5.1 Introduction</b>	<b>56</b>
	<b>5.2 Strategic Industrial Location (SIL)</b>	<b>56</b>
	<b>5.3 Locally Significant Industrial Sites (LSIS)</b>	<b>57</b>
	<b>5.4 Complementary and Supporting Uses within SIL and LSIS</b>	<b>58</b>
	<b>5.5 New Employment Development</b>	<b>59</b>
	<b>5.6 Preventing the Loss of Industrial and Employment Capacity</b>	<b>60</b>
	<b>5.7 Market Demand and Viability Assessments</b>	<b>61</b>
	<b>5.8 Small Businesses</b>	<b>64</b>
6	<b>Town Centres and Shopping</b>	<b>68</b>
	<b>6.1 New Retail and Leisure Development</b>	<b>68</b>
	<b>6.2 Enfield Town</b>	<b>70</b>
	<b>6.3 Angel Edmonton, Edmonton Green, Palmers Green and Southgate</b>	<b>71</b>
	<b>6.4 Local Centres and Local Parades</b>	<b>72</b>
	<b>6.5 Loss of Individual Shops and Small Clusters of Shops</b>	<b>73</b>
	<b>6.6 Vacant or Underused Floorspace above Shops in Town Centres</b>	<b>74</b>
	<b>6.7 Development Involving Tourism and Visitor Accommodation</b>	<b>75</b>
	<b>6.8 Managing the Impact of Food and Drink Establishments In and Outside of Designated Centres</b>	<b>76</b>
	<b>6.9 Evening Economy</b>	<b>78</b>
	<b>6.10 Banqueting Suites/ Function Halls</b>	<b>79</b>
	<b>6.11 Social Clubs</b>	<b>79</b>

# Contents

<b>7</b>	<b>Built Environment</b>	<b>82</b>
	7.1 Design considerations for Business Premises	82
	7.2 Design of Civic Buildings	85
	7.3 Tall buildings	87
	7.4 Heritage and built environment	90
<b>8</b>	<b>Transport and Parking</b>	<b>96</b>
	8.1 Parking Standards	96
	8.2 Vehicle Crossovers	98
	8.3 Access and Servicing Development	99
	8.4 Assessing the Transport Implications of New Development	101
<b>9</b>	<b>Tackling Climate Change</b>	<b>104</b>
	9.1 Our Low Carbon Future	104
	9.2 Responsible Sourcing of Materials, Waste Minimisation and Green Procurement	115
	9.3 Conserving water	117
	9.4 Flood Risk	119
<b>10</b>	<b>Environmental Protection</b>	<b>132</b>
	10.1 Air Quality	133
	10.2 Land Contamination	135
	10.3 Hazardous Substances	136
	10.4 Noise	137
	10.5 Light Pollution	139
	10.6 Water Quality	140
<b>11</b>	<b>Green Infrastructure</b>	<b>144</b>
	11.1 Open Space	144
	11.2 Play space for children and young people	147
	11.3 Playing Pitches	149
	11.4 Waterways	150
	11.5 Wildlife Corridors and Green Chains	151
	11.6 Biodiversity and Ecological Enhancements	152
	11.7 Trees and Landscaping	155
<b>12</b>	<b>Green Belt</b>	<b>160</b>
	12.1 Protecting the Green Belt	160
	12.2 Urban Fringe	162
	12.3 Areas of Special Character	163
	12.4 Agriculture	164
	12.5 Cemeteries and Memorial Gardens	168
	12.6 Developed Sites in the Green Belt	168
	12.7 Crews Hill Defined Area	169
<b>13</b>	<b>Sustainability Appraisal</b>	<b>174</b>
<b>■</b>	<b>Appendices</b>	
	Evidence Base	175
	Sustainable Design and Construction Statements	177
	Design considerations	183
	Commercial Opening Hours	187
	Conservation Statements	191
	London Plan Car Parking and Cycle Standards	193

# Contents

Parking Design and Access Arrangements.	195
Minimum Requirements for a Site Specific FRA	197
Air Quality	199
Hazardous Installations	203
Green Infrastructure	205
Glossary	211

# Contents

# Introduction

# 1 Introduction

## 1 Introduction

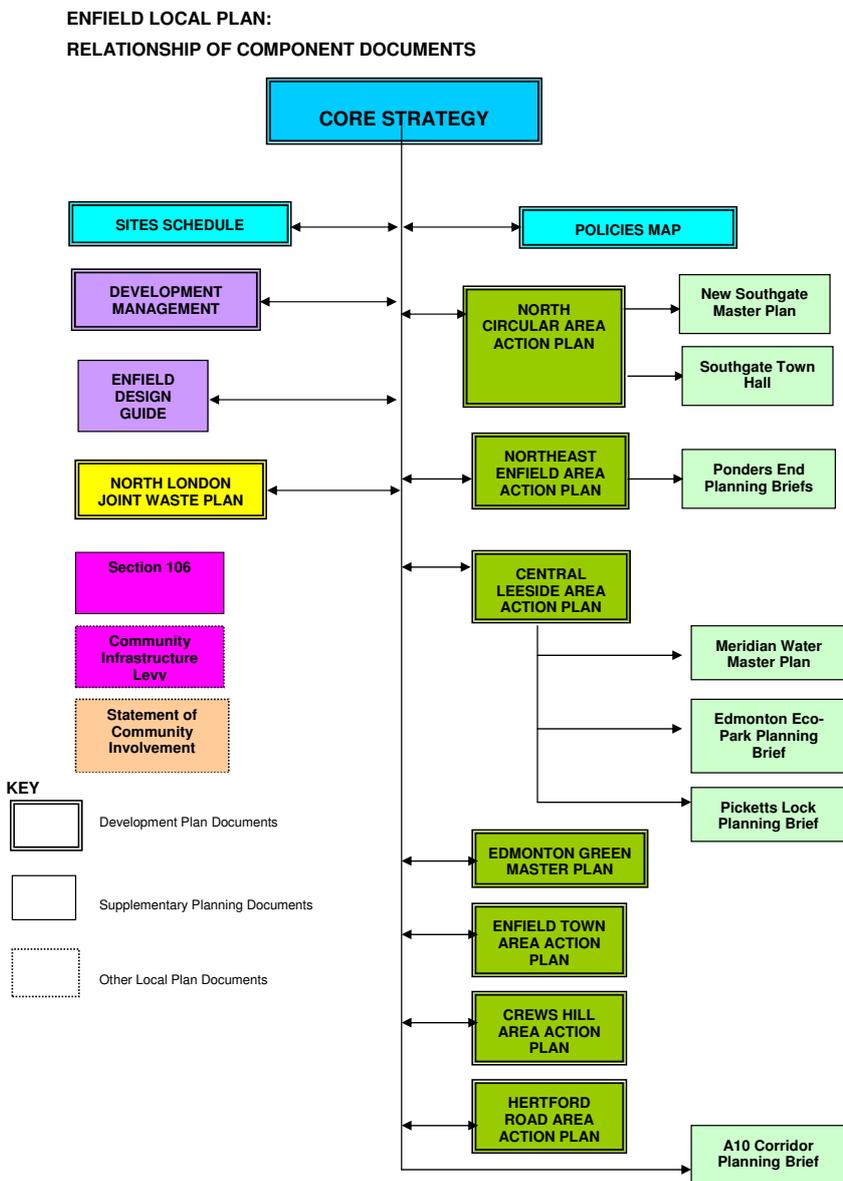
- 1.0.1** The planning system helps to decide who can build what, where and how. The purpose of the planning system is to deliver sustainable development. Sustainable development is about directing development to the right locations and delivering high standards in all new development.

### 1.1 Enfield's Local Plan

- 1.1.1** In 2010 the Council adopted its Core Strategy which sets the spatial planning framework for development of the borough over the next 15 to 20 years. It is a strategic document providing the broad strategy for the scale and distribution of development and the provision of supporting infrastructure. It contains core policies for guiding patterns of development.
- 1.1.2** The Development Management Document provides detailed land use and criteria / standard based policies by which planning applications will be determined and will be a key vehicle in delivering the vision and objectives for Enfield as set out in the Core Strategy.
- 1.1.3** The Core Strategy, Development Management Document and Area Action Plans collectively form Enfield's Local Plan. Details of the relationship between these documents and Supplementary Planning Documents can be found in figure 1.1.

# 1 Introduction

Figure 1.1



# 1 Introduction

## 1.2 National and Regional Context

### National Planning Policy Framework (NPPF)

- 1.2.1** As part of the Localism agenda and the passing of powers from Central Government to Local Government; communities and individuals, the Government published its National Planning Policy Framework (NPPF) in March 2012. The NPPF replaced the previous Planning Policy Guidance Notes and Statements.
- 1.2.2** The NPPF provides the framework within which local people and their accountable councils can produce their own distinctive local and neighbourhood plans which reflect the needs and priorities of their communities. The DMD is being prepared in consultation with Enfield's communities.
- 1.2.3** The Draft DMD is consistent with the NPPF. Alongside the Core Strategy, it contributes towards the achievement of sustainable development, sets out opportunities for development and clear guidance on what will or will not be permitted. The DMD is being prepared alongside the development of Enfield's Community Infrastructure Levy (CIL) to ensure that the costs associated with policy compliance, and infrastructure delivery do not render developments unviable.

### London Plan

- 1.2.4** The London Plan (2011) forms part of the development plan for Enfield, providing both strategic guidance and development management policies to deliver strategic objectives. The Draft DMD is in general conformity with the London Plan.

## 1.3 Key challenges and supporting evidence

- 1.3.1** The evidence base, key challenges and opportunities for the future identified in chapter 2 and appendix 4 of the Core Strategy remain relevant to the preparation of this document.
- 1.3.2** The evidence base ensures that policies are based on sound principles. A wide range of studies underpin the Core Strategy and these have been supplemented with further studies and analysis on: housing need, employment land, town centre boundaries, flood risk, energy, open space, nature conservation, Green Belt boundaries, and tall buildings and view corridors. A further viability study is also ongoing to inform both the Community Infrastructure Levy and the Development Management Document. Further details are set out in the Appendix to this document: 'Evidence Base'.

## 1.4 Development Management Document

- 1.4.1** Planning applications in Enfield are currently determined using Core Strategy policies, 'saved' policies in the Council's Unitary Development Plan (UDP) adopted March 1994, and relevant policies in the London Plan. The DMD will supplement the Core Strategy and London Plan policies and replace the remaining saved UDP policies. Each DMD policy links to one or more of the Core Strategy policies. The relationship between the policies is highlighted throughout this document.
- 1.4.2** The Development Management Document will guide decisions on planning applications within Enfield. It contains policies covering a wide range of topics, and includes the following chapters:
- Sustainable communities
  - Housing
  - Community facilities
  - Enfield's economy
  - Town centres and shopping
  - Built environment
  - Transport and parking
  - Tackling climate change

# 1 Introduction

- Environmental protection
- Green infrastructure
- Green Belt

## 1.4.1 The Policies Map

**1.4.1.1** This Draft DMD is accompanied by proposed changes to the adopted Policies Map (previously called the Proposals Map). These are detailed in the "Policies Map Document" and references to the proposed changes are made in the relevant chapters throughout this document. The "Policies Map Document" also includes additional inset maps to provide clarity on the application of policies. The following map changes and additions are proposed:

- Identification of retail park, local centre and local shopping parade boundaries
- Identification of existing tall buildings and local views
- Changes to Areas of Archaeological Importance
- Flood risk maps
- Changes to open space boundaries including Metropolitan Open Land
- Changes to nature conservation sites
- Replacement of the Area of Special Character with Areas of Special Character
- Changes to the detailed Green Belt boundary

## 1.4.2 How to make representations on this document and next steps

**1.4.2.1** The Draft DMD is published for consultation from 8th May 2012 - 3rd August 2012. Comments on the Draft DMD can be made online at <http://consult.enfield.gov.uk/portal> or sent to:

Ldf@enfield.gov.uk; or

Planning Policy Team,

Enfield Council,

Civic Centre,

Silver Street,

Enfield, EN1 3XE.

**1.4.2.2** The submission DMD will be published for a further 6 week consultation later in 2012 and will be submitted for examination in early 2013. It is anticipated that the DMD will be adopted towards the end of 2013.

Table 1.1

Stage in the Process	Date
1. Prepare SA (Sustainability Appraisal) Scoping Report, Appropriate Assessment Screening Report and Initial Equalities Impact Assessment EqIA	Complete
2. Finalise evidence base	Complete
3. Draft DMD policies, review Policies map designations, prepare SA report	Complete
4. LDF Cabinet Sub Cttee approval of Draft DMD, Policies Map and SA report for consultation	14.3.12

# 1 Introduction

Stage in the Process	Date
5. Consultation (2012 Reg 18)	8.5.12 - 3.8.12
6. Prepare Submission version and Policies Map. Final SA, EqIA and AA of policies	August- September 2012
7. Full Council approval of Submission DPD	October -November 2012
8. Consultation. Request statement of conformity with London Plan (2012 Reg 19)	December 2012 - January 2013
9. Prepare for submission	January - February 2013
10. Submit DMD for Examination	February 2013
11. Examination	February 2013- July 2013
12. Adoption	September 2013

## 1.5 How this document will be used

- 1.5.1** The DMD contains policies for all types of planning application: from householder extensions to major residential, commercial and mixed use development. It will be used by the Council's Planning Officers and Planning Committee to make decisions on planning applications.
- 1.5.2** Subject to the outcome of consultation, the Draft DMD will start to have weight in decision making following the consultation period. Greater weight will be afforded to the document as it progresses through the production process. Once adopted, policies within the DMD will be used alongside policies contained in the London Plan and Core Strategy to determine planning applications. For each draft DMD policy, reference is made to the relevant Core Strategy policies.
- 1.5.3** The DMD policies will be supplemented with Area Action Plans and Neighbourhood Plans as they emerge, which will also have Development Plan status.

## 1.6 Implementation

- 1.6.1** Policies contained within this document will be implemented through the planning application decision making process. Planning approvals, conditions, Section 106 agreements and Community Infrastructure Levy payments will be used to delivery infrastructure, facilities and services in line with the strategic direction provided by the Core Strategy.
- 1.6.2** Further guidance on the implementation of design policies will be provided through the Enfield Design Guide Supplementary Planning Document.

# **Sustainable Development**

## 2 Sustainable Development

### 2 Sustainable Development

- 2.0.1** In making decisions on planning applications, the Council will balance the need to promote economic growth, support social wellbeing through the provision of new homes and infrastructure, protect the environment and ensure the prudent use of natural resources. The Council's Core Strategy sets out economic, social and environmental planning policies based on the identified needs of the borough over the next 10-15 years. Taken together these policies define what sustainable development is for the borough. The Council's emerging Sustainability Programme also demonstrates how these elements of sustainable development can simultaneously be achieved.
- 2.0.2** The policies within this document seek to ensure decisions are made which deliver the economic, social and environmental components of sustainable development. For example, through: the protection of employment land and policies to encourage new business development; the delivery of new homes and community facilities and policies which influence wider determinants of health; the protection of open space and natural habitats; and through policies on sustainable design and construction, and energy.
- 2.0.3** A key element of sustainable development is ensuring the creation of sustainable communities. All new development is expected to play its part and should recognise and respond to the needs of communities, maximise opportunities to create sustainable communities and deliver accessible and inclusive environments. Developments will be expected to be of good design and be appropriately located. In accordance with the London Plan, new development should be designed to meet Lifetime Neighbourhood principles. Provision should be made to improve public transport, access to community facilities and local shops, open space and children's play. The public realm should be designed to be safe and inclusive to meet the needs of all, including families with small children, older people and disabled people. A mix of housing types and tenures, and employment opportunities should be provided. Collectively, the policies throughout this DMD will help to ensure the development of sustainable communities and deliver the spatial vision set out in the Core Strategy.

### 2.1 Good Design

#### DRAFT DMD 1

##### Achieving High Quality and Design-Led Development

1) Development that is inappropriate to its context, or which fails to take the opportunities available for improving an area in accordance with the below objectives of urban design, will not be accepted:

- a. **Character:** A place should have its own identity, where locally distinctive patterns of development, landscape and culture, that make a positive contribution to quality of life, are reinforced;
- b. **Continuity and Enclosure:** A place where public and private spaces and buildings are clearly distinguished, safe and secure;
- c. **Quality of the Public Realm:** A place with safe, attractive, uncluttered and effective spaces and routes;
- d. **Ease of Movement:** A place that is easy for all to get to and move around, that connects well with other places, puts people before vehicles and integrates land uses with transport;
- e. **Legibility:** A place that is easy to understand with recognisable and intuitive routes, intersections and landmarks;
- f. **Adaptability:** A place that is flexible enough to respond to social, technological and economic change;
- g. **Diversity:** A place with variety and choice, provided through the provision of a mix of compatible uses that work together to create viable places that respond to local needs.

This policy should be read in conjunction with Core Policy 30.

## 2 Sustainable Development

- 2.1.1** This strong commitment to good design supports that set out in the section 7 of the National Planning Policy Framework (2012), and in particular paragraph 64, which states that "permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions".
- 2.1.2** The above objectives of Urban Design are taken from *By Design: Urban Design in the Planning System: Towards Better Practice*. This document, originally intended as accompanying guidance for national planning policy, is widely accepted as a key text in defining the objectives of urban design and an important tool in evaluating whether aspects of development form help to achieve these objectives.
- 2.1.3** An understanding of the context (economic, environmental, social, physical, cultural and historic) within which a proposed development may sit is key to achieving the above objectives of urban design. For example, *character* can be enhanced by using, reusing or referencing current or historic layouts, uses, buildings and/or built or natural elements of the site and its surroundings. *Ease of movement* can only be achieved by understanding the origin and destination points for different modes of transportation (walking, cycling, cars etc) in the surrounding area and how development on the site may help or hinder movement between them, while maximising access to the site itself.
- 2.1.4** In all cases, respecting and complimenting the distinguishing positive characteristics of an area, (paying particular attention to the intervention's immediate context), is key to creating and promoting a sense of identity and place and integrating development into its surroundings. This does not necessarily mean creating replicas or pastiche development. Contemporary and innovative design can often enhance local identity, while reinforcing the positive aspects of an area's built form.
- 2.1.5** Additional guidance on how compliance with this policy can be achieved is included in the Appendix on 'Design considerations' and in more specific policies throughout this document. The policy complements policies 7.1-7.7 of the London Plan in particular.

### DRAFT DMD 2

#### Design Process

- 1) Applications accompanied by design and access statements that do not clearly document the design evolution and rationale behind the proposal will not be accepted.
- 2) The Design and Access Statement must meet national requirements and include:
  - a. A site analysis including site constraints, opportunities and an assessment of the context and how this may influence the design;
  - b. An explanation of how the design addresses the opportunities and constraints presented by the site;
  - c. Direct references to how the design complies with relevant planning policy and guidance.

#### Justification and guidance on implementation

- 2.1.6** Design is an iterative process which frequently involves compromise between a number of competing and sometimes conflicting objectives. There are always multiple solutions to any one problem. Therefore it is essential that the rationale behind decisions is clear and documented, so that the logic of the evolution of the design can be scrutinised and it can be ensured that the most desirable outcome has been reached. A design and access statement is already a requirement for most planning applications. This policy is intended to ensure that those statements are as useful as possible.
- 2.1.7** Applicants are strongly advised to take advantage of the pre-application advice service offered by the Council. This is particularly important for larger schemes, or where potential conflicts with adjoining sites or between different policy objectives are foreseen. The use of skilled design professionals in the development of proposals is highly recommended and can save a significant amount of time and money in the long-term.

## 2 Sustainable Development

- 2.1.8** The form of the design and access statement will need to respond, and be proportional to, the type of development being proposed. Applicants should follow the advice within *DCLG Circular 01/2006* and *Design and Access Statements: How to Write, Read and Use them* (CABE, 2007).
- 2.1.9** The design and access statement must be easy to read and use, and contain a clear and logical design rationale. Annotated diagrams are particularly useful in communicating multiple design ideas.
- 2.1.10** The Council will assess the design of proposals against the seven objectives of urban design listed in policy DRAFT DMD 1 'Achieving High Quality and Design-Led Development'. Applicants should therefore refer to these directly in the design and access statement..

## 2.2 Sustainable Design and Construction

### DRAFT DMD 3

#### Sustainable Design and Construction Statements

All new development must demonstrate the highest sustainable design and construction credentials achievable and technically feasible on site integrating best practice design standards during the design, construction and operation of the development over its lifetime.

All development will be required to include measures capable of mitigating and adapting to climate change to meet future needs.

All planning applications must be accompanied by a Sustainable Design and Construction Statement, outlining how the proposal complies with relevant local, regional and national sustainable design and construction policies proportionate to the context, nature and scale of the development and will include details stated in the Appendix ('Sustainable Design and Construction Statements') to this document. The Statement should consist of any additional reports required to demonstrate compliance with the objectives of Policies contained within the Local Plan. These may include, but will not be limited to, items on the borough's Local Validation List as follows:

- Energy Statement (all development - see DRAFT DMD 50 'Energy Efficiency Standards')
- Code for Sustainable Homes Pre-Assessment (new build residential units only- see DRAFT DMD 4 'Environmental Assessment Methods')
- BREEAM Pre-Assessment (non residential development over 1000sqm or as directed by the policy on DRAFT DMD 4 'Environmental Assessment Methods')
- BREEAM Ecohomes or Domestic Refurbishment Pre-Assessment (major residential refurbishments and conversions - see DRAFT DMD 4 'Environmental Assessment Methods')

**This Policy should be read in conjunction with Core Policies 4, 20, 21 & 22 of the Core Strategy.**

#### Justification and guidance on implementation

- 2.2.1** The Council is committed to achieve the highest standards for sustainable design and construction within the Borough. In its approach to the issue of sustainability, the Council acknowledges that a measure of sustainability is not limited to energy efficiency, but is expressed over a range of relevant measures: environmental, social and economic. The Policies contained within the Core Strategy and throughout this document represent key sustainability milestones to achieve local, regional and national commitments for the delivery of sustainable development and it is essential that the planning process, charged with the delivery of such targets, deploy appropriate, consistent and transparent tools to assess the relative sustainable merits of individual developments and continue to monitor the development over its lifetime.

## 2 Sustainable Development

- 2.2.2** Consistent with Policy 5.3 of the London Plan and the Mayors associated Sustainable Design and Construction Supplementary Planning Guidance, developments are required to demonstrate that they have achieved the highest possible standards of sustainable design and construction.
- 2.2.3** The contents of the statement are designed to encourage developers to engage with the principles of sustainable design and construction at the earliest possible point in the design process and cultivate a culture of change in the development process that will encourage innovation to realise the strategic objectives of the plan. The Sustainable Design and Construction Statement should be used to demonstrate compliance with relevant Policies contained throughout this document and should be accompanied with relevant validation documents and assessments under the Code for Sustainable Homes and BREEAM as detailed in policy DRAFT DMD 4 'Environmental Assessment Methods'.

### DRAFT DMD 4

#### Environmental Assessment Methods

In accordance with Core Policy 20 and in line with the Government's aim of promoting sustainable design and achieving Zero Carbon development and the targets contained within the London Plan, the Council will require developers to demonstrate compliance with targets relating to the following relevant environmental assessment tools:

##### 1. New build residential development

###### a. Major Development

Proposals must achieve the following standards under the Code for Sustainable Homes, or equivalent scheme or rating if this is updated:

- 2011 to 2015 – Exceed Code Level 4
- 2016 onwards – Code Level 5 and moving towards zero carbon (Code Level 6 often expressed as net zero carbon for regulated and unregulated energy)

###### b. Minor Development

Proposals must achieve Code Level 4 (or equivalent rating if this scheme is updated) where it is technically feasible and economically viable to do so.

There may be exceptional circumstances where other planning requirements or characteristics mean that the required level of the Code cannot be met. Unless such circumstances exist and are clearly demonstrated then planning permission will not be granted for proposals which fail achieve this target.

##### 2. Residential refurbishments and conversions

###### a. Major Development

Proposals must achieve the following standards under the BREEAM EcoHomes, or the emerging BREEAM Domestic Refurbishments standard, or their equivalent:

- 2011 to 2012 – Exceed a “Very Good” rating
- 2013 to 2015 – “Excellent” rating
- 2016 onwards – Moving towards an “Outstanding” rating (often expressed as net zero carbon development)

###### b. Minor Development

Proposals must exceed a ‘Very Good’ rating under the BREEAM EcoHomes or the emerging BREEAM Domestic Refurbishments standard, or their equivalent rating/scheme.

## 2 Sustainable Development

### 3. Non-residential development

Proposals involving the major refurbishment, building fit out, change of use, extension, replacement or creation of new non-residential floorspace or a combination thereof equal to or exceeding 1000sqm must achieve the following standards under the relevant BREEAM 2011 scheme or equivalent rating/scheme if this is replaced or updated as a minimum:

- 2011 to 2015 – Exceed a “Very Good” rating
- 2016 to 2018 – “Excellent” rating
- 2019 onwards – Moving towards an “Outstanding” rating (often expressed as net zero carbon development)

Due to the nature of the relevant Environmental Assessment Method it may be technically feasible and/or viable for developments under the 1000sqm threshold to achieve the above standards. In this regard, where appropriate, smaller non residential development will be required to submit the relevant BREEAM 2011 (or replacement/equivalent) pre-assessment for consideration in accordance with the Scope Section of the BREEAM Scheme Document, or replacement.

4. Where assessment (through preparation of a development brief or similar) indicates that it is technically feasible and/or viable to do so, the Council will require a higher rating, in any of the specified environmental assessment methods featured above, to be achieved for Strategic Development or major development within Strategic Growth Areas consistent with the Spatial Vision for Enfield and Strategic Objective 2 of the Core Strategy.

**This Policy should be read in conjunction with Core Policies 4, 20, 21, 22, 28, 32 & 36 of the Core Strategy.**

### Justification and guidance on implementation

- 2.2.4** The Code for Sustainable Homes (CSH) is an environmental assessment method for rating and certifying the performance of new homes. It is a national standard adopted by central government for use in the design and construction of new homes with a view to encouraging continuous improvement in sustainable home building. From 2008 all new residential developments were required to achieve a Code Level under this scheme.
- 2.2.5** BREEAM (Building Research Establishment Environmental Assessment Method) is a nationally recognised environmental standard scheme which aims to help developers minimise the adverse effects of non-residential buildings on the environment covering extension, refurbishment, fit-out and new construction of non-residential development.
- 2.2.6** The developer should demonstrate how the relevant Level of the Code for Sustainable Homes or category of BREEAM assessment will be met through the submission of a pre-assessment to accompany the application. A combination of the sustainable design and construction statement and the results of the pre-assessment will form the basis of the condition and potentially a S106 Planning Obligation for the final development. The pre-assessments must be assessed on the most detailed evidence available at the time of submission and should be undertaken by a qualified and licensed assessor.
- 2.2.7** If planning approval is given, all developments will be required to submit additional evidence in the following formats and at the following times for the consideration of the Local Planning Authority:
- a design stage assessment, conducted by an accredited Assessor and supported by relevant BRE interim certificate, shall be submitted at pre-construction stage prior to the commencement of superstructure works on site; and,
  - a post construction assessment, conducted by and accredited Assessor and supported by relevant BRE accreditation certificate, shall be submitted following the practical completion of the development and prior to the first occupation.

## 2 Sustainable Development

- 2.2.8** This policy is consistent with Core Policy 20 and the requirements of the National Planning Policy Framework (NPPF) and Policy 5.3 of the London Plan. The Renewable Energy and Low Carbon Study for Enfield (2010) concluded that the additional costs associated with meeting advanced Code levels and BREEAM ratings are relatively modest for most elements and that higher CSH and BREEAM ratings are already being achieved by developments within the borough. A significant proportion of the costs of delivering the respective standards are absorbed by meeting relevant energy efficiency standards. It is likely that these costs could be reduced further through effective supply chain management, economies of scale from the bulk purchase of materials and fittings, and innovation in design within the housing and commercial sectors, as construction practices and available technologies and evolve in tandem with improved standards.
- 2.2.9** The sliding scale showing incremental improvements over the lifetime of the plan are measured and commensurate with other Policy requirements through this document. Consistent with work by the Zero Carbon Hub and the Department for Energy and Climate Change, the Policy affords a greater flexibility in the short to medium term for the Council to impose stricter regulation on strategic sites taking account of technological advances, enhanced building practices, and viability.
- 2.2.10** Following the budget announcements of 23<sup>rd</sup> March 2011 which saw the exclusion of unregulated energy use (energy consumed by the occupants of homes through activities such as cooking and by household electrical appliances) from the definition of 'zero carbon' adopted by the government, the Council has sought to ensure that this change has been absorbed into Policy, with targets for 2016 showing Code Level 5 (100% improvement over Part L of Building Regulations 2010 for regulated energy) with a reserved position to move towards Code Levels 6 beyond 2016 (often expressed as net zero carbon from both regulated and unregulated energy consumption) where this is technical feasible and economically viable.

## 2 Sustainable Development

# Housing

## 3 Housing

# 3 Housing

## 3.1 Affordable Housing

### DRAFT DMD 5

#### Affordable Housing on Sites Capable of Providing 10 units or more

The maximum amount of affordable housing will be sought when negotiating on individual private residential and mixed use development (which include a residential element) having regard to:

- a. the borough-wide affordable housing target of 40%
- b. the need to provide an appropriate mix of tenures to meet local housing need and reflect a borough wide target of 70% social rent/Affordable Rent and 30% intermediate.

Any negotiations on an appropriate tenure mix will take into account the specific nature of the site; development viability; the need to achieve a more mixed and balanced communities; and, particularly with regards to Affordable Rent (overall proportions and rent levels), evidence on housing need and affordability. Priority will be given to delivering affordable housing at rental levels that meet the needs of low income households within the borough, particularly with regards to family sized accommodation.

Mixed tenure residential development proposals must be designed to be 'tenure blind', so that the scheme as a whole is well integrated, cohesive and complementary. Tenure should be spread throughout the development to prevent concentrations or clear distinctions.

*This policy should be read in conjunction with Core Strategy policy 3.*

#### Justification and guidance on implementation

- 3.1.1** Underpinned by evidence contained within Enfield's Affordable Housing Economic Viability Study (AHEVS) the DMD policy clarifies the position with regards to the boroughwide targets for tenure mix set out in the Core Strategy following the introduction of Affordable Rent Tenure.
- 3.1.2** Affordable Housing comprises of three tenures: affordable rent, social rent and intermediate housing. Affordable Rented housing can be offered to those eligible for social housing at rents of no more than 80% of local market rents (including service charges where applicable). The potentially higher rents charged as part of the Affordable Rent Tenure (ART) model are intrinsically linked to supporting new supply and therefore the viability of delivering new units, but also could impact the affordability for those households in need. Low income families may not be able to afford new higherrent level of up to 80%. Those in receipt of benefits will be particularly affected by the current proposed welfare reform proposals which would cap the total amount of benefits received depending on employment status making this tenure less affordable.
- 3.1.3** The Affordable Rent Tenure is listed alongside social rent in the policy above to take into account recent updates to the definition and funding of affordable housing. However, this does not mean that affordable rent can completely substitute social rent as part of development proposals as the targets in the adopted Core Strategy were based on evidence that demonstrates a clear need for new social rented housing.
- 3.1.4** To understand how the Affordable Rent Tenure can meet needs of those who require social housing, it is important to understand the relationship between this tenure and the social rent tenure. Social rented accommodation is defined by NPPF as rented housing owned and managed by local authorities and registered social landlords, for which guideline target rents are determined through the national rent regime. The rents charged for social rented housing can differ depending on whether it is provided by registered social landlords or the local authority. Average rents for social rented housing in Enfield across the range of different providers are between 36-43% of market rent (see Box 3). In comparison, as

## 3 Housing

mentioned above, affordable rent can be provided at rents of no more than 80% of market rent. At the top end of this range, this tenure is significantly above the rent levels currently charged for social housing. However, the potential flexibility within the definition of affordable rent means that depending on the amount charged for these units (i.e 40-50%) they could meet the same needs that social rent housing currently does.

- 3.1.5** The Council will only consider the affordable rented tenure as contributing towards the 70% target for social housing where it can be clearly demonstrated that the units will meet housing need and are affordable to local people.

### Box 1: Analysis of affordability

A high level analysis of survey data in the Housing Market Assessment (HMA) has been undertaken, this reviews household incomes to assess what is affordable to various household types and sizes who may require affordable housing, and what proportions can afford different percentages of market rent. This work indicates that there is still a need for social rented housing, and that within the original 70% for social rented accommodation, potentially the vast majority, 83% of people, still require social rented housing, whilst a more limited number (17%) may be able to afford to pay more than this. Applying these percentages to the existing targets would result in the following provision: 58% social rented, 12% affordable rented and 30% intermediate housing.

There are also indications that affordability is more significant for groups. A review of the evidence suggests that social rented housing serves an important role in meeting the housing needs of single parent families. In every case, the developer will have to demonstrate to the Council's satisfaction that the affordable housing product is affordable to local residents having regard to local evidence of need and affordability. This indication of need and affordability for the 3 tenures in the paragraph above will provide the starting point for negotiations.

- 3.1.6** If development proposals cannot, or it is considered not appropriate, to achieve the boroughwide targets for affordable housing on a particular site, the developer will have to provide evidence to demonstrate why, such as evidence of viability assessments, exceptional site specific circumstances.
- 3.1.7** Developments which exceed the boroughwide affordable housing targets may be acceptable where this delivers additional affordable housing, as long as this has regard to the need to create local communities which are balanced.
- 3.1.8** The Council will consider additional flexibility on tenure mix for proposals which provide 100% affordable housing. A degree of flexibility may be applied on the tenure mix of the proportion of affordable housing provided above the 40% target mark i.e. the remaining 60% having regard to evidence on viability, housing need and affordability. Registered providers are encouraged to discuss their proposals with the Council at an early stage and, as part of negotiations, will be expected to submit evidence to the Council to support and justify their proposals.

### DRAFT DMD 6

#### Affordable Housing on Sites of Less Than 10 units

A financial contribution to deliver off-site affordable housing will be required for all developments of less than ten units involving a net gain in residential units. The contribution payable will be based on targets set out in the Core Strategy.

*This policy is linked to Core Strategy policy 3.*

## 3 Housing

### Justification and guidance on implementation

- 3.1.9** All residential development where there is a net gain of units, including development involving subdivision and conversion of houses to flats should contribute towards affordable housing. For sites of less than ten units a financial contribution is required based on 20% boroughwide affordable housing target. For sites of less than ten units on-site provision at the 20% target level, because of the quantum of affordable units this would deliver, will not be appropriate due to management issues including monitoring of future nominations and to ensure unit remains affordable, maintenance and utility checks. However, it is acknowledged that on developments of less than 10 units which are 100% affordable housing, and the targets above are exceeded, the increased quantum of affordable housing development and the surety that a registered provider will be responsible for all management issues, these issues with on site provision are not relevant.
- 3.1.10** Further guidance on calculating the S106 contribution is set out in the Council's S106 Supplementary Planning Document (SPD) (2011). For ease of reference the formula for calculating affordable housing financial contributions in the S106 SPD is replicated below:

#### Box 2: Formula for calculating affordable housing on sites proposing between 1- 9 units (net)

$A$  (Open market value of the proposed unit)  $\times$   $B$  (residual land percentage - 38.2%)  $+ C$  (15 % for site acquisition and servicing costs) =  $D$  (per unit sum)

$D$  (per unit sum  $\times$  20%) = Financial contribution payable

Source: S106 Supplementary Planning Document (adopted 2011)

- 3.1.11** Contributions collected will be used in a variety of ways to deliver affordable housing (including new build, conversions and bringing empty homes into use) across the borough.

## 3.2 Housing Size

### DRAFT DMD 7

#### Providing a Mix of Different Sized Homes

All residential development should provide a mix of different sized homes in line with the borough-wide housing mix targets and policy guidance in Core Strategy Policy 5, with the exception of social housing mix targets which are updated to cover both affordable rent and social rent.

Development on sites capable of accommodating 10 or more dwellings, in particular, should reflect the borough-wide targets and policy guidance for market, social/affordable rented and intermediate housing. Development of less than 10 units should contribute towards meeting these targets by providing a mix of different sizes homes, including family sized accommodation.

Developers will be expected to take a design led approach to maximising the provision of family units, and Design and Access Statements must demonstrate that the development proposal has considered whether family units can be designed into the scheme.

*This policy should be read in conjunction with Core Strategy policy 5.*

## 3 Housing

### Justification and guidance on implementation

- 3.2.1** Boroughwide housing mix targets were established in Core Strategy policy 5 (CP 5) on the basis of evidence in Enfield's Housing Market Assessment (HMA) which considers the current and future demand for housing, and shortfalls in provision which need to be addressed. This draft DMD policy establishes how developments should contribute towards achieving this strategic policy objective for a mix of different sized homes and takes into account changes to affordable housing since the adoption of the Core Strategy.
- 3.2.2** CP 5 sets housing mix targets for forms of tenure that existed in a previous version of Planning Policy Statement 3 (PPS3): social rented and market accommodation, with the mix of intermediate housing being determined on a site by site basis. As referred to earlier, the definition of affordable housing now includes the Affordable Rent Tenure which needs to be considered in the Council's approach.
- 3.2.3** The HMA establishes what sizes of housing are required accommodate households who cannot afford market or intermediate housing. Therefore these results are still considered relevant when considering the need for different sizes of affordable rented housing and this tenure has been incorporated within the social rent targets set in the adopted Core Strategy (CP 5), which is updated and is produced for clarification below:
- Social/ affordable rented housing - 20% 1 and 2 bed units (1-3 persons), 20% 2 bed units (4 persons), 30% 3 bed units (5-6 persons), 30% 4 + bed units (6+ persons)
- 3.2.4** The Council modelled the impacts of the affordable rent tenure, particularly when this is coupled with the draft proposals in the welfare reform bill on universal credit and benefits caps, which may affect the amount available to pay for housing costs. This modelling shows that affordable rents at the maximum level of 80% charged for larger properties are likely to be unaffordable for those households with children (see Box 3). As this is the case, the affordable rent tenure will only be considered acceptable where the mix of homes being are provided are at appropriate rent levels which reflects local issues of affordability between different household types.

#### Box 3: Affordable Rent Levels and the Size of Homes

The table below gives an example of rent variation between providers for different sizes of accommodation. It is acknowledged that market rent levels are subject to change, and therefore the affordability of stated percentages based on these levels may also change. The information provided below is intended to act as an example of the type of considerations (non exhaustive) to take into account when establishing an affordable level of rent.

The table compares private market rents with different rents charged for social rented accommodation by different providers. This shows that, on average across the range of providers, people are paying between 36-43% of market rent depending of the size of the accommodation. This is significantly below the potential maximum of 80% for the affordable rent tenure in the NPPF definition for this type of housing. It also gives an indication of how an increase in the rents charged could disproportionately impact on family households, which currently are the lowest % market rent (average of 36%).

Table 3.1 Comparison of rent levels

Comparison of rent levels (per week)	1 bed	2 bed	3 bed
Rents charged for market housing <sup>1</sup>	£173	£225	£288
Rents charged for Local Authority housing	£69.70	£82.44	£94.45
Expressed as a % of market rent	40%	37%	33%

## 3 Housing

Comparison of rent levels (per week)	1 bed	2 bed	3 bed
Rents charged on re-lets of Registered Provider (RP) housing	£77.02	£94.58	£116.66
Expressed as a % of market rent	45%	42%	41%
Rents charged on new lets of RP housing	£100.11	£119.38	£121.37
Expressed as a % of market rent	58%	53%	42%
All social rents	£74.01	£93.27	£102.78
Expressed as a % of market rent	43%	41%	36%
Maximum level of affordable rents (at the 80% level)	£138.40	£180	£230.40

1. source: GLA rent data

Draft proposals in the Welfare Reform Bill could potentially impact on the money available to certain households to pay housing costs. For example, if benefits payments were to be capped at £500 per week for couples/households with children or £350 for single person households, and the assumptions about affordable housing costs in the HMA were applied, this could mean that households with children would be able to afford £150 per week and single person households could afford £122.50 per week. However, it is acknowledged that the draft proposals in the Welfare Reform Bill are not confirmed or approved.

To ensure that the affordable rent tenure would meet the overarching definition of affordable housing in the NPPF, to:

- meet the needs of eligible households including availability at a cost low enough for them to afford, determined with regard to local incomes and local house prices; and
- Include provision for the home to remain at an affordable price for future eligible households or, if these restrictions are lifted, for the subsidy to be recycled for alternative affordable housing provision,

the Council will require and assess a range of information to ensure that affordable housing of all tenures is affordable to local people and different households in need, taking account of factors which could impact on affordability.

**3.2.5** Larger sites, because of the land area available, are more capable of accommodating a mix of different house sizes and associated amenity space than smaller and potentially more constrained parcels of land. Irrespective of selecting this approach for practical reasons, the prioritisation of family homes (3+ beds units) within the housing mix targets is clear and therefore developments of every size, where the actual mix may not be delivered, should seek to prioritise the delivery of these units where the site context and conditions are appropriate.

**3.2.6** CP5 specifies the size of accommodation (in terms of bedroom numbers) required to meet housing need and also, in some cases, specifies the type of accommodation (in terms of flats or houses). The size of accommodation is a clear priority in most cases as meeting this will, as a minimum, deliver residential units of the right size to meet the functional requirements of households. The specified types of accommodation establish preferences for particular housing forms however, whilst the housing offer should aim to meet these housing aspirations and encourage people to remain in the borough over time, it is acknowledged that at the individual site level, for practical reasons, it may not always be possible to meet these. Developments should therefore reflect the size of the accommodation set out in CP 5 in line with the DMD policy above. The type of accommodation specified in CP 5 will be used as a guide to assess development proposals, however, the Council will also consider the individual site circumstances to ensure that the overall delivery of appropriate housing units is not prejudiced.

## 3 Housing

- 3.2.7** It is recognised that there may be instances where it is not feasible or desirable to achieve the targets, or where it is acceptable to exceed them, for example where development will deliver more family housing which is a priority housing need, or where it provides a specialist form of housing (considered under DRAFT DMD 19 'Specialist Housing Needs'). In certain locations, where there is an unsuitable external environment for children and more limited opportunities for amenity space, in combination with a site context which would lend itself to a higher density development (such as areas of higher PTAL and proximate to supporting infrastructure) the delivery of family housing may be more limited i.e. new development above retail shops or within retail shop frontage. Conversely in other locations, where these factors are not considerations, more family housing will be encouraged.
- 3.2.8** In the case of estate renewal schemes if existing social housing units are being re-provided as part of redevelopment proposals, and the scheme is addressing the needs of existing tenants and therefore an existing housing need (in terms of both tenure and housing size) then careful consideration needs to be given to the application of this policy. The provision of social housing is far more limited and, therefore, so are the opportunities for their housing need to be met elsewhere and there may be more immediate priorities in terms of any redevelopment. The Council will consider and justify any exceptional circumstances on estate renewal schemes.
- 3.2.9** The developer will need to provide evidence to accompany the planning application to demonstrate why targets cannot be achieved. Where this can be demonstrated, the Council will work with the developer and other partners to agree an appropriate mix taking into account a range of factors including the specific nature of the site such as its location, accessibility and overall suitability for different housing types, the priorities for housing mix, local context, site constraints, development viability, the need to create mixed and balanced communities, as well as other planning priorities and obligations being provided by the scheme.

### 3.3 Protecting the Existing Housing Stock and Residential Conversions

#### DRAFT DMD 8

##### Loss of Existing Residential Units

##### 1) Residential uses

The Council will resist the loss of existing residential units, particularly family homes, that can still be used, with or without adaptation, unless:

- a. The net loss arises from the amalgamation of smaller, separate flats within an original house or purpose built flats to create a unit of family accommodation (3 bed+); or
- b. would result in the upgrading of existing accommodation which is below minimum size standards; or
- c. it is to provide a community facility, where a specific need has been identified, there is no alternative location, and no adverse impacts on residential amenity in line with DMD policies on community facilities; or
- d. it can be clearly demonstrated that continuing residential use is not satisfactory when assessed in the light of the following:
  - The environment of the area including adjoining land uses;
  - The standard of accommodation, its amenities and access arrangements.

##### 2) Affordable housing

Proposals which involve the loss of affordable housing and of social rented accommodation in particular will be resisted unless it is replaced. However, it may be acceptable where the net loss arises from the managed replacement of housing, such as estate renewal programmes or agreed masterplans/regeneration strategies, and where the redevelopment:

## 3 Housing

- a. achieves a more appropriate mix of housing types and tenures in line with housing needs and the delivery of mixed and balanced communities;
- b. results in no overall loss in the total number of habitable rooms; and
- c. creates new units of a higher quality and design standard, and delivers a scheme which improves the wider external environment

*This policy should be read in conjunction with Core Strategy policies 2, 3 and 5.*

### Justification and guidance on implementation

- 3.3.1** The London Plan and Core Strategy commit to delivering housing targets and preventing the loss of housing. Existing residential land and buildings play an important role in meeting the borough's housing needs, particularly as a source of family accommodation. Enfield's HMA identifies an overwhelming need and demand for new housing, particularly for family units, therefore existing housing needs **to** be retained and afforded sufficient protection otherwise compensatory provision would be required, which is unsustainable.
- 3.3.2** In line with the London Plan, the Council will expect all housing to be retained where possible and appropriate, and resist its loss unless the housing is replaced at existing or higher densities with at least equivalent floorspace. However, the draft policy considers circumstances when a loss may be acceptable, including the specific need for a community facility. The Council recognises that certain uses and activities are appropriate in residential areas where they support the well-being and serve the needs of local communities. Where it can be demonstrated that there is a need for such facilities, which cannot be accommodated elsewhere, and they would not have an adverse impact on the amenity then the loss of a residential use may be acceptable.
- 3.3.3** The recommendations in the HMA prioritise meeting the need for larger family homes, the de-conversion of units to create family sized accommodation can help to meet this priority housing need. This type of development would help to balance out any over supply in smaller units delivered through new housing development. Improving the quality of housing would also help enhance the standard of provision and therefore would be supported where it continued to contribute towards meeting housing needs.
- 3.3.4** To assess the amalgamation of smaller units, consideration will be given to whether the new unit created would provide an acceptable form of family housing. It should provide 3 bedrooms or more, meet the relevant minimum floor areas and provide a good standard of overall accommodation. The Council will also consider whether the proposal would improve the housing provision by upgrading existing accommodation so that it meets or exceeds the minimum size standards (for example by combining two sub standard 1 bed flats into one 2 bed flat which meets the minimum floor areas).
- 3.3.5** If it can be proven that the environment of the area or standard of accommodation, its amenities and access arrangements are not conducive to ensuring a safe and suitable residential environment, then the Council may consider alternative uses as long as it can be demonstrated that the identified issues cannot be overcome or mitigated against, and that any incoming uses will be more appropriate. The developer will be required to justify reasons for not continuing a residential use. The developer must provide an assessment of the identified issues, potential mitigation measures, and details of and comparative analysis of the proposed incoming use.
- 3.3.6** Where there are exceptional circumstances, such as the need for a loss of homes as an enabling development to implement wider regeneration strategies/masterplans i.e. transport infrastructure, economic regeneration proposals. These competing objectives will have to be weighed up as part of a justification of the proposals and the existence of exceptional circumstances.
- 3.3.7** Any existing affordable housing would also need to be replaced at existing or higher densities, where this is appropriate, with at least equivalent floorspace. However, the policy acknowledges that a net loss of existing affordable housing across a redevelopment scheme may be acceptable via a managed process where the redevelopment would include affordable housing which would meet identified housing needs, where there is no net loss of total habitable rooms (i.e. equivalent or larger numbers of habitable

## 3 Housing

rooms being provided), and where this would create new units/housing scheme of a higher quality and design standard. When assessing whether the proposal is of a high quality and design standard, the Council will apply all of the relevant DMD policies, including the consideration of the standards of the accommodation being provided, the overall design and impacts on the wider external environment (including the potential to address inappropriate buildings through the redevelopment), and the potential to improve the sustainability credentials of the development. The proposals must be compatible with and integral to achieving the objectives of the overarching strategy which manages the process (estate renewal plan, masterplan/regeneration strategy). This requirement will ensure that any loss would be compensated by an overall improvement in housing quality.

- 3.3.8** The Council is committed to an estate renewal programme to prioritise the upgrading of some of the Council's housing estates. This involves working with local residents to identify the most appropriate solution for renewal, including the potential for refurbishment and comprehensive redevelopment. The re-provision of affordable housing will have to be considered as part of this process and therefore the policy takes into account the potential to deliver improvements to housing quality as part of agreed regeneration strategies/proposals such as estate renewal programme, masterplans or Area Action Plans. The draft policy aims to support managed programmes of housing investment which target issues of housing quality. The emerging Housing Strategy and supporting streams of work, such as an Estate Renewal Strategy and the Council's Housing Revenue Account (HRA) Business Plan, will identify opportunities and priorities for housing stock and services within Enfield.

### DRAFT DMD 9

#### Residential Conversions

The Council will protect existing housing, particularly family units which make a key contribution to meeting housing needs. The Council will generally resist proposals for the conversion of existing family units into self contained flats and houses of multiple occupation (HMO) unless the factors below can be demonstrated.

**1) For conversion of existing family units into self contained flats and HMOs:**

- a. Overall the development provides a high quality form of accommodation
- b. The conversion will not be detrimental to residential character, and would not result in an excessive number or clustering of conversions within a locality. To assess concentration/clustering, the following limits would be applied:
  - must not exceed 20% of all properties along a street; and
  - only 1 out of a consecutive row of 5 units may be converted.
- c. The conversion of the property will not lead to an unacceptable level of noise and disturbance for occupiers and adjoining properties;
- d. The parking and refuse storage arrangements for the scheme are adequate and do not, by design or form, adversely affect the quality of the street scene;

**2) For the development of Houses of multiple occupation (HMO) only:**

- a. Must have communal/shared facilities (including toilet/personal washing and cooking facilities) i.e. should not have self contained units

**3) For the conversion of existing family units into self contained flats only:**

- a. Compensatory provision for family accommodation (3 bedrooms +) can be provided within the development unless the accommodation is required to meet an identified need for a specialist form of housing in accordance with DRAFT DMD 19 'Specialist Housing Needs'
- b. Overall, each new unit provides a high quality of accommodation and meets the minimum internal floor areas in DRAFT DMD 12 'General Standards for New Residential Development';

## 3 Housing

- c. All flats (where possible and appropriate) or at least 1 flat should have direct access to or communal use of the amenity space provided;
- d. The units created are self contained;
- e. Where practical and reasonable, the development provides for the future adaptation of the home to cater for the changing needs of the occupiers, in line with the principles of Lifetime Homes;

#### 4) For Residential Annexes only:

- a. Where part of a residential unit is being converted for use as a residential annex, the proposal must satisfy the following criteria:
  - be ancillary to the main dwelling and not a self contained unit of accommodation
  - must not have independent entrance from the main dwelling
  - must maintain significant internal linkages with the main dwelling
  - Share communal facilities with the main dwelling
  - where applicable, accommodate the care needs of the individual
  - be capable of complete re-integration

*This policy should be read in conjunction with Core Strategy policies 5 and 6.*

### Justification and guidance on implementation

- 3.3.9** Residential conversions play an important role in increasing housing supply, and where appropriate, can represent an efficient use of the housing stock. However, the uncontrolled intensification of residential uses can lead to unacceptable change in the character of established residential areas and impact on residential amenity, by affecting services, facilities or infrastructure; the quality of local accommodation; and parking and congestion problems. Enfield's Characterisation studies acknowledge the impacts of flatted development in parts of the Borough.
- 3.3.10** Moreover, where this involves the conversion of family units (3 bed +), this type of development can undermine the overall supply of larger units and our ability to meet these housing needs in future. Resisting the conversion of family units into smaller flats will help to sustain a supply of these homes, ensure that we are not undermining the strategic housing mix targets by allowing the oversupply of smaller units, help achieve the right housing mix and delivery of mixed communities. Given these circumstances, residential conversions will only be acceptable when it can be demonstrated that the proposals can address the concerns associated with this type of development.
- 3.3.11** The Town and Country Planning (Use Classes) Order was amended in 2010 to update Part C of the Schedule, including Classes C3. Dwellinghouses and C4. Houses of Multiple Occupation (HMO). This amendment allows changes of use between single household dwellinghouses and shared houses or HMOs to take place without the need for planning permission. Class C4 "house in multiple occupation" is defined as houses occupied by between 3 and 6 unrelated individuals as their only or main residence, where basic amenities are shared <sup>(1)</sup>. The definition of use under C3 hinges on buildings being occupied by a single household, whilst C4 can be occupied by separate households (between 3 and 6 unrelated individuals), but these households must share one or more basic amenities (a toilet, personal washing or cooking facilities).
- 3.3.12** When the changes were announced, the Coalition Government commented that if necessary local authorities should use existing direction making powers to restrict these permitted development rights at the local level. Uncontrolled HMO development, like other residential; conversions, can create a number of problems similar to those listed above. However, they also meet housing needs by providing often cheaper forms of accommodation for single people, who can choose to live together to share and reduce their overall housing costs. Changes to the Local Housing Allowance have extended the Single

<sup>1</sup> the definition of HMO does not include a converted block of flats to which section 257 of the Housing Act 2004 applies but otherwise has the same meaning as in section 254 of the Housing Act 2004

## 3 Housing

Room Rate to under 35s, previously it was under 25s. This means that there may be increased demand for HMO accommodation. A lack of accommodation for these groups of people could result in increases to homelessness, and therefore consequent demands on Council's housing service, and more generally, would restrict the housing opportunities for single people who also need cheaper and more flexible forms of accommodation. The draft policy would apply to HMOs which do require planning permission but, as the Council considers its future approach towards this form of development, this could apply to all HMOs falling within Class C4 if an Article 4 direction(s) is taken forward.

- 3.3.13** It is acknowledged that larger 5-6 bed+ properties (as originally constructed), could still contribute towards meeting a priority housing need if converted into smaller self contained family units (3 and 4 bed units). Compensatory provision for family accommodation would be required as part of flat conversion development, to ensure no net loss of family housing. For the purposes of this policy, compensatory family housing would be accommodation providing three or more bedrooms (at least one of which is a double bedroom) with direct, ground floor access to dedicated amenity space. For HMOs which require planning permission, compensatory provision will not be required as it is recognised that this may not be practical and by meeting the requirements of a HMO (which is non self contained accommodation) can readily revert back to a single family dwelling house. If a developer applies to change the use from a HMO to a flat conversion, then compensatory provision will be required.
- 3.3.14** Development would be expected to provide a high standard of accommodation which caters for the needs of the household, in terms of the amount and design of the internal space. Taking into account its individual and cumulative impact, the Council will seek to ensure that would not adversely affect the amenities of neighbouring properties through noise and disturbance, or result in parking issues. There are particular concerns surrounding the potential impact on the special character of existing residential areas, such as the provision of separate independent access, revised parking arrangements and external configuration.
- 3.3.15** The Council will assess whether the development would affect the character of the area and then whether it would result in an excessive number or clustering of flat conversions in a locality by applying a 20% limit for conversions along any street/road, and in conjunction with a requirement that only 1 out of a consecutive row of 5 units may be converted. This limiting factor does not mean that developments can continue right up to the 20% level or create a presumption that flat conversions are always acceptable on streets where there are no examples of this development type at present. There may be cases where a single new flat conversion would undermine a strong established character, and the development would be considered to be unacceptable.
- 3.3.16** The following factors will be taken into account in assessing the impact of development on residential character:
- If the layout of dwellings and their gardens are so designed that further on-street parking or the use of front gardens for parking purposes would have a particularly adverse effect on the quality of the street scene;
  - If there are dwellings which have a particular architectural uniformity or style which could only be effectively retained if the dwellings remained in single family occupation;
  - the existing juxtaposition of dwellings and the potential for a conversion to exacerbate issues with noise and disturbance;
- 3.3.17** The protection of the existing character of a locality is a particularly important issue in the case of Conservation Areas. For this reason there will be a general presumption in Conservation Areas against the conversion of single dwellings into flats.
- 3.3.18** A "road" shall be regarded as the full length and both sides of an individually named highway. However, where such a highway is exceptionally long, it may be sub-divided for the purposes of applying this standard, having regard to:

## 3 Housing

- a. The size, type and character of properties which front the road;
- b. Clear and extensive breaks in the residential frontages of the road, such breaks including road junctions and major land use changes.

**3.3.19** In the case of classified roads, each side of the highway will be treated individually for the purposes of the percentage calculation and split in length, where appropriate, on the basis of the factors given above. If after applying the above, this would still result in a significant amount of properties, at least 100 properties must be surveyed. Purpose built flats will be included in the percentage calculation

**3.3.20** Residential annexes can help households adapt to changes in their circumstances. They form part of a existing residential unit and provide living quarters for a separate household,so for example, they can provide accommodation for family members who form a separate household and carer/support/childcare workers. This form of accommodation may become increasingly important as people become empowered to choose how their health and social care needs are met under the Personalisation Agenda. However, these must not undermine the overall supply, through complete subdivision, or character of the borough through over-intensification.

### 3.4 Standards for New Development

#### DRAFT DMD 10

##### Residential Character

Proposals will only be supported where it is clearly demonstrated that the following principles have been applied to arrive at a density figure appropriate to the locality:

- a. The scale and form of development is appropriate to the existing pattern of development or setting, having regard to the typologies set out in Enfield's Characterisation Study and the descriptions of the different housing types and wider character of places within the Borough. The development must successfully integrate with the existing form of development and will be resisted if it compromises the quality of the local environment;
- b. The development delivers a housing output having regard to policies on housing mix;
- c. A high quality of design and standard of accommodation is achieved, in line with policies in the London Plan, DRAFT DMD 12 'General Standards for New Residential Development' and other design polices in the DMD;
- d. The density of development has appropriately considered existing or planned transport capacity;
- e. The density of development takes into account the local provision of social infrastructure such as local shops, public and private open space, and community, leisure and play facilities as appropriate;

Applying the lower or higher end of the density ranges in the London Plan may be acceptable where clearly and robustly justified, taking into account the size of the development and its context. Going above the density ranges may be appropriate in the case of developments in the Council's regeneration areas where this can be justified through the development of a masterplan/planning brief where there are opportunities to comprehensively consider and address the issues.

*This policy should be read in conjunction with Core Strategy policy 5 and London Plan (2011) policy 3.4.*

#### Justification and guidance on implementation

**3.4.1** In line with the London Plan (policy 3.4) and Core Strategy, this draft policy outlines the key principles to be considered to ensure the scale of development is appropriate to the character of the locality, responsive to housing needs, and is well serviced in terms of infrastructure.

## 3 Housing

- 3.4.2** Enfield Characterisation Study identifies areas of different residential forms and the distinct character of places within Enfield, which provide the existing backdrop for development. This Study highlights key issues which need to be addressed including areas where inappropriate 'densification' is detrimental the character of places.
- 3.4.3** The AAPs/masterplans are preparing development strategies for large areas of the borough, some of which are vacant or under-utilised employment areas which are currently relatively isolated from existing residential areas and therefore potential influences on character. It is also anticipated that these areas will benefit from enhanced infrastructure. In line with the London Plan, the draft policy acknowledges that larger developments in areas of indeterminate character have the ability to create their own setting and therefore higher density may be permitted where they are justified and can be considered within the context of wider masterplan/planning framework for the area.
- 3.4.4** For planning purposes a habitable room is usually defined as "any room used or intended to be used for sleeping, cooking, living or eating purposes. Enclosed spaces such as bath or toilet facilities, service rooms, corridors, laundries, hallways, utility rooms or similar spaces are excluded from this definition." Only kitchens which are above 13 square metres are counted as a habitable room. Where kitchens or kitchen/diners exceed 13 sq metres and are capable of subdivision, they may be calculated as separate habitable rooms.
- 3.4.5** If a separate study is provided, for the purposes of density and counting habitable rooms, this will be counted as an additional bedroom, to assess the maximum possible density and therefore the acceptability of the proposals should this room convert to this use in the future.
- 3.4.6** Residential density figures should be based on net residential area, which only includes homes, gardens/open spaces and internal access roads.
- 3.4.7** The Council will have regard to London Plan guidance on implementing appropriate density in different circumstances, including mixed use development. Any additional guidance will be provided in the Enfield Design Guide, or on an area specific basis in the Area Action Plans.
- 3.4.8** Developers must detail in submitted *Design and Access Statements* how they have assessed the policy considerations above and responded to the guidance paragraph below to arrive at an appropriate density figure (to be stated as part of the planning application).

### **Setting**

Supplementary Planning Guidance to the London Plan provides additional detail on implementing the Density Matrix. Some of the key principles are covered below:

#### ***Large sites***

- 3.4.9** Large sites have the capability of defining their own setting, however the size of site this could apply to depends on:
- the quality of the existing built environment i.e. would departing from an existing pattern of development and density compromise the character of the area, having regard to local evidence of character in Conservation Character Area Appraisals and Wider Characterisation Studies.
  - how legible the setting of the areas surrounding the site i.e. would the development be at odds with the prevailing character and form of development and blur the distinction between areas with different settings.
- 3.4.10** Defining the setting for new development of large sites should take into account PTAL and distances to town centres and other infrastructure.

#### ***Small sites***

## 3 Housing

**3.4.11** For small sites, special attention will be given to factors influencing the setting of the individual development site, including existing streets, massing and design of the surrounding built environment. Having regard to local evidence and design guidance, developers must:

- Provide an assessment of the character/setting within the immediate vicinity of the development i.e. adjacent sites and the streetscape; and
- Consider the wider context and setting of the development

**3.4.12** Anomalous developments, which can be considered to be developments rendered conspicuous by their difference when compared to adjacent sites and the area, will not be considered sufficient justification to define a setting if they are not proximate to the proposed development, particularly if they are considered inappropriate in line with DRAFT DMD 44 'Tall Buildings', and therefore can not be used to justify inappropriate densities.

### ***Sites on the edges of settings***

**3.4.13** Where the development is on the edge of different settings, the design proposal must demonstrate how the development mediates between the two. It will not be appropriate just to adopt the setting which suggests a higher density as this could lead to the uncontrolled spread of high density development into lower density areas and vice versa.

### **PTAL**

**3.4.14** PTAL can vary significantly across relatively short distances which may have potential to skew expectations of the appropriate density of development. Where this is the case, developers may be required to submit site specific assessments of public transport accessibility as part of transport assessments for major development, taking into account local transport networks including pedestrian routes and take a design led approach.

### **Transport Capacity**

**3.4.15** The Council will only assess planned capacity when the transport measures form part of proposed s106 commitments or infrastructure providers have committed to delivering schemes, for example where they are identified in their delivery plans/programmes within the appropriate phasing period.

### **Housing Need and Quality**

**3.4.16** The form of housing output needs to be determined primarily by an assessment of housing requirements. The boroughwide targets for the mix of housing types for social/affordable rent and market homes prioritise the delivery of larger homes to meet this housing need. The delivery of intermediate units would be assessed on a site by site basis.

**3.4.17** Where developments are proposed which are above the relevant density ranges, the proposals must perform well against liveability criteria:

- At least meet and elevated expectations to exceed the minimum space standards
- Provide high quality amenity space
- Have clear management and maintenance arrangements
- Are sustainably designed and constructed to ensure residents are not compromised in terms of future adaptability and mitigation for climate change

### **Local provision**

**3.4.18** For the purposes of applying this policy, local provision will be interpreted as meaning within a reasonable distance from the development, however the distance to be applied will vary depending on the facility and in line with other DMD policies:

- Retail: to be considered with regards to travel distances to a town centre or shops

## 3 Housing

- Open Space: to be considered in line with open space hierarchy and the areas identified as being deficient in the provision of open space
- Play Space: to be considered in line with play space standards and the areas identified as being deficient in the provision of play space

**3.4.19** The Council will consider existing and planned capacity, so if, as part of development proposals, these facilities are going to be adequately provided then the implications of this will be considered.

### DRAFT DMD 11

#### Development of Garden Land

The Council will prioritise the appropriate reuse of previously developed land in order to encourage sustainable forms of residential development.

The Council will seek to protect and enhance the positive contribution gardens make to the character of the Borough, and will adopt the presumption against new residential development on garden land unless it can be demonstrated that:

- Increasing the density of the site would be appropriate taking into account the site context in terms of its location, accessibility and the provision of local infrastructure;
- The original plot is of a sufficient size to allow for additional dwellings which meet the standards in DRAFT DMD 12 'General Standards for New Residential Development', (and other design policies);
- The individual plot sizes, orientation and layout created are appropriate to, and would not adversely impact on the residential amenity within the development, or the existing pattern of development in that locality;
- An adequate amount of garden space is retained within both of the individual plots in accordance with the minimum amenity space standards (DRAFT DMD 13 'Amenity Space'), and the role of each space is enhanced to contribute towards other plan objectives such as biodiversity; green corridors and networks; flood risk; climate change; local context and character; and play space;
- The proposals would provide appropriate access to the public highway;
- The development would be in accordance with the relevant general development considerations in policy DRAFT DMD 12 'General Standards for New Residential Development'.

*This policy should be read in conjunction with Core Strategy policies 2 and 4.*

#### Justification and guidance on implementation

**3.4.20** NPPF prioritises previously developed land or brownfield land for development. Private residential gardens are excluded from the definition of previously developed land. The use of previously developed land instead of gardens is usually the most sustainable option, as it fits within an existing pattern of development, means that development can take advantage of and contribute towards improving existing infrastructure, and the reuse of derelict land or existing buildings helps alleviate the pressure to develop green field sites.

**3.4.21** The London Plan (2011) lends strategic support at the regional level for the presumption against garden land development where locally justified. The London Plan asks boroughs to recognise the important roles that this land plays both at the local and regional level. Within Enfield, private residential gardens are key to maintaining the distinct suburban character of the borough, providing access to open space and space for play, in contributing towards local biodiversity, climate change mitigation and managing the heat island effect, and flood risk. The above policy accords with these principles and adopts a presumption against the development of garden land for new residential dwellings. However, the policy

## 3 Housing

criteria recognise that there may be opportunities to increase the density of sites if this intensification can be supported by the necessary infrastructure and may be in keeping with the context of more urban parts of the borough, such as within town centres.

**3.4.22** Enfield's Characterisation Study describes perimeter blocks with houses fronting the road and enclosed gardens as a key characteristic of the borough's form of development. Often, development of garden land can disrupt this pattern of development and can be difficult to develop successfully. This type of development does raise a number of issues as part of planning applications, including the impact of the cumulative loss of gardens, the intensification of residential uses and the resultant quality of accommodation and residential amenity for the new occupiers and their neighbours. For the principle of this type of development to be acceptable the development must demonstrate that it can provide high quality residential development and that the remaining amenity/garden space will be high quality and able to perform a number of roles in order to compensate for a loss in the overall quantity of this space. If the remaining space is efficient enough to performs these roles it will also help to contribute towards wider strategic objectives.

**3.4.23** A consideration of how proposal for new residential dwellings meets the above policy objectives will be detailed in a submitted *Design and Access Statements*. Extensions to existing residential properties will be assessed separately against policies in the Residential Extensions section.

### DRAFT DMD 12

#### General Standards for New Residential Development

- 1) Proposals for new residential development will only be permitted on sites where they fulfil the following relevant criteria:
  - a. They are appropriately located, taking into account the nature of the surrounding area and land uses, access to local amenities, and any proposed mitigation measures;
  - b. They are appropriate in terms of their scale, bulk and massing;
  - c. They preserve amenity in terms of daylight, sunlight, outlook, privacy, overlooking, noise and disturbance;
  - d. All units should meet or exceed minimum space standards in the London Plan and London Housing Design Guide;
  - e. Provide a well-designed, flexible and functional layout, with adequately sized rooms in accordance with the London Housing Design Guide;
  - f. All units meet Lifetime Homes Standards and, in line with local and Mayoral guidance relating to accessible housing, 10% of all units (of different sized homes) should be wheelchair accessible or easily adapted for wheelchair users and the building as a whole should be designed to be accessible for wheelchair users<sup>(2)</sup>;
  - g. They provide high quality amenity space as part of the development in line with DRAFT DMD 13 'Amenity Space';
  - h. Play space should be provided in line with DRAFT DMD 73 'Children's Play Space';
  - i. The access, parking and refuse storage arrangements for the scheme are adequate and do not, by design or form, adversely affect the quality of the street scene;
  - j. They have appropriate regard for and can enhance the character/appearance of the property and surrounding area, including the use of appropriate materials, architectural detailing, roof treatment and configuration, and landscaping;
  - k. Hardstandings do not dominate the appearance of the street frontages or cause harm to the character or appearance of the property or street, and are permeable in line with DMD policies on Flood Risk;
  - l. Boundary treatments do not dominate or cause harm to the character or appearance of the property or street and maintain visibility splays. In the case of front boundary treatments, the height should not normally exceed 1m;

<sup>2</sup> The London Plan refers to the Habinteg Wheelchair Housing Design Guide and the Mayor of London Wheelchair accessible Housing Best Practice Guide for further guidance on relevant design criteria. However, the Council will require the enhanced standards for door entrances/clear openings and thresholds, door widths for example should be 900mm.

## 3 Housing

- 2) In addition to relevant factors above, extensions and alterations must also:
- a. allow for the retention of an adequate amount of amenity space as part of the development in accordance with the minimum amenity space standards; and
  - b. remain sub-ordinate and ancillary to the main dwelling.

Residential schemes must make an appropriate design response having regard to relevant evidence, particularly in Enfield's Characterisation Studies, and any local or area specific design guidance as part of their Design and Access Statement.

*This policy should be read in conjunction with Core Strategy policies 4 and 30.*

### Justification and guidance on implementation

- 3.4.24** Enfield's Core Strategy establishes overarching principles to direct residential development to suitable locations and create sustainable communities which offer a range of community facilities, good access to jobs, key services, and infrastructure. In the Core Strategy, this direction is given by the spatial strategy and policies which prioritise the development of previously developed land, integrate development with and align it to existing or planned services and infrastructure capacity, aim to minimise flood risk, protect important land uses, open space and green belt.
- 3.4.25** National and regional policies refer to the importance of good quality housing. Housing is a significant land use within Enfield therefore the design of residential environments can have a considerable impact on the quality, attractiveness and character of the environment. Enfield's Characterisation Studies highlight key issues with different forms of residential development and the wider character of residential areas across the borough. Developers need to proactively address relevant issues through the design of new development. In response to all of these issues and in conjunction with Core Policy 4, this policy 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. The Council will provide more detailed design guidance for residential development as part of the Enfield Design Guide.
- 3.4.26** The London Plan and London Housing Design Guide (LHDG) provide a renewed focus on improving housing quality and design, particularly the need for new dwellings which are large and flexible enough to meet the changing needs of a household. Applying minimum space standards will help to ensure that residential development can achieve these objectives. Lifetime Homes Standard and wheelchair accessible housing provide adaptable enough to accommodate different functional requirements. The internal configuration is not the only important consideration, wheelchair accessible units need to be within a building which, as a whole, is designed to be accessible to wheelchair users. Both the external and internal environment are important to the wellbeing of the occupiers. The internal layout and design influence the 'liveability' of a space, and if well designed can contribute to a greater sense of wellbeing and provide flexibility which will mean a more sustainable outcome over the long term. The Council will have regard to guidance in the LHDG when assessing planning applications, unless the guide is superseded by standards presented in the suite Enfield's Local Plan and Supplementary Planning Documents or where requirements referenced in the LHDG are updated, such as amenity space, wheelchair accessibility, Code for Sustainable Homes and Lifetime Homes requirements.
- 3.4.27** The London Plan requires development with family housing to take into account the needs of children. Access to open space and play space open up avenues for passive recreation, play, sport, and provide contact with to the natural environment for children and young people. Where housing is proposed which will generate additional numbers of children, development should make an adequate contribution to address these needs.

### *Minimum Space Standards*

- 3.4.28** The following minimum space standards will be applied in line with the London Plan and/or the London Housing Design Guide (Interim Edition):

## 3 Housing

- Minimum floor areas

Table 3.2

	Dwelling type (bedroom (b)/persons-bedspaces(p))	GIA (sq m)
Flats	1p	37
	1b2p	50
	2b3p	61
	2b4p	70
	3b4p	74
	3b5p	86
	3b6p	95
	4b5p	90
	4b6p	99
2 storey houses	2b4p	83
	3b4p	87
	3b5p	96
	4b5p	100
	4b6p	107
3 storey houses	3b5p	102
	4b5p	106
	4b6p	113

**3.4.29** For dwellings designed for more than 6 people, at least 10 sq m gross internal area should be added to the minimum standard for 6 person accommodation for each additional person. For the purposes of this document, studio flats are defined as accommodation usually consisting of a continuous/non compartmentalised space (for sleeping and living in), a bathroom and sometimes a separate kitchen.

**3.4.30** For residential units within the roof space, the space within the eaves can provide the opportunity for storage space. Where these are allocated and appropriate for storage, these areas may be counted and therefore deducted from the storage space requirements specified in the London Housing Design Guide.

- Floor to ceiling heights: The minimum floor to ceiling height in habitable rooms should be 2.5m between finished floor level and finished ceiling level. A minimum floor to ceiling height of 2.6m in habitable rooms is considered desirable and taller ceiling heights are encouraged in ground floor dwellings.

*Dwelling functionality*

## 3 Housing

**3.4.31** When assessing part e) of the above policy, the Council will particularly consider the following:

- Dual aspect: Developments should avoid single aspect dwellings, particularly those which are north facing, exposed to noise exposure categories C or D, or contain three or more bedrooms. If single aspect dwellings are proposed, the developer must demonstrate why dual aspect units cannot be included and how good levels of ventilation, daylight and privacy will be provided to each habitable room and the kitchen.
- Flexibility in the design of living spaces: open plan living can provide efficient uses of space and this layout is desirable to certain households, however a choice of accommodation is required as a one size fits all approach will not meet all housing aspirations. Therefore, the overall proportions of units should reflect the need for choice and allow for the flexibility and future for adaptation i.e the ability to separate living spaces in an open plan layout or the provision of units which do not have a open plan layout.
- Storage Space: The minimum space standards in the London Plan allow for a certain amount of built in storage space. In line with the London Housing Design Guide, to be useful the general internal storage space should be free of hot water cylinders and other obstructions, with a minimum internal height of 2m. Additional storage is encouraged particularly on the ground or basement level for flats to accommodate outdoor equipment, prams etc.
- Drying space: there is dedicated space to accommodate the drying of clothes in line with the Code for Sustainable Homes
- Study/Work: Dwelling plans should demonstrate that all homes are provided with adequate space to be able to work and study from home in line with the Code for Sustainable Homes requirements.

### *Daylight and sunlight*

**3.4.32** New residential buildings should be designed, in terms of their layout and orientation, to take advantage of daylight/sunlight to allow for passive heating and cooling and the use of micro generation technology. This may not be possible for extensions to existing properties or infill development which need to have regard to the existing building lines along the street. Appropriate levels of daylight/sunlight for new development will be assessed in accordance with minimum standards in the Code for Sustainable Homes technical guidance and the London Housing Design Guide. Daylighting/sunlighting studies should demonstrate that developments are designed to maximise the use of natural light.

### *Disturbance*

**3.4.33** When assessing the potential for disturbance, the Council will consider whether:

- Rooms of compatible uses are stacked above or adjacent to each other;
- Development limits noise from external sources by orientating sound sensitive rooms to face quieter external spaces;
- Larger developments have been designed to create quieter external spaces between dwellings;
- Building and dwelling layouts limit the transmission of airborne and impact sound from common areas, lifts and refuse chutes

## DRAFT DMD 13

### **Amenity Space**

1) Private amenity space provided as part of new development must meet or exceed the following minimum standards:

## 3 Housing

Table 3.3

	Dwelling Type	Average private amenity space (across the whole site)	Minimum private amenity space for individual dwellings
Units with access to secure shared space, not accessible to the public	1p	N/a	4sqm
	1b2p	N/a	5sqm
	2b3p	N/a	6sqm
	2b4p	N/a	7sqm
	3b4p	N/a	7sqm
	3b5p	N/a	8sqm
	3b6p	N/a	9sqm
	4b5p	N/a	8sqm
	4b6p	N/a	9sqm
Units without access to secure shared amenity space	2b4p	38sqm	23sqm
	3b4p	38sqm	23sqm
	3b5p	44sqm	29sqm
	4b5p	44sqm	29sqm
	4b6p	50sqm	35sqm

2) In addition to the standards for private amenity space set out above, flatted units should provide communal amenity space which:

- a. Provides a functional area of amenity space having regard to the housing mix/types to be provided by the development;
- b. Is overlooked by surrounding development;
- c. is accessible to wheelchair users and other disabled people;
- d. has suitable management arrangements in place.

3) To assess the quality of the amenity space, the following factors will also be considered:

- a. The overall quality of the space and whether it can meet the reasonable needs of the residents (how usable the space is);
- b. Whether the private amenity space can be adequately screened;
- c. Where there are opportunities to, is designed to take advantage of direct sunlight.

*This policy links to Core Strategy policy 4.*

## 3 Housing

### Justification and guidance on implementation

- 3.4.34** Amenity space associated with housing supports opportunities for play, sport, biodiversity, socialising, to engage in interests such as gardening and food production. Amenity space, as spaces around the built form, can also contribute to the character of places and in the adaptation to climate change by providing a break and often vegetated backdrop to the street scene. Access to multi-functional amenity space can enhance the 'liveability' and enjoyment of people's homes.
- 3.4.35** A minimum standard of provision is necessary to ensure that any amenity space provided is functional. It is acknowledged that providing private amenity space as part of flatted development may present different challenges than housing schemes due to the higher numbers of units which are accommodated and distributed across different storeys on the site. However, both types of development still need to offer access to good quality amenity space. For flats, the functions of amenity space can be divided between separate private areas (such as for private dining, sitting out) and communal areas (to provide larger spaces to gather with friends, for children's play) and this approach is reflected above in terms of the need to provide private amenity space for each unit and then communal amenity space for flatted developments as a whole to take into account the requirements of the different housing types within the scheme. For housing schemes, or schemes where there is no provision of additional secure, shared amenity space, it is practical to provide private amenity areas which fulfil these functions in one space.
- 3.4.36** The overall quality and design of amenity space is also important to how successfully it functions, screening to facilitate privacy, accessibility, sunlighting to allow for prolonged usage and management arrangements can help to create a space which is attractive and inviting therefore promotes the use of the space for leisure and relaxation.
- 3.4.37** Private amenity space is defined as open space which is accessible only to and screened for the purposes of the resident/residents of the dwelling. It does not include space designated for utilitarian purposes such as access roads, driveways, garages/car ports/car parking spaces, outdoor storage areas (for refuse recycling etc); or landscaped areas which provide a setting for the development such as front gardens. Amenity space must be able to be capable of being used by residents, accessible for maintenance purposes, and it should not be severed from the development. Amenity space should consist of a single plot of regular shape, sited immediately to the rear (or exceptionally at the side) of the dwelling.
- 3.4.38** Residential amenity space can be provided in the form of a garden, terrace, balconies/wintergardens, however, the appropriateness and amount of each type will depend on the nature of the housing being provided (as indicated in the paragraphs below). Balconies/wintergardens/roof terraces may be included as private amenity space provision where they would not be detrimental to the privacy of adjoining occupiers. Where noisy and/or there are issues with air quality, wintergardens are preferred above balconies.
- 3.4.39** All residential development should provide access to private amenity space. For family accommodation, whether houses or flats, there should be direct and dedicated access to amenity space at the ground floor level of the unit. It will be acceptable, however, for family flats above the ground level and for smaller flatted units to provide a mixture of private and semi-private or communal amenity space, as the provision of private amenity space for these occupiers is not necessarily achievable or appropriate.
- 3.4.40** The standards for private amenity space set out in the policy represents the minimum requirement for individual unit types and an average which needs to be met across the development as a whole. An absolute minimum standard is applied to ensure that all units have usable amenity space, however, this does not take into account the potential for permitted development extensions. Where the development just meets the minimum, the Council may remove permitted development rights to ensure that the minimum standard remains as amenity space. Meeting an average standard will help to provide a choice of accommodation within the development and across the borough; to cater for those who want larger, or smaller spaces; and to allow flexibility in the design and layout of sites.
- 3.4.41** The minimum requirement will not represent an acceptable standard of provision on all sites, there will be cases where new development will be required to provide more amenity space, such as when the development is within an area with identified open space or play deficiencies, or where amenity space

## 3 Housing

makes a greater contribution towards setting and the character of areas, having regard to Conservation Area Appraisals and the Characterisation Studies. However, any units which are below the minimum standard will not be acceptable. In line with the London Housing Design Guide, in exceptional cases, where it is impossible as part of new flatted development to provide all dwellings with sufficient private amenity space up to 5% of the units may instead be provided with more internal floor area (within the principal living areas) equivalent to the under provision of the minimum private amenity space. This would only apply to units which already meet the minimum internal floor areas to ensure they realise an actual increase in space. The remaining 95% of units should meet at least the minimum private amenity space standards.

**3.4.42** These standards apply equally to all tenures. The Council will not consider it acceptable for any under-provision or application of any minimum standards to disproportionately affect affordable housing tenures; there must be a demonstrable balance in the quality of accommodation across tenures.

**3.4.43** Development should demonstrate in the *Design and Access Statement* how the design of the amenity space accords with best practice. General open space and children and young people's play space provision, and what is required from development schemes in relation to these, is covered separately in the Chapter on Green Infrastructure.

### DRAFT DMD 14

#### Distancing

Proposals for all residential development should maintain distances from adjoining development/land to allow for adequate sunlight/daylighting and facilitate a sense of privacy. The following factors will be considered as part of any assessment of planning applications for residential development.

The rear facing and side windows on new residential accommodation should maintain the distances in table 3.4, unless:

- a. where the proposal envisages the siting of a building at less than this distance, the developer can demonstrate that:
  - the development would still receive an acceptable level of daylight/sunlight as assessed by a day lighting/sunlight assessment;
  - the development would still provide and allow for the maintenance of privacy;
  - the lesser distance would still conform with the general appearance of the existing street scene;
  - this would still allow for the possibility of a similar development on adjoining sites without infringing the daylight and sunlight needs of the future development;
  - this would allow for the maintenance of the dwelling from within the curtilage of the property;
  - this would adhere substantially to the existing patterns of buildings and features in the locality.
- b. the building heights/number of storeys increase or where the nature of the levels of the site in relation to its surroundings are such that the application of these standards would cause overlooking;

Table 3.4

	Number of storeys in facing buildings					
	1-1	1-2	1-3	2-2	2-3	3-3
Minimum distance between rear facing windows (in metres)	22	22	25	22	25	30
Minimum distance between windows and side boundaries	11m					

## 3 Housing

Flank windows will generally be resisted unless it can be demonstrated that they are necessary to achieve positive surveillance (such as the overlooking of side alleys, streets), and do not result in an adverse degree of overlooking and loss of privacy. Consideration may be given to the use of high level windows or obscured glazing, obscure view/angled windows, use of level changes, staggered windows.

The appropriate distancing between front facing windows (towards the street) will be assessed having regard to principles of urban design, including how the development addresses/relates to the street such as the need for front gardens, and the character of the proposed development and the existing street scene.

Development should demonstrate how habitable rooms within each dwelling are provided with an adequate level of privacy within the development, in relation to the street and any neighbouring properties and spaces.

*This policy links to Core Strategy policy 4.*

### Justification and guidance on implementation

- 3.4.44** Distancing between developments serves a number of purposes: it helps to maintain a sense of privacy, it is also key to avoiding overshadowing and ensuring adequate amounts of sunlight are available for new and existing developments. As an unintended benefit, the spacing between development at the rear offers the space for amenity uses. It is therefore important that a degree of distancing is achieved on all development sites, including new residential units and extensions.
- 3.4.45** The standards for new build residential accommodation set out in the draft policy above, already form part of the Unitary Development Plan (UDP) and therefore have been in operation and influential on the form of development which has taken place since at least 1994. However, these standards are not intended to be applied too rigidly as there will be circumstances where a developer may be able to justify a lesser standard or where the Council will require a greater distance, depending on the site context. The policy applies criteria to be able to assess and therefore to allow for flexibility to deviate from the standards, where this may be appropriate.
- 3.4.46** The relationship between facing windows at the rear is different from front facing windows which look out onto the street. These relationships represent distinctly different expectations of space - at the front, streets form part of the public realm, they act as spaces for public interaction/socialisation, they often have passing traffic and pedestrians, and the interface between public and private activity/functions (refuse collection/storage, deliveries) so the expectations in terms of privacy is less and they take on a much more utilitarian emphasis in terms of design, form and function. At the back, there are often associated rear gardens which provide private spaces to be enjoyed by the occupying household, a greater sensitivity is required to ensure that these spaces maintain a greater sense of privacy but also to ensure that these spaces can be enjoyed i.e. that they are well lit and not adversely affected by overshadowing.
- 3.4.47** Flank windows have the potential to create privacy issues, however blank facades also have the disadvantage of creating a lack of interest and surveillance. Therefore, these impacts need to be weighed up and, in either case, mitigation measures should be put in place (such as high level windows, obscured glazing, more elaborately designed flank facades)
- 3.4.48** Developers will be required to provide supporting material in a Design and Access Statement to justify the distancing within the development proposals.

## 3 Housing

### 3.5 Residential Extensions

#### DRAFT DMD 15

##### Rear Extensions

Single Storey Extensions should not exceed 3m in depth beyond the original rear wall in the case of terraced and semi-detached properties, or 4m for detached dwellings. In the case of a flat roof, the single storey extension should not exceed a height of 3m from ground level when measured to the eaves with an allowance of between 3.3-3.5m to the top of a parapet wall. For pitched roofs the extension should not exceed 4m when measured from the ridge and falling to no more than 3m at the eaves.

Where site conditions allow for a larger ground floor extension, the depth shall not exceed a line taken at a 45-degrees from the mid-point of the nearest original ground floor window to any of the adjacent properties; or, secure a common alignment of rear extensions.

First Floor Extensions should not exceed a line taken a 30-degrees from the mid-point of the nearest original first floor window to any of the adjacent properties; or, secure a common alignment of rear extensions.

The above criteria are not the only limiting factors regard will be given to such other determining issues as topography, orientation, siting, the visual effects and impacts on the amenities of the original building and its neighbouring properties, the retention of adequate amenity space and the maintenance of satisfactory access to existing garages or garage/parking space.

*This policy should be read in conjunction with Core Strategy policy 4.*

#### DRAFT DMD 16

##### Outbuildings

Proposals for outbuildings must comply with the following criteria:

- a. The building must be ancillary to the use as a residential dwelling;
- b. The design should have regard to topography;
- c. It should not normally come forward of the front building line;
- d. Maintain an adequate distance from the dwelling and be of a appropriate height and bulk so as not to adversely impact on the character of the local area and amenities of neighbouring properties;
- e. The size, scale and siting of the development must not have an unacceptable impact on the adjoining properties in line with relevant criteria in DRAFT DMD 12 'General Standards for New Residential Development'

*This policy should be read in conjunction with Core Strategy policy 4.*

#### DRAFT DMD 17

##### Roof Extensions

Roof extensions to residential properties will only be permitted when:

- a. They are of an appropriate size and location within the roof plane, and in the case of roof dormers are inset from the eaves, ridge and edges of the roof (insets should normally be between 500-750mm);

## 3 Housing

- b. They are in keeping with the character of the property, and are not dominant when viewed from the surrounding area;
- c. In case of roof dormers on side facing roof and hip to gable roof extensions, they do not disrupt the character or balance of the property or pair or group of properties of which the dwelling forms a part.

Roof dormers on front facing roofs will generally be resisted unless they do not materially affect the character of the area and are not dominant or intrusive when viewed from the surrounding area.

*This policy should be read in conjunction with Core Strategy policy 4.*

### DRAFT DMD 18

#### Side Extensions

Extensions to the side of existing residential properties, will only be permitted where:

- a. They do not result in the creation of a continuous facade of properties or 'terracing effect' which is out of character with the locality, having regard to the need to maintain a minimum distance of 1m from the boundary with adjoining property although a greater distance may be required depending on the size and nature of the residential plots, and to prevent adverse impacts on the streetscene and residential amenity;
- b. They maintain a distance from the back edge of the pavement on the return frontage to the flank wall. This will be assessed having regard to the following:
  - the need to maintain a direct relationship with the established building line and vista to the properties adjoining at the rear;
  - the character of the local area;
  - the bulk/dominance of the structure along the street frontage and its subordination in relation to the original dwelling;
  - the need for adequate visibility splays; and
  - the need to retain an adequate amount of amenity space.

*This policy should be read in conjunction with Core Strategy policy 4.*

#### Justification and guidance on implementation

- 3.5.1** Extensions to residential properties can be an efficient and, in difficult housing markets, more affordable and practical way of adapting to household changes. However, extensions may disrupt the established pattern and form of development and therefore may have impacts on residential amenity, through reduced distancing, the extent of overlooking, effects on daylight penetration, the intensification of development in relation to the site as a whole, and the character of the street scene. The draft policy seeks to apply a consistent set of principles to ensure that these impacts are considered and managed.
- 3.5.2** The Council would not normally expect rear extensions to exceed depths and heights stated as limits to permitted development rights set by the Town and Country Planning (General Permitted Development) Order. Given that the majority of householders would have the benefit of permitted developments rights on their properties, for those who do need to apply for planning permission, this would allow for the potential to secure a common alignment of extensions and therefore reduce the potential adverse impacts on residential amenity. However, the Council recognises that in some cases these limits will not be appropriate and therefore a lesser or greater amount may be considered having regard to the particular circumstances of the site.

## 3 Housing

- 3.5.3** When applying the 30° and 45° rule, if both adjoining properties are affected the determining issue will be the line from the worst affected property. Angled or projecting windows will receive special consideration. Where the adjoining property has a bay window, the 45 degree line is taken from the mid point of the window opening on a line level with the rear main wall. It is not taken from the bay window.
- 3.5.4** There should be no chamfering of edges to avoid the policy although a well-designed extension with a single stepped wall may be acceptable, although the length of the step should be reasonable and the design should not be dictated by the need to maximise the depth of the extension at the expense of the overall aesthetic.
- 3.5.5** Where there are existing extensions on adjacent properties built either as permitted development or with planning permission, the criteria set out in above will apply as from the original dwelling regardless of the depth of the adjoining extensions, although if an extension of greater depth is justified to secure a common alignment of rear extensions, this may be permitted.
- 3.5.6** If the rear wall of neighbouring properties is not level with the subject property due to an original stepped rear elevation, the depth of the proposed extension must not exceed 3 metres beyond the rear of the adjoining houses even if this means a depth of 3 metres cannot be achieved. However, it will not be acceptable for this to be applied if it would result in an extension which would exceed 3m in depth.
- 3.5.7** It is intended that the above guidelines should apply to all properties whether terraced, semi-detached or detached. However, it should be remembered that the application of the angles may, in the case of detached properties, and in some cases, on semi-detached properties, give credence to a suggestion that a very large extension could be acceptable. However, other limiting factors will still apply.
- 3.5.8** Outbuildings can provide space for activities ancillary to the residential dwelling such as space for a study, gym or playroom/summer house. The scale of the development will be expected to be proportional to its ancillary function, and therefore be subordinate within the site. Roof and side extensions, due to their visibility, can have a more discernible impact on the street scene. Uniformity in architectural treatments, such as roof lines, and the rhythm of building widths are important to maintaining a continuity of character across parts of Enfield. Side facing dormers, in particular, can result in awkward development forms and disrupt the balance of a row of terraced or pair of semi-detached houses, where roof treatments are mirrored.
- 3.5.9** Side extensions can, if developed right up to the side boundaries adjoining neighbouring properties, lead to a 'terracing' effect, as semi-detached or detached properties becomes attached via extensions to those adjoining properties. In certain cases, this would be out of keeping with the character of the locality and, therefore to prevent this, a clear separation between the built form needs to be maintained. As a minimum, there needs to be a 1m separation from the side boundary, however, where this would give rise to a very large extension due to the size and nature of the residential plot, a greater distance may be required. The determining factors for the degree of separation include the impacts on the street scene and residential amenity (privacy, outlook, daylight, sunlight). Developers should also consider appropriate access for ongoing maintenance purposes.
- 3.5.10** Where the property is already at the end of a row of terraces, the circumstances are different and therefore the separation distance from the back edge of the pavement is important. Corner/end of terrace properties occupy prominent places along a street frontage, maintaining a separation from the pavement on a return frontage will help to ensure that side extensions on these properties are not overly dominant.

## 3 Housing

### 3.6 Specialist Housing Needs

#### DRAFT DMD 19

##### Specialist Housing Needs

- 1) In addition to the relevant criteria in DRAFT DMD 8 'Loss of Existing Residential Units', development which would lead to a loss of specialist forms of housing will be considered against the following:
  - a. Whether it is still required to address that specialist housing need, both including its use and tenure, or
  - b. If not, whether it is required to meet any other identified housing need;
  - c. Whether the existing floorspace is satisfactorily re-provided to an equivalent (where this is appropriate) or better standard within development proposals;
- 2) Development proposals for new specialist forms of housing would only be supported where the developer demonstrates that:
  - a. the development would meet an identified local need for that form of specialist housing having regard to evidence of need in the Council's Market Statement or the needs assessment of a recognised public body such as the Primary Care or Mental Health Trust;
  - b. the property is suitable for such a use and would not result in an over intensive use of the site
  - c. That residential amenity is preserved in accordance with the relevant criteria in policy DRAFT DMD 12 'General Standards for New Residential Development';
  - d. It would not result in an excessive number or concentration of similar uses in a locality which would be detrimental to residential character or amenity;
  - e. The development is adaptable, well designed, of a high quality, accessible (internally and externally), meets the needs of the specific client groups it serves and their carers but is flexible in case these change. Developments must have regard 'General Standards for new development', other design considerations and local guidance. The Council will work with partners to ensure the facilities provide an adequate form of accommodation; and
  - f. The development is well located so that it is easily accessible to existing local community facilities, infrastructure and services, such as public transport, health services, retail centres, recreation and leisure opportunities.

Proposals which do not align with local need would not be permitted.

*This policy should be read in conjunction with Core Strategy policy 6.*

#### Justification and guidance on implementation

- 3.6.1** For the purposes of the above policy, specialist housing means housing designed to meet the needs of particular client groups, such as sheltered housing with care support and residential care homes. Policy guidance on locating gypsy/traveller accommodation is provided in Core Strategy Policy 6.
- 3.6.2** Specialist housing accommodation and associated care/support plays a key role in supporting and enhancing the quality of life of a large number of individuals and their families. Where existing specialist housing provision helps to fulfil a local need for that type of housing it needs to be maintained as such unless it can be demonstrated otherwise. This will help to maintain these essential services and ensure that we do not undermine this element of housing supply. Specialist housing operators often convert existing single family dwellinghouses for this use, but they also can be accommodated within purpose built blocks. The Council will support conversion back to family accommodation, when it can be demonstrated that the policy criteria above can be met. Where the development involves the conversion of an existing single family dwelling house, then **DRAFT DMD 9 'Residential Conversions'** will apply.

## 3 Housing

- 3.6.3** Housing is such a priority land use that if existing specialist provision is no longer required, and planning permission is required, then consideration will be given to whether the site could be used to meet other identified housing needs. If this housing is affordable, then the developer also needs to demonstrate that this tenure of specialist housing is no longer required. If this can be demonstrated the Council will consider whether affordable housing should be re-provided as part of the new development proposals.
- 3.6.4** Development proposals for new specialist housing will be supported when they are required to address local housing need and are appropriate both in terms of their location and design. The Council are developing a commissioning strategy for the development of accommodation, support and care services for vulnerable adults. This strategy will be underpinned by the principles of, and will help to manage the local implications of the Personalisation agenda. The draft Market Statement (2011) provides an analysis of local need; an indication of future accommodation needs; spatial priorities for accommodation/service provision; and design and accessibility requirements. It is intended to provide a strategic overview of Enfield's direction of travel and key priorities in relation to the strategic planning and purchasing of health and social care services.
- 3.6.5** The Market Statement indicates the need to expand the supply of specialist housing for some groups. This expansion may be met through the improvement and/or remodelling of existing service provision, or through new development. However, it also identifies an oversupply of residential care home provision for some groups in relation to local demand, and states that additional capacity in the residential care Market over the next 5 years is not required, unless it meets a need for a more specialised form of provision identified in the Market Statement (this includes specialist dementia care services).
- 3.6.6** The Statement will be reviewed annually and the emerging commissioning strategy will draw on this evidence of local needs and will outline future accommodation and service priorities, both for those services the Council will commission and potential areas of development for non commissioned services. Developers need to demonstrate how they address identified need in light of evidence presented in the Market Statement. Developers are encouraged to liaise with Health, Housing and Adult Social Care Services and Development Management teams to discuss their proposals before submitting a planning application.
- 3.6.7** Good design is fundamental to successful housing developments, irrespective of the type of housing provided. However, the design of specialist housing does need to be more tailored to the needs of its user group otherwise it may have a significant adverse impact on the quality of life of those individuals. Developers must ensure that the internal and external design of the buildings and their accessibility help facilitate independence and social integration. Given the potentially changing needs of Enfield's population, developers of specialist housing should be responsive to change and aim to provide flexible accommodation which is adaptable. Developments certainly should not design out the possibility for this to happen i.e. allowing for the potential use of innovative technology, catering for a range of care needs/client groups (considering the dual registration of facilities), facilitating joint purchasing/commissioning of care by different people within a single development.
- 3.6.8** Building to Lifetime Homes Standard and in line with Enfield's Wheelchair design guide will help to ensure that new homes incorporate design measures which support accessibility and allow adaptation to people's changing circumstances. However, it is noted that people may want be supported to live in their existing home which may not already be Lifetime Home Compliant. In future, there could be increased demand for adaptations (i.e. external access ramps, extensions) to allow for people to remain at their own homes for longer.
- 3.6.9** Specialist housing can be a more intensive form of residential development, due to the nature of services and numbers of staff associated with the facilities. If there is an excessive number or concentration of similar uses in a locality this could have adverse impacts on amenity, such as increased car parking, and noise and disturbance. The Council will consider the number and clustering of similar uses in the locality (implemented and unimplemented permissions), the need for mixed and balanced communities, and assess whether additional development would undermine the residential character having regard to the following:

## 3 Housing

- If the layout of dwellings and their gardens are so designed that further on-street parking or the use of front gardens for parking purposes would have a particularly adverse effect on the quality of the street scene;
- If there are dwellings which have a particular architectural uniformity or style which could only be effectively retained if the dwellings remained in single family occupation;
- the existing juxtaposition of dwellings and the potential for a conversion to exacerbate issues with noise and disturbance;

**3.6.10** Appendix 2 of the Market Statement includes maps of the current supply/location of accommodation. The Council will use this and other evidence to assess the number and clustering of uses, and the need for that particular form of accommodation and location.

**3.6.11** Developers will be required to provide information on the staffing requirements and visitors (number of staff, staff working hours, visiting hours, and number of visiting care professionals) so that an assessment can be made of any additional potential impacts.

## 3 Housing

# Community Facilities

## 4 Community Facilities

# 4 Community Facilities

### 4.1 Community Facilities

- 4.1.1** To achieve the Council's commitment to making Enfield a healthy, prosperous and cohesive community there must be accessible local services that reflect community needs and support well-being.
- 4.1.2** The Council will plan positively for the provision and integration of community facilities and other local services to enhance the sustainability of communities and residential environments, particularly recognising the importance of community facilities to the success of new developments in strategic growth areas.
- 4.1.3** Community facilities are those facilities which reflect local community needs, facilitate social interaction, and promote inclusive communities. In some communities this may include valued local shops and public houses. Examples of community facilities include:
- Recreation, leisure, culture and arts facilities
  - Libraries
  - Outdoor and indoor sports facilities.
  - Schools and other educational and training institutions
  - Day nurseries
  - Health facilities
  - Day centres vulnerable adults and carers
  - Community halls and centres
  - Places of Worship
  - Emergency service and policing facilities
- 4.1.4** The Core Strategy addresses community facilities through a number of core policies including: Core Policy 7: Health and social care facilities and the wider determinants of health, Core Policy 8: Education; Core Policy 10: Emergency services; Core Policy 11: Recreation, culture, leisure and arts; and Core Policy 34: Parks, playing fields and other open spaces.

#### DRAFT DMD 20

##### Provision of New Community Facilities

The Council will plan positively for the delivery of community facilities to meet local needs such as leisure facilities, schools and hospitals, along with supporting access to open spaces and recreational facilities that promote the health and well-being of the community.

New community facilities will be supported borough-wide and will be required as part of the development of strategic sites within the strategic growth areas to ensure the creation of prosperous, sustainable communities. Planning permission will be granted provided the proposed development:

- Is demonstrated to have a community need;
- Makes an efficient and effective use of land and buildings, and where appropriate, provides opportunities for co-location, flexible spaces and multi-use;
- Is easily accessible to the community it is intended to serve by walking, cycling and public transport to reduce dependence upon private car transport;
- Development should be located in local centres and town centres or edge of centres as appropriate depending on the scale of development in accordance with DRAFT DMD 29 'New Retail and Leisure Development'.

## 4 Community Facilities

- Is designed to provide access for physically impaired users, in accordance with DRAFT DMD 1 'Achieving High Quality and Design-Led Development';
- Does not result in disturbance to the amenity of neighbouring and nearby properties and sites in terms of the scale of the proposal, and potential negative impacts such as noise, odour and lighting;
- Does not result in a detrimental visual impact to the character of the area;
- Does not have a negative impact on the area in terms of the potential traffic generated.

This policy should be read in conjunction with Core Policy 7: Health and social care facilities and the wider determinants of health, Core Policy 8: Education; and Core Policy 11: Recreation, culture, leisure and arts.

### Justification and guidance on implementation

- 4.1.5** The provision of accessible and suitable social and community facilities is vital to support sustainable communities. The Council has a responsibility to encourage the development of suitable new community facilities and protect existing facilities. The Council will seek to support community groups through the planning process.
- 4.1.6** In August 2011 Central Government published a policy statement setting out a presumption in favour of development for state-funded schools. In line with this policy applications for state funded schools applications will be supported subject to compliance with other development plan policies.
- 4.1.7** Proposals for community facilities will need to be supported by evidence relating to:
- The community need for the proposal;
  - An examination of the potential for dual uses/co-location, including the uses being catered for, the potential benefits, security issues and costs;
  - Internal floor space arrangements;
  - Days and hours of operation;
  - Accessibility by public transport;
  - Likely dependence on private car transport and car parking provision;
  - Vehicular access and manoeuvring arrangements.

### DRAFT DMD 21

#### Protection of Community Facilities

The Council will protect existing community facilities in the borough.

Proposals involving the loss of community facilities will not be permitted unless:

- a suitable replacement facility is provided to cater for the local community that maintains the same level of public provision and accessibility; or
- evidence is submitted to demonstrate that there is no demand for the existing use or any alternative community use.

This policy should be read in conjunction with Core Policy 7: Health and social care facilities and the wider determinants of health, Core Policy 11: Recreation, culture, leisure and arts; and Core Policy 34: Parks, playing fields and other open spaces.

## 4 Community Facilities

### Justification and guidance on implementation

- 4.1.8** There are a limited number of suitably located sites that can accommodate community uses in the borough, and consequently existing social and community facilities should be protected. This is particularly important when social and community facilities are in locations that have more profitable alternative uses, for example residential uses.
- 4.1.9** The demand for a social and community facility may change over time as the nature and needs of a local community change. However, any application to change the use away from that of a community facility must be undertaken with caution.
- 4.1.10** Community facilities should be safeguarded against the unnecessary loss of facilities and services, particularly where this would reduce the community's ability to meet its day to day needs.
- 4.1.11** Community facilities typically fall under use class D1 (non-residential institutions) or D2 (assembly and leisure). Permitted development rights allow changes within a use class without the need to apply for planning permission. Council planning policy can protect premises from changes between use classes, and the Council will seek to protect existing essential community-use assets from a change to non-community use assets, unless:
- The applicant can demonstrate functional redundancy of the site/ building, with no current or likely future demand or use as a community use;
  - Appropriate marketing evidence is presented to the Council which demonstrates that there is no realistic demand;
  - Marketing evidence has been appropriately advertised to the local population and the community consulted before any change in use can be consented.

## 4.2 Day Nurseries

### DRAFT DMD 22

#### Day Nurseries

Proposals for day nurseries will be encouraged to use community facilities either through the co-location of the day nursery with other community uses, or through the reuse of existing community facilities that are not currently in use. A day nursery proposal should demonstrate that community facility options have been assessed before a change in use of residential units will be considered. Proposals involving a change from residential use will be considered as follows:

1. Proposals involving new day nurseries within existing terraced or flatted developments will not generally be permitted as the proposal is likely to result in noise and disturbance to a residential area from traffic movements and on street parking. However, it is recognised that for new purpose-build developments, particularly in Enfield's strategic development areas, day nurseries integrated within a residential building could provide an appropriate use provided appropriate measures are taken with regard to the amenity of neighbouring properties.
2. Proposals involving new day nurseries within detached houses with sufficient garden and curtilage for off street parking will be permitted subject to it being demonstrated that noise and disturbance is limited and access, parking and servicing managed as appropriate.
3. Proposals involving new day nurseries within semi detached houses may be acceptable if they are modest in scale, are confined to the ground floor and have limited impact on the amenity of the adjoining property.
4. The net loss of residential accommodation or site capable of residential accommodation may be allowable in accordance with DMD 8: Loss of Existing Residential Units.

## 4 Community Facilities

### Justification and guidance on implementation

- 4.2.1** A day nursery provides day care and education for pre-school age children. This includes early years provision such as crèches, playgroups, playschools and work place crèches. Child minding proposals do not normally require planning permission, typically operating in a house that is primarily a residence.
- 4.2.2** Day nurseries are Use Class D1: non-residential institutions. While nurseries are often provided in community and church halls, they are increasingly run on a commercial basis, often through the conversion and expansion of existing residential properties.
- 4.2.3** Day nurseries bring benefits to the community by reducing barriers to working for parents and carers and can provide an environment conducive to the development of the children who attend. However, nurseries must be provided in appropriate locations and suitable premises to ensure high standards of provision which do not cause harm to the amenity of neighbours.
- 4.2.4** Day nurseries can be operated by individuals, private companies, voluntary organisations or the Council. In Enfield the demand and supply of childcare places and any gaps in provision are identified in the 2011 Childcare Sufficiency Assessment. The CSA states that the supply and demand for childcare places is higher in the least deprived parts of the Borough. The main gaps in provision are in the more deprived parts of the Borough where there is a need for more affordable childcare places. The CSA is reviewed every 3 years.
- 4.2.5** The London Plan seeks to increase the number of childcare places per 1,000 for under fives, with an emphasis in Areas of Regeneration. The availability and lack of affordable childcare are identified as barriers to the labour market. Investment in the expansion and improvement of affordable childcare is therefore encouraged.
- 4.2.6** Planning applications for proposals involving day nurseries should be supported by appropriate evidence relating to the following:
- The number and age ranges of children being catered for;
  - Days and hours of operation, including times for use of the garden;
  - Internal floor space arrangements;
  - Soft and hard external play space provision;
  - Car parking provision;
  - Vehicular access and manoeuvring arrangements;
  - Boundary treatments and screening.
- 4.2.7** The days and hours of operation for a proposal will be agreed on a case by case basis.

## 4 Community Facilities

# Enfield's Economy

## 5 Enfield's Economy

# 5 Enfield's Economy

## 5.1 Introduction

- 5.1.1** This section of the Development Management Document provides support for different business sectors to facilitate sustainable economic growth. Based on evidence of demand and supply (Employment Land Studies 2006, 2009 and 2012).
- 5.1.2** Core Policies 14 and 15 identified a list of industrial areas safeguarded as Strategic Industrial Locations (SIL) and Locally Significant Industrial Sites (LSISs) to be protected for non-industrial uses. The extent of these designations are shown on the Policies Map.

### Employment Land Review

The supply of industrial/warehousing land in North London is limited and there is a need to retain industrial capacity to accommodate existing and future demand. A review of supply and demand in the Council's Employment Land Review (2012) concludes that even in the context of the current economic climate, Enfield should protect its employment sites.

The 2012 Review identified low vacancy rates and recommended that Enfield should not see any net reduction in the employment land stock. On the basis of these recommendations, no changes are recommended to the SIL and LSIS Policies Map designations at this time. Changes to individual sites will be considered through the Area Action Plan process.

## 5.2 Strategic Industrial Location (SIL)

### DRAFT DMD 23

#### Appropriate Uses in Strategic Industrial Locations

##### 1. Preferred Industrial Location (PIL)

Proposals involving general industrial, light industrial, storage and distribution, waste management, recycling, some transport related functions, utilities and other industrial related activities, including green industries and management of waste within PILs will be permitted if it meets DRAFT DMD 26 'New Employment Development'

Proposals involving the loss of industrial capacity in PILs will be refused.

##### 2. Great Cambridge Road

Proposals for industrial activities that require a better quality surrounding, including research and development, light industrial and small scale distribution will be permitted within the Great Cambridge Road Industrial Business Park (IBP).

A change of use from industrial uses in the Great Cambridge Road Industrial Business Park will be refused, unless all of the following criteria are met:

- a. The proposed use would not compromise the primary function and status of the IBP for industrial uses, the operating conditions of the other remaining industrial uses or the potential future use of neighbouring sites for appropriate industrial uses;
- b. The proposed use does not have a significant adverse impact on surrounding residents in terms of pollution, noise and traffic;

## 5 Enfield's Economy

- c. There is no significant net loss of industrial capacity;
- d. The proposed use generates significant additional employment; and
- e. The proposed development makes a significant contribution to the public realm

Quasi retail uses such as car show rooms, hotel and conferencing facilities may be permitted on the main road frontages and gateways of the Great Cambridge Road IBP, which have good access to a range of transport options provided that there is no adverse impact to highway safety and do not prejudice the efficient and effective use of the remainder of the industrial area.

With regards to proposals for car showrooms, these may be permitted provided there is an associated vehicle servicing/repair activity in conjunction with the showroom.

*This policy should be read in conjunction with Core Strategy policies 13 and 14.*

### Justification and guidance on implementation

- 5.2.1** The main focus within SILs is on uses categorised under the "B" use classes (B1, B2 and B8). The Council recognises that there are a greater number of uses of a similar nature that can also locate and function successfully within these industrial areas.
- 5.2.2** The PILs and IBP make up the strategic reservoir for industrial capacity in North London. PILs are designated for industrial uses that do not require a high quality environment - such uses may require heavy goods access by road, rail and/or water, need to operate outside normal business hours and require sufficient distance or other barriers from noise and sensitive uses. IBPs meet the business needs of enterprises that need a better quality industrial surrounding including B1(b), B1(c) and higher value added B2 activities. Within the Great Cambridge Road IBP area clusters of offices, industrial and warehousing uses exist along the main road, as well as a range of other uses including out of centre retail stores and sui generis use such as car showrooms.
- 5.2.3** There are some instances where there are quasi-retail uses located in industrial areas, such as car showrooms, tyre and exhaust centres, builders merchants and similar uses that are unsuitable in town centre locations due to their scale and characteristics. These uses have traditionally located in industrial areas, which often causes conflict between heavy goods vehicles and general traffic. In this respect, the Council considers that these uses would therefore be more appropriately located on the main road frontages of existing industrial areas.

### 5.3 Locally Significant Industrial Sites (LSIS)

#### DRAFT DMD 24

#### Appropriate Uses in Locally Significant Industrial Sites

In line with Core Policy 15: Locally Significant Industrial Sites, proposals involving the loss of industrial uses within LSIS will be refused, unless it can be demonstrated that the development site is no longer suitable and viable for its existing or alternative business use in the short, medium and long term and supporting information covering the requirements set out in Section 5.7 'Box 3: Demonstrating that there is no current or likely demand for the site, building or premises for employment purposes' is provided.

Where the above can be demonstrated, a change of use involving a loss of industrial uses will only be considered if all of the following criteria is met:

- a. The proposed use would not compromise the primary function of the LSIS, the operating conditions of other remaining industrial uses or the potential future use of neighbouring sites for industrial uses;

## 5 Enfield's Economy

- b. The development provides for a mix of uses including a significant element of business/industrial uses or other employment generating uses;
- c. The development would contribute to the implementation of an approved regeneration strategy or plan of the area, where appropriate; and
- d. The proposed use is well designed and compatible to its surroundings;

In exceptional circumstances, where a significant element of business/industrial uses or other employment generating uses cannot be provided within the development, applications for the loss of industrial land will be expected to provide mitigation in accordance with the Council's SPD on Planning Obligations.

Where redevelopment of industrial land or premises is accepted for a new employment use or alternative use, particular consideration will be given towards ensuring the future viability of individual businesses that might be displaced. The onus is on the developer to find alternative accommodation for any displaced businesses. Planning contributions towards alternative employment, regeneration and training schemes will be sought where sites are redeveloped and alternative employment premises are not provided.

*This policy should be read in conjunction with Core Strategy policies 13 and 15.*

### Justification and guidance on implementation

- 5.3.1** The SIL framework establishes a hierarchy and it is considered important to retain industrial capacity in strategic and locally significant locations. The Employment Land Review (ELR) (2012) confirms that the amount of industrial capacity identified for protection is considered appropriate to meet demand. Any significant release should be part of a strategically coordinated process of industrial land and consolidation.
- 5.3.2** Outside of the SIL hierarchy a number of smaller but locally significant sites often located within residential areas or in proximity to town centres have been identified in Core Strategy Policy 15 as Locally Significant Industrial Sites (LSIS ). These fulfil an important role in terms of local employment and business opportunities. The Mayor's SPG on Industrial Capacity (2008) indicates that sites identified as LSIS will be afforded the same level of protection as SIL (PIL and IBP), and the Mayor will provide strategic support for boroughs to resist their development for non-industrial uses.
- 5.3.3** Significant net loss of industrial capacity is the net loss of floorspace, land (ha) and jobs, which would harm the integrity of a site for its industrial uses.

## 5.4 Complementary and Supporting Uses within SIL and LSIS

### DRAFT DMD 25

#### 1. Complementary and Supporting Uses within SIL and LSIS

Small scale walk-to services providing for the essential day to day needs of the industrial occupiers such as workplace crèche or café will generally be permitted, provided that the proposed use is necessary to support industrial activity and it would not adversely affect the industrial status or operation of the area.

#### 2. Direct Sales or Trade Counters within SIL and LSIS

The Council recognises the changing nature of industrial/business activities and that many uses within industrial areas include an element of direct sales. Proposals involving an element of direct sales will generally be accepted, provided that all of the following criteria are met:

- a. The retail element does not become the dominant use and is no more than 10% of the overall floorspace; and
- b. The retail element is on the ground floor.

## 5 Enfield's Economy

*This policy should be read in conjunction with Core Strategy policies 13, 14 and 15.*

### Justification and guidance on implementation

- 5.4.1** The Council recognises the changing nature of industrial/business activities and accepts that in some instances that many uses in industrial areas include an element of direct sales in terms of trade counters being ancillary to the main use of industrial areas. These uses are considered acceptable provided that the retail element does not become the predominant use. Therefore where the proposal includes an element of retail use to the public and is a significant part of the activity, proposals will be resisted. However, other uses which assist in the functioning of the industrial area that are considered to be ancillary uses, such as a small scale shop/cafe/creche aimed at serving the needs of the workers may be accepted.

## 5.5 New Employment Development

### DRAFT DMD 26

#### New Employment Development

##### 1. Industrial development within SIL and LSIS

Proposals for industrial development within SIL and/or LSIS will be expected to contribute to, where appropriate to any improvement schemes for that industrial location, as well as achieve environmental and traffic improvements.

Proposals involving industrial uses must:

- a. Ensure there is no adverse impact as a result of noise and disturbance, appearance and access, parking and servicing problems in the area;
- b. Provide accommodation that is flexible and suitable to meet future needs especially to provide for the requirements of local businesses and small firms, where appropriate;
- c. Ensure the scale, bulk and appearance should be compatible with the character of its surroundings;
- d. Provide on-site servicing for the intended use and include space for waiting for goods vehicles; and
- e. Designed in accordance with the requirements set out in DRAFT DMD 3 'Sustainable Design and Construction Statements' and the chapter on the Built Environment.

##### 2. Industrial Development Outside Designated Industrial Areas

Proposals for new industrial/warehousing and related development will be directed to the borough's "Preferred Industrial Locations (PIL)", "Industrial Business Park (IBP), Locally Significant Industrial Sites (LSIS)".

An assessment against all of the following criteria will be made for proposals outside these locations:

- a. The use is compatible with the existing uses in the surrounding area and there is no adverse impact on those areas;
- b. Ensure the surrounding industrial locations are not undermined;
- c. There is no adverse impact on the capacity of the road network;
- d. The development provides adequate on-site parking and servicing for its intended use, including space for waiting for goods vehicles; and
- e. Must be designed in accordance with the requirements set out in DRAFT DMD 3 'Sustainable Design and Construction Statements' and the chapter on the Built Environment.

##### 3. New Office Space

Proposals for new office space will be assessed against the following criteria:

## 5 Enfield's Economy

- a. The use must be compatible with existing uses in the surrounding area ; and
- b. There must be no adverse impact on the capacity of the road network;

Proposals for new office space will be expected to provide on-site servicing for the intended use and include space for waiting for goods vehicles and designed in accordance with the requirements set out in DRAFT DMD 48 'Access and Servicing'.

*This policy should be read in conjunction with Core Strategy policies 13, 14, 15 and 19.*

### Justification and guidance on implementation

- 5.5.1** The need for redevelopment and renewal of industrial locations across the borough to meet the demands of businesses requires that new development is directed to the existing industrial locations in the first instance.
- 5.5.2** The demand for industrial floorspace is expected to continue. The Council will direct new development to SIL and LSIS identified on the Policies Map. Existing industrial locations including SILs and LSISs provide a reservoir of industrial capacity and can be strengthened by directing new industrial and warehousing development to these locations, thereby enhancing their offer.

## 5.6 Preventing the Loss of Industrial and Employment Capacity

### DRAFT DMD 27

#### Loss of Industrial and Employment Capacity Outside Designated SIL and LSIS

##### 1. Preventing the loss of industrial and related uses

Proposals involving the change of use that would result in a loss or reduction of industrial and employment capacity outside of Preferred Industrial Locations (PIL), Industrial Business Park (IBP), or Locally Significant Industrial Site (LSIS) will be refused, unless it can be demonstrated that the site is no longer suitable and viable for its continued industrial and related uses. In assessing whether the building and location is suitable, supporting information covering the requirements set out in section 5.7: 'Box 3: Demonstrating that there is no current or likely demand for the site, building or premises for employment purposes' of this document should be provided.

Where the above can be demonstrated, a change of use will be permitted, provided that all of the following criteria can be met:

- a. The proposed use would not compromise the operating conditions for other employment uses or the potential future use of neighbouring sites for employment uses;
- b. The proposed development incorporates employment generating uses or
- c. Mitigation for the loss of employment uses is provided in accordance with the Council's SPD on Planning Obligations.

##### 2. Preventing the loss of office floorspace

The Council will encourage intensification, renewal and modernisation of existing business floorspace, including the reuse of surplus large office spaces for smaller units, adaptation to accommodate hot desking or managed workspace. Proposals involving the change of use that would result in a loss or reduction of office floorspace within Enfield Town and Southgate town centres will be refused, unless it can be demonstrated that the site is no longer suitable and viable for its continued office use. To assess whether the building and location is suitable, supporting information covering the requirements set out in section 5.7 'Box 3: Demonstrating that there is no current or likely demand for the site, building or premises for employment purposes' of this document must be provided.

## 5 Enfield's Economy

Where the above can be demonstrated, a change of use will be permitted, provided that all of the following criteria can be met:

- a. The development comprises a mix of complementary uses, including active frontages where appropriate; and
- b. The development provides for the re-provision of the maximum amount of business floorspace reasonably possible on site, whilst complying with other relevant planning considerations;

In exceptional circumstances, where business floorspace cannot be accommodated as part of the development, mitigation for the loss of employment uses must be provided in accordance with the Council's SPD on Planning Obligations.

*This policy should be read in conjunction with Core Strategy policy 13, 14, 15 and 19.*

### Justification and guidance on implementation

- 5.6.1** In achieving sustainable communities and accommodating future growth, the Council will seek to ensure there is sufficient capacity for industrial and employment developments. Employment capacity is defined as land and floorspace to accommodate businesses and therefore jobs. There are a significant number of industrial and employment generating sites and standalone employment uses within the borough outside of designated areas which provide an important source of employment and contribute to the borough's industrial capacity. The approach set out in this policy seeks to retain employment uses which remain a viable element of the borough's portfolio supply of employment land and floorspace. It seeks to ensure that sites that are released to other uses are genuinely redundant for industrial use and where an alternative is considered more suitable in planning terms. The suitability of the application site for continued employment use will be assessed having regard to other policies within this document, in particular the policy on 'considerations for new employment development'.
- 5.6.2** For industrial sites outside designated industrial locations, the Mayor suggests an approach to releasing land that is neither restrictive nor permissive, but instead takes account of local differences in supply and demand of industrial sites.
- 5.6.3** The contribution of the existing use to industrial supply and economic diversity is also a consideration. A site's contribution to the borough's industrial supply and local economic diversity may lie in its ability to provide accommodation for various types of industrial uses such as: lower-cost affordable industrial units for small businesses, start-up firms, lower-value industrial uses or other businesses important to the local economy.

### 5.7 Market Demand and Viability Assessments

- 5.7.1** As described in the 2012 Employment Land Review, there will be ongoing gross demands for employment land and premises, and there is also likely to be a decline in the demand for particular employment uses that will enable certain sites and premises to be redeveloped for other purposes. In this regard Draft DM Policies seek to determine whether there will be any ongoing interest in a particular site or premises for continuing employment uses, and as such whether it remains a viable element of the borough's overall supply of employment land or floorspace.
- 5.7.2** The responsibility is on the applicant/developer of the proposals in question to "clearly demonstrate" a lack of current or likely future demand. In order to do this, applicants will be required to provide a detailed appraisal of the site/premises in question. In order to demonstrate that there is no current or likely future demand for a particular site, building or premises, a supporting statement should be accompanied with the planning application of the proposed scheme. The statement should be prepared by a suitably qualified person with knowledge of the employment market in the local area.

## 5 Enfield's Economy

### **Box 3: Demonstrating that there is no current or likely demand for the site, building or premises for employment purposes**

#### **Qualitative appraisal**

The Appraisal should assess the physical and policy context for the site, building or premises with regard to the wider established industrial or employment area within which it is situated.

The appraisal must include an analysis identifying the advantages and limitations of the site, building or premises in question to accommodate employment uses. For each limitation that is identified, a justification should be provided as to why it could not be overcome having regard to the introduction of alternative employment uses, general investment or improvements, or through competitive rental levels.

In addition, the appraisal must include, but are not limited to, the following analysis:

- a. The relevant national, regional and local planning and economic policy context;
- b. The quality of the buildings;
- c. The accessibility of the site and its ability to serve a range of employment uses having regard to private and public transport; and
- d. Any constraints that will limit the future use of site, building or premises for employment uses.

Comparison should be made with other employment sites or areas within the locality illustrating issues that are relevant to the site, building or premises.

#### **Market Demand Appraisals**

A detailed assessment of the current, and potential future, market demand for the site, building or premises in question should be provided within the market appraisal. The analysis should reflect on the current economic trends, forecasts and actual attempts to market the site, building or premises in question.

Marketing attempts should be specific to the site, building or premises in question and should demonstrate the approach is flexible. Marketing attempts should include, but are not limited to, the following:

- a. The sub-division or joining up of the site, building or premises;
- b. Consideration of other uses for vacant offices such as: hot-desking, managed workspace, other employment generating activities;
- c. Revised servicing arrangements;
- d. Refurbishment opportunities for the current uses;
- e. Complete redevelopment opportunities for non employment uses; and
- f. Both freehold and leasehold terms offered should be attractive to the market:
  - At least three years, with longer terms, up to five years or longer, if the occupier needs to undertake repair works or major refurbishment to be fit for purpose; and/or
  - Short term flexible leases for smaller units which are appropriate for SMEs

The appraisal should demonstrate that the site, building or premises has been widely advertised for sale and rent at the market price.

For LSIS, the Council will require the site, building or premises to be continuously marketed for at least 24 months.

For non designated sites and town centre premises, the Council will require the site, building or premises to be marketed for a period of at least 12 months.

Marketing campaigns should be continuous:

## 5 Enfield's Economy

- From when the letting board is erected and the property is advertised online on reputable websites - not simply from when the agents were appointed; and
- A longer period may be needed if the market is slow or the site, building or premises is part of a larger industrial area.

In advance of advertising the site, building or premises the marketing approach should be agreed in advance with the Council.

The appraisal must include, but is not limited to, the following:

- a. Outline the marketing approach adopted for the proposed scheme and the reasoning behind it;
- b. Be able to demonstrate that all offers received have been given due consideration;
- c. Provide details in respect of why individual offers have not been taken forward;
- d. Include evidence that the site or the premises has been:
  - Continuously advertised by a reputable local or national agency who can demonstrate a track record of letting industrial space; and
  - There should be a visible letting board on the property; and
  - Advertised with rents that are reasonable reflecting market conditions and the condition of the property; and
  - Continuously advertised on the agent's website within the agent's up to date commercial stock availability list including online property databases such as Focus and EGI ; and
  - Circulated to other local property agents

### **Viability Appraisals**

The viability appraisal must provide a clear explanation of the potential to redevelop/reuse the site/premises in question for a range of employment uses having regard to the site and its context.

The appraisal must consider a range of potential alternatives for the proposed site/premises in question, including:

- a. The re-use, refurbishment, partial or complete redevelopment of the site/building for the current and alternative employment uses; and
- b. The sub-division or joining up of plots/sites; and
- c. Revised servicing arrangements; and
- d. Details of the following matters and their impact on its viability:
  - The value of the site/premises both in terms of leasehold and freehold at prevailing market rates;
  - Development costs;
  - Any abnormal costs; and
  - Any available grants

Costs and values must be set at prevailing market rates at the time of submission of the planning application. However, to take account of changing economic circumstances consideration should be given to any likely changes in market conditions within a 3-5 year time horizon, which could impact on development viability. In particular during challenging economic periods, at which time sensitivity testing should be undertaken to consider the likely costs/values if market conditions were to return to more average conditions experienced over the economic cycle.

Comparison with other similar employment schemes in the local economic area should be considered to justify the site-specific issues that set the proposed site/premises in question apart from the general supply.

## 5 Enfield's Economy

- 5.7.3** The appraisal should provide evidence-based conclusions having regard to the reasons why demand for employment purposes has not been met, and is unlikely to be met in the future. Applicants are encouraged to discuss their proposals in this regard with the Council at the earliest opportunity.
- 5.7.4** In terms of facilitating regeneration, different initiatives and strategies will be advanced in different areas of the borough according to need and opportunity. These strategies may take the form of a Local Development Document, masterplan, or regeneration strategy/framework, which has been formally approved by the Council.
- 5.7.5** These strategies play an important role in managing change across the borough, including the supply of employment land. For example, through these strategies, the Council has identified specific employment areas that are currently well occupied, informed by the Employment Land Studies and other assessments – helping to provide more certainty and plan for the relocation of any remaining businesses where appropriate. The need to facilitate regeneration may require the redevelopment of some existing employment sites in order to deliver a coordinated enhancement of the area. The Council's Regeneration team will be able to provide further information in respect of the status of individual regeneration strategies.

### 5.8 Small Businesses

- 5.8.1** Small businesses play an important role in Enfield and contribute towards a diverse economy, with many small businesses owned by traditionally marginalised groups including women and ethnic minorities. Small and medium enterprises are officially defined as businesses employing less than 249 staff and includes for example the self employed and those using their home for business purposes.

#### DRAFT DMD 28

##### Small Businesses

Proposals involving the loss of small business units (units of less than 50 sq m) suitable for start-ups and small businesses will be refused.

The provision of small business units will be sought as part of proposals for the redevelopment of an existing employment-generating site and as part of mixed use schemes, in appropriate locations.

Subject to the above, proposals for small business premises will be considered favourably and will be permitted provided that the following criteria are met:

- a. The accommodation is flexible and suitable to meet future needs especially to provide for the requirements of local businesses and small firms; and
- b. The scale, bulk and appearance of the proposal is compatible with the character of its surrounding area and compatible with the level of existing or potential transport accessibility, and does not unacceptably add to traffic and parking problems in the surrounding area; and
- c. The proposed use should comply with the Council's transport, access, servicing, car and cycle parking standards and policies; and
- d. Designed in accordance with the requirements set out in DRAFT DMD 3 'Sustainable Design and Construction Statements' and policies in the chapter on the Built Environment.

*This policy should be read in conjunction with Core Strategy policies 13, 14 and 15.*

#### Justification and guidance on implementation

- 5.8.2** The London Plan and the Core Strategy require the provision of flexible employment space for small enterprises within the borough's economy. SMEs have a crucial role to play in maximising employment opportunities in the borough. Over 90% of businesses in Enfield employ less than 20 staff. In particular, the 2010 Update to the ELS concluded that there is a strong demand for smaller, flexible, short-term employment land and premises, especially from new businesses starting up. It is therefore essential to

## 5 Enfield's Economy

ensure there is sufficient space within the borough that is flexible enough to accommodate and facilitate the growth of such businesses. Therefore the Council will consider proposals for small businesses favourably as part of redevelopment schemes in appropriate locations.

- 5.8.3** As a result of changing work patterns and innovations in Information Technology is increasingly popular for people to run part-time or full-time businesses from homes or serviced offices. The Council supports these new ways of working such as home working or serviced office accommodation providing that it meets the criteria above so that no unacceptable harm results to the local amenity or environment. In many cases working from home will not contribute to a material change of use requiring planning permission. These working arrangements help to contribute to achieving sustainability objectives particularly in terms of reducing the need to travel.
- 5.8.4** The borough's economy will continue to become more diversified despite the presence of some major companies. The continued support for the development of start-up and small businesses is important in sustaining economic growth. Maintaining and promoting diversity is also important in respect of avoiding over-reliance on any one sector. The Council considers that this DM Policy is flexible enough to accommodate structural and market changes in the economy, whilst seeking to retain diversity in employment thus providing a range of opportunities for local people.

## 5 Enfield's Economy

# Town Centres and Shopping

## 6 Town Centres and Shopping

### 6 Town Centres and Shopping

#### Enfield's Town Centre Hierarchy

- 6.0.1** NPPF seeks to promote the vitality and viability of town centres and other centres as important places for communities. Its focus is on growth and development in existing centres by securing a range of services in an attractive environment and remedy deficiencies in provision. NPPF advocates a sequential approach requiring sites within town centres to be explored first where suitable sites or buildings for conversion are available, followed by edge-of-centre sites, or those well served by a choice of public transport. The Core Strategy adopts a town centre first approach by guiding shops, leisure and similar trip-generating uses to town centres.
- 6.0.2** Appropriate town centre uses are defined as : retail, leisure, entertainment facilities, more intensive sport and recreation uses, offices and arts, culture and tourism development. An example of a more intensive sport and recreation use could be a health and fitness centre or cinema. These are uses which will be more acceptable when located in the town centre because of the transport impacts associated with their use. They also help to contribute to the continued success of the rest of the town centre.
- 6.0.3** Mary Portas, TV retail guru, was asked by Central Government to undertake an independent review into the state of Britain's high streets and town centres as concern has been expressed about decline in a number of areas. The report, published in December 2011, confirms that statistics show that total consumer spend away from the high street is now over 50%, and town centre vacancy rates have doubled in the last 2 years. This can be attributed to, amongst others, the rise of online retail, increased supermarket product offer, out of town shopping malls and the recession.
- 6.0.4** Clearly if the Government implements all, or a significant amount, of the recommendations within the Portas' Report there will be significant implications for Enfield's town centres.
- 6.0.5** The Core Strategy sets out the hierarchy of town centres within the borough these are identified on the Policies Map as: Enfield Town as the major centre, the four district centres of: Angel Edmonton, Edmonton Green, Southgate and Palmers Green; Large Local Centres, Local Centres and Local Shopping Parades. It adopts a town centre first approach, which aims to maintain the existing retail economy and services by directing major retail and leisure development in existing town centres, and promoting independent retailers to local shopping centres. Retail (A1) uses are considered to form the core use underpinning the town centre's viability and vitality. At the same time, appropriate levels of other uses such as culture, leisure and restaurants also support town centre activity and health, particularly outside shopping hours. The primary role of retail uses will be maintained in the primary shopping areas of each of the town centres in the first instance.
- 6.0.6** This chapter sets out the different approach to development management based on the town centre hierarchy. The word "Retail" should be referred to as A1 use class of the Use Class Order. This policy applies to the ground floor, i.e. the street frontage part of a unit and does not refer to basement level development or development of the first floor and above.

#### 6.1 New Retail and Leisure Development

##### DRAFT DMD 29

##### New Retail and Leisure Development

1. In accordance with Core Policy 17 the Council will apply a sequential approach for assessing applications for new retail and leisure development:

a. New retail development for main and bulk convenience goods, comparison goods, and major leisure development will be permitted within Enfield Town and the four district centres as defined on the Policies map.

## 6 Town Centres and Shopping

b. If no sites are suitable or available within the town centres listed in part a. of this policy, development at edge of centre locations that are well connected to and within easy walking distance (up to 300 metres) of the primary shopping area will be permitted.

c. New retail and leisure development within the Council's retail parks: Enfield retail park, De Manderville Gate, Ravenside and Angel Road as detailed in the Core Strategy is defined on the Policies Map will only be permitted if the applicant can demonstrate to the Council's satisfaction that a sequential approach has been undertaken which shows that there are no alternative locations available within or on the edge of the town centres detailed in part a. of this policy and a retail impact assessment demonstrates that there is no harm caused to the vitality and viability of the borough's town centres.

d. New leisure development in Picketts Lock will be permitted if a sequential approach has been undertaken to demonstrate that this is the most appropriate location for the proposed use, and where this does not conflict with other policies in Enfield's Planning Framework.

e. Development outside of the locations listed above will not be permitted.

2. Proposals for new retail (A1), A2-5 uses inclusive, leisure and other community uses of a scale which provide local shopping facilities and services for communities will be permitted within the boundaries of local centres (large local centres, small local centres and local parades) as defined on the Policies Map.

3. Subject to compliance to the above locational criteria, proposals for new or enhancement of retail and/or other town centre uses will be permitted provided that all of the following criteria are met:

- a. The proposed use supports town centre vitality and viability;
- b. The siting of the proposed use and pedestrian access to it encourages access to and from the existing town centre;
- c. The design and siting of the development promotes visual continuity with the existing street scene;
- d. Provision for improved pedestrian links are made between the proposed use and existing facilities;
- e. The proposed use does not harm the character, appearance, and amenity of the area;
- f. The residential amenities of local residents will not be harmed by way of noise, disturbance, loss of day light or privacy;
- g. The proposal will not have an adverse impact on safety and traffic flows or unacceptably add to traffic and parking problems in the area;
- h. The scale of parking is proportionate to the size of the development;
- i. The site layout gives efficient access for all modes of transport;
- j. An active frontage is achieved at the ground floor; and

If planning permission is granted, conditions may be used to:

- Prevent amalgamation of small units to create large out of centre units ;
- Limit internal alterations by specifying the maximum floorspace permitted;
- Manage the type of goods sold or type of use or activity.

*This policy should be read in conjunction with Core Strategy policies 17 and 18.*

### Justification and Guidance on Implementation

**6.1.1** The proposal builds upon Core Policy 17.

## 6 Town Centres and Shopping

- 6.1.2** A retail impact assessment will be required for any significant new retail development in the borough as detailed in the Core Strategy. This requirement will apply to any development outside of the town centre hierarchy.

### 6.2 Enfield Town

#### DRAFT DMD 30

##### Enfield Town

#### 1. Primary Shopping Frontages

Proposals involving the change of use to non A class uses will be refused within the primary shopping frontage.

A change of use on the ground floor to non-A1 will only be permitted if all of the following criteria are met:

- a. The proposed use does not create two or more adjoining non-A1 uses and not more than two non-A1 units within any six consecutive units; and
- b. The proposed use does not harm the predominant retail character of the primary shopping frontage; and
- c. The proposed use is an appropriate A class use demonstrably adding and complementing to the primary shopping function of the primary shopping frontage and to the vitality and viability of the role of the centre and provides a direct service to the public; and
- d. The shop front is retained/protected and achieves an active street frontage at ground floor level during the day; and
- e. Does not have a detrimental visual impact on parade and respect the retail character of the area; and
- f. Does not create an over-concentration of similar uses.

The Council will support other uses converting back to retail.

#### 2. Secondary Shopping Frontages

A change of use on the ground floor to non-A1 will only be permitted if all of the following criteria are met:

- a. The proposed use should not create more than two non-A1 uses within any four consecutive units; and
- b. The proposed use does not over dominate nor detract from the primary shopping role;
- c. The proposed use is an appropriate town centre use as listed in paragraph 6.0.2 and complements to the shopping function of the secondary frontage of the centre; and
- d. The proposed use provides a direct service to the public; and
- e. A shop front is retained; and
- f. The proposed use achieves an active ground floor frontage during the day, does not have a detriment visual impact and respect the character of the centre; and
- g. The proposed use would contribute to the implementation of an approved regeneration strategy or plan for the area; and
- h. The proposed use does not result to an adverse impact on the amenities of nearby occupiers; and
- i. There is no local adverse impact on safety and traffic flows, or unacceptably add to traffic and parking problems in the centre.

Within the Enfield Town Regeneration Priority Area as defined on the Policies Map, a wider range of uses will be supported where the proposal will contribute to the design quality, activity levels and character of the area; complement other uses on the frontage, have no adverse impact on the amenity of the neighbouring area; and contributes towards meeting the future requirements set out in Core Policy 43 and the emerging Enfield Town Area Action Plan.

*This policy should be read in conjunction with Core Strategy Policy 17 and 18.*

## 6 Town Centres and Shopping

### Justification and guidance on implementation

- 6.2.1** The Council will protect the existing retail areas of Enfield Town by managing the changes of use from retail (A1) to non-retail uses. Primary and secondary frontages, which collectively form the primary shopping area within Enfield Town, will be managed to reinforce their attractiveness, vitality and viability.
- 6.2.2** Proposals within the secondary frontage should not lead to an over-concentration of non-retail uses so as to create a significant break in the retail frontage and thereby affecting the retail prosperity of the frontage and the vitality of the centre.
- 6.2.3** This policy is underpinned by the Council's Retail studies undertaken in 2007 and subsequently updated in 2009. It builds on Core Policy 17 seeking to maintain and strengthen the town centres, and reflects the guidance contained within the London Plan and the NPPF.
- 6.2.4** The primary shopping frontages are parades that form the core of the town centre, and as such they are mostly retail (A1) units. The loss of A1 floorspace within these frontages will generally be resisted and conversions to retail generally supported.
- 6.2.5** Secondary frontages are frontages which play an important and complimentary role to the town centre. The uses are mostly retail but a controlled level of diversification is encouraged subject to the criteria set out in the policy.
- 6.2.6** In assessing planning applications, vacancy periods will be a material consideration. Section 5.7 of this document will be used to advise applicants.

### 6.3 Angel Edmonton, Edmonton Green, Palmers Green and Southgate

#### DRAFT DMD 31

#### Angel Edmonton, Edmonton Green, Southgate and Palmers Green District Centres

Within the Primary Shopping Areas of Angel Edmonton, Edmonton Green, Southgate and Palmers Green district centres the Council will protect the existing retail uses by managing the change of use from A1 retail to non A1 retail uses.

A change of use from A1 retail to non A1 retail uses on the ground floor will be permitted if all of the following criteria are met:

- a. The proposed use should not create more than two non-retail uses within any four consecutive units;
- b. The proposed use does not over dominate nor detract from the primary shopping role;
- c. The proposed use is an appropriate town centre use as listed in paragraph 6.0.2 and complements the shopping function of the secondary frontage of the centre;
- d. The proposed use provides a direct service to the public;
- e. A shop front is retained;
- f. The proposed use achieves an active ground floor frontage during the day, does not have a detriment visual impact and respect the character of the centre;
- g. The proposed use assists with the regeneration and revitalisation aims of the community;
- h. A local need exists for the proposed use;
- i. The proposed use does not result to an adverse impact on the amenities of nearby occupiers; and
- j. There is no local adverse impact on safety and traffic flows, or unacceptably add to traffic and parking problems in the centre

*This policy should be read in conjunction with Core Strategy Policy 17 and 18.*

## 6 Town Centres and Shopping

### Justification and guidance on implementation

- 6.3.1** Striking a balance of retail and non-retail uses is a vital ingredient to ensuring the vitality and viability of town centres. For this reason it is essential that a critical mass of retail (A1) use is maintained within the primary shopping areas of the borough's district centres and that concentrations of non-retail units within frontages are resisted. Through this Policy, the Council seeks to maintain the physical continuity and visual appearance of a shopping parade by protecting and retaining a shop front where a change of use is acceptable.
- 6.3.2** In assessing planning applications, vacancy periods will be a material consideration. Section 5.7 of this document will be used to advise applicants.

### 6.4 Local Centres and Local Parades

#### DRAFT DMD 32

##### Large Local Centres, Small Local Centres and Local Parades

Proposals involving a change of use from retail (A1), A2-5 (inclusive), leisure or community uses within local centres will be refused unless the proposed use provides a service that is compatible with and appropriate to the local centre.

A change of use from retail (A1) to non-retail on the ground floor will only be permitted if all of the following criteria are met:

- a. The role and function of the centre remains predominantly retail. The number of A1 shop units must be no less than 50% of the total number of commercial units within defined centres and there must be no less than 50% A1 within any one parade; and
- b. The use does not result in an adverse impact on the amenities of nearby occupiers, including litter or fumes; and
- c. The proposal will not have an adverse impact on safety and traffic flows or unacceptably add to traffic and parking problems in the area; and
- d. Where applicable, the change of use would not result in a significant break in the continuity of the retail frontage of the shopping parade; and
- e. The frontage is retained/protected and the design of the frontage would be compatible with the use of the premises and the surrounding area and achieves an active frontage at ground floor level.

If planning permission is granted, conditions may be used to:

- Prevent amalgamation of small units to create large out of centre units ;
- Limit internal alterations by specifying the maximum floorspace permitted;
- Manage the type of goods sold or type of use or activity.

*This policy should be read in conjunction with Core Strategy Policy 17*

### Justification and guidance on implementation

- 6.4.1** The Council will protect and improve the provision of day-to-day goods and services in local centres and local parades within the borough. These centres and parades are protected to primarily meet the local needs of the residents in the local neighbourhood.
- 6.4.2** The Council's approach to these centres and parades is that the primary retail role should be retained, whilst other non-retail uses falling within "A" use classes and community uses that provide a complimentary role will also be supported, subject to their impact on the residential amenity and compliance with other relevant Local Plan policies.

## 6 Town Centres and Shopping

- 6.4.3** The Council recognises that local shops remain essential to many and serve an important community function. Equally they have a key role to play in delivering sustainable economic growth and development, providing access to day-to-day necessities, typically food, newsagents, and post offices within a reasonable walking distance from home. The Council considers that they are important to retain for sustainability reasons and to cater for future needs created by projected population increase and higher density living.
- 6.4.4** This policy gives greater control to protect local food shopping and applies where a change of use is sought from retail to non-retail and the existing or last use of the shop was selling day-to-day necessities.
- 6.4.5** In assessing planning applications, vacancy periods will be a material consideration. Section 5.7 of this document will be used to advise applicants.
- 6.4.6** The boundaries of Enfield's local centres and local parades are identified on the Policies Map and have been informed by a survey of town centres undertaken in 2011.

### **Town Centre Uses and Boundaries Review - seeking your views**

The boundaries for the borough's town centre, district centres, large and small local centres and local parades are shown on the Policies Map. The extent of these boundaries have been reviewed and informed by a survey of town centres undertaken in 2012. More details of this review can be found in the "Town Centre Uses and Boundaries Review" document which accompanies the DMD.

## 6.5 Loss of Individual Shops and Small Clusters of Shops

### **DRAFT DMD 33**

#### **Loss of Individual Shops and Small Clusters of Shops Outside Designated Retail Areas**

The Council will protect individual local shops and small groups of shops (A1) located outside the designated retail areas, which serve the local needs, and will seek to ensure that there is an accessible provision of essential daily goods within reasonable walking distance around the borough.

A change of use on the ground floor away from A1 retail to non A1 retail uses will be permitted if all of the following criteria are met:

- a. Where this provides an existing convenience shopping facility, ensure that there is an adequate and equally accessible provision alternative convenience shopping facility within a reasonable walking distance of 400 metres; and
- b. The existing range of shops is not adversely affected; and
- c. The frontage is retained/protected and the design of the frontage would be compatible with the use of the premises and the surrounding area and achieves an active frontage at ground floor level; and
- d. The proposed use would provide a community function or service to support viability and vitality of the area in preference to a change of use to residential; and
- e. The proposed use does not harm the character, appearance, and amenity of the area; and
- f. The proposed use does not harm the existing environment or transport system or unacceptably add to traffic and parking problems in the area.

*This policy should be read in conjunction with Core Strategy Policy 17.*

## 6 Town Centres and Shopping

### Justification and guidance on implementation

- 6.5.1** This policy applies to all individual A1 shops and small clusters of A1 units (6 units or less) not identified as local parades on the Proposals Map.
- 6.5.2** The provision of local shopping and related facilities within a reasonable walking distance is a vital part in achieving equality of opportunities and sustainable neighbourhoods. Individual shops and small clusters of shops provide a valuable service to the local population providing locally accessible facilities and in some instances can form a vital component of local community cohesion.
- 6.5.3** In assessing planning applications, vacancy periods will be a material consideration. Section 5.7 of this document will be used to advise applicants.

### 6.6 Vacant or Underused Floorspace above Shops in Town Centres

#### DRAFT DMD 34

##### Vacant or Underused Floorspace above Shops in Town Centres

Proposals for the re-use or refurbishment of the upper floors of shops and/or commercial premises within Enfield's town centres as identified on the Policies Map for appropriate uses will be permitted, provided that all of the following criteria are met:

- a. The proposal provides a separate and adequate access to the upper floor;
- b. The proposal does not negatively harm the existing servicing and parking arrangements;
- c. There is adequate arrangement for refuse storage and collection;
- d. The proposed use does not adversely affect the functioning or appearance of the units and shopping centre or surrounding residential amenity; and
- e. The proposal does not have any conflict with other policies in the Local Plan

Appropriate uses include: leisure, community, commercial or residential. Proposals involving employment and business opportunities involving premises for small businesses or start-ups, offices and small workshops, will be considered favourably.

The Council will support the self containment and subdivision of existing residential accommodation above shops, where this meets the relevant DMD criteria for this type of development.

*This policy should be read in conjunction with Core Strategy Policy 17.*

### Justification and guidance on implementation

- 6.6.1** Town centres are the focal point for the local community, which can provide both commercial and residential functions. Commercial premises in town centres with vacant units above present an ideal opportunity to increase the numbers of people living within sustainable locations, contributing towards the borough's housing requirements. Encouraging the re-use or refurbishment of units above shops and other commercial premises within Enfield's town centres for appropriate town centre uses, where appropriate has the benefit of enhancing the character and broaden the range of services, increasing natural surveillance, contributing to regeneration and promoting sustainable utilisation of town centres, reducing the pressure for out of centre development.

## 6 Town Centres and Shopping

### 6.7 Development Involving Tourism and Visitor Accommodation

#### DRAFT DMD 35

#### Development Involving Tourism and Visitor Accommodation

##### 1. Appropriate locations for Development

In line with Core Policy 12: Visitor and Tourism, the Council will support the appropriate expansion of hotel facilities and will encourage these uses to be located in:

- a. Town Centre locations of: Enfield Town, Angel Edmonton, Edmonton Green, Southgate, Palmers Green and large local centres; or
- b. Locations which have good public transport connections to central London and/or international or national termini; or
- c. Where there is a large trip-generating tourist attraction; or
- d. Upper Lee Valley area when accompanied by proposals to improve public transport accessibility and where the development would not contradict other Local Plan policies for this area.

##### 2. Development Requirements

Where the above can be demonstrated, proposals for the development or expansion of a tourist attraction and proposals for tourist accommodation such as hotels, hostels, boarding and/or guest houses, bed and breakfast (use class C1) will be permitted, providing all of the following criteria are met:

- a. The size and character of the site or building are suitable for the proposed use; and
- b. The proposed use will be compatible with the character and appearance of the area; and
- c. The proposed use is of an appropriate nature and scale to meet the needs of an existing tourist facility or attraction; and
- d. The proposal contributes to a range and balance of accommodation, and does not result in an over concentration of hotel, boarding and/or guest houses in that particular locality; and
- e. The proposed use does not involve a loss to any housing stock in line with other DMD policies on housing; and
- f. The residential amenities of local residents will not be adversely affected by way of noise, disturbance, loss of light or privacy; and
- g. The existing environment or transport system will not be adversely affected by way of unacceptable increases to traffic and parking in the area; and
- h. The proposal has adequate servicing arrangements and provides the necessary off-highway pickup and set down points for taxis and coaches; and
- i. The proposal provides on-site accommodation and training for staff, where the scale of the development allows; and
- j. At least 10% of all hotel rooms will be provided to wheelchair accessible standards; and
- k. The proposal is designed in line with DMD Policies relating to Design and Sustainable Design and Construction

##### 3. Other Requirements

Major development should be accompanied by supporting information, such as a Transport Assessment. The level of information required should be agreed with the Council prior to submitting a planning application, however its must broadly demonstrate:

- a. That there are no adverse impacts on residential amenity; and
- b. Arrangements for securing public access to ancillary facilities e.g. conference facilities, gyms and/or restaurants; and
- c. An assessment of local provision of other visitor accommodation in the area.

## 6 Town Centres and Shopping

*This policy should be read in conjunction with Core Strategy Policy 12.*

### Justification and guidance in implementation

- 6.7.1** The London Plan provides the context for growth and locational requirements for the hotel sector in London to provide both tourist and visitor accommodation. The Mayor has identified a potential growth of 40,000 bedrooms by 2026, a need to reduce pressure on central London, and the need to provide more affordable hotel capacity. Furthermore, it sets out the requirements to provide on-site employee accommodation and training for staff helping to address low pay and recruitment problems in the tourism sector.
- 6.7.2** Tourist and visitor facilities can create jobs and support the visitor economy it is important to ensure that planning objectives are met, in particular seeking a balance of supporting uses and minimising impact on surrounding residential amenity. In addition, development associated with tourism and visitor accommodation generate significant vehicle movements, that are required to be taken into account.
- 6.7.3** In determining the location of tourist and visitor accommodation within the borough, the Council considers that town centres offer the most sustainable locations followed by areas with good access to public transport and other tourist attraction in the borough.
- 6.7.4** It is important that proposals for large tourism or visitor facilities in the borough do not conflict with specific policies relating to town centres. Whilst at the same, ensuring that an appropriate level of hotel uses are provided to compliment/support the range of retail and services that exist in town centre locations.
- 6.7.5** Development associated with tourism and visitor facilities can have a beneficial role to play in serving local needs, for example by accommodating local business clients, add to the vitality and vibrancy of town centres, and contribute to broaden the sustainability and regeneration objectives of the borough.

## 6.8 Managing the Impact of Food and Drink Establishments In and Outside of Designated Centres

### DRAFT DMD 36

#### Managing the Impact of Food and Drink Establishments In and Outside Designated Centres

1. Proposals involving the establishment of food and drink uses (A3, A4 and A5 – inclusive) will be permitted in the following locations:
  - a. The secondary retail frontage of Enfield Town;
  - b. The primary shopping areas of the borough's four district centres: Angel Edmonton, Edmonton Green, Palmers Green and Southgate; and
  - c. Local Centres and Local Parades.
2. Proposals involving the establishment of food and drink uses will be determined subject to the following criteria:
  - a. There must be no adverse effects to the character, role, function, vitality and viability of a shopping centre and the local area;
  - b. There is no detrimental effect to the amenity of neighbouring residents;
  - c. There is no detrimental effect on the local environmental quality as a result of noise, vibration and smells;
  - d. Access, servicing and parking arrangements for the proposal do not result in an adverse impact on the safety and traffic flows or cause unacceptable increases to traffic and parking.

## 6 Town Centres and Shopping

3. Conditions on any permission granted may include the following
  - a. Acceptable levels of odour and fume extraction,
  - b. Disposal of waste products,
  - c. Litter and the provision of litter bins,
  - d. Hours of operation, and
  - e. Any other potential nuisance.
4. The Council will seek to prevent the clustering of A3/A4/A5 units within shopping frontages. Permission will be refused for any proposed A3/A4/A5 unit that would be located adjacent to an existing or proposed A3/A4/A5 unit. Furthermore there should be a minimum of two non-A3/A4/A5 units, or at least 10 metres, between the units, which ever is greater. There should be no loss of active street frontage.
5. However, the restriction above can be waived in certain locations where a cluster of food and drink establishments would contribute to the implementation of an approved regeneration strategy or plan of the area.
6. Proposals involving hot food takeaway (A5) uses that fall within 400 metres of an existing or proposed secondary school entrance will not be permitted.

*This Policy should be read in conjunction with Core Strategy Policies 7 and 17.*

### Justification and guidance on implementation

- 6.8.1** Food and drink use classes include: A3 restaurants and cafes for the sale of food and drink consumed on the premises; A4 drinking establishments, which includes public houses and wine bars, but not nightclubs and; A5 hot food takeaways for the sale of hot food for consumption off the premises. Food and drink establishments provide an important and valued service to the borough, meeting demand and generating employment. A3 uses that are open during daytime shopping hours can play a beneficial role in the vibrancy and viability of a town centre or local parade. There are also potential negative impacts of food and drink establishments, in particular A5 uses, which must be considered and mitigated in any development decision. A3, A4 and A5 uses will be directed towards non-core shopping frontages.
- 6.8.2** There is increasing concern nationally and locally over the rising levels of obesity in the population, in particular among young people. The proliferation of take away outlets in recent years, frequently selling fried and fatty foods, has increased the availability of such food. Restricting new A5 use applications in close proximity to secondary schools entrances is designed to reduce the opportunities for consumption of such foods, since 400m is the average distance people will walk to get hot food. Health issues relating to food in the borough are highlighted in the Enfield Food Strategy. The policy is also supported by Enfield's 2011 'Childhood Healthy Weight Strategy' which seeks to 'reduce the number of new takeaways opening in proximity to schools and academies'.
- 6.8.3** The policy element on clustering is aimed at controlling the proliferation of takeaways over the long term, reducing the potential for damaging health impacts of excessive consumption of unhealthy foods.

## 6 Town Centres and Shopping

### 6.9 Evening Economy

#### DRAFT DMD 37

##### Evening Economy

The evening economy includes uses such as theatres, cinemas, arts venues, restaurants, bars and pubs. Development proposals which foster a diverse evening economy will be permitted, subject to the location criteria set out in DRAFT DMD 29 'New Retail and Leisure Development', **and** the following criteria:

1. The proposal achieves an active ground floor street frontage during the day and evening;
2. There is no adverse affect on the amenity of neighbouring and local residents due to noise and disturbance; and
3. Measures are in place to address issues such as community safety, policing and litter;
4. The proposed use is in keeping with the scale and character of the surrounding area.

Planning permission for evening economy uses may set conditions which include the following:

1. Maximum noise levels;
2. Provision of acoustic glazing;
3. Provision of acoustically treated ventilation;
4. Provision of acoustic lobby entrances and exits to act as a sound barrier;
5. Installation of sound limiters linked to sound amplification equipment;
6. Prohibition of external playing of amplified music;
7. Restricted delivery times; and
8. Restricted hours of operation in accordance with the appendix Commercial Opening Hours.

*This policy should be read in conjunction with Core Strategy Policies 11 and 17.*

#### Justification and guidance on implementation

- 6.9.1** The vibrant and diverse evening economy can bring benefits to the local economy through sustaining businesses and providing jobs, while providing venues for entertainment, culture and socialising to residents and visitors alike. However, these benefits must be balanced against the problems that can be caused by the evening economy, such as anti-social behaviour, fear of crime, noise, congestion and disturbance to local residents and other users of the borough's town and district centres, including those people who might be dissuaded from using the town centre due to poor perceptions of public safety after dark.
- 6.9.2** The Town Centres Study (2007) found that the evening economy in Enfield's town centres largely consisted of restaurants and pubs. The Study recommended a diversification of the entertainment and leisure facilities in these centres to help grow the evening economy. Diversifying and growing the evening economy can improve the leisure and cultural experience available in the borough, while growing the economy and providing jobs, in accordance with Core Policy 17 and the NPPF.
- 6.9.3** In suitable areas of the town centres, the Council will encourage applications that add to the mix of uses, and would be particularly in favour of applications that would seek to expand the diversity of the evening economy of Enfield Town, Angel Edmonton, Edmonton Green, Southgate and Palmers Green.
- 6.9.4** There is a trend towards multiple uses of some pubs, bars and similar establishments, for example opening for breakfast, and taking on a café aspect during the daytime by serving coffee. Such trends will broadly be supported as they widen the offering and broaden the appeal of town centres.

## 6 Town Centres and Shopping

### 6.10 Banqueting Suites/ Function Halls

#### DRAFT DMD 38

##### Banqueting Suites

The Council will support proposals for the provision or expansion of banqueting suites in appropriate locations. Preferred locations include retail parks and the upper floors in town centre buildings, or other similar locations that are accessible by a range of sustainable transport modes and where the impact on residential areas is minimised. Banqueting suites provided as part of a dual use developments incorporating a conference suite or integrated with a hotel complex will be supported subject the criteria set out in DRAFT DMD 35 'Development Involving Tourism and Visitor Accommodation'.

Planning Permission will only be granted if the proposal:

- Has no impact on neighbouring residential properties in terms of noise and disturbance; and
- Has adequate servicing arrangements and does not result in an increase of on-street parking and traffic congestion in the surrounding area; and
- Complies with opening and closing times set out in the appendix Commercial Opening Hours.

Proposals for banqueting suites on Strategic Industrial Locations (SIL) and Locally Significant Industrial Sites (LSIS) will be refused.

*This policy should be read in conjunction with Core Strategy Policy 6.*

#### Justification and guidance on implementation

- 6.10.1** For a number of communities within the borough banqueting suites provide an important venue, enabling large numbers of people to congregate and socialise, in particular for special events such as weddings. Banqueting suites tend to be large in scale, catering for events of 300 to 600 people.
- 6.10.2** The scale of banqueting suite venues can lead to negative impacts on amenity for neighbours due to noise and disturbance from people arriving at and departing from the site, particularly late at night. These venues tend to encourage car borne trips due to the nature of the use and where transport accessibility is poor.
- 6.10.3** In recent years there have been a number of applications for banqueting halls on Strategic Industrial Locations that in most cases the Council has sought to resist. Proposals are unlikely to be supported in Strategic Employment Locations (SIL) and Locally Significant Industrial Sites (LSIS) where the overriding need is to retain such sites for industrial and commercial uses in accordance with the DRAFT DMD 23 'Appropriate Uses in Strategic Industrial Locations' and DRAFT DMD 24 'Appropriate Uses in Locally Significant Industrial Sites'.

### 6.11 Social Clubs

#### DRAFT DMD 39

##### Social Clubs

Proposals involving Social Clubs will be permitted subject to the following criteria:

- The proposed development is located within a local, district or major centre, but not within a primary shopping frontage; and

## 6 Town Centres and Shopping

- The proposal does not undermine the vitality and viability of the local or town centre within which it is set;
- There is no over-concentration by requiring a minimum of five non-social club units between the proposed site and the next existing social club premises, or at least 25m, between them, whichever is greater; and
- The daytime use of the premises is explored and detailed in the application.
- The proposal should be designed such as to provide an active frontage during the daytime and evening, and to have regard to the visual impact on the street, in accordance with DRAFT DMD 40 'The Design of Business Premises'.
- Opening hours are in accordance with the appendix Commercial Opening Hours.

*This policy should be read in conjunction with Core Strategy Policy 6.*

### Justification and guidance on implementation

- 6.11.1** The social clubs described by this policy are premises where people, frequently men from some ethnic-minority and other groups, gather to socialise together. This policy does not include the social clubs sometimes associated with sports clubs, which are usually located within the sports-clubs' own facilities.
- 6.11.2** Social clubs provide an important meeting place for some ethnic and other groups resident in the borough to congregate and socialise together. Applications are most frequently for premises on retail frontages, often towards the fringes of the town centres and close to residential areas. Social clubs can be a suitable use for premises, particularly in smaller town centres, and can provide for an important community need. One negative aspect is that social clubs often have blank frontages, and care must be taken to meet the requirements of DRAFT DMD 40 'The Design of Business Premises'. Opening hours are often until late in the evening, when exiting clients can create disturbance to local residents. The needs of the users must be balanced against the wider community interests.

# Built Environment

## 7 Built Environment

### 7 Built Environment

- 7.0.1** Policy 30 of the Core Strategy states that “all developments and interventions in the public realm must be high quality and design-led, having special regard to their context”. This is intentionally all-encompassing of any modification to our environment irrespective of type, size or location. For convenience, this scope is paraphrased as “interventions” in the remainder of this section.
- 7.0.2** The following policies build on the general framework for ensuring high quality design set out in policies DRAFT DMD 1 'Achieving High Quality and Design-Led Development' and DRAFT DMD 2 'Design Process' by drawing attention to particular topics and issues of importance to Enfield. However, design is necessarily a cross-cutting issue, and where design considerations are intrinsically linked to a particular topic that is covered elsewhere, these considerations will be discussed in the associated policies.
- 7.0.3** The NPPF makes clear that the purpose of the planning system is to deliver sustainable development across economic, environmental and social considerations. Thus, the primary objective of the following design policies is to make Enfield more sustainable. Good design achieves this by:
1. Helping to manage resources efficiently and ensuring that interventions have a positive impact on the environment;
  2. facilitating learning, business and other transactions, thereby enriching the economy;
  3. and fostering social interaction, community cohesion, and improving people’s quality of life.
- 7.0.4** All aspects of development form (layout, structure, urban grain, landscape, density, mix of uses, height, massing, architectural detailing and materials), can impact on economic, environmental and social vitality.

#### 7.1 Design considerations for Business Premises

##### DRAFT DMD 40

##### The Design of Business Premises

- 1) All new business premises must make efficient use of land and maximise their contribution to the urban environment. Development must:
- a. Positively address the public realm: publicly accessible and more active areas should front the public realm and be located close to the site entrance. Building entrances should be prominently located and clearly indicated through the architecture and/or massing of the building. The amount and location of fenestration, landscaping, means of enclosure, architectural detailing and lighting should all help to create a pleasant and safe environment for pedestrians, cyclists and vehicles at all times of the day; and
  - b. Clearly differentiate public and private areas and respect any appropriate, existing building lines. In the absence of such a feature, the development should establish one; and
  - c. Provide inclusive access arrangements and encourage commuting via cycle and foot, and where possible provide supporting facilities such as showers and lockers; and
  - d. Wherever possible, locate servicing, parking and refuse to the rear, sensitively locating and screening these where visible from the public realm; and
  - e. Be flexibly designed so as to be suitable for a number of different businesses and to facilitate conversion to alternative uses, subdivision and/or amalgamation of units; and
  - f. Through layout, landscaping and other site features help to mitigate the potential for negative impacts on surrounding uses, including consideration of access arrangements for different uses within the site and wider area; and
  - g. Ensure that the massing and facades of buildings are made visually interesting through architectural detailing, height variation and fenestration. Consideration will need to be given to how the development will appear when viewed from the surroundings and in long views; and

## 7 Built Environment

- h. Respect the grain and character of the surrounding area, for example by wrapping larger buildings in smaller units to maintain activity, character and visual interest; and
- i. Use materials that are high quality and should consider how, through the use of local materials and those used in surrounding buildings, a distinct character and area identity can be created, enhanced or preserved.

*This policy should be read in conjunction with Core Policy 30.*

### Justification and guidance on implementation

- 7.1.1** The provisions set out above will help to ensure that the design of business premises improves the quality of the wider area, creates flexible, more sustainable buildings and facilitates access to and through employment areas. Many of these principles are set out in the London Industrial Capacity SPG (Mayor of London, 2008), *Better Places to Work*, (CABE, 2005), and the report; *Industry in the City*, (Urhahn Urban Design, 2006), which was produced for the London Development Agency. This latter document in particular contains additional guidance on design within industrial design, which the Council broadly supports.
- 7.1.2** The Characterisation Study (2011) and conservation area character appraisals give examples of the negative impact of business premises on the urban environment. In particular relating to the location and design of servicing/parking and the need to respect the character of their surroundings. In addition, industry and other businesses are increasingly compatible with other uses (refer to above documents), and the Council is keen to attract greener, high-tech businesses to the borough. As a result, a higher quality environment is needed.
- 7.1.3** The criteria within the above policy will be applied to all industrial and commercial development proposals. In applying the standards, the Council will have regard to the operational requirements of the business and viability. The highest standards of design will be sought in areas where a higher quality environment is necessary, for example:
- In Industrial Business Parks (IBPs);
  - Where high-tech or green industries are being encouraged;
  - Where environmental improvements are being sought as part of a wider strategy;
  - Adjacent to public open spaces including the Lea Valley Regional Park (LVRP);
  - Along routes to and from the LVRP or along routes connecting other trip generators such as between residential areas and leisure facilities, shops and other places of interest or along designated walking/cycling routes;
  - Adjacent to waterways in line with additional design considerations in DRAFT DMD 75 'Waterways'.
  - At the periphery of industrial/commercial areas, or otherwise where industrial units are located in close proximity to residential areas. This is particularly relevant in LSIS;
  - In areas near to town centres, or which have good access to public transport;
  - Within regeneration areas;
  - Where the site is highly visible from the surrounding area;
  - Where the area contains a mix of uses, or where a greater mix of uses is likely to be introduced in the future. (Further design guidance on mixing uses in industrial areas can be found in the above reference documents).

### DRAFT DMD 41

#### The Design of Business Premises outside designated Industrial Areas

In addition to the criteria set out in DRAFT DMD 40 'The Design of Business Premises', business premises outside designated industrial areas must meet the following criteria:

## 7 Built Environment

### 1) With regard to the overall design of new development:

- a. Mixed use development that maintains and supports the primary uses within town and local centres is supported and will be required in larger developments (including shopping centres featuring multiple units and internal circulation), to ensure activity and surveillance at all times of the day;
- b. Residential accommodation at upper floors must have separate access and adequate refuse and servicing arrangements and met other criteria in DRAFT DMD 34 'Vacant or Underused Floorspace above Shops in Town Centres';
- c. Larger developments must integrate with their surroundings maintain active frontages and respect the grain of surrounding development through their massing, architecture and the provision of suitably located, safe, naturally lit and publicly accessible routes.

### 2) With regard to new, and alterations to existing, ground floor frontages:

- a. Frontages must maintain visual interest within the street; and
- b. Frontages must respect the rhythm, style and proportions of the building/group of buildings of which they form a part, avoid damage to existing pilasters, capitals and other significant features, and where possible reinstate lost features important to the character of the street or building; and
- c. A window display must be included and maintained at all times to the reasonable satisfaction of the Council. Window displays should be lit at night using dedicated energy efficient fittings; and
- d. If security shutters are proposed, these should be internally mounted, located behind the fascia and be visually permeable; and
- e. The street number must be displayed within the frontage;

*This policy should be read in conjunction with Core Policy 30.*

## DRAFT DMD 42

### Advertisements

- All advertisements must be of an appropriate size and type in relation to the premises and to the street scene;
- Fascia boards must be of a height and depth consistent with the traditional proportions of the building;
- Proposals for internally illuminated signs, box fascias or projecting box signs will be refused. Externally illuminated fascias and bracketed sign boards may offer an acceptable alternative;
- A restriction on the proportion of the window area taken up with advertisements will be a condition of planning consent. This normally being 10% of the glazed area.

*This policy should be read in conjunction with Core Policy 30.*

### Justification and guidance on implementation

**7.1.4** The above policies refer to all non residential development outside designated industrial areas. The majority of these developments are those offering services to the public that are traditionally integrated within the street and located in town or local centres. However, the policy also applies to business premises located away from such centres. For the purpose of the above policies, frontages are defined as any ground floor element of the building that abuts the public realm.

**7.1.5** The benefits of mixed use developments are well established (By Design: Urban Design in the Planning System: Towards Better Practice, 2000). Residential uses within town and local centres help to support businesses and create a safer environment by ensuring activity and surveillance at all times of the day. To help manage potential conflicts between uses, and to avoid congestion and clutter within the street, separate access arrangements are necessary and servicing and refuse needs to be carefully planned for.

## 7 Built Environment

- 7.1.6** The Enfield Characterisation Study (2011) cites many examples of large scale developments that do not integrate well with their surroundings, harming the character and functionality of the surrounding area. A lack of permeability and a blurring of the boundary between private and public areas can be confusing, inhibit movement within the wider area and create a highly controlled environment that can border on the oppressive (By Design, 2000, Urban Design Compendium 1, 2000). Exposure of service areas to the surrounding public realm is not only visually unattractive, but also creates inactive areas, which feel unsafe and are more susceptible to crime. Wherever possible, developments should be naturally lit to save energy and create healthier environments.
- 7.1.7** The attractiveness of individual shops and other business premises concentrated within the borough's town and local centres is of prime importance to the vitality of shopping centres and to the perception of the borough as a whole. These areas are shared by the surrounding community, and in the case of larger centres, by all of the borough's residents and beyond. They are therefore experienced by a greater number of people than some predominantly residential or industrial areas, and have a correspondingly large impact on the quality of people's lives and their impression of the borough as a whole.
- 7.1.8** The provision of well-maintained shop fronts and appropriate advertisements has been raised in a number of Enfield's conservation area character appraisals, as well as in the Enfield Characterisation Study (2011). The requirements listed above reflect the conclusions of these assessments and the recognition that relatively small changes to individual premises can have a cumulatively large impact on the area as a whole. While conservation areas warrant special protection, the maintenance of a high quality environment throughout the borough is essential to attracting people to spend time and money in the borough's centres.
- 7.1.9** Applicants should look to surrounding buildings, similar buildings elsewhere, historic records (such as photos), and remaining architectural features to develop an appropriate design for replacement shop fronts and advertisements.
- 7.1.10** The requirement to light window displays at night and include visually permeable, internally mounted shutters reflects the need to maintain safety and reduce the fear of crime within centres outside of business hours.

## 7.2 Design of Civic Buildings

### DRAFT DMD 43

#### Design of Civic/Public Buildings and Institutions

1 ) Civic buildings, institutions and other buildings providing services to the public, must be designed to a high standard and have prominence within their community. New development must:

- a. be located and designed to provide a landmark appropriate to their importance and setting, aiding legibility of the wider area;
- b. communicate their importance and function through architectural cues and appropriate and attractive signage (integrated into the built fabric where possible);
- c. positively address the public realm with regard to their means of enclosure, landscaping and the location and design of parking and servicing;
- d. position entrances prominently and conveniently. Inclusive access arrangements should not normally be separate from those designed for general access;
- e. be primarily designed for the intended purpose, but should take opportunities to facilitate ancillary/alternative uses within the building and increase their flexibility.

2) The layout of larger institutions, especially those occupying more than one building, must consider whether public access through the site is necessary in order to prevent interruption of desire lines and/or increase the functionality of the movement network within the area. In these cases, way-finding infrastructure may also be required.

## 7 Built Environment

3) Applications which involve the removal of buildings that are recognised in Local Development Documents as contributing positively to the identity of the local community will be refused unless it can be demonstrated that no other suitable uses for the building, including consideration of conversion, can be found. In these cases, applicants will be required to consider the potential for partial retention in discussion with the Council.

*This policy should be read in conjunction with Core Strategy Policy 30*

### Justification and guidance on implementation

- 7.2.1** Civic/public buildings and institutions are defined as any building that provides a public service, or to which the public have a high degree of access. These can include, but are not limited to: police and fire stations; educational facilities; health care facilities; leisure and cultural facilities; community halls and gathering spaces; administrative centres and government buildings.
- 7.2.2** These buildings are important because they provide a shared resource within communities, thereby being affiliated with a large number individuals and contributing to a shared sense of identity (e.g. Urban Design Compendium, 2000; Approaching Urban Design, 2001). They are also frequently places where people meet or visit to access the services they require. The buildings are often bespoke in their design and by their nature, their appearance and scale are often different to that of surrounding buildings. Therefore, they are likely to stand out and act as landmarks. Many existing examples are highlighted as such in the Enfield Characterisation Study (2011).
- 7.2.3** The combination of their prominence, importance to the community and public accessibility, means that the quality of their design is particularly important. The provisions in the above policy ensure that the potential of these buildings to contribute to a place's identity will be maximised, while ensuring that their function is protected and that all can access the services they provide. In particular, the relationship of the building(s) to the public realm needs close attention. As highlighted in the Enfield Characterisation Study (2011), poor design can create breaks in the building line, leading to a fragmented street exacerbated by prominent and unattractive boundary treatments.
- 7.2.4** Many buildings of this type accommodate ancillary uses, such as after school clubs, meeting rooms or specialist clinics at a GP surgery. The access arrangements, layout and other aspects of site layout and building design can greatly impact upon their ability to support ancillary functions. Failure to build this potential into the design can limit the contribution of the building to the community it serves and also limit the potential for diversification and the introduction of income-generating activities which might otherwise support a struggling facility.
- 7.2.5** Design considerations that may help to increase the flexibility of civic/public buildings include, but are not limited to: the relationship with the street; the location and number of entrances; the circulation within the building including the position of lobby areas and access cores; the overall depth of the building; the construction method and how easy it is to add/remove/subdivide parts of the built fabric; the relationship to open space; the distancing between and orientation of different parts of the building; the servicing and parking arrangements etc.
- 7.2.6** Loss of a civic building of architectural merit not only constitutes a loss of a local facility and landmark, and thus a dilution of the identity of local communities (as discussed in the Enfield Characterisation Study 2011), but also results in the loss of embodied energy and materials contained within the structure being removed. Therefore, very effort should be made to reduce the necessity of removal if an alternative use/conversion is viable.
- 7.2.7** The Enfield Characterisation Study (2011) discusses how larger institutions have the potential to create a barrier to movement, especially when security measures are introduced to limit access to the site. Measures such as the creation of internal streets can maintain security while preserving/creating public routes along desire lines. The provision of improved routes at the boundary (e.g. improving existing routes, creating new routes and providing landscaping, lighting and appropriate street furniture) can also help to improve the accessibility and movement network of an area.

## 7 Built Environment

- 7.2.8** Applicants should refer to more detailed guidance and best practice examples regarding the specific design considerations for different types of civic/public buildings and institutions.

### 7.3 Tall buildings

#### DRAFT DMD 44

##### Tall Buildings

1) The below criteria give an indication of whether a location is likely to be considered inappropriate, sensitive or appropriate for tall buildings. Tall buildings will not be acceptable in areas classified as *inappropriate*. There will be a presumption against tall buildings in *sensitive* areas, with the onus being on the developer to demonstrate how the proposal avoids the negative impacts associated with the *sensitive* classification. Applications for tall buildings in areas meeting the *appropriate* criteria may be acceptable in principle. However, in accordance with the London Plan and current guidance, the actual suitability of a proposal will always depend on the context of the site and details of the proposed building.

Areas where tall buildings would be *inappropriate* include:

- a. at the urban fringe (refer to DRAFT DMD 83 'The Urban Fringe');
- b. within the boundary, in the immediate vicinity of, or along views to or from:
  - i. conservation areas;
  - ii. nationally or locally listed buildings;
  - iii. scheduled or locally listed ancient monuments;
  - iv. nationally or locally registered historic parks and gardens.

Areas likely to be *sensitive* to tall buildings include:

- c. where they would infringe upon or detract from important local views;
- d. ridges or other areas of high ground where they would have a significant impact on the horizon;
- e. where existing development is of good quality, and is relatively homogenous in scale, grain and height, contributing to a strong sense of place (including the categories described as Residential Perimeter Blocks in the Enfield Characterisation Study, 2011).

Areas that may be *appropriate* for tall buildings are likely to be those outside of the above areas and:

- f. that have good access to public transport, and/or;
- g. where existing and *appropriate* clusters of tall buildings exist, and/or;
- h. they are within designated town centres, activity hubs or regeneration areas.

In the majority of cases more than one or all of the above criteria will need to be met, depending on the proposal.

2) Further and more detailed urban design analysis will need to be undertaken in all cases to examine the suitability of individual sites. In addition to the requirements set out in policy 7.7 of the London Plan (2011), proposals for tall buildings must:

- a. provide a landmark signifying a civic function or a location/area of importance and interest and/or add to the legibility of the borough.
- b. provide adequate amenity space for all residential units.
- c. take account of their impact on existing important and highly visible structures (including other tall buildings) and the cumulative impact of tall buildings (including consideration of extant permissions).

## 7 Built Environment

- d. exhibit high standards of sustainable design and construction and architectural quality, the later to include consideration of scale, form, massing, proportion and silhouette, facing materials and relationship to other structures with particular attention to the design of the base and top of the building.
- e. contribute to the physical and visual permeability of the site and wider area, aiding legibility and movement.
- f. contribute positively to the public realm through the relationship to the surrounding environment and, where appropriate, through the provision of high quality public space.
- g. consider implications of their night-time appearance, vehicle movements and the amenity of those in the vicinity (e.g. shadowing and overlooking).

Both the requirements of Policy 7.7 of the London Plan (2011) and those additional requirements above should be explicitly addressed in the applicant's Design and Access Statement, which should include a detailed urban design analysis of the proposal showing how it responds to, and impacts upon, its context.

3) Applicants will be required to submit fully rendered day and night visualisations of the proposal as seen from the surrounding area, including from agreed points within important local views.

4) There are a number of existing tall buildings that do not meet the above criteria and are therefore inappropriate to their context. Any proposal for redevelopment of these sites must result in a significant reduction in negative impact. Thus, while the above criteria will be applied to replacement buildings, the degree to which each criterion can be achieved (including the overall reduction in height) will be weighed against any net improvement to the quality of the development and its impact on the surrounding area.

*This policy should be read in conjunction with Core Strategy policy 30*

### Justification and guidance on implementation

#### Review of existing tall buildings and important local views - seeking your views

The Council has undertaken a review of existing tall buildings within the borough and categorised them as appropriate or inappropriate in terms of their location and form, in the context of the draft policy. A review of important local views has also been undertaken. More details of this review are set out in "Report on location of Tall buildings and Important local Views in Enfield" paper which accompanies this draft DMD.

- 7.3.1** Tall and large buildings are those that are substantially taller than their surroundings, cause a significant change to the skyline or are larger than the threshold sizes set for the referral of planning applications to the Mayor (London Plan 2011).
- 7.3.2** The emphasis is on the context of the development, and therefore it is not possible to provide a borough-wide threshold above which a building is considered tall. Proposals will be considered on a case-by-case basis and applicants are advised to seek advice from the Development Management Team if their proposal may fall within the above definition.
- 7.3.3** Tall buildings, by their nature, are more visible, have a greater impact on microclimate and are usually more intensively used than smaller buildings. These impacts can be positive, negative, or a mixture of both, but will always depend on the context within which the building is located.
- 7.3.4** Many of the criteria for determining whether an area is appropriate for tall buildings are well established through guidance such as the joint Commission for Architecture and the Built Environment(CABE)/English Heritage publication *Guidance on Tall Buildings (2007)*. The London Plan and a number of other local authorities have therefore identified similar assessment criteria.

*Criteria for Inappropriate Areas:*

## 7 Built Environment

- 7.3.5** *Urban Fringe:* the NPPF states that the essential characteristics of Green Belts are their openness and permanence. Tall buildings positioned at the urban fringe are likely to adversely impact on openness due to their high visibility and the increased level of enclosure that they produce. The level of impact will also be influenced by a number of factors including topography, vegetation, views and existing structures.
- 7.3.6** *Heritage Assets* are important landmarks whose settings are sensitive to development of most kinds. Tall and highly visible buildings are likely to significantly distract from these features.

### Criteria for Sensitive Areas:

- 7.3.7** A number of *important local views* have been identified which aid to legibility of the borough, London and of the countryside beyond. These views, identified in the *Report on the Location of Tall Buildings and Important local Views in Enfield* (an evidence base document which accompanies this draft DMD), also have a recreational value and contribute significantly to local identity and a sense of place. The introduction of highly visible and dominant features (such as tall buildings) within these views has the potential to significantly detract from their value. They are therefore sensitive to such development. Tall buildings within an important local view may be acceptable where it aids comprehension of the structure of the borough; how the borough fits into its wider context; or where the insertion of a tall building would enhance the skyline. Consideration will need to be given to the impact when viewed from a variety of directions and distances.
- 7.3.8** *Ridges and high ground:* The Enfield Characterisation Study, 2011, recognises that Enfield's undulating landscape creates visually enclosed areas that appear completely rural despite proximity to London, and states that the surrounding roofscape plays an important role in this character. Tall buildings on ridges and high ground will be particularly visible, have a greater impact on the roofscape and skyline. This makes ridges and high areas more sensitive to tall buildings. However, tall buildings may be appropriate in these areas in a limited number of circumstances.
- 7.3.9** Enfield is fortunate to have large areas of development that is of *good quality, and is relatively homogenous in scale, grain and height* that, while not unique to the borough, nevertheless create a high quality environment that is valued by residents. These areas are mainly those mapped and described as "residential perimeter blocks" in the Enfield Characterisation Study, 2011. The study highlights that the homogeneity and low-rise nature of these areas is key to their sense of place. Therefore they are likely to be sensitive to the introduction of taller buildings, which by definition, would differ from the predominant development form.

### Criteria for Areas that may be Appropriate:

- 7.3.10** *Areas that have good access to public transport:* Taller buildings offer the opportunity to significantly increase densities, thereby making more efficient use of land. However, to support such intensity of use, and to prevent increasing reliance on private vehicles for transport, they will usually be more appropriate in areas with good access to public transport. This is generally defined as areas of PTAL 4 or higher. However, PTAL is a simplified measure of transport access and the details of provision will need to be examined on a case-by-case basis. In rare circumstances, there may be a justification for a tall structure in an area with a lower level of access to public transport. For example, where the structure does not increase the intensity of use of a building, or have the potential to do so in the future, but nevertheless aids legibility or creates a landmark.
- 7.3.11** The use to which the building is put is also an important consideration in terms of intensity of use and in defining character. For example, some industrial buildings necessarily contain taller elements such as stacks or chimneys that are necessary to their operation and are appropriate to the character of the area. While these structures may be appropriate, a tall residential building of a similar height may not.
- 7.3.12** Where *existing and appropriate clusters of tall buildings* already exist: Tall buildings can often compliment each other by forming cohesive clusters, where their cumulative contribution to the skyline, sense of place, and function as a landmark to aid legibility is greater than the sum of their parts.

## 7 Built Environment

**7.3.13** *In town centres, regeneration areas or at activity hubs:* Partly due to the availability of services, concentration of civic functions, high accessibility levels and the desirability of the inclusion of landmarks, these areas are often more appropriate for tall buildings and the intensity of use which they generate. In addition, tall buildings, where considered appropriate when judged against other criteria, can play an important part in acting as a highly visible beacon of regeneration, significantly contributing to changing the perception and/or identity of an area.

*Criteria for assessing the proposal:*

**7.3.14** Tall buildings are highly visible, and should therefore contribute to the legibility of an area by marking points of civic interest or importance, for example a gateway, civic function, leisure facility or an important area. Tall buildings that do not relate to such functions may be confusing and adversely affect the legibility of the area.

**7.3.15** In some instances, the provision of sufficient amenity space for tall buildings exclusively at ground-level may not be possible without adversely impacting on the urban structure. In addition, the distance from upper floors to ground level may mean that the ground-level space is under-used. In these cases, the presence of existing nearby open space is advantageous and the provision of high quality amenity space in the form of balconies and terraces is of greater importance. Such amenity spaces should also take advantage of the views afforded by high structures.

**7.3.16** Care needs to be taken to ensure that tall buildings do not detract or otherwise negatively impact upon existing important structures, especially where the presence and prominence of these structures is key to the sense of place and legibility of an area. Increased prominence, scale and potential impact of the building also requires greater attention to architectural quality.

**7.3.17** Tall buildings are often conceptually associated with bulky developments, surrounded by inaccessible and underused spaces. This must be avoided and therefore proposals must achieve an appropriate level of permeability, contribute to a high quality public realm and integrate successfully with their surroundings.

**7.3.18** Due to their high visibility, tall buildings are likely to be as conspicuous (or more so) at night as during the day. Therefore consideration of their night time appearance is essential. Likewise, the potential intensity of the use means that the impact on the surrounding area (e.g. noise, light, vehicle movements) should be carefully managed, as should the elevated potential for shadowing and overlooking.

*Replacement of Existing Buildings:*

**7.3.19** The borough contains a number of existing tall buildings, many of which do not meet the requirements of this policy and have a negative impact on the quality of the surrounding environment. There may be a number of financial and other reasons that restrict the degree to which replacement buildings can achieve a reduction in height. The Council would not wish to prevent development that can improve both the quality of life of occupants and those in the surrounding area. However, the onus will be on the developer to demonstrate why a proposal should be an exception to any of the criteria in the above policy, and a reduction in height should be achieved in all cases where the location is inappropriate for tall buildings. All proposals for redevelopment must achieve a net positive impact on the quality of the environment and impact on the surrounding area. This may include, but is not limited to: improved urban design; better quality housing; improved public realm; the provision of community facilities; a better mix of uses; increased sustainability; and high quality architecture.

## 7.4 Heritage and built environment

DRAFT DMD 45

Preserving and Enhancing Heritage Assets:

## 7 Built Environment

- 1) Applications for development which fails to preserve and enhance the special interest, significance or setting of a heritage asset, (whether nationally designated, locally designated or not benefiting from a designation) will be refused.
- 2) In addition to the provisions of policy DRAFT DMD 1 'Achieving High Quality and Design-Led Development', development of, or affecting the setting of, heritage assets should seek to complement the asset in all aspects of their design, materials and detailing.
- 3) All applications affecting a heritage asset or its setting will be required to submit a Conservation Statement. The applicant will also be required to submit copies of the information gained from desk-based and on-site investigations to the Local Planning Authority, Historic Environment Record and English Heritage.

*This policy should be read in conjunction with Core Strategy policy 31.*

### Justification and guidance on implementation

- 7.4.1** Policy 31 of the Core Strategy defines what is meant by a *heritage asset*, importantly including locally designated assets, and sets out a requirement that development should preserve and enhance them.

#### Heritage Assets - seeking your views

The Core Strategy (2010) identifies the boroughs tangible heritage assets as including:

- 5 scheduled monuments and 1 local monument
- 22 areas of archaeological interest
- 451 statutorily listed and 93 locally listed buildings
- 21 conservation areas
- 5 nationally registered and 26 locally registered historic parks and gardens

Since the adoption of the Core Strategy English Heritage have reviewed the Areas of Archaeological Interest and changes are now proposed, as detailed in the Policies Map document which accompanies this draft DMD. 25 Areas of Archaeological Interest are now proposed.

No other changes are proposed to the list of assets at this stage.

- 7.4.2** Statutory lists are necessarily and rightly limited to those assets which are of national importance. However, while different criteria may be used in drawing up local lists, the value of the asset to the community and in creating a sense of place, is not necessarily any less. Equally national and local lists do not represent an exhaustive list of heritage assets, as evidenced by their frequent revision. Therefore, while the legislation associated with statutory lists may not apply to local and undesignated assets, the protection afforded by the above policy must.
- 7.4.3** The requirement to preserve *and* enhance is an important distinction from a requirement to preserve *or* enhance. This reflects the Council's belief that heritage assets almost always present opportunities to increase the value, quality and unique character of a development, in turn creating a stronger sense of place and improving people's quality of life. The Council believe that heritage assets play a key role in defining place and in building local pride, providing focal points and often spaces for recreation or for people to meet.

#### Assessment of Impact:

- 7.4.4** In evaluating the impact of a proposal, the Council will have regard to current best practice, guidance and relevant SPD. A list of useful references is included at the end of this section. The Council does not necessarily endorse all of the content therein.

## 7 Built Environment

- 7.4.5** Enhancement of a heritage asset can take many forms, including, but not limited to: restoration, repair, removal of inappropriate development, increasing access, increasing visibility, increasing the educational value, conversion to a more appropriate use or enhancement of the asset's setting. Only rarely will there be no opportunity for enhancement. On these occasions strong justification will need to be made through the design and access statement and developers will be expected to enter into a dialogue with the Council to examine how enhancement may be achieved.
- 7.4.6** Development affecting the significance of an asset may include, but is not limited to: the introduction of new structures/objects; alterations; complete or partial demolition; removal of buildings/features or parts thereof; the introduction of signage or advertisements; changes of use (including the use of open spaces); subdivision or fragmentation; changes to landscaping; the removal of built or landscape features or parts thereof; or any other form of development which fails to preserve and enhance the asset or its setting.
- 7.4.7** Replication and reference to the traditional characteristics of the asset may be appropriate in some instances. However, where uniform style is not necessary to preserve the significance of the asset (for example in a conservation area featuring development representing a number of ages and styles), a contemporary response that nevertheless respects aspects of the design, form and/or materials of the asset may be appropriate to provide a clear distinction between new and old. CABE, for example, recognise that appropriate contemporary design can positively enhance the character of heritage assets and suggests that general facadist or replica solutions should be discouraged, (CABE, making Design Policy Work, 2005).
- 7.4.8** Where development that may adversely impact an heritage asset is considered reasonable (for example where the asset is considered beyond economic or practicable repair; where the building or structure is incapable of beneficial use for its designed purpose, or of conversion to an appropriate new use; or where ancillary development is reasonably required in conjunction with a suitable use of that building), the net impact of the proposals must demonstrably preserve and enhance the heritage asset in all but exceptional circumstances.
- 7.4.9** Opportunities will be taken to secure comprehensive schemes for the repair, maintenance and future management of heritage assets in association with any development proposals through the use of planning conditions and obligations. This may include the removal of features which detract from the character or appearance of the asset.

### *Development Affecting the Setting of Heritage Assets:*

- 7.4.10** The setting of an asset is not limited to its curtilage and is defined as the physical and non physical environment in which the asset is experienced, including consideration of views to and from the asset, noise, dust and vibration, spatial associations and the historic relationship between places.
- 7.4.11** It is not possible to set out the spatial extent of areas within which development may impact upon heritage assets. The impact, whether positive or negative, will depend on a number of factors including, but not limited to, the scale and type of development proposed, the distance to and relationship with the asset, topography, viewing corridors, existing development and landscape features.
- 7.4.12** Therefore, the Council will assess on a case-by-case basis whether development that lies outside of a heritage asset's curtilage may have an impact upon that asset. Where an applicant believes there may be an impact, they are advised to contact the Council for pre-application advice.

### *Conservation Statements:*

- 7.4.13** The Council will not validate applications where the extent of the impact of the proposal on the significance of any heritage assets affected cannot adequately be understood from the application and supporting documents. The Conservation Statement should contain the information required to assess the impact of the proposals. More detailed requirements are set out in the Appendix on Conservation Statements.
- 7.4.14** A specific requirement of the conservation statement is to explicitly address issues raised in relevant character appraisals, management plans or other relevant evidence-based documents. This is included to give policy weight to the conclusions and recommendations of these documents. In particular, the

## 7 Built Environment

intention is to prevent incremental changes that, if viewed in isolation, would not necessarily result in refusal of a planning application, but that are having a cumulative and detrimental impact on heritage assets. In conjunction with the requirement to preserve and enhance heritage assets, this also allows reversal of changes that have occurred historically, or that fell outside of the development management process.

- 7.4.15** The requirement to explicitly address the issues raised within these documents also ensures that local issues are always at the forefront of decision-making, and that the most up-to-date information guides development management decisions. Trends, technology and cumulative impact of development of a particular type can mean that issues emerge and change over time. It is important that the Council can use its powers to tackle these issues as and when they become apparent. Documents such as conservation area character appraisals and management plans, which can be reviewed on a shorter timescale than DPDs, provide the most accurate assessment of the state of heritage assets.

### *Recording and Dissemination of Information:*

- 7.4.16** The policy also contains requirements for the recording and dissemination of information. Heritage assets contain information about our past which can be easily damaged and never replaced. They can also form important sources of education and help to foster community pride and identity. The importance of the appropriate recording and dissemination of information about heritage assets is therefore highlighted in the NPPF and it is important that this be implemented through the development management process.

### *Unknown Assets:*

- 7.4.17** It is important to note that, as a result of lack of information or awareness, many heritage assets remain undiscovered or without official recognition. The existence of an asset may become apparent as a result of a planning application, at which time Council may deem that it is appropriate to apply this policy.

### *Further Guidance:*

- 7.4.18** Applicants should also refer to Policies 7.8-7.10 of the London Plan.
- 7.4.19** The following organisations and publications may give further advice regarding development affecting heritage assets and/or their setting:
- English Heritage
  - The Design Council
  - The Society for the Protection of Ancient Buildings
  - The Georgian Group
  - The Victorian Society
  - The 20th Century Society
  - Greater London Archaeology Advisory Service (GLAAS)
  - English Heritage and CABI, 2001, *Building in Context: New Development in Historic Areas*, English Heritage and CABI, London.
  - A Charter for English Heritage Planning and Development Advisory Services, (2009) English Heritage.
  - English Heritage, 2011, *The Setting of Heritage Assets: English Heritage Guidance*, English Heritage

## 7 Built Environment

# Transport and Parking

## 8 Transport and Parking

# 8 Transport and Parking

## 8.1 Parking Standards

### DRAFT DMD 46

#### Parking Standards

##### 1. Car Parking

The Council will have regard to the range of maximum parking standards as set out in the London Plan and provided by way of reference in the Appendix on London Plan Car and Cycle Parking Standards, subject to:

- a. The public transport accessibility (PTAL) of the site; and
- b. Existing parking pressures; and
- c. The scale and nature of the development; and
- d. Accessibility to local amenities, and the needs of the future occupants of the developments in considering whether the level of car parking in proposed developments is appropriate and justified.

Where no formal standards exist evidence will be required to support the proposed level of parking. Car parking provision for each development will have regard to the following issues:

- e. For commercial development, ensuring both the operational requirements (hours of operation, shift patterns etc.) and operational parking needs are adequately met; and
- f. Access and amenity impact; and
- g. Road network capacity constraints; and
- h. Traffic flows; and
- i. The local character, environment and accessibility of the site; and
- j. Existing and planned public transport provision.

##### 2. Cycle and Powered Two Wheelers (P2W) Parking

New development should make provision for cyclists in accordance with the minimum standards provided by the London Plan and as set out in Appendix T1 and sufficient parking for Powered Two Wheelers (P2W). Development must provide secure parking to meet demand. Provision should be made in accessible locations with good natural surveillance, in safe and convenient locations which do not cause obstruction to other users.

##### 3. Parking Design

Parking design should not be considered in isolation of other design considerations. Detailed design dimensions are set out in Appendix 2 on Parking Design and Access Arrangements.

Car park surfaces requiring sustainable drainage systems (SUDS) must be used and designed to provide HGV access for the maintenance of the attenuation areas or soakaways.

Parking layouts should give consideration to location, proximity to accesses, sight lines and all manoeuvring requirements, including those for emergency and servicing vehicles. The need for turning facilities should generally be avoided by designing layouts with through routes. Vehicle turn-tables and car stackers are generally not supported.

##### 4. Loss of Parking

Where a proposal results in the loss of an existing or potential on or off street residential or commercial parking space, or access to them, planning permission will only be granted provided that sufficient replacement parking exists in the area to meet parking demand.

## 8 Transport and Parking

### 5. Limited Parking or Car Free Housing Development

Proposals for limited or no parking in high (5 -6) PTAL areas may be acceptable, provided the

Council is satisfied that this will not result in an increase in on-street parking pressure and would not adversely affect traffic flows, bus movement, road safety or the amenity of local residents or the local environment. Proposals for car free developments will be expected to:

- a. Still provide parking for disabled drivers and operational/servicing needs; and
- b. Be within a CPZ or contribute to the implementation of a CPZ where one does not currently exist, as long as this would not adversely impact on the amenity of residents and the interests of users of adjacent facilities and providing there is a strong prospect of introducing a new CPZ where one does not already exist; and
- c. Prohibit residents from obtaining CPZ resident parking permits, to be enforced by legal agreement; and
- d. Ensure that public transport infrastructure has sufficient capacity to accommodate increased demand as a consequence of the development.

### 6. Car Clubs

The Council will only consider proposals for car clubs which would support lower levels of off-street parking in new developments, (as well as being available to the wider public) in locations where schemes are viable, or where a development is in close proximity to existing car club bays.

*This policy should be read in conjunction with Core Strategy policy 24, London's London Housing Design Guide (2010), and have regard to English Partnerships 'Car Parking What Works Where' (2008), Manual for Streets and Manual for Streets 2.*

### **Justification and guidance on implementation**

- 8.1.1** It is essential that a design led approach is taken to the provision of parking if it is to function satisfactorily. Consideration must be given to parking and the design of access and parking areas for cars, cycles and service vehicles and its relationship to the built environment which it serves. Well planned and designed parking can have a determining influence on the successfulness of streetscape and can often influence appropriate development density. Providing creative, well-designed and accessible solutions to car parking and servicing within a housing and commercial developments is important to its success.
- 8.1.2** The Council's approach, in general, seeks to minimise car parking and to promote sustainable transport options. 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. The Mayor of London has also recognised the need for flexibility in applying the adopted London Plan Standards in different parts of London and is currently working with the Outer London Commission to review residential parking standards. As a starting point, the Council will apply maximum parking standards provided by the Parking Addendum of the London Plan and set out in the Appendix to the DMD. In the absence of standards in the table, the Council will be guided by national policy as set out in the National Planning Policy Framework, Section 4: Promoting Sustainable Transport; and Public Transport Accessibility Levels (PTALs) will also assist in assessing appropriate parking provision by measuring broad public transport accessibility levels. The levels provided by the PTAL index are relatively general and the amount and type of on-site parking on a particular site is to be agreed on an individual basis with the Council, informed by an understanding of existing provision and parking pressures in the area.
- 8.1.3** Parking areas and access ways should be paved in durable and serviceable materials. Permeable paving materials and integral drainage can be used to reduce surface run-off and prevent localised flooding. Loose materials, such as chippings, are not acceptable.
- 8.1.4** Residential garages are often used for other purposes, such as general storage. It is acknowledged that garages need to be large enough to accommodate a modern, family sized car and some storage.

## 8 Transport and Parking

- 8.1.5** The starting point for assessing parking provision for commercial development in town centres will be to assess the parking capacity within the wider context of the Town Centre to establish the levels required to serve development and the following will need to be satisfied:
- For major commercial developments within town centres demonstrate that the level of car parking would not adversely affect that centre or a neighbouring centre's vitality and viability.
  - For new major commercial developments within town centres parking provision to be shared where possible.
  - For public off street car parking achieve 'park mark' safer parking status.
  - For private off street car parking achieve 'secured by design' standard (or equivalent methodology).
  - For public off street parking, show it meets an essential need and enter into an agreement for a management scheme and pricing structure (including annual reviews) to deter commuter parking or alternatively, contribute to off site public parking provision.
- 8.1.6** For residential development, an adequate amount of off-street parking provision is required to meet adopted London Plan standards and avoid an increase in on-street parking. Parking standards should be appropriate to the location and character of the area and in relation to proximity to public transport and town centres, and the urban/semi-urban/suburban nature of the area.
- 8.1.7** The design of access and parking areas for cars, powered two wheelers, cycles and service vehicles is an integral part of new development. Providing creative, well-designed and accessible solutions to car parking and servicing within a housing development is important to its success, the enjoyment of future residents and has a direct influence on the street and the local environment.
- 8.1.8** It is also essential to recognise that conditions vary significantly in different parts of Borough. Some areas enjoy good public transport accessibility, and experience substantial pressure on available land. In contrast, some parts of the Borough have much less comprehensive public transport provision, and many experience much lower pressures for development. In view of this, a 'one size fits all' solution is not appropriate, and local issues around public transport accessibility and accessibility to facilities and services will need to be taken into account when applying these standards.

## 8.2 Vehicle Crossovers

### DRAFT DMD 47

#### Vehicle Crossovers and dropped kerbs

Planning Permission for vehicle crossovers and dropped kerbs that allow for off-street parking and access onto a classified road will only be granted where:

- a. It would not have a negative impact on the existing character of the area and street scene as a result of the loss of a front garden to hardstanding or loss of front garden walls; and
- b. It would not result in the loss of public greening such as street trees; and
- c. It does not give rise to further on street parking pressures by virtue of the loss of on-street parking alongside a dropped kerb; and
- d. Within CPZ areas, the on-street parking situation is not placed under additional pressure; and
- e. There is no adverse impact on road safety and congestion.

The Council as the Highway Authority produces Technical Guidance for assessing applications for residential vehicle crossovers to access off-street parking, which considers the issues outlined above, as well as:

- a. Any extenuating circumstances (e.g. blue badge holder);
- b. The on-street parking situation;
- c. Waiting restrictions;

## 8 Transport and Parking

- d. The ability to enter / exit in forward gear; and
- e. The availability or alternative rear/side access.

*This policy should be read in conjunction with Core Strategy policies 24 and 30.*

### Justification and guidance on implementation

- 8.2.1** The construction of a dropped kerb for vehicle access (also known as a crossover) is governed by the Highways Act 1980 and New Roads and Street Works Act 1991. Such construction is controlled, approved and licensed by the Council as the Highway Authority. Where such access is on and off a classified road then planning permission is required. Further considerations are set out in 'Parking Design and Access Arrangements.'
- 8.2.2** The pressure for off-street road parking continues to see applications for converting domestic front gardens into parking spaces, ultimately resulting in an aesthetic and environmental impact on the character of a street. This may be through various impacts such as the loss of green landscaping and natural drainage, street furniture, or traditional boundary features such as walls, hedges and garden gates.
- 8.2.3** The Council is concerned with the cumulative the loss of front gardens over time. In particular the suburban form and character of residential areas, and the additional pressure for kerbside parking spaces Further guidance which supports the value of cohesive character of residential streets in particular will come forward through the Enfield Design Guide.

### 8.3 Access and Servicing Development

#### DRAFT DMD 48

##### Access and Servicing

The detailed design of the overall layout of new development is not only essential to achieving its access and servicing needs but also vital to achieving a sustainable development of a quality character.

New development will only be permitted where the access and road junction which serves the development is appropriately sited and of an appropriate scale and configuration. Further considerations are set in the Appendix on Parking Design and Access Arrangements.

Where new accesses are proposed onto roads with a limit above 40mph then design standards within DMRB<sup>(3)</sup> shall apply. When new developments are served off roads with lower speed limits or lower category of roads within the network hierarchy, then reduced standards would normally apply with guidance being taken from Manual for Streets 1 & 2.

New access and servicing arrangements must ensure vehicles can reach the necessary loading, servicing, and parking areas. Layouts must achieve a safe, convenient and fully accessible environment for pedestrians and cyclists.

New development will only be permitted where adequate, safe and functional provision is made for:

1. Refuse collection (using 11.0m freighters) and any other service, and delivery vehicles required to serve part of the normal functioning of the development; and
2. Emergency services vehicles, (following guidance issued by the London Fire Brigade & Building Regulations); and

## 8 Transport and Parking

3. Operational needs for visitor and user “drop off” and “pick up” areas (e.g. for parents at nurseries and schools) as appropriate to the functioning of the development and the safety and free-flow of traffic.

Commercial development such as warehousing/logistic uses that can generate significant goods vehicle movements will only be permitted where it is located close to strategic or distributor roads, or rail heads/wharves on the River Lea Navigation, and make off-street provision for deliveries and servicing, with guidance being taken from Manual for Streets 1 & 2.

All development schemes must be designed to give priority to pedestrians. Particular attention should be given to achieving safety, pedestrian permeability, and the needs of cyclists. Other factors will come into play to lead to an attractive and safe development but seeking safety is paramount. The Enfield Design Guide will provide further guidance.

New highways should be built to adoptable design, construction, and safety standards. Should developers wish to have new roads adopted under Section 38 of The Highways Act 1980, then specific guidance is available separately. However the Council will not necessarily adopt all highway layouts and early advice should be sought.

*This policy should be read in conjunction with Core Strategy policies 24 and 27.*

### Justification and guidance on implementation

- 8.3.1** Most new development will require some degree of servicing whether this involves the pick up and delivery of goods, loading / unloading, refuse collection, and "drop -offs" based on the uses on the site eg. residential, industrial and commercial. Development proposals will need to ensure that appropriate space for servicing is integral to the development and design considerations at the outset. It will need to show there are not impacts on the safety of pedestrians, cyclists and other road users.
- 8.3.2** Enfield is largely residential in character and parking continues to be at a premium within both urban and suburban areas where both on and off street parking is limited. Proposals to alter front gardens to create car parking spaces will continue to be popular and will continue to place pressure on the character of the built environment. Where planning permission is required for a vehicle crossover, the Council will seek to enhance and protect local character and maintain adequate levels of private and public amenity.
- 8.3.3** To reduce any negative transport impacts of new development, proposals will need to demonstrate that enough space for servicing, circulation and access to, from and through the site is provided. Proposals will be examined to ensure appropriate service needs are met and that they do not unduly impact on surrounding properties. All developments must be fully accessible to pedestrians and assist with general permeability within an area.
- 8.3.4** The provision of access and the design of development in terms of the movement of people and vehicles are key considerations in assessing proposals. London Plan Policy 6.3 Assessing Effects of Development on Transport Capacity is clear on not allowing development, whether individually or cumulatively to place unacceptable pressure on the road network.

## 8 Transport and Parking

### 8.4 Assessing the Transport Implications of New Development

#### DRAFT DMD 49

##### Transport Assessments

- All major <sup>(4)</sup> development proposals should be accompanied by a Transport Assessment. For minor <sup>(5)</sup> developments a Transport Statement will be required. Indicative thresholds have been established by the Department for Transport. <sup>(6)</sup>
- In exceptional circumstances, where minor development would place pressure on the existing transport network, the Council will request a Transport Assessment in order to establish the transport implications of the development.
- In addition to the above the Council may request a Travel Plan for an occupier or site where the Transport Assessment or Transport Statement identifies the need to improve pedestrian accessibility, minimise congestion or reduce pollution.
- All Transport Assessments and Travel Plans should be produced in accordance with guidance from Transport for London <sup>(7)</sup>

*This policy should be read in conjunction with Core Strategy policy 24 and London Plan Policy 6.3*

#### Justification and guidance on implementation

- 8.4.1** The Council's approach in assessing new development will be to consider the impact of proposals on the existing transport capacity and transport network. National and regional guidance is focused on providing a sustainable and integrated transport network that provides a genuine alternative to the private car. Enhancements to public transport will have a key role, Core Policy 26 *Public Transport* of the Enfield Plan – Core Strategy commits to secure a comprehensive, safe, accessible, welcoming and efficient public transport network, capable of supporting the development proposals for the Borough and providing attractive alternative travel options by, amongst other things:
- ensuring new development can demonstrate that existing or proposed public transport levels can accommodate development proposals; and
  - where necessary, identify development opportunities for public transport improvements, or directly provide for new services.
- 8.4.2** Core Policy 25 *Pedestrians and Cyclists* sets out how the Council seeks to provide safe, convenient and accessible routes for pedestrians, cyclists and other non-motorised modes. Development will be expected to provide linkages and enhance permeability with and to the Borough's existing network of green infrastructure, including the Blue Ribbon Network, Greenway Cycle Routes, and wider public realm utilising Enfield's network of Green Chains.
- 8.4.3** Assessing the transport impact of new development is very important particularly in terms of the likely trip generation in relation to the impact on the existing transport network and the environment.
- 8.4.4** Travel Plans are expected to identify a package of practical mitigation measures and initiatives relating specifically to the needs of a development that provide a genuine alternative to private vehicle use and encourage walking, cycling and travel by public transport. Travel Plans should proactively encourage a change in travel behaviour using measures such as car clubs, car park management, penalty payments or restrictions, and any other measures that aid in minimising the number of trips taken by car, imposed through Travel Plans and secured and monitored via Section 106 agreements.

4 As defined in the Glossary

5 As defined in the Glossary

6 **Guidance of Transport Assessment 2007**

7 **Transport Assessment Best Practice Guidance (2010) and Travel Planning for new Development in London – incorporating deliveries and servicing (2011).**

## 8 Transport and Parking

# Tackling Climate Change

## 9 Tackling Climate Change

# 9 Tackling Climate Change

## 9.1 Our Low Carbon Future

### DRAFT DMD 50

#### Energy Efficiency Standards

In line with the Government's aim of promoting sustainable design and achieving Zero Carbon development as well as the targets contained within the London Plan, all developments will be required to demonstrate how the development has minimised energy-related CO<sub>2</sub> emissions in accordance with the following energy hierarchy:

- i. Maximising fabric energy efficiency and the benefits of passive design;
- ii. Utilising the potential for connection to an existing or proposed decentralised energy network in accordance with DRAFT DMD 51 'Decentralised Energy Networks';
- iii. Demonstrating the feasibility and use of low or zero carbon technology in accordance with **DRAFT DMD 52 'Low and Zero Carbon Technology'**; and, where applicable,
- iv. Financial contributions to on, near or off-site carbon reduction strategies in accordance with DRAFT DMD 53 'Allowable Solutions'

Measures to secure energy efficiencies and reduce the emissions of CO<sub>2</sub> must adhere strictly to the principles of the energy hierarchy with each tier utilised fully before a lower tier is employed. Developers must submit detailed Energy Statements in accordance with DRAFT DMD 3 'Sustainable Design and Construction Statements' to demonstrate how they have engaged with the energy hierarchy to maximise the energy efficiency of the proposal.

Specific targets for energy efficiency will apply to the following types of development:

#### A. Residential Development

In accordance with Policy 5.2 of the London Plan, the Council will require all major residential developments to achieve as a minimum:

- 25% reduction in Carbon Dioxide emissions over Part L1A of Building Regulations (2010) in line with best practice from 2010 to 2013;
- 40% improvement from 2013 to 2016; and
- Moving towards zero carbon from 2016

#### B. Non-residential proposals

The Council will require major non-residential development involving the replacement or creation of new non-residential floorspace or a combination thereof to achieve as a minimum:

- 25% reduction in Carbon Dioxide emissions over Part L2A of Building Regulation (2010) in line with best practice from 2010 to 2013;
- 40% improvement from 2013 to 2016;
- As per Building Regulations and
- Moving towards zero carbon from 2019

All of the reductions specified for residential and non-residential development above should be provided on-site. Where site constraints preclude attainment of the required reductions and/or the reductions are not technically feasible and this has been evidenced through the Energy Statement, in accordance with **DRAFT DMD 3 'Sustainable Design and Construction Statements'** provisions for providing near-site or off-site reductions through a set of agreed allowable solutions or financial contribution will be required to fully off-set the shortfall.

## 9 Tackling Climate Change

Consistent with the Spatial Vision for the borough and Strategic Objective 2 of the Core Strategy, in regeneration areas, where assessment indicates that it is technically feasible and economically viable to do so, the Council will require a higher level of energy efficiency to be achieved.

The Council recognises the importance of improving the energy performance of the existing residential and non-residential building stock and proposals involving refurbishment, extensions, fit out, conversion, or the change of use of an existing building that do not qualify for an assessment listed above will be required to achieve the highest standards of energy efficiency, and should seek to exceed relevant Building Regulations wherever possible and as demonstrated through their Energy Statements in accordance with **DRAFT DMD 3 'Sustainable Design and Construction Statements'** and Appendix on Sustainable Design and Construction Statements.

For minor development, the Council will seek to encourage all other residential or non-residential developments to achieve the above targets where it is demonstrated that this is technically feasible and economically viable.

In accordance with Policy 5.2 of the London Plan, developers will be required to take account of unregulated CO<sub>2</sub> emissions within their energy statements and will be required to reduce energy consumption for these uses so far as practicable. Specific targets for this will be agreed on a site by site basis and may inform further revisions to this document or be addressed as part of a later Supplementary Planning Document .

*This Policy should be read in conjunction with Core Policy 20 of the Core Strategy.*

### Justification and guidance on implementation

- 9.1.1** Policy 5.2 of the London Plan sets out targets for carbon dioxide reduction for both residential and non-residential development up to 2031 and forms the backbone of energy efficiency targets for the borough as a whole.
- 9.1.2** The Policy embeds the principles of the energy hierarchy (be lean, be clean, be green). By requiring strict adherence to the hierarchy and the policies within this document, developers will engage with the principles of energy efficiency from the ground up. This ensures that the structure of the energy policies serve to incentivise considered innovative design as the core value in delivering exemplar sustainable development in accordance with the Spatial Vision for Enfield and Strategic Objective 2 of the Core Strategy, while recognising the contribution that can be made in addressing the energy requirements for smaller development. Indeed, by reflecting the overarching strategic vision for the borough, the Policy goes further than the London Plan and instills a flexibility in the decision making process to seek further efficiencies and deliver exemplar developments within our regeneration areas.
- 9.1.3** The policy has been tested in the Renewable Energy and Low Carbon Development Study (2010) which has demonstrated that the proposed London Plan policy will deliver higher CO<sub>2</sub> savings and provides a greater incentive for developers to install on-site district heating infrastructure than a policy that simply defaults to building regulation compliance or small improvements upon it and is more flexible than the previous London Plan policy which tended to restrict developers to renewable forms of energy as a mechanism to achieve greater efficiencies at the expense of fabric energy efficiency.
- 9.1.4** Clear implementation and monitoring of the CO<sub>2</sub> reduction policy will be a priority and the policy has been designed to facilitate this. All relevant schemes will be expected to submit an Energy Statement demonstrating how they comply with the policy. Implementation of the target total CO<sub>2</sub> reduction level in any approved scheme should then be independently verified through nationally recognised, independently audited schemes, such as Energy Performance Certificates, the Code for Sustainable Homes (for new build residential developments) and BREEAM (for all other developments) and recorded by the relevant monitoring officer in Council. These figures, including a clear breakdown of the percentage of carbon savings delivered by fabric efficiency, connection to DEN, through the use of renewables and ultimately carbon offsetting, will feed into Enfield's Sustainability Programme.

## 9 Tackling Climate Change

- 9.1.5** Further mechanisms to secure improvements to existing stock within the borough not captured by the planning system include the carbon fund and allowable solutions. In the case of Allowable Solutions developers may identify near-site existing stock to upgrade as part of their mitigation package. Off-site mitigation is likely to be in the form of a one-off financial contribution calculated in accordance with the S106 SPD to fund off-setting schemes across the borough. The Council will publish a prescribed set of Allowable Solutions for delivery. Officers in consultation with other departments will need to ensure the measures proposed by the developer are consistent with this set of agreed solutions and are delivered by an agreed mechanism adopted by the Council.

### Decentralised Energy Generation

- 9.1.6** The Council is working closely with neighbouring authorities and other partners on the development of a decentralised energy network (DEN) for the Upper Lee Valley (ULV) and the potential for its expansion to other parts of the borough. A Pre Feasibility Study completed in 2011 shows that an extensive decentralised energy network in the ULV, potentially the largest in London, is both feasible and viable. Benefits of the network would include the provision of low carbon, low cost energy to homes and businesses in the area, helping to alleviate fuel poverty and attracting new businesses and jobs.
- 9.1.7** DE systems generally consist of communal, site-wide or district heating and cooling networks served by technologies such as combined heat and power (CHP) or combined cooling heat and power (CCHP) or boiler plants fuelled by gas, biomass or energy from waste technologies. DE systems have the potential to reduce carbon dioxide emissions from energy use in new and existing development. By generating low carbon heat and/or power at or near the point of use, DE networks at all scales make more efficient use of primary energy sources.
- 9.1.8** Although in the past DE networks have mainly been based around gas-fired CHP/CCHP or boiler plants, the future potential for DE networks fuelled by alternative renewable sources of energy such as biomass and energy from waste (EfW) technologies is becoming increasingly recognised. DE networks are flexible in that they allow for conventional energy technologies to be replaced by renewable sources as fossil fuels become less viable.
- 9.1.9** Having prior consideration to achieving the highest standards of energy efficient design and layout on-site in line with step 1 of the energy hierarchy, the Council will require developments to ensure that their proposals are designed to connect to and where appropriate, contribute towards, existing or planned DE networks, supplied by low or zero carbon energy in line with step 2 of the energy hierarchy.

### DRAFT DMD 51

#### Decentralised Energy Networks

- Proposals for the development of decentralised energy network infrastructure and related apparatus in the borough will be supported. The Council will support, and in some cases facilitate, the provision of infrastructure to support new and expanding networks including safeguarding routes and land for such use where necessary.
- Proposals for major developments which produce heat and/or energy should contribute to the supply of decentralised energy networks unless it can be demonstrated that this is not technically feasible or economically viable.

#### Connection to a decentralised energy network

All major developments should connect to or contribute towards existing or planned DE networks supplied by low or zero carbon energy

- Where the proposed development is adjacent to an existing DE network, it should:

## 9 Tackling Climate Change

- secure the direct connection of all units to that network; and
  - contribute as necessary to the increased capacity of the DE network to support such connection
2. Where there is an existing DE network that requires extension in order to supply the proposed development, proposed developments should:
    - contribute to such extension;
    - secure the direct connection of all units to the extended network; and
    - contribute as necessary to the increased capacity of the DE network to support such connection.
  3. Where there is a planned DE network within feasible and viable range of future connection, proposed developments should:
    - Commit to connect to the DE network;
    - Incorporate site-wide and/or communal heating systems;
    - Provide sufficient space for on-site energy centres or plant rooms to accommodate DE connection equipment such as pipes, heat exchangers and pumps etc
    - Locate the energy centre or plant room to ensure the shortest connection distance to the future network, having regard to the requirements of the network as a whole;
    - Maximise the layout, density and mix of development to support identified DE opportunities;
    - Provide pipe connections as appropriate to the site boundary or safeguard an identified route within the site for future DE connection infrastructure; and
    - Where the planned DE network requires extension to supply the proposed development, proposed developments should contribute to such extension.
  4. Where there is no connection available to a decentralised energy network and no DE network is planned within range on-site CCHP or CHP will be expected where the heating demand makes it feasible
  5. Where CCHP or CHP would not be technically feasible or financially viable, developments will be required to be designed to enable its connection to a decentralised energy network in the future, or provide a contribution for the expansion of decentralised energy networks, or other carbon reduction measures within the borough, where reasonable and appropriate.
  6. Where technically feasible, buildings with high cooling loads that are connected to a DE network should be designed to meet their cooling demand through heat-fed absorption chilling.

The Council will publish technical specifications to guide the design, capacity and location of CHP DH systems and energy centres on site to ensure that they interface with future DE networks.

### 9.1.10 Justification and guidance on implementation

**9.1.11** Decentralised energy generation is supported by national and regional planning policy as a means of meeting the requirements of the Climate Change Act to reduce carbon emissions by 80% on 1990 levels by 2050. The Mayor of London has set a target that 25% of heat and power used in London is to be generated through the use of localised decentralised energy systems by 2025. In order to achieve this target the Mayor prioritises the development of decentralised heating and cooling networks at the development and area wide level.

**9.1.12** The Core Strategy sets a framework to support appropriate measures to mitigate and adapt to the impacts of climate change. Core Policy 20 requires carbon dioxide emissions from developments to be minimised by following the steps of the energy hierarchy, particularly Step 2 which ensures that developments have done all they can to obtain an efficient supply of energy. The Council will expect developments to connect to a decentralised energy network unless it can be demonstrated it is not technically feasible or financially viable.

## 9 Tackling Climate Change

- 9.1.13** The Council and its partners has completed pre feasibility work to explore the potential of a commercially sustainable decentralised energy network which would put the Upper Lee Valley at the forefront of sustainable energy production in London and give it a clear competitive advantage over other areas. This work identified two immediate development opportunities that can be pursued in the Upper Lee Valley based on the strategic energy assets, including the incinerator at Edmonton Eco Park and heat from the proposed Kedco gasification plant. The ULV also benefits from major waste resources, significant regeneration activities, and a vibrant industrial corridor that hosts several significant users of energy.
- 9.1.14** The ULV DE Network has the potential to supply low carbon and low cost energy to 10,000 homes and 150 businesses through a 29km of network in the ULV boroughs (in Enfield, Haringey and Waltham Forest) with possible expansion to other parts of the borough where there are identified heat loads. It is expected that the route will be built in shorter sections over the next 5 to 15 years. A number of smaller viable local networks that would support development of the strategic heat network have also been identified in adjoining boroughs which are the subject of further investigation.
- 9.1.15** The Council will work with significant energy users, potential multi utility services (MUScos) or similar bodies to identify and develop DE networks.
- 9.1.16** There is potential to bring the network forward by means of a Local Development Order (LDO), which would grant permission for works comprising but not limited to pipes, heat exchange equipment and ancillary engineering works in the borough. Applicants intending to use a LDO would apply to the Council for prior approval, enabling delivery of the network to be monitored. In the meantime proposals would be subject to DMD Policy 51.
- 9.1.17** In determining whether a development is suitable to connect to a decentralised energy network or to include combine cooling, heat and power, the Council will consider the heat demand of the development and its proximity to a decentralised energy network as well as the feasibility and viability of connecting or including plant equipment. The Council will apply a general presumption that where the opportunity exists to generate heat on-site or to connect to a DE network, the latter will be sought in all cases unless it can be demonstrated that a significantly greater reduction in carbon emissions can be achieved by generating heat on-site, or connection to a network will have an adverse impact on the operation of the network.
- 9.1.18** A connection zone map indicating those areas where it is considered most feasible and viable to connect to the heat network will be published as part of the Feasibility Study for the DE network in the Upper Lee Valley. It will indicate development quanta and distance from the network within which developments could reasonably be required to connect. The criteria to guide which developments are suitable to connect to a decentralised energy network or to include combined heat and power will depend on the heat demand of the development and its proximity to a decentralised energy network as well as the feasibility and viability of connection. This Policy will be informed by the findings of the Feasibility Study.
- 9.1.19** In general, developments and areas with the following characteristics will be suitable for decentralised heat:
- High heating demand;
  - Mixed energy demands – including a range of heating and electricity demands throughout the day; and
  - Proximity to an existing or planned decentralised energy network – the location of existing and proposed networks can be found the London Heat Map [www.londonheatmap.org.uk](http://www.londonheatmap.org.uk)

### DRAFT DMD 52

#### Low and Zero Carbon Technology

All major development will be required to adhere to the principles of the energy hierarchy. Where developments have secured all possible savings through energy efficiency and decentralised energy networks and still fail to achieve the specified carbon dioxide reductions targets (DRAFT DMD 50 'Energy Efficiency Standards'),

## 9 Tackling Climate Change

developments will be required to provide on site renewable energy generation through the use of low and zero carbon technologies. Developments will be required to make-up the identified shortfall or provide a 20% carbon dioxide reduction, whichever is the greater unless it can be demonstrated that this is not technically feasible or economically viable.

For minor applications the Council will seek to encourage further carbon dioxide reductions through the provision and use of on site renewable energy generation through the use of low and zero carbon technologies.

Local opportunities to contribute towards decentralised energy supply from low and zero carbon technologies will be encouraged, where there is no overriding adverse local impact including identified impacts to historic assets.

However, where proposals are located within the green belt, elements of many low and zero carbon energy projects would constitute inappropriate development, which may impact on the openness of the green belt, the established character of the landscape or its biodiversity. In evaluating the development, the Council will give significant weight to the visual impacts of the project, the potential for disturbance to neighbouring properties and specific ecological considerations. Developers will need to demonstrate very special circumstances that clearly outweigh any harm by reason of inappropriateness and that there are no overriding local impacts for an application to be approved.

*This Policy should be read in conjunction with Core Policy 20 of the Core Strategy.*

### Justification and guidance on implementation

- 9.1.20** The use of low and zero carbon technologies can make a valuable contribution to curtailing carbon emissions at both the macro and micro scale, they are directly beneficial to the subject development, but also serve to decarbonise the grid through feeding back excess energy at times when the development has low energy demands. Indeed, as targets for energy efficiency become evermore demanding, it is unlikely that required savings can be secured by focusing on fabric efficiency alone and where connection to a Decentralised Energy Network is not feasible, the use of low and zero carbon technology will become standard practice in the medium to long term.
- 9.1.21** As the Renewable Energy and Low Carbon Development Study for Enfield evolves it is possible that areas suitable for large scale low and zero carbon installations are identified. While the Council will seek to encourage the provision of large scale systems, they will only generally be permitted where there is no overriding adverse local impact and are consistent with the Policies contained within the London Plan, the Core Strategy, this document or any future Local Plan documents. Where sites are identified as capable of accommodating large scale systems it is likely that they will be the subject of later development briefs, regeneration priority areas and energy masterplanning, or feed into relevant Area Action Plans.

### DRAFT DMD 53

#### Allowable Solutions

In accordance with Core Policy 20 and to facilitate the Government's aim of promoting sustainable design and achieving Zero Carbon development, from 2016 for residential development and 2019 for non-residential developments, the Local Planning Authority will require financial contributions from developers to off-set remaining carbon demands of development to achieve a 100% improvement over Part L of Building Regulations (2010) after all reasonable, technically feasible and economically viable measures have been utilised to minimise emissions from all development. The Council will publish a prescribed set of allowable solutions which best align with the strategic energy and climate change mitigation vision for the borough and represent the best use of the funding captured by the requirement in accordance with the following hierarchy:

- a. On-site options;

## 9 Tackling Climate Change

- b. Near-site options; and,
- c. Off-site options

Prior to these dates, where developers can demonstrate that the attainment of targets specified in DRAFT DMD 50 'Energy Efficiency Standards' are not technically feasible or economically viable, the Council will seek a financial contribution to off-set the identified short fall. This will be calculated on the basis an adopted price per tonne of carbon required to address any short fall.

The Council will set out requirements in the adopted Section 106 Guidelines, Community Infrastructure Levy Guidelines and will publish a prescribed set of Allowable Solutions as appropriate for developers to deliver borough-wide carbon off-setting targets and thresholds through later Supplementary Planning Documents.

*This Policy should be read in conjunction with Core Policy 20 of the Core Strategy.*

### Justification and guidance on implementation

- 9.1.22** The Climate Change Act (2008) set a legally binding target of at least an 80% cut in greenhouse gas emissions by 2050. Planning has a central role in achieving more sustainable development and achieving our reduction targets. Policy DRAFT DMD 50 'Energy Efficiency Standards' of this document and Policy 5.2 of the London Plan form the principal delivery mechanism for the Council to secure carbon savings within the borough and is required to be consistently applied to all schemes in the determination of planning applications. They set out targets for carbon dioxide reduction for both residential and non-residential development up to 2031.
- 9.1.23** The targets set are very challenging, particularly for energy thirsty non-domestic development. The construction industry will require a step change that departs radically from current building practice. However, it is recognised by government and industry experts that construction practice may be unable to keep pace with the ambitious targets imposed on developments to cut emissions and hence a degree of flexibility must be applied to achieve the strategic objectives, but also reflect technical and economic limitations of the development site. In this regard, a notion of 'Allowable Solutions' was born.
- 9.1.24** The idea of Allowable Solutions was first proposed by the Department of Communities and Local Government during 2008 as a way of providing flexibility for delivering zero carbon new development. Prior to that time, the industry was facing a definition (Zero Carbon) which required all carbon emissions to be mitigated on site. Although some flagship developments have been built, the cost of building to that definition and its impracticability on many sites, has reinforced earlier conclusions made by the UK Green Building Council and others, that delivering zero carbon through an entirely 'on site' strategy was not the right approach for mainstream development. Allowable Solutions offers a way out of that conundrum.
- 9.1.25** Whilst the principles of the energy hierarchy must be observed and the vast majority of savings will still be required on-site, provision has been made to secure cash-in-lieu contributions where it is clearly demonstrated that the specific targets cannot be fully achieved on site, any shortfall may be provided off-site.
- 9.1.26** It is recognised that the right framework for Allowable Solutions provides a platform for wider engagement with business and community, and presents opportunities for strong connections with both sustainability and localism. Any funds captured will be ringfenced and spent only on local measures that provide real and measurable reductions in carbon emissions. These can include, but are not limited to:
1. Retrofitting existing housing stock to be more energy efficient;
  2. Communal heating and CHP;
  3. Decentralised energy networks;
  4. Micro renewable energy generation;
  5. Upgrading existing building stock;

## 9 Tackling Climate Change

6. Upgrading energy consuming infrastructure (street lighting, electric vehicle charging points);
7. Potential landscape improvements where carbon benefits can be identified (tree planting etc)

**9.1.27** The Council is committed to publish a set of prescribed Allowable Solutions which best align with their strategic energy and climate change mitigation vision for their area, as determined within the Local Plan and the Climate Change Strategy. The Council will then take the responsibility and liability for ensuring that Allowable Solutions, which may be small, medium or large scale carbon-saving projects, deliver the required emissions reductions.

**9.1.28** With the adoption of the S106 SPD (November 2011), provision has been made within the document to secure financial contributions to offset carbon emissions. The developer's SAP calculations will identify the amount of carbon abatement required through Allowable Solutions.

### DRAFT DMD 54

#### Use of Roof Space

All developments (except householder applications) will be required to maximise the provision of green roofs and the greening of vertical surfaces as far as reasonably possible. New-build developments, and all major applications, are required to use all available roof space for green roofs, subject to technical and economic feasibility and other relevant planning considerations.

Major non-residential development involving the refurbishment, change of use, extension, replacement or creation of new non-residential floorspace or a combination thereof equal to or exceeding 1000sqm in strategic locations (including sites within Strategic Industrial Locations, Locally Significant Industrial Sites, Area Action Plans boundaries and enterprise zones) will be required to utilise the roof space of the development for low or zero carbon energy generation and/or living roofs/living walls or combination thereof commensurate with the size of the roof space as well as technical feasibility and economic viability.

Evidence demonstrating the feasibility of complying with this Policy shall form part of the sustainable design and construction statement. Where renewable technologies are proven to be feasible, developers are required to give due regard to the Energy Opportunities Plan (EOP) and Opportunity Area Planning Framework (OAPF) and to if possible feed into an existing or proposed DEN or district heating network.

*This Policy should be read in conjunction with Core Policies 20, 21 & 36 of the Core Strategy.*

#### Justification and guidance on implementation

**9.1.29** Enfield has some of the largest industrial areas within London contributing to London's vibrant economy. Ingrained within the Spatial Vision for Enfield the untapped potential of these areas can reach far beyond the confines of economic prosperity alone, they can make a critical contribution to *'exemplary, flagship quality, sustainable design and construction, designed to mitigate and adapt to the impact of climate change, embracing new environmental technologies'*. This Policy is designed to unleash this potential by reactivating and making vital the forgotten space suspended above our heads.

**9.1.30** The utilisation of vacant roof space can make an essential contribution to climate change consistent with the very principles that underpin the concept of sustainable development, but surprisingly remains a resource throughout London that is largely untapped and forgotten. A considered use of roof space can reap environmental dividends far beyond a traditionalist notion of shelter, it can be much more than that. Well designed roofs can realise the objectives of Policies throughout the Local Plan without undermining the viability of developments and represents a truly multi-benefit resource. Well designed roofs can:

- Provide habitats to enhance biodiversity (refer to **DRAFT DMD 78 'Nature Conservation'** and **DRAFT DMD 79 'Ecological Enhancements'**);

## 9 Tackling Climate Change

- Attenuate water run-off reducing the risk of flooding (refer to DRAFT DMD 58 'Avoiding and Reducing Flood Risk' and DRAFT DMD 60 'Sustainable Drainage Systems');
- Purify the water by removing key pollutants (refer to DRAFT DMD 60 'Sustainable Drainage Systems', DRAFT DMD 63 'Pollution Control and Assessment');
- Improve a building's thermal performance (refer to DRAFT DMD 50 'Energy Efficiency Standards');
- Contribute to greater energy efficiency (refer to DRAFT DMD 50 'Energy Efficiency Standards');
- Reduce maintenance burden;
- Reduce associated energy costs;
- Create viable and ultimately usable amenity provision enhancing the public realm (refer to DRAFT DMD 1 'Achieving High Quality and Design-Led Development');
- Counter the Urban Heat Island Effect (refer to DRAFT DMD 55 'Heating and Cooling');
- Attenuates noise (refer to DRAFT DMD 67 'Noise');
- Softens the impact of the built form (refer to DRAFT DMD 1 'Achieving High Quality and Design-Led Development' and DRAFT DMD 40 'The Design of Business Premises'); and,
- Creates appropriate areas for the installation of low and zero carbon technologies (refer to DRAFT DMD 52 'Low and Zero Carbon Technology').

**9.1.31** Consistent with the principles of DRAFT DMD 40 'The Design of Business Premises', regeneration and redevelopment opportunities which emerge as part of the wider consolidation and intensification of our industrial areas, offers the opportunity to maximise the contribution these developments make to the enhancement of the environment, but also introduce a degree of self sufficiency to businesses in terms of their energy production, driving down costs in the longer term and stimulating a vibrant and sustainable green economy.

**9.1.32** Living roofs and walls can offer a range of benefits to potential developments providing synergies with many of the strategic objectives contained within this document. It is estimated within the Mayors '*Living Roofs and Walls*' Technical Report that an extensive substrate based living roof can provide an average of 6kWh/m<sup>2</sup>/yr of potential energy savings (contributing to the principles of the energy hierarchy); can attenuate 0.025m<sup>3</sup>/m<sup>2</sup>/yr of rainwater held at roof level; can remove up to 95% of heavy metals from rainwater with a discernible reduction in nitrogen levels; through evaporation and evapotranspiration actively cools the air reducing Urban Heat Island Effect; and, can provide valuable habitats for a range of plant, invertebrate and bird species.

**9.1.33** In accordance, with Policy 5.11 of the London Plan, the Council will seek to maximise the provision of living roofs throughout the borough to all forms of development where it can be demonstrated through the sustainable design and construction statement that this is technically feasible and economically viable. It is the objective of this Policy that the feasibility and benefits of living roofs/walls are explored early on in the design process and are not considered as an 'bolt-on' but are embedded within the design of the scheme.

**9.1.34** Industrial and commercial processes are amongst the most energy thirsty forms of development accounting for 30% of Enfield's total CO<sub>2</sub> emissions per year. High heat demand within the Borough is concentrated around areas with high commercial, industrial activity and large public buildings within our strategic industrial core. To achieve objectives for reducing CO<sub>2</sub> emissions within the Borough, it is necessary to have a suite of Policies designed to tackle energy demands of industrial and commercial units to facilitate a step change in the way these buildings are designed to maximise their sustainable design and construction credentials.

## 9 Tackling Climate Change

- 9.1.35** It has been estimated that a total of 1,299,278.345m<sup>2</sup> of vacant and usable roof space<sup>(8)</sup> is currently available of existing commercial and industrial units across Enfield's Strategic Industrial Locations, Locally Significant Industrial Sites, Area Action Plans boundaries and main retail parks. Assuming the roofs are utilised for photovoltaics, on a model that sees 1 kWp generated by an 8 m<sup>2</sup> panel, to cover the full 1.3 million m<sup>2</sup> with this technology would require 162,500 panels producing an overall saving of 121.875 GWh per year or the equivalent of 52,406,250 tonnes of carbon.
- 9.1.36** In taking account of the thermal benefits of green roofs and assuming a rate of 6kWh/m<sup>2</sup>/yr of potential energy savings, 1.3 million m<sup>2</sup> would give an overall energy saving of 7,800 MWh per year or the equivalent of 3,354 tonnes of CO<sub>2</sub>. Further, when we take account of the water attenuation offered, if we are then to assume that 0.025m<sup>3</sup>/m<sup>2</sup>/yr of water could be held at roof level, then 1.3 million m<sup>2</sup> would have the capacity to store in the region of 32,500m<sup>3</sup> of rainwater at roof level, the equivalent of the volume of water needed for 13 Olympic sized swimming pools.
- 9.1.37** In biodiversity terms, extensive green roofs generally provide greater biodiversity interest than intensive roofs, but are considered to be less appropriate in providing amenity and recreation benefits, however, the nature of the use and the location of the development to key strategic industrial or commercial sites ensures that this form of green roof is the most appropriate particularly given the proximity of our principal industrial spine adjacent to Enfield's reservoirs and an area designated as a Site of Special Scientific Interest (SSSI). In this regard, the same area would provide 130 hectares of 'habitat', an area larger than Pymmes, Groveland, Broomfield and OakwoodParks combined or 182 international football pitches.
- 9.1.38** There is a perception that a building can either have green roofs or solar production at roof level but not both. However, it is possible to take a more pluralistic approach and use both technologies in tandem. Solar/Photovoltaic (PV) A-Frame panels at roof level are known to work more efficiently when installed on a green roof rather than a on a conventional surface. The green roof element not only saves energy during the summer time (see above) but can also increase efficiency of PV by reducing fluctuation of temperatures at roof level and by maintaining a more efficient microclimate around the PV Panels. Thus the strategic objective of the Policy sees a synergy of measures rather than viewing them in isolation of one another.
- 9.1.39** Green roofs are required to maximise benefits for biodiversity, sustainable drainage and cooling. Extensive green roofs provide the widest environmental benefits and therefore a presumption for this type of green roof should be adopted in all cases. Extensive green roofs are required to have a substrate depth of 75-150mm, unless it can be demonstrated that this is not reasonably possible. The substrate depth should be varied within this range to maximise biodiversity benefits.
- 9.1.40** The level of green roof provision will be assessed on a site-by-site basis, taking account of relevant plant installations, orientation, pitch and the function of the roof space. Other relevant planning considerations including heritage issues will inform negotiations with developers. Alternative types of green roofs may be appropriate where technical constraints or the need to provide viable amenity provision can be demonstrated. For further guidance on relevant technical considerations for installing living roofs or walls, officers should refer to the '*Living Roofs and Walls*' technical report which accompanies London Plan Policy 5.11. Where roof space is required for recreational use, the Council will adopt a presumption for the provision of intensive green roofs.
- 9.1.41** Not all roofs are capable of incorporating green roof or indeed low and zero carbon installations, due largely to locational constraints, design or orientation, however, the vast majority of developments are capable of accommodating the relevant installations if they are considered from the inception of the scheme. Technical constraints, including load bearing capabilities of the roof structure, can be 'designed out' of the final development. Through the sustainable design and construction statement developers are encouraged to engage with the feasibility of this Policy's requirements at the earliest possible stage in the design process. Where it is claimed that such installations are not technically feasible or

8 Defined for the purposes of capture from OS mastermap as: 'Buildings. Roofed constructions, usually walled. Includes permanent roofed constructions that exceed 8.0 m<sup>2</sup> in area (12 m<sup>2</sup> in private gardens). Exceptions are made for smaller buildings in such a detached position that they form relatively important topographical features. Mobile homes, residential caravans and so on are not captured. Storage tanks may be classified as buildings.'

## 9 Tackling Climate Change

economically viable, this must be clearly evidenced within the sustainable design and constructions statement, however, in achieving many of the Policies contained within this section, it is likely that the benefits of installing a green roof and/or low and zero carbon technologies are not mutually exclusive concepts and will go hand in hand with CO<sub>2</sub> reduction targets, water attenuation and flood risk Policies, as well as overarching ecological requirements. The viability of a scheme is unlikely to be greatly affected as a result of implementing this Policy given the interrelationships of the relevant sustainable design and construction principles and the targets featured in this document. Green/brown roofs and/or low and zero carbon technologies are likely to present design solutions to the targets contained within this document at a cost commensurate with carbon abatement schemes.

- 9.1.42** The use of solar thermal technologies can also contribute to district heating networks and connection to existing networks should be sought where an existing network has been identified.

### DRAFT DMD 55

#### Heating and Cooling

All new developments (excluding householder applications) will be required to demonstrate how the principles of passive design have informed the development process to control and manage heat gain and reduce the reliance on mechanical cooling.

Development proposals should reduce their reliance on mechanical cooling systems in accordance with the following hierarchy:

- a. The proposal has utilised passive design measures to minimise unwanted heat gain and manage incidental gains to reduce overheating in the summer months and the reduce need for heating in the winter, through orientation, daylighting, green roofs, air tightness, overshading, materials specification, managed thermal mass, construction and end-user operation;
- b. Passive or natural ventilation techniques have been employed to manage cooling, moisture and air change requirements;
- c. Where mechanical ventilation/cooling systems are required, development should be designed to include mixed mode ventilation and cooling in the first instance utilising low energy plant and heat recovery systems where appropriate.
- d. Where mixed mode ventilation/cooling is not appropriate and the development requires full mechanical ventilation/cooling, installed plant shall be (in order of preference) low energy or air conditioning. Heat recovery systems should be used where appropriate.

Measures to manage the heating and cooling demands of development must adhere strictly to the principles of the cooling hierarchy with each tier utilised fully before a lower tier is employed. Where mechanical ventilation/cooling plant is present in a scheme, evidence must be provided to demonstrate that the heating and cooling demands of the development cannot be met by alternative means.

Opportunities to adapt to existing buildings, places and spaces to manage heating and cooling demands must be maximised where practicable.

*This Policy should be read in conjunction with Core Policy 20 of the Core Strategy.*

#### Justification and guidance on implementation

- 9.1.43** The most recent data presented in the UK Climate Change Projections 2009 suggest that by the 2080s, the UK will see an average temperature rise of between 3.9 and 4.2 degrees. In urban locations with higher densities and a tight urban fabric, it is likely that such increases in temperature are intensified in comparison to more rural locations by a process known as Urban Heat Island Effect (UHIE). UHIE is caused by the reduction in green space through urbanisation and the large amount of hard surfaces

## 9 Tackling Climate Change

that are created as a result. Hard surfaces (including buildings and roads) provide high thermal mass by absorbing solar radiation during the day and in turn radiating it back to the atmosphere during the night. As temperatures rise due to climate change and more intense UHIE episodes are experienced, overheating in buildings in the summer months will become more of an acute problem and the demand for air-conditioning to cool spaces will increase, thereby increasing energy demand. Ensuring buildings are designed and constructed to be comfortable in higher temperatures, without resorting to energy intensive air conditioning, is a corner stone of climate change adaptation. By engaging with the principles of the cooling hierarchy, this Policy will require developments to incorporate measures which will ensure adaptation to rising summer temperatures, but in a way that will minimise energy intensive cooling strategies over the lifetime of the development.

- 9.1.44** Careful management of development can not only minimise the need for cooling in the summer months, but in winter can also serve to reduce the cost of heating. Poorly designed buildings exacerbate the need to artificially heat space to provide a comfortable environment. The sun is our planet's greatest source of energy and hence the embodied energy stored in the building fabric can be used to reduce the heat load of the development, reducing energy use and consequently reducing CO<sub>2</sub> emissions.
- 9.1.45** Indeed, with careful and considered design measures to address heating and cooling within development can be achieved without investing in expensive plant. In accordance with the principles of sustainable design and construction, all developments should maximise opportunities to incorporate passive solar design measures to minimise unwanted heat gain, to reduce the need for cooling in the summer months and the reduce need for heating in the winter. Through adhering to the principles of enhanced fabric energy efficiency, considered orientation, shading, end-user operation and the utilisation of livings roofs, demand for heating and cooling can be significantly reduced.
- 9.1.46** Developers are required to submit supporting evidence through their sustainable design and construction statement to demonstrate how the principles of the cooling hierarchy have been addressed within the proposal, including, where necessary, an explanation of how the hierarchy has influenced the evolution of the design to incorporate passive solar design methodologies. Consistent with urban design policies contained within this document, developers are encouraged to engage with the Local planning Authority at pre-application stage to establish a dialogue that will inform the layout and design of the scheme.

## 9.2 Responsible Sourcing of Materials, Waste Minimisation and Green Procurement

### DRAFT DMD 56

#### Responsible Sourcing of Materials, Waste Minimisation and Green Procurement

All major developments are required to ensure materials used in construction are responsibly sourced. As a minimum development will be required to achieve the following credits under the Materials category of the Code for Sustainable Homes and BREEAM:

- For residential schemes assessed under the Code for Sustainable Homes: a minimum of 10 out of 15 credits under MAT1; 3 out of 6 credits under MAT2; and 1 out of 3 credits under MAT3.
- For non-residential schemes assessed under relevant BREEAM document: a minimum of 3 out of 6 credits under MAT1; and, a minimum of 2 out of 3 credits under MAT3.

In addition 100% of timber used on the project must be is sourced in accordance with the UK Government's Timber Procurement Policy.

A Site Waste Management Plan will be required for all Major developments (and those defined under the Clean Neighbourhoods and Environment Act 2005) to accord with the requirements of Policy NLWP 6 of the North London Waste Plan and demonstrate procedures for the minimisation of construction waste consistent

## 9 Tackling Climate Change

with the principles of the waste hierarchy: reduce; reuse; recycle; recover. As a minimum, development will be required to divert at least 85% of non-hazardous waste by weight or volume from landfill with a strategic objective to divert a minimum of 95% of waste by weight or volume by 2020.

All major developments are required to include a Green Procurement and Construction Plan detailing how the development has sought to minimise the environmental impact of the scheme through responsible sourcing of materials, minimising construction site impacts, local procurement and employment strategies and the minimisation of construction and demolition waste. The Council will publish a set of guidance outlining how Green Procurement and Construction Plan's should be drafted.

The council is concerned with the waste generation of any new development, and as such will:

- Expect all developments to make appropriate provision (within individual units and as part of the overall development as appropriate) for waste storage, sorting and recycling, and adequate access for waste collection.
- Encourage non waste related development to provide on-site solutions for treating/managing waste generated by the development (i.e. composting, dedicated AD plants for food waste)

*This Policy should be read in conjunction with Core Policies 20, 22 & 32 of the Core Strategy and NLWP6 of the North London Waste Plan.*

### Justification and guidance on implementation

- 9.2.1** This Policy seeks to lower the environmental impact of materials over their life-cycle while addressing the wider impact of demolition and construction works. The construction industry uses about 420 million tonnes per annum of which only 10% is from recycled sources and less than 1% is reclaimed. The transport of materials in the construction industry alone accounts for 30% of road freight. The choice of materials used and the management of the construction process, therefore, plays a key role in delivering sustainable development. This includes the environmental impact of materials, the sourcing of materials, the use of recycled and reclaimed material as well as site waste management plans. In the utilisation of specific BREEAM and Code for Sustainable Homes issues to address these themes, the Policy seeks to instill a consistency of approach for development and the avoidance of duplication. In line with BRE best practice, the Policy seeks a minimum number of credits under specified issues all of which reflect current best practice and most importantly represents what is achievable with readily available materials and common construction methods. Indeed, targets for site waste management plans are consistent with the London average for diversion from landfill for demolition, excavation and construction waste, currently standing at 82% overall, with a strategic objective to achieve 95% diversion by 2020 as stipulated by Policy 5.18 of the London Plan.
- 9.2.2** The sustainable design and construction statement contains sections dedicated to materials and waste where developers are required to demonstrate how materials are being sourced and how waste from site is being dealt with for all developments. The level detail required will be commensurate with the scale and scope of the scheme.
- 9.2.3** For major developments, assessments under the Code for Sustainable Homes and BREEAM should be used to demonstrate compliance with credit targets above. This will form the basis of a condition in any consent.
- 9.2.4** Site Waste Management Plans (SWMP) are required by law for all developments where the construction costs reach £300,000 by virtue of the Clean Neighbourhoods and Environment Act 2005. Consistent with requirements set out in the North London Waste Plan, the submission of SWMPs will be a validation requirement in the determination of planning applications.
- 9.2.5** As part of the sustainable design and construction statement all developments will be required to submit a Green Procurement and Construction Plan. Minimum information requirements for the plan, which will encompass all of the requirements stated under this Policy, will be published as part of supplementary planning guidance drafted to align with the strategic objectives of the Climate Change Strategy.

## 9 Tackling Climate Change

### 9.3 Conserving water

#### DRAFT DMD 57

##### Water Efficiency

In accordance with Core Policy 21 and the objectives for water efficiency set out in the London Plan all new development will be required to maximise its water efficiency.

##### A. Residential Development

All new residential development including new build and conversions will be required to exceed a water efficiency of 105 litres/person/day.

Major housing proposals that result in the creation of 10 or more residential units or on sites of 0.5ha and above in the case of outline applications or major refurbishments of 10 or above units of existing housing stock will be required to exceed the following standards unless it can be demonstrated that it is not technically feasible to do so:

- 2011 to 2012 – 105 litres/person/day
- 2013 to 2015 – 90 litres/person/day
- 2016 onwards – 80 litres/person/day

For minor residential developments (comprising 1-9 units or on sites less than 0.5ha), the Council will seek to encourage greater water efficiency in line with the above targets where it is technically feasible and economically viable to do so.

##### B. Non Residential Development

The Council will require major non-residential development involving the extension, replacement or creation of new non-residential floorspace or a combination thereof will be required to exceed the following standards under WAT1 of BREEAM 2011 or equivalent rating/scheme if this is replaced or updated:

- 2011 to 2015 – Exceed a 12.5% improvement in water efficiency over notional baseline
- 2016 to 2018 – Exceed a 25% improvement in water efficiency over notional baseline
- 2019 onwards – Move towards 65% improvement in water efficiency over notional baseline

An assessment of the efficiency of the building's domestic water consuming components is undertaken using the BREEAM Wat 01 calculator. The water consumption (litres/person/day) for the assessed building is compared against a notional baseline performance.

In addition, the Council will seek to encourage the inclusion of rainwater collection and greywater recycling. All new major developments with a floor-space over 1000m<sup>2</sup> or residential dwellings either numbering 10 or more or being developed on a site having an area of 0.5 hectares or more, should undertake a rainwater and greywater use feasibility study. Where collecting and reusing water is feasible, it should be included in the proposed development.

For all other developments including changes of use, conversions, extensions and refurbishments captured by the planning process, the highest level of water efficiency will be sought.

*This Policy should be read in conjunction with Core Policy 21.*

## 9 Tackling Climate Change

### Justification and guidance on implementation

- 9.3.1** Information taken from the Environment Agency's publication '*Areas of Water Stress: Final Document*' (2007) indicates that the London Borough of Enfield has been identified as an area of serious water stress. The assessment considered the current per capita demand for water, forecast growth in per capita demand for water, forecast population growth, current water resource availability and forecast resource availability and concluded that a combination of these factors conspire to severely increase the pressures on water resources in the borough to the extent where our demand for water exceeds supply. The major water sources that supply the borough are the River Lee, River Thames and the Chalk aquifer beneath the London Clay. The public water supply sources in the Lower Thames and Lee Rivers make up 79% of total freshwater abstracted in London. The water resource status of these major water sources indicate that the sources are already 'over abstracted'.
- 9.3.2** Residents within the borough consume 166 litres of water per person per day, significantly more than the national average (146 litres/person/day), such levels of consumption are already unsustainable, but with increased population forecasts, additional growth in housing and non-residential floorspace will place significant additional pressure on already scarce water resources. Moreover, with the onset of climatic change, future rainfall is expected to become more seasonal, with more rainfall falling in winter (up to 30 per cent more by 2080s) and less in summer (up to 50 per cent less by 2080s). Although the annual average volume of precipitation is not expected to decrease, it will fall less evenly throughout the year than currently experienced, with a greater proportion falling in intense downpour events, leading to increased flooding, but also more frequent and longer dry periods where the borough will be forced to rely on reservoirs to meet our needs and exacerbating water stress.
- 9.3.3** This Policy seeks to set challenging, but ultimately achievable standards for water efficiency within development commensurate with mandatory requirements required to comply with our targets for development under the Code for Sustainable Homes and BREEAM. Based on research conducted by the Environment Agency<sup>(9)</sup> the targets for residential development can be achieved without incurring significant additional costs. Consistent with Policy 5.15 of the London Plan and the Climate Change Strategy, the Council is committed to explore the concept of 'water neutrality' and this Policy seeks to encourage the developments to utilise rain and grey water harvesting systems as alternative water sources to reduce consumption.
- 9.3.4** Developers for all planning applications will be required to demonstrate, through the Sustainable Design and Construction Statement that all measures have been taken to reduce the consumption of mains potable water through the use of water efficient fittings, flow restrictors, efficient appliances and water recycling/harvesting systems where feasible. In addition major development will be required to submit relevant water consumption calculations as required by the Code for Sustainable Homes and BREEAM.
- 9.3.5** As developments push toward 80 litre/person/day it is likely that water harvesting systems will be required. However, for Code Level 5 & 6 schemes, 80 litres/person/day is a mandatory standard and hence where DRAFT DMD 4 'Environmental Assessment Methods' requires this Code Level in the delivery of residential developments, this Policy is satisfied by default. Where a development fails in this respect, the development will be unable to demonstrate compliance with these relevant Policies and hence compensatory provision or financial contributions will be sought.
- 9.3.6** The Council will update and review water efficiency targets as appropriate over the plan period.

## 9 Tackling Climate Change

### 9.4 Flood Risk

#### DRAFT DMD 58

##### Avoiding and Reducing Flood Risk

- 1) Developments must avoid and reduce the risk of flooding, and not increase the risks elsewhere by:
- a. Locating developments within areas of lower flood risk through the application of the Sequential Test. An Exception test will also be required in line with the following table.

Table 9.1

Flood Risk Vulnerability classification		Essential Infrastructure	Water compatible	Highly Vulnerable	More Vulnerable	Less Vulnerable
Flood Zone	Zone 1	Y	Y	Y	Y	Y
	Zone 2	Y	Y	Exception Test required	Y	Y
	Zone 3a	Exception Test required	Y	N	Exception Test required	Y
	Zone 3b	Exception Test required	Y	N	N	N

Key: Y - Development is appropriate, N - Development is not appropriate

The risk associated with other types of flooding will be assessed in line with DRAFT DMD 59: Assessing Flood Risk.

- b. Preserving overland flood flow routes, where applicable;
- c. Ensuring there is no net loss of flood storage on site, or in exceptional circumstances, providing adequate off site compensatory storage;
- d. Implementing Sustainable Drainage Systems (SUDS) as part of all development to reduce the rate of run off in line with DRAFT DMD 60 'Sustainable Drainage Systems';
- e. Preventing the loss of permeable surfaces/areas of soft landscaping, and maximising the use of green infrastructure as a potential sources of flood storage;
- f. Ensuring that proposals in flood risk areas, where they are required to, satisfy the Sequential and Exception tests; and actively manage and reduce flood risk by applying the sequential approach at the site level; where possible, reducing the footprint of existing buildings; making sure the development is safe; incorporating flood resilient/resistant design and flood mitigation measures); and,
- g. Ensuring that proposals in flood risk areas are supported by a site specific Flood Risk Assessment (FRA) in line with DRAFT DMD 59: Assessing Flood Risk. These FRAs must provide evidence to demonstrate that the development will meet the relevant tests, will can be classed as safe (see paragraph 9.4.26), and where possible will reduce flood risk;

In consultation with the Environment Agency, planning permission will only be granted for proposals which have addressed all sources of flood risk and would not be subject to, or result in, unacceptable levels of flood risk.

## 9 Tackling Climate Change

*This policy should be read in conjunction with Core Strategy policy 28*

### Justification and guidance on implementation

- 9.4.1** Enfield contains more waterways than any other London borough, and also has large artificial water bodies, such as the New River and the William Girling and King George's reservoirs. These act as a valuable asset for the Borough, providing water resources for London, opportunities for sport, recreation and leisure, access to nature, a historical reference, and an attractive setting. However, they also represent sources of flood risk in Enfield, posing a potential threat to life and property which needs to be pro-actively managed.
- 9.4.2** The underlying pattern of geology and the effects of urbanisation mean that the Borough is also susceptible to incidents of surface water and groundwater flooding. Projections for future climate change indicate that there is likely to be more frequent short duration, high intensity rainfall and more frequent periods of long duration rainfall. These changes would have implications for flood risk, which need to be considered in order to future proof developments. Although flooding cannot be wholly prevented, its impacts can be alleviated through good planning and management, and this chapter aims to ensure that all developments, through their location, layout and design, have taken the current and future impacts of flood risk fully into account.
- 9.4.3** The Enfield Strategic Flood Risk Assessment (SFRA) Level 1 (2008) and Surface Water Management Plan (SWMP) provide evidence of areas of the borough currently at risk from flooding, however, climate change is likely to lead to increased and new risks of flooding. For the purposes of the policies in this section, flood risk areas are defined as Flood Zones 2 and 3 (for sources of fluvial flooding), and areas identified as being at risk from groundwater and surface water flooding in the SFRA and SWMP. In line with recommendations in the SFRA, as part of a risk based approach, development will first be expected to avoid flood risk areas (i.e. for fluvial flood risk, be directed to flood zone 1) so that the risks of flooding to new development can be minimised as far as possible. All development except for minor development<sup>(10)</sup> must demonstrate that they have done this by applying the principles of the Sequential Test when selecting development sites, and the Exception test where necessary. Preference is given to flood zone 1. Only if there are no reasonably available sites in flood zone 1, will the flood vulnerability of the proposed development be taken into account in locating in flood zone 2 and then flood zone 3. The risk associated with other types of flooding will be assessed in line with DRAFT DMD 59: Assessing Flood Risk.

### Flood Risk Vulnerability Classification (source: PPS25/NPPF)

Table 9.2 Flood Risk Vulnerability Classification

Essential Infrastructure	<ul style="list-style-type: none"> <li>• Essential transport infrastructure (including mass evacuation routes) which has to cross the area at risk.</li> <li>• Essential utility infrastructure which has to be located in a flood risk area for operational reasons, including electricity generating power stations and grid and primary substations; and water treatment works that need to remain operational in times of flood.</li> <li>• Wind turbines.</li> </ul>
Highly Vulnerable	<ul style="list-style-type: none"> <li>• Police stations, Ambulance stations and Fire stations and Command Centres and telecommunications installations required to be operational during flooding.</li> </ul>

<sup>10</sup> Definition of minor development - Minor non-residential extensions: Industrial/Commercial/Leisure etc. extensions with a footprint less than 250 m<sup>2</sup>. Alterations: development that does not increase the size of buildings e.g. alterations to external appearance 'Householder' development: e.g. sheds, garages, games rooms etc. within the curtilage of the existing dwelling in addition to physical extensions to the existing dwelling itself. This definition EXCLUDES any proposed development that would create a separate dwelling within the curtilage of the existing dwelling e.g. subdivision of houses into flats.

## 9 Tackling Climate Change

	<ul style="list-style-type: none"> <li>• Emergency dispersal points.</li> <li>• Basement dwellings.</li> <li>• Caravans, mobile homes and park homes intended for permanent residential use.</li> <li>• Installations requiring hazardous substances consent <sup>(11)</sup> (Where there is a demonstrable need to locate such installations for bulk storage of materials with port or other similar facilities, or such installations with energy infrastructure or carbon capture and storage installations, that require coastal or water-side locations, or need to be located in other high flood risk areas, in these instances the facilities should be classified as 'Essential Infrastructure').<sup>(12)</sup></li> </ul>
More Vulnerable	<ul style="list-style-type: none"> <li>• Hospitals.</li> <li>• Residential institutions such as residential care homes, children's homes, social services homes, prisons and hostels.</li> <li>• Buildings used for: dwelling houses; student halls of residence; drinking establishments; nightclubs; and hotels.</li> <li>• Non-residential uses for health services, nurseries and educational establishments.</li> <li>• Landfill and sites used for waste management facilities for hazardous waste <sup>(13)</sup></li> <li>• Sites used for holiday or short-let caravans and camping, <b>subject to a specific warning and evacuation plan.</b></li> </ul>
Less Vulnerable	<ul style="list-style-type: none"> <li>• Police, ambulance and fire stations which are <b>not</b> required to be operational during flooding.</li> <li>• Buildings used for: shops; financial, professional and other services; restaurants and cafes; hot food takeaways; offices; general industry; storage and distribution; non-residential institutions not included in 'more vulnerable'; and assembly and leisure.</li> <li>• Land and buildings used for agriculture and forestry.</li> <li>• Waste treatment (except landfill and hazardous waste facilities).</li> <li>• Minerals working and processing (except for sand and gravel working).</li> </ul> <p>Water treatment works which do <b>not</b> need to remain operational during times of flood.</p> <ul style="list-style-type: none"> <li>• Sewage treatment works (if adequate measures to control pollution and manage sewage during flooding events are in place).</li> </ul>
Water-compatible Development	<ul style="list-style-type: none"> <li>• Flood control infrastructure.</li> <li>• Water transmission infrastructure and pumping stations.</li> <li>• Sewage transmission infrastructure and pumping stations.</li> <li>• Sand and gravel workings.</li> <li>• Docks, marinas and wharves.</li> <li>• Navigation facilities.</li> <li>• MOD defence installations.</li> <li>• Ship building, repairing and dismantling, dockside fish processing and refrigeration and compatible activities requiring a waterside location.</li> <li>• Water-based recreation (excluding sleeping accommodation).</li> </ul>

11 See Circular 04/00: *Planning controls for hazardous substances* (paragraph 18) at: [www.communities.gov.uk/publications/planningandbuilding/circularplanningcontrols](http://www.communities.gov.uk/publications/planningandbuilding/circularplanningcontrols).

12 In considering any development proposal for such an installation, local planning authorities should have regard to Planning Policy Statement 23, '*Planning and Pollution Control*'.

13 See *Planning for Sustainable Waste Management: Companion Guide to Planning Policy Statement 10* for definition [www.communities.gov.uk/index.asp?id=1500757](http://www.communities.gov.uk/index.asp?id=1500757).

## 9 Tackling Climate Change

- Lifeguard and coastguard stations.
- Amenity open space, nature conservation and biodiversity, outdoor sports and recreation and essential facilities such as changing rooms.
- Essential ancillary sleeping or residential accommodation for staff required by uses in this category, **subject to a specific warning and evacuation plan.**

### Notes:

1) This classification is based partly on Defra/Environment Agency research on Flood Risks to People (FD2321/TR2) <sup>(14)</sup> and also on the need of some uses to keep functioning during flooding.

2) Buildings that combine a mixture of uses should be placed into the higher of the relevant classes of flood risk sensitivity. Developments that allow uses to be distributed over the site may fall within several classes of flood risk sensitivity.

3) The impact of a flood on the particular uses identified within this flood risk vulnerability classification will vary within each vulnerability class. Therefore, the flood risk management infrastructure and other risk mitigation measures needed to ensure the development is safe may differ between uses within a particular vulnerability classification.

### Flood Risk Maps

Up-to-date maps showing fluvial flood risk can be found at <http://www.environment-agency.gov.uk>

In addition, the Council has undertaken further work through the preparation of its Strategic Flood Risk Assessment and Surface Water Management Plan, to identify areas at risk from surface water and ground water flooding, and from other sources. Relevant maps are shown in the Policies Map document which accompanies this draft DMD.

**9.4.4** The Core Strategy includes strategic land allocations in the form of Area Action Plan (AAP) and Regeneration Priority Areas. They propose a range of land uses including housing, employment, community/social facilities, open space, leisure and recreation. Parts of Central Leaside and North East Enfield AAPs lie within flood risk areas. The Core Strategy supports the principle of development on sites in these AAP areas which contribute to the strategic objectives for change in the Upper Lee Valley. The Core Strategy also encourages the redevelopment and intensification of existing industrial sites within the strategic industrial locations, many of which are also in flood risk areas. It is acknowledged that there are no opportunities to re-locate existing industrial uses to areas of lower risk and there is significant financial capital and embodied energy invested in existing infrastructure, therefore any new development needs to reduce flood risk overall.

**9.4.5** Given that there are certain circumstances where development can be justified in flood risk areas, a thorough understanding of this risk is necessary to make sure that the development addresses the risk and the building and any occupiers would remain safe. The SFRA recommends that developments in areas at risk from flooding should be accompanied by site specific flood risk assessments. The FRAs must have regard to evidence, such as the Strategic Flood Risk Assessment (SFRA) Level 1 (2008), a more detailed SFRA Level 2, and Surface Water Management Plan (SWMP). The SFRA appraises the risk of flooding from the following sources: fluvial, groundwater, surface water, sewer, reservoir and the New River, and mapped areas of the Borough which are at risk. When using the SFRA, developers should also refer to the Environment Agency maps to ensure they are using the most up to date maps. The emerging Surface Water Management Plan explores in more detail, through the use of modelling, the pattern of surface water flooding which could occur as a result of heavy rainfall. More detail on when a FRA is required and their content is given below. Developers are encouraged to discuss their proposals and their FRA with the Council and Environment Agency before submitting an application.

## 9 Tackling Climate Change

### DRAFT DMD 59

#### Assessing Flood Risk

##### 1) Requirements for a site specific Flood Risk Assessment

Site specific Flood Risk Assessments will be required for the following:

- a. Development proposals of 1 hectare or greater in Flood Zone 1;
- b. All proposals for new development located in Flood Zones 2 and 3; and
- c. All proposals in groundwater flood risk areas that involve the creation of useable space below ground;
- d. All proposals for new development identified as being at risk from surface water flooding in the SWMP; or
- e. Any development that may be subject to other sources of flooding identified in subsequent reviews/updates of the evidence base on flooding.

These FRAs must:

- f. As a minimum, satisfy the requirements for a FRA set out in the SFRA and DMD (see appendix);
- g. Where applicable, provide evidence so that the Council can assess whether the requirements of the sequential test of sites across the borough are met, and where an exception test is required, demonstrate that:
  - the development would provide wider sustainability benefits to the community that outweigh flood risk
  - the development is on developable previously-developed land or, if this is not the case, that there are no reasonable alternative sites on developable previously-developed land; and
  - the development will be safe (see paragraph 9.2.24), without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.

Evidence to satisfy these tests must be provided unless it can be demonstrated that they have already been met through the Local Plan process.

- h. Where applicable, demonstrate that development within individual sites (including location, layout and design) is directed in accordance with a sequential approach away from areas of higher risk, and match the flood vulnerability of the intended use to the level of flood risk.

##### 2) Additional requirements for non fluvial flooding

Where developments are proposed in areas identified as being at risk of groundwater flooding, consideration should be given to prevention or mitigation measures and the Council may require developers to submit further details to determine the extent of risk and the requirements for mitigation.

Developments at risk of flooding need to make sure they are safe and incorporate appropriate mitigation measures in line DRAFT DMD 60 'Sustainable Drainage Systems', DRAFT DMD 61 'Flood Control and Mitigation Measures' and DRAFT DMD 62 'Protection of watercourses and flood defences'.

*This policy should be read in conjunction with Core Strategy policy 28.*

## 9 Tackling Climate Change

### Justification and guidance on implementation

- 9.4.6** The SFRA recommends that site specific FRAs be carried out in areas of flood risk, these will help to assess the level of risk to and from the new development. As a minimum, the FRA must satisfy the requirements set out in the SFRA and DMD (see appendix). The level of information required will be dependent on the nature and scale of the development. The FRAs must refer to local evidence which identifies local flood risk including the SFRA and SWMP.
- 9.4.7** Applying the sequential test and exception tests is required by NPPF, this will help to direct development to the lowest risk areas unless there is a clear justification or an alternative higher risk location. The Core Strategy high level sequential test provides justification for steering new development towards the AAP strategic growth areas. The sequential and, where necessary, the exception test will be applied to specific development sites/proposals allocated through the AAPs, therefore these requirements may already be met as part of this process. However, even if this is applicable, developments would still be required to pass part c) of the Exception Test. Where development occurs which is not in accordance with sequential or exception tested policies/allocations/proposals in DPDs they will be required to provide sufficient evidence to pass these tests.
- 9.4.8** Where the Sequential Test shows that there are no suitable available alternative sites in lower flood risk areas and development is required, the sequential approach should be applied within the development site to locate the most vulnerable elements of a development in the lowest risk parts of the site.
- 9.4.9** The SFRA and SWMP maps indicative groundwater flood risk areas; these have emerged from a broad scale analysis and provide an indication of where ground water flooding may be an issue. The indicative risk area is based largely on geological data and shows the extent of the strata across Enfield that are considered capable of carrying significant quantities of water and therefore creating a potential risk of groundwater flooding.
- 9.4.10** The indicative risk area does not necessarily represent a fixed flood outline, as this is dependent on local variations such as topography, geology and soils. For example, groundwater emerging at the surface may simply runoff to pond in lower areas, so areas beyond the indicative groundwater flood risk area may be vulnerable and those within it may not experience flooding. Therefore, the groundwater maps should be read in conjunction with the surface water mapping, to identify those areas where groundwater may emerge and the major flow pathways that water would take. Despite the coverage of the indicative risk area, the overall risk and consequences of groundwater flooding in Enfield is low.
- 9.4.11** The risks are low and therefore should be managed appropriately according to the level of risk. The SFRA recommends that only developments proposed in groundwater flood risk areas that involve the creation of useable space below ground require a FRA. If they do not involve the creation of useable space, mitigation measures are recommended.
- 9.4.12** The Surface Water Management Plan (SWMP) examines multiple sources of flood risk and models different rainfall scenarios to determine the causes and consequences of surface water flooding in Enfield. The SWMP provides an indication of key overland flow paths/routes, water velocities and areas where surface water flooding is likely to occur. The results of this modelling have been used to identify Critical Drainage Areas (CDA) (see appendix - Critical Drainage Areas). CDAs are catchment areas which influence the predicted surface water flood extent and each one identified has areas within it at significant risk of surface water flooding. There are also areas outside of the CDAs where there is a risk of surface water flooding, but there is little or no development affected and, therefore, the impact/consequences of flooding is lower. However, any future development in these areas is likely to be affected by surface water flooding, and, therefore, its potential vulnerability to and the risks associated with flooding must also be considered.

*Requirements for a site specific Flood Risk Assessment*

## 9 Tackling Climate Change

- 9.4.13** The FRA must meet the minimum requirements in the SFRA and DMD (see appendix) and, for groundwater flood risk areas, any additional requirements set out in the paragraph below. The FRA must, having regard to the Environment Agency Flood Maps, Strategic Flood Risk Assessment, Preliminary Flood Risk Assessment/Local Flood Risk Management Strategy, Surface Water Management Plan and any other relevant evidence, specifically address the following:
- a. Identify whether the proposed development is likely to be affected by current or future flooding from any source;
  - b. Identify whether the proposed development will increase flood risk elsewhere;
  - c. Demonstrate how flood risks identified will be managed (in terms of proposed mitigation measures) and how the development will be safe over its lifetime, taking into account climate change;
  - d. Identify opportunities as part of developments to reduce the probability and consequences of flooding (by creating flood storage, preserving flood pathways, reducing the existing footprint of buildings in flood risk areas, reducing surface water run off);
  - e. Where applicable, provide evidence so that the Council can assess whether the requirements of the sequential test are met and demonstrate that the exception test can be passed, unless these tests have already been met through the Local Plan process; and
  - f. Where applicable, demonstrate that a sequential approach (including location, layout and design) has been used to direct development away from areas of higher risk within individual sites, and to match the flood vulnerability of the intended use to the level of flood risk.
- 9.4.14** The Environment Agency should be consulted on site specific Flood Risk Assessments (FRA) in line with their standing advice.

### *Requirements for a Ground Water Flood Risk Assessment*

- 9.4.15** For developments in groundwater flood risk areas that involve the creation of useable space below ground, such as basement dwellings or underground car parks a groundwater Flood Risk Assessment must be produced, this should include the following tasks as a minimum:
- on-site conditions should be assessed during a site walkover (for example, the type and distribution of vegetation can indicate areas prone to water logging);
  - geological maps should be reviewed to assess the hydrogeological characteristics of the site, available from the British Geological Survey;
  - consultation should be undertaken with the British Geological Survey, the Environment Agency and Thames Water to obtain the following: water levels in boreholes, recorded flood levels, records of flows from springs, groundwater flood maps and photographs of ground water flood events;
  - local residents should also be consulted in order to develop a full understanding of any historical groundwater flooding events;
- 9.4.16** Depending on the scale of the development, if the above assessment indicates that groundwater flooding is likely, a more detailed appraisal may be necessary. This could include drilling trial boreholes to ascertain the depth of the water table and monitoring to determine its seasonal fluctuations. The possible impact of the development on groundwater levels and flows must also be assessed.

### **DRAFT DMD 60**

#### **Sustainable Drainage Systems**

All developments must incorporate, and retrofit where possible, SuDS which meet the following requirements:

##### **1) Suitability**

## 9 Tackling Climate Change

- a. Ensure the SuDS measure(s) are appropriate having regard to the proposed use of site, site conditions/context (including proximity to source protection zones and potential for contamination) and geology.
- b. Have been designed to follow the drainage hierarchy in the London Plan

### 2) Quantity

Table 9.3

Extent	Size of development site	Measures required	To be assessed through
Borough wide	All developments equal to or greater than 1 ha	The maximum rate of surface water discharge from the site must match the greenfield runoff rate (peak run off rates and volumes of run off) with on-site attenuation provided for the 1 in 100 year event  <u>OR</u> Must meet the requirements of statutory national SuDS guidance where this supersedes the above (i.e. sets an enhanced requirement).	Submission of a site specific FRA
Borough wide	All developments of more than one property or covering an area equal to or greater than 0.1ha	To reduce runoff from the site by at least 50% through the use of SuDS, with on-site attenuation provided for the 1 in 100 year event  <u>OR</u> Must meet the requirements of statutory national SuDS guidance where this supersedes the above (i.e. sets an enhanced requirement).	Submission of a Sustainable Design and Construction Statement  (see appendix on Sustainable Design and Construction Statements)
Borough wide	Other minor development	To include at least one 'at source' SuDS measure, resulting in a net improvement in water quantity or quality discharging to sewer in-line with any SuDS guidance or requirements.	Submission of a Sustainable Design and Construction Statement  (see appendix on Sustainable Design and Construction Statements)

## 9 Tackling Climate Change

<b>Critical Drainage Area (CDA)</b>	All developments of more than one property or covering an area equal to or greater than 0.1ha	To reduce run off to pre-development Greenfield run off rates with on-site attenuation provided for the 1 in 100 year event  <u>OR</u>  Must meet the requirements of statutory national SuDS guidance where this supersedes the above (i.e. sets an enhanced requirement).	Submission of a Sustainable Design and Construction Statement  (see appendix on Sustainable Design and Construction Statements)  Submission of a site specific FRA (where the property is a risk of surface water flooding)
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### 3) Quality

- a. Where appropriate, major developments must follow the SuDS management train and, having regard to best practice, provide a number of treatment phases corresponding to their pollution potential and the environmental sensitivities of the locality
- b. Ensuring the measures maximise opportunities for sustainable development, improving water quality (SuDS management train), biodiversity, local amenity and recreation value.

### 4) Functionality

- a. Ensuring that the system is designed to allow for flows above the design capacity to be conveyed off-site with minimum impact
- b. Provide clear ownership, management and maintenance arrangements.

*This policy should be read in conjunction with Core Strategy policy 28.*

### Justification and guidance on implementation

- 9.4.17** Effective management of surface water will reduce the risk of flooding, pollution and other environmental damage and is a material planning consideration in determining proposals for the development and use of land.
- 9.4.18** As everywhere in Enfield is either in an area at risk of flooding or upstream of an area at risk of flooding, any development has the potential to increase the risk of flooding further down the catchment. Even apparently minor developments, such as modifications to individual properties, contribute significantly to the overall runoff characteristics of a given catchment area when their cumulative effect is considered. Consequently, the Core Strategy and this draft policy require all developments to incorporate SuDS. All developments must also make every effort to retain permeable surfaces, flood storage and flow routes to mitigate possible increases in flood risks elsewhere. SuDS should be provided on site so that they are managed as part of that development unless there are practical reasons for not doing so.
- 9.4.19** The selection of SuDS measures must be appropriate to the site and the nature of the proposed development and/or operations. Local geology, areas of sensitive groundwater supplies (such as source protection zones), and the pollution potential of certain uses may constrain the types of SuDS that can be employed on particular sites. However, this does not mean that SuDS should not be implemented. Developers must use information on local conditions, including the SFRA, SWMP and the information held by other organisations, to inform/justify their selection of SuDs measures.

## 9 Tackling Climate Change

- 9.4.20** The SuDS hierarchy prioritises the prevention and management of surface water run-off as close to its source as possible and, therefore, SuDS should be provided on site unless it can be demonstrated that this is not feasible. In such cases, the developer should manage as much run-off as possible on-site and provide off-site provision to manage the remaining run-off as close as possible to the site.
- 9.4.21** All new development on sites greater than 1 hectare in size must be accompanied by a site specific flood risk assessment to assess potential flood risk implications to and from development, including an assessment of surface water. The SFRA makes a number of recommendations with regards to surface water to minimise the rate of run-off and reduce the risk of flooding, which have been incorporated as part of this draft policy. The emerging SWMP includes measures to reduce the hazard in these areas, such as the need for specific run-off rates for developments in critical drainage areas and across the borough.
- 9.4.22** Expecting SuDS schemes to deliver additional benefits in terms of improving water quality and enhancing biodiversity/amenity can contribute towards meeting a number of wider sustainability policy objectives. Water quality can be improved if the SuDs include treatment phases, and in line with best practice, the number of treatment stages should correspond with the run-off pollution potential. SuDS measures can also provide opportunities to enhance local biodiversity and amenity, such as the use of green roofs, basins and ponds.
- 9.4.23** To be effective, SuDS need to be properly maintained. Maintenance issues can be simplified by keeping SuDS above ground. SuDS features should be visible and their function clearly understood by those responsible for their maintenance. By keeping such features above ground, when problems do occur they are generally obvious and can be remedied simply using standard landscaping practice. Examples of above ground SuDS features include basins and ponds, green roofs, permeable surfaces, water butts and swales.
- 9.4.24** The forthcoming Enfield Design Guide will provide guidance on ensuring SuDS are implemented appropriately as part of development. Developers are encouraged to discuss their proposals with the Council before submitting them as part of planning applications.

### DRAFT DMD 61

#### Flood Control and Mitigation Measures

Where developments located in flood risk areas or have flood risk implications are potentially acceptable, they will be required to demonstrate that appropriate mitigation measures are included to ensure that flood risk is not increased and is reduced where possible. This should include management of any residual flood risk and measures to make the development and its users safe, including:

- a. Maintaining or providing new/upgraded flood infrastructure at a sufficient standard of protection and/or financial contributions towards measures which reduce and mitigate against flood risk. Where new infrastructure or protection results in losses in floodplain storage volume, all losses must be compensated for in an appropriate manner;
- b. Maintaining adequate distances from rivers/watercourses in line with DRAFT DMD 62 'Protection of watercourses and flood defences';
- c. Flood resilient and flood resistant design measures, including appropriate finished floor levels, safe access and escape routes;
- d. Applying appropriate construction techniques to limit the disturbance to natural groundwater flows, such as the use of piled foundations; and
- e. Flood Warning arrangements and Evacuation Plans.

Where the development is for essential infrastructure, the measures should ensure that the site is designed to remain operational when floods occur.

## 9 Tackling Climate Change

The flood mitigation measures should be in accordance with area-specific measures identified in SFRA level 2 and the Local Flood Risk Management Strategy. Taking advice from the Environment Agency, the Council will refuse proposals which provide an unacceptable standard of safety.

*This policy should be read in conjunction with Core Strategy policy 28.*

### Justification and guidance on implementation

- 9.4.25** Development should first directed away from flood risk; therefore, developers must apply DRAFT DMD 58 'Avoiding and Reducing Flood Risk' and DRAFT DMD 59: Assessing Flood Risk in the first instance, and not just refer to this policy to justify the development in these areas. Where developments located in flood risk areas or the flood risk implications are potentially acceptable, developers must demonstrate in FRAs how the proposals would control/manage the risks of development having regard to relevant evidence such as the SFRA and SWMP. In consultation with the Environment Agency, the Council will consider mitigation measures to ensure that the development is safe.
- 9.4.26** The SFRA include a number of potential mitigation measures which are incorporated into the draft policy above. To be classed as 'safe', the development must:
- Provide a dry access route above the 100 year plus climate change flood level or, where appropriate modelled data exists, an access route within the low hazard area of the floodplain (as defined by the Environment Agency's Flood Risk Assessment Guidance for New Development R&D Technical Report FD2320) to and from any residential development should be provided.
  - Finished floor levels for these developments should be set at least 300mm above the 100 year plus climate change flood level. To achieve this without increasing flood risk elsewhere, it must be shown that there will be no net loss of flood storage and that overland flow routes will not be obstructed. For surface water flooding, a 100mm freeboard instead of 300mm may be considered.
- 9.4.27** The Council is preparing a SFRA level 2 to apply the exception test and as supporting evidence for development sites identified through the AAP and masterplan process for Central Leaside and North East Enfield. This will consider whether the outline development proposals passes the 3 tests outlined in DRAFT DMD 59: Assessing Flood Risk, which could potentially include area specific measures required to make the development safe. Development needs to have regard to any requirements set out in this document.

### DRAFT DMD 62

#### Protection of watercourses and flood defences

The Council will ensure that all developments make space for water and protect the integrity of flood defences by:

- a. Requiring adjacent development to protect the integrity of existing flood defences;
- b. Ensuring that permanent built developments are set back from and maintain a 8m buffer strip alongside main rivers;
- c. Expecting development to maintain an adequate distance between new development and ordinary watercourses. The distance applied will be determined having regard to the nature of the development and the type of ordinary watercourse
- d. Adopting a presumption in favour of the removal of existing culverts and against further culverting (main rivers and ordinary watercourses);
- e. Not permitting development on any safeguarded land required for current and future flood management;

The Environment Agency will be consulted on applications within 20m of a main river. Development proposals in the vicinity of waterways need to ensure that they are compatible with the main messages and objectives of the Lower Lee Flood Risk Management Strategy and Thames Catchment Management Plan.

## 9 Tackling Climate Change

*This policy should be read in conjunction with Core Strategy policies 28 and 29.*

### Justification and guidance on implementation

- 9.4.28** The protection of existing flood defences is important because of their significant function; the failure of these assets could have severe consequences and pose a risk to life and property. New development should therefore be set back from defences to ensure that there is space and access available to allow for future maintenance; and should also be set back from waterways to preserve their settings and to minimise the risks to the development.
- 9.4.29** The naturalisation of these watercourses releases the potential for additional conveyance and flood storage, amenity and biodiversity value, therefore development should take opportunities for de-culverting existing watercourses and there will be a general presumption against further culverting.
- 9.4.30** Where flood management projects which require land are identified, development will need to have regard for them in their proposals. Future Area Action Plans may outline the land necessary to set aside to support new development proposed in flood risk areas.
- 9.4.31** Catchment Flood Management Plans (CFMPs) have been produced by the Environment Agency to give an overview of the flood risk across each river catchment. They recommend ways of managing those risks now and over the next 50-100 years. CFMPs consider all types of inland flooding, from rivers, ground water, surface water and tidal flooding, but not flooding directly from the sea (coastal flooding) which is covered in Shoreline Management Plans. They also take into account the likely impacts of climate change, the effects of how we use and manage the land, and how areas could be developed to meet our present day needs without compromising the ability of future generations to meet their own needs.
- 9.4.32** The main messages of the Thames Catchment Management Plan are to:
- Store water or manage run-off in locations that provide overall flood risk reduction and environmental benefits and encourage compatible land uses;
  - Maintain and, where possible, improve the flow of water in the rivers as they pass through built up areas;
  - Identify opportunities to make existing drainage systems more effective;
  - Maintain and, where possible, improve the capacity of the floodplain to store water, making use of the open spaces available within the floodplain, and preventing the loss of open spaces;
  - Increase the resistance and resilience of buildings through redevelopment; and
  - Work with partners to identify critical infrastructure at risk.
- 9.4.33** The Environment Agency have produced the Lower Lee Flood Risk Management Strategy to investigate options for managing flood risk in the Lower Lee catchment for the next 100 years. The strategy covers the River Lee from its confluence with the River Rib just south of Hertford, downstream to Hackney in north London, and its tributaries including the Small River Lee, Turkey Brook, Salmons Brook and Pymmes Brook in Enfield. The main messages of the Lower Lee Flood Risk Management Strategy are to:
- Continue to maintain and renew the existing defences;
  - Support the construction of flood storage on Cobbins and Salmons Brooks (these are already in progress); and
  - Investigate the potential for local flood defences/storage on Pymmes Brook to help protect against future climate change impacts.

# Environmental Protection

## 10 Environmental Protection

# 10 Environmental Protection

### DRAFT DMD 63

#### Pollution Control and Assessment

The Council will only support developments which prevent, where possible, or minimise and mitigate pollution or potential risks during all phases of development, including demolition/decommissioning, construction, operations/occupation and maintenance. Assessment will be required in order to establish and assess the level of impact in line with other DMD policies and relevant legislation, and planning conditions/obligations may be imposed on developments to minimise and monitor any impacts. On the basis of the precautionary principle, planning permission will be refused where insufficient information is provided, and the risks associated with or the level of remediation is unacceptable.

*This policy should be read in conjunction with Core Strategy Policies 22 and 32*

#### Justification and guidance on implementation

- 10.0.1** Protecting and improving environmental quality is a key facet of achieving truly sustainable development. The functional importance of environmental resources (such as air, water and land) in sustaining every day life is clear, so developments need to reduce its impacts on and, where possible, take opportunities to improve environmental quality within the Borough.
- 10.0.2** Forms of pollution (such as noise, vibrations, light, odour, dust, as well as land, water and air based pollution) can reduce the environmental quality of the borough, amenity, and negatively affect human health, safety and well being. Alongside other policies in this document on environmental sustainability, transport and green infrastructure, the policies set out below aim to ensure that forms of pollution are considered, controlled and mitigated against as part of all developments.
- 10.0.3** The precautionary principle<sup>(15)</sup> states that if a particular course of action has the potential to cause serious or irreversible damage to the public or the environment, a lack of scientific certainty that the action is actually harmful, is not a reason for not implementing mitigation measures or a full consideration of these potential risks. Developers will be expected to demonstrate that the proposal is not harmful and that there is a full assessment of any potential risks and any necessary mitigation measures have been included.
- 10.0.4** Developers are encouraged to discuss their proposals with the Council and relevant authorities (Environment Agency, Health and Safety Executive) before submitting an application.
- 10.0.5** Assessments required depend on the type and location of development proposed, there may be a need for:
1. An Environment Statement relating to a schedule of Environment Impact Assessment development
  2. Site investigations for contamination
  3. Air Quality Assessments
  4. Noise Assessments
  5. Risk Assessments – ground water, hazardous installations

## 10 Environmental Protection

### 10.1 Air Quality

#### DRAFT DMD 64

##### Air Quality

The Council will seek to minimise the impacts on air quality from development and reduce harmful exposure to air pollution by:

- a. Expecting all developments to be, as far as possible, 'air quality neutral' by applying best available techniques; and incorporate measures which reduce transport and building design related air quality impacts. Any measures must be in line with DMD policies on transport and sustainable design and construction and help to meet the objectives in the Air Quality Action Plan.
- b. Separating potentially polluting land uses from sensitive land (such as schools, hospitals, residential units) or areas (ecologically important sites, green belt).
- c. Expecting developments of sensitive uses to be sited away from major sources of pollution, unless this is not possible and it can be demonstrated that adequate mitigation measures are in place to ensure the air quality is suitable for the proposed use of the site.
- d. Where appropriate, requiring planning applications for major developments in air quality hotspots (see appendix) or in other cases of development where they may have implications for air quality (biomass boilers), to be accompanied by an air quality assessment and to incorporate appropriate mitigation measures, employing the best available techniques where necessary.
- e. Refusing planning permission for developments which would have an adverse impact on local air quality unless the developer is able to demonstrate that measures can be implemented that will mitigate these effects.

*This Policy should be read in conjunction with Core Strategy Policy 32.*

#### Justification and guidance on implementation

**10.1.1** Assessments undertaken as part of Enfield's Air Quality Action Plan concluded that it was unlikely that air quality standards for nitrogen dioxide and particles would be met by specified dates. Areas were identified where people are likely to be exposed to poor air quality, so the whole of the borough was declared an Air Quality Management Area (AQMA) in 2001. Road traffic was found to be a dominant source, alongside a more minor contribution from industry, and calculations showed at the roadside of major roads standards are not met for nitrogen dioxide and particles (see Appendix). The extent of the area of pollution is closely related to the amount of traffic, the vehicle composition, average speed, and other characteristics of congestion. The key actions from Enfield's Air Quality Action Plan relevant to planning are addressed in this document such as the need for green travel plans, supporting the introduction of clean fuel technology, considering restrictive parking where appropriate and road improvements which help to manage congestion.

**10.1.2** The general approach is for development to avoid/prevent, reduce, and mitigate against the impacts of poor air quality; and should adopt the best available techniques. New development should not lead to a significant deterioration in air quality, and in line with the London Plan (2011), should aim to be air quality neutral. Developments for sensitive uses such as schools, hospitals, residential units should be located away from major sources/areas of air pollution. However, where this is not possible, developments must be designed and sited to reduce exposure to air pollutants by incorporating mitigation measures including:

- Setting back development and creating screening/buffer zone between the development façade and pollution source;
- Ventilation provision (including the maintenance arrangements);
- the location of amenity space/balconies, opening windows and doors;

## 10 Environmental Protection

- the internal layout, particularly the placement of habitable rooms away from the façade fronting the pollution source;
- non residential usage of lower floors;
- Ensuring the design of the development does not create a canyon effect (the design should create gaps in the building façade to help to free flow of air)
- Transport related measures (such as travel plans, car clubs, public transport, car free/minimal car parking/preferential parking for low emission vehicles)

**10.1.3** The Core Strategy includes strategic land allocations in the form of Area Action Plan (AAP) and Regeneration Priority Areas (RPA). These propose a ranges of land uses including housing, employment, community/social facilities, open space, leisure and recreation. Major roads and industrial uses, and therefore air quality hotspots are included within the boundaries of the AAPs and RPAs allocations, such as the A406. The justifications for locating developments in these areas and opportunities to improve air quality (such as rail and road schemes) have been included in the Core Strategy, and any area specific considerations will be taken forward in the AAPs and/or masterplans.

**10.1.4** Air quality assessments will be required, either as part of an Environmental Impact Assessment (EIA) or as a standalone document, for developments in air quality hotspots identified in the Air Quality Action Plan or in other cases of development which have implications for air quality, for example proposals which include biomass boilers. These air quality assessments are required to ensure that developments would not lead to the further deterioration in air quality or lead to increased exposure to receptors without adequate mitigation measures. Air quality assessments should include details of any proposed mitigation measures and demonstrate their effectiveness. It is recommended that developers investigate local air quality conditions at an early stage in order to establish whether the development is located in an area of poor air quality hotspot to ensure that any mitigation measures can be incorporated at the design stage. The whole of the borough is a Air Quality Management Area so all developments will be expected to incorporate certain transport related mitigation measures.

**10.1.5** The preparation of air quality assessments should consider:

- The existing, and likely future, air quality in the local area, including its location in relation to any identified air quality hotspots and any other areas where air quality is likely to be poor;
- The impact of development proposals in rural areas with low existing levels of background air pollution;
- The need for compliance with the air quality objectives prescribed by the Air Quality Regulations;
- The possible impact of potentially polluting development (both direct and indirect) on land use, including effects on health, the natural environment or general amenity;
- The potential sensitivity of the surrounding area (environmental designations such as SSSI) and nearby uses (such as schools, hospitals and residential units) to the adverse effects of air pollution; and
- The need for mitigation measures and also their appropriateness and effectiveness with regard to the particular circumstances of the site.

**10.1.6** Where developments are located in poor air quality areas, planning contributions may also be sought towards air quality measures.

**10.1.7** Support for the use of more sustainable sources of energy, such as biomass and CHP, is provided in national, regional and local policy. However, the use of biomass or CHP needs to be weighed up against any potential impacts this may have on local air quality. Where mechanical ventilation is used as a mitigation measure, the Council will expect developments to achieve high standards of energy efficiency to ensure the addition of these measures do not undermine the delivery of sustainable development.

# 10 Environmental Protection

## 10.2 Land Contamination

### DRAFT DMD 65

#### Land Contamination

Planning applications for all development proposals on land which is or may be affected by contamination must include an initial assessment undertaken by the developer assessing:

- a. the previous uses of the site;
- b. the potential for contamination; and
- c. any risks; and appraise remediation options in relation to the proposed development

Where contamination is known or suspected and the initial assessment does not demonstrate that the risks are acceptable, the Council will require the developer to provide more detailed investigations/studies to determine the level or existence of contamination, assess the risks, and whether these can be successfully addressed through a remediation and management strategy without undue environmental impacts during and following the development. On site remediation (treatment in-situ or ex-situ) of contaminated soils will be encouraged, where appropriate, to reduce waste sent to landfill in line with NLWP policy.

The Council may impose planning obligations/conditions to ensure that remediation of the site is secured, the level of remediation is suitable for its intended end use, and the development is safe. Planning permission will be refused if there are unacceptable risks which are not addressed through remediation.

*This Policy should be read in conjunction with Core Strategy Policies 22 and 32.*

#### Justification and guidance on implementation

- 10.2.1** Within the borough, there is a chequered history of land uses including significant concentrations of industrial uses and critical infrastructure particularly in the Lee Valley. As well as contamination due to human activities, there may also be natural sources of contamination. Whilst modern pollution control measures are in place to prevent new contamination and reduce the impact of existing activities, there is the potential for contaminated land from previous land uses.
- 10.2.2** Under Part IIA of the Environmental Protection Act 1990, local authorities have a duty to inspect land in its area for contamination, and when it is identified to ensure that it is managed appropriately. Local authorities are required to publish a written strategy outlining how they would meet these statutory requirements. A Contaminated Land Strategy was written in 2001 and has since been implemented. The Council keeps a Contaminated Land Register, however, to date no sites have been determined as meeting the statutory definition of Contaminated Land and no remediation notices have been served. Developers must have regard to available records, such as the Contaminated Land Register when assessing the potential for land contamination.
- 10.2.3** The Council seeks to prioritise the reuse of brownfield land to take advantage of the opportunities for environmental benefits arising from development such as the remediation of land. The Council encourages the voluntary remediation of contaminated land, irrespective of whether it is subject to development; and, where necessary, the Council will use statutory powers to require remediation.
- 10.2.4** The Core Strategy directs development to key strategic areas which may be affected by contamination, particularly in the Lee Valley. There may also be sites affected by contamination not known to the borough or developments which, through a change of use or intensity, change the dynamics of the pollution linkage. Therefore, the potential for contamination needs to be investigated and considered as part of the planning application process. The Area Action Plans and associated masterplans will consider issues of contamination where this is appropriate.

## 10 Environmental Protection

- 10.2.5** Where the potential for contamination is identified through the planning system, developers will be required to carry out detailed site investigations, provide a risk assessment, remediation and management strategy:
- Whether the land in question is already affected by contamination through source-pathway-receptor pollutant linkages and how these linkages are represented in a conceptual model;
  - Whether the development proposed will create new linkages e.g. new pathways by which existing contaminants might reach existing or posed receptors and whether it will introduce new vulnerable receptors; and
  - What action is needed to break those linkages and avoid new ones, deal with any unacceptable risks and enable safe development and future occupancy of the site and neighbouring land.
- 10.2.6** The report should also outline the impacts of the remediation activities (including dust, noise and traffic movements) and demonstrate that the development can be carried out safely without unacceptable risks to workers, neighbours or other off site receptors. An initial assessment will be required as part of a planning application, or otherwise will be required via a condition of the planning permission to submit further details to the Council to demonstrate that contamination has been considered, and will be subjected to appropriate remediation. A verification report will be required to demonstrate that the remediation works have been implemented successfully and to confirm the absence of any unacceptable risks from contamination. The remediation strategy should consider waste management implications when deciding the best approach to remediation and the handling and treatment of contaminated soils, including treatment in-situ and ex-situ<sup>(16)</sup> and other material.
- 10.2.7** The standard of remediation should ensure that the site is suitable for its proposed use, and that all unacceptable risks (to receptors such as living organisms, ecological systems – fauna/flora, property, landscape, amenity) have been addressed. As a minimum, the remediation must at least ensure that the land, after development, is not capable of being determined as contaminated land under Part IIA of the Environmental Protection Act 1990.

### 10.3 Hazardous Substances

#### DRAFT DMD 66

##### Hazardous Installations

In consultation with the Health and Safety Executive and the Environment Agency and considering any standing advice, the developer must consider the risks arising from new hazardous installations or developments in the vicinity of existing installations (see appendix on Hazardous Installations), having regard to the location/proximity and type/sensitivity of development. The developer may be required to undertake and submit a risk assessment and incorporate necessary safeguards to ensure the development is safe.

*This Policy should be read in conjunction with Core Strategy Policy 32.*

#### Justification and guidance on implementation

- 10.3.1** The Planning (Hazardous Substances) Act 1990 aims to prevent major accidents and limit the consequences of such accidents. The Town and Country Planning (Local Development) (England) Regulations 2004 makes clear the need for LDDs to have regard to:
1. the objectives of preventing major accidents and limiting the consequences of such accidents; and the need, to maintain appropriate distances between establishments and residential areas, buildings

16 When materials are taken away and treated off site but are brought back to use on the site.

## 10 Environmental Protection

and areas of public use, major transport routes as far as possible, recreational areas and areas of particular natural sensitivity or interest, and

2. in the case of existing establishments, for additional technical measures in accordance with Article 5 of Council Directive 96/82/EC on the control of major accident hazards

**10.3.2** The planning process must ensure that the risks arising from new hazardous installations and development within the vicinity of existing installations are considered. There are a number of major hazard sites and pipelines in Enfield (see appendix), including gasholders, gas supply pipelines and sewage treatment works.

**10.3.3** The Council will seek the advice of the Health and Safety Executive (HSE) and the Environment Agency (EA), and other organisations as appropriate when considering the potential risks from new hazardous installations and proposed development near such installations. The HSE have defined consultation zones around hazardous installations and issued standing advice to provide an indication of when they consider development to be appropriate/not appropriate. If a new installation is proposed, the Council will seek to ensure that it is located appropriately to minimise risks to the surrounding population and to environmental quality. A risk assessment may be required to ensure that appropriate safeguards are incorporated as part of the development. It may be necessary to ensure that new sensitive developments (such as new housing, schools, hospitals, areas of public use, areas of particular natural sensitivity or interest) are located a safe distance away from installations.

### 10.4 Noise

#### DRAFT DMD 67

##### Noise

1) Developments must be sensitively designed, managed and operated to reduce exposure to and the potential for noise generation having regard to the following techniques:

- a. Building design (positioning of façades, selection of materials);
- b. Layout of uses and rooms;
- c. Positioning of building services;
- d. The use of landscaping;
- e. Sound insulation;
- f. Contractors agreements; and
- g. Restricting the hours of operation/deliveries.

2) Noise sensitive developments/land uses must be located away from existing sources of significant noise. Where this is not possible, planning applications must be accompanied by a noise assessment, having regard to the noise exposure categories below. The Council will need to be satisfied that any proposed mitigation measures will be able to reduce noise to an acceptable level, and in the case of new dwellings, will expect them to achieve the preferred standards for noise in the Mayor's Sustainable Design and Construction SPG

3) Potential noise generating development must avoid noise sensitive developments/land uses, and locate in appropriate locations, having regard to the character of the locality, compatibility of similar uses, amenity, and the relative ambient noise levels; where any impacts can be minimised to an acceptable level. Noise generating developments must not contribute to cumulatively higher noise levels and, where appropriate, must be designed to achieve an improvement on background levels with an overall aim to achieve an improvement of 10dB.

4) Planning permission for plant/machinery will only be acceptable if it can be operated without causing harm to amenity.

5) Planning permission will be refused if developments would generate or be exposed to an unacceptable level of noise.

## 10 Environmental Protection

6) Developers are encouraged to enhance local soundscapes, by maximising the use of soft ground and dense vegetation.

*This Policy should be read in conjunction with Core Strategy Policy 32.*

### Justification and guidance on implementation

- 10.4.1** Noise is an inherent part of everyday life and the character of different places (i.e. its absence marking places of tranquillity or by its presence in vibrant areas of mixed activities or land uses). The impacts of noise depends on the context, but high levels can have a considerable affect on human health, productivity and quality of life. Given the existing mix of land uses and activities and the need to make the most sustainable use of land, there is the potential for conflict between noise sensitive and noise generating developments. The impacts of noise are a material planning consideration, and this should be managed through the development process.
- 10.4.2** The effect of noise can be minimised by separating conflicting developments. Noise sensitive developments/land uses should not be located close to major sources of noise ( such as road, rail, and certain industrial development) unless the effects can be mitigated. Also, new noise generating development must be located away from noise sensitive development/uses (such as schools, hospitals, residential units, open space, wildlife sites – SSSI) unless mitigation measures are used effectively reduce noise levels.
- 10.4.3** A concentration of new noise generating plant equipment, through a process of ‘background creep’, can cumulatively result in increasing the background noise levels. Developments of this type must therefore achieve a reduction in noise generation so that, over time, there is not a further increase in overall noise levels. 10 dB(A) below the lowest measured background level at the façade of the nearest residential property represents the point where any new noise sources will not increase the existing background level at all. However, if the developer could demonstrate that can not meet 10dB the Council will consider what level of improvement could be achieved. The lowest background level will be required because it is assumed that the equipment would be operating all the time, unless specifically stated that it will stop at a certain time, in which case we would expect 10 dB(A) below the lowest background level during times of operation.
- 10.4.4** In line with the London Plan Sustainable Design and Construction SPG, developments should minimise the adverse impacts of noise using measures at source or between the source and receptor in preference to sound insulation at receptor, wherever practicable. Good design measures and an effective layout to minimise the adverse impact of noise should be part of any overall package of noise reduction, and should be considered in advance of, and in addition to, sound insulation. This will ensure that sound insulation is not used in isolation, and that more consideration is given to the way the development can reduce noise, as well as how landscaping could enhance soundscapes.
- 10.4.5** Where a proposed development has the potential to negatively impact on a noise sensitive development, the Council will require a noise assessment to investigate noise levels and determine the effective of mitigations measures.
- 10.4.6** Recommended Noise Exposure Categories (NEC) for new dwellings near existing noise sources:

Table 10.1

Noise Levels <sup>o</sup> Corresponding To The Noise Exposure				
Categories For New Dwellings $L_{Aeq,T}$ dB				
Noise Exposure Category				
Noise Source	A	B	C	D

## 10 Environmental Protection

road traffic				
07.00 - 23.00	<55	55 - 63	63 - 72	>72
23.00 - 07.00 <sup>1</sup>	<45	45 - 57	57 - 66	>66
rail traffic				
07.00 - 23.00	<55	55 - 66	66 - 74	>74
23.00 - 07.00 <sup>1</sup>	<45	45 - 59	59 - 66	>66
air traffic <sup>2</sup>				
07.00 - 23.00	<57	57 - 66	66 - 72	>72
23.00 - 07.00 <sup>1</sup>	<48	48 - 57	57 - 66	>66
mixed sources <sup>3</sup>				
07.00 - 23.00	<55	55 - 63	63 - 72	>72
23.00 - 07.00 <sup>1</sup>	<45	45 - 57	57 - 66	>66

### Notes

<sup>0</sup>**Noise levels:** the noise level(s) ( $L_{Aeq,T}$ ) used when deciding the NEC of a site should be representative of typical conditions.

<sup>1</sup>**Night-time noise levels (23.00 - 07.00):** sites where individual noise events regularly exceed 82 dB  $L_{Amax}$  (S time weighting) several times in any hour should be treated as being in NEC C, regardless of the  $L_{Aeq,8h}$  (except where the  $L_{Aeq,8h}$  already puts the site in NEC D).

<sup>2</sup>**Aircraft noise:** daytime values accord with the contour values adopted by the Department for Transport which relate to levels measured 1.2m above open ground. For the same amount of noise energy, contour values can be up to 2 dB(A) higher than those of other sources because of ground reflection effects.

<sup>3</sup>**Mixed sources:** this refers to any combination of road, rail, air and industrial noise sources. The 'mixed source' values are based on the lowest numerical values of the single source limits in the table. The 'mixed source' NECs should only be used where no individual noise source is dominant.

To check if any individual noise source is dominant (for the purposes of this assessment) the noise level from the individual sources should be determined and then combined by decibel addition (remembering first to subtract 2 dB (A) from any aircraft noise contour values). If the level of any one source then lies within 2 dB(A) of the calculated combined value, that source should be taken as the dominant one and the site assessed against the appropriate NEC for that source, rather than using the 'mixed source' NECs. If the dominant source is industrial noise see paragraph 19 of Annex 3.

If the contribution of the individual noise sources to the overall noise level cannot be determined by measurement and/or calculation, then the overall measured level should be used and the site assessed against the NECs for 'mixed sources'.

### 10.5 Light Pollution

DRAFT DMD 68

Light Pollution

## 10 Environmental Protection

Development proposals which include external lighting installations will be assessed to ensure they limit and, where possible, reduce the adverse impact of light pollution and would not have a harmful impact on local amenity, nature conservation/wildlife, and on the environment. Where necessary, the Council will require developers to take measures to control the level of illumination, glare, spillage of light, angle, lighting type/control (i.e. the ability to dim the lighting levels), and hours of usage in-line with best practice (ILE Guidance Notes for Reduction of Light Pollution). The schemes should be energy efficient and solar powered wherever possible.

*This Policy should be read in conjunction with Core Strategy Policy 32.*

### Justification and guidance on implementation

- 10.5.1** Artificial lighting schemes can affect amenity through glare and light spillage; the more obvious visual impact of developments, particularly at night; increased disturbance from extended activity; and the potential for adverse impacts on wildlife interests. On the other hand, there are a number of relative benefits to counter balance this, such as the opportunity for evening activities and increasing the perception and experience of safety and security.
- 10.5.2** Developers will need to submit a Light Assessment Report detailing the affect that the proposed development will have on neighbouring residential properties. This should include mitigation measures to secure safer access routes and crime reduction. A Light Assessment Report will be required to assess light pollution, detailing lighting levels and spread.

## 10.6 Water Quality

### DRAFT DMD 69

#### Water Quality

The Council will seek to improve water quality through the use of SuDS techniques which address water quality, in line with DRAFT DMD 60 'Sustainable Drainage Systems'. In consultation with the Environment Agency, the developer must consider the risks arising from developments (including design, construction and operation) to water quality, including waterways, identified Source Protection Zones (SPZ) or Aquifers. Developments in SPZs or Aquifers may require risk assessments (for certain higher risk activities e.g. cemeteries, waste uses, industrial), mitigation and management strategies to determine whether the proposed use would pose a threat to water quality, and includes suitable strategies for dealing with this risk.

*This Policy should be read in conjunction with Core Strategy Policies 21 and 32.*

### Justification and guidance on implementation

- 10.6.1** Improving water quality meets a number of key objectives: it increases the potential for the recreational use of Enfield's water resources; it provides a better quality environment for and opportunities to enhance biodiversity; it also helps to maintain a good quality supply of drinking water. Measures to improve water quality such as SuDS also provide other cross benefits, such as the reducing/managing flood risk, this is discussed in more detail in the section on Flood Risk.
- 10.6.2** Enfield has more waterways than any other London Borough and large reservoirs. However, the unseen sources of groundwater are also equally important but often overlooked. Groundwater is a significant contributor towards our drinking water supply; supporting wetland ecosystems and surface water flows as part of the wider water cycle.
- 10.6.3** The European Water Framework Directive provides clear objectives for protecting and enhancing water quality, both surface and ground water. The Environment Agency (EA) have published a Thames River Basin Management Plan which identifies areas of poor water quality in Enfield, and a programme of

## 10 Environmental Protection

measures to improve the condition of the waterways. There are a number of source protection zones<sup>(17)</sup> and aquifers<sup>(18)</sup> in the borough, these areas of groundwater storage or sensitive areas of extraction where the risk to groundwater quality may need to be considered. The EA is the statutory body responsible for the protection and management of groundwater resources, and have produced a Groundwater Protection: Policy and Practice (GP3). GP3 sets out the EA policies and approach towards groundwater protection.

### Source Protection Zones

Maps showing the locations of Source Protection Zones in Enfield can be found at:  
<http://www.environment-agency.gov.uk>.

17 Source Protection Zones (SPZs) are groundwater sources such as wells, boreholes and springs used for public drinking water supply. These zones show the risk of contamination from any activities that might cause pollution in the area. The closer the activity, the greater the risk. The maps show three main zones (inner, outer and total catchment) and a fourth zone of special interest, which is occasionally applied, to a groundwater source.

18 Aquifer - underground layers of water-bearing permeable rock or drift deposits from which groundwater can be extracted.

## 10 Environmental Protection

# Green Infrastructure

## 11 Green Infrastructure

### 11 Green Infrastructure

- 11.0.1** This chapter deals with Green Infrastructure. Green Infrastructure relates to a network of multifunctional open spaces necessary to support social, economic and environmental benefits close to where people live and work. Open spaces include green spaces such as parks, allotments, commons, recreation grounds and playing fields; children's play areas, woodlands, waterways and natural habitats and civic spaces such as squares. For private amenity space refer to **DRAFT DMD 13 'Amenity Space'**

#### DRAFT DMD 70

##### Green Infrastructure

*Developments on sites of 0.5ha or more must contribute to improving Green Infrastructure. Applicants must demonstrate consideration of each of the following components:*

- *Landscape character, setting and management*
- *Biodiversity and access to nature*
- *Water management*
- *Climate change adaptation*
- *Healthy and cohesive communities*
- *Green travel*
- *Green specifications*
- *Standards and facilities*
- *Green Infrastructure delivery*

This policy is in conjunction with Objective 9 and Core Policy 34 of the Core Strategy.

#### Justification and guidance on implementation

- 11.0.2** This policy will ensure that developers fully consider the component parts that make up the Borough's green infrastructure. Further guidance on how to apply this policy is contained in the accompanying Green Infrastructure Checklist. Applicants will need to have regard to the Green Infrastructure checklist in their accompanying submission. Details should be provided as part of the design and access statement.

### 11.1 Open Space

#### DRAFT DMD 71

##### Protection and enhancement of Open Space

Inappropriate development on land designated as Metropolitan Open Land will be refused except in very special circumstances.

The loss of other Open Space will be resisted unless additional open space can be re-provided in the same locality and of better quality to support the delivery of the Council's adopted Parks and Open Spaces Strategy or it has been demonstrated through the submission of an assessment that the open space in question is surplus to requirements.

Essential structures and facilities that would support the enjoyment of, and maintain the openness of the open space may be acceptable as long as the siting, location, design and materials would be sympathetic and proportionate to the operational requirements of the open space that it supports.

# 11 Green Infrastructure

This policy should be read in conjunction with Core Strategy Policy 34.

## Justification and guidance on implementation

- 11.1.1** In line with the NPPF Section 4: Promoting healthy communities, Core Policy 34, and the London Plan (Policy 7.18), there is a general presumption against development on open spaces, whether they are in public or private ownership. Existing open space sports and recreational buildings and land should not be built on unless an assessment has been undertaken which clearly demonstrates that the open space or buildings and land are surplus to requirements. For open space, 'surplus to requirements' should include consideration of all the functions that open space can perform.
- 11.1.2** Small low-scale ancillary uses necessary for the enjoyment of the open space are considered to be subservient to the main use and would therefore be considered as an acceptable addition in open spaces.
- 11.1.3** Metropolitan Open Land (MOL) is strategically important open space as prescribed by the London Plan. MOL is given the same protection and status as the Green Belt designation. Enfield is fortunate to have significant amounts of MOL in the borough that consist of large areas of public open space, amenity greenspace, allotments, private sports grounds, public and private playing pitches as well as some designated Green Chain areas. The London Plan sends out a clear message that there is a presumption against inappropriate development on MOL. Appropriate facilities for outdoor sport and recreation will only be acceptable where they do not have an adverse impact on the openness of MOL.

### Open Space Review - seeking your views

The Council has undertaken a review of its Open Space designations including the designation of Metropolitan Open Land (MOL). As a result, changes to the Policies Map are now proposed. Please see the Policies Map document, "Open Space Boundaries" report and "Metropolitan Open Space Boundaries" report for further information.

## DRAFT DMD 72

### Open Space Provision

All new major residential development must be accompanied by proposals to improve open space provision. The nature of such improvements should reflect the additional open space needs generated as a result of the proposed development.

If the proposed development is located within an identified area of deficiency for public park provision it will be necessary for additional land to be brought into public park use to mitigate any adverse impact on the provision of open space. Provision should be incorporated within the curtilage of the development in the first instance. In exceptional circumstances, a contribution towards off-site provision may be acceptable.

If the proposed development is not located within an area which is deficient in either quantity or access to public park provision, then consideration will be given to deficiency in any other type of open space provision, quality or value. It will be necessary for the applicant to make a contribution towards the enhancement of the quality of open space provision including the range of facilities and its condition.

The Council will assess the proposal's ability to meet the needs of the local catchment on the basis of how it adheres to the Green Infrastructure policy, taking into account the specific character, opportunities and constraints presented by each individual site.

New developments will be expected to incorporate open space that is capable of reaching at least 'Good to Very Good' quality in line with the Green Flag Award standards.

# 11 Green Infrastructure

This policy is in accordance with Core Strategy Policy 34.

## Justification and guidance on implementation

**11.1.4** The Council's open space and sports assessment identifies:

- Deficiencies in the quantity and quality of public parks in the Borough;
- The uneven distribution of children's play provision;
- The limited access to natural greenspace;
- The availability of allotments or community growing spaces; and
- The lack of good quality outdoor playing pitches.

**11.1.5** The map of Public Park Deficiency (see below) shows 8 areas deficient in access to public parks are: East Hadley Wood; Highlands; Southbury; Lower Edmonton; Grange; Winchmore Hill; Southgate; and Bowes. Some of the areas with the greatest open space deficiencies in the Borough are the locations where further population growth is planned. There is therefore a need to plan to meet existing and future open space needs by protecting and enhancing existing provision and seeking opportunities for new open space provision.

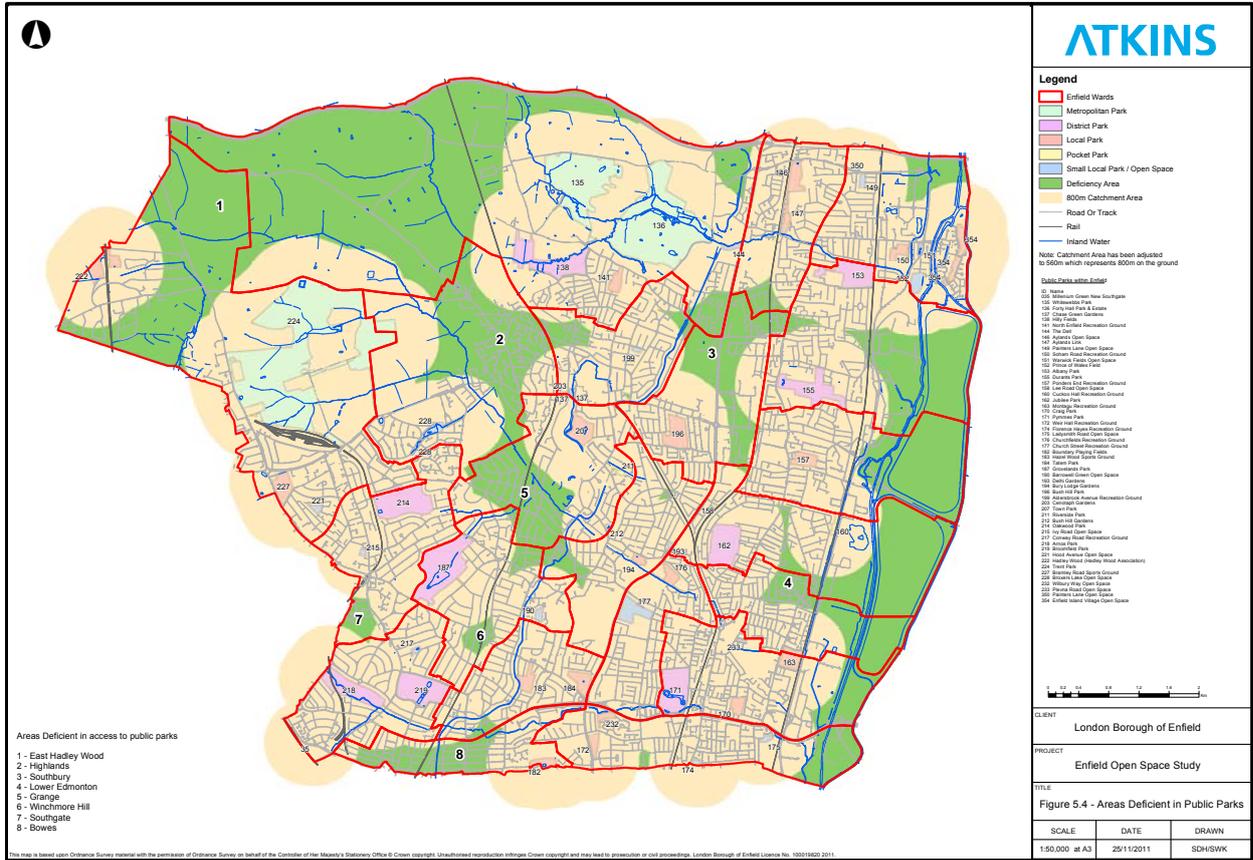
**11.1.6** In accordance with Core policy 34, the Council will protect the Borough wide standard of 2.37 hectares per 1000 population of public park provision and 7.01 hectares per 1000 population of open space. It is acknowledged that in some areas, such a target may not be able to meet the whole quota of providing additional open space in some parts of the borough. Therefore it is considered that in order to overcome this first issue through quantitative means, that a balance between qualitative, quantitative and accessibility approaches be adopted to improve the overall provision of open spaces, which could then provide greater multifunctional opportunities for new and existing residents. This preferred sustainable approach offers benefits to; water quality, biodiversity, air quality, landscapes and townscapes, human health, education, reduced crime, community welfare and improved access to services.

**11.1.7** There will be instances where there will be no requirement for publicly accessible open space provision to be provided. This consists of developments:

- that would be sited in an area of greater publicly accessible open space than the Borough's open space standard of 2.37Ha per 1000 population and would not create an area of open space deficiency through the development itself.
- that provide open space on-site in-line with the borough's open space standard or other standard under the definition of open space
- that can satisfactorily meet all other Green Infrastructure themes (see Policy Draft DMD 62).

# 11 Green Infrastructure

Map of Public Park Deficiency



- 11.1.8** As most residential and commercial developments have the potential to contribute to the increasing pressure on existing public open space and recreational facilities it is reasonable that these developments provide publicly accessible open space or contribute to that provision where it allows.
- 11.1.9** Where it has been demonstrated that this cannot be provided on site, developers will be required to make a contribution towards off-site provision. Further guidance is set out in the Council's S106 Supplementary Planning Document, adopted November 2011.
- 11.1.10** Applicants must recognise that most areas of open space can perform multiple functions. Therefore, proposals should take account of the various functions of open space when applying policies in this document.

## 11.2 Play space for children and young people

**DRAFT DMD 73**

**Children's Play Space**

All developments with an estimated child occupancy of ten children or more will be required to make appropriate play provision to meet the needs arising from the development on-site.<sup>(19)</sup> Where it is demonstrated to the Council's satisfaction that children's play space cannot be provided on-site, the applicant will be required to make a financial contribution towards off-site provision.

19 Source: Mayor of London's Supplementary Planning Guidance on Providing for children and young people's play and informal recreation, 2008

# 11 Green Infrastructure

Where a need for children's play space is identified, proposals should seek to provide play space to cater for the proposed development. Formal play spaces will be expected to:

- (a) Be well located – new facilities should be sited in locations that are overlooked, away from busy roads, noise and pollutants and where possible enable cohesion and integration with existing communities;
- (b) Make use of natural elements;
- (c) Provide a wide range of play experiences;
- (d) Be inclusive to all;
- (e) Allow children of different ages to play together;
- (f) Build opportunities to experience risk and challenge;
- (g) Are sustainable and easy to maintain; and
- (h) Allow for change and evolution.

Proposals involving the loss of children's play space and its associated facilities must comply with DRAFT DMD 71 'Protection and enhancement of Open Space'

This policy is in conjunction with Core Strategy Policy 34.

## Justification and guidance on implementation

- 11.2.1** Open space provides an important role in serving children's play needs. It is widely acknowledged that the importance of children's play extends far beyond the activity itself but contributes towards child development through the development of a wide range of physical, social and emotional skills and abilities. The key issues relating to children's play are the nature and location of play, the influence of age and gender, safety, risk issues and consideration of the types of play environments needed to meet play needs. The use of low value materials can help ensure play areas are not vulnerable to theft.
- 11.2.2** The outdoor environment is a key environment for children's play particularly during summer months. Play takes place in a range of environments many of which are not planned play environments it can include the street, back gardens and 'natural/wild' areas such as woods, areas of wasteland, disused buildings, back alleys and garage areas in addition to conventional planned play areas. All of these spaces afford opportunities for play and a range of different experiences which are likely to appeal to particular groups of children. Studies of children's play have emphasised the appeal and use of unofficial play areas in addition to planned children's play areas.
- 11.2.3** Policy 3.6 of the London Plan seeks to ensure that all children and young people have safe access to good quality play space. A structured approach to the planning and provision of children's play areas has been developed by the National Playing Fields Association (NPFA). The standards of provision recommended by the NPFA were revised in 2001 and reflect changing views towards children's play provision. In particular the guidelines emphasise the need to provide both designated areas and casual play opportunities which respond to the needs of different age groups and which are of value to the development of children and young people.
- 11.2.4** The proposed standard for children's play should follow the GLA recommended standard of 10sqm per child, but with the inclusion of an element of formal children's playspace which is 0.48sqm per child, which should be used to:
- Provide Local Areas for Play (LAPs), Local Equipped Areas for Play (LEAPs) and Neighbourhood Equipped Areas for Play (NEAPs) in locations based upon walking time; and
  - Provide the balance as casual playing space within areas of amenity open space.

## 11 Green Infrastructure

- 11.2.5** The Council recognises the value of creating positive environments for young people and was a recipient of Sport/Play England funding to resource the creation of 28 areas of natural play around the borough for 8 – 13 year olds in 2010. This is in addition to the 45 existing LEAPs/NEAPS situated across the borough. It is recognised that play equipment should be provided to cater for all age brackets.
- 11.2.6** Applicants are advised to consult with the Council on proposed locations and refurbishment of play sites to ensure that local children and young people have been consulted and that the intended space meets all expectations. Opportunities may also exist for joint working and pooling of resources to create higher quality play facilities.

### 11.3 Playing Pitches

#### DRAFT DMD 74

##### Playing Pitches

- 1) The Council will continue to protect sports pitches in the borough. The preference for new sports pitches is natural grass pitches.
- 2) The Council will only permit artificial grass pitches if all of the following criteria are met.
  - (a) The location must be accessible by foot, road and public transport;
  - (b) The site must have adequate road access and be able to accommodate car parking
  - (c) The site must be level and have suitable ground conditions;
  - (d) The proposal must not harm the character or appearance of the area
  - (e) There is no harm to residential properties in terms of noise and light pollution
  - (f) There is no adverse impact on local flora and fauna
  - Applications for artificial pitches, incorporating flood lighting, on Metropolitan Open Land and in the Green Belt will be resisted.
  - Applications must be accompanied with details of proposed landscaping and enclosure and lighting. Applicants will be expected to demonstrate how lighting has been designed to avoid harm to biodiversity and local residents.
- 3) Proposals for ancillary features, such as changing rooms, must be essential to the enjoyment of the new sports pitches. The siting, location and design of buildings must be sympathetic and proportionate to the new facility;
- 4) Proposals involving the loss of sports pitches and associated facilities will be assessed against the following DMD policy: DRAFT DMD 71 'Protection and enhancement of Open Space'

This policy is in accordance with Core Strategy Policy 34.

#### Justification and guidance on implementation

- 11.3.1** There are currently 121 outdoor playing fields and sports facilities in the borough amounting to 684.6ha in various ownerships. Providing formal and informal space for outdoor sports is of growing importance to support the population's needs for established and emerging team sports. The Council will therefore, continue to protect and promote sports pitches across the borough to facilitate health, wellbeing and social cohesion.

## 11 Green Infrastructure

- 11.3.2** Over recent years the demand for sports pitches has been prevalent in those areas close to public transport, along transport corridors or within reach of a centre. However, issues have arisen over availability and the quality of facilities for participants. Artificial Grass Pitches have emerged around the borough offering smaller playing areas with artificially laid turf and floodlighting. Regular use results in minimal degradation to the artificial pitch, unlike natural pitches, and numerous games can be played well into the evening. Some of the negative aspects of these facilities include the loss of grass pitches, residential amenity issues with respect to light and noise pollution. It has also been shown that developments of this nature can have a negative effect on biodiversity and also on the character of a local area.
- 11.3.3** In the right location where there is no loss of soft landscaping, erosion of the local character and no ecological damage, artificial grass pitches can play a positive role in communities by reducing social exclusion and encouraging competitive sport, health and wellbeing. The proposed playing pitch standard to meet needs up to 2026 is 0.70ha per 1,000 population.

## 11.4 Waterways

### DRAFT DMD 75

#### Waterways

Major development proposed on or close to the riverside must protect and enhance the waterfront character and where applicable, river restoration (including de-culverting) should be considered as part of proposals.

Developments will be assessed on its ability to protect and improve physical and visual links between the river and the rest of the Borough.

Developments should support the proactive management of river corridors as important environmental resources (for flooding, ecology, local amenity), through provision of a publicly accessible riverside walk and or cycle route along with biodiversity enhancements as outlined in the Green Infrastructure Policy.

#### Moorings

Permanently moored vessels on the River will be permitted provided they meet all of the following criteria:

- (a) there is no harm to the intrinsic character of the river;
- (b) there is no detrimental impact on amenity arising from traffic generation or servicing needs;
- (c) there is no adverse impact on transport borne freight

#### Freight

The Council recognises that a realistic and sustainable alternative to the movement of freight by road is water, and is supported by London Plan policies on increasing the use of Blue Ribbon Network as a transport corridor. The Council is supportive of maximising the transportation of freight by utilising Enfield's connection to the Lee Navigation, where both industry and the Edmonton Eco-park are located.

#### Industrial or Commercial development

Industrial/commercial development which is exposed to a waterway should address the waterway and create pleasant and interesting views from that waterway. The buildings should take architectural cues from the heritage of these features and should present them with an attractive, and where possible, active façade to encourage passive surveillance. In addition, public access to the waterfront should be retained/introduced where possible, with access for staff maintained as a minimum.

This policy is in conjunction with Core Strategy Policies 34 and 35.

# 11 Green Infrastructure

## Justification and guidance on implementation

- 11.4.1** Waterways otherwise known as Blue Corridors are comprised of rivers, streams, brooks and canals. They provide habitat for a wide range of flora/fauna. The River Lee and Lee Navigation are of regional importance as they cross several local authority boundaries and are used for the transportation of freight and recreational uses. Enfield is fortunate to have approximately one hundred kilometres of watercourses; the greatest length of any London borough.
- 11.4.2** The Mayor of London's Blue Ribbon network supports London's rivers for a diverse range of uses and needs. The Council supports the Mayor's policy on the Blue Ribbon Network and will apply proposals in line with London Plan policies 7.24, 7.26, 7.27 and 7.28. The aims of the Water Framework Directive requires that all watercourses reach 'good ecological status' by 2015.
- 11.4.3** Historically, industrial areas have been located in close proximity to waterways, in order to facilitate the transport of goods to and from the facility. This led to a rich industrial heritage along the waterways. Many of the original buildings and features have been lost to make way for more efficient, yet architecturally poor, alternatives, and industrial areas have often turned their backs on the waterways. New developments should help to rediscover elements of this rich heritage and recognise their role in enhancing these waterways, which now predominantly act as a source of recreation for surrounding communities and those from further afield. Further information about the character of Enfield's waterways is set out in the Enfield Characterisation Study (2011).

## 11.5 Wildlife Corridors and Green Chains

### DRAFT DMD 76

#### Wildlife Corridors

Where a site abuts a wildlife corridor or where a wildlife corridor runs through the site, applicants will need to demonstrate how the wildlife corridor will be protected and enhanced as part of the development. Where proposals are in proximity to a Right of Way, opportunities to connect to the route should be properly assessed and where feasible, joined with as an additional Right of Way.

This policy is in conjunction with Core Strategy Policy 36.

## Justification and guidance on implementation

- 11.5.1** Wildlife corridors are continuous areas of open space situated within the built environment. They may be linked and are not always publicly accessible. They allow animals and plants to move through urbanised areas than would otherwise be the case. They also provide an extension to the habitats of the sites they join. Wildlife Corridors can include railway sidings, or watercourses.

### DRAFT DMD 77

#### Green Chains

The Council will continue to conserve and enhance the Green Chain designation as delineated on the Policies Map.

Proposed developments within a 5 minute walking/400 metres radius from a Green Chain should integrate sites to the Green Chain network to incorporate the principles set out in the Green Infrastructure policy. Developments must:

- (a) Minimise any adverse impact on the environment of the Green Chain;

## 11 Green Infrastructure

(b) Protect and improve the Green Chain route for cyclists, pedestrians, water users and flora and fauna; and,

(c) Create further accessible links that strengthen the role and function of the Green Chain. This can include bridging missing links.

This policy is in conjunction with Core Policy 34.

### Justification and guidance on implementation

**11.5.2** Green Chains are areas of linked open spaces accessible to the public and provide way-marked paths and other pedestrian and cycle routes. They enable flora and fauna to migrate further around the borough and further afield in order to support a much wider Green Infrastructure network. The definition covers anything from open spaces, footpaths, river corridors, canals/towpaths, bridleways, disused railways and railway sidings and can predominantly be found in or adjacent to the New River, Turkey, Salmons and Pymmes Brook and in the vicinity of Boxers Lake.

#### Green Chain Associated Open Space - seeking your views

Green Chain associated open space has been reviewed as part of the Development Management Document process. Some of these sites are proposed for MOL and changes are given in the Policies Map Document. An evidence paper explaining the rationale for these changes accompanies this document.

## 11.6 Biodiversity and Ecological Enhancements

### DRAFT DMD 78

#### Nature Conservation

The Council will protect and enhance biodiversity through the planning process, by:

- (a) Protecting and enhancing important ecological features;
- (b) Seeking provision of biodiversity enhancements in new developments; and
- (c) Seeking opportunities for access to natural areas and appreciation of nature, particularly in areas deficient in accessible natural green space.

Development proposals that directly or indirectly impact upon important ecological features will only be permitted where the harm cannot reasonably be avoided and it has been evidently demonstrated that appropriate mitigation can address the harm caused. Where this is the case, mitigation measures will be secured through planning obligations or conditions where appropriate.

This policy is in conjunction with Core Strategy Policy 36.

**11.6.1** The Council considers the following to be important ecological features:

- The King George and William Girling Reservoirs Site of Special Scientific Interest
- Sites of Importance for Nature Conservation (or sites that meet the criteria to be designated as such);

## 11 Green Infrastructure

- UK, London or the Enfield Biodiversity Action Plan Habitats or species;
- Species and habitats of principal importance, that is: Ancient Woodland; Veteran Trees; those habitats and species listed on Section 41 of the Natural Environment and Rural Communities Act; or species and habitats with UK, London or Enfield Biodiversity Action Plans

**11.6.2** Proposed developments will need to demonstrate how the features listed above have been incorporated into the scheme design and where possible enhanced. Major developments, in particular in areas deficient in access to nature (as defined in the London Plan), will be expected to incorporate or contribute to areas where people can access and enjoy nature.

**11.6.3** Development proposals where the principal objective is to conserve or enhance important ecological features will generally be permitted.

### ***The Chingford Reservoirs Site of Special Scientific Interest***

**11.6.4** The Chingford Reservoirs designated as a Site of Special Scientific Interest (SSSI) because of their importance for wintering wildfowl and wetland birds and are of national importance for conservation. They are of the highest priority for protection and development that would have an adverse impact on the reservoirs will not be permitted unless the needs for the development substantially outweigh the adverse impact on the site and the SSSI network as a whole.

### ***Sites of Importance for Nature Conservation***

**11.6.5** National planning policy for biodiversity and geological conservation recognises that local sites have a fundamental role to play in helping to meet overall national biodiversity targets. In London these sites are collectively known as Sites of importance for Nature Conservation (SINCs).

**11.6.6** SINCs are non statutory sites designated at a local or regional level for their importance for conservation. In London there are three tiers of such sites:

- Sites of Metropolitan Importance: these are the best examples of wildlife sites in London and are selected by the Mayor of London and his officers at the Greater London Authority.
- Sites of Borough Importance: selected at a borough level these are important wildlife sites for the borough.
- Sites of Local Importance: selected at a borough level these sites ensure that everyone has easy access to nature close to home.

**11.6.7** Government guidance states that local authorities should provide leadership in establishing and maintaining partnerships and systems to identify and manage Local Sites.

**11.6.8** The London Plan states that Boroughs should identify and secure the appropriate management of sites of borough and local importance for nature conservation in consultation with the London Wildlife Sites Board.

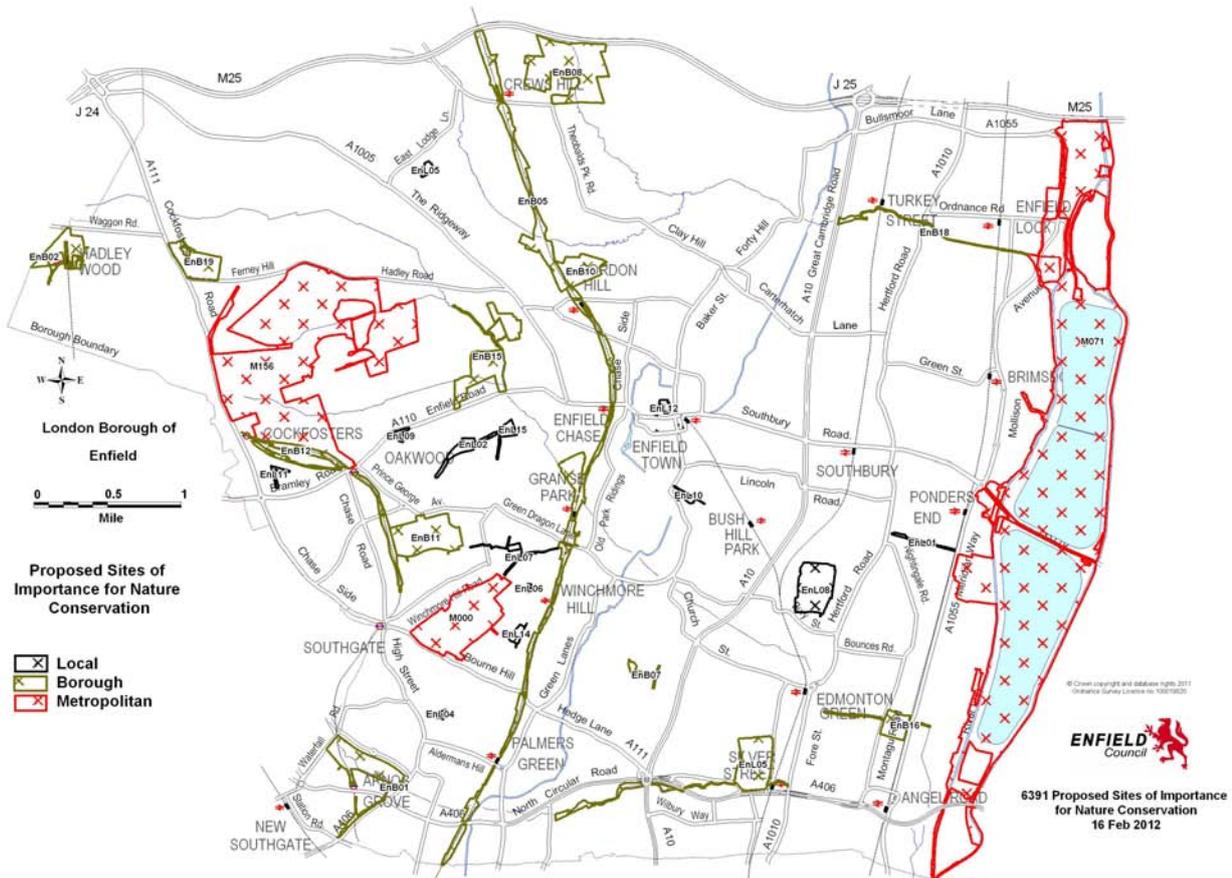
**11.6.9** The London Wildlife Sites Board guidance, in line with National Policy, states that proposed Local and Borough SINCs should be assessed by a Local Site Selection Panel whose responsibility it is to provide independent, expert advice on the approach to surveys and evaluation and to validate any recommendations on SINC status.

### **Review of Enfield's Sites of Local and Borough Importance for Nature Conservation (SINC) - seeking your views**

A review of SINCs across the borough has been undertaken by Enfield's Local Site Selection Panel. 18 new sites are proposed and for some sites changes are proposed to the boundaries and grades of existing designations. Further details are provided on the Policies Map and set out in the "Review of Enfield's Sites of Local and Borough Importance for Nature Conservation" report, which accompanies this draft DMD.

# 11 Green Infrastructure

Picture of Proposed Sites of Importance to Nature Conservation



**11.6.10** All local authorities have a duty under the Natural Environment and Rural Communities Act 2006 to have due regard to the conservation of biodiversity in exercising all their functions. The duty aims to make biodiversity conservation an integral part of policy and decision making.

**11.6.11** Clear aims for the maintenance, connection and extension of key habitats and species have been established through the London, UK Biodiversity Action Plan (BAP) and Enfield BAP.

## DRAFT DMD 79

### Ecological Enhancements

Where feasible, developments of more than 1 net additional dwelling or 100m<sup>2</sup> of floorspace (not including changes of use), shall provide ecological enhancements within the development site. Examples of such enhancements include, but are not restricted to, built in nesting opportunities for birds such as swift bricks/boxes, native and wildlife friendly landscaping, wildlife ponds, and biodiverse green roofs. Applicants will need to demonstrate compliance of this policy as part of a Sustainable Design and Construction statement in accordance with DRAFT DMD 3 'Sustainable Design and Construction Statements' and Appendix 1. The scale of enhancements required will reflect the scale of the proposed development.

This policy is in accordance with Core Strategy Policy 36.

# 11 Green Infrastructure

## Justification and guidance on implementation

- 11.6.12** An ecological enhancement is the modification of a site to provide habitat for plants and animals. Within new development there are numerous opportunities to design in enhancements for biodiversity, such as bird and bat boxes, ideally built into the fabric of the building, wildlife ponds, green roofs and wildlife friendly landscaping.
- 11.6.13** Providing ecological enhancements is not a “one size fits all”, nor is it a requirement just for large developments. All developments (not including changes of use), no matter the size of the site, are able to provide ecological enhancements to improve the biodiversity offer on that site. Enhancements could range from anything such as bird boxes to wildlife friendly landscaping or green roofs. The Council will expect ecological enhancements to be incorporated into developments and be in scale with the development proposed.

## 11.7 Trees and Landscaping

### DRAFT DMD 80

#### Trees on Development Sites

All development including subsidiary or enabling works that involve the loss of or harm to trees covered by a Tree Preservation Order, trees of significant amenity or biodiversity value and trees located in the public realm will be refused.

Where there are exceptional circumstances to support the removal of such trees, adequate replacement must be provided.

All development must comply with established good practice, guidelines and legislation on the retention and protection of trees. Proposals must:

- (a) Retain and protect trees of amenity and biodiversity value on the site and in adjacent sites that may be affected by the proposals
- (b) Ensure that the future long term health, and amenity of trees is not harmed
- (c) Provide adequate separation between the built form and trees, having regard to shading caused by trees.

#### Works to Protected Trees

Works to trees covered by a Tree Preservation Order or trees situated within a Conservation Area must ensure the long term of the tree, retain and enhance amenity value to the locality and comply with current arboricultural best practice, guidelines and legislation.

This policy is in conjunction with Core Strategy Policy 34.

### DRAFT DMD 81

#### Landscaping

Proposed development must provide appropriate high quality landscaping that enhances the local environment and maximises the potential space available for such schemes.

# 11 Green Infrastructure

Landscaping should add to the local character, benefit biodiversity, help mitigate the impacts of climate change and reduce water run-off.

Emphasis should be given to planting large, shade-producing trees and indigenous species where situations allow.

This policy is in accordance with Core Strategy Policy 34.

## Justification and guidance on implementation

- 11.7.1** Trees enhance the landscape and soften hard areas among buildings and other hard surfaces. Trees enhance visual amenity, help to moderate climate, temperature, sunshine and wind conditions by providing shade and shelter. Trees absorb carbon dioxide, filter and reduce harmful airborne pollution, reduce noise pollution and reduce water run-off thereby reducing the effects of flooding. They provide habitats for a broad range of wildlife, mark the changing of the seasons, provide a sense of well-being and place, provide health benefits, reduce crime and increase property prices.
- 11.7.2** New construction on existing sites or on development land commonly threatens the survival of trees. Trees may have to be removed to make way for new structures and landscaping but excavation, level re-grading and other changes to the soil environment can damage the roots of trees that remain, resulting in impaired growth or death.
- 11.7.3** Protection of trees from such damage enables preservation of their amenity value and maintenance of the benefits they provide in the urban eco-system. There may also be a legal requirement for tree retention and protection during construction, the advantages which will benefit developers, property owners and the community at large.
- 11.7.4** In the processing of planning applications the Council places a high regard for the retention of all trees of amenity and environmental value, taking consideration of both their individual merit and their interaction as part of a group or broader landscape feature.
- 11.7.5** Developers will be required to observe the constraints of a development site including trees both on site and on adjoining properties, their root systems, their crown spread, the wildlife that lives on them and the shade that tree crowns cast.
- 11.7.6** The impact of development including subsidiary or enabling works on trees will be a material consideration of any planning application within reasonable proximity to a tree.
- 11.7.7** In addition unnecessary or excessive pruning works or root disturbance for foundation excavations that would be required to enable a development to be constructed would be a material consideration in assessment for planning approval or refusal.
- 11.7.8** Where appropriate, provision must be made to increase tree cover on a development site and new tree planting and landscape schemes are encouraged with an emphasis to plant large, shade-producing trees and native trees where situations allow following the principle of 'right place, right tree' as set out in the London Plan (through the London Tree and Woodland Framework). In addition consideration must be taken into account for any future maintenance requirements of any trees planted and how the trees may impact on the development, users, residents and adjoining properties and vice versa.
- 11.7.9** Where applicable, it will be appropriate for applicants to ensure that a report on the measures to be taken during construction to safeguard the retained trees is in accordance with BS: 5837 (2005) "Trees in relation to construction" and any subsequent revisions.
- 11.7.10** Applicants are advised to seek qualified expertise through an appropriate arboricultural practice prior to the initial design phase.

## 11 Green Infrastructure

- 11.7.11** The Council's Characterisation study identifies numerous and different characters prevalent in the borough, including industrial areas and retail parks where an attractive landscape will improve the whole environment. Applications should be consistent in their approach to landscaping in relation to its particular setting and character. Particular attention should also be paid to the materials and vegetation proposed to ensure the proposal conserves and enhances the area.
- 11.7.12** The Council's Tree Strategy will include criteria for highway related works including vehicular crossovers. Applications proposing the construction of, or modification of vehicular crossovers where trees are involved should refer to the Tree Strategy at the initial design phase.

# 11 Green Infrastructure

# Green Belt

## 12 Green Belt

# 12 Green Belt

## 12.1 Protecting the Green Belt

- 12.1.1** The Green Belt is an area of land, near to and sometimes surrounding a town which is kept permanently open by placing a permanent or severe restriction to any form of building within it.
- 12.1.2** The fundamental aim of the Green Belt is to prevent urban sprawl, the essential characteristics of Green Belt land is their openness and permanence as established in the National Planning Policy Framework (NPPF). The NPPF carries forward from previous guidance the five purposes of including land in Green Belts:
- to check the unrestricted sprawl of large built up areas;
  - to prevent neighbouring towns from merging into one another;
  - to assist in safeguarding the countryside from encroachment;
  - to preserve the setting and special character of historic towns; and
  - to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

### Enfield's Detailed Green Belt Boundary Review - seeking your views

The Council has undertaken a Green Belt boundary review to examine both the accuracy and durability of the detailed inner and outer Green Belt boundary.

Minor additions and deletions to the Green Belt designation are proposed with the aim of securing a strong defensible boundary that will endure over the next 15 to 20 years. Further details are provided in the Policies Map document and "Enfield's Detailed Green Belt Boundary Review" report.

### DRAFT DMD 82

#### Protecting the Green Belt

Applications for inappropriate development within the Green Belt will be refused. Appropriate uses will be permitted if the development meets all of the following criteria:

- (a) The siting, scale, height and bulk of the proposed development is sympathetic to and compatible with the prime aim of preserving the openness of the Green Belt;
- (b) The development displays a high standard of design and landscaping to complement and improve its setting and takes all measures to ensure that the structure(s) minimises its visual impact on the setting of the Green Belt;
- (c) The nature, quality, finish and colour of materials blend with the local landscape to harmonise with surrounding natural features;
- (d) That no detrimental impact comes to the flora and fauna on site and nearby or where this is impossible, be minimised to a satisfactory standard;
- (e) That existing trees, hedges, bushes and other natural features are retained as far as possible so that they integrate with the scheme to ensure adequate screening. A site specific management plan should accompany proposals.

Green Belt Site Assessment and Management Plans will be required to be submitted as part of the design and access statement for all developments within the Green Belt.

## 12 Green Belt

This policy is in accordance with Core Strategy Policy 33.

### Justification and guidance on implementation

**12.1.3** The National Planning Policy Framework reiterates previous Green Belt policy by stating that inappropriate development is, by definition, harmful to the Green Belt. The construction of new buildings in the Green Belt are generally not to be supported, exceptions to this are:

- Agriculture, Horticulture and forestry
- Essential facilities for outdoor sport, outdoor recreation and cemeteries and for other uses of land which preserve the openness of the Green Belt and which do not conflict with the purposes of including land in it
- Limited extension, alteration or replacement of existing dwellings
- Appropriate re-use of buildings
- Appropriate engineering and other operations

**12.1.4** There are some situations that may allow certain developments to take place in the Green Belt that under any other circumstances would not be allowed. These are known as ‘very special circumstances’ and if proven, are treated as a departure from the Local Plan. When attempting to prove very special circumstances the onus is on the applicant to prove that the exceptional nature of the proposal outweighs the harm that it would cause to the Green Belt.

### **12.1.5 Green Belt Site Assessment and Management Plans**

**12.1.6** The appearance of the Green Belt depends on the use of the land as well as the activities. Degradation in the quality of the Green Belt landscape can occur where poor design of the use is inconsistent with the rest of the landscape. The objectives that land uses in the Enfield Green Belt should aim towards are set out below:

- to provide opportunities for access to the open countryside for the urban population;
- to provide opportunities for outdoor sport and outdoor recreation near urban areas;
- to retain attractive landscapes, near to where people live;
- to improve damaged and derelict land around towns;
- to secure nature conservation interest; and
- to retain land in agricultural, forestry and related uses

**12.1.7** The extent to which the use of land fulfils these objectives is not itself a material factor in the inclusion of land within a Green Belt, or in its continued protection. However, the Enfield Characterisation Study makes reference to the build up of objects which clutter and overall reduce the attractiveness of the Green Belt. The Council will therefore require applicants to submit a Green Belt Site Assessment and Management Plan to demonstrate that the proposed and future management of the site will address issues of; visually unattractive structures, degradation of the land, lost ecology, operational practices, protection and enhancement of the Green Belt landscape with the aim of keeping the Green Belt open. By taking this positive stance towards improving the landscape, the policy seeks to build upon a partnership between local authorities, other public bodies, voluntary groups, farmers and landowners in its ambition to protect the Green Belt. The amount of information to be submitted by applicants should be in scale with the size and type of the proposed development. Applicants will be required to enter into a binding agreement to honour the terms of the Green Belt Site Management Plan. Conditions will be imposed to ensure the implementation of the site management plan is implemented.

### **Green Belt Site Assessment and Management Plan**

All new development proposals will be assessed on the basis of a comprehensive Green Belt Site Management Plan that includes how the operation of the use will affect the following:

## 12 Green Belt

- A How the scale of the development reduces its visual impact on the Green Belt;
- B How the proposal improves the attractiveness and quality of the landscape and builds in as much soft landscaping as possible;
- C How the management of the land will increase the local biodiversity;
- E That where the opportunity allows, that footpaths / bridleways / cyclepaths are created to allow public access;
- F That where the opportunity allows, options for incorporating Hedgerows and tree planting of native species are incorporated into the scheme;

### 12.2 Urban Fringe

#### DRAFT DMD 83

##### The Urban Fringe

Proposed developments located next to or within close proximity to the Green Belt will be resisted unless all of the following criteria are met:

- (a) there is no increase in the visual dominance and intrusiveness of the built form by way of height, scale and massing
- (b) there is a clear distinction between the Green Belt and urban area;
- (c) views and vistas from the Green Belt into urban fringe areas and vice versa, especially at important access points are maintained;

Proposals should maximise opportunities to incorporate measures to improve the character of the urban fringe including environmental improvements (such as planting and earth moulding) and the removal or replacement of visually intrusive elements such as buildings, structures, hard standings, walls, fences or advertisements

Where possible proposed development should increase opportunities for public access. Development must not hinder future public access/rights of way from being provided at a later date.

This policy is in conjunction with Core Policies 31 and 33.

#### Justification and guidance on implementation

- 12.2.1** The urban fringe is the boundary zone outside the urban area where urban and rural land uses intermix. It is an area of transition from agricultural and other rural uses to urban uses. The urban fringe in Enfield is characterised in different ways; in the north-west (Hadley Wood), is mainly comprised of large residential plots interspersed by large areas of woodland and parkland all in the Green Belt. In the west of the borough (Cockfosters and Oakwood), urban areas are both separated from the Green Belt by infrastructure which combined with the conservation area and large areas of Green Belt such as Trent Park maintains a clear separation. Towards the centre of the borough, large health and education institutions straddle both urban and Green Belt landscapes. The characteristics of this largely rural area is interspersed and unclear in some parts. In contrast, towards the east (Forty Hall) the area is less vulnerable to change due to its historic nature. The east of the borough is generally characterised by low lying land with predominantly large areas of greenspace providing the Green Belt boundary towards

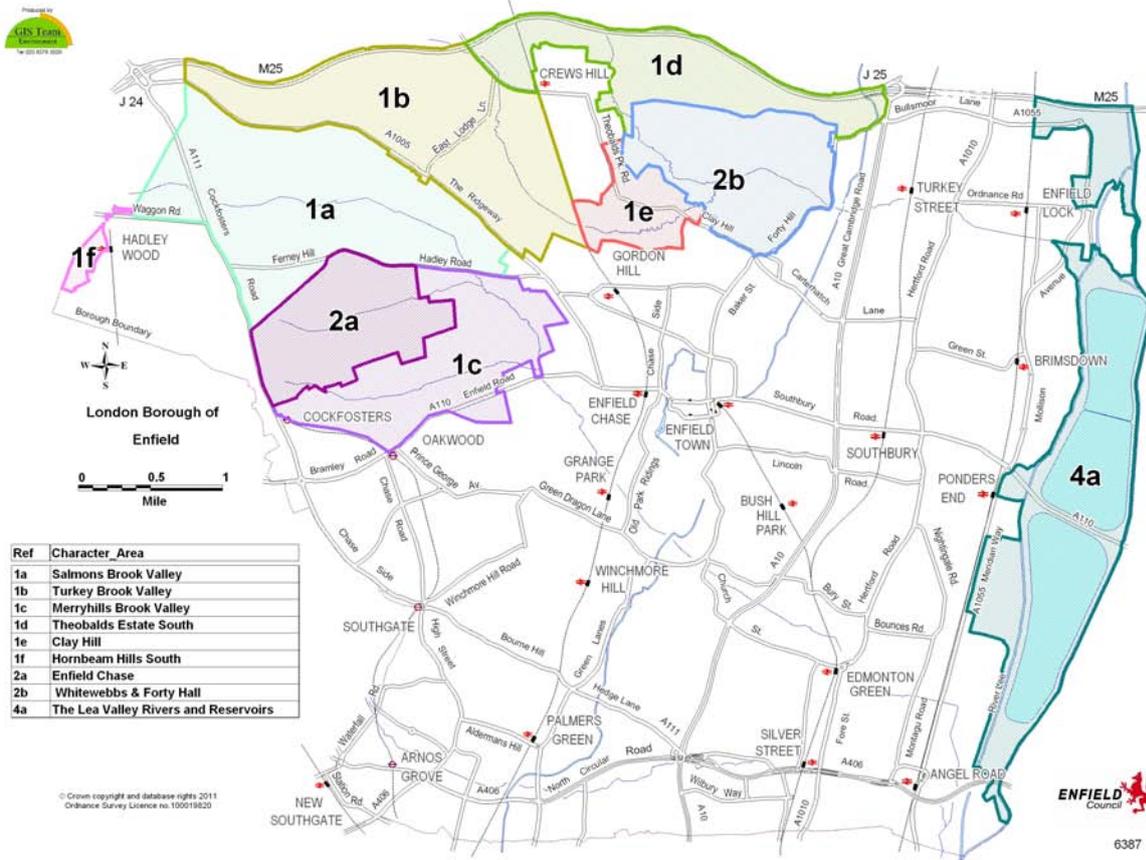
# 12 Green Belt

the Lee Navigation channel, Enfield Island Village and assortment of industrial uses. The South east continues this pattern of development with the Green Belt running along the South east border taking in the King George V and William Girling Reservoirs that form part of the Lee Valley Regional Park. Over time the characteristics have changed from being a largely rural settlement to a more urban one. Problems stem from competing land uses and constant pressures for new development.

- 12.2.2** Conclusions from the Enfield Characterisation Study suggest that changes in land uses that threaten established patterns through the blurring and stretching of boundaries between land use and character should be resisted. The Council will seek to protect the urban fringe for its unique high landscape quality and historic value of the Borough’s Green Belt and the regional significance of the rural areas in the borough by preserving a clear interface between urban and rural in order to support high quality gateway schemes and avoid the detrimental impact of creeping development at the edges of the urban area.

## 12.3 Areas of Special Character

Map of areas of Special Character



### DRAFT DMD 84

#### Areas of Special Character

New development within the following Areas of Special Character defined on the Policies Map must respect those features or characteristics which are key to maintaining the historic and intrinsic visual quality of the area:

## 12 Green Belt

- Salmons Brook Valley
- Turkey Brook Valley
- Merryhills Brook Valley
- Theobalds Estate South
- Clay Hill
- Hornbeam Hills South
- Enfield Chase and Trent Park
- Whitewebbs Park and Forty Hall
- Lee Valley Reservoirs

In particular, proposals will be assessed against how the proposal preserves and enhances the Area of Special Character based on one or more of the following criteria:

- The development harmonises with the design features, materials, architectural style and building heights local to the area.
- The development conserves and enhances the overall character and appearance of the area with identifiable or distinctive features that are worthy of preservation.

This policy is in conjunction with Core Strategy Policies 30, 31 and 33.

### Justification and guidance on implementation

- 12.3.1** For a London metropolitan borough, Enfield has an unusually rich and diverse range of landscape types. Most London boroughs have few substantial areas of undeveloped landscape of which, is often of poor quality urban fringe land that is poorly managed and lying dormant. This borough has a unique character influenced strongly by its topography and balance of development and largely rural landscape in London. It is crossed and connected by a series of historic connections and major routes and there is a need to ensure these routes continue to provide a focus and a sense of place for local centres and support the network of local connections. There are parts of the borough which are important for their character and the contribution which they make to the local environment. These areas are comprised of older development, areas with a particular landscape character or layout, or areas where trees, hedgerows and bushes are particularly important in retaining a rural character.
- 12.3.2** Information of the characteristic traits for each of Enfield's Areas of Special Character can be found in the Enfield Characterisation Study (2011).

#### Areas of Special Character designation - seeking your views

Based on evidence contained in the Enfield Characterisation Study (2011) the Council is proposing to replace the existing Unitary Development Plan Area of Special Character Designation with new designations for Areas of Special Character. Further information is set out in the Policies Map document and "Areas of Special Character" Report which accompany this draft DMD.

## 12.4 Agriculture

### DRAFT DMD 85

#### Land for Food and Other Agricultural Uses

The use of land for growing food, including commercial and community food growing, will be supported throughout the borough.

## 12 Green Belt

The Council will protect, encourage and support the use of agricultural land for its intrinsic character, beauty and the resource it provides to the agriculture industry.

Development on agricultural land will be permitted if the all of the following criteria are met:

- (a) The proposal delivers diverse and sustainable farming enterprises without harming the quality or character of the countryside;
- (b) Agri-environmental stewardship schemes are implemented to ensure good environmental practice, including long term biodiversity benefits;
- (c) The proposal safeguards high quality agricultural land from irreversible development;
- (d) Proposals in relation to renewable energy sources do not over farm the land to the detriment of the local character and ecology; and
- (e) The type and volume of traffic generated would not result in danger or inconvenience on the public highway or harm the rural character of local roads.

Proposed building(s) for agricultural uses must be of a high standard of design incorporating high sustainable credentials. The type and scale of the proposed building(s) must ensure that it makes a worthwhile contribution towards maintaining or improving the quality of the open environment.

This policy should be read in conjunction with Core Strategy Policy 33.

### Justification and guidance on implementation

**12.4.1** There are 12,064 hectares of farmland in Greater London, of which 1,449 hectares (12%)<sup>(20)</sup> is located in Enfield. This commercial farmland is primarily used for the production of arable and horticultural crops. Whilst much of the land use activity in the countryside is outside the scope of the planning system, planning plays an important part in supporting and facilitating development and land uses which enable those who earn a living from, and help to maintain and manage the countryside, continue to do so. The Council recognises the issues associated with maintaining a viable business and promotes flexibility in the diversification of agricultural land as long as it is subsidiary to the primary function of the land and is an appropriate land use in the Green Belt. As such, the Council will take a restrictive approach to the loss of high quality agricultural land.

**12.4.2** There is a long history of agriculture and horticulture in the Borough, which has played an important role in how Enfield has developed. The food sector continues to be an important contributor to Enfield's economy, with a range of small-scale producers, wholesalers and large companies generating significant income and providing many jobs. There is potential for better communication and future growth across the supply chain. The implementation priorities of the Enfield and the Mayor's Food Strategies seek to develop and maintain a thriving local food economy and promote food production in appropriate areas.

### DRAFT DMD 86

#### Agricultural Workers' Dwellings

Proposals for new dwellings for agricultural and horticultural workers will only be permitted if all of the following criteria can be met:

- (a) The Council is satisfied that the associated agricultural unit is economically viable, and has sound long-term prospects (statements of intent are not sufficient);

## 12 Green Belt

(b) It can be shown that the dwelling is essential to sustain the viability of the farming enterprise: need for 24-hour supervision of livestock or of plants growing under glass is proved to the satisfaction of the Council;

(c) There is no suitable alternative accommodation in the locality;

(d) No existing dwelling serving the holding by being sold, leased or disposed of in any other way

If the following criteria are met, planning permission will be issued for temporary building for a period for no more than 3 years to enable a further assessment to be carried out. An application for a permanent building will then be considered. The dwelling must not exceed 100 sq metres in floorspace except in very special cases. Proposals will be subject to an agricultural worker occupancy condition.

This policy should be read in conjunction with Core Strategy Policy 33.

### Justification and guidance on implementation

**12.4.3** Proposals for residential use in the Green Belt may be justified when accommodation is required to enable agricultural or horticultural full-time workers to live at, or in the immediate vicinity of their place of work. It will often be as convenient and more sustainable for such workers to live in nearby towns or villages, or suitable existing dwellings, so avoiding new and potentially intrusive development in the countryside. However, there will be some cases where the nature and demands of the work concerned make it essential for one or more people engaged in the enterprise to live at, or very close to, the site of their work. Whether this is essential in any particular case will depend on the needs of the enterprise concerned and not on the personal preferences or circumstances of any of the individuals involved. It is essential that all applications for planning permission for new occupational dwellings in the countryside are scrutinised thoroughly with the aim of detecting attempts to abuse (e.g. through speculative proposals) the concession that the planning system makes for such dwellings. In particular, it will be important to establish whether the stated intentions to engage in farming, forestry or any other rural-based enterprise, are genuine, are reasonably likely to materialise and are capable of being sustained for a reasonable period of time. It will also be important to establish that the needs of the intended enterprise require one or more of the people engaged in it to live nearby.

**12.4.4** If permission for temporary accommodation is granted, permission for a permanent dwelling should not subsequently be given unless clear evidence that the proposed enterprise has been planned on a sound financial basis. Upon expiry of the 3 – year time limit, the temporary building must be removed and the land reverted back to a landscape of rural character.

### DRAFT DMD 87

#### Equine- related development

Proposals for equine related development in the Green Belt, will only be permitted if all of the following criteria are met:

(a) There must be no adverse effect on landscape or nature conservation quality;

(b) The agricultural land quality must be maintained;

(c) Adequate arrangements must be made for the management of grazing areas;

(d) The size, scale and number of stables and other paraphernalia associated with the use are essential and do not detract from the openness of the Green Belt;

(e) Hard-surfaced areas should be kept to a minimum.

This policy should be read in conjunction with Core Strategy Policy 33.

## 12 Green Belt

### Justification and guidance on implementation

- 12.4.5** Horse riding is a popular recreational activity and a number of sites in the Borough are used for horsekeeping. The paraphernalia associated with horsekeeping such as excessive stables and urbanised ménage can be inappropriate if they detract from the openness of the Green Belt. Proposed horse-keeping associated uses must ensure that they are essential to support the operation of the use to avoid excessive buildings that could bring about negative visual impact to the Green Belt setting.

#### DRAFT DMD 88

##### Farm Diversification

Farm diversification schemes involving the change of use from agriculture to other business uses, which contribute to sustainable development and help to sustain the agricultural industry will be supported.

Applications involving the change of use from agricultural will only be permitted if all of the following criteria are met:

- (a) That agriculture remains the dominant use within the holding;
- (b) Building requirements are met through the re-use or replacement of existing building(s);
- (c) The proposed use improves the open land character by way of scale, location and design and would respect and preserve the openness and character of the Green Belt;
- (d) The proposed use does not generate excessive traffic/ or a significant number of additional trips;
- (e) The proposed use does not prejudice future opportunities for the land to revert back to agriculture use;
- (f) The proposed use does not unacceptably impact upon the amenities of residents or cause an unacceptable level of noise, light, air, water pollution or water quantity;
- (g) The proposed use provides adequate landscaping and screening to minimise its visual impact;
- (h) There will be no detrimental impact on nature conservation, wildlife habitats and historic features;  
and

Proposals that support the encouragement of tourism and increase opportunities for outdoor sport and recreation will be looked at favourably.

This policy should be read in conjunction with Core Strategy Policies 12 and 33.

### Justification and guidance on implementation

- 12.4.6** The Council recognises that diversification to non-agricultural uses is vital to the continuing viability of many farm enterprises. The Council will support well-conceived farm diversification schemes for business purposes that contribute to sustainable development objectives and help to sustain the agricultural enterprise. Proposals for diversification in Green Belts where the development preserves the openness of the Green Belt and does not conflict with the purposes of including land within it will be considered acceptable.

## 12 Green Belt

### 12.5 Cemeteries and Memorial Gardens

#### DRAFT DMD 89

##### **Cemeteries & Memorial Gardens in the Green Belt**

Cemeteries and memorial gardens with essential small scale buildings are usually acceptable in the Green Belt. New proposals in the Green Belt should take advantage of existing site contours, taken together with landscaping and screening to prevent memorials being seen in long views and where the openness or visual amenity of the Green Belt could be harmed.

Proposed developments should be well located close to the highway network.

Appropriate parking provision, safe access, egress and landscaping must be incorporated in proposals to ensure that the vehicles are safely parked in off-street locations and that the development does not prejudice the openness of the Green Belt. In suitable locations, woodland and green burial sites would be preferred.

This policy should be read in conjunction with Core Policy 33.

### 12.6 Developed Sites in the Green Belt

#### DRAFT DMD 90

##### **Previously Developed Sites in the Green Belt**

Proposals to re-use previously developed sites within the Green Belt will be assessed in relation to the criteria set out below.

- (a) The proposal should have no greater impact on the purposes of including land in the Green Belt than the existing development;
- (b) The proposal should not exceed the height of any existing buildings;
- (c) The proposal should not lead to an increase in the developed proportion of the site;
- (d) The proposal should be ancillary to, or support an existing building and should not detract from the appearance of the site;
- (e) The proposal should not lead to any significant increase in motorised traffic generation and will need to be evidenced through a suitable traffic modelling tool;
- (f) That the proposal contributes to the achievement of objectives for the use of land in the Green Belt as set out in Core Policy 34 in the Enfield Plan Core Strategy;
- (g) The proposal contributes towards the aims of sustainable development.

##### **Major Developed Sites in the Green Belt**

Major Developed Sites within the Green Belt are defined on the Policies map as Trent Park University Campus and Picketts Lock.

## 12 Green Belt

The complete or partial redevelopment of major developed sites may offer the opportunity for environmental improvement without adding to their impact on the openness of the Green Belt. However, applicants should have regard to policies concerning listed buildings and the preservation of gardens and grounds of special historic interest. Priority is for the re-use of existing buildings where the buildings are of architectural or historic interest.

The policy requirements set out for previously developed sites within the Green Belt will apply to Major Developed Sites. Proposed development within Major Developed Sites should not occupy a larger area of the site than the existing buildings unless this would achieve a reduction in height which would benefit visual amenity.

This policy should be read in conjunction with Core Strategy Policy 33.

### Justification and guidance on implementation

- 12.6.1** Within the NPPF, previously developed sites in the Green Belt and Major Developed Sites in the Green Belt are now for national policy purposes considered the same. Bullet point six, Paragraph 89, advises that the limited infilling or the partial or complete redevelopment of previously developed sites (excluding temporary buildings), whether redundant or in continuing use, which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development could be acceptable. This is in contrast to the approach of previous national policy guidance of PPG2 which restricted infilling or complete or partial redevelopment to sites identified in DPDs as Major Developed Sites in the Green Belt.
- 12.6.2** It is considered that a two tier approach is required to protect the Green Belt and deliver sustainable forms of development. The local policy approach above provides the level of protection for the countryside and to facilitate the Council's urban regeneration priorities. It also serves to provide the flexibility required for the two Major Developed Sites within the Green Belt identified in the Core Strategy.

## 12.7 Crews Hill Defined Area

### DRAFT DMD 91

#### Crews Hill Defined Area

The aim of the Crews Hill Defined Area is to control and shape the future of Crews Hill as a useful and integral component of Enfield's Green Belt.

Garden centre activities within the Defined Area will only be permitted where there will be significant environmental advantages and where the activities can be controlled to prevent diversification into inappropriate product lines

Proposals for intensive livestock units in the Defined Area will be only be permitted on existing glasshouse sites which are not directly adjacent to the Crews Hill residential estate.

Proposals for residential development, including the change of use of existing buildings, within the Defined Area (outside of the Crews Hill residential estate) will be refused.

This policy should be read in conjunction with Core Strategy Policy 33.

## 12 Green Belt

### DRAFT DMD 92

#### Re-use of buildings in the Crews Hill Defined Area

Proposals for new garden centres on sites which have become redundant or no longer required for horticultural uses, within the Defined Area will be only be permitted if all of the following criteria are met:

- a. In the case of a replacement building; the new building is not materially larger than the one it replaces;
- b. There is no external display or sale of goods other than trees, shrubs or other plants or similar horticultural products;
- c. Any other goods requiring external display either related directly to gardening, such as greenhouses, garden sheds, paving or rockery stones or related to leisure in the garden, must not be sited on a main road or any other position that would be visually intrusive or compromise traffic safety;
- d. Advertisement displays on the site should be appropriate to, and in scale with, the road frontage of the premises and should complement the area;
- e. Not less than 90% of the sales floorspace should be used for the sale of plants, bulbs, seeds and plant materials (whether for indoor or outdoor use), equipment, structures and products required for the purposes of gardening or the laying out of a garden
- f. Not more than 10% of the sales floorspace should be used for the sale of other goods, provided that such goods are primarily products or services which enhance the enjoyment of the garden itself, but may not be directly related to the activity of gardening; and
- g. They have undergone a sequential approach to site selection, assessing potential sites for their availability, suitability and viability and their ability to meet the full extent of assessed quantitative and qualitative needs.

This policy is in conjunction with Core Strategy Policy 33.

#### Justification and guidance on implementation

- 12.7.1** Crews Hill is widely regarded as the largest horticultural retail trading area in Europe. There are in the region of 40 traders of different size and operation which cater for different markets. Collectively, Crews Hill traders sell both wholesale and retail horticultural goods. This attraction of Crews Hill especially at the weekends can cause significant congestion on local roads and particularly on Cattlegate Road.
- 12.7.2** Within the Crews Hill Defined Area the normal planning considerations with respect to Green Belt policy will apply. The main purpose of the Crews Hill Defined Area is to keep land open and free from development, to maintain the character and identity of individual settlements and to make a clear distinction between rural and urban environments, in support of Core Strategy policy 33.
- 12.7.3** The Council acknowledges that exceptional circumstances may be presented by the need for diversification of the farming industry and for continued business growth in the Crews Hill defined area. A comprehensive Area Action Plan for the Crews Hill area will be prepared to address the long term future for this developing area in the Green Belt.
- 12.7.4** Horticultural use does not normally require planning permission within the Green Belt. However, when businesses import and sell goods other than the produce grown on site, it is classified as development requiring planning permission. The Council recognises that the principal activity of horticulture alone can cause the associated glasshouses to fall into dis-use. Recognising that diversification into non-agricultural facilities is vital to the continuing viability of many farm enterprises, the Council will be supportive of well-conceived alternative uses for glasshouses to ensure the horticultural industry continues to thrive in the Crews Hill area. Proposals such as garden centres have shown to be an acceptable use in the Crews Hill Defined Area where the sale of homegrown produce remains the primary use. Development proposals must contribute towards sustainable development, help to sustain the agricultural enterprise, preserves the openness of the Green Belt and is consistent in scale with its rural location.

## 12 Green Belt

- 12.7.5** The location of intensive livestock units can sometimes result in a serious erosion of landscape quality and nature conservation value due to over-use of the land. High standards of design, construction and maintenance of buildings and care of land are therefore necessary to ensure that such intensive activities do not have adverse effects on the countryside and the aims of the Green Belt policy. As such, the Crews Hill Defined Area has a number of redundant glasshouses which could be redeveloped to provide a location for intensive livestock units.
- 12.7.6** Proposals must reduce the overall mass and scale of the existing buildings on site whilst seeking to restore the site back into its rural character through the careful application of landscaping, design and materials of the replacement building.

### DRAFT DMD 93

#### Improving the general appearance of the Crews Hill Defined Area

New development within the Crews Hill Defined Area should preserve the openness of the Green Belt. Development proposals must meet all of the following criteria:

- (a) Roadside and field boundary hedges, particularly along Theobalds Park Road or Cattlegate Road should be retained or reinstated wherever possible. Existing features should be augmented by appropriate additional landscaping to reinforce boundaries, screen and integrate adjacent sites.
- (b) Landscaping, means of enclosure, architectural detailing should be used to create a pleasant and safe rural environment for pedestrians, cyclists and vehicles at all times of the day
- (c) Servicing and refuse storage should be located sensitively and screened where possible.
- (d) All advertisements must be of an appropriate size and type in relation to the premises and to the street scene
- (e) External materials should be of high quality. Local materials should be used to create a distinct character and area identity.

This policy is in conjunction with Core Strategy Policy 33.

#### Justification and guidance on implementation

- 12.7.7** The distinctive characteristics and typology of the Crews Hill area are identified in the Enfield Characterisation Study (2011). This has been used to inform this policy, with the aim of ensuring that future development contributes towards improving the appearance of this sensitive area of the Green Belt.

## 12 Green Belt

# **Sustainability Appraisal**

## 13 Sustainability Appraisal

### 13 Sustainability Appraisal

- 13.0.1** A sustainability appraisal of each policy is set out in the Sustainability Appraisal Report which accompanies this document.

## Evidence Base

### Evidence Base

In addition to the documents listed in Appendix 4 of the Core Strategy, the following documents and studies have informed the Draft Development Management Document (DMD).

#### National Planning Policy

- National Planning Policy Framework (NPPF) (2012)
- Draft National Planning Policy Framework (NPPF) (2011)
- Manual for Streets 2: Wider applications of principles (Chartered Institute of Highways and Transportation, Department for Transport) (2010)
- PPS 5: (2011) Planning for the Historic Environment (replaced by NPPF)
- PPS 3 (2011) Housing (replaced by NPPF)
- PPG13 (2011) Transport (replaced by NPPF)
- PPS25 (2011) Development and Flood Risk (replaced by NPPF)

#### Regional plans and policies

- Draft Climate Change Adaptation Strategy (GLA) (2010)
- Green Expectations: London's Low Carbon Job Prospects (LDA) (2010)
- London Housing Design Guide (GLA) (2010)
- London Plan (2011)
- Mayor's Economic Development Strategy for the London Development Agency (May 2010)
- Mayor's Transport Strategy (2010)
- Upper Lee Valley Opportunity Area Planning Framework (GLA) (November 2011 Draft)

#### Local plans and policies

- Childhood Healthy Weight Strategy (Draft) (2011)
- Child and Family Poverty Action Strategy (LBE) (2011)
- Draft Housing Strategy (LBE) (2012)
- Draft Sustainability Programme (LBE) (2012)
- Draft Surface Water Management Plan (LBE) (2011)
- Draft Young Peoples Plan (LBE) (2011-2015)

Enfield - A Fairer Future for All. Council Business Plan 2011/2014

- Food Strategy (LBE) (2011)
- Joint Strategic Needs Assessment (Enfield PCT) 2010-2012
- Local Economic Assessment (LBE) (2011)

## Evidence Base

- Local Implementation Plan and Enfield's Transport Strategy (2011)
- Market Statement (LBE) 2011

### Local Studies

Table .1

<b>Project</b>	<b>Objectives</b>
Affordable Rent: Development Management Background Paper (2012)	Identify to what extent the new affordable rent product will meet housing need.
Areas of Archaeological Importance Review (2012)	Identifies and recommends proposed changes to Areas of Archaeological Importance
Employment Land Review (2012)	Review market demand for designated employment sites. Provide up to date evidence to justify protection of employment sites.
Enfield Characterisation Study (2011)	To describe the form, character and special attributes of Enfield borough.
Areas of Special Character Review (2012)	Identifies and recommends proposed changes to Areas of Special Character.
Town Centre Uses and Boundaries Review (2012)	Set appropriate boundaries for district centres, local centres and shopping parades.
Surface Water Management Plan (2012)	Identify areas at risk of surface water flooding.
Pre-feasibility Study of the Viability of a Decentralised Energy Network in the Context of the Upper Lee Valley (2011)	Assess feasibility of developing DENs particularly in the Upper Lee Valley. To ensure that networks are secured through the planning application process.
Enfield Open Space and Sports Assessment Update (2011)	Inform designation of sites for protection. Establish open space standards for new development including standards for children's play.
Open Space Policies Map Paper (2012)	Report details of new open space sites, changes to existing boundaries and deletion of existing open spaces.
Metropolitan Open Land and Green Chain Associated Open Space Review (2012)	Create robust and defensible boundaries to protect MOL and to recommend the designation of Green Chain Associated Open Space as MOL where they meet the GLA criteria.
Review of Enfield's Sites of Local and Borough Importance for Nature Conservation (2012)	Designate sites for protection according to approved criteria.
Enfield's Detailed Green Belt Boundary Review (2011)	Create robust and defensible boundaries to protect the Green Belt.
Report on Location of Tall Buildings and Important Local Views in Enfield (2012)	Identify appropriate; inappropriate and sensitive sites for tall buildings and important local views for use in decision making.
CIL Economic Viability Work (draft)	To ensure that costs involved in complying with DMD policies in the setting of CIL charges do not make developments unviable.

# Sustainable Design and Construction Statements

## Sustainable Design and Construction Statements

All development proposals must be accompanied by a Sustainable Design and Construction Statement, outlining how the proposal complies with relevant local, regional and national sustainable design and construction policies and should include as a minimum information and evidence (where relevant under the following headings):

### A. Energy Statement

The sustainable design and construction statement will be required to include an Energy Statement for all developments to demonstrate how the development has minimised on-site CO<sub>2</sub> emissions in accordance with the principles of the energy hierarchy to achieve the requirements of Core Policy 20

Energy assessments should include the following details:

1. A calculation of baseline energy demand and carbon dioxide emissions (or Target Emission Rate) for regulated energy;
2. Outline measures taken to reduce the energy demand of the development through energy efficient design of the site, buildings and services;
3. Demonstrate the feasibility of further reductions in carbon dioxide emissions through the use of decentralised energy sources in accordance with **DRAFT DMD 51 'Decentralised Energy Networks'**;
4. Where necessary, demonstrate the feasibility of utilising Low or Zero Carbon Technologies after all possible savings have been secured through points 1-3 above

Separate sections under each of the points will need to take account of unregulated energy uses (as derived from appliances not covered by Building Regulations) and developers will be required to show how, as a result of development energy consumption and consequently carbon emissions have been reduced.

If it can be demonstrated that the achievement of relevant energy targets is not technically feasible or economically viable, the Energy Statement will be required to express the shortfall in tonnes of carbon/year and, in accordance with the formula adopted by the S106 SPD, a calculation of the cost to off-set the remaining carbon over the lifetime of the development (currently set at 30 years).

Where developers are seeking to off-set an identified shortfall through near-site enhancement options, including refurbishment of existing properties, the Energy Statement must contain clear calculations of the amount of carbon that is saved as a result of works. This figure must be equal to or greater than the shortfall and relevant legal agreements with relevant parties will form the basis of a S106 agreement to secure the works.

For further guidance please refer to the GLA's guidance on preparing energy assessments at <http://www.london.gov.uk/priorities/planning/strategic-planning-applications/pre-planning-application-meeting-service/energy-assessments>.

### B. Water Efficiency

In accordance with DMD 56, the Sustainable Design and Construction Statement should include a section examining water efficiency within the development to meet relevant targets specified by the Policy. It should also provide details of the maximum level of water that can feasibly be provided to the development from rainwater and, where possible, grey water recycling, and include proposals for the integration of such systems into the development.

Relevant calculator tools utilised by the Code for Sustainable Homes and BREEAM can be used to qualify the statements and may form the basis of a condition attached to any planning consent.

### C. Design

Linked to **DRAFT DMD 1 'Achieving High Quality and Design-Led Development'**, **DRAFT DMD 3 'Sustainable Design and Construction Statements'**, **DRAFT DMD 50 'Energy Efficiency Standards'**, **DRAFT DMD 52 'Low and Zero Carbon Technology'**, **DRAFT DMD 54 'Use of Roof Space'**, **DRAFT DMD 55 'Heating and Cooling'**, **DRAFT DMD 58 'Avoiding and Reducing Flood Risk'**, **DRAFT DMD 60 'Sustainable Drainage Systems'** and **DRAFT DMD**

## Sustainable Design and Construction Statements

**61 'Flood Control and Mitigation Measures'** this section of the statement should demonstrate how sustainable design and construction best practice has influenced the form, bulk, mass and layout of the scheme to adapt to climate change and maximise efficiencies including:

- passive solar design;
- adequate daylighting;
- flood resilient design;
- reducing the need for heating and cooling;

Where appropriate and consistent with DRAFT DMD 12 'General Standards for New Residential Development' a daylighting study may also need to feature within the sustainable design and construction statement.

### D. Waste Management and Construction

Details of fully accessible waste and recycling storage will be required for all applications (excluding householder) in accordance with the London Borough of Enfield's: Waste a Recycling Planning Storage Guidance ENV 08/162 or replacement document. In addition developments will be required to demonstrate compliance with WAS1 of the Code for Sustainable Homes (in the case of residential development) and WST 03 of BREEAM or equivalent.

A Site Waste Management Plan will be required for all Major developments (and those defined under the Clean Neighbourhoods and Environment Act 2005) to accord with the requirements of Policy NLWP 6 of the North London Waste Plan and demonstrate procedures for the minimisation of construction waste consistent with the principles of the waste hierarchy: reduce; reuse; recycle; recover.

As a minimum SWMPs should include:

- A. Target benchmarks for resource efficiency set in accordance with best practice.
- B. Procedures and commitments to minimise non-hazardous construction waste at design stage. Specify waste minimisation actions relating to at least 3 waste groups and support them by appropriate monitoring of waste.
- C. Procedures for minimising hazardous waste.
- D. Monitoring, measuring and reporting of hazardous and non-hazardous site waste production according to the defined waste groups (according to the waste streams generated by the scope of the works)
- E. Diversion of waste from landfill should adhere strictly to the principles of the waste hierarchy of reduce; reuse; recycle; recover and evidence demonstrating each tier has been exhausted before a subsequent tier is employed according to the defined waste groups (in line with waste streams generated by the scope of the works). In addition a minimum of 85% of non-hazardous site construction waste by volume or weight must be diverted from landfill.

All other developments will be required to demonstrate through their statements how construction and demolition waste has been minimised so far as practicable.

The statement should include details of how construction site impacts have been minimised to prevent undue disruption to the surrounding areas, prevention of air and water pollution, and that all reasonable measures have been introduced to reduce energy and water consumption in accordance with the requirements of MAN2 of the Code for Sustainable Homes (for residential development) and MAN 03 of BREEAM (for non-residential development) or equivalent.

### E. Materials and Green Procurement

**DRAFT DMD 56 'Responsible Sourcing of Materials, Waste Minimisation and Green Procurement'** requires major development to submit a Green Procurement and Construction Plan. This should demonstrate how the procurement of materials for the development will promote sustainability, including by use of low impact, locally and/or sustainably sourced, reused and recycled materials. The Plan should also include strategies to secure local procurement and employment opportunities. Wherever possible, this should include targets and a process for the implementation of this plan through the development process.

## Sustainable Design and Construction Statements

In addition, all other forms of development will be required to submit a statement and relevant evidence to demonstrate that all materials used have been responsibly sourced and their embodied energy minimised. Relevant calculator tools under the Code for Sustainable Homes and BREEAM may be submitted with the scheme as well as excerpts from the 'Green Guide to Specification' at <http://www.bre.co.uk/greenguide/podpage.jsp?id=2126>. Where applicable the reuse of existing structures will be encouraged.

### F. Health and Wellbeing:

The statement should contain details outlining how the development has been designed for flexible use and adaptation to reflect changing lifestyles and needs of the end user including:

- Adequate daylighting (DRAFT DMD 12 'General Standards for New Residential Development');
- Access to amenity space (DRAFT DMD 13 'Amenity Space');
- Access to recreation and play facilities (DRAFT DMD 71 'Protection and enhancement of Open Space', DRAFT DMD 72 'Open Space Provision', DRAFT DMD 74 'Playing Pitches' & DRAFT DMD 73 'Children's Play Space');
- Provision of community services;
- Consistent with DRAFT DMD 1 'Achieving High Quality and Design-Led Development' demonstrating that the development is flexible enough to respond to social, technological and economic change;
- Provision of home office facilities;
- Evidence demonstrating compliance with the principles of Lifetime Homes a through each of the 16 criterion implementing best practice were feasible;
- Adherence to DRAFT DMD 19 'Specialist Housing Needs' demonstrating where necessary how the development has been design to accommodate specialist needs, including wheelchair accessibility;
- Submission of a Health Impact Assessment consistent with Policy 3.2 of the London Plan where appropriate;
- Provision for food growing space/allotments; and,
- Where appropriate, assessment under BREEAM Communities.

The statement should make explicit reference to Policies in the Local Plan, Enfield's Sustainability Programme, the Sustainable Communities Strategy and the objectives contained within Enfield's Food Strategy.

### G. Surface Water Run-off and Flood Risk:

In accordance with DRAFT DMD 58 'Avoiding and Reducing Flood Risk', DRAFT DMD 60 'Sustainable Drainage Systems', DRAFT DMD 61 'Flood Control and Mitigation Measures' & DRAFT DMD 62 'Protection of watercourses and flood defences' this section of the statement should evidence how surface water run-off has been attenuated from pre- to post construction, including details of Sustainable Urban Drainage Systems proposed, any rain water harvesting installations and flood risk assessments where appropriate.

Proposals in areas susceptible to flooding will be required to include flood resistant and/or resilient measures to mitigate potential flood risks in accordance with DRAFT DMD 58 'Avoiding and Reducing Flood Risk', DRAFT DMD 60 'Sustainable Drainage Systems', DRAFT DMD 61 'Flood Control and Mitigation Measures' & DRAFT DMD 62 'Protection of watercourses and flood defences'.

### H. Ecology:

In accordance with DRAFT DMD 78 'Nature Conservation' & DRAFT DMD 79 'Ecological Enhancements' the proposal will be required to outline how the development will contribute to the protection, enhancement or restoration of the ecological value of the site, including the provision of living roofs and landscaping/design features adapted to the identified priorities of the Biodiversity Action Plan for Enfield. Validation requirements for applications may require the submission of an Ecological Report and/or Tree Survey, these documents would form the basis of this section as appropriate.

### I. Travel:

# Sustainable Design and Construction Statements

Evidence should be provided to demonstrate how the development has sought to minimise traffic generation and the need to travel by car/private motor vehicle in accordance with DRAFT DMD 48 'Access and Servicing'. In accordance with Policy 6.13 of the London Plan the location, number and type of electric charging points (both active and passive) must be evidenced and qualified by this accompanying statement. Where appropriate Transport Assessments and Travel Plans should accompany the statement.

## J. Pre-assessments:

All new residential developments and all major non-residential developments must submit detailed pre-assessment under the Code for Sustainable Homes or the relevant BREEAM scheme undertaken by a BRE qualified and licensed assessor, these will form Appendices to the Sustainable Design and Construction Statement.

Other documents that may form part of the Sustainable Design and Construction Statement include, but are not limited to:

- Ecological Report;
- Tree Survey;
- Site Waste Management Plan;
- Health Impact Assessment;
- Transport Assessment;
- Flood Risk Assessment/Hydrology Report;
- Environmental Impact Assessment;
- Contaminated Land Study;
- Light Assessment Report;
- Noise Impact Assessment; and,
- Demolition Statement

The requirement for these documents will be triggered by the Local Validation List.

## Outline Applications

Outline planning applications need to fully address and commit to sustainable design and construction measure including energy efficiency. Depending on the matters to be considered, applicants should still undertake initial feasibility work on all the aspects set out above. The energy statement, in particular should address a site-wide energy strategy to form the framework of consideration for reserved matters applications. The structure should be the same as set out for full planning applications. Based on this information the Local Planning Authority will secure conditions to ensure that reserved matters applications contain an sustainable design and construction strategy that demonstrates consistency with the outline document submitted and energy strategy.

## Existing Buildings

The Council recognises the importance of improving the energy performance of the existing building stock and proposals involving refurbishment, fit out, conversion, or the change of use of an existing building that do not qualify for an assessment listed above will be encouraged to achieve high standards of energy and water efficiency, and should seek to exceed relevant Building Regulations wherever possible.

Planning applications for changes to existing domestic and non-domestic units will need to be accompanied by a completed 'sustainable design and construction statement' to identify if there are any reasonable improvements that could be made to the performance of the existing unit. Where measures are identified these will be enforced via condition in any approvals.

For domestic applications improvements will include, but will not be restricted to:

## A.

1. Loft insulation (where lofts exist and 300mm of insulation is not currently present);
2. Cavity wall insulation (where cavities exist and are not filled);
3. Solid wall insulation;

## Sustainable Design and Construction Statements

4. Improved heating controls (including TRVs, programmable timers, room thermostats);
5. Provision of A-rated boilers as a minimum (with a maximum NOx emission of 70mg/kWh);
6. Triple, double or secondary glazing (with low e-coating);
7. Energy efficient lighting (both internally and externally);
8. Draft-proofing; and,
9. Low flush toilets, flow restrictors, delayed inlet valves, low flow taps and rain water harvesting where appropriate

Opportunities for micro-generation of renewable energy through retrofitting will be supported, where appropriate in accordance with DRAFT DMD 52 'Low and Zero Carbon Technology'.

Proposals in areas susceptible to flooding will be required to include flood resistant and/or resilient measures to mitigate potential flood risks in accordance with DRAFT DMD 58 'Avoiding and Reducing Flood Risk', DRAFT DMD 60 'Sustainable Drainage Systems', DRAFT DMD 61 'Flood Control and Mitigation Measures' & DRAFT DMD 62 'Protection of watercourses and flood defences'.

Additional energy targets will be considered for major residential and non-residential applications involving refurbishment, fit out, conversion, or the change of use of an existing building and published following review of current Policy or as part of subsequent SPD.

# Sustainable Design and Construction Statements

## Design considerations

### Design considerations

#### Further Guidance Achieving High Quality and Design-Led Development.

The Council will continue to produce and review its suite of guidance documents and SPDs to which applicants are advised to refer. The Council also broadly endorses the following documents to which applicants should refer for guidance:

- CABE, 2000, *By Design: Urban Design in the Planning System: Towards Better Practice*;
- Llewelyn-Davies, 2007, *Urban Design Compendium 1: Second Edition*, English Partnerships and the Housing Corporation.
- Welsh Assembly Government, Department for Communities and Local Government, Department for Transport, 2007, *Manual for Streets*, Thomas Telford Publishing.
- The Chartered Institution of Highways and Transportation, 2010, *Manual for Streets 2: Wider Applications of the Principles*, Department for Transport.
- Design for London, 2010, London Housing Design Guide: Interim Edition, London Development Agency, The Chartered Institution of Highways and Transportation
- *Safer Places; The Planning System and Crime Prevention*, 2004, ODPM.
- Secured by Design publications and website at ([www.securedbydesign.com](http://www.securedbydesign.com)).

#### Assessing Safety

It is acknowledged that guidance is updated regularly, and therefore the Council will refer to current best practice and guidance as a material consideration when determining applications, especially where they have been endorsed by Government and/or relevant professional bodies. Further SPDs may also be developed to give clearer advice where this is considered necessary, or where local circumstances warrant it.

The requirement to create safe and secure places applies to all developments and will be assessed against the principles contained within the suite of Secured by Design documents. This will ensure that interventions present fewer opportunities for criminal activity and reduce the fear of crime in accordance with Core Policies 9 and 30. As part of this assessment, the Council will consult the Metropolitan Police on applications for major development. Applicants will be expected to work with both the Metropolitan Police and the Council in order to meet Secured by Design criteria, bearing in mind the need to achieve other objectives of urban design. How this has been achieved should be explicitly addressed within the design and access statement. In some cases, where crime and/or fear of crime are particularly important issues, achieving Secured by Design certification will be a condition of the grant of planning permission.

Occasionally the principles contained within the suite of Secured by Design documents may conflict with other urban design objectives, for example where security measures may be inappropriate for heritage reasons, or where a desire to reduce permeability would restrict connections with the surrounding communities. The weight attached by the Council to the competing objectives will be based on the context of the proposal and the merits of the scheme under consideration. Applicants must explain their reasons for any compromises that have been made within the Design and Access Statement.

#### Specific Design Requirements

In some cases, the Council's evidence base and/or professional assessment will highlight locations or situations in which more specific interventions and requirements are justified. Examples include areas benefiting from specific designations such as Conservation Areas (see Heritage policy), but there are other areas where specific features of buildings, streetscape or the public realm are important to the character, quality and identity of a place, and need to be preserved wherever this falls under the Council's control. As well as setting out general areas where homogeneity and quality are important (for example within homogenous Edwardian suburbs), the Characterisation Study (2011) identifies a number of more specific examples including:

- The Hyde Estate,
- The Beaconsfield Estate,

## Design considerations

- Chase Farm Hospital,
- Broad Walk, Winchmore Hill,
- Queensway, Ponders End,
- Middlesex Uni, Trent Park.

The Characterisation Study sets out the main characteristics of these areas that contribute to their quality. Frequently, the conclusion is that there is a need to guard against small changes which by their cumulative nature, are having a significant and detrimental impact on the quality of the urban environment. Equally, inappropriate detailing and materials included as part of new buildings/structures can also have significant implications for the overall quality of the area.

These changes can include, but are not limited to: extensions (for example hip to gable roof alterations); changes to hard and soft landscaping (in particular to boundary treatments and conversion of front gardens to parking areas); alterations to architectural detailing and materials; insensitive replacement of fenestration; changes to front elevations (including cladding and painting of masonry); or the addition of plant, ducting and heating, cooling, ventilation and extraction systems; the installation of lifts, ramps and fire escapes.

The intention is not to imply that positive elements of the existing built form should always be reproduced in new development. Indeed, this may, in the specific circumstances, be undesirable. However, the details and materials of new development should always compliment the character of the area and help to reinforce the positive elements that make an area distinctive.

The Council will use its powers to prevent further deterioration of the environment as a result of the above mentioned changes, requiring reinstatement and preventing further loss of built elements as part of any planning application, and requiring their inclusion as part of new interventions where this is appropriate. Architectural detailing and the choice of materials set out within planning applications will be scrutinised in detail to ensure they are appropriate. This will include an assessment of whether measures are necessary in order to prevent deterioration over time, (for example by requiring details of the maintenance regime), which may be made a condition of any planning approval.

### *Poor Quality Environments*

Stringent attention will be given to design and detailing across the borough, including areas presently of poor urban environmental quality. In such areas, there will be a strong requirement to improve the quality of the urban environment and set a high standard for future development. Again, the Characterisation Study draws attention to some of the areas where this is the case, such as: Crewes Hill; Edmonton; in the vicinity of New Southgate and Arnos Grove stations; Enfield Island Village; in many social housing estates; and along strategic roads such as the North Circular (A406) and Great Cambridge (A10) roads.

### *Prominent Development*

One further area to which the Characterisation Study draws attention is the need for higher design standards in areas that, by virtue of their context, have a disproportionately high impact on the way that the borough is perceived by residents, visitors and passers through. For example, at gateways to the borough (e.g. train stations or where roads cross the borough boundary), at gateways to significant districts (such as commercial/employment areas) or along major transport corridors along which a high number of people travel and are therefore influenced by the environment. In such locations a particularly high standard of design quality will be required.

The Characterisation Study is not exhaustive in its assessment of areas where higher standards of design quality are needed, or where specific design elements need to be referenced. As a borough-wide document, it does not cover in great detail the attributes that need to be protected, or the issues that need to be addressed within each area, nor does it give detailed guidance on how this may be achieved. Therefore, the Council may develop additional SPDs to provide this detail.

### *Public Realm and Street Scene*

## Design considerations

Improvements to the public realm and street scene, as the Characterisation Study suggests, can help to highlight the positive characteristics of an area or change the perception of it for the better. This is because people experience the urban environment from the public realm and the public-facing elements of private developments. General guidance on the design of the public realm and how development responds to it is given in the reference documents listed above. This guidance will be applied to Council-led schemes, as well as where developers are creating new elements of public realm through development.

In addition, the character and detailed design of the public realm is often instrumental in creating identity and a sense of place, and therefore a specific and consistent design approach within a defined area may be desirable in some circumstances. The implications of this may extend to the way developments are required to respond to the public realm, to the design of publicly accessible, though privately owned and managed, spaces within developments or to the financial contributions that developments are required to make. Likewise, the function, intensity of use or geographic location of an area of public realm may make its design especially important (e.g. stations, town/local centres).

The Characterisation Study highlights a number of issues that are of particular relevance to Enfield:

- The dominance of traffic, highways infrastructure and street clutter creating an oppressive environment for pedestrians and severing communities, (for example along strategic routes and in town/local centres), which can be exacerbated by vehicle routing, such as in Enfield Town
- Parking on front gardens and loss/inappropriate replacement of boundary treatments
- The appearance and insensitive location of surface car parks and the need to locate, landscape and design them more sensitively, (e.g. in rural areas where they are more noticeable, in town/local/commercial centres and in Enfield Island Village)
- Loss of street greenery and lack of appropriate maintenance of street trees and hedges
- The need to improve the visibility, accessibility and appearance of green areas such as grasslands, marshes and the LVRP
- The lack of function and/or accessibility of open space (e.g. in garden suburb-type development and free-form housing estates)
- The proliferation of advertisements and the need to manage their number, design and location, for example in town and local centres where they mask interesting architectural and historic features of buildings
- The need for particular attention to be paid to the quality of the public realm in commercial, shopping and industrial centres, which is often poor quality (e.g. at the Great Cambridge Road retail park and at Edmonton Green)
- The need for continuity and activity in the built frontage and for built development to address the public realm (e.g. in large new commercial developments, housing estates or through failure to provide a mix of uses to ensure activity throughout the day).

SPDs will be developed where it is considered that guidance in the above listed reference documents is insufficient to guide design.

### *Balancing Competing Objectives*

Improving the design of an intervention can usually be achieved through cost-neutral changes, rather than placing onerous demands on the developer. In these cases, applicants will be expected to demonstrate fully that the proposed solution is the most appropriate. Where compromises are made for technical or financial reasons, these must be fully explained and justified. If the result has an unduly negative impact on any of the design objectives set in policy DRAFT DMD 1 'Achieving High Quality and Design-Led Development', permission will not be granted and the principle of development on the site must be revisited.

# Design considerations

# Commercial Opening Hours

## Commercial Opening Hours

The commercial uses covered by this appendix are for A3 (restaurants and cafes) A4 (drinking establishments), A5 (hot food takeaway), banqueting suites (DMD Policy 38) and social clubs (DMD Policy 39).

The permitted opening hours of premises as set out in this appendix should be considered along with national licensing regulations and Enfield Council Licensing Policies.

This appendix sets out the opening hours according to the hierarchy of town centres.

The potential disturbance caused by an A3/A4/A5, banqueting suite or social club use, particularly in the evenings, arises in the main from:

- a. Patrons arriving and departing - since many patrons make the journey to and from an A3/A4/A5, banqueting suite or social club use by car, the availability and location of on and off-street parking will be a critical factor in assessing the possible disturbance the use will cause. This includes the noise and disturbance from people arriving and leaving, such as shouting, car horns, loud car stereos etc. Where on street parking in the vicinity is limited, patrons' parking will tend to spill over into nearby residential streets.
- b. Noise generated by the premises - this may arise where the dining is accompanied by music or other entertainment. The kitchen activities may also cause noise nuisance to neighbouring residents, as will the cleaning and tidying up of the premises after closing time. These problems will be exacerbated in the summer when windows in the A3/A4/A5, banqueting suite or social club premises and the dwellings may be open late into the night.

### Opening and Closing Times

In order to address such matters, the Council can impose a restriction on the days and times when the A3/A4/A5, banqueting suite or social club premises may be open for business. In this regard, the Council employs the following terms:

- "opening time" - the time at which customers may be admitted to the premises.
- "closing time" - the time at which all customers must vacate the premises.

It should be noted that the term "closing time" does not mean the time at which the doors are closed to any further customers, or the time at which last orders may be taken.

The Council recognises that operators of A3/A4/A5, banqueting suite or social club establishments will normally wish to tidy up both the dining area and kitchens after the customers have left. In attaching an "hours of use" condition to a planning application, therefore, the Council may also specify the period immediately following the closing time during which the operator may carry out any cleaning, tidying, laying the tables for the following day and other such activity related to the use.

### Noise and Disturbance

Most A3/A4/A5, banqueting suite or social club uses are located in shopping centres which range in size from large town centres to small local parades and corner shops. In general, the smaller the shopping centre, the more likely it is that surrounding residential areas will be adversely affected by the noise and disturbance generated by an A3/A4/A5, banqueting suite or social club use. On this basis the Council specifies in Tables 17.1 to 17.3 the opening and closing times for A3/A4/A5, banqueting suite or social club uses located in particular types of shopping centre. The Enfield's hierarchy of town centres is shown on table 6.3 of the Core Strategy.

It is the Council's intention to apply the opening and closing times specified in Tables 17.1 to 17.3 as a starting point against which the detailed circumstances of the premises and their surroundings may be assessed. The Council recognises that the individual circumstances affecting the location of an A3/A4/A5, banqueting suite or social club use will vary a great deal. In some circumstances it may be appropriate to make the opening or closing time more restrictive than that specified in Tables 17.1 to 17.3. There may also be circumstances where an earlier opening time or later closing time than that specified would be acceptable.

# Commercial Opening Hours

The factors which the Council takes into account in assessing these matters include:

- a. The proximity of residential properties;
- b. The character of nearby residential properties, for example whether they consist of upper floor flats over shops, houses in an area of mixed use immediately adjoining the shopping centre, or houses forming an integral part of a suburban housing estate;
- c. The relationship of nearby residential properties to the A3/A4/A5, banqueting suite or social club use, for example whether the dwellings are situated on the opposite side of the street, further along the street, or to the rear;
- d. The traffic flows and other characteristics of the public highway fronting the A3/A4/A5, banqueting suite or social club premises;
- e. The availability of parking space in the neighbourhood, whether on or off-street.

## Traffic-Related Issues

In the case of opening times, the choice of time will be particularly influenced by the level of traffic and by the availability of parking in the vicinity of the A3/A4/A5 banqueting suite or social club premises. Where the on-street parking generated by the premises is, in the Council's opinion, likely to give rise to hazardous conditions or cause congestion, the opening time will be set so as to avoid the premises being open during periods of peak traffic flow. This will be particularly relevant in the case of hot food takeaways or where a takeaway service is to be provided ancillary to the main use.

## Opening Hours

The following table is for determining planning applications for the establishment or change of use of premises to use class A3/A4/A5; the days of the week and hours of the day during which those premises located within specific categories of shopping centre maybe open for business.

Table .1

Shopping Centres	Days/Hours During Which the Premises may be Open for Business		
Category	Days	Opening Time	Closing Time
Major Town Centre and District Centres	Mon – Sat	08:00	02:00
	Sun	09:00	24:00
Large Local Centres	Mon – Sat	08:00	24:00
	Sun	09:00	23:30
Small Local Centres	Mon – Sat	08:00	23:30
	Sun	09:00	22:00
Local Parades	Mon – Sat only	08:00	23:00
	Sun	09:00	22:00
Outside Town Centres	Mon – Sat	08:00	23:00
	Sun	09:00	22:00

The following table is for determining planning applications for the establishment or change of use of premises to banqueting suites; the days of the week and hours of the day during which those premises located within specific categories of shopping centre maybe open for business.

## Commercial Opening Hours

Table .2

Shopping Centres	Days/Hours During Which the Banqueting Suite Premises may be Open for Business		
Category	Days	Opening Time	Closing Time
Major Town Centre and District Centres	Mon – Sat	08:00	02:00
	Sun	09:00	24:00
Large Local Centres	Mon – Sat	08:00	24:00
	Sun	09:00	23:30
Small Local Centres	Mon – Sat	08:00	23:30
	Sun	09:00	22:00
Local Parades	Mon – Sat only	08:00	23:00
	Sun	09:00	22:00
Retail Parks	Mon – Sat	08:00	02:00
	Sun	09:00	24:00

The following table is for determining planning applications for the establishment or change of use of premises to social clubs; the days of the week and hours of the day during which those premises located within specific categories of shopping centre maybe open for business.

Table .3

Shopping Centres	Days/Hours During Which the Social Club Premises may be Open for Business		
Category	Days	Opening Time	Closing Time
Major Town Centre and District Centres	Mon – Sat	10:00	01:00
	Sun	11:00	23:00
Large Local Centres	Mon – Sat	10:00	24:00
	Sun	11:00	23:00
Small Local Centres	Mon – Sat	10:00	23:30
	Sun	11:00	22:00
Local Parades	Mon – Sat only	10:00	23:00
	Sun	11:00	22:00
Outside Town Centres	Not permitted	Not permitted	Not Permitted

### Notes:

1. In Table 17.1/17.2/17.3 the "opening time" is defined as the time at which customers may be admitted to the premises, whilst the "closing time" is the time at which all customers must vacate the premises. It should be

## Commercial Opening Hours

noted that the term "closing time" does not mean the time at which the door is closed to any further customers, or the time at which last orders may be taken.

2. In the case of Large Local Centres, Small Local Centres and Local Parades, all activities related to the Class A3/A4/A5, banqueting suite or social club use, for example cleaning, tidying and laying tables for the following day, must cease within one hour of the specified closing time.
3. For a list of the shopping centres which fall within the above categories, see Table 6.3 of the Core Strategy.
4. Table 17.1/17.2/17.3 is only intended to serve as a general guide to the days of the week and hours of the day during which Class A3/A4/A5, banqueting suite or social club premises situated within specified categories of shopping centre may be open for business. The permitted hours of use will be further refined in the light of the individual circumstances of the premises and their surroundings, as indicated in the accompanying guidelines.
5. Enfield's Cumulative Impact Policy (CIP) on licensing came into force in 2012 for the restriction of licensing hours for certain activities in Enfield Town, Southgate, and some parts of the Hertford Road corridor.

# Conservation Statements

## Conservation Statements

### Requirements of the Conservation Statement

The Conservation Statement may be included within the Design and Access Statement, where one is required. It must cover the following topics:

1. An assessment of the significance of the asset derived through consultation of the appropriate Historic Environment Record, other records/listings (e.g. statutory and local lists, the Heritage Gateway, the National Monuments Record and local documents such as character appraisals) and on-site assessment of the asset and its setting.

Applicants should seek advice about whether a Written Scheme of Investigation will need to be produced in order to ensure that appropriate investigations are carried out before, during and after works, and that the information gathered is recorded and disseminated appropriately. This is especially important for schemes that result in the alteration, loss or partial loss of an asset.

If deemed necessary, the Written Scheme of Investigation will be proportionate, satisfactory and appropriate and will need to be secured prior to determination of an application. The receipt of satisfactory information as a result of the scheme's implementation is likely to be a condition of beneficial occupation of the development or the matter of a s106 agreement.

Expert assessment may be necessary depending on the significance of both the asset and the proposed works. Advice should be sought from heritage officers and/or English Heritage regarding the extent of this work;

2. A desk-based assessment of the archaeological interest of a site, where the site is known to include, or is likely to include such interest (e.g. in areas of archaeological interest). Where desk-based research is insufficient to properly assess the interest, a field evaluation (e.g. geophysical survey, physical survey and/or trial trenching) may also be necessary;
3. A reasoned explanation of how the proposal addresses issues raised in character appraisals, management plans or other relevant evidence-base documents relating to the heritage asset. Development which exacerbates identified issues will be refused and the Council will use its powers to reverse damaging trends where possible. Applicants should visit the Council's website or contact the Heritage Team for the most up to date documents relating to the borough's heritage assets. However, it is useful to note a number of issues that have been consistently highlighted in the evidence base as being of detriment to heritage assets. These include:
  - a. Parking on front gardens;
  - b. Loss of architectural detail;
  - c. Changes to fenestration in conservation areas;
  - d. Introduction of inappropriate advertisements. (Areas and buildings of historic interest are particularly vulnerable to the size, siting, design, colour scheme and illumination of advertisements. Internally illuminated and/or projecting box-type fascia signs are particularly damaging).
4. A reasoned explanation of how the proposal preserves and enhances the heritage asset;
5. Where the proposal will lead to substantial harm to or total loss of significance of the heritage asset, evidence that other potential owners or users of the site have been sought through appropriate marketing and that reasonable endeavours have been made to seek grant funding for the heritage asset's conservation and to find charitable or public authorities willing to take on the heritage asset.
6. Detail regarding the sources that have been considered and the expertise used in assessing the impact of the proposal.

Applications which fail to adequately address the above will not be acceptable.

# Conservation Statements

# London Plan Car Parking and Cycle Standards

## London Plan Car Parking and Cycle Standards

Table .1 Parking for retail

<b>Maximum standards for retail uses: space per sq m of gross floorspace</b>			
<b>Use</b>	<b>PTAL 6 and 5</b>	<b>PTAL 4 to 2</b>	<b>PTAL 1</b>
Food			
Up to 500 m2	75	50-35	30
Up to 2500 m2	45-30	30-20	18
Over 2500 m2	38-25	25-18	15
Non food	60-40	50-30	30
Garden Centre	65-45	45-30	25
Town Centre/Shopping Mall/Dept Store	75-50	50-35	30

Table .2 Parking for employment uses

<b>Non-operational maximum standards for employment B1: spaces per sq m of gross floorspace</b>	
<b>Location</b>	
Central London (CAZ)	1000-1500
Inner London	600-1000
Outer London	100-600
Outer London locations identified through DPD where more generous standards should apply (see Policy 6.13)	50-100

Table .3 Parking for residential development

<b>Maximum residential parking standards</b>			
<b>Number of beds</b>	<b>4 or more</b>	<b>3</b>	<b>1-2</b>
	2 -1.5 per unit	1.5 -1 per unit	Less than 1 per unit

Table .4 London Plan Cycle Parking Standards (Minor Alterations November 2011)

<b>Use Class</b>	<b>1 space per sq.m. of gross floorspace (unless otherwise stated)</b>
A1 - Food	Out of Centre 1/350

# London Plan Car Parking and Cycle Standards

Use Class	1 space per sq.m. of gross floorspace (unless otherwise stated)
	In centre 1/125
A1 - Non Food	Out of Centre 1/500 In Centre 1/300
A2 (Financial Services)	1/125
A3 - A5 Cafés & Restaurants Pubs & Wine Bars Take-aways	1 per 20 staff + 1 per 20 customers 1/100 1/50
B1 (Business)	1/250
B2 - B8 (General Industry and Storage & Distribution)	1/500
C1 (Hotels)	1 per 10 staff
C2 (Residential Institutions) Care Homes Hospitals	1 per 3 staff 1 per 5 staff + 1 per 10 visitors
C3 (Dwellings)	1 per 1 or 2 bed unit 2 per 3 or more bed unit
D1 (Non- residential institutions) Primary, Secondary School University/Colleges Libraries Health facilities/clinics	1 per 10 staff or students 1 per 8 staff or students 1 per 10 staff + 1 per 10 visitors 1 per 50 staff + 1 per 10 visitors
D2 (Assembly & Leisure) Cinemas Leisure facilities	1 per 20 staff + 1 per 50 seats 1 per 110 staff + 1 per 20 peak period visitors

# Parking Design and Access Arrangements.

## Parking Design and Access Arrangements.

### Car Parking Dimensions

The adopted bay size for car space is 4.8 x 2.4m. Where a car space is provided at a right angle to the road or aisle in a car park, the aisle should be a minimum of 6.0m wide. However a 3.0m wide bay would allow an aisle or forecourt to be reduced to 5.5m.

Where parking layouts provide a chevron parking design, the aisle width could be reduced, but the bay depth will need to be adjusted depending on the angle of the parking.

Parking bays parallel to the kerb should be 6.0m long x 2.4m wide (if there is no footway verge) otherwise 2.0m would be acceptable. This is in line with Manual for Street 2.

Disabled parking bays would need to be larger. Exact dimensions will be dependent on location and orientation to the kerb. Further guidance is provided in the Department for Transport on inclusive mobility at: <http://www.dft.gov.uk/publications/inclusive-mobility/>

### Garage Dimensions

The minimum garage size for cars is 7.0m x 3.0m (internal dimension). Garages of this dimension, or above will be considered a parking space.

### Access Needs for New Development ( Crossovers and New Junctions)

All new development must be designed to be fully accessible for all mobility requirements and should maximise walkability through the provision of attractive and safe layouts with pedestrian permeability. Major development proposals should include off-carriageway links for cyclists.

New vehicle accesses generally give rise to two main highway considerations:

1. Highway safety, (vehicular and pedestrian); and
2. Impact on the free flow of traffic.

The considerations highlighted below will vary depending on the category of highway involved, the greater issues being where access is proposed on to Principal or Classified roads. The lower down the highways hierarchy, generally issues around safety and traffic flow are less of a concern. The Council is seeking to develop a more formulaic approach related to the access issues and the Borough's road hierarchy, further policy guidance is being developed.

Where a development requires a new junction onto an adopted highway, the considerations below will still apply. However, in addition the Transport Statement of Transport Assessment will need to address the issues comprehensively and where appropriate undertake a capacity assessment and safety audit.

### Vehicle Access Considerations

- Overall impact on highway safety and free flow traffic.
- Volume & nature of traffic servicing the development
- Speed limit (or percentile speeds on higher speed roads).
- Road width.
- Levels/gradients.
- Bus routes/services/stops.
- Impact of right turning vehicles into a site.
- Sight lines/visibility splays
- Proximity of junctions or bends.
- Collision records.
- Availability of alternative access options.

# Parking Design and Access Arrangements.

# Minimum Requirements for a Site Specific FRA

## Minimum Requirements for a Site Specific FRA

### Minimum requirements for a site specific Flood Risk Assessment (FRA) (source: PPS25)

At all stages of the planning process, the minimum requirements for flood risk assessments are that they should:

- be proportionate to the risk and appropriate to the scale, nature and location of the development;
- consider the risk of flooding arising from the development in addition to the risk of flooding to the development;
- take the impacts of climate change into account;
- be undertaken by competent people, as early as possible in the particular planning process, to avoid misplaced effort and raising landowner expectations where land is unsuitable for development;
- consider both the potential adverse and beneficial effects of flood risk management infrastructure including raised defences, flow channels, flood storage areas and other artificial features together with the consequences of their failure;
- consider the vulnerability of those that could occupy and use the development, taking account of the Sequential and Exception Tests and the vulnerability classification, including arrangements for safe access;
- consider and quantify the different types of flooding (whether from natural and human sources and including joint and cumulative effects) and identify flood risk reduction measures, so that assessments are fit for the purpose of the decisions being made;
- consider the effects of a range of flooding events including extreme events on people, property, the natural and historic environment and river and coastal processes;
- include the assessment of the remaining (known as 'residual') risk after risk reduction measures have been taken into account and demonstrate that this is acceptable for the particular development or land use;
- consider how the ability of water to soak into the ground may change with development, along with how the proposed layout of development may affect drainage systems; and
- be supported by appropriate data and information, including historical information on previous events.

# Minimum Requirements for a Site Specific FRA

## Air Quality

### Air Quality Action Plan (Appendix 2: Roads Predicted to Exceed the Air Quality Standards)

Table 4. Roads identified as areas of poor air quality (from Stage 3 Results)

NB The whole borough was declared an Air Quality Management Area

Table .1

Road Name	Road No.	Column A PM10	Column B NO2	Public Exposure
Great Cambridge Road	A10 ( TLRN )	23.2	11.2	Y
Green Lanes	A105	4.2		Y
Southbury Road	A110	9.2	6.2	Y
Telford Road NorthCircular Road	A406 ( TLRN )	8.2	7.2	Y
Lea Valley Road	A110	9.2	3.2	Y
Cecil RoadA110	A110	4.2		Y
GreatCambridge Road	A10 ( TLRN )	33.2	31.2	Y
Green Lanes	A105	9.2	3.2	Y
Church Street	A110	2.2		Y
The Ridgeway	A110	2.2		Y
Windmill Hill	A110	2.2		Y
North Circular Road	A406 ( TLRN )	13.2	9.2	Y
LeaValley Road	A110	3.2	1.2	Y
Nags Head Road	A110	3.2	1.2	Y
Church Street	A110	1.2		Y

## Air Quality

Road Name	Road No.	Column A PM10	Column B NO2	Public Exposure
Great Cambridge Road	A10 ( TLRN )	13.2	8.2	Y
Angel Road (North Circular Road)	A406 ( TLRN )	13.2	8.2	Y
Walthamstow Avenue (North Circular Road)	A406 ( TLRN )	8.2		Y
Fore Street	A1010	4.2		Y
High Road	A1010	4.2		Y
London Road	A110	6.2	4.2	Y
Angel Road (North Circular Road)	A406(TLRN)	59.2	25.2	Y
Sterling Way (North Circular Road)	A406(TLRN)	23.2	14.2	Y
Fore Street	A1010	4.2		Y
Hertford Road	A1010	4.2	0.2	Y
Hertford Road High Street	A1010	4.2	0.2	Y
The Broadway	A1010	4.2	0.2	Y
The Green	A1010	4.2	0.2	Y
Great	A10 ( TLRN )	8.2	9.2	Y

## Air Quality

Road Name	Road No.	Column A PM10	Column B NO2	Public Exposure
Cambridge Road				
Green Lanes	A105	6.2	0.2	Y
Southbury Road	A110	2.2		Y
The Town	A110	2.2		Y
Bowes Road (North Circular Road)	A406 ( TLRN )	13.2	11.2	Y
Friern Barnet Road	A1003	4.2		Y
Church Street	A110	4.2		Y
The Town	A110 4.2 Y	4.2		Y
Bullsmoor Lane	A1055	15	17	Y
Meridian Way	A1055	10	8	Y
Mollison Avenue	A1055	5	7	Y

NOTE: - TLRN: Transport for London Road Network

Column A - represents the distance in metres from the kerb at which NAQS objective is met for PM10 (particles) concentrations

Column B - represents the distance in metres from the kerb at which NAQS objective is met for NO2 concentrations

The exceedences at these locations arise from traffic emissions and from industrial process emissions. However, it is quite clear that any plan of action within the process of local air quality management must take account of the fact that emissions from road vehicles account for more than 75% of the total emissions from all sources in relation to the two pollutants of concern.

## Air Quality

The review and assessment has highlighted the main 'through' roads, into and out of the borough as being the main contributors to the poor air quality in Enfield. These 'through' roads include the A10, Hertford Road, The Ridgeway, Cattlegate Road, Stagg Hill and Waggon Road. . All these roads intersect with the M25, with the exception of Waggon Road, which is used excessively as a 'cut through' from/to the neighbouring borough of Barnet.

Distances of exceedence can be seen to vary on the same road, this is because of the varying traffic flows along one stretch of road, certain sections of a road, such as the A406, will carry more traffic at some points than others. When this information is inputted into the dispersion model it produces the variable results seen in the above table.

# Hazardous Installations

## Hazardous Installations

### List of major hazard sites and pipelines

#### Major Hazard Sites

Table .1

Site Operator	Site Address	Postcode	Site Type	HSE Reference Numbers
Calor Gas Limited	29 Stacey Avenue Edmonton London	N18 3PE	Hazardous Substances Consent	H0840/H0840
Shell Gas Limited	Picketts Lock Lane Edmonton London	N9 0AS	Hazardous Substances Consent	H0101/H0101
Thames Water Utilities	Deephams Water Treatment Works Picketts Lock Lane Edmonton London	N9 0BA	Hazardous Substances Consent	H3244/H3244
Transco PLC	Holder No 4 Leeside Road Tottenham London	N17 0SG	Hazardous Substances Consent	H3570/H3570
Transco PLC	Tottenham Holder Station (Holdesr No's 2 & 3)Willoughby Lane Tottenham London	N18 2DW	Hazardous Substances Consent	H1459/H1459
UOP Limited	Jeffrey's Road Brimsdown	EN3 7PN	Hazardous Substances Consent	H3839/H3839

#### Major Hazard Pipelines

## Hazardous Installations

Table .2

HSE Reference Number	TRANSCO index Number	Pipeline Operator	Pipeline Name	Location Map reference (Start)	Location Map reference (Finish)	Inner Zone (Metres)	Middle Zone (Metres)	Outer Zone (Metres)
11892		Enfield Energy Centre Ltd	NTS (Epping Green) to Enfield EC pipeline			55	210	270
8013	2271	Transco PLC	White Hill to Stag Hill (NOP)	TQ077923	TQ270995	3	3	150
8028	2286	Transco PLC	Stagg Hill to Barnet	TQ271995	TQ265966	8	8	55
8160	2419	Transco PLC	Inlet/Station 5 (Sewardstone)	TQ383978	TQ383978	17	17	24
8184	2443	Transco PLC	Romford to Stag Hill (North Orbital Pipeline) (3/4)	TQ507881	TQ270995	3	10	170

The table above is based on information provided by the Health and Safety Executive. However, it should be noted that this is subject to change and therefore developers should liaise with the HSE and review the most up to date maps/tables of major hazard sites and pipelines.

## Green Infrastructure

## Green Infrastructure

### Green Infrastructure Checklist

Source: developed from Natural England Guidance on Green Infrastructure

This checklist is provided to support DMD Green Infrastructure Policy. Applicants will need to demonstrate that the application seeks to remedy the criteria listed. Applicants must submit details presenting how the checklist will be met. If applicants are not able to meet any of the criteria, the applicant will need to provide a rationale for non conformity.

#### Notes:

Developments of less than 0.5 hectares do not have to provide Green Infrastructure but this will be assessed on a case by case basis whether the development would create a need for green infrastructure improvements.

Developments of more than 0.5 hectares are expected to adhere to the entire checklist in making an application.

This checklist should be read in conjunction with the related policies and satisfied as part of the application.

### Green Infrastructure Checklist

Table .1

Quanta of development (based on External Site Area)	Green Infrastructure Themes	Checklist
Less than 0.5ha	No requirement	Not applicable
0.5 ha or more	Landscape character, setting and management	Does the character appraisal take full account of Strengths, Weaknesses, Opportunities and Constraints?
		Has a landscape management plan been prepared? ( <b>see related policy on maintaining and improving the quality of the built and open environment, Core Policy 30 and DMD DRAFT DMD 81 'Landscaping'</b> ).
		Does the scheme conserve existing structural landscape features i.e. trees, woodlands and hedgerows? ( <b>see related policy on landscaping Core Policies 30,31 and DRAFT DMD 78 'Nature Conservation' and DRAFT DMD 79 'Ecological Enhancements'</b> ).
		Where proposals create settlement edges or create new edges, do they deliver peri urban landscape enhancement? ( <b>see related policy on Built and landscape heritage, Core Policy 31 and DRAFT DMD 79 'Ecological Enhancements' and 'Enfield's Detailed Green Belt Boundary Review - seeking your views'</b> ).
		Does the scheme conserve important geological or topographical features and key views or visual relationships? ( <b>see related policy on Character, Core Policies 30,31 and DRAFT DMD 73 'Children's Play Space'</b> ).

# Green Infrastructure

		Is provision made for the restoration of historic or lost landscape features? ( <b>see related policy on Character, Core Policies 30,31.</b>
Biodiversity and access to nature		Does the scheme abut or incorporate a designated nature conservation site? If so does the scheme deliver positive management to conserve and enhance the condition and diversity of this? ( <b>see related policy on Biodiversity Core Policies 34,36 and DRAFT DMD 76 'Wildlife Corridors'.</b>
		Does the proposal take full account of other non designated sites or BAP habitats or species? ( <b>see related policy on Biodiversity Core Policy 36 and DRAFT DMD 76 'Wildlife Corridors' and DRAFT DMD 77 'Green Chains'.</b>
		Does the green infrastructure proposed allow for more 'naturalistic' landscape management, to enhance biodiversity and character? ( <b>see related policy on Biodiversity Core Policies 31,36 and DRAFT DMD 76 'Wildlife Corridors', DRAFT DMD 78 'Nature Conservation' and DRAFT DMD 79 'Ecological Enhancements'.</b>
		Does the landscaping scheme contain a majority of native and wildlife friendly species? ( <b>see related policy on Biodiversity Core Policies 31,36 and DRAFT DMD 76 'Wildlife Corridors' and DRAFT DMD 78 'Nature Conservation'.</b>
		Does the project create new wildlife corridors to link existing sites and therefore assist in reversing habitat fragmentation? ( <b>see related policy on Biodiversity Core Policies 31,36 and DRAFT DMD 76 'Wildlife Corridors'.</b>
		Has a nature conservation management plan been produced, for the scheme? ( <b>see related policy on Biodiversity Core Policies 31,36 and DRAFT DMD 78 'Nature Conservation'.</b>
Water management		Does any part of the scheme incorporate SuDs, either in the form of permeable paving or swales, green roofs/walls, etc? ( <b>see related policy on SuDs in Core Policy 21,28,29 and DRAFT DMD 60 'Sustainable Drainage Systems'.</b>
		Has provision been made for water balancing measures such as stormwater ponds or lagoons, to recharge groundwater? ( <b>see related policy on SuDs and flood risk in Core Policies 21, 28,29 and DRAFT DMD 61 'Flood Control and Mitigation Measures'.</b>
Climate change adaptation		Does the Green Infrastructure facilitate the movement of species in response to climate change, through creation of habitat corridors, "stepping stones" and linkages? ( <b>see related policy on Green Corridors/Chains, Core Policy 34,35,36 and DMD DRAFT DMD 76 'Wildlife Corridors' and DRAFT DMD 77 'Green Chains'.</b>
		Does the scheme provide for SuDs to recycle greywater and harvest rainwater, or where appropriate to reduce flash flooding in nearby rivers? ( <b>see related policy on SuDs in Core Policy 21,28,29 and DRAFT DMD 60 'Sustainable Drainage Systems'.</b>

## Green Infrastructure

		<p>Does the scheme use street trees to provide 'urban greening', positioned to reduce surface water runoff? <b>(see related policy on managing flood risk through development, Core Policy 28 and DRAFT DMD 58 'Avoiding and Reducing Flood Risk'.</b></p>
		<p>Does the tree planting within the scheme have the potential to fulfil a shading and cooling function by providing large canopy trees and does tree planting follow the principle of 'right place, right tree' as set out in the London Plan (through the London Tree and Woodland Framework. GLA 2005)? <b>(see related policy on trees in DMD DRAFT DMD 80 'Trees on Development Sites'.</b></p>
		<p>Do buildings or structures within the scheme incorporate green roofs or walls? <b>(see related policy on Tackling Climate Change)</b></p>
	Healthy and cohesive communities	<p>Does the scheme provide passive recreation for all ages which can enhance social interaction e.g. meeting places, quiet areas and areas for natural play? <b>(see related policy on Health and community cohesion, Core Policies 7,9,11,25,34,35 and DMD DRAFT DMD 71 'Protection and enhancement of Open Space'.</b></p>
		<p>Does the scheme provide for active recreation e.g. green gyms, health walks, cycling routes? <b>(see related policy on Parks, playing fields and other open spaces, Core Policies 7,9,11,25,34,35 and DMD DRAFT DMD 74 'Playing Pitches' and DRAFT DMD 77 'Green Chains'.</b></p>
		<p>Is provision made for local food production, either in the form of allotments or community orchards and gardens? <b>(see related policy on Parks, playing fields and other open spaces, Core Policies 7,9,11,25,34,35 and DRAFT DMD 72 'Open Space Provision'.</b></p>
	Green travel	<p>Does the scheme connect to or incorporate an existing or planned low carbon transport scheme? Or a recreation network, such as walking and cycling routes? <b>(see related policy on sustainable transport, Core Policies 24,25,26,27 and DRAFT DMD 77 'Green Chains'.</b></p>
	Green specifications	<p>Does the proposal make use of locally sourced or grown plant material? I.e. Local provenance of the sourcing of plant materials. <b>(see related policy on Delivering sustainable waste management Core Policy 22 and DRAFT DMD 56 'Responsible Sourcing of Materials, Waste Minimisation and Green Procurement'.</b></p>
		<p>Have reclaimed materials been used for structures or hard landscape works? <b>(see related policy on Delivering sustainable waste management Core Policy 22 and DRAFT DMD 56 'Responsible Sourcing of Materials, Waste Minimisation and Green Procurement'.</b></p>
	Standards and facilities	<p>Have standards been adopted for the quality and accessibility of facilities such as green spaces and the services visitors can expect from different spaces? <b>(see related policy on Parks, playing fields and other open spaces, Core Policy 34 and DMD Appendix 4 Green Infrastructure)</b></p>

# Green Infrastructure

	Ensuring Green Infrastructure legacy	Are there proposals for adoption, long term management and governance (with identified parties and funding sources)? (see related policy on infrastructure delivery, Core Policies 1,46 and London Plan Policy 2.18)
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## Enfield's Open Space Standards

Table .2

Open Space Type	Quantity Standard	Area required to meet needs up to 2026	Accessibility Standard	Quality Standard
Public Parks	2.37 Ha per 1,000 population	16Ha additional public parks required to alleviate deficiencies	<p>All residents within the Borough should have access to a MetropolitanPark within 3.2km from home;</p> <p>All residents within the Borough should have access to a DistrictPark within 1.2km from home;</p> <p>All residents within the Borough should have access to a Local Park or SmallLocalPark or Pocket Park within 400m from home;</p> <p>All residents within the Borough should have access to an area of public park within 400m from home.</p>	Public parks within the Borough should meet the Green Flag 'good' quality standard. Open spaces identified within each Park Management Plan should be prioritised for improvement.
Children's Play	0.48m <sup>2</sup> per child of formal play space (could be incorporated within any category of public open space provision)	10,000m <sup>2</sup> additional need for children's play provision.	All residents within the Borough should have access to areas of formal and informal play provision for children and teenagers within 400m from home.	Children's play provision within the Borough should be of 'good' quality and provide the range of facilities associated with the size of the facility. The guidelines set out within the National Playing Fields Association 6 acre Standard (2001) should be used to assess levels of adequacy in terms of the range and quality of provision.
Playing Pitches	0.70 Ha of pitch space per 1,000 population.	N/A	All residents within the Borough should have access to a site providing football pitch provision in secure community use within 1200m from home;	Outdoor pitch sports facilities within the Borough should be of 'good' quality and provide the range of facilities required to meet the needs of sports clubs. Those playing fields in secure community use which either under perform in terms of the

## Green Infrastructure

			All residents within the Borough should have access to a range of other outdoor sports facilities.	range of provision provided or the quality of existing provision, should be improved consistent with the guidelines identified in the Council's Playing Pitch Strategy.
Natural Greenspace	1 Ha of GLA designated natural greenspace per 1,000 population. This should be the minimum standard for wards currently below this level rather than the standard for the Borough as a whole	N/A	<p>All residents within the Borough should have access to a GLA designated Site of Borough Importance or Site of Metropolitan Importance for Nature Conservation within 1km from home.</p> <p>Where this is not possible, the Council should identify Sites of Local Importance for Nature Conservation.</p> <p>Measures to address areas of deficiency in access to nature will be looked at in more detail through the Biodiversity Action Plan process</p>	Areas of natural and semi-natural greenspace should be of adequate quality and support local biodiversity. Areas of natural and semi-natural greenspace which either under perform in terms of their value to the local community and local biodiversity should be enhanced consistent with the guidelines identified in the local or regional Biodiversity Action Plans
Allotments	0.36 Ha of allotment land per 1,000 population.	32.2ha of allotment land need	All residents within the Borough should have access to an allotment garden within 800m of home.	Allotment sites should be of adequate quality and support the needs of the local community. Those sites identified within the Allotment Strategy should be prioritised for improvement.

# Green Infrastructure

# Glossary

Table .1 Glossary

Word	Description
<b>Accessibility</b>	The ability of people, including elderly and disabled people, those with young children and those encumbered with luggage or shopping, to move around an area and reach places and facilities.
<b>The Act</b>	The Planning and Compulsory Purchase Act 2004, as amended by the Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008.
<b>Adoption</b>	The stage of the <b>adoption process</b> at which the <b>local planning authority</b> can adopt, by resolution of the Council, <b>the local plan</b> .
<b>Adoption Process</b>	The statutory process by which a <b>local planning authority</b> prepares, publishes and formally adopts a <b>local plan</b> .
<b>Affordability</b>	A measure of whether housing can be afforded by certain groups of households.  The terms <b>affordability</b> and <b>affordable housing</b> have different meanings.
<b>Affordable Housing</b>	Housing intended to meet the needs of eligible households including availability at a cost low enough for them to afford to purchase, with the price being determined with regard to local incomes and local house prices.  <b>Affordable housing</b> is divided into <b>social rented housing and affordable rent</b> , and <b>intermediate housing</b> .  The terms <b>affordability</b> and <b>affordable housing</b> have different meanings.
<b>Affordable Rent</b>	Property available for rent for which rental costs are above those of social rented housing but below market level costs. Typically affordable rental levels are between 41% and 80% of the market level.
<b>Aggregates</b>	Sand, gravel, crushed rock and other bulk materials obtained by quarrying or similar methods and used by the construction industry.
<b>Agriculture</b>	Section 336 of the Town and Country Planning Act 1990 defines 'agriculture' as including: <ul style="list-style-type: none"> <li>• Horticulture, fruit growing, seed growing, dairy farming;</li> <li>• The breeding and keeping of livestock (including any creature kept for the production of food, wool, skins or fur, or for the purpose of its use in the farming of land);</li> <li>• The use of land as grazing land, meadow land, osier land, market gardens or nursery grounds; and</li> <li>• The use of land for woodlands where that use is ancillary to the farming of land for agricultural purposes.</li> </ul>
<b>Air Quality Management Area</b>	Since 1997 local planning authorities have been carrying out a review and assessment of air quality on their area. The aim of the review is to assist authorities in carrying out their statutory duty to work towards meeting the national air quality objectives. If a local authority finds any places where the objectives are not likely to be achieved, it must declare an Air Quality Management Area there.

## Glossary

Word	Description
<b>Area Action Plan</b>	Part of a <b>local plan</b> which sets out a strategy for the planning of areas having a concentration of proposals for change or where land uses and activities and planning issues are particularly complex. Also known as an AAP.
<b>Area Designation</b>	An area identified on the <b>policies map</b> within which certain <b>core policies</b> and development management policies apply.
<b>Area for Regeneration</b>	An area constituting a borough ward in particular socio-economic need, defined on the basis of the index of the 20% most deprived wards in London.
<b>Area of Special Advert Control</b>	Area of Special Advert Control is an area specifically defined by the <b>local planning authority</b> because they consider that its scenic, historical, architectural or cultural features are so significant that a stricter degree of advertisement control is justified in order to conserve visual amenity within that area.
<b>Article 4 Direction</b>	A legal instrument which extinguishes specific 'permitted development rights' from residential buildings within a defined area i.e. the right to do some types of minor works without planning permission. The effect of an article 4 direction is to require planning permission to be obtained from the Council before such work begins. Flats and commercial premises do not have permitted development rights so article 4 directions do not apply to them.
<b>Basin</b>	An area of land designed to retain storm runoff for a short period of time to reduce the risk of flooding and to allow the settlement of solids. These can be used as part of the implementation of a <b>Sustainable Drainage System</b> .
<b>Biodiversity</b>	A measure of the variety of, and number of individuals within different species of plants, animals and other life forms that are present in a defined area.
<b>Blue Ribbon Network</b>	A spatial policy covering London's waterways and water spaces and the land alongside them.
<b>BREEAM</b>	The British Research Establishment Environmental Assessment Method (BREEAM) is used to assess the environmental performance of new and existing buildings.
<b>Building Regulations</b>	A statutory instrument made under powers provided in the Building Act 1984, and applying in England and Wales, which sets minimum construction standards for building works. The current edition of the regulations is 'The Building Regulations 2000' (as amended) and the majority of building projects are required to comply with them. They exist to ensure the health and safety of people in and around all types of buildings (i.e. domestic, commercial and industrial). They also provide for energy conservation, and access to and use of buildings.
<b>Building at Risk</b>	A building identified in a Register kept by English Heritage of <b>listed buildings</b> as being in a poor or dilapidated condition or at risk from neglect or inappropriate changes.
<b>Change of Use</b>	A change in the way that land or buildings are used (see <b>Use Classes Order</b> ). Planning permission is usually necessary in order to change the use from one <b>use class</b> to another.
<b>Character</b>	The individual distinctiveness of an area, arising from a combination of natural and man-made elements with historic, socio-economic and other factors.

## Glossary

Word	Description
<b>Code for Sustainable Homes</b>	A document providing a single national standard to guide industry in the design and construction of sustainable homes. It is a means of driving continuous improvement, greater innovation and exemplary achievement in sustainable home building. The Code measures the <b>sustainability</b> of a home against design categories, rating the 'whole home' as a complete package.
<b>Combined Heat and Power (CHP)</b>	The combined production of heat, usually in the form of steam, and power, usually in the form of electricity.
<b>Commission for Architecture and the Built Environment (CABE)</b>	The Government's advisor on architecture, urban design and public space.
<b>Community Infrastructure Levy</b>	The Community Infrastructure Levy (CIL) will be a new charge which local authorities in England and Wales will be empowered, but not required, to charge on most types of new development in their area. CIL charges will be based on simple formulae which relate the size of the charge to the size and character of the development paying it. The proceeds of the levy will be spent on local and sub-regional infrastructure to support the development of the area.
<b>Community Strategy</b>	A strategy document required by the Local Government Act 2000 to be prepared and implemented by a <b>local planning authority</b> with the aim of improving the social, environmental and economic well being of its area by co-ordinating the actions of local public, private, voluntary and community sectors. Responsibility for producing a community strategy may be passed to a <b>local strategic partnership</b> , which include local authority representatives. Also known as a Sustainable Community Strategy.
<b>Comparison Goods</b>	Retail items not bought on a frequent basis, for example televisions and white goods (fridges, dishwashers etc, and usually being the type of goods that people buy from the store offering the best value for money rather than the one closest to them.
<b>Conservation Area</b>	An area designated for the purpose of protecting the <b>character</b> of an area, and applied to areas of various sizes and characters, ranging from small groups of buildings to town squares or even open spaces. It may include one or more <b>listed buildings</b> .
<b>Conservation Area Character Appraisal</b>	A published document defining the special architectural or historic interest that warrants an area being designated as a <b>conservation area</b> .
<b>Controlled Parking Zone</b>	An area of the public highway within which specified hours of parking control apply. Such controls do not apply to private roads. Also known as a CPZ.
<b>Convenience Goods</b>	Everyday essential household items, such as food.
<b>Core Policy</b>	<p>A short clear statement of the matters which the <b>local planning authority</b> will take into account when it receives an application for planning permission. If the proposed development is not consistent with the policy, the local planning authority is likely to refuse planning permission unless there are exceptional circumstances affecting the site, which would make this particular development acceptable. Core Policies are set out in the <b>Core Strategy</b>.</p> <p>See also <b>development management document</b> for standards the Council will also take into account when determining planning applications.</p>

# Glossary

Word	Description
<b>Core Strategy</b>	A <b>Local Development Document</b> setting out the long-term spatial vision and strategic objectives for the Local Planning Authority area. It includes a spatial strategy, core policies and a monitoring and implementation framework for achieving them. The Core Strategy has the status of a <b>Development Plan Document</b> .
<b>Decent Home</b>	A dwelling which: <ul style="list-style-type: none"> <li>• meets the current statutory minimum standard for housing (ie lack of hazards)</li> <li>• is in a reasonable state of repair</li> <li>• has reasonably modern facilities and services</li> <li>• provides a reasonable degree of thermal comfort.</li> </ul>
<b>Density</b>	A measure of the intensity of development of a plot of land. Residential density can be measured by the number of <b>habitable rooms and dwellings</b> per hectare (hr/unit and hr/ha).
<b>Density Matrix</b>	A residential development density control in the <b>London Plan</b> which seeks to achieve appropriate residential <b>densities</b> across London, based on the <b>public transport accessibility level</b> and <b>character</b> setting of the site and the characteristics of the scheme.
<b>Design and Access Statement</b>	Statements are documents that explain the design thinking behind a planning application. For example, they should show that the person applying for permission has thought carefully about how everyone, including disabled people, older people and very young children, will be able to use the places they want to build.
<b>Development Control/Management</b>	The process whereby a <b>local planning authority</b> receives and considers the merits of a planning application and whether it should be given permission, having regard to the <b>development plan</b> and all other material considerations.
<b>Development Management Document</b>	A document that sets out a council's standards for new developments.
<b>Development Plan</b>	A document that sets out policies and proposals for development and use of land and buildings within the area of a <b>local planning authority</b> . As set out in Section 38(6) of <b>the Act</b> , it consists of the <b>spatial development strategy</b> (London Plan) and Enfield's <b>Local Plan</b> .
<b>Development Plan Document</b>	A spatial planning document that is subject to <b>independent examination</b> , and together with the <b>London Plan</b> , forms the <b>development plan</b> for a <b>local planning authority</b> area for the purposes of <b>the Act</b> . It can be, but is not limited to, a <b>core strategy</b> , a <b>Development Management Document</b> , <b>site schedule</b> or <b>area action plan</b> . Also known as a DPD.  DPDs are shown geographically on a <b>policies map</b> . Individual DPDs or parts of a DPD can be reviewed independently from other DPDs. Each authority must set out the programme for preparing its DPDs in its <b>local development scheme</b> .
<b>District Centre</b>	A group of shops and some service outlets serving part of an urban area and providing a geographic focus for it, separate from and smaller than a <b>major centre</b> , but larger than and with more variety than <b>local centres</b> .
<b>Diversification</b>	The action of diversifying existing economic activity into new areas of business in order to broaden the return on capital or assets.

## Glossary

Word	Description
<b>Energy Efficiency</b>	Using the minimum amount of energy needed to produce a given result.
<b>Enfield Design Guide</b>	A document to provide guidance on how development can be carried out in accordance with good design practice whilst retaining local distinctiveness (see <b>Local Development Scheme</b> for more details).
<b>Enfield Strategic Partnership</b>	The body which produced the <b>community strategy</b> "Enfield's Future" for Enfield borough. See also <b>strategic partnership</b> .
<b>English Heritage</b>	A Government advisory body with responsibility for all aspects of protecting and promoting the historic environment, and responsible for advising the Government on the listing of historic buildings (see <b>listed building</b> ).
<b>Environment Agency</b>	A public body with responsibility for preventing or minimising the effects of pollution on the environment and which issues permits to monitor and control activities that handle or produce waste. It also provides up-to-date information on waste management and deals with other matters such as water issues, including flood protection advice. Also known as EA.
<b>Environmental Impact Assessment</b>	A procedure that must be followed in assessing the impact of certain types of development, usually more significant schemes, before they are granted planning permission. The procedure requires the developer to compile an <b>Environmental Statement</b> describing the likely significant effects of the development on the environment and proposed mitigation measures.
<b>Environment Statement</b>	A document required to be prepared as part of the preparation of an <b>environmental impact assessment</b> describing the likely significant effects of proposed development on the environment and proposed mitigation measures, and which must be circulated to statutory consultation bodies and made available to the public for comment. Its contents, together with any comments on it, must be taken into account by the competent authority (eg local planning authority) before it may grant consent.
<b>Equality Impact Assessment</b>	An Equality Impact Assessment examines a proposed or existing policy, plan, strategy or project to identify what effect its implementation may have on different groups in the community. It can anticipate and recommend ways to avoid any discriminatory or negative consequences for a particular group, and it also enables demonstration of the potential benefits for equality target groups arising from the proposed policy or project.
<b>Evidence Base</b>	The information and data gathered by a local authority to demonstrate the <b>soundness</b> of the policy approach set out in <b>local development documents</b> , and including assessment of the physical, economic, and social characteristics of an area.
<b>Examination-in-Public</b>	see <b>Independent Examination</b>
<b>Greater London Authority</b>	A strategic body constituted under the Greater London Authority Act 1999, consisting of the <b>Mayor of London</b> , the London Assembly and staff, which has responsibility for producing regional strategic policy in a numbers of areas, including transport, economic development, planning, and the environment for the county of Greater London. Also known as the GLA. It produces the <b>London Plan</b> .
<b>Greater London Authority Road Network</b>	see <b>Transport for London Road Network</b>

# Glossary

Word	Description
<b>Green Belt</b>	<p>A designation for land around certain cities and large built-up areas, which aims to keep this land permanently open or largely undeveloped. Its purposes are to:</p> <ul style="list-style-type: none"> <li>• check the unrestricted sprawl of large built up areas</li> <li>• prevent neighbouring towns from merging</li> <li>• safeguard the countryside from encroachment</li> <li>• preserve the setting and special character of historic towns</li> <li>• assist urban regeneration by encouraging the recycling of derelict and other urban land.</li> </ul> <p>The detailed boundaries of such areas are defined in a <b>development plan</b> of each relevant <b>local planning authority</b>.</p>
<b>Green Industry</b>	<p>An environmentally friendly industry such as renewable energy and material processing and recycling facilities.</p>
<b>Green Roofs</b>	<p>Vegetated roofs, or roofs with vegetated spaces. Also known as eco-roofs.</p>
<b>Growth Area</b>	<p>An area identified for new residential development to accommodate population growth, as outlined in the Government's Sustainable Communities Plan and in the case of London including the <b>Thames Gateway</b> and the <b>London-Stansted-Cambridge-Peterborough Corridor</b>.</p>
<b>Habitable Room</b>	<p>A room within a dwelling house, but excluding kitchens less than 13 m<sup>2</sup>; bathrooms; toilets; sculleries not used for cooking; closets; pantries and storerooms; landings; halls; lobbies or recesses and offices or shops used solely for business purposes.</p>
<b>Habitats Directive Assessment</b>	<p>In accordance with the Habitats Directive 92/43/EEC the impacts of a land-use plan are assessed against the conservation objectives of a European Site, which includes <b>Ramsar sites</b>, and to ascertain whether it would adversely affect the integrity of that site. <i>Also know as Appropriate Assessment.</i></p>
<b>Health Impact Assessment</b>	<p>A process for ensuring that land use and planning decision making at all levels consider the potential impacts of decisions on health and health inequalities. It identifies actions that can enhance positive effects and reduce or eliminate negative effects.</p>
<b>Heritage Economic Regeneration Scheme</b>	<p>An initiative launched by <b>English Heritage</b> in June 1998, planned to last for four years, and aimed at deprived areas which have not benefited from the various conservation led urban regeneration schemes of recent years, intended to positively involve business and communities, and with the primary objective of rescuing historic buildings at risk by achieving obvious heritage dividend in terms of benefits such as reuse of vacant upper floors, renewal of the economic base of areas and expansion of employment opportunities. Also known as HERS.</p>
<b>Historic Parks and Gardens</b>	<p>Parks and gardens included in a Register kept by English Heritage, ranging from town gardens and public parks to the great country estates, and reflecting the styles and tastes of past generations, from Medieval knot gardens and deer parks to sweeping 18th-century landscaped gardens, Victorian exotica and post-war examples. A <b>local development plan</b> can include a Register of Local Historic Parks and Gardens.</p>
<b>Housing Association</b>	<p>A not-for-profit body offering for rent independent homes owned by <b>registered providers</b>.</p>

## Glossary

Word	Description
<b>Housing Demand</b>	The quantity of housing that households are willing and able to buy or rent.
<b>Housing Need</b>	The quantity of housing required for households who are unable to access suitable housing without financial assistance.
<b>Housing Tenure</b>	The financial and legal arrangements under which someone has the right to live in a house. The most frequent forms are tenancy, in which rent is paid to a landlord, and owner occupancy. Mixed forms of tenure are also possible.
<b>Independent Examination</b>	A formal hearing, presided over by an Inspector or a Panel of Inspectors appointed by the Secretary of State, to consider the soundness of the <b>local plan</b> .
<b>Index of Multiple Deprivation</b>	A ward-level index made up of six indicators (income, employment, health deprivation and disability, education, skills and training, housing and geographical access to services) for quantifying the degree of disadvantage in a ward, and which can help to identify areas for regeneration. <i>Also known as IMD.</i>
<b>IBP</b>	Commonly used throughout the Development Management Document and Core Strategy as an acronym for Industrial Business Park.
<b>Infrastructure Delivery Plan</b>	The Infrastructure Delivery Plan sets out what social, physical and green infrastructure is required in the Borough to support planned growth in the <b>local plan</b> . The delivery of a <b>sound local plan</b> is dependent on the Infrastructure Delivery Plan.
<b>Inspector's Report</b>	A report issued by the Inspector or Panel who conducted an <b>independent examination</b> , setting out their conclusions on the matters raised at the Examination and detailing the amendments which they require the <b>Local Planning Authority</b> to make to the <b>local plan</b> before it adopts the document. The requirements of an Inspector's Report are binding.
<b>Intermediate Housing</b>	Housing at prices and rents above those of <b>social rented housing</b> , but below market price or rents, and which meet the criteria for <b>affordable housing</b> . These can include shared equity products (eg HomeBuy), other low cost homes for sale and intermediate rent. It can include homes provided by private sector bodies or provided without grant funding. Where such homes meet the definition of <b>intermediate housing</b> , they may be considered, for planning purposes, as <b>affordable housing</b> . Whereas, homes that do not meet this definition, for example, 'low cost market' housing, may not be considered, for planning purposes, as <b>affordable housing</b> .
<b>Joint Waste Development Plan Document</b>	A document setting out the planning policies for waste management and identifying new and expanded waste facilities in North London. Also known as JWDPD.  In the case of Enfield borough this document is usually referred to as the North London Waste Plan (NLWP).
<b>Lee Valley Corridor</b>	The area of strategically important development opportunities and existing industry either side of the River Lee, in parts of Enfield, Hackney, Haringey, Newham, Tower Hamlets and Waltham Forest boroughs.
<b>Lee Valley Regional Park</b>	A 4,000 ha (10,000 acre) regional park that stretches for 42 km (26 miles) on both sides of the River Lee, from the River Thames to Ware in Hertfordshire.

## Glossary

Word	Description
<b>Lee Valley Regional Park Authority</b>	A body constituted on 1 January 1967 under the Lee Valley Regional Park Act 1966 with responsibility for the <b>Lee Valley Regional Park</b> and for developing a wide range of leisure, sport and recreation, including nature conservation facilities and the protection and enhancement of the natural environment.
<b>Lifetime Homes</b>	Homes designed to meet the changing needs of the population from young children to the elderly, and thereby meeting the varying needs of numerous changes of occupiers in the same home by being designed to be accessible, adaptable and convenient and able to accommodate people with moderate mobility difficulties.
<b>Listed Building</b>	An historic building recorded on a statutory list of buildings of 'special architectural or historic interest' compiled by the Secretary of State for Culture, Media and Sport under the Planning (Listed Buildings and Conservation Areas) Act 1990, on advice from <b>English Heritage</b> , to ensure that the architectural and historic interest of the building is carefully considered before any alterations, outside or inside, are agreed. A building is graded I, II* or II, with grade I being the highest. Listing includes the interior as well as the exterior of the building, and any buildings or permanent structures (e.g. wells) within the curtilage.
<b>Local Centre</b>	A small group of shops and limited service outlets serving a local catchment (for example, a suburban housing estate). Sometimes referred to as a neighbourhood centre.
<b>Local Development Document</b>	A document which forms part of the <b>local plan</b> and which can be adopted and revised as a single entity and includes <b>development plan documents</b> , <b>supplementary planning documents</b> and the <b>statement of community involvement</b> .
<b>Local Development Framework</b>	The term previously used to describe all local plan documents produced by the local development authority. Also known as an LDF.
<b>Local Development Scheme</b>	A document setting out the intentions of the <b>local planning authority</b> for its <b>plan making</b> , in particular, the <b>local plans</b> it intends to produce and the timetable for their production and review. Also known as an LDS.
<b>Local Implementation Plan</b>	A statutory strategic transport plan produced by London boroughs bringing together transport proposals to implement the <b>Mayor of London's</b> Transport Strategy at the local level. <i>Also known as an LIP.</i>
<b>Local Implementation Plan (HCA - Single Conversation)</b>	A document setting out the Council's long term resource requirements to deliver its Place Shaping vision and Housing Strategy objectives. This is part of the Single Conversation the Homes and Communities Agency's approach to placeshaping and delivery through partnership working. <i>Also known as LIP.</i>
<b>Local List</b>	<p>A list compiled by a local planning authority of buildings of special local architectural or historic interest but which do not meet the criteria to be statutorily listed by <b>English Heritage</b> as <b>listed buildings</b>.</p> <p>Councils are empowered by PPG 15 to draw up local lists and to support them through appropriate planning policies with the intention that, by drawing attention to the special interest of these buildings, owners will be encouraged to take particular care when undertaking any alterations or extensions.</p>

## Glossary

Word	Description
<b>Local Plan</b>	The plan for the future development of the local area, drawn up by the local planning authority in consultation with the community. In law this is described as the <b>development plan documents</b> adopted under the <b>Planning and Compulsory Purchase Act 2004</b> . Current <b>core strategies</b> or other planning policies, which under the regulations would be considered to be development plan documents, form part of the <b>Local Plan</b> . The term includes old policies which have been saved under the 2004 Act.
<b>Local Planning Authority</b>	A body charged under <b>the Act</b> with the responsibility for preparing a <b>local plan</b> for a specific area and for deciding whether development proposals should receive planning permission. Also known as an LPA. Enfield Council is the local planning authority for the London Borough of Enfield.
<b>Local Strategic Partnership</b>	A partnership of stakeholders which is usually non-statutory and multi-agency and which develops ways of involving local people from the public, private, community and voluntary sectors in the planning processes which shape the future of their neighbourhood and how services are provided, resulting in production of a <b>community strategy</b> . The <b>Enfield Strategic Partnership</b> is the local strategic partnership responsible for producing Enfield's <b>community strategy</b> .
<b>Locally Listed Building</b>	A building included on a <b>local list</b> .
<b>London Development Agency</b>	One of the <b>Greater London Authority</b> group organisations, acting on behalf of the <b>Mayor of London</b> , whose aim is to further the economic development and regeneration of London. Also known as the LDA.
<b>London Plan</b>	Also known as the Spatial Development Strategy, this document was published by the <b>Mayor of London</b> in 2011 and provides a strategic framework for the boroughs' <b>local plans</b> . It has the status of a <b>development plan</b> under the Planning and Compulsory Purchase Act.
<b>London-Stansted-Cambridge-Peterborough Corridor</b>	A land corridor covering the areas around and between North London, Harlow, Stansted Airport and Cambridge. Also known as the LSPC.  It has been prioritised for development and growth by the Government in its Communities Plan ("Sustainable Communities: Building for the future").
<b>Low and Zero Carbon Technology</b>	Installations which produce energy that minimises the carbon emissions associated with generation. The technologies include those which are inexhaustible and harness energy flows that occur naturally in the environment, for example energy from the wind and solar power. The term also includes technologies that use carbon-emitting fuels but at a high level of efficiency.
<b>LSIS</b>	Commonly used throughout the Development Management Document and Core Strategy as an acronym for Locally Significant Industrial Sites.
<b>Major Development</b>	For dwellings, a major development is one where the number of residential units to be constructed is greater than 10, or where the number of dwellings to be constructed is not known, the site area is greater than 0.5 hectares.  For all other uses a major development is one where the floor space to be created by the development is more than 1,000 square metres or the site area is greater than 1 hectare.

## Glossary

Word	Description
<b>Major Centre</b>	Important shopping and service centres, often with a borough-wide or larger catchment. Enfield Town is the borough's major centre.
<b>Market Housing</b>	Private housing for rent or for sale, where the price is set in the open market.
<b>Market Rent</b>	The cost of renting housing in the private sector.
<b>Mayor of London</b>	An elected politician who heads the <b>Greater London Authority</b> and is responsible for budgeting and strategic planning of some governmental functions across the whole of the region of London. These include transport, police, fire and emergency services, economic development and regional spatial planning.
<b>Metropolitan Open Land</b>	Strategic open land within the urban area that contributes to the structure of London. Also known as MOL.
<b>Minor Development</b>	For dwellings, a minor development is one where the number of residential units to be constructed is fewer than 10, or where the number of dwellings to be constructed is not known, the site area is less than 0.5 hectares.  For all other uses a minor development is one where the floor space to be created by the development is less than 1,000 square metres or the site area is less than 1 hectare.
<b>Mixed Use Development</b>	Development for a variety of activities on single sites or across wider areas such as town centres and redundant industrial land.
<b>Monitoring Report</b>	Measures and assesses the implementation of the <b>local development scheme</b> and the extent to which policies in <b>local plan</b> are being successfully implemented. Previously known as an Annual Monitoring Report (AMR).
<b>National Playing Fields Association</b>	A body charged with responsibility for ensuring that everyone has play, sport and recreation space close to where they live.
<b>Neighbourhood Renewal Fund</b>	A funding scheme to enable the councils of England's 88 most deprived local government areas, in collaboration with their <b>Local Strategic Partnership</b> , to improve services, to help narrow the gap between deprived areas and the rest of the country.
<b>National Planning Policy Framework</b>	The National Planning Policy Framework (2012) sets out the Government's planning policies for England and how these are expected to be applied. The NPPF replaces all of the Planning Policy Statements (PPS), Planning Policy Guidance (PPG), circulars and guidance notes.
<b>Non Self Contained Accommodation</b>	Accommodation where occupants have the shared use of at least one of the following: <ul style="list-style-type: none"> <li>● kitchen</li> <li>● toilet</li> <li>● bathroom facilities.</li> </ul>
<b>North London Chamber of Commerce</b>	A membership organisation run by business for business which represents the interests of business and commercial organisations.
<b>North London Strategic Alliance</b>	The sub-regional <b>strategic partnership</b> for North London established in 1999 which brings together public, private and voluntary organisations working in Barnet, Enfield, Haringey and Waltham Forest. Also known as NLSA.

## Glossary

Word	Description
<b>North London Sub-regional Development Framework</b>	The non-statutory framework providing guidance on Opportunity, Intensification and Regeneration Areas, town centres, suburbs and <b>Strategic Employment Locations</b> produced by the <b>Mayor of London</b> in partnership with boroughs and other stakeholders Also known as NLSRDF.
<b>North London Waste Authority</b>	Statutory waste disposal authority established in 1986 after the abolition of the Greater London Council to arrange the disposal of waste collected by its seven constituent boroughs: Barnet, Camden, Enfield, Hackney, Haringey, Islington and Waltham Forest. Also known as NLWA.
<b>North London Waste Plan</b>	see <b>Joint Waste Development Plan Document</b>
<b>Open Space</b>	All areas free of development. This includes space of public value, such as public landscaped areas, playing fields, parks and play areas, and also including areas of water such as rivers, canals, lakes and reservoirs, which can offer opportunities for sport and recreation or can also act as a visual amenity and a haven for wildlife.
<b>Opportunity Area</b>	One of a number of areas identified in the <b>London Plan</b> for accommodating large scale development to provide substantial numbers of new employment and housing, with a mixed and intensive use of land and assisted by good public transport accessibility.
<b>Outer London</b>	The Outer London boroughs are as follows: Barking and Dagenham, Barnet, Bexley, Brent, Bromley, Croydon, Ealing, Enfield, Haringey, Harrow, Havering, Hillingdon, Hounslow, Kingston upon Thames, Merton, Newham, Redbridge, Richmond upon Thames, Sutton, Waltham Forest.
<b>Outer London Commission</b>	A body established by the <b>Mayor of London</b> to advise how <b>Outer London</b> can play its full part in the city's economic success.
<b>Planning Policy Statement</b>	Now replaced by the <b>NPPF</b> , this was a range of documents which previously set out the Government's land use planning policies for England in respect of planning and land use. Also known as PPSs. Planning Policy Statements replaced Planning Policy Guidance Notes, and were issued by the <b>Department for Communities and Local Government</b> .
<b>PIL</b>	Commonly used throughout the Development Management Document and Core Strategy as an acronym for Preferred Industrial Location.
<b>Policies Map</b>	A map of the <b>local planning authority's</b> area. Previously referred to as the Proposals Map. It is the spatial representation of the authority's adopted development plan, showing: <ul style="list-style-type: none"> <li>• Areas of protection, such as nationally protected landscapes.</li> <li>• The extent of the area in which the planning policies of the <b>local planning authority</b>, that are not borough-wide, apply;</li> <li>• Sites for particular future land uses or developments; and</li> <li>• Locations of proposed or existing area action plans.</li> </ul>
<b>Primary Care Trust</b>	Statutory body responsible for delivering health care and health improvements to its local area. Also known as PCT and NHS Enfield.
<b>Primary Shopping Frontage</b>	An area where retailing and the number of shops in a <b>major centre</b> or <b>district centre</b> is most concentrated.

## Glossary

Word	Description
<b>Primary Shopping Area</b>	Consists of the Enfield Town combined primary and secondary shopping frontages and the entire shopping frontages in the district centres.
<b>Public Realm</b>	Areas that are accessible to everyone (whether publicly or privately owned). In urban areas, this includes most streets, squares and parks.
<b>Public Transport Accessibility Level</b>	A quantified measure of the extent and ease of access by public transport to facilities and services, and the degree of access to the public transport network. Also known as PTAL.
<b>Ramsar Sites</b>	Ramsar sites are wetlands of international importance, designated under the Ramsar Convention.
<b>Regeneration Areas</b>	Regeneration Priority Areas and other areas subject to regeneration or estate renewal not defined on the Policies Map.
<b>Regeneration Priority Areas</b>	Areas defined on the Policies Map formally known as Place Shaping Areas.
<b>Registered Provider</b>	Providers of social rented housing registered with the Tenant Services Authority (TSA). Includes both housing associations and profit-making landlords which address the same housing priorities and are subject to the same standards.
<b>Residential Care Home</b>	An establishment which provides personal care assistance to its residents, such as dressing and washing, where staff can also care for residents during short periods of illness.
<b>Saved policy or plan</b>	<p>A unitary development plan or a part or parts of a unitary development plan which is exempted from a general order rescinding the plan or a class or classes of provisions of such plans.</p> <p>Enfield's adopted <b>unitary development plan</b> was saved (continued in force) automatically for three years from the date of commencement of the <b>Planning and Compulsory Purchase Act</b> in 2004. At the expiry of this period in 2007 the Enfield <b>UDP</b> policies were required to undergo an assessment to assess their appropriateness for saving beyond this time period until such time as the <b>UDP</b> was replaced by the <b>local plan</b>. As a result of this assessment most of Enfield's <b>unitary development plan</b> policies were saved whilst policies not judged as appropriate expired in September 2007.</p> <p>UDP policies remain following adoption of the Core Strategy, but these will be replaced upon adoption of the <b>Development Management Document</b>.</p>
<b>Scheduled Ancient Monument</b>	A nationally important site or monuments given legal protection by being placed on a list (schedule). In England, <b>English Heritage</b> is responsible for identifying appropriate sites that are then officially scheduled by the Secretary of State for Culture, Media and Sport.
<b>Secondary Shopping Frontage</b>	A retailing area, secondary to the <b>primary shopping frontage</b> , that provides greater opportunities for a diversity of uses.

## Glossary

Word	Description
<b>Section 106 Agreement</b>	A legal agreement under Section 106 of the Town & Country Planning Act 1990 between a planning authority and a developer, in order to achieve the aims of relevant planning policies through ensuring that certain extra works related to a development are undertaken. Also see Community Infrastructure Levy (CIL).
<b>Sheltered Housing</b>	<p>A form of housing provision which offers a range of services to help people to live independently with the added security of having someone to call on in emergencies and different from other housing because a scheme manager or warden lives on the premises or nearby.</p> <p>Some schemes are designed specifically for people with disabilities and may have specialised facilities and specially trained staff to provide care.</p>
<b>SIL</b>	Commonly used throughout the Development Management Document and Core Strategy as an acronym for Strategic Industrial Land.
<b>Site of Borough Importance for Nature Conservation</b>	A site which contains a significant example at borough level of a natural habitat which contains particularly species or assemblages of species which are rare in the borough or which contain important populations of species, or which is of particular significance within otherwise heavily built-up areas of London.
<b>Site of Importance for Nature Conservation</b>	<p>A site originally identified by the Greater London Council, or later by the London Ecology Unit, London boroughs or <b>Greater London Authority</b>, chosen to represent the most significant wildlife habitats and emphasise the value of access for people. Also known as a SINC.</p> <p>SINCs are classified into <b>sites of metropolitan, borough and local importance for nature conservation</b>.</p>
<b>Site of Local Importance for Nature Conservation</b>	A <b>site of importance for nature conservation</b> which is, or may be, of particular value to people nearby (such as residents or schools) and is particularly important in areas otherwise deficient in nearby wildlife sites, as determined by the <b>GLA</b> . Only those sites that provide a significant contribution to the ecology of a local area are defined as sites of local importance.
<b>Site of Metropolitan Importance for Nature Conservation</b>	<p>A site which contains a significant example of a natural London habitat which contains particularly rare species, rare assemblages of species or important populations of species, or which is of particular significance within otherwise heavily built-up areas of London. Also known as a SMINC.</p> <p>SMINCs are of the highest priority for protection.</p>
<b>Site of Special Scientific Interest</b>	A site identified under the Wildlife and Countryside Act 1981 (as amended by the Countryside and Rights of Way Act 2000) as an area of special interest by reason of any of its flora, fauna, geological or physiographical features (basically, plants, animals, and natural features relating to the Earth's structure). Also known as an SSSI.
<b>Sites Schedule</b>	A <b>development plan document</b> setting out the allocations of sites for specific uses/developments.
<b>Small and Medium sized Enterprise</b>	An independent business managed by its owner or part owners and having a small market share either by number of employees or turnover. Also known as a SME.

## Glossary

Word	Description
<b>Social Exclusion</b>	A term for the result of people or areas suffer from a combination of linked problems, such as unemployment, poor skills, low incomes, poor housing, high crime environments, bad health and family breakdown.
<b>Social Rented Housing</b>	Rented housing owned and managed by local authorities and <b>registered providers</b> , for which guideline target rents are determined through the national rent regime. It may also include rented housing owned or managed by other persons and provided under equivalent rental arrangements to the above, as agreed with the local authority or with the <b>Housing Corporation</b> as a condition of grant.
<b>Soundness</b>	The examination by an independent inspector of a <b>local plan</b> will consider as to whether the local plan is sound, as set out in the <b>NPPF</b> ; namely that it is positively prepared, justified, effective, and consistent with national policy.
<b>Spatial Development Strategy</b>	see <b>London Plan</b>
<b>Spatial Planning</b>	An ongoing process of managing change which goes beyond traditional land use planning to bring together and integrate policies for the development and use of land with other policies and programmes which influence the nature of places and how they function. This includes policies which can affect land use by influencing the demands on, or needs for, development, but which are not capable of being delivered solely or mainly through the granting or refusal of planning permission and which may be implemented by other means.
<b>Spatial Portrait</b>	A succinct description of the area, designed to portray its individual character, key trends and the current 'drivers for change'.
<b>Statement of Community Involvement</b>	A document which sets out the standards that a <b>local planning authority</b> will achieve with regard to involving local communities in the preparation of <b>Local Development Documents</b> and <b>development control</b> decisions, and which is not a <b>Development Plan Document</b> but is subject to <b>independent examination</b> .
<b>Strategic Developments</b>	Planning applications that must be referred to the Mayor of London, under the Town and Country Planning (Mayor of London) Order 2008.
<b>Strategic Environmental Assessment</b>	A generic term used to describe environmental assessment as applied to policies, plans and programmes. European 'SEA Directive'(2001/42/EC) requires a formal 'environmental assessment of certain plans and programmes, including those in the field of planning and land use'. It is a tool for integrating environmental considerations into decision-making by ensuring that any significant environmental effects of the decision are taken into account, and must form an integral part of the adoption process for <b>Local Development Documents</b> and must be taken into account right from the initial stages of plan preparation. Also known as an SEA.
<b>Strategic Flood Risk Assessment (SFRA)</b>	<b>Local planning authorities</b> (LPA) are required to undertake a Strategic Flood Risk Assessment (SFRA) as part of the planning process in accordance the NPPF. SFRAs provide information about flood risk throughout the area of the LPA, either individually or combined with neighbouring LPAs. The SFRA will consider the effects of climate change on river and coastal flooding, identify the risk from other sources of flooding, and consider appropriate policies for development in or adjacent to flood risk areas.

## Glossary

Word	Description
<b>Strategic Growth Areas</b>	Areas defined in Core Policy 1 of the Core Strategy (Central Leaside, North East Enfield, Enfield Town and the area around the North Circular Road at New Southgate) and Edmonton Green.
<b>Strategic Partnership</b>	A co-operative arrangement set up to bring together major public sector organisations, local businesses, community and voluntary groups, to create a healthy, prosperous, cohesive community living in a borough that is safe, clean and green and responsible for producing a <b>Community Strategy</b> .
<b>Strategic Road Network</b>	see <b>Transport for London Road Network</b>
<b>Subdivision</b>	The division of a lot, tract, or parcel of land into two or more lots.
<b>Submission DPD</b>	A stage in the statutory process for the adoption of <b>local development documents</b> that are also <b>development plan documents</b> . The <b>local planning authority</b> must submit the draft DPD, known as the submission DPD, to the Secretary of State for <b>independent examination</b> .
<b>Supplementary Planning Document (to the Local Plan)</b>	A <b>local development document</b> providing supplementary information in respect of the policies in <b>development plan documents</b> and not forming part of the <b>development plan</b> nor subject to <b>independent examination</b> . Instead the <b>local planning authority</b> can approve the document by formal resolution of the Council, but it must be subjected to full public consultation if it is to be accorded any weight in decisions on development proposals. Also known as an SPD.
<b>Sustainability Appraisal</b>	The examination of a <b>local development document</b> to ascertain whether its policies and proposals reflect sustainable development objectives (i.e. social, environmental and economic factors). Also known as an SA.
<b>Sustainable Community Strategy</b>	see <b>Community Strategy</b>
<b>Sustainable Community</b>	<p>A community which achieves the objectives set out in the Government's "Sustainable Communities: Building for the Future":</p> <ul style="list-style-type: none"> <li>• A flourishing local economy to provide jobs and wealth</li> <li>• Strong leadership to respond positively to change</li> <li>• Effective engagement and participation by local people, groups and businesses, especially in the planning, design and long-term stewardship of their community, and an active voluntary and community sector</li> <li>• A safe and healthy local environment with well-designed public and green space</li> <li>• Sufficient size, scale and <b>density</b>, and the right layout to support basic amenities in the neighbourhood and minimise use of resources (including land)</li> <li>• Good public transport and other transport infrastructure both within the community and linking it to urban, rural and regional centres</li> <li>• Buildings – both individually and collectively – that can meet different needs over time, and that minimise the use of resources</li> <li>• A well-integrated mix of decent homes of different types and tenures to support a range of household sizes, ages and incomes</li> <li>• Good quality local public services, including education and training opportunities, health care and community facilities, especially for leisure</li> <li>• A diverse, vibrant and creative local culture, encouraging pride in the community and cohesion within it</li> </ul>

# Glossary

Word	Description
	<ul style="list-style-type: none"> <li>• A "sense of place"</li> <li>• The right links with the wider regional, national and international community.</li> </ul>
<b>Sustainable Design and Construction</b>	<p>A philosophy of creating buildings that meet the needs of building users and the wider community and minimises environmental impact by:</p> <ul style="list-style-type: none"> <li>• adopting forms of design and construction that minimise adverse impacts on the environment and that protect and enhance the diversity of nature;</li> <li>• providing buildings that enhance the quality of life of everyone both now and in the future; and</li> <li>• designing and constructing buildings that are high quality working environments that lead to greater productivity.</li> </ul>
<b>Sustainable Development</b>	<p>The core principle underpinning contemporary town planning in the UK, based on the ideal of ensuring a better quality of life through development that meets the needs of the present without compromising the ability of future generations to meet their own needs. The Government has set out four aims for <b>sustainable development</b>:</p> <ul style="list-style-type: none"> <li>• social progress which recognises the needs of everyone;</li> <li>• effective protection of the environment;</li> <li>• the prudent use of natural resources; and,</li> <li>• the maintenance of high and stable levels of economic growth and employment.</li> </ul> <p>These aims should be pursued in an integrated way through a sustainable, innovative and productive economy that delivers high levels of employment, and a just society that promotes social inclusion, <b>sustainable communities</b> and personal well being, in ways that protect and enhance the physical environment and optimise resource and energy use.</p>
<b>Sustainability</b>	see <b>Sustainable Development</b>
<b>Sustainable Drainage System</b>	<p>A drainage system designed to:</p> <ul style="list-style-type: none"> <li>• control the quantity of run-off from a development;</li> <li>• improve the quality of the run-off ;</li> <li>• enhance the nature conservation, landscape and amenity value of the site and its surroundings.</li> </ul> <p>Also known as SUDs.</p> <p>SUDS deal with run-off as close to its source as possible and balance all three objectives, rather than focusing only on flood prevention. Two examples are Swales and basins which retain water for a period of time prior to discharge to a natural watercourse. SUDs are one of a number measures to manage flood risk.</p>
<b>Swale</b>	A type of <b>sustainable drainage system</b> which consists of a grassed depression which lead surface water overland from the drained surface to a storage or discharge system, typically using the green space of a roadside margin.
<b>Third Sector</b>	A term used to describe the collection of non-governmental organisations that are value driven and principally reinvest their surpluses to further social, environmental or cultural objectives. This includes voluntary and community organisations, charities, social enterprises, cooperatives and mutuals and housing associations.

## Glossary

Word	Description
<b>Topography</b>	A description (or visual representation on a map) of the shape of the land, for example, contours or changes in the height of land relative to sea level.
<b>Townscape</b>	The general appearance of a built-up area, for example a street, a town or city.
<b>Transport Assessment</b>	An assessment of the availability of, and levels of access to, all forms of transportation from a site.
<b>Transport for London</b>	One of the <b>GLA</b> group organisations, accountable to the <b>Mayor of London</b> , with responsibility for delivering an integrated and sustainable transport strategy and operation for London. Also known as TfL.
<b>Transport for London Road Network</b>	The mayor's term for the <b>Greater London Authority Road Network</b> as described in the Greater London Authority Act 1999 and comprising 550 km of London's red routes and other important streets. Also known as the TLRN.
<b>Unitary Development Plan</b>	A type of <b>development plan</b> introduced in 1986 and replaced by <b>local plans (local development frameworks)</b> in the <b>Act</b> . Enfield's unitary development plan was adopted in March 1994. Also known as a UDP.
<b>Upper Lee Valley Opportunity Area</b>	see <b>Opportunity Area</b>
<b>Urban Design</b>	The design of buildings, groups of buildings, spaces and landscapes, in villages, towns and cities, to create successful development.
<b>Urban Grain</b>	The pattern, size and arrangement of street blocks and plots.
<b>Use Class</b>	<p>A category of landuse activities requiring planning permission which is set according to a <b>use classes order</b>. The uses are grouped into classes A, B, C and D and sui generis (a use not within a specific class). The classes are:</p> <p>A1 (shops);</p> <p>A2 (financial and professional services);</p> <p>A3 (restaurants and cafes);</p> <p>A4 (drinking establishments);</p> <p>A5 (hot food takeaways);</p> <p>B1 (business);</p> <p>B2 (general industry);</p> <p>B8 (storage and distribution);</p> <p>C1 (hotels);</p> <p>C2 (residential institutions);</p> <p>C2A (secure residential institutions);</p> <p>C3 (dwelling houses);</p> <p>D1 (non-residential institutions);</p>

# Glossary

Word	Description
	<p>D2 (assembly and leisure);</p> <p>Sui Generis (a use not within a specific class).</p>
<b>Use Classes Order</b>	<p>A legislative mechanism under the terms of the Town and Country Planning Act 1990, as amended by the Use Classes (Amendment) Order 2005, and the General Permitted Development (Amendment) Order 2005, which sets out when permission is or is not required for changes to the use of land and buildings, and the circumstances under which such changes can be undertaken.</p>
<b>Wider Determinants of Health</b>	<p>A wide range of factors which contribute to the health of individuals, including:</p> <ul style="list-style-type: none"> <li>● Their age, sex and hereditary factors;</li> <li>● Individual lifestyle factors;</li> <li>● Social and community influences;</li> <li>● Living and working conditions;</li> <li>● General socio-economic, cultural and environmental conditions.</li> </ul>