

# former Middlesex University site and Ponders End High Street

in the London Borough of Enfield

planning application no. 15/04518/FUL

## Strategic planning application stage 1 referral

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008.

## The proposal

Comprehensive redevelopment to provide 167 new homes and 1,379 sq.m. of commercial and community floorspace (including library and community hall/nursery) in buildings of between three and seven-storeys.

## The applicant

The applicant is **Lovell Partnerships Ltd.**, and the architect is **Karakusevic Carson Architects**.

## Strategic issues

The proposed **residential-led mixed use** redevelopment is **strongly supported** in strategic planning terms.

Nevertheless, outstanding issues with respect to **social infrastructure, housing, sustainable development** and **transport** need to be resolved prior to the Mayor's decision making stage.

## Recommendation

That Enfield Council be advised that whilst the scheme is broadly supported in strategic planning terms, the application does not yet fully comply with the London Plan for the reasons set out in paragraph 40 of this report. The resolution of those issues could lead to the application becoming compliant with the London Plan.

## Context

1 On 21 October 2015 the Mayor of London received notice from Enfield Council of a planning application of potential strategic importance to develop the above site for the above uses. The associated planning documents were received on 6 November 2015. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008 the Mayor has until 17 December 2015 to provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

2 The application is referable under Category 1A.1 of the Schedule to the Order 2008: *“Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats”*

3 Once Enfield Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or, allow the Council to determine it itself.

4 The Mayor of London’s statement on this case will be made available on the GLA website [www.london.gov.uk](http://www.london.gov.uk).

## **Site description**

5 The site is located in Ponders End, within the Upper Lee Valley Opportunity Area. Following approval for the conversion of the majority of the former Middlesex University campus (including the Grade II Listed Broadbent building and gymnasium) to a Free School, this application deals with the remainder of the university campus (east of the Free School site), a multi-storey car park fronting Queensway, and a collection of High Street plots (nos. 188 to 214) fronting Ponders End High Street. The site is bounded to the south by existing suburban residential development, and to the north by Queensway and the Queensway industrial estate. The eastern boundary of the site is defined by Ponders End High Street - which has been awarded funding from TfL to deliver public realm improvements between Nags Head Road and South Street.

6 The High Street part of the site includes a mix of single to four-storey buildings, which accommodate a range of small scale retail units, a nursery and a library. The site also includes a cleared High Street plot, which was previously occupied by a former police station and a public house.

7 The A10 Great Cambridge Road is the closest section of the Transport for London Road Network and is located approximately 700 metres to the west of the site. The nearest sections of the Strategic Road Network are the A110 Southbury Road (250 metres to the north) and the A1010 High Street (200 metres to the east). The site is served by eight bus routes with bus stops located within walking distance on Southbury Road and High Street. Also within reasonable walking distance of the site is Southbury national rail station (250 metres northwest), providing links south to Liverpool Street and north to Cheshunt, and Ponders End national rail station (960 metres to the east) providing links south to London Liverpool Street and north to Hertford East. National Cycle Network Route One runs alongside the Lee Navigation, approximately one kilometre from the site. Overall, the site has a public transport accessibility level of three, on a scale of one to six, where six represents the most accessible locations.

## **Details of the proposal**

8 Comprehensive redevelopment to provide 167 new homes and 1,379 sq.m. of commercial and community floorspace arranged as follows: a four-storey block of 21 self-contained flats with communal rooftop play area; a three-storey block of 18 terraced houses; 22 three-storey terraced houses in 4 blocks (PHASE 1); a four-storey block of 19 self-contained flats with community hall/nursery on ground floor and communal rooftop play area; a seven-storey block of 25 self-contained flats with Library at ground and first floor; a part 4, part 6-storey block of 40 self-contained flats with five commercial units at ground floor; and, 22 three-storey terraced houses in 4 blocks (PHASE 2) with cycle and bin stores to ground floor of each block, new access and access roads, parking and associated landscaping.

## Case history

9 On 5 March 2013 Enfield Council issued planning permission P12-02677PLA for comprehensive residential-led mixed use redevelopment of the former Middlesex University campus and Ponders End High Street plots. The Mayor had previously stated on 27 February 2013, that he supported the scheme in strategic planning terms, and was content for the Council to grant permission (refer to GLA report PDU/2903a/02).

10 On 25 February 2015 Enfield Council issued planning permission 14/02996/FUL for conversion of existing buildings at the western side of the former Middlesex University campus to an eight form entry secondary academy with a 480 pupil sixth form. This application was not referable to the Mayor of London.

11 On 23 April 2015 a GLA pre-application meeting was held at City Hall to discuss the current scheme for the remainder of the former Middlesex University campus, and the adjacent Ponders End High Street plots. The advice issued by GLA officers on 8 May 2015 stated that the principle of residential-led mixed use development at this site is strongly supported, and the proposed masterplan re-design generally responds well to the new role of the former Middlesex University campus (in terms of accommodating a Free School). The applicant was, nevertheless, advised to ensure that matters with respect to housing; social infrastructure; urban design; inclusive access; sustainable development; and, transport are addressed by the future application.

## Strategic planning issues and relevant policies and guidance

12 The relevant strategic issues and corresponding policies are as follows:

- Opportunity Area *London Plan;*
- Social infrastructure *London Plan;*
- Housing *London Plan; Housing SPG; draft Interim Housing SPG; Housing Strategy; Shaping Neighbourhoods: Play and Informal Recreation SPG; Shaping Neighbourhoods: Character and Context SPG;*
- Affordable housing *London Plan; Housing SPG; draft Interim Housing SPG; Housing Strategy;*
- Density *London Plan; Housing SPG; draft Interim Housing SPG;*
- Urban design *London Plan; Shaping Neighbourhoods: Character and Context SPG; Housing SPG; draft Interim Housing SPG; Shaping Neighbourhoods: Play and Informal Recreation SPG;*
- Inclusive access *London Plan; Accessible London: achieving an inclusive environment SPG;*
- Sustainable development *London Plan; Sustainable Design and Construction SPG; Mayor's Climate Change Adaptation Strategy; Mayor's Climate Change Mitigation and Energy Strategy; Mayor's Water Strategy; Mayor's Ambient Noise Strategy;*
- Transport and parking *London Plan; the Mayor's Transport Strategy;*
- Crossrail *London Plan; and, Mayoral Community Infrastructure Levy.*

13 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the 2010 Enfield Core Strategy and Local Plan Policies Map; 2014 Enfield Development Management Document; and, the London Plan (Consolidated with Alterations since 2011).

- 14 The following are also relevant material considerations:
- The National Planning Policy Framework, Technical Guide to the National Planning Policy Framework and National Planning Practice Guidance;
  - Draft Minor Alterations to the London Plan 2015;
  - Upper Lee Valley Opportunity Area Planning Framework 2013; and,
  - Draft North East Enfield Area Action Plan (post examination stage).

## Principle of development

15 The former Middlesex University campus and adjoining High Street buildings are identified as a key strategic site within the Upper Lee Valley Opportunity Area Planning Framework (OAPF) and emerging North East Enfield Area Action Plan (AAP). These documents, in conjunction with the March 2013 consent (P12-02677PLA), firmly establish the principle of comprehensive residential-led mixed use redevelopment at this site. Accordingly, the principle of this development is strongly supported in strategic planning terms.

## Social infrastructure and sustainable communities

16 London Plan Policy 3.16 seeks to protect and enhance the capital's social infrastructure in order to meet the needs of London's growing and diverse population. As discussed in paragraph 6, the site currently accommodates a library and nursery (as well as various retail units) at Ponders End High Street. The proposed comprehensive redevelopment would result in the displacement of these uses, however, in accordance with the principles of Policy 3.16 it is noted that the applicant proposes to reprovide space for these uses as part of the redevelopment. This is strongly supported, however, noting a proposed overall 82 sq.m. reduction of Use Class D1 floorspace, GLA officers seek confirmation that the services provided by the replacement community facilities could be maintained at (or above) current levels.

17 Notwithstanding the above, the proposal to provide the library within a standalone building on the High Street is supported as a means of marking its civic importance. The arrangement also allows for the creation of a new public space adjacent to the Jalalia Jamme Masjeed Mosque, which is particularly welcome. With respect to the new retail/commercial units, the applicant is encouraged to develop a contingency 'meanwhile use' strategy - to avoid inactive ground floor units in the event that occupier uptake is slower than anticipated.

## Housing

18 The application proposes the delivery of 167 new homes. The table below sets out the schedule of accommodation proposed.

Unit type	Affordable rent	Intermediate	Private market	Total
One-bedroom	9	16	39	64
Two-bedroom	6	11	14	31
Three-bedroom	10	0	36	46
Four-bedroom	0	0	26	26
<b>Total</b>	<b>25</b>	<b>27</b>	<b>115</b>	<b>167</b>

19 It is noted that the current proposal represents a relative reduction of 67 units compared to that approved for this part of the site under permission P12-02677PLA. However, the proposed residential density (282 habitable rooms per hectare) is still comfortably within the range identified by the London Plan. Noting also the intention to provide larger family sized

housing typologies in response to local demand, GLA officers satisfied that the proposal would optimise housing supply in accordance with London Plan policies 3.3 and 3.4.

20 The proposed housing mix comprises 31% affordable housing by unit, with a tenure split of 48% affordable rent and 52% intermediate. The affordable rent component of the schedule would achieve a 40% provision of family sized housing. Overall the proposed affordable housing offer is strongly supported. The provision will, nevertheless, need to be verified as the maximum reasonable amount in accordance with London Plan Policy 3.12. To this end it is understood that an independent viability review (commissioned by Enfield Council) is currently underway. With respect to the proposed tenure split (and having had regard to the balance of the housing schedule, and the characteristics of the site and the context), GLA officers are satisfied that the proposed deviation from the strategic (60%/40%) target within London Plan Policy 3.11 is acceptable in this instance.

21 A strategic review of the proposed residential layouts confirms that the scheme would provide well-proportioned dwellings that comply with London Plan minimum space standards and respond well to the design quality benchmarks established within the Mayor's Housing SPG. The applicant has also stated the commitment to ensure that all units would meet the 'Lifetime Homes' standard and that 10% of the provision (across a range of typologies) would be wheelchair accessible/adaptable. This is supported, however, noting that new national housing standards now apply as part of Building Regulations, the Council is advised to include planning conditions to secure standards M4(2) and M4(3) as per the Mayor's proposed minor alterations to London Plan Policy 3.8.

22 In terms of children's play space, the applicant has demonstrated that the development would provide 409 sq.m. of play space on-site. Whilst this would fall 348. sq.m. short of the overall provision generated under the Mayor's Play and informal recreation SPG, it is sufficient to meet the need for on-site doorstep play for young children. The applicant proposes that older children would make use of neighbourhood play facilities at Ponders End Park (300 metres to the east). GLA officers are satisfied that this is acceptable in principle, however, the Council is invited to consider whether mitigation may be required for any associated intensification in the use of this park.

## **Urban design**

23 Following responses to GLA pre-application advice, officers are of the view that the design of this scheme responds well to the changed circumstances at the former Middlesex University site, and new role for the west of the campus in terms of accommodating an eight form Free School. Noting the town centre location, and the height of emerging developments surrounding the site, officers are satisfied that the proposed approach to height (up to seven-storeys) and massing of the scheme would provide an appropriate response to context, and would not harm the setting of the Listed college buildings to the west.

24 Whilst the location of the Free School and associated playing fields at the west of the campus present new constraints to east-west connectivity through the wider site, the proposal would successfully create a permeable and legible street based development that would be well connected to the surrounding area. The scheme would also accommodate a good mix of homes and private amenity space. In particular GLA officers welcome the proposed redevelopment of the multi-storey car park to provide block A1. This helps to provide a north-south route to Queensway of significantly higher quality than that envisaged by the previous masterplan. The approach of lining the western school playing field boundary with terraced housing is also supported, and ensures that the public realm in this area would not be flanked by extensive stretches of fencing or walls.

25 Further to advice at pre-application stage, GLA offices welcome the evolution of the proposed blocks facing High Street. With respect to block B4 (library), officers note that the applicant team has reviewed its relationship to adjacent spaces, and proposed a response that would place this block within a generous civic space. This affords the library a prominent and high quality setting on High Street, whilst refinements to the building line help to open up the eastern end of the site, and provide a good visual connection between the High Street and the Free School.

26 It is further noted that a revised treatment has been proposed to the western ground floor frontage of block B3 (which wraps a courtyard created by three blocks). The revised approach provides a rhythm of openings creating visual permeability into a shared courtyard space within this block. GLA officers are satisfied that this would be an acceptable response to the home zone street that this elevation is intended to address.

## **Inclusive access**

27 The applicant has set out its response to access and inclusion within the design and access statement. GLA officers support the commitment to ensure equal and convenient access throughout the development, and note that, in particular, the scheme presents a valuable opportunity to enhance the accessibility of the neighbourhood as well as local connections to and from the High Street. The proposed provision of a new library is a particularly welcome component of the scheme.

28 Based on the submitted drawings it is evident that the building entrances would be legible, accessible and uncluttered. Internally the blocks are well resolved - with circulation routes generously proportioned and well laid out, and typical layouts demonstrating that relevant wheelchair standards could be achieved. The landscaping details confirm that routes through the public realm would be safe and generous, and gradients would be well-handled. The use of shared surface 'home zones' at the heart of the scheme is supported in principle, however, the applicant should ensure that the detailed design of these would include tactile surface delineation, and clearly demarcated pedestrian safe zones. The submitted drawings and street cross sections indicate that this could be accommodated, however, the Council is encouraged to include a planning condition in order to secure the approval of these details.

## **Sustainable development**

### Energy strategy

29 For the purposes of assessing applications against the carbon dioxide savings target within London Plan Policy 5.2, the Mayor now applies a 35% reduction target beyond Part L 2013 of Building Regulations. In accordance with the principles of Policy 5.2 the applicant has submitted an energy statement for the proposal - setting out how the development proposes to reduce carbon dioxide emissions in accordance with the London Plan energy hierarchy. In summary, the proposed strategy comprises: energy efficiency measures (including low energy lighting and mechanical ventilation with heat recovery); and, a single energy centre prioritised for connection to the emerging Lea Valley Heat Network (and with an interim connection of phase 1 to high efficiency gas fired plant at the adjacent Free School). Overall the strategy is expected to achieve a 36% carbon dioxide saving - which would exceed the target within London Plan Policy 5.2. On the basis that the Mayor's carbon dioxide target would be met through the first to stages of the London Plan energy hierarchy, renewable technologies are not currently proposed. This is acceptable.

30 The proposed energy strategy is supported in principle. Nevertheless, GLA officers seek further information with respect to the following matters:

- Cooling: The applicant should confirm how the risk of overheating has been addressed in a way which minimises cooling demand for both residential and non-residential uses.
- District networking: With respect to the interim solution for phase 1: the applicant should confirm that there is sufficient network capacity to serve the development; and, confirm the anticipated date that the energy centre at the Free School will be operational. With respect to connection to the wider Lea Valley Heat Network: the applicant should confirm that there is sufficient network capacity to serve the development; provide estimates of installation cost and timescales for connection; and, confirm assumptions underpinning the expected carbon factor of the heat supply.

#### Climate change adaptation

31 The proposed landscaping strategy offers various opportunities for urban greening and tree planting in accordance with London Plan Policy 5.10. Such areas include amenity space for residents, as well as biodiverse roof areas. Furthermore, in conjunction with other permeable landscaping and attenuation measures, the proposed development is expected to achieve a greenfield run-off rate up to the 1 in 100 years plus climate change storm scenario. This is strongly supported in accordance with London Plan policies 5.10, 5.11 and 5.13, and the Council is encouraged to secure detailed approval of these climate change adaptation measures by way of planning condition.

### **Transport**

#### Parking

32 A provision of 98 residential car parking spaces are proposed (equivalent to a ratio of 0.58 spaces per unit). Noting the public transport accessibility level, TfL is satisfied that this provision is reasonable. However, spaces should be prioritised towards the family sized units via a car parking management plan - to be secured by planning condition. It is noted that electrical vehicle charging points (EVCPs) and Blue Badge parking for residential uses has been proposed to London Plan Standards. A further 24 parking spaces are proposed for the commercial uses. TfL is content with this subject to the inclusion of EVCPs and a minimum of three Blue Badge spaces. Notwithstanding the above, and in the interests of assessing the impact of the scheme on Ponders End High Street, TfL seeks a car parking accumulation survey. TfL seeks to avoid a situation where vehicles would queue on the highway while waiting to park at the site.

33 The proposed quantum of cycle parking (293 spaces) is appropriate for this scheme. However, to ensure that this provision would be secure, integrated and accessible (as required by London Plan Policy 6.9) the applicant should confirm the location of the residential and long stay commercial spaces, as well as whether employee shower and changing facilities are to be provided.

#### Assessing transport impacts

34 The applicant has undertaken a multi-modal transport impact assessment. Whilst this does not fully accord with TfL's best practice guidance, TfL officers are satisfied that there would not be a detrimental impact on the public transport network. The applicant has also submitted a pedestrian environment review system audit. This has identified various necessary

improvements to local bus stops and Queensway. In line with the previous scheme TfL expects these to be delivered as part of a Section 278 agreement.

#### Travel planning

35 A framework construction logistics plan, delivery and servicing plan and travel plan have been submitted and are acceptable at this stage of the planning process. TfL expects final versions to be secured by way of planning condition/planning obligation as appropriate.

### **Mayoral Community Infrastructure Levy**

36 In accordance with London Plan Policy 8.3, the Mayoral Community Infrastructure Levy (CIL) came into effect on 1 April 2012. All new development that creates 100 sq.m. or more additional floorspace are liable to pay the Mayoral CIL. The levy is charged at £20 per square metre of additional floor space in the London Borough of Enfield.

### **Local planning authority's position**

37 Enfield Council is expected to formally consider the application at a planning committee meeting in January 2016.

### **Legal considerations**

38 Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 of the Order to refuse the application, or issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application and any connected application. There is no obligation at this present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

### **Financial considerations**

39 There are no financial considerations at this stage.

### **Conclusion**

40 London Plan policies on Opportunity Areas, social infrastructure, housing, urban design, inclusive access; sustainable development; and, transport are relevant to this application. Whilst the scheme is broadly supported in strategic planning terms, the application does not yet fully comply with the London Plan as set out below. The resolution of outstanding matters may, nevertheless, lead to the application becoming compliant with the London Plan.

- **Opportunity Area:** The principle of the proposed comprehensive residential-led mixed use redevelopment is strongly supported in strategic planning terms.



- **Social infrastructure:** The proposal would allow for existing library and nursery uses to be reprovided, and provides a good mix of uses to support sustainable communities. GLA officers nevertheless seek confirmation that the services provided by the replacement community facilities could be maintained at (or above) current levels in line with London Plan Policy 3.16.
- **Housing:** The proposed housing provision within the scheme is strongly supported in accordance with London Plan Policy 3.3. The 31% provision of affordable housing, whilst supported in principle, should be verified as the maximum reasonable amount in accordance with London Plan Policy 3.12.
- **Urban design:** The design of this scheme responds well to the various contextual circumstances of its setting, and would provide a high quality intensification of this site in accordance with London Plan Policy 7.1.
- **Inclusive access:** The approach to access and inclusion is broadly supported in line with London Plan Policy 7.2. The Council is, nevertheless, encouraged to secure detailed approval of home zone/landscaping design by way of planning condition.
- **Sustainable development:** The proposed energy strategy and climate change adaptation measures are broadly supported in accordance with London Plan policies 5.2, 5.10, 5.11 and 5.13. Notwithstanding this GLA officers seek further information with respect to cooling and district networking. The Council is also encouraged to secure the details of the energy strategy and climate change adaptation measures by way of planning condition.
- **Transport:** The proposal is broadly acceptable in strategic transport terms, the applicant should, nevertheless, address the matters raised in this report with respect to parking; assessing transport impacts; and, travel planning in line with London Plan policies 6.3, 6.9, 6.13 and 6.14.

---

for further information, contact GLA Planning Unit (Development & Projects Team):

**Colin Wilson, Senior Manager – Development & Projects**

020 7983 4783 email [colin.wilson@london.gov.uk](mailto:colin.wilson@london.gov.uk)

**Justin Carr, Strategic Planning Manager (Development Decisions)**

020 7983 4895 email [justin.carr@london.gov.uk](mailto:justin.carr@london.gov.uk)

**Graham Clements, Senior Strategic Planner (case officer)**

020 7983 4265 email [graham.clements@london.gov.uk](mailto:graham.clements@london.gov.uk)

---