GREATER LONDON AUTHORITY

Planning report GLA/2024/0568 and GLA/2024/0587

2 December 2024

Selby Urban Village

Local Planning Authority: London Borough of Enfield and London Borough of Haringey

Local Planning Authority reference: 24/03470/FUL and HGY/2024/2851

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

Two planning applications for demolition of the existing building and the creation of 202 social rent homes, replacement Selby Centre and remodelling of the playing fields.

The applicant

The applicant is **The London Borough of Haringey and The Selby Centre** and the architect is **Karakusevic Carson Architects**.

Strategic issues summary

Land use principles: The redevelopment and enhancement of the social infrastructure and sports and recreational facilities on site is strongly supported.

Affordable housing: The proposal delivers 202 affordable homes (100% by habitable room), at low cost rent, which is strongly supported.

Urban design: Whilst the development doesn't meet the locational requirements of policy D9, the proposed height, massing and design of the development is supported in principle. A conclusion regarding compliance with part C of policy D9 will be made at the Mayors decision making stage.

Other issues on **transport**, **energy**, **whole life carbon** and **circular economy** also require resolution prior to the Mayor's decision making stage.

Recommendation

That the Councils be advised that the applications does not yet fully comply with the London Plan for the reasons set out in paragraph 63. Outstanding matters relating to transport, energy, whole life carbon and circular economy should be addressed.

Context

- 1. On 22 October 2024, the Mayor of London received documents from Haringey Council and on the 30th October 2024, the Mayor of London received documents from Enfield Council notifying him of two linked planning applications of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008, the Mayor must provide the Councils 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 issuing his response.
- 2. The application is referable under the following categories of the Schedule to the Order 2008:
 - 1A "Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats";
 - 3C "Development which is likely to prejudice the use as a playing field of more than 2 hectares of land which— (a) is used as a playing field at the time the relevant application for planning permission is made"
- 3. Once the Councils have resolved to determine the application, they are 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 Councils to determine the application themselves.
- 4. The Mayor of London's statement on this case will be made available on the GLA's public register: https://planapps.london.gov.uk

Site description

- 5. The site straddles the administrative boundary of the London Borough of Enfield and London Borough of Haringey. The site comprises the Selby Centre which is an existing community centre, comprising of several buildings and overground parking on the southern part of the site and the Bull Lane Playing Fields on the northern part of the site. The site extends from Bull Lane in the east to Weir Hall Road in the west.
- The area surrounding the application site is predominantly residential in character, with a school located to the west of the site and a light industrial unit adjacent to the east of the site. The Bull Lane Playing Fields are designated Open Space.
- 7. The Public Transport Accessibility Level (PTAL) is rated between 1b-3 on a scale of 0-6, and with a PTAL rating of 3 in the location of the proposed residential units.

Details of this proposal

8. The applications propose the demolition of the existing Selby Centre and the creation of 202 social rent homes, replacement Selby Centre including community uses, office, flexible uses, restaurant/café, remodelling playing fields and enhancements to the pedestrian/ cycle infrastructure.

Strategic case history

9. The GLA hosted a pre-application meeting with the applicant team (also attended by the LPAs) in July 2024 in respect of proposals to redevelop this site for 'Demolition of the existing Selby Centre and the creation of 202 social rent homes, replacement Selby Centre including community uses, office, flexible uses, restaurant/café, remodelling playing fields enhanced pedestrian/ cycle infrastructure.'

Strategic planning issues and relevant policies and guidance

- 10. For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area comprises the London Plan 2021; the Enfield Development Management document (2014); Enfield Core Strategy (2010); Haringey Local Plan: Strategic Policies (2017); and Haringey Development Management Development Plan Document (2017).
- 11. The following are also relevant material considerations:
 - The National Planning Policy Framework and National Planning Practice Guidance: and,
 - A Written Ministerial Statement, for the consultation on the revised NPPF, was issued on the 30 July 2024 by the Deputy Prime Minister and Secretary of State for Housing, Communities and Local Government. The weight to be given to this, is a matter for the decision-maker having regard to the means by which it is proposed to effect a change in policy. The draft National Planning Policy Framework was also published on 30 July 2024. However, given it is still in draft and subject to change, the weight to attach to it is limited.
 - Regulation 19 New Enfield Local Plan
 - Haringey draft Local Plan
 - Relevant strategic supplementary planning guidance (SPG) and London Plan Guidance (LPG), including on housing, affordable housing, social infrastructure, environmental and sustainability,, which can be found on the GLA's website here.¹

¹ https://www.london.gov.uk/programmes-strategies/planning/implementing-london-plan/london-planguidance?ac-63512=63507

Land use principles

Open space

- 12. The Bull Lane Playing Fields comprises 4.76ha of open space identified in the Enfield Local Plan. The proposals would redevelop the playing fields for all weather sport pitches as well has providing several buildings including a sports pavilion and the new Selby Centre to provide community uses.
- 13. The proposals would not meet the exception tests to build on designated open space within the NPPF. However, the redevelopment of the Selby Centre to provide a modern, fit-for-purpose building with community uses as its primary function as well as the delivery of 202 social rent homes and the significant enhancements to the access and sports facilities within the open space would deliver substantial benefits that would outweigh the non-compliance with London Plan Policy G4 and paragraph 103 of the NPPF.
- 14. Subject to the proposed benefits being appropriately secured, the proposed relocation of the Selby Centre and the redevelopment of the designated Open Space is supported.

Social infrastructure

- 15. The existing Selby Centre comprises 6969.9 sq.m. of multifunctional community space. The applicant has stated that the existing buildings are no longer fit for purpose. The buildings were constructed for a school and the current use has adapted to its space with issues including usable spaces not having natural light, limited and inefficient use of rooms and circulation space, poor legibility and wayfinding and an institutional character. The applicant as stated that the existing buildings also don't meet current fire safety, loading, accessibility and sustainability regulations.
- 16. The proposed development would provide a multifunctional space comprising 4073 sq.m. The applicant has worked with the Selby Centre and the stakeholders that use the space, to design a modern fit for purpose facility. The proposed building would have a variety of flexible spaces that allow for efficient programming to meet the needs of future occupiers. Whilst there would be an overall net loss of floorspace, the efficiency of the building would ensure that the capacity of the proposed Selby Centre would be greater than the existing. The proposed building would therefore function better for future occupiers and the community when compared to the existing building. The proposals would therefore deliver on the intentions of Policy S1 which supports the provision of high quality and inclusive social infrastructure.
- 17. The application states that the proposed Selby Centre will be delivered prior to the demolition of the existing centre. This is supported and should be appropriately secured.

Sports and recreation facilities

- 18. Enfield Council have stated that the existing playing fields aren't well used and don't adequately cater for sports, with the access, safety and sport infrastructure limiting the ability of the playing fields to serve the community. This is corroborated by the low level of bookings and duration of formal use over the last couple of years.
- 19. The proposals would significantly enhance the facilities for a range of sports including two junior football pitches, cricket pitch, full size 3G pitch, MUGA, boxing gym, cricket nets and associated facilities. The enhancement of the sports and recreation facilities in this location and the access to these facilities would comply with policy S5 of the London Plan, and is strongly supported.

Housing

20. The delivery of 202 homes would contribute towards the Haringey Council housing targets set out in the London Plan and is supported.

Equalities

- 21. The application has been submitted with an Equalities Impact Assessment which assesses the impact of the development on individuals and groups with protected characteristics. Overall, the assessment concludes that the proposals would result in long term positive impacts relating to accessibility, security, employment and skills for a range of groups with protected characteristics.
- 22. The assessment has identified a neutral impact on groups with protected characteristics as a result of the construction and the relocation of the existing businesses. This is based on appropriate mitigation being secured, which includes communication with these identified groups, the phased delivery of the development and a relocation strategy for existing businesses. The assessment has also identified negative impacts on all groups with protected characteristics arising during construction given the loss of the open space. Mitigation is proposed in the form of phasing the delivery and the early opening of the space and communication during the construction phase. The mitigation identified should be appropriately secured.

Affordable housing

23. The proposal intends to deliver 202 affordable homes (100% by habitable room) with a tenure split of 100% low-cost rent:

| Tenure | Total Units | Percentage (%) | Total Habitable Rooms | Percentage (%) |
|---------------|-------------|-------------------|-----------------------------|-------------------|
| Low-Cost Rent | | | | |
| Social Rent | 202 | 100 | 653 | 100 |
| Total | 202 | | 653 | |

24. The proposed development would exceed the fast-track threshold and is strongly supported. The proposed social rent units and relevant affordability criteria should be appropriately secured.

Urban design

Development layout and public realm

- 25. The proposed layout of the site is supported by officers. The Selby Centre is relocated to a central location within the site and creates a strong focal point of the development and a stronger connection with the open space.
- 26. The layout of the residential buildings and the public realm are supported. The creation of access points from Bull Lane and Weir Hall Road would improve the permeability of the site and the proposals facilitate good movement throughout the development.

Height, scale and massing

- 27. The proposal includes buildings up to 6 storeys. This constitutes a tall building according to Haringey's local definition. The site is not identified in the local plan as a site which is suitable for tall buildings. Accordingly, the proposals fail to meet the locational requirements of London Plan Policy D9 (Part B).
- 28. Notwithstanding this non-compliance, at this stage the proposal does not raise concern in regard to its impacts (outlined under Policy D9(Part C)). The proposed development would be modest in its scale and would appropriately respond to the surrounding townscape. The views provided demonstrate that the visual impact of the proposed development would be acceptable. The detailed information submitted with regard to D9(C) will also be reviewed by the Councils and any necessary local mitigation must be suitably secured as part of any planning permission. A conclusion in relation to compliance with Part C of policy D9 will be given at the Mayors decision making stage.

Internal quality

29. The applicant identifies that 95% of the proposed homes would be dual aspect. All dwellings would meet or exceed space standards. All blocks bar one would achieve a maximum of eight units accessed per core on each floor. All of the homes have access to private external amenity space. The quality of accommodation and amenity space is acceptable particularly when viewed across the development proposal as a whole.

Architectural quality

30. The development reflects the architectural language and material palette of the locality which is supported.

Fire safety

31. In line with Policy D12 of the London Plan the application is accompanied by a fire safety statement, prepared by a suitably qualified third party assessor, demonstrating how the development proposals would achieve the highest standards of fire safety, including details of construction methods and materials,

- means of escape, fire safety features and means of access for fire service personnel.
- 32. Further to the above, the proposal meets the requirements of Policy D5 within the London Plan which seeks developments incorporate safe and dignified emergency evacuation for all building users. As a result, the fire safety statement complies with London Plan Policies D12 and D5 and all proposed measures should be secured by appropriate conditions. No buildings are over 18 metres.

Inclusive design

- 33. An inclusive design statement has been included in the application submission which identifies design and mitigation measures which should be secured to achieve an inclusive environment.
- 34. The application documents confirm that 10% of the dwellings would be designed to be accessible or adaptable for wheelchair users in accordance with London Plan Policy D7. The Councils must secure M4(2) and M4(3) requirements by condition as part of any permission.

Transport

Transport assessment

- 35. A Transport assessment has been submitted with the application. However, there has not been an assessment of late evening or weekend off-peak, where it could reasonably be assumed that there would be an increase in leisure trips to the enhanced facilities. However, it is acknowledged that mitigation towards station improvements is not required. There is the opportunity to formalise bus stops instead of the existing Hail and Ride operation and Haringey and Enfield officers are encouraged to secure these improvements as part of the highway works.
- 36. The scheme design creates improved pedestrian connections within and across the site, which is welcomed, and any highway improvements for pedestrian, cycle and vehicular access will need to be secured through a Section 278 agreement.
- 37. The Transport Assessment includes an Active Travel Zone (ATZ) assessment which is welcomed. All bar one of the routes assessed are to the east, and the creation of a new connection to Weir Hall Road to the west should be complemented by improvement to local highways and public realm, and connections to Cycleway 1 to the south. Haringey and Enfield Councils are therefore encouraged to secure improvements through an appropriate mechanism.

Car parking

38. The development would include 69 parking spaces, a reduction on the existing 143 spaces and the overall quantum of parking is considered acceptable, given the intensification of the site and proposed uses in this location. It should be clarified how the following will be managed: the 60 spaces for sports field and

centre; car park charging; impacts on on-street parking; and impact residents parking. The residential element would be car free, except for 21 blue badge spaces which is supported. The proposals include the provision of 1 car club space. This is supported and should be appropriately secured along with membership. Permit free agreements for future residential occupiers should be appropriately secured. Electric Vehicle Charging Points (EVCP) will be provided in line with the London Plan. A Car Parking Management Plan is required to manage and enforce the spaces.

Cycle parking

39. The proposed cycle parking is in line with London Plan cycle parking requirements. Details of long and short stay cycle spaces should be secured by condition to ensure that cycle parking complies with London Cycling Design Standards (LCDS) guidance and London Plan Policy T5.

Travel planning, delivery and servicing and construction logistics

40. A Construction Management Plans (CMP), Delivery and Servicing Plan (DSP) and Travel Plan should be appropriately secured.

Environment and sustainable infrastructure

Energy strategy

41. The London Plan requires all major developments to meet a net-zero carbon target. Reductions in carbon emissions beyond Part L of the 2021 Building Regulations should be met on-site. Only where it is clearly demonstrated that the zero-carbon target cannot be fully achieved on-site a contribution to a carbon offset fund or reductions provided off site can be considered.

Energy strategy compliance

- 42. An energy statement has been submitted with the application. The energy statement does not yet comply with the London Plan. The applicant is required to further refine the energy strategy and submit further information to fully comply with London Plan requirements. Full details have been provided to the Councils and applicant in a technical memo that should be responded to in full; however outstanding policy requirements include:
 - Be Lean –The full SAP work sheets should be submitted for be lean, clean and green in order to verify the emissions;
 - Managing heat risk further details of natural ventilation compliance with DSY1.
 - Be Clean further detail regarding the energy mix;

Carbon savings

- 43. The domestic element is estimated to achieve a 91% reduction in CO2 emissions compared to 2021 Building Regulations. The non-domestic elements would achieve a 50% reduction.
- 44. The development falls short of the net zero-carbon target in Policy SI2, although it meets the minimum 35% reduction on site required by policy. As such, a carbon offset payment is required to be secured. This should be calculated based on a net-zero carbon target using the GLA's recommended carbon offset price (£95/tonne) or, where a local price has been set, the borough's carbon offset price. The draft s106 agreement should be submitted when available to evidence the agreement with the borough.

Whole life-cycle carbon

- 45. In accordance with London Plan Policy SI2 the applicant is required to calculate and reduce whole life-cycle carbon (WLC) emissions to fully capture the development's carbon footprint.
- 46. The applicant has submitted a whole life-cycle carbon assessment. The WLC assessment does not yet comply with London Plan Policy SI2. Further information is required on the material assumptions and all life cycle modules.
- 47. A condition should be secured requiring the applicant to submit a post-construction assessment to report on the development's actual WLC emissions. The template and suggested condition wording are available on the GLA website².

Circular economy

- 48. The London Plan requires development proposals to integrate circular economy principles as part of the design process, and referable applications must submit a Circular Economy Statement.
- 49. The applicant has submitted a Circular Economy Statement. The Circular Economy Statement does not yet comply with London Plan Policy SI7. Further information is required on design approach, Bill of materials, operational waste and recycling and reporting.
- 50. A condition should be secured requiring the applicant to submit a post-construction report. The template and suggested condition wording are available on the GLA website³.

Urban greening and biodiversity

51. The applicant has calculated that the scheme would achieve an Urban Greening Factor score of 0.448 site wide which exceeds the target score of 0.4. The

² https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-planguidance/whole-life-cycle-carbon-assessments-guidance

³ https://www.london.gov.uk/what-we-do/planning/implementing-london-plan-guidance/circular-economy-statement-guidance

- applicant should explore additional opportunities to increase the urban greening and the Councils should secure all greening measures to ensure the target is met.
- 52. The applicant has set out that there would be a biodiversity net gain of 5%. This falls short of the statutory requirement and therefore further measures to secure a biodiversity net gain should be explored and secured within any planning permission.

Sustainable drainage and flood risk

- 53. The flood risk assessment and sustainable urban drainage strategy provided generally complies with London Plan Polices SI.12 and SI.13
- 54. The proposed development does not currently meet the requirements of London Plan Policy SI.5. Additional information is required regarding water consumption of the residential and non-residential uses to demonstrate conformity.

Air quality

55. The site falls within an Air Quality Management Area. The applicant has provided an air quality assessment which concludes that the scheme would be air quality neutral and identifies that the proposed development would not require mitigation measures other than during the construction phase of the development. The Councils should identify all appropriate mitigation and appropriately secure these as part of any future planning permission. Accordingly, the development is compliant with Policy SI1.

Local planning authority's position

56. The Councils planning officers are currently assessing the application. In due course the Councils will formally consider the application at a planning committee meeting.

Legal considerations

57. 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 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

58. There are no financial considerations at this stage.

Conclusion

- 59. London Plan policies on open space, social infrastructure, housing, affordable housing, design, sustainability and the environment are relevant to this application. Whilst the proposal is supported in principle, the application does not fully comply with these policies, as summarised below:
 - Land Use Principles: The redevelopment and enhancement of the social infrastructure and sports and recreational facilities on site is strongly supported.
 - **Affordable housing:** The proposal delivers 202 affordable housing units (100% by habitable room), at low cost rent and is strongly supported.
 - **Urban design:** Whilst the development doesn't meet the locational requirements of policy D9, the proposed height, massing and design of the development is supported in principle. A conclusion regarding compliance with part C of policy D9 will be made at the Mayors decision making stage.
 - Other issues on **transport**, **energy**, **whole life carbon**, **circular economy** also require resolution prior to the Mayor's decision making stage.

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