

Jacob Gemma

From: Campbell Lee
Sent: 08 December 2020 09:25
To: Allison De Marco
Subject: FW: ARNOS GROVE - EQIA
Attachments: C20 pre-app response 191119.pdf; _HERef_PA01041401_L359783.doc

Allison – in addition to your email see below.

From: Colin Wharry <[REDACTED]ml-architects.com>
Sent: 04 December 2020 12:32
To: Campbell Lee <[REDACTED]tfl.gov.uk>; Rebecca Crow <[REDACTED]graingerplc.co.uk>; Richard Lavington <[REDACTED]ml-architects.com>; Robyn Powell-Jones <[REDACTED]ml-architects.com>
Cc: Al Eggeling (Alan Baxter) <[REDACTED]alanbaxter.co.uk>
Subject: RE: ARNOS GROVE - EQIA

Hi Lee, See attached feedback from 20thC presentation in Nov '19. They did comment on the position of the café in relation to the station, however no justification for this concern was given.

The introduction of the public square to the north of the station is perceived to be positive by the Society, however the design of this space should be revised to minimise any potential harm to the setting of the listed station. We are concerned by the proximity of the proposed single-storey retail to the north west corner of the station, and consider that this would be improved by the proposed building being set further back to give the station 'breathing' space. In our view the proposed pergola would constrain the openness of the square and creates an unnecessary statement that would compete with the station. Similarly, the introduction of trees into the proposed square needs to be very carefully planned, and our preferred option would be an alternative landscape feature that is more contained and offers less bulk at a high level to preserve views around the drum.

See also attached positive feedback from Historic England Dec '19 who supported the position of buildings and did not consider the café building to encroach on views of the station.

In respect to the design of the new buildings, we consider the proposals to be a well-considered response to the historic context of this site. We particularly note that the buildings are scaled and positioned in order to retain the primacy of the highly significant ticket hall structure in local views.

See also extract from ABA Heritage impact Assessment providing justification and support for the alignment of the café.

4.3 Impact Assessment

4.3.1 Layout of Buildings

The layout of buildings across the two sites has been designed to leave space around the main station building to maintain the building's prominence in the streetscape and allow the silhouette of the ticket hall drum against the sky to be appreciated to multiple viewpoints.

Plot A01, the southern building on Site A, has been set back away from the station, creating a public square in the location of Holden's original car park. This is a major **heritage benefit** in both preserving a significant element of Holden's original design which is illustrative of the station as a transport interchange, and in maintaining views of the ticket hall drum in key views from the west along Bowes Road. Setting Plot A01 back from the station preserves a sense of the listed drum as the primary building within the landscape. Part of Plot A01 is brought forward beyond the north-western corner of the station building. This element has been kept to a single storey to respond to the strong geometry and massing of the adjacent station's ground floor entrances. Moreover, this single-storey element will play an important role in defining the northern boundary of the open space adjacent to the station, a role currently performed by a curtilage-listed dwarf wall which is to be removed (see Section 4.3.4). Plot A02 is largely concealed in views of the station by Plot A01 and so its impact on the setting of the station is negligible.

The position of Plot B01, the southern building on Site B, has evolved to sit back from the southern boundary of the Site. Holden designed Arnos Grove with a clear boundary onto Bowes Road, with the walls extending out from the main station entrance and terminating in totems

Alice, Do you have anything to add?

Colin Wharry
Associate | Architect

MACCREANOR LAVINGTON

63 Gee Street, London EC1V 3RS
[REDACTED]

Vijverhofstraat 47, 3032 SB Rotterdam
[REDACTED]

maccreanorlavington.com

The information in this email does not necessarily represent the official policy of Maccreanor Lavington. This email is confidential and any disclosure, copying or distribution of it may be unlawful. If you have received this email in error please notify the sender immediately and delete the material from your system.

From: Campbell Lee <[REDACTED]@tfl.gov.uk>
Sent: 03 December 2020 15:24
To: Rebecca Crow <[REDACTED]@graingerplc.co.uk>; Richard Lavington <[REDACTED]@ml-architects.com>; Colin Wharry <[REDACTED]@ml-architects.com>; Robyn Powell-Jones <[REDACTED]@ml-architects.com>
Cc: Al Eggeling (Alan Baxter) <[REDACTED]@alanbaxter.co.uk>
Subject: FW: ARNOS GROVE - EQIA

Perhaps McCreanor and ABA could prepare a response – I recall we discussed this issue during the application prep.

Lee

From: Allison De Marco <[REDACTED]@enfield.gov.uk>
Sent: 03 December 2020 14:58
To: Campbell Lee <[REDACTED]@tfl.gov.uk>
Cc: Matthew Sharpe <[REDACTED]@quod.com>; Rebecca Crow <[REDACTED]@graingerplc.co.uk>; Brown Mary <[REDACTED]@tfl.gov.uk>; Andy Higham <[REDACTED]@enfield.gov.uk>; Quinton-Navarro Daniel <[REDACTED]@tfl.gov.uk>
Subject: RE: ARNOS GROVE - EQIA

Thank you Lee. If Matt or Rebecca could please respond in respect of making the EqIA public that would be helpful.

While emailing we have received the attached objection from the 20th Century Society. Their objection focuses on concerns about the proximity of the proposed single-storey element of Block A01 to the north west corner of the station. There are also some minor comments about planting placement / management.

I have contacted the caseworker to ask if she is able to discuss. Please let me know if you or anyone in your team want to join – otherwise I will meet with Coco and provide an update following our discussion.

Kind regards,
Allison

Allison De Marco MRTPI
Planning Decisions Manager – Strategic Applications
Planning Service
Place Department
Enfield Council

E: [REDACTED]@enfield.gov.uk

W: www.enfield.gov.uk

From: Campbell Lee <[REDACTED]@tfl.gov.uk>
Sent: 02 December 2020 09:14
To: Allison De Marco <[REDACTED]@enfield.gov.uk>
Cc: Matthew Sharpe <[REDACTED]@quod.com>; Rebecca Crow <[REDACTED]@graingerplc.co.uk>; Brown Mary <[REDACTED]@tfl.gov.uk>; Andy Higham <[REDACTED]@enfield.gov.uk>; Quinton-Navarro Daniel <[REDACTED]@tfl.gov.uk>
Subject: RE: ARNOS GROVE - EQIA

Rebecca/Matt – do you have a view from a CLL/Planning perspective?

Generally TfL are working towards publishing all its EQIA's on a central public webpage and our D&I have stated they are happy for this to be made public – so from a TfL pov I am fine.

Lee

From: Allison De Marco <[REDACTED]@enfield.gov.uk>
Sent: 01 December 2020 18:35
To: Campbell Lee <[REDACTED]@tfl.gov.uk>
Cc: Matthew Sharpe <[REDACTED]@quod.com>; Rebecca Crow <[REDACTED]@graingerplc.co.uk>; Brown Mary <[REDACTED]@tfl.gov.uk>; Andy Higham <[REDACTED]@enfield.gov.uk>
Subject: RE: ARNOS GROVE - EQIA

Thank you Lee.

I agree an EqIA is not a validation requirement but thank you for sharing a copy of TfL's EqIA in this case.

It would be helpful if TfL could please confirm if the EqIA has been submitted as a supporting document – to be uploaded to the planning register as a public document? The document does not appear to contain any 'confidential' markings, so do TfL confirm it can be uploaded as a supporting document? Although not a validation requirement, it is not unusual for Equality Impact Statements to be submitted in support of strategic and/or complex major planning applications.

Kind regards,
Allison

Allison De Marco MRTPI
Planning Decisions Manager – Strategic Applications
Planning Service
Place Department
Enfield Council

E: [REDACTED]@enfield.gov.uk
W: www.enfield.gov.uk

From: Campbell Lee <[REDACTED]@tfl.gov.uk>
Sent: 30 November 2020 17:06
To: Allison De Marco <[REDACTED]@enfield.gov.uk>
Cc: Matthew Sharpe <[REDACTED]@quod.com>; Rebecca Crow <[REDACTED]@graingerplc.co.uk>; Brown Mary <[REDACTED]@tfl.gov.uk>; Andy Higham <[REDACTED]@enfield.gov.uk>
Subject: ARNOS GROVE - EQIA

Hi Allison

As far as we are aware the Enfield local validation checklist does not require an EqIA for applications such as Arnos Grove. The scope and content of the Arnos Grove application was also agreed pursuant to the Planning Performance Agreement, which did not require a EqIA to be prepared.

However TfL, as a public sector body, had in any event undertaken an assessment in as part of its duty under the Equality Act 2010. The Act forms the basis of anti-discrimination law in Great Britain. Section 149 of the Act requires public authorities to have due regard to equality considerations when exercising their functions.

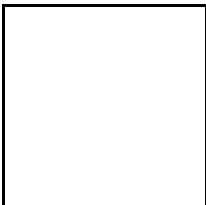
The Act does not specifically require an Equality Impact Assessment nor define how it should be carried out. The PSED is to have “due regard” to the requirements of the Act.

As requested by you, TfL is sharing the EQIA prepared in consultation with its own internal Diversity and Inclusion Team in respect of the Arnos Grove project. It is worth nothing that TfL considers EQIA’s as live documents which will evolve and be added to as projects progress – we therefore anticipate that this document will evolve.

Please let me know if you require anything further.

Kind regards

Lee



[Follow us on Facebook](#) [Twitter](#) www.enfield.gov.uk

Enfield Council is committed to serving the whole borough fairly, delivering excellent services and building strong communities. Opinions expressed in this email are those of the individual and not necessarily those of the London Borough of Enfield. This email and any attachments or files transmitted with it are strictly confidential and intended solely for the named addressee. It may contain privileged and confidential information and if you are not the intended recipient and receive it in error you must not copy, distribute or use the communication in any other way. All traffic handled by the Government Connect Secure Extranet may be subject to recording/and or monitoring in accordance with relevant legislation.

This email has been scanned for viruses but we cannot guarantee that it will be free of viruses or malware. The recipient should perform their own virus checks.

Disclaimer

The information contained in this communication from the sender is confidential. It is intended solely for use by the recipient and others authorized to receive it. If you are not the recipient, you are hereby notified that any disclosure, copying, distribution or taking action in relation of the contents of this information is strictly prohibited and may be unlawful.

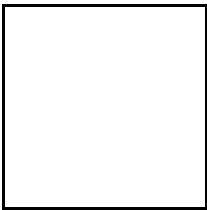
This email has been scanned for viruses and malware, and may have been automatically archived by **Mimecast Ltd**, an innovator in Software as a Service (SaaS) for business. Providing a **safer** and **more useful** place for your human generated data. Specializing in; Security, archiving and compliance. To find out more [Click Here](#).

The contents of this e-mail and any attached files are confidential. If you have received this email in error, please notify us immediately at postmaster@tfl.gov.uk and remove it from your system. If received in error,

please do not use, disseminate, forward, print or copy this email or its content. Transport for London excludes any warranty and any liability as to the quality or accuracy of the contents of this email and any attached files.

Transport for London is a statutory corporation whose principal office is at 5 Endeavour Square, London, E20 1JN. Further information about Transport for London's subsidiary companies can be found on the following link: <http://www.tfl.gov.uk/corporate/about-tfl/>

Although TfL have scanned this email (including attachments) for viruses, recipients are advised to carry out their own virus check before opening any attachments, as TfL accepts no liability for any loss, or damage which may be caused by viruses.



[Follow us on Facebook](#) [Twitter](#) www.enfield.gov.uk

Enfield Council is committed to serving the whole borough fairly, delivering excellent services and building strong communities. Opinions expressed in this email are those of the individual and not necessarily those of the London Borough of Enfield. This email and any attachments or files transmitted with it are strictly confidential and intended solely for the named addressee. It may contain privileged and confidential information and if you are not the intended recipient and receive it in error you must not copy, distribute or use the communication in any other way. All traffic handled by the Government Connect Secure Extranet may be subject to recording/and or monitoring in accordance with relevant legislation.

This email has been scanned for viruses but we cannot guarantee that it will be free of viruses or malware. The recipient should perform their own virus checks.

Jacob Gemma

From: Allison De Marco <[REDACTED]@enfield.gov.uk>
Sent: 01 December 2020 18:35
To: Campbell Lee
Cc: Matthew Sharpe; Rebecca Crow; Brown Mary; Andy Higham
Subject: RE: ARNOS GROVE - EQIA

Thank you Lee.

I agree an EqIA is not a validation requirement but thank you for sharing a copy of TfL's EqIA in this case.

It would be helpful if TfL could please confirm if the EqIA has been submitted as a supporting document – to be uploaded to the planning register as a public document? The document does not appear to contain any 'confidential' markings, so do TfL confirm it can be uploaded as a supporting document? Although not a validation requirement, it is not unusual for Equality Impact Statements to be submitted in support of strategic and/or complex major planning applications.

Kind regards,
Allison

Allison De Marco MRTPI
Planning Decisions Manager – Strategic Applications
Planning Service
Place Department
Enfield Council

E: [REDACTED]@enfield.gov.uk
W: www.enfield.gov.uk

From: Campbell Lee <[REDACTED]@tfl.gov.uk>
Sent: 30 November 2020 17:06
To: Allison De Marco <[REDACTED]@enfield.gov.uk>
Cc: Matthew Sharpe <[REDACTED]@quod.com>; Rebecca Crow <[REDACTED]@graingerplc.co.uk>; Brown Mary <[REDACTED]@tfl.gov.uk>; Andy Higham <[REDACTED]@enfield.gov.uk>
Subject: ARNOS GROVE - EQIA

Hi Allison

As far as we are aware the Enfield local validation checklist does not require an EqIA for applications such as Arnos Grove. The scope and content of the Arnos Grove application was also agreed pursuant to the Planning Performance Agreement, which did not require a EqIA to be prepared.

However TfL, as a public sector body, had in any event undertaken an assessment in as part of its duty under the Equality Act 2010. The Act forms the basis of anti-discrimination law in Great Britain. Section 149 of the Act requires public authorities to have due regard to equality considerations when exercising their functions.

The Act does not specifically require an Equality Impact Assessment nor define how it should be carried out. The PSED is to have "due regard" to the requirements of the Act.

As requested by you, TfL is sharing the EQIA prepared in consultation with its own internal Diversity and Inclusion Team in respect of the Arnos Grove project. It is worth nothing that TfL considers EQIA's as live documents which will evolve and be added to as projects progress – we therefore anticipate that this document will evolve.

Please let me know if you require anything further.

Kind regards

Lee



[Follow us on Facebook](#) [Twitter](#) www.enfield.gov.uk

Enfield Council is committed to serving the whole borough fairly, delivering excellent services and building strong communities. Opinions expressed in this email are those of the individual and not necessarily those of the London Borough of Enfield. This email and any attachments or files transmitted with it are strictly confidential and intended solely for the named addressee. It may contain privileged and confidential information and if you are not the intended recipient and receive it in error you must not copy, distribute or use the communication in any other way. All traffic handled by the Government Connect Secure Extranet may be subject to recording/and or monitoring in accordance with relevant legislation.

This email has been scanned for viruses but we cannot guarantee that it will be free of viruses or malware. The recipient should perform their own virus checks.

Disclaimer

The information contained in this communication from the sender is confidential. It is intended solely for use by the recipient and others authorized to receive it. If you are not the recipient, you are hereby notified that any disclosure, copying, distribution or taking action in relation of the contents of this information is strictly prohibited and may be unlawful.

This email has been scanned for viruses and malware, and may have been automatically archived by **Mimecast Ltd**, an innovator in Software as a Service (SaaS) for business. Providing a **safer** and **more useful** place for your human generated data. Specializing in; Security, archiving and compliance. To find out more [Click Here](#).

Jacob Gemma

From: Campbell Lee
Sent: 03 December 2020 16:25
To: Allison De Marco
Cc: Matthew Sharpe; Rebecca Crow; Andy Higham
Subject: RE: ARNOS GROVE - EQIA

Alison

Thanks for this. It is probably sensible that one or two of us attend given previous correspondence and engagement with 20th Century Society. The objection relates to a very specific point which I recall was discussed and considered in detail by the design team during the pre-app stage so we can make sure we are prepared to talk through design choices and justification as well as our heritage position.

Best

Lee

From: Allison De Marco <[REDACTED]@enfield.gov.uk>
Sent: 03 December 2020 14:58
To: Campbell Lee <[REDACTED]@tfl.gov.uk>
Cc: Matthew Sharpe <[REDACTED]@quod.com>; Rebecca Crow <[REDACTED]@graingerplc.co.uk>; Brown Mary <[REDACTED]@tfl.gov.uk>; Andy Higham <[REDACTED]@enfield.gov.uk>; Quinton-Navarro Daniel <[REDACTED]@tfl.gov.uk>
Subject: RE: ARNOS GROVE - EQIA

Thank you Lee. If Matt or Rebecca could please respond in respect of making the EqIA public that would be helpful.

While emailing we have received the attached objection from the 20th Century Society. Their objection focuses on concerns about the proximity of the proposed single-storey element of Block A01 to the north west corner of the station. There are also some minor comments about planting placement / management.

I have contacted the caseworker to ask if she is able to discuss. Please let me know if you or anyone in your team want to join – otherwise I will meet with Coco and provide an update following our discussion.

Kind regards,
Allison

Allison De Marco MRTPI
Planning Decisions Manager – Strategic Applications
Planning Service
Place Department
Enfield Council

E: [\[REDACTED\]@enfield.gov.uk](mailto:[REDACTED]@enfield.gov.uk)
W: www.enfield.gov.uk

From: Campbell Lee <[REDACTED]@tfl.gov.uk>
Sent: 02 December 2020 09:14
To: Allison De Marco <[REDACTED]@enfield.gov.uk>
Cc: Matthew Sharpe <[REDACTED]@quod.com>; Rebecca Crow <[REDACTED]@graingerplc.co.uk>; Brown Mary <[REDACTED]@tfl.gov.uk>; Andy Higham <[REDACTED]@enfield.gov.uk>; Quinton-Navarro Daniel

<[REDACTED]@tfl.gov.uk>
Subject: RE: ARNOS GROVE - EQIA

Rebecca/Matt – do you have a view from a CLL/Planning perspective?

Generally TfL are working towards publishing all its EQIA's on a central public webpage and our D&I have stated they are happy for this to be made public – so from a TfL pov I am fine.

Lee

From: Allison De Marco <[REDACTED]@enfield.gov.uk>
Sent: 01 December 2020 18:35
To: Campbell Lee <[REDACTED]@tfl.gov.uk>
Cc: Matthew Sharpe <[REDACTED]@quod.com>; Rebecca Crow <[REDACTED]@graingerplc.co.uk>; Brown Mary <[REDACTED]@tfl.gov.uk>; Andy Higham <[REDACTED]@enfield.gov.uk>
Subject: RE: ARNOS GROVE - EQIA

Thank you Lee.

I agree an EqIA is not a validation requirement but thank you for sharing a copy of TfL's EqIA in this case.

It would be helpful if TfL could please confirm if the EqIA has been submitted as a supporting document – to be uploaded to the planning register as a public document? The document does not appear to contain any 'confidential' markings, so do TfL confirm it can be uploaded as a supporting document? Although not a validation requirement, it is not unusual for Equality Impact Statements to be submitted in support of strategic and/or complex major planning applications.

Kind regards,
Allison

Allison De Marco MRTPI
Planning Decisions Manager – Strategic Applications
Planning Service
Place Department
Enfield Council

E: [REDACTED]@enfield.gov.uk
W: www.enfield.gov.uk

From: Campbell Lee <[REDACTED]@tfl.gov.uk>
Sent: 30 November 2020 17:06
To: Allison De Marco <[REDACTED]@enfield.gov.uk>
Cc: Matthew Sharpe <[REDACTED]@quod.com>; Rebecca Crow <[REDACTED]@graingerplc.co.uk>; Brown Mary <[REDACTED]@tfl.gov.uk>; Andy Higham <[REDACTED]@enfield.gov.uk>
Subject: ARNOS GROVE - EQIA

Hi Allison

As far as we are aware the Enfield local validation checklist does not require an EqIA for applications such as Arnos Grove. The scope and content of the Arnos Grove application was also agreed pursuant to the Planning Performance Agreement, which did not require a EqIA to be prepared.

However TfL, as a public sector body, had in any event undertaken an assessment in as part of its duty under the Equality Act 2010. The Act forms the basis of anti-discrimination law in Great Britain. Section 149 of the Act requires public authorities to have due regard to equality considerations when exercising their functions.

The Act does not specifically require an Equality Impact Assessment nor define how it should be carried out. The PSED is to have “due regard” to the requirements of the Act.

As requested by you, TfL is sharing the EQIA prepared in consultation with its own internal Diversity and Inclusion Team in respect of the Arnos Grove project. It is worth noting that TfL considers EQIA's as live documents which will evolve and be added to as projects progress – we therefore anticipate that this document will evolve.

Please let me know if you require anything further.

Kind regards

Lee



[Follow us on Facebook](#) [Twitter](#) www.enfield.gov.uk

Enfield Council is committed to serving the whole borough fairly, delivering excellent services and building strong communities. Opinions expressed in this email are those of the individual and not necessarily those of the London Borough of Enfield. This email and any attachments or files transmitted with it are strictly confidential and intended solely for the named addressee. It may contain privileged and confidential information and if you are not the intended recipient and receive it in error you must not copy, distribute or use the communication in any other way. All traffic handled by the Government Connect Secure Extranet may be subject to recording/and or monitoring in accordance with relevant legislation.

This email has been scanned for viruses but we cannot guarantee that it will be free of viruses or malware. The recipient should perform their own virus checks.

Disclaimer

The information contained in this communication from the sender is confidential. It is intended solely for use by the recipient and others authorized to receive it. If you are not the recipient, you are hereby notified that any disclosure, copying, distribution or taking action in relation of the contents of this information is strictly prohibited and may be unlawful.

This email has been scanned for viruses and malware, and may have been automatically archived by **Mimecast Ltd**, an innovator in Software as a Service (SaaS) for business. Providing a **safer** and **more useful** place for your human generated data. Specializing in; Security, archiving and compliance. To find out more [Click Here](#).

The contents of this e-mail and any attached files are confidential. If you have received this email in error, please notify us immediately at postmaster@tfl.gov.uk and remove it from your system. If received in error, please do not use, disseminate, forward, print or copy this email or its content. Transport for London excludes any warranty and any liability as to the quality or accuracy of the contents of this email and any attached files.

Transport for London is a statutory corporation whose principal office is at 5 Endeavour Square, London, E20 1JN. Further information about Transport for London's subsidiary companies can be found on the following link: <http://www.tfl.gov.uk/corporate/about-tfl/>

Although TfL have scanned this email (including attachments) for viruses, recipients are advised to carry out their own virus check before opening any attachments, as TfL accepts no liability for any loss, or damage which may be caused by viruses.



[Follow us on Facebook](#) [Twitter](#) www.enfield.gov.uk

Enfield Council is committed to serving the whole borough fairly, delivering excellent services and building strong communities. Opinions expressed in this email are those of the individual and not necessarily those of the London Borough of Enfield. This email and any attachments or files transmitted with it are strictly confidential and intended solely for the named addressee. It may contain privileged and confidential information and if you are not the intended recipient and receive it in error you must not copy, distribute or use the communication in any other way. All traffic handled by the Government Connect Secure Extranet may be subject to recording/and or monitoring in accordance with relevant legislation.

This email has been scanned for viruses but we cannot guarantee that it will be free of viruses or malware. The recipient should perform their own virus checks.



Ms Alice Eggeling
Alan Baxter Ltd
75 Cowcross Street
London
EC1M 6EL

Direct Dial: [REDACTED]

Our ref: PA01041401

11 December 2019

Dear Ms Eggeling

Pre-application Advice

ARNOS GROVE UNDERGROUND STATION CAR PARK

Thank you for arranging our meeting last week to discuss the emerging proposals for the development of the east and west car parks adjacent to Arnos Grove Station. Our advice is set out below.

Significance

The development sites are located directly to the east and west of Arnos Grove Station, which is a grade II* listed building. The station is one of a collection of stations designed by Charles Holden and his team as part of the 1930s extension of the Piccadilly Line. These stations are all designed in a modern European style and have distinctive brick and concrete street facades with steel windows. Arnos Grove is particularly distinctive due to the design of its main ticket hall, which comprises a square single storey base with a tall circular structure over, which has a distinctive and iconic silhouette that is seen as a stand-alone element in many views. The main station building is flanked by low brick walls with artificial stone copings that serve to define the front forecourt areas. Associated features include railings, sign totems and original concrete lamp posts with modern light fittings, which are also mentioned in the listing description and are considered to be significant features of the station design.

Impact

The proposed development comprises the erection of two buildings on the eastern car park that would range from between 3 and 6 storeys in height and for a further two buildings on the western car park that would range from between 4 and 7 storeys in height.

The proposals also include relandscaping of the forecourt area to the west of the station to provide a new landscaped public open space and a number of accessible parking spaces. This work potentially involves the removal of sections of the listed boundary walls and railings, as well as the repositioning of the concrete lamp posts.

Policy



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone 020 7973 3700
HistoricEngland.org.uk



Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any information held by the organisation can be requested for release under this legislation.

We respect your privacy and the use of your information. Please read our full privacy policy for more information
<https://www.historicengland.org.uk/terms/privacy-cookies/>

Sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended) set out the obligation on local planning authorities to pay special regard to safeguarding the special interest of listed buildings and their settings.

The National Planning Policy Framework guides our decision making on how to safeguard this special interest.

Paragraph 127 states that planning policies and decisions should ensure that developments function well and add to the overall quality of an area; are visually attractive as a result of good architecture, layout and appropriate and effective landscaping; and are sympathetic to local character and history, including the surrounding landscape setting.

Paragraph 189 states that in determining applications, local authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution to their setting. Paragraph 193 states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. Paragraph 194 states that any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting.

Position

Historic England welcomes the opportunity to comment on these proposals at pre-application stage.

In respect to the design of the new buildings, we consider the proposals to be a well-considered response to the historic context of this site. We particularly note that the buildings are scaled and positioned in order to retain the primacy of the highly significant ticket hall structure in local views.

In relation to the proposed works to the forecourt area to the west of the station, Historic England is a key consultee in any forthcoming applications for listed building consent for works affecting the listed structures in this area and will need to recommend authorisation to the Secretary of State prior to the approval. Whilst we do not have any objection to the principle of the proposals, we would recommend further pre-application discussions in relation to the following works, which have yet to be developed in detail:

works to the concrete lamp posts;
works to the walls and railings on the north and south sides of the forecourt,
including possible reuse of the railings;



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone 020 7973 3700
HistoricEngland.org.uk



Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any information held by the organisation can be requested for release under this legislation.

We respect your privacy and the use of your information. Please read our full privacy policy for more information <https://www.historicengland.org.uk/terms/privacy-cookies/>



works to the wall on the west side of the forecourt. If this wall is proposed to be removed and relocated, evidence will need to be provided showing that this work can be undertaken reusing existing fabric and will result in a like for like appearance; proposed landscaping design. We would recommend that the proposals include a palette of high quality finishes. We would also recommend that the proposed pergola is reconsidered, as this structure appears incongruous with the overall design of the forecourt area.

Next Steps

Thank you for involving us at this stage of pre-application discussions. As set out above, the proposals are still evolving and are subject to further discussion. We would welcome the opportunity to continue discussions through our Extended Pre-applications service, details of which can be found on our website at www.HistoricEngland.org.uk/EAS. If you would like to discuss this option further, please do contact me.

Yours sincerely



Claire Brady
Inspector of Historic Buildings and Areas
E-mail: [\[REDACTED\]@HistoricEngland.org.uk](mailto: [REDACTED]@HistoricEngland.org.uk)

CC

Bridget Pereira, London Borough of Enfield
Harriet Bell, London Borough of Enfield

ARNOS GROVE UNDERGROUND STATION CAR PARK Pre-application Advice

Information Provided

Document received at site meeting entitled 'Arnos Grove Historic England Site Walk 4 December 2019' by Maccreanor Lavington



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone 020 7973 3700
HistoricEngland.org.uk





Evie Learman
Principal Planning Officer
Enfield Council
Silver St
London EN1 3XA

Sent by email: [REDACTED]@enfield.gov.uk

01 December 2020

Our ref: 19 11 02

Dear Evie Learman

20/01188/LBC and 20/01049/FUL - Arnos Grove Station, Bowes Road, London, N11 1AN

The Twentieth Century Society writes to object to the proposed residential development adjacent to Arnos Grove Underground Station. The Society was involved in pre-application consultations in October 2019 and the proposals were presented to the Society's Casework Committee on Monday 11 November 2019. We apologise that this letter is late and hope you will still consider our thoughts on the application.

Background

Arnos Grove is an Underground Station designed by Charles Holden as part of the eastern extension of the Piccadilly Line carried out during the 1930s. Arnos Grove was built in 1932 and is now listed at Grade II*. Multiple sources state that Holden's Piccadilly line stations were influenced by modern buildings he visited on an architectural tour of Northern Europe and Scandinavia in 1930. Arnos Grove bears a particular resemblance to Stockholm's Central Library by Gunnar Asplund that was opened in 1928.

It is generally accepted that Arnos Grove was Holden's best Piccadilly Line extension station in design terms, as well as being the architect's personal favourite. The building's list description states that the extension stations "were of great importance for introducing rational modern design based on continental models to a wider public and for imposing a brand image to buildings and design when this was still novel." Gavin Stamp, writing in Architectural Design's double issue 'Britain in the Thirties' (Vol 49 No.19-11, 1979), stated that Holden's stations from this period "are an elegant and rational development of tradition in response to modern conditions." Stamp also reflected on the connection between Arnos Grove and Ledoux's Barriere de la Villette in Paris (1784-87), "which in its suburban location it resembles symbolically". Holden's Piccadilly line extension stations share a language of utilitarian materials and exposed structural elements, generally using bold forms, radiant light and prominent signage to serve as landmarks.

Policy

The NPPF (2019) states the following in relation to developments that affect designated heritage assets:

When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be) (paragraph 193)

Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification (paragraph 194)

Comments

In pre-application consultations, the Society welcomed the general principle of developing surface car parks to provide new housing and recognised the efforts made by TfL and the design team to understand and protect the listed station's historic significance within the scope of this development.

We are pleased the pergola has been removed from the new scheme, as we believed this would constrain the openness of the square and create an unnecessary statement that would compete with the station.

However, the Society remains concerned about the proximity of the proposed single-storey retail building to the north west corner of the station, and consider that this would be improved by the proposed building being set further back to give the station 'breathing' space.

We also ask that the trees in the proposed square are carefully positioned and maintained to preserve views around the station's drum.

In light of the closeness of the new single-storey build, the Society recommends that the Local Authority rejects the application.

I hope that these comments are of use to you. Please do not hesitate to contact me if you have any further queries.

Yours sincerely,



Coco Whittaker

Caseworker

Twentieth Century Society

Remit: The Twentieth Century Society was founded in 1979 and is the national amenity society concerned with the protection, appreciation, and study of post-1914 architecture, townscape and design. The Society is acknowledged in national planning guidance as the key organisation concerned with the modern period and is a constituent member of the Joint Committee of the National Amenity Societies. Under the procedures set out in *ODPM Circular 09/2005*, all English local planning authorities must inform the Twentieth Century Society when an application for listed building consent involving partial or total demolition is received, and they must notify us of the decisions taken on these applications.

The Twentieth Century Society

70 Cowcross Street, London EC1M 6EJ

[c20society.org.uk](https://www.c20society.org.uk)

www.c20society.org.uk

F1457 A1 Equality Impact Assessment (EqIA) form

N.B: the completed form should be emailed to the [Diversity and Inclusion team](#)

Project * Programme Strategy Policy*	Arnos Grove Station Car Park Development Connected Living London - Build to Rent Portfolio
---	---

Accountable	Job Title*	Name
	Development Manager for Arnos Grove Signature	Lee Campbell Date

Produced By	Job Title	Name
	Project Management Apprentice Signature	Rebecca Marsh Date

Reviewed By	Job Title	Name
	Mary Bather Planning Manager for Arnos Grove Signature	Date
	Job Title Lead for D&I	Name Frances McAndrew
	FE McAndrew Signature	23-7-20 Date

Document History	Version	Date	Summary of changes
	1.0	13/11/2019	Programme Template Draft
	2.0	05/12/2019	First Comments – Internal BTR
	3.0	17//01/2020	RM Response to Superuser.
	4.0	23/01/2020	RM Second Response to Superuser.
	5.0	23/01/2020	RM Final Draft
	6.0	24/01/2020	RM Response to FM
	7.0	07/04/2020	MB Review of RM&FM Responses

* Delete as appropriate (the Accountable person should always be at least one management level higher than the Responsible person).

Printed copies of this document are uncontrolled.

Page 1 of 41

To be used in conjunction with: G1060



Project Related Documents	Doc No.	Document title	Relevant Section(s) of this Document



Step 1: Clarifying Aims

Q1. Outline the aims/objectives/scope of this piece of work

Strategic Context

Transport for London is one of the capital's largest landowners, with a 5,700-acre estate that has enormous potential to help deliver the much-needed new homes and jobs London needs. Tfl's land holdings have the potential to play a vital role in meeting the Mayor's priorities to build new and affordable homes.

CONNECTED LIVING
LONDON

TRANSPORT FOR LONDON | MAYOR OF LONDON | grainger plc

Connected Living

Connected Living is a long-term partnership between Transport for London (TfL) and Grainger plc, the UK's largest provider of private rental homes. The joint venture will deliver thousands of homes across London, contributing to Mayoral and GLA targets for housing development in the capital. The homes, regardless of tenure, will be good quality homes and it is the partnership's intention to deliver these at pace across an initial 7 sites, boosting the number of new homes available in London while also generating significant ongoing revenue for TfL to reinvest into the transport network.



- We will deliver around 3,000 homes with the potential for more.
- We will deliver 40% affordable housing across the Connected Living portfolio.
- We will generate vital revenue to reinvest in the transport network.
- We will provide transport infrastructure improvements including step-free access, new bus stations and better public realm.
- We will create healthy streets and neighbourhoods where people want to live.

A fundamental attribute of the homes that Connected Living will deliver is that they will benefit from excellent transport links, which we will build on by promoting healthy streets, whilst also maximising opportunities to walk, cycle and use public transport.

With 20% of all UK households currently renting, the demand for rental homes is growing at a rapid pace. The demographic of the typical renter is also changing – the average age of a private renter in the UK is 40 years old and people this age are now almost twice as likely to be renting from a private landlord than they were 10 years ago.

Many people can't afford to buy but others enjoy the flexibility of renting. Despite this, the quality of the capital's rental homes is often poor, with unfair tenancy terms. It is the partnership's desire for Connected Living to be London's landlord of choice, providing excellent service in a place where our customers feel secure and call 'home'.

Affordable and Accessible Homes

TfL is committed to delivering 50 per cent affordable homes across our London-wide portfolio of sites. In contributing towards these targets, Connected Living's Build to Rent sites will provide 40% affordable housing. ,

Across the Connected Living Build to Rent portfolio, we expect that we will be delivering a mixture of affordable housing products including Discount Market Rent (DMR). DMR will include rent at London Living Rent levels and, in some cases, London Affordable Rent.

The Mayor has published benchmark London Living Rent levels for every neighbourhood in the capital. These are based on a third of average local household incomes and adjusted for the number of bedrooms in each home. London living Rents are only available to those who are eligible, including having a household income of below £60,000 and are based on target rent levels towards which social rents are gradually being raised. They are comparative to Social Rents, and significantly lower than the "Affordable Rents" which can be as much as 80% of private rental rates.

A private renter in the UK spends on average 34% of their salary on rent and our rent levels will be in line or lower than this rate.

More information on GLA London Living Rents can be found at:

<https://www.london.gov.uk/what-we-do/housing-and-land/improving-private-rented-sector/london-living-rent>

The Development includes 10% of units as wheelchair accessible (M4(3)) and 90% as wheelchair adaptable (M4(2)) as required by Draft London Plan Policy D7. The design is inclusive and accessible, with consideration for the diverse population, facilitating social interaction and inclusion (Policy D5, London Plan).

Boosting Housing Supply

London desperately needs more homes and this partnership will allow us to deliver thousands of Build to Rent homes at pace. We are committed to meeting the demand for good quality rental homes and helping the Mayor improve life for London's private renters.

Security of Tenure and Tenure Blind

Residents will be offered long term agreements of up to five years with an automatic right to renew. Should personal circumstances change, residents will also have the flexibility to move within the existing building or across our wider portfolio, so they can continue to enjoy the benefits of Connected Living.

All our residents, regardless of tenure, will be able to access the same amenities and facilities. They will also receive the same management and service standards across the mixed community. The affordable housing provision will be located throughout the developments and will be agreed with the local borough on a site by site basis.

Quality, Well Managed Homes

Build to Rent homes are purpose built with the specific needs of renters in mind, improving the overall quality of housing stock in the private rented sector. Through single ownership and dedicated management, Build to Rent can ensure a commitment to and investment in the place-making of sites, and is able to provide professional services, including on-site management and maintenance support. We'll be looking to provide



our customers with what they need and want – from the security and convenience of an onsite management team to high speed Wi-Fi, shared work space and a gym.

Design Legacy

We will maintain ownership and control of our developments in the long-term, which will be exemplar developments that will promote and showcase what can be achieved through public-private partnership. We are passionate about design and our homes will be good quality, well designed, safe, secure and sustainable buildings for the future. We will work with the local communities to create places and neighbourhoods where people can work, live and play.

Sustainability

As a long-term property developer and owner, we are deeply invested in the long-term quality of the communities we build. Our business model is focused on designing, developing, investing in, and managing quality homes which enrich the lives of residents. Through our projects, we will drive social impact, promote economic development, and exemplify a philosophy of environmental stewardship – not only because it's the right thing to do, but because doing so can drive commercial value.

Transport Investment

This partnership will enable us to generate vital long-term income to reinvest into the capital's transport network, supporting 31 million journeys every day and helping deliver one of the world's largest capital investment programmes.

Economic Growth

Our homes will support London's economy by providing the type of homes demanded by the city's workforce, including those who work in front line services and key workers. Many of our sites will also provide a range of uses including retail units, community venues and work space, supporting hundreds of jobs for local people across London. We will be working with colleges, charities and construction employers across London to help provide local job opportunities and work experience on our sites, helping to plug the skills gap in the construction sector and provide fantastic development opportunities. We are also actively targeting hard to reach groups, such as women, people from BAME background, and ex-offenders, who are currently under represented in the industry.

Scope of the Scheme

Arnos Grove Underground Station is situated in the London Borough of Enfield, in the Southgate Green Ward. It was opened on 19 September 1932 as part of the northern extension of the Piccadilly Line from Finsbury Park. Since then, the station has become a key landmark for the local area. The station was granted Grade II listed status in 1971 which was upgraded to Grade II* in 2011 to reflect the building's status as an icon of British Modernist architecture.

Enfield is about 12 miles by road from the centre of London. Five train lines pass through the borough, including the Piccadilly (Underground) Line connecting to Heathrow Airport. The other direct connections are in to London Kings Cross, Moorgate and Liverpool Street, outward to Welwyn Garden City, Hertford North, Hertford East, Letchworth and Stevenage, making Enfield a well-connected borough both from outside, and travelling into London.

Around 40% of Enfield is designated Green Belt, making development in the area challenging. It is one of the least densely populated areas of London as a result. Our emerging proposals are seeking to deliver a Build to Rent development on the existing station car park land, making the most of valuable brownfield land within the borough. The development will comprise of 162 new homes, with 40% affordable housing and a flexible unit (86.2sqm) comprising Use Class C3/A1/A3.

A new, attractive station square will be created to the western station entrance, providing a new, public space with level access, ensuring it is accessible to all. It will be available for anyone to use and will create a more open space, providing a pedestrianised area for people to congregate, or safely travel through. The scheme is accompanied by a comprehensive Landscaping Strategy which comprises external amenity space including areas accessible to the public including the public square, and private shared amenity providing spaces to sit and relax and play space. The private areas will be enclosed by vegetation and characterised by living environments that are safe and inviting and prioritise people over vehicles. The proposed planting has been selected to increase the ecological connectivity and protect biodiversity by providing communal gardens and play space with a focus on retaining existing mature trees and planted boundaries.

Site Map



Parking

The current car park at Arnos Grove has 297 general purpose car parking spaces, 10 LUL staff parking spaces and 6 dedicated blue badge spaces. Surveys on their current utilisation have shown 4 of these blue badge spaces to be in use during peak hours on both a Saturday and a Thursday.

We are proposing a full closure of this car park, replacing it with a car free development, with the exception of:

- 6 publicly accessible blue badge car parking spaces re-provided near their current location at the front of the site.
- 5 additional blue badge parking spaces for residents (3%), with the capacity to increase this to 11 should demand from residents increase in the future (10%) in line with policy requirements.
- Up to ten spaces re-provided on site for station staff – to support the efficient running of the transport network.

Whilst we are providing an equivalent blue badge parking, it should be noted that the station does not currently have step-free access. A feasibility study has been undertaken by the step-free access team. Our works will ensure they do not impede any future decisions to provide step-free access, however there are no current plans to do so at Arnos Grove Station.

How does this scheme deliver the Portfolio aims?

This scheme aligns with Draft London Plan and the Mayor's Transport Strategy, allowing highly accessible, public sector land to be put to better use enabling much needed new and affordable homes to be delivered in the Borough of Enfield. We will be making use of otherwise constrained pieces of land, utilising brownfield sites to minimise impacts on green spaces, maintaining biodiversity and the health benefits which they provide.

01 REDEVELOPMENT & CONSTRUCTION BENEFITS



c. 250 jobs over the duration of the construction period



Construction training opportunities and apprenticeships



10% biodiversity net gain
 Removal of the car park allowing new habitat creation



Reducing 400-750 daily vehicle trips from local roads

02 BUILD TO RENT BENEFITS



Housing security
 - fair terms for tenants with a choice of 1-5 year agreements



Transparent rents
 - fixed and capped rent increases during tenancies



Meeting local needs
 - providing an affordable, quality alternative to buying



Placemaking
 - long term investment in placemaking

A cycle friendly neighbourhood and car free development encourages more sustainable and healthy travel choices in line with the Healthy Streets Strategy. This focusses on improving people's health and quality of life with better air quality, more active travel, green spaces and road safety improvements. ¹ Being ideally located next to Arnos Grove station provides vital links, removing the need for travelling by car and encouraging active travel methods such as walking and cycling along with sustained use of public transport. Paired with the removal of the existing parking this will help to significantly reduce the number of vehicle trips generated by this site, having a positive impact on local traffic issues including air quality and congestion.

We will be providing jobs and training opportunities during the construction phase of the project, which, along with our Community Infrastructure Levy² will help to support the local economy, providing local services and plugging skills shortages in the construction industry.

Enfield Council also have their own Housing Strategy to tackle issues such as homelessness, overcrowding, and homes for those with specific needs, low incomes and older people. Our scheme in Arnos Grove will contribute towards these targets to provide long term, sustainable, rented homes for those who need them.³

¹ <https://healthystreets.com/>

<http://content.tfl.gov.uk/healthy-streets-for-london.pdf>

² <https://www.gov.uk/guidance/community-infrastructure-levy>

³ <https://new.enfield.gov.uk/services/housing/housing---strategy---housing-strategy-2012-2027.pdf>

03 FINANCIAL BENEFITS



c. £1.7m

in Community Infrastructure Levy - 15% of which could be spent on local priorities



£2.1m per year additional household spending, which can benefit local shops and services



£1.1m

New Homes Bonus Payments (total payments over a 4 year period)



£240k per year in council tax payments

04 COMMUNITY BENEFITS



c.150 new homes in a sustainable location



Increasing housing affordability with 40% of homes at Discount Market Rent



A new public square providing space to sit, meet & socialise next to the station



Reducing the number of cars on the roads will help promote healthier streets

Q2. Does the Build to Rent programme impact on staff or customers?

Yes. The Build to Rent programme and projects delivered under this programme will have an impact on both staff and customers.

How does the Build to Rent programme impacts staff or customers?

Staff

Development and delivery of the schemes within the Build to Rent programme will involve TfL staff, either permanent or contracted. Some schemes will also involve staff from London boroughs or contracted services.

As the Arnos Grove scheme is on station premises, station staff may be impacted temporarily due to the changes in parking, access or accommodation provisions. There are currently 10 staff parking spaces and we will work with the station staff during construction to ensure adequate facilities are in place.

Customers Including Residents

Impacts on Travel

A range of customers will be impacted by the schemes within the Build to Rent programme both during and after construction. These include impacts to travel choices and changes to traffic flows due to construction traffic and diversions. These impacts will be temporary during the delivery of the scheme, while positive impacts are expected following completion, including decreased traffic and improvements in the public realm for pedestrians. Public realm changes will also help to improve safety and the feeling of safety in the area, which is a barrier to travel for protected groups such as Women, BAME and LGB Londoners.

The biggest impacts are likely to be felt by those regularly travelling to and from the area, particularly those who travel by car, while the biggest benefits are likely to be felt by those who live in or close to the scheme.

Impacts to Parking

As the Arnos Grove scheme is making use of the station car park, impacts may be felt most by those who regularly park there. Our transport consultants have conducted research on the utilisation of the car parks and we have found that 33% of all car-park users are within walking distance of an underground station, and 50% within walking distance of a national rail station. This is based on the Public Transport Accessibility Level (PTAL) Assessment which recommends walking distances of 960m for rail and underground stations, and 640m for bus stops.

A further 68% of car-park users are within walking distance of a bus route that serves Arnos Grove station. 99% of users are within 960m away from a station or 640m away from a bus stop serving Arnos Grove. This research demonstrates that most users have alternative means of travel available to them and are not prevented from travelling on the network due to the changes. The car-park closure will also positively affect customers who travel to the station by walking or cycling due to reduced traffic flow and an improved public space in-front of the station.

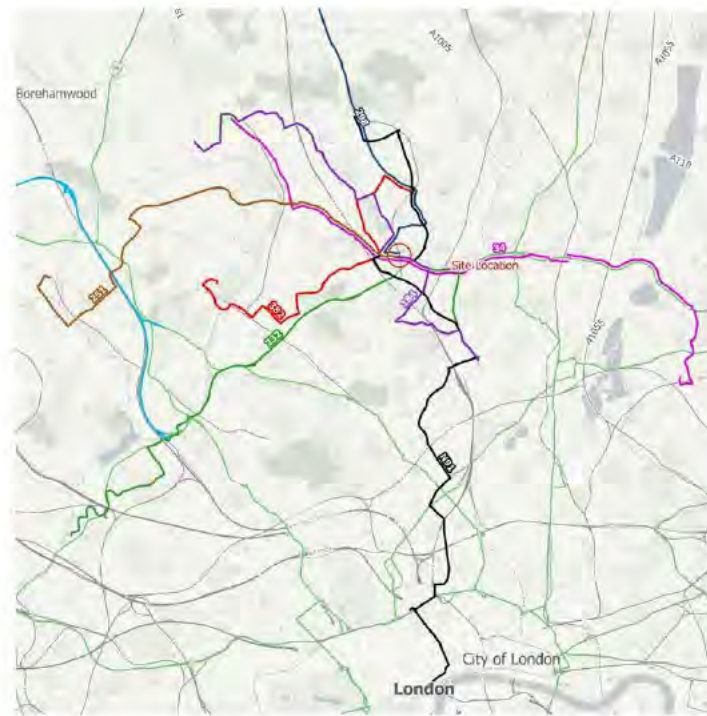
Impacts to Housing Stock

Enfield's Draft Housing Strategy (2019) states that people aged 65% and over make up over 13% of the population and that that figure is forecast to increase by 23% by 2025.

As required by both Enfield and GLA policy, the scheme comprises an inclusive and accessible design with consideration for the diverse population, facilitating social interaction and inclusion (London Plan Intend to Publish, Policy D5). In line with the Draft London Plan requirements, 10% of dwellings meet Building Regulation requirement M4(3) 'wheelchair user dwellings' and the remainder are M4(2)

'accessible and adaptable dwellings' (London Plan Intend to Publish, Policy D7 and Enfield Core Policy 4), which means that all homes provided by the scheme have the flexibility to meet the needs of their tenants.

The new public square and wider public realm has been designed to improve circulation and accessibility. Blue badge station car parking has been provided close to the station entrance to minimise walking or transfer distances and bays are provided on level ground of less than 1:50 as required by Building Regulations. Dropped kerbs will aid accessibility for all users.



Existing Bus Routes (Source: Transport Survey – Consultants: Pell Frischmann)

Impacts to Economic Growth

We will be creating jobs locally including apprenticeships to help plug skills gaps in the construction industry, and provide work for underrepresented groups such as BAME, women and ex-offenders. Long term benefits will be felt by those hired. Additionally, there will be a benefit to local amenities because of the Community Infrastructure Levy (CIL) payment, and the increased council taxes generated by the scheme. These funds will go directly towards improving local services. Due to the car free nature of the development, residents are also more likely to utilise local amenities and services on a day to day basis, contributing towards an increased footfall in local businesses and supporting the local economy.

Significant positive benefits will be felt by Connected Living London residents, who will have access to high quality, affordable homes that are well connected to central London.

Impacts to Protected Characteristics

There are however some people with barriers to travel due to age, impairments or other factors, who may have their journeys impacted more significantly by the changes. This may be due to them being less able to use alternative means of transport, or frequency of travel using local services. Issues such as the availability of blue badge spaces have been considered to prevent or minimise the impacts on

certain groups, along with maintaining pedestrian safety and accessibility to the station throughout construction. Blue badge spaces will be provided by the development (3%) with a commitment to monitor and increase provision by a further 7% (10% overall), should the demand arise.

Specific impacts for each protected characteristic group are explored in detail Step 3



Step 2: The Evidence Base

Q3. Record here the data you have gathered about the diversity of the people potentially impacted by this work. You should also include any research on the issues affecting inclusion in relation to your work

Evidence Base:⁴

According to the office of national statistics, Enfield has an estimated population of 333,869, of which Southgate Green Ward comprises 14,231.

Measure	Southgate Green	Enfield	Source
Population Estimate (2018)	14,231	333,869	ONS mid-year estimates 2018
Children aged 0-15	2,587	76,366	ONS mid-year estimates 2018
Working-age people (16-64)	9,287	213,600	ONS mid-year estimates 2018
Older people aged 65+	2,357	43,903	ONS mid-year estimates 2018
% All Children aged 0-15	18.2	22.9	ONS mid-year estimates 2018
% All Working-age (16-64)	65.3	64.0	ONS mid-year estimates 2018
% All Older people aged 65+	16.6	13.1	ONS mid-year estimates 2018
% BAME - 2018	32.6	36.8	Enfield Council Estimates 2018
% BAME - 2011	33.1	39.0	Census 2011
% Not Born in UK - 2011	36.2	35.1	Census 2011
% English is First Language of no one in household - 2011	14.0	14.1	Census 2011
Area - Square Kilometres	2.6	82.2	Ministry for Housing, Communities and Local Government
Population density (people per sq km)	5,399	4,047	ONS mid-year estimates 2018 / MHCLG

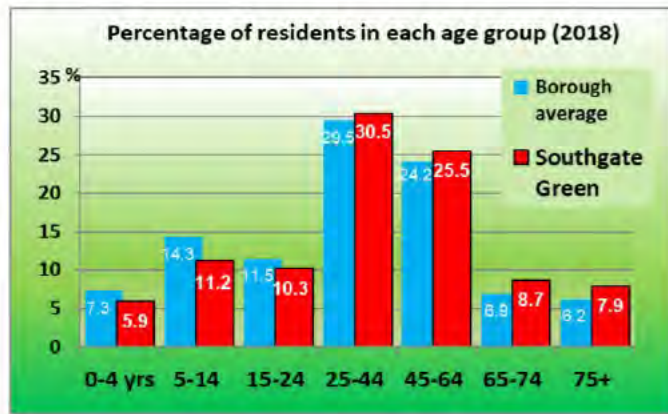
<https://new.enfield.gov.uk/services/your-council/borough-and-wards-profiles/about-enfield-information-southgate-green.pdf>

Age

As shown by the age profile, Southgate Green has a higher number of older people and a lower number of younger people when compared to the borough average.

- Almost all younger Londoners aged under 25, walk at least once a week in London (99%).
- 45% of school journeys are made on foot and walking is more common amongst those aged between 5 and 10 (54%), than those aged between 11 and 15, (31%).
- Barriers to transport use that older people face on our streets are particularly physical barriers

Age Profile



⁴ <http://content.tfl.gov.uk/travel-in-london-understanding-our-diverse-communities-2019.pdf>
http://source.tfl/pdfs/Action_on_Equality_2016.pdf
<https://new.enfield.gov.uk/services/your-council/census-and-socio-economic-information/about-enfield-information-2011-census-ethnicity-language-faith-country-of-origin.pdf>
<https://governance.enfield.gov.uk/documents/s77276/Homelessness%20in%20Enfield%20Final.pdf>
<https://new.enfield.gov.uk/services/housing/housing---strategy---housing-strategy-2012-2027.pdf>
<https://new.enfield.gov.uk/services/planning/enfield-town-masterplan-parking-strategy-planning.pdf>



e.g. long distances to bus stops and presence of steps.

- Younger Londoners aged between 16 and 24-years-old are significantly more likely to feel worried about their personal security when travelling by public transport in the Capital. 35% of younger Londoners are worried about their personal security, compared with 30% of all Londoners. Younger Londoners are also more likely to have experienced a specific worrying incident on public transport in the past three months (40% compared with 32% of all Londoners).

Improvements to the public realm, including the reduction of traffic, will significantly benefit younger people, particularly walking to school during peak hours.

Disability

- 14% of Londoners and 15% of Enfield residents consider themselves to have a disability that impacts their day to day activities 'a lot' or 'a little'.
- The most commonly used types of transport by disabled Londoners are walking (78% walk at least once a week), the bus (56%) and car as a passenger (47%)
- Disabled Londoners are less satisfied with streets and pavements in London than non-disabled Londoners (51% compared to 71%) with 65% considering the condition of pavements to be a barrier to walking and 43% reporting that obstacles on pavements are a barrier to walking more.

Removal of parking will be a significant impact to those who are less able to travel by other means. Improvements to the public realm should benefit the large group of disabled people who walk as part of their journeys, by removing barriers to travel.

Gender

- Concerns around crime and antisocial behaviour also have an impact upon women's frequency of public transport use: 61% report that the frequency with which they travel is affected 'a lot' or 'a little' because of these concerns, compared with 43% of men. Women (of all ages) are also less likely to use un-booked minicabs, with 13% claiming they are likely to do so in future compared to 26% of men. Women are more likely than men to experience episodes of worry when travelling on public transport and this is more likely to reduce their frequency of travel than for men.
- Londoners living in a lower income household (less than £20,000 per year) and older Londoners (aged 65 or over) are more likely to be women. This will mean women will experience more positive or negative impacts, due to degrees of intersectionality with other protected groups.
- Women are more likely than men to be travelling with buggies and/or shopping, and this can affect transport choices, particularly as their concerns about safety are higher.
- The employment rate of women is affected by child dependency. Employment rates (noted in 2010) decline steadily from 78% of women with no dependent children to 22% of women with four or more dependent children, indicating that women are still the primary carers of children. These family commitments also change the way in which women use public transport, affecting their travel patterns and behaviour.

Our proposed improvements to the public realm and issues such as anti-social behaviour, should benefit women who feel worried when travelling. The reduction of traffic in the area will benefit women travelling with buggies or small children, particularly during school runs or peak hours.

Race

- Proportion of White: English/Welsh/Scottish/Northern Irish/British residents in Enfield is 40.5%, below the London average of 44.9%. This is a decrease from 61.2% in 2001. The next highest groups are Other White (18.2%) and Black African (9.0%). A large proportion of residents (Over

- 30%) therefore belong to other, small demographics including BAME groups.
- 35.1% of residents were born outside of the UK with the two largest countries after England being Turkey (4.5%) and Poland (1.9%). The remainder is made up of many, small demographics, showing that Enfield has a multicultural population.
 - BAME Londoners, both adults and children, are twice as likely as white Londoners to be injured on the roads. BAME Londoners are also less likely than white Londoners to say that they feel safe from road accidents when walking around London at night (60% BAME compared with 74% white).
 - The age structure of BAME Londoners tends to be younger than white Londoners, and it is estimated that, by 2031, more than half of London's 15 to 19 year olds will belong to a BAME group and the proportion of all Londoners from a BAME ethnic group will reach 51% by 2041.

BAME residents will be positively affected by the reduction of traffic, owing to the removal of the car-parks. Additionally, as those on lower incomes are more likely to be BAME, they may experience a higher than average benefit from the affordable housing provision.

Religion or Belief

According to the 2011 Census; Christianity (in all forms) is the most common religion in the borough at 53.58%. 16.69% of residents are of the Muslim faith, and 15.53% hold no religion or belief at all. However as shown by the 2017 Annual Population Survey by the ONS, Enfield has high proportions in all the main non-Christian religions except Sikh, compared to national averages. Compared to the London average, Enfield has both a large Muslim population (15.2%) and a slightly larger Christian population (51.3%), compared to the London average of (14.3%) and (46.4%) respectively.

Due to degrees on intersectionality, those from faith backgrounds tend to frequently fall within BAME groups, meaning they may experience more impacts than other members of the population.

It is difficult to identify how faith directly impacts peoples' travel behaviours, however due to the proximity of several places of worship to the Arnos Grove site, it can be assumed that some impacts will be felt.

Other – refugees, low income, homeless people⁵

Households on lower incomes tend to live in more deprived areas and experience higher rates of crime as a result.⁶

City Hall has published new analysis confirming a strong link between serious youth violence and Londoners affected by deprivation, poor mental health and poverty. The new figures show that three-quarters of the boroughs in London with the highest levels of violent offending are also in the top 10 most deprived, while the same boroughs also have higher proportions of children under 20 living in poverty than the London average.

Barriers to Travel

Concerns about antisocial behaviour and crime are also frequently mentioned as barriers to public transport use by Londoners living in D-E households (semi- and un-skilled manual workers, state pensioners, casual/lowest grade workers and unemployed Londoners) of whom 41% say that concerns about antisocial behaviour affect their travel frequency.

⁵ <https://new.enfield.gov.uk/services/housing/housing---strategy---housing-strategy-2012-2027.pdf>

⁶ <https://www.civitas.org.uk/content/files/povertyandcrime.pdf>



Our scheme provides affordable housing which is safe and secure, with well lit, open public realm areas. This will have a significant positive impact on those on lower incomes who are more likely to live in deprived areas and particularly in poor quality, private sector accommodation. The development will also be well connected, with short, safe routes to and from the station. The improved public realm space will be designed to discourage anti-social behaviour.

Housing

- There has been very substantial growth in the number of households in the private rented sector – up 103% in 10 years – higher than the national growth rate and far higher than across London. More than a fifth of all households in Enfield were in the private rented sector in 2011. There is a demonstrative need for rental products in the area, particularly those which are affordable and of a high quality.
- Owner occupation, including shared ownership, has declined from 70.7% at 2001 to 58.8% at 2011, with affordability contributing significantly to this decrease. Private landlords have subsequently boosted the private rented sector from 11.9% to 22.2%. The relative increase in the number of private renting households (103%) was the third highest in London.
- Enfield have identified a lack of affordable private sector housing in the borough, including for those who can afford more than social rent but not market rent levels or sale prices. The Build to Rent portfolio primarily targets these middle earners and will help to fill this gap in the market. As we will be prioritising existing residents of the borough rather than bringing in new residents the development should have a positive effect on affordability in the area by freeing up other properties elsewhere in Enfield, both for sale and for rent.
- Enfield's Draft Housing Strategy (2019) states that people aged 65% and over make up over 13% of the population and that that figure is forecast to increase by 23% by 2025. The numbers of people with learning disabilities is set to increase to more than 1,100 people who will require health, care and support services by 2020.

Homelessness

- Data suggests that Enfield faces a specific challenge of homelessness that comes from residents in the private rental sector, this may be due in part to higher rates of poorer households in the Private sector.
- Enfield has a high number of households who are made homeless after the loss of an assured shorthold tenancy, particularly in the private rental sector. According to the Live Tables on Homelessness⁷, as a proportion of homelessness cases it totalled 40% of cases, the second highest in absolute terms. 48% of cases were from the end of a private tenancy. (Smith Institute, June 2019)⁸
- Additionally, around a quarter of Enfield households claim housing benefit versus around 15% across England.

The Arnos Grove scheme will help to address homelessness issues by providing affordable properties to those in the local area. All residents will be offered tenancy agreements of up to five years, on fair rental terms with reviews set out at the point of signing the tenancy agreement, providing security of tenure. Should personal circumstances change, residents will also have the flexibility to move within the existing building or across the wider portfolio of CLL sites. They will however be flexible, allowing

⁷ <https://www.gov.uk/government/statistical-data-sets/live-tables-on-homelessness>

⁸ <https://governance.enfield.gov.uk/documents/s78340/Homelessness%20in%20Enfield%20Final.pdf>



tenants to end their contracts if their circumstances change. This will also include moving within the CLL portfolio, whether this is to another scheme, or moving into an affordable tenure in the same building. This will prevent residents from experiencing loss of tenancy due to unforeseen events and provide flexibility while allowing people to stay in their established communities within the schemes. We will be prioritising existing borough residents for tenancies which will further help to free up other properties for sale and rent across the borough.

Child Poverty

- Enfield has a very high proportion of households that contain dependent children – the 5th highest in England & Wales. Enfield is in a similarly poor position for household overcrowding, as measured against accepted standards for room requirements it was 22nd worst in England and Wales in 2011.

Enfield has the 12th highest level in England for workless households with dependent children and the 6th highest in London. The schemes affordable offering will consist of largely 2 and 3 bedroom properties, allowing families to benefit from affordable homes which are fit for purpose and above the minimum space requirements. Additionally the shared amenity spaces will further aid overcrowding, while providing a safe and secure space in which to raise children.

It is also important to note that Londoners living in lower income households (below £20,000) are more likely to be: Women (55% compared with 50% all Londoners), BAME people (44% compared with 37% all Londoners), Older people (24% are aged over 65, whereas people in this age group make up 13% of the total London population), Disabled people (20% compared with 9% all Londoners). Impacts on those on lower incomes may therefore disproportionately effect these groups.

Sexual orientation

- There is little difference between the barriers identified by LGBT+ and all Londoners, however degrees of intersectionality may result in LGBT+ people experiencing barriers due to other factors.
- LGBT+ Londoners are slightly less likely to say they are worried about their personal security when using public transport in London, (26% compared to 31% for heterosexual Londoners) however they are significantly more likely than heterosexual Londoners to have experienced incidents of unwanted sexual behaviour or hate crime while travelling on the Capital's public transport network. Unwanted sexual behaviour has been reported at 16% for LGBT+ Londoners, versus 10% for all heterosexual Londoners, and 14% for women.
- Fears of intimidation and/or abuse are sometimes mentioned by LGBT+ Londoners as barriers for increased public transport use.

Information about the local community

A review of local businesses, amenities and services has been undertaken to find out if any groups with protected characteristics are likely to be more present. This includes the presence of nearby schools / nurseries, community centres, religious buildings, medical centres, hospitals, care homes etc. Where these are in proximity to the scheme, consideration of users with protected characteristics are taken account.

Some sites of consideration include:

Places of worship:

Our Lady of Lourdes Church

Nanak Darbar North London
Palmers Green & Southgate United Synagogue
Also,
Saint Paul's Church, New Southgate
New Southgate & Friern Barnet Christ Church
Assembly Hall of Jehovah's Witnesses
Sisters of Our Lady of the Missions

Schools:

Our Lady of Lourdes Catholic Primary School
Highview Pre-School
Broomfield School
Garfield Primary

Community Centres

22nd Southgate Scout Group

Businesses:

The project team has visited each of the businesses along Bowes Road to inform them of the proposals and invite them to the public consultations. While we did not collect any formal feedback at this time, generally there was a positive response about how the increased footfall would positively impact the businesses.

We do not have any formal data on the owners of the businesses to identify if they will be affected specifically due to protected characteristics.

Residential Homes:

Rosedale Residential Home on The Limes Avenue, between New Southgate and Arnos Grove.

Design guidance / standards

All units in Connected Living London Schemes will be built in alignment with the Draft London Plan Policies⁹ as well as national standards such as The Building Regulations 2010.¹⁰

These regulations can only ensure that all our schemes are fit for purpose and accessible when implemented by those with sufficient expertise and when done alongside engagement with those impacted e.g. disabled and older people.

⁹ <https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/draft-london-plan-consolidated-suggested-changes-version-july-2019>

¹⁰

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/540330/BR_PDF_AD_M1_2015_with_2016_amendments_V3.pdf



Step 3: Impact

Q4. Given the evidence listed in step 2, consider and describe what potential short, medium and longer term negative impacts this work could have on people related to their protected characteristics?

Consider evidence in relation to all relevant protected characteristics;

- Age
- Disability including carers¹¹
- Gender
- Gender reassignment
- Marriage/civil partnership
- Other – refugees, low income, homeless people
- Pregnancy/maternity
- Race
- Religion or belief
- Sexual orientation

Potential Impact/Considerations for protected characteristic/Locations identified.)

Protected Characteristic	Explain the potential negative impact																									
<p>Age</p> <p>Southgate Green Ward has an older population than the Borough Average.</p> <table border="1" style="width: 100%; border-collapse: collapse; text-align: center;"> <thead> <tr> <th></th> <th>Enfield</th> <th>Southgate Green</th> </tr> </thead> <tbody> <tr> <td>0-4</td> <td>7.8%</td> <td>5.9</td> </tr> <tr> <td>5-14</td> <td>13.2%</td> <td>11.2</td> </tr> <tr> <td>15-24</td> <td>13.5%</td> <td>10.3</td> </tr> <tr> <td>25-44</td> <td>30.4%</td> <td>30.5</td> </tr> <tr> <td>45-64</td> <td>22.6%</td> <td>25.5</td> </tr> <tr> <td>65-74</td> <td>6.5%</td> <td>8.7</td> </tr> <tr> <td>75+</td> <td>5.9%</td> <td>7.9</td> </tr> </tbody> </table>		Enfield	Southgate Green	0-4	7.8%	5.9	5-14	13.2%	11.2	15-24	13.5%	10.3	25-44	30.4%	30.5	45-64	22.6%	25.5	65-74	6.5%	8.7	75+	5.9%	7.9	During Construction:	
		Enfield	Southgate Green																							
0-4	7.8%	5.9																								
5-14	13.2%	11.2																								
15-24	13.5%	10.3																								
25-44	30.4%	30.5																								
45-64	22.6%	25.5																								
65-74	6.5%	8.7																								
75+	5.9%	7.9																								
Y	<p>Pedestrian diversions - During construction, diversions for pedestrians may be required. There may be some negative impacts due to increased or diverted walking routes for temporary periods of time. This may be felt more so by older or younger people who may find walking for longer distances more difficult or who may be less comfortable navigating streets where the surroundings are unfamiliar. Older people are also more likely to experience some form of impairment which can affect their travel.</p> <p>Locations affected: Bowes Road</p>																									
Y	<p>Construction Traffic – An increase in heavy goods and other construction traffic may impact those who regularly travel near the site. This could particularly impact younger people who are more likely to walk, especially to and from school. There are several primary schools near the station so many walking journeys may be made in peak hours and therefore impacted.</p> <p>Locations affected: Bowes Road</p>																									

¹¹ Including those with physical, mental and hidden impairments as well as carers who provide unpaid care for a friend or family member who due to illness, disability, or a mental health issue cannot cope without their support



	Y	<p>Blue Badge Parking – As the scheme closes the car parks, this may have an impact upon older people who rely on private vehicles to access local services and amenities.</p> <p>The 6 publicly accessible blue badge spaces currently at Arnos Grove will be retained where possible during construction and will be re-provided in the new development. There may however be changes to the availability or location of blue badge parking during construction, which would cause temporary disruption for older people who are more likely to experience some form of disability, and therefore rely on blue badge spaces.</p> <p>A car parking survey was undertaken on Thursday 10th October and Saturday 12th October 2019. The peak occupancy of the blue badge bays was 4 spaces on both days. This indicates there will be limited disruption during the construction period as the spaces are not currently occupied at full capacity</p> <p>Locations affected: Arnos Grove Station</p>
	Y	<p>Parking – As the scheme closes the car parks this may have an impact upon older people who rely more on private vehicles to access local services and amenities.</p> <p>Due to the total removal of parking, there may be a particular impact for older people who do not qualify for blue badges, but still find walking longer distances or navigating public transport more difficult.</p> <p>Locations affected: Arnos Grove Station</p>
		<p>Post Construction</p>
	Y	<p>Blue Badge Parking – As the scheme closes the car parks this may have an impact upon older people who rely on private vehicles to access local services and amenities. Additionally, older people are more likely to experience some form of disability and therefore rely on blue badge spaces.</p> <p>A car parking survey was undertaken on Thursday 10th October and Saturday 12th October 2019. The peak occupancy of the blue badge bays was 4 spaces on both days. This indicates there will be limited disruption</p>



	<p>during the construction period as the spaces are not currently occupied at full capacity. Additionally, there is no intention to remove existing blue badge spaces currently on site; these are to be reprovided by the scheme.</p> <p>Locations affected: Arnos Grove Station</p>		
	<p>Y Parking – As the scheme closes the car parks, this may have an impact upon older people who rely more on private vehicles to access local services and amenities.</p> <p>Due to the total removal of parking, there may be a particular impact for older people who do not qualify for blue badges, but still find walking longer distances or navigating public transport more difficult.</p> <p>Locations affected: Arnos Grove Station</p>		
	<p>Y Anti-Social Behaviour – Where residents can no longer arrive by car, there may be an impact on the safety, or perception of safety for younger travellers, who are more likely to feel worried about safety while travelling on public transport.</p> <p>Locations affected: Arnos Grove Station</p>		
<p>Disability Including Carers</p> <p>Based on the 2011 Census, London has a disabled population of 15.4%.</p> <table border="1" data-bbox="225 1373 592 1568"> <tr> <td>% of Disabled people in Enfield</td> <td>15%</td> </tr> </table>	% of Disabled people in Enfield	15%	<p>During Construction:</p> <p>There is a risk that the development may not be accessible unless a National Register of Access Consultants (NRAC) accredited access auditor is involved in the development of the scheme as well as individuals with disabilities who will be able to comment on the practicalities of living and moving around the site.</p> <p>Y Pedestrian diversions - During construction, diversions for pedestrians may be required. There may be some negative impacts due to increased or diverted walking routes for temporary periods of time. This may be felt more so by disabled people who may find walking for longer distances more difficult or who may be less comfortable navigating streets where the surroundings are unfamiliar.</p> <p>Locations affected: Bowes Road and immediate area</p> <p>Blue Badge Parking – As the scheme closes the car parks this may have an impact upon disabled people who rely</p>
% of Disabled people in Enfield	15%		



	<p>on private vehicles to access local services and amenities.</p> <p>The 6 publicly accessible blue badge spaces currently at Arnos Grove will be retained where possible during construction and will be re-provided in the new development. There may however be changes to the availability or location of blue badge parking during construction, which would cause temporary disruption for older people who are more likely to experience some form of disability, and therefore rely on blue badge spaces.</p> <p>A car parking survey was undertaken on Thursday 10th October and Saturday 12th October 2019. The peak occupancy of the blue badge bays was 4 spaces on both days. This indicates there will be limited disruption during the construction period as the spaces are not currently occupied at full capacity</p> <p>Locations affected: Arnos Grove Station</p>						
	<p>Post Construction:</p>						
	<p>Y Blue Badge Parking – As the scheme closes the car parks this may have an impact upon disabled people who rely on private vehicles to access local services and amenities.</p> <p>The 6 publicly accessible blue badge spaces currently at Arnos Grove will be re-provided in the new development.</p> <p>A car parking survey was undertaken on Thursday 10th October and Saturday 12th October 2019. The peak occupancy of the blue badge bays was 4 spaces on both days. This indicates there will be limited disruption during the construction period as the spaces are not currently occupied at full capacity.</p> <p>Locations affected: Arnos Grove Station</p>						
<p>Gender</p> <table border="1" data-bbox="188 1825 574 2033"> <tr> <td></td> <td>Enfield</td> <td>Southgate Green</td> </tr> <tr> <td>Male</td> <td>48.2%</td> <td>50.1%</td> </tr> </table>		Enfield	Southgate Green	Male	48.2%	50.1%	<p>During Construction:</p> <p>Y Pedestrian Diversions - During construction, diversions for pedestrians may be required. There may be some negative impacts due to increased or diverted walking routes for temporary periods of time. Research indicates women are still the primary carers of children, therefore</p>
	Enfield	Southgate Green					
Male	48.2%	50.1%					



<table border="1" data-bbox="193 197 571 297"> <tr> <td>Female</td> <td>51.8%</td> <td>49.8%</td> </tr> </table>	Female	51.8%	49.8%		<p>this may be felt more by women carrying infants, taking children to school, who may find walking for longer distances more difficult.</p> <p>Locations affected: Arnos Grove Station, Bowes Road.</p>
Female	51.8%	49.8%			
		<p>Post Construction:</p>			
	Y	<p>Anti-Social Behaviour – Where residents or visitors can no longer arrive by car, there may be an impact, or a perceived impact on safety. This would have a more significant impact on women who are more likely to change their travel plans due to concerns over safety.</p> <p>Locations affected: Entire Scheme</p>			
	Y	<p>Parking and Access – As women are more likely to be travelling with buggies and children, using public transport can be more difficult. There may therefore be more of an impact on women due to the removal of parking at the station.</p> <p>Locations affected: Arnos Grove Station</p>			
<p>Gender reassignment</p> <table border="1" data-bbox="220 1227 596 1350"> <tr> <td>% Gender Reassignment</td> <td>Unknown</td> </tr> </table> <p>(The Gender Identity Research and Education Society (GIREs) estimates that in the UK around 1% of the population, are estimated to experience some degree of gender non-conformity, however it is impossible to say whether Enfield is higher or lower than the national figure.¹²)</p>	% Gender Reassignment	Unknown	Y	<p>Safety / feeling of safety - Fears of intimidation and/or abuse are sometimes mentioned by LGBT Londoners as barriers for increased public transport use. LGBT Londoners may therefore experience lower perception of personal safety as a result. This may be negatively impacted by the removal of car parking, requiring people to travel by other means.</p> <p>Locations Affected – Arnos Grove Station</p>	
% Gender Reassignment	Unknown				

¹² <https://new.enfield.gov.uk/services/your-council/borough-and-wards-profiles/borough-profile-2019-your-council.pdf>



<p>Marriage/civil partnership</p> <table border="1" data-bbox="193 309 544 499"> <tr> <td data-bbox="193 309 371 499">% of Married / Civil Partnerships</td> <td data-bbox="371 309 544 499">Unknown</td> </tr> </table>	% of Married / Civil Partnerships	Unknown	N	<p>We do not anticipate the site works to negatively impact persons because of their Marriage or Civil Partnership status.</p> <p>Impacts will however be monitored on completion of the scheme.</p>
% of Married / Civil Partnerships	Unknown			
<p>Other – e.g. refugees, low income, homeless people</p> <p>According to official HMRC statistics, as of August 2016 22.6% of all dependent children in Enfield were in low-income families.</p> <p>Homeless¹³ - According to a Smith Institute Report from June 2019, there were 852 cases of Homelessness duty owed in Enfield.</p> <p>There are no known statistics on refugee status in Enfield.</p>		<p>During Construction:</p>		
	N	<p>We do not anticipate the site works to negatively impact persons due to being homeless, on a low income or those with refugee status.</p> <p>Impacts will however be monitored during completion of the scheme.</p>		
		<p>Post Construction:</p>		
<p>Pregnancy/maternity</p> <table border="1" data-bbox="225 1507 592 1630"> <tr> <td data-bbox="225 1507 411 1630">% Pregnancy or Maternity</td> <td data-bbox="411 1507 592 1630">Unknown</td> </tr> </table>	% Pregnancy or Maternity	Unknown		<p>During Construction:</p>
	% Pregnancy or Maternity	Unknown		
Y	<p>Pedestrian Diversions - During construction, diversions for pedestrians may be required. There may be some negative impacts due to increased or diverted walking routes for temporary periods of time. This may be felt more by some women during pregnancy, or those carrying infants, who may find walking for longer distances more difficult.</p> <p>Locations affected: Bowes Road</p>			

¹³ <https://governance.enfield.gov.uk/documents/s77276/Homelessness%20in%20Enfield%20Final.pdf>



		Post Construction:
	N	We do not anticipate the completed development to negatively impact persons due to pregnancy or maternity. Impacts will however be monitored on completion of the scheme.
Race Taken from Enfield Council Insight Team and ONS 2018 Estimates:		During Construction:
	N	We do not anticipate the completed development to negatively impact persons due to their race. Impacts will however be monitored during completion of the scheme.
		Post Construction:
	N	We do not anticipate the completed development to negatively impact persons due to their race. Impacts will however be monitored on completion of the scheme.

	Enfield	Southgate Green
Total BAME	39%	33%
Black African	7.41	3.5
Bangladeshi	1.92	1.6
Black Caribbean	5.29	2.4
Chinese	0.82	1.5
Greek	1.36	1.9
Greek Cypriot	4.85	7.4
Indian	3.55	7.2
Kurdish	1.28	0.6
Other Asian	3.84	3.6
Other Black	2.5	1.5
Other	3.99	4.2
Other Mixed	2.06	2.0
Pakistani	0.85	1.1
Somali	2.74	0.7
Turkish	7.25	3.3
Turkish Cypriot	1.92	1.3
White and Black Caribbean	1.4	0.9
White and Black African	0.74	0.8
White and Asian	1.3	1.6
White British	35.18	39.8
White Irish	2.17	2.8



<table border="1"> <tr> <td>White</td> <td>7.59</td> <td></td> </tr> <tr> <td>Other</td> <td></td> <td></td> </tr> </table>	White	7.59		Other													
White	7.59																
Other																	
<p>Religion or belief</p> <p>Enfield as of 2011 Census:</p> <table border="1"> <tr> <td>Christian</td> <td>53.6%</td> </tr> <tr> <td>Muslim</td> <td>16.7%</td> </tr> <tr> <td>No Religion</td> <td>15.2%</td> </tr> <tr> <td>Hindu</td> <td>3.5%</td> </tr> <tr> <td>Jewish</td> <td>1.4%</td> </tr> <tr> <td>Buddhist</td> <td>0.6%</td> </tr> <tr> <td>Sikh</td> <td>0.3%</td> </tr> <tr> <td>Other</td> <td>8.7%</td> </tr> </table>	Christian	53.6%	Muslim	16.7%	No Religion	15.2%	Hindu	3.5%	Jewish	1.4%	Buddhist	0.6%	Sikh	0.3%	Other	8.7%	<p>During Construction:</p> <p>Y</p> <p>Increased Traffic – Nearby places of worship may be affected during delivery of the scheme due to their proximity to the work site and any diverted or increased construction traffic. This may affect those congregating outside of or travelling to places of worship. The construction management plan will aim to reduce impacts wherever possible by optimising and controlling deliveries at key areas/ times and keeping noise or dust within regulated levels.</p> <p>Locations affected:</p> <p>Our Lady of Lourdes Church may be particularly affected due to construction traffic along Bowes Road. However, the site is set back from the road so impacts of noise and to the congregation will be minimised.</p> <p>Post Construction:</p> <p>N</p> <p>We do not anticipate the completed development to negatively impact persons due to their religion or belief.</p> <p>Impacts will however be monitored on completion of the scheme.</p>
Christian	53.6%																
Muslim	16.7%																
No Religion	15.2%																
Hindu	3.5%																
Jewish	1.4%																
Buddhist	0.6%																
Sikh	0.3%																
Other	8.7%																
<p>Sexual orientation</p> <p>Enfield:</p> <table border="1"> <tr> <td>% Sexual Orientation</td> <td>Unknown</td> </tr> </table> <p>A 2016 Survey by the Office of</p>	% Sexual Orientation	Unknown	<p>During Construction:</p> <p>Y</p> <p>Safety / feeling of safety - Fears of intimidation and/or abuse are sometimes mentioned by LGBT Londoners as barriers for increased public transport use. LGBT Londoners may therefore experience lower perception of personal safety as a result. This may be negatively impacted by the removal of parking, requiring people to travel by other means, and pedestrian diversions away</p>														
% Sexual Orientation	Unknown																



<p>National Statistics, found that 2.7% of Londoners identify as LGB, an increase from 2015. ¹⁴</p> <p>We do not have statistics for Enfield, which may be higher or lower than this average.</p>		<p>from familiar routes.</p> <p>Locations Affected – Bowes Road</p>
		<p>Post Construction:</p>
	Y	<p>Safety / feeling of safety - Fears of intimidation and/or abuse are sometimes mentioned by LGBT Londoners as barriers for increased public transport use. LGBT Londoners may therefore experience lower perception of personal safety as a result. This may be negatively impacted by the removal of car parking, requiring people to travel by other means.</p> <p>Locations Affected – Arnos Grove Station</p>

¹⁴

<https://www.ons.gov.uk/peoplepopulationandcommunity/culturalidentity/sexuality/bulletins/sexualidentityuk/2016>

16



Q5. Given the evidence listed in step 2, consider and describe what potential positive impacts this work could have on people related to their protected characteristics?

Protected Characteristic		Explain the potential positive impact
<p>Age</p> <p>According to official HMRC statistics, as of August 2016 22.6%, of all dependent children in Enfield were in low-income families.</p>	Y	<p>Affordable Housing - Enfield has a very high proportion of households that contain dependent children and a similarly poor position for household [REDACTED]. By providing affordable, family sized rental properties, children from lower income families will be able to grow up in a safe and high-quality environment which conforms to London minimum Space Requirements, aiding overcrowding.</p> <p>Locations Affected: Scheme Residents</p>
	Y	<p>Decreased Traffic - As the development is car free, the reduction of traffic, particularly during peak hours will also make the roads safer and feel safer. This, along with the knock-on improvements in air quality, will help to encourage more active travel, improving the health of young people in the area and directly contributing to the Healthy Streets strategy.</p> <p>Locations Affected: Entire Scheme, Bowes Road.</p>
	Y	<p>Improved Public Realm - Younger residents of Enfield, both those living within the scheme and those nearby, will benefit from the scheme's improved public realm, including dedicated play spaces in a car free development and increased passive surveillance. We are working with the borough's Secured by Design officer to ensure the benefits of these spaces are maximised, while minimising potential negative impacts.</p> <p>Locations Affected: Entire Scheme</p>
		<p>Economic Growth and Training - We will be working to create local jobs and training opportunities during construction to help plug the skills gap in the construction industry and provide economic growth for the area.</p> <p>Training opportunities will include the creation of apprenticeships which generally target younger people at school leaving age and at the start of their careers. We will also be focussing on targeting traditionally underrepresented groups within the industry.</p>



Disability including carers	Y	<p>Decreased Traffic – Disabled users may benefit from the reduced traffic on site, and while parking has been removed, blue badge spaces will be retained. The removal of parking will contribute to a significantly reduced amount of traffic on the site, making it safer, and feel safer, for more vulnerable users to travel through.</p> <p>Locations Affected: Entire Scheme</p>
	Y	<p>Affordable Housing – Disabled Londoners are more likely to live in a household with an annual income of £20,000 or less than non-disabled Londoners (61% compared with 25%). They are therefore more likely to benefit from an affordable housing scheme.</p> <p>Homes will also be allocated through the Enfield Housing Allocation Scheme, which prioritises those with a more urgent need for suitable housing, including disabled people.</p>
	Y	<p>Accessible Housing - 10% of units in the scheme will be reserved as dedicated accessible homes in accordance with the Building Regulation 2010 requirement M4(3): “Wheelchair user dwellings”. All other units will be designed in accordance with Building Regulation Standards M4(2), “Accessible and adaptable dwellings”.</p> <p>Adaptable dwellings will enable those with a variety of access requirements to live in and visit the building, while ensuring there are always adequate facilities available for those with wheelchairs. These standards ensure that the entire scheme is open to disabled people and many needs can be met by all units.</p>
	Y	<p>Improved Public Realm – Disabled Londoners are most likely to report that they are dissatisfied with the pavements or consider pavement conditions a barrier to travel. Improvements to the public realm, including new footways, open pedestrianised areas and reduced traffic will contribute to increased levels of ambience benefits, which will be felt more by disabled users.</p>
Gender	Y	<p>Safety / feeling of safety – Women are more likely than men to experience worries or concerns when using public transport, including concerns over safety and anti-social behaviour.</p> <p>The improvement of public realm spaces, including better lighting, higher footfall and passive surveillance will help</p>



		improve safety and the feeling of safety for female travellers. We will also work with the borough's Secured by Design and Crime Prevention Officers to identify and address any potential issues, helping to discourage anti-social behaviour wherever possible.
	Y	Affordable Housing – Women are more likely than men to be on lower incomes. As the scheme will benefit those in need of affordable housing, it is likely that women in the area will experience an increased benefit. Locations affected: Residents of the development.
	Y	Economic Growth and Training - We will be working to create local jobs and training opportunities during construction to help plug the skills gap in the construction industry and provide economic growth for the area. We will specifically be targeting underrepresented areas in the industry such as women to provide these vital opportunities.
Gender reassignment	Y	Safety / feeling of safety - Fears of intimidation and/or abuse are sometimes mentioned by LGBT Londoners as barriers for increased public transport use. LGBT Londoners may therefore experience lower perception of personal safety as a result. Improvements to the public realm space, such as better lighting, passive surveillance and increased footfall contribute to a reduction in anti-social behaviour, safety and the feeling of safety, which may provide a positive impact to people in this group. Locations Affected – Arnos Grove Station, Entire Development
Marriage/civil partnership	N	While we expect all residents and most locals to benefit in some way from the scheme, we do not anticipate there to be an impact on persons specifically due to their married status. Impacts will however be monitored on completion of the scheme.



<p>Other – e.g. refugees, low income, homeless people¹⁵</p>	<p>Y</p>	<p>Affordable Housing – Those on lower incomes often struggle to find secure tenures in the private rental market, however in 2011, over half (53%) of all households in Enfield claiming some form of housing benefit were in the Private Rental Sector.</p> <p>By offering discounted market rents and prioritising those who live and work in the borough, we will be providing affordable homes for residents in their local area, under secure and fair tenures.</p> <p>The scheme also contributes to the London Borough of Enfield Housing Strategy.</p> <p>Locations affected: Entire Scheme</p>
	<p>Y</p>	<p>Anti-Social Behaviour and Safety/ Feeling of Safety – Buildings will be completely secured, with the development managed by an on-site concierge, allowing residents to feel completely safe in their homes. Some existing Grainger developments provide a 24-hour concierge service however precise arrangements for Arnos Grove will be finalised in the property management plan, prior to practical completion of the scheme in 2022.</p> <p>Concerns about antisocial behaviour and crime are particularly mentioned as barriers to public transport use by Londoners living in D-E households, of whom 41% say that concerns about anti-social behaviour affect their travel frequency. Those on lower incomes tend to experience higher crime rates around their homes. By providing affordable homes in secure developments, this will benefit residents on lower incomes.</p> <p>Car parks can also create dark enclosed spaces which can feel less safe. We are replacing the existing car parks with open public realm spaces which will be well lit, experience more foot traffic and the homes in the development will provide natural surveillance where there is currently very little. This will contribute to a feeling of safety in the area. We will also work with the borough’s Crime Prevention Officer to identify and address any potential issues.</p> <p>Locations affected: Entire Scheme</p>

¹⁵ <https://data.london.gov.uk/dataset/average-private-rents-borough>



	Y	<p>Economic Growth and Training - We will be working to create local jobs and training opportunities during construction to help plug the skills gap in the construction industry and provide economic growth for the area.</p> <p>We will also be focussing on targeting traditionally underrepresented groups within the industry such as ex-offenders.</p> <p>While it is not possible for us to know how many ex-offenders there are in Enfield, there may be an identifiable benefit to some people in this group.</p>
Pregnancy/maternity	N	<p>While we expect most residents and locals to benefit in some way from the scheme, we do not anticipate there to be a positive impact on persons specifically due to pregnancy or maternity.</p> <p>Impacts will however be monitored on completion of the scheme.</p>
Race	Y	<p>Economic Growth and Training - We will be working to create local jobs and training opportunities during construction to help plug the skills gap in the construction industry and provide economic growth for the area.</p> <p>We will specifically be targeting underrepresented groups in the industry such as BAME to provide these vital opportunities.</p>
	Y	<p>Decreased Traffic and Safety/ Feeling of Safety - BAME Londoners, both adults and children, are twice as likely as white Londoners to be injured on the roads. BAME Londoners are also less likely than white Londoners to say that they feel safe from road accidents when walking around London at night compared to White Londoners.</p> <p>As the scheme replaces the existing car-park with a car free development, it is predicted that there will be a positive effect on traffic flows in the area. This may positively impact BAME Londoners more significantly as they are the most likely to be, or feel, unsafe from road accidents when walking around London, particularly at night.</p>



<p>Religion or belief</p>	<p>N</p>	<p>Decreased Traffic and Safety – Removal of the car park will help to encourage more active modes of transport and reduce traffic along Bowes Road. This will be a benefit to those who travel along the road regularly, particularly congregants of The Lady of Lourdes Church which is close to Arnos Grove Station.</p> <p>Benefits may be experienced when congregating outside and walking or cycling to and from the church. The church itself is set back from the road so any reduction in noise will be small.</p> <p>Locations Affected – Bowes Road, Lady of Lourdes.</p>
<p>Sexual orientation</p>	<p>N</p>	<p>Safety / feeling of safety - Fears of intimidation and/or abuse are sometimes mentioned by LGBT Londoners as barriers for increased public transport use. LGBT Londoners may therefore experience lower perception of personal safety as a result.</p> <p>Improvements to the public realm space, such as better lighting, passive surveillance and increased footfall contribute to a reduction in anti-social behaviour, safety and the feeling of safety, which may provide a positive impact to people in this group.</p> <p>Locations Affected – Arnos Grove Station, Entire Development</p>



Step 4: Consultation

Q6. How has consultation with those who share a protected characteristic informed your work?

<p>List the groups you intend to consult with or have consulted and reference any previous relevant consultation?¹⁶</p>	<p>If consultation has taken place what issues were raised in relation to one or more of the protected characteristics?</p>																	
<p>Local places of worship</p>	<p>Gurudwara – Nanak Darbar North London, Our Lady of Lourdes Church, and Palmers Green and Southgate United Synagogue were invited to the consultations in Arnos Grove. They did not attend.</p> <p>We do not have faith data from the consultation responses to indicate whether people from these faith groups attended, however we do know that 70.45% of responses identified as white, a disproportionate number compared to Enfield’s BAME demographics. The lack of BAME responses may indicate a lack of responses from the Gurudwara and other faith groups.</p>																	
<p>Local businesses</p>	<p>All local businesses were visited to notify them of potential changes to the area and personally invite them to the upcoming consultations. Although no official feedback was collected at that point, there was a general response that the increased footfall created by the development, coupled with the effects of the reduced traffic and increased active modes of transport to the station, would provide a significant benefit to the businesses.</p>																	
<p>General Consultation Feedback.</p>	<table border="1" data-bbox="416 1301 1596 1776"> <thead> <tr> <th data-bbox="416 1301 1007 1339">Date</th> <th data-bbox="1007 1301 1596 1339">Task</th> </tr> </thead> <tbody> <tr> <td data-bbox="416 1339 1007 1406">19th June 2019</td> <td data-bbox="1007 1339 1596 1406">Initial ‘Meet the Team’ Public Consultation event</td> </tr> <tr> <td data-bbox="416 1406 1007 1480">4th / 5th November 2020</td> <td data-bbox="1007 1406 1596 1480">Meeting with Arnos Grove Ward Councillors</td> </tr> <tr> <td data-bbox="416 1480 1007 1554">5th November 2020</td> <td data-bbox="1007 1480 1596 1554">Brief the Enfield Planning Committee</td> </tr> <tr> <td data-bbox="416 1554 1007 1592">6th November 2020</td> <td data-bbox="1007 1554 1596 1592">Public Consultation event #1</td> </tr> <tr> <td data-bbox="416 1592 1007 1630">7th November 2020</td> <td data-bbox="1007 1592 1596 1630">Public Consultation event #2</td> </tr> <tr> <td data-bbox="416 1630 1007 1704">16th November 2020 (did not occur)</td> <td data-bbox="1007 1630 1596 1704">Pop-up stall held at Arnos Grove station (did not occur)</td> </tr> <tr> <td data-bbox="416 1704 1007 1776">February 2020</td> <td data-bbox="1007 1704 1596 1776">Statement of Community Involvement produced to support planning application</td> </tr> </tbody> </table> <p>In addition to public exhibition events, ‘Give My View’, an online engagement platform was also used to capture views and feedback in addition to those that attended public consultation events to ensure that outreach was maximised.</p>		Date	Task	19 th June 2019	Initial ‘Meet the Team’ Public Consultation event	4 th / 5 th November 2020	Meeting with Arnos Grove Ward Councillors	5 th November 2020	Brief the Enfield Planning Committee	6 th November 2020	Public Consultation event #1	7 th November 2020	Public Consultation event #2	16 th November 2020 (did not occur)	Pop-up stall held at Arnos Grove station (did not occur)	February 2020	Statement of Community Involvement produced to support planning application
Date	Task																	
19 th June 2019	Initial ‘Meet the Team’ Public Consultation event																	
4 th / 5 th November 2020	Meeting with Arnos Grove Ward Councillors																	
5 th November 2020	Brief the Enfield Planning Committee																	
6 th November 2020	Public Consultation event #1																	
7 th November 2020	Public Consultation event #2																	
16 th November 2020 (did not occur)	Pop-up stall held at Arnos Grove station (did not occur)																	
February 2020	Statement of Community Involvement produced to support planning application																	

¹⁶ This could include our staff networks, the Independent Disability Advisory Group, the Valuing People Group, local minority groups etc.



Age

During our digital consultation for Arnos Grove, the “Give My View” digital engagement motivated 1,277 people to vote in the polls.

Of those that voted, 74% were local residents. Additionally, the reach was much more successful using this new engagement method, particularly in the lower age ranges than public consultation events. The age range with the highest number of respondents was 25-34; a traditionally hard to reach demographic. This helped to create a more balanced view of responses.



The gender and age demographic information is collected through the respondents Facebook/Instagram account information.

In contrast, the public consultation on the 6th and 7th November received 94 responses. Of the 91 responders that reported on age, 84.62% were over 50 years of age, and 63.74% over 60. Only 5.5% of responses were from those under 30. Of 72 who reported their gender, 53.73% were male, compared to 48.2% of Enfield.

Additionally, 88 opted to provide data on ethnicity. 70.45% of respondents reported as White, well above the 40.5% rate for Enfield residents. Only 1.14% reported as Black African/Caribbean/British, below the 9% for Enfield.

There was, as expected a concern for the loss of the car park and the impact this may have on traffic congestion, pressure on local infrastructure and parking on local streets. 60% of those that voted however agreed that there was a need for more affordable housing in the area and that it was the main issue for renters in Enfield, while 78.16% of responses cited improvements to public transport and reduction of traffic as priorities for improving air quality in the borough.

65.17% of respondents stated they were “Unhappy” (1, on a scale of 1 – 10), with the removal of the car-parking at Arnos Grove. Only 21.35% indicated they were happy about the proposal (score of 6 – 10).

Unfortunately, we cannot say whether these responses were due to the impact on protected characteristics, or the general removal of amenity.

Lower Incomes

Affordability and need for housing were identified as benefits of the scheme, by 39.08% of respondents to the public consultation. Additionally, almost 30% thought the investment in the local economy would help improve Enfield.

Issuing feedback to respondents

86.15% of respondents to the public consultation, opted to receive updates. This will allow the



	<p>project team to easily share information amongst those who wish to be involved in the development of the scheme.</p> <p>Updates and responses to consultation feedback will also be published on the scheme website.</p>
--	---

Q7. Where relevant, record any consultation you have had with other projects / teams who you are working with to deliver this piece of work. This is important where the mitigations for any potential negative impacts rely on the delivery of work by other teams.

We have consulted with several internal stakeholders including:

- Operational Delivery Manager
- LU Sponsor
- LU Infrastructure Protection
- Buses and Surface Teams
- NCP Car Park Management for existing car parks

We have also consulted with the Step Free Access team. While they are not currently planning to provide step free access at Arnos Grove, we have agreed to leave a provision available for this to be installed in the future.



Step 5: Informed Decision-Making

Q8. In light of the assessment now made, what do you propose to do next?

Please select one of the options below and provide a rationale (for most EqIAs this will be box 1).
 Please remember to review this as and when the piece of work changes

<p>1. Change the work to mitigate against potential negative impacts found</p>	<p><input checked="" type="checkbox"/> Changes to the work already undertaken are detailed in this document. Mitigation measures are detailed in Step 6: Action Planning.</p>
<p>2. Continue the work as is because no potential negative impacts found</p>	
<p>3. Justify and continue the work despite negative impacts (please provide justification)</p>	
<p>4. Stop the work because discrimination is unjustifiable and no obvious ways to mitigate</p>	



Step 6: Action Planning

Q9. You must address any negative impacts identified in step 3 and 4. Please demonstrate how you will do this or record any actions already taken to do this. Please remember to add any positive actions you can take that further any positive impacts identified in step 3 and 4.

Action	Due/ Status	Owner
Negative Impacts		
Blue Badge Parking – Ensure Blue Badge Parking is available to those who need it.	<p>3% blue badge spaces will be provided for residents with an additional provision to expand to a total of 10% residential spaces, should demand increase in line with requirements of the emerging London Plan. Use of these spaces will be monitored to understand demand.</p> <p>The 6 existing public Blue Badge Spaces will be re-provided in the new scheme. A utilisation survey conducted in October 2019 showed that 4 spaces were in use during peak hours on both a Thursday and a Saturday. By providing the 6 current spaces this should adequately meet the current demand and minimise disruption.</p> <p>We are also working with Enfield borough regarding the layout, operation and public realm associated with the bus interchange outside the station. Maintaining or improving this interchange will allow for easy public transport access to both the site and the wider area. This will be refined in later design phases and confirmed prior to design freeze in late 2020.</p> <p>We will as far as possible, seek to maintain blue badge parking throughout construction. This will be addressed in the construction management plan. A high-level version will be issued along with planning submission in March 2020, however plans will be finalised once a contractor is appointed in Autumn 2020.</p> <p>We will work with NCP who currently manage the car-park to identify and notify regular users by email or letter. Notices will also be provided in the car-park itself and the station 6 months prior to full closure, to ensure those affected are notified in good time.</p>	Connected Living London



	<p>Details and decisions will also be published on the scheme website and communicated via consultation responses where relevant.</p>	
<p>Pedestrian Diversions – Ensure diversions are properly planned and managed throughout the construction phase.</p>	<p>We will ensure any diversions are safe and accessible and are properly signposted for minimal disruption. Seating will be made available at regular intervals on longer diversions to provide rest stops for those who need them. This will be handled in detail as part of the construction management plan, which will be finalised after contractor appointment towards the end of 2020. The project team can work with Michal Barratt (Development Impact Assessment Manager) to carry out a Tier 3 assessment as required.</p>	<p>Connected Living London</p>
<p>Removal of Parking – Ensure alternative solutions are available and disruption from the closure is minimised as best as possible.</p>	<p>Car park users will be notified 6 months prior to the full car park closure to ensure minimal disruption. We will work with NCP who manage the car park to notify regular users via email and letters. Notices will also be provided in the car parks themselves to ensure regular, and casual users are notified.</p> <p>Details will also be published on the scheme website, and those who responded during the consultation will receive updates of any relevant changes.</p> <p>We have identified several public transport routes which provide alternative transport to the station for many users and are investigating the potential to utilise our Community Infrastructure Levy to create a transport hub to improve public transport.</p>	<p>Connected Living London</p>
<p>Antisocial Behaviour and Safety / Feeling of Safety – Ensure safety is considered and managed at all stages.</p>	<p>As well as the scheme being secure and therefore safer for residents, we are also working with a Secured by Design (SBD) officer. SBD is a police initiative that improves the security of buildings and their immediate surroundings to provide safe places to live, work, shop and visit. Secured designs will help with both the safety and feeling of safety in the scheme, preventing the creation of spaces which encourage antisocial behaviours.</p> <p>We will also seek to ensure that accessible provisions such as seating are not affected by secured design or other approaches. Details and utilisation of public realm space and the bus interchange will be confirmed at design freeze in</p>	<p>Connected Living London</p>



	late 2020.	
<p>Increased Traffic and Construction Traffic – Ensure the construction management plan is developed and changes to road use or public transport services are communicated in advance to minimise the impact on the public and staff.</p>	<p>We will be required to submit and agree a construction management plan prior to planning consent being granted. This will include a strategy for managing traffic, which will be agreed with the local authority. This will help to mitigate the impacts of traffic diversions and consider appropriate delivery times and potential mitigations, such as combining deliveries to minimise numbers.</p> <p>We will also ensure to prevent additional impacts for pedestrians by planning necessary diversions along with our traffic management plan. This will help to reduce interactions and increase safety and the feeling of safety along diverted routes. This will be handled in detail as part of the construction management plan, which will be finalised after contractor appointment towards the end of 2020.</p>	<p>Connected Living London</p>
<p>Positive Impacts</p>		
<p>Affordable Housing – Work with local authorities to identify ways to reach the most in need people.</p>	<p>We will be working with the local authority to identify those most in need to benefit from our affordable housing. This will enable us to reach those who already live and work in the borough and have fewer options available or are on the lowest incomes.</p> <p>Enfield council will be able to recommend families for the scheme based on need which will help to identify those people in the first instance. We will work with the borough around 2- 3 months prior to practical completion, to ensure timely recommendations are made. This is estimated as Autumn 2021. Leases will be managed by Grainger’s housing management team.</p>	<p>Connected Living London/ Grainger</p>
<p>Decreased Traffic – Ensure traffic on the new development is managed correctly to maintain benefits.</p>	<p>Removing the station parking will have an overall positive effect on traffic in the area during peak hours. As a car free development, residents may need to rely more on delivery services.</p> <p>There will be dedicated delivery routes for access to the development, including access for disabled residents. This will prevent deliveries from stopping</p>	<p>Connected Living London</p>



	<p>in the public realm space or on the roads.</p> <p>We are working with our transport consultants Pell Frischmann to understand the potential options for the bus interchange and taxi ranks at the front of the station. Designs will be developed further in the next stage following submission of planning permission in March 2020. From this point we will be able to further refine any options, including wider surface transport movements and requirements of the area. A final design will be confirmed by Autumn 2020.</p>	
<p>Antisocial Behaviour – Ensure the design discourages anti-social behaviour, and the completed development is managed correctly.</p>	<p>As well as the scheme being secure and fully managed, and therefore safer for residents, we are also working with a Secured by Design officer. SBD is a police initiative that improves the security of buildings and their immediate surroundings to provide safe places to live, work, shop and visit. Final designs will be confirmed following the next phase, with a final design freeze in Autumn 2020.</p> <p>The development will be fully managed by Grainger and will conform to their own standards and processes with regards to the management of antisocial behaviour.</p> <p>Some previous Grainger developments have 24 hour concierge services, which may be considered as part of the housing management plan. This will be finalised by Grainger during construction of the scheme in 2021 – 2022.</p>	<p>Connected Living London</p>
<p>Safety and Feeling of Safety - Work with relevant parties to ensure safety is maintained throughout construction. Ensure the scheme design is fit for purpose and enhances positive impacts.</p>	<p>We are working with a Secured by Design officer, to improve the security of the scheme. Secured designs will help with both the safety and feeling of safety in the scheme, preventing the creation of spaces which encourage antisocial behaviours, and therefore contributing to the safety and perception of safety in the development.</p> <p>We will also be looking at the possibility of 24 hour concierge service in the development, this will be decided by Grainger, and finalised in their property management plan by the end of 2021.</p> <p>We will also seek to ensure that accessible provisions such as seating are not affected by secured design or other approaches. Details will be confirmed at design freeze in late 2020.</p>	<p>Connected Living London and Grainger</p>



<p>Economic Growth and Training – Ensure that we target underrepresented groups and plug vital skills gaps.</p>	<p>We will work with the local borough to recruit locally, specifically targeting underrepresented groups in the industry, such as women and BAME.</p> <p>We will also be investigating how the Community Infrastructure Levy can best be utilised to support the local community, including improving transport links. Details of precise recruitment will be confirmed prior to starting on site in March 2021.</p>	
<p>Improved Public Realm– Ensure that play space is provided in the development and maintained to protect the provision.</p>	<p>Dedicated play spaces will be designed into the space along with landscaping to make the most of the space available. Questions on how to use the public realm were included in the public consultations to ensure we provide the most beneficial space for the residents and locals. Detailed design of the public realm space will be finalised in the next stage of design, by the end of 2020.</p> <p>We are working with Enfield’s Secure by Design officer to ensure public spaces do not encourage antisocial behaviour. The completed development will also be fully managed by Grainger, and any residual concerns considered in their Housing Management Strategy. These actions will help to maintain the public realm benefits. This will be produced following design freeze and will be finalised during construction, prior to practical completion of the scheme in late 2022.</p>	<p>Connected Living London</p>
<p>Accessible Housing – Ensure all homes meet Accessibility Requirements and standards including the ability to be adapted for future changes in use.</p>	<p>10% of units in the scheme will be reserved as dedicated accessible homes in accordance with the Building Regulation 2010 requirement M4(3): “Wheelchair user dwellings”.</p> <p>All other units will be designed in accordance with Building Regulation Standards M4(2), “Accessible and adaptable dwellings” to provide for other types of access needs and potential future requirements.</p> <p>There will be an initial 3% blue badge spaces on the site for use by residents, with provision to increase this to 10% depending on demand. This will enable flexible use of the homes, adapting to residents’ needs and ensuring they remain accessible for future residents.</p>	<p>Connected Living London</p>





John Willans
Alan Baxter Associates
75 Cowcross Street
London EC1M 6EJ

Sent by email: [REDACTED] [alanbaxter.co.uk](mailto:[REDACTED]@alanbaxter.co.uk)

19 November 2019

Our ref: 19 11 02

Dear John Willans,

ARNOS GROVE CAR PARK DEVELOPMENT PRE-APP CONSULTATION RESPONSE

Thank you for inviting the Twentieth Century Society to learn about proposals for residential development adjacent to Arnos Grove Underground Station. I attended a meeting with the design team on Thursday 31 October and the proposals were presented to the Society's Casework Committee on Monday 11 November. The comments below reflect the views of the Casework Committee.

Background

Arnos Grove is an Underground Station designed by Charles Holden as part of the eastern extension of the Piccadilly Line carried out during the 1930s. Arnos Grove was built in 1932 and is now listed at Grade II*. Multiple sources state that Holden's Piccadilly line stations were influenced by modern buildings he visited on an architectural tour of Northern Europe and Scandinavia in 1930. Arnos Grove bears a particular resemblance to Stockholm's Central Library by Gunnar Asplund that was opened in 1928.

It is generally accepted that Arnos Grove was Holden's best Piccadilly Line extension station in design terms, as well as being the architect's personal favourite. The building's list description states that the extension stations "were of great importance for introducing rational modern design based on continental models to a wider public and for imposing a brand image to buildings and design when this was still novel." Gavin Stamp, writing in Architectural Design's double issue 'Britain in the Thirties' (Vol 49 No.19-11, 1979), stated that Holden's stations from this period "are an elegant and rational development of tradition in response to modern conditions." Stamp also reflected on the connection between Arnos Grove and Ledoux's Barriere de la Villette in Paris (1784-87), "which in its suburban location it resembles symbolically". Holden's Piccadilly line extension stations share a language of utilitarian materials and exposed structural elements, generally using bold forms, radiant light and prominent signage to serve as landmarks.

Comments

The Society welcomes the general principle of developing surface car parks to provide new housing. We recognise the efforts made by TfL and the design team to understand and protect the listed station's historic significance within the scope of this development.

We are of the view that the proposed development is at the maximum scale acceptable, and we would oppose any move to increase the height of residential buildings or to bring them closer to the listed building. Arnos Grove's surroundings are predominantly suburban in character with most buildings being 2 and 3 storey terraced and semi-detached houses with some parades of shops closer to the station on Bowes Road, and in our view this character should be taken in to consideration when determining the scale of the proposed development.

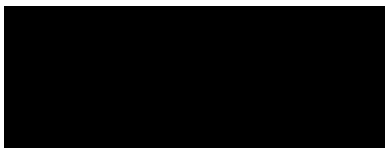
The Society's principal concern is the clarity of the drum and its visibility when viewed on the approach to the station. Currently the drum is seen against a backdrop of trees and sky, the latter of which has the additional benefit of allowing daylight to enter the ticket office and well as allowing light to radiate from the station during dark evenings. In our view the drum succeeds in appearing larger than it really is and achieves a sense of prominence in the streetscape, partially due to its isolation and lack of surrounding buildings to scale against. In our opinion there is a risk that a change in setting has the potential to overwhelm the station.

The introduction of the public square to the north of the station is perceived to be positive by the Society, however the design of this space should be revised to minimise any potential harm to the setting of the listed station. We are concerned by the proximity of the proposed single-storey retail to the north west corner of the station, and consider that this would be improved by the proposed building being set further back to give the station 'breathing' space. In our view the proposed pergola would constrain the openness of the square and creates an unnecessary statement that would compete with the station. Similarly, the introduction of trees into the proposed square needs to be very carefully planned, and our preferred option would be an alternative landscape feature that is more contained and offers less bulk at a high level to preserve views around the drum.

It is generally accepted that Arnos Grove is one of the most important London Underground stations and is arguably the best station designed by Charles Holden. In the Society's view Arnos Grove should be seen as the jewel in TfL's crown, and proposals that affect its setting should be led by great awareness and sensitivity. We hope that the concerns and recommendations in this letter are taken into consideration as the scheme develops, and we wish to continue to be involved in discussions with the design team as the proposals are refined.

I trust that these comments are of use to you. Please do not hesitate to contact me if you have any further queries.

Yours sincerely,



Grace Etherington

Caseworker

Twentieth Century Society

Remit: The Twentieth Century Society was founded in 1979 and is the national amenity society concerned with the protection, appreciation, and study of post-1914 architecture, townscape and design. The Society is acknowledged in national planning guidance as the key organisation concerned with the modern period and is a constituent member of the Joint Committee of the National Amenity Societies. Under the procedures set out in *ODPM Circular 09/2005*, all English local planning authorities must inform the Twentieth Century Society when an application for listed building consent involving partial or total demolition is received, and they must notify us of the decisions taken on these applications.

The Twentieth Century Society

70 Cowcross Street, London EC1M 6EJ

c20society.org.uk

www.c20society.org.uk

Jacob Gemma

From: Brown Mary
Sent: 23 November 2020 10:39
To: Campbell Lee; Allison De Marco; Rebecca Crow
Subject: RE: Arnos Grove

Thanks Allison,

Both the times suggested all work for me

Mary

From: Campbell Lee <[REDACTED]@tfl.gov.uk>
Sent: 23 November 2020 10:34
To: Allison De Marco <[REDACTED]@enfield.gov.uk>; Brown Mary <[REDACTED]@tfl.gov.uk>; Rebecca Crow <[REDACTED]@graingerplc.co.uk>
Subject: RE: Arnos Grove

Thanks Allison - I am free until 11am and then from 12?

Rebecca? Mary?

Lee

From: Allison De Marco <[REDACTED]@enfield.gov.uk>
Sent: 23 November 2020 10:29
To: Campbell Lee <[REDACTED]@tfl.gov.uk>; Brown Mary <[REDACTED]@tfl.gov.uk>; Rebecca Crow <[REDACTED]@graingerplc.co.uk>
Subject: RE: Arnos Grove

Would be helpful to talk this morning if you have some time?

Thank you,
Allison

Allison De Marco MRTPI
Planning Decisions Manager – Strategic Applications
Planning Service
Place Department
Enfield Council

E: [REDACTED]@enfield.gov.uk
W: www.enfield.gov.uk



Enfield Council is committed to serving the whole Borough fairly, delivering excellent services and building strong communities

Please do not print this e-mail unless necessary – Help save the planet

From: Campbell Lee <[REDACTED]@tfl.gov.uk>
Sent: 23 November 2020 10:16
To: Allison De Marco <[REDACTED]@enfield.gov.uk>; Brown Mary <[REDACTED]@tfl.gov.uk>; Rebecca Crow <[REDACTED]@graingerplc.co.uk>
Subject: RE: Arnos Grove

Thanks Allison – we will have a quick look through this this morning.

Lee

From: Allison De Marco <[REDACTED]@enfield.gov.uk>
Sent: 20 November 2020 20:01
To: Brown Mary <[REDACTED]@tfl.gov.uk>; Campbell Lee <[REDACTED]@tfl.gov.uk>
Subject: RE: Arnos Grove

Mary and Lee,

I have provided updated wording below based on the enhanced offer. I am still working on the update report as we are receiving representations. We do however aim to send this out today.

On the basis that: S278 works are not capped for necessary highway improvements.

And DEN connection is agreed in line with the draft s106 wording I shared on Monday, we would accept the revised offer.

Section 2 of the Committee Report: Update

1.1 An update on the main report Heads of Terms is set out below at paragraph 1.2. In summary, Officers have secured Section 106 contributions of **£391,142** (including £180,700 towards transport and £70,957 towards health). In addition, Community Infrastructure Levy in the order of **£1,765,181** would be payable (*page 174 of the committee report*).

1.2 **Heads of Terms:**

1. Affordable housing:
 - a. Minimum of 40% by habitable room (39.5% based on units);
 - a. Tenure to comprise 30% let at London Living Rent levels and 70% Discounted Market Rent;
 - b. Rents set up to 65-70% of open market rent rates subject to the GLA's household income cap in place at the time of letting;
 - c. Marketing of **affordable Shared Ownership** homes – prioritising households that live or work in the Borough;
 - d. All related communal open space and play space in a particular Block or Plot to be available to all residents (irrespective of tenure);
 - e. Quality standards;
 - f. Affordable housing secured in perpetuity.
2. Viability Review Mechanisms:
 - a. Early Stage Review (if no "substantial commencement" within 24 months);
 - b. Late Stage Review (prior to 75% of private residential units being sold or let); and

- c. Early and Late Stage Reviews capped at 40% Affordable Housing ((30% London Living Rent (LLR) and 70% Discounted Market Rent (DMR)).
3. Build to Rent requirements:
 - a. 15-year minimum covenant;
 - b. Clawback clause;
 - c. Self-contained and let separately;
 - d. Unified management and ownership;
 - e. Tenancies of up to 5-years available to all;
 - f. Rent and service charge certainty for the length of the tenancy;
 - g. On-site management;
 - h. Complaints service in place; and
 - i. No up-front charges etc.
 4. Sustainable Transport Package (up to £45,700):

Allocation scope potential:

 - a. Car Club Membership per home for 3 years; £50 car club driving credit per home; £50 Oyster OR Cycle Voucher.
 - b. Travel Plan monitoring (£5,500), including a Travel Plan to be prepared and implemented; commitment to review; appointment of Travel Plan Coordinator and monitoring of Travel Plan initiatives including TRICS compliant surveys.
 5. Sustainable Transport Infrastructure (Healthy Streets and Improvements) (£95,000):

Allocation scope potential:

 - a. Local pedestrian, cycle and highway infrastructure beyond the red line;
 - b. Surveys (informing the need for local improvements such as a pedestrian crossing along Bowes Road; drop off-surveys; local Pedestrian / cycle Infrastructure Surveys) – with link to s278;
 6. Local Car Parking Controls: Management and Monitoring (£40,000):
 - a. A contribution towards monitoring and consultation on an extension to the CPZ near the development
 - b. Local parking consultation and extension: If post occupancy surveys show impacts with the existing CPZ, then funds provided for consultation on potential extension (to be agreed).
 7. New Resident Parking Exemption
 - a. Resident car ownership would be managed by the developer, including a clause within resident contracts restricting them from applying for or being eligible for on-street parking permits within the relevant Controlled Parking Zone.
 - b. The CPZ exemption will be secured via the S106 agreement using powers under S16 of the Greater London Council (General Powers) Act 1974
 8. Station Access Road
 - a. Improvements associated with the development of the site, within the red line boundary implemented through Section 278.
 - b. Alterations to site accesses / works to site frontage along the highway.
 9. Energy
 - a. Priority DEN connection;
 - b. Development to provide no less than a 35% improvement in total CO² emissions arising from the operation of the development and its services over Part L of Building Regs 2013.
 - c. Revised Energy Statement to be submitted;
 - d. Be Seen (Post construction monitoring). Post construction monitoring as per 'be seen' guidance.
 10. Carbon Offsetting financial contribution:
 - a. Payment of off-set contribution (£139,847 linked to 9.a);
 - b. Sign up to GLA energy monitoring platform.

11. Health financial contribution:

- a. Payment of contribution (£70,957);

12. Employment & Training:

- a. Local Labour (during construction phase); and
- b. Employment & Skills Strategy submitted and approved prior to commencement of Phase 1 and each Plot in Phase 2 using reasonable endeavours to secure: (i). 25% of local workforce, (ii). 1 x apprentice or trainee for every £Xm contract value (figure to be agreed once formula agreed) (financial contribution to be provided if not possible formula to be agreed), (iii). Quarterly apprenticeship reporting & targets, (iv). Local goods and materials, and (v). partnership working with local providers/ programmes).

13. Public Realm

- a. Public Realm Use and maintenance of the square – to be delivered as a publicly accessible space and maintained by the developer
- b. Public access – ensuring public access to proposed square (365 days, 24/7).

14. Play Space

- a. Play space provided on site shall be accessible to all housing tenures.

15. Architect Retention Clause

- a. Retention of architects

16. Other:

- a. Financial contributions to be index-linked;
- b. Considerate Constructors Scheme;
- c. LBE monitoring fee (max 5% of financial contributions);
- d. s278 agreement in line with specification to be agreed, subject to surveys.

1.3 Condition 31 (Fire Evacuation Lifts) is **amended to** (Submission of Evacuation Management plan and lift details). Fire evacuation lifts will be provided in each building, subject to development of a suitable management evacuation plan.

1.4 Condition 37 (Station Access Road works) is **added**.

Section 9 of the Committee Report: Summary or relevant assessment

1.5 A representation has been received raising concerns that Enfield Council has not considered its obligations under the Equality Act (2010) and in particular the Public Service Equality Duty (PSED) in considering the differential and negative impacts on older people, and those with mobility impairments who do not possess a blue badge (but who might make use of the TaxiCard scheme, for example). A similar comment has been made in respect of Transport for London's obligations.

1.6 The PSED is engaged when making a planning decision and in this case, respect of age and disability are the key characteristic relevant to the loss of parking. The report is clear there is no change to the number of blue badge parking associated with the station (6 spaces re-provided), there is good public transport connectivity and re-provided taxi provision. Arnos Grove station does not provide 'Step-free access from street to train' or 'Step-free access from street to platform'. 'Step-free access from street to train' is available two stations north along the Piccadilly Line, at Oakwood Station. Oakwood Station has a car park.

1.7 The report sets out Officers' detailed assessment of the overall impacts of the scheme's prioritisation of walking, cycling and low carbon transport. The report concludes there are benefits for existing station users and existing and future residents in creating a safer environment. It also considers potential improvements to local air quality. Officers concluded that impacts of the loss of the public car park are, on balance, acceptable subject to appropriate mitigation (page 154). The benefits and mitigations in summary include the following:

- 6 x blue badge parking spaces are re-provided, and quality of access to these bays improved (*main report pages 153, 156 and condition no. 35*);
 - taxi stand re-provision (*main report pages 153, 158 and condition no. 35*);
 - benefits resulting from key improvements of the new square with additional seating, shade, shelter, places to rest and cycle parking (*main report pages 71, 87, 91, 137, 157 and 159*);
 - the scheme will promote feelings of increased community safety and security through increased activity, new permanent active uses and increased footfall (*main report page 126*);
 - Conditions and Section 106 obligations, including contributions towards local transport improvements (*Paragraph 1.2 above*).
- 1.8 Officers are satisfied the assessment; applicant's design and development approach and the application material have taken the provisions of the Human Rights Act 1998 into account in the processing of the application and the preparation of the main report, and this update report. Members will be required to pay due regard to the need to: eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act; advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and foster good relations between peoples who share a relevant protected characteristic and persons who do not share it. A summary against the assessment within the main report is summarised below:
- 1.9 *Age*: Safer environments in which to walk, play and cycle predominantly have a positive effect on younger and older age groups where motor vehicle ownership is low. Page 154 notes that 33% of Enfield households have no access to a car. Local data shows a higher percentage of local households do not have a car compared with the Enfield average. In this context, public transport and active modes of travel have increased importance as a result. Improvements that support active travel would have beneficial impacts.
- 1.10 *Disability*: Disabled people are highly diverse in their capabilities and within the disabled context there are several sub groups, considered against the assessment undertaken in the Officers Report and summarised above.
- 1.11 *Physical Impairments*: Those with physical impairments are more likely to use public transport or rely on vehicles for mobility. While there may be an impact on individuals who primarily use a motor vehicle as a mobility aid – an alternative local option to a step-free station (with better step-free arrangements) remains available two stops north. Wheels for Wellbeing is a grassroots disability organisation and inclusive cycling charity based in London. It publishes guidance on inclusive cycling which notes that it is a 'common myth that Disabled people don't or can't cycle. According to Transport for London (TfL), in London alone 12% of Disabled people cycle regularly or occasionally, compared to 17% of non-Disabled people'. The scheme includes public cycle parking provision – with no loss proposed. This would have a neutral impact on disabled people who cycle.
- 1.12 Where mobility is impaired, this can make walking or crossing more complex for people and they may take longer to cross. If traffic reductions were experienced, which is expected, then these lower traffic volumes are likely to benefit people who need more time to cross. Officers have secured a package of mitigations, to support local transport improvements.
- 1.13 *Visual Impairment*: Visually impaired people will be pedestrians, users of public transport or passengers in other vehicles. Visually impaired are likely to benefit from decreased traffic flows and enhancements to public realm, although the initial change could be confusing.
- 1.14 *Learning Difficulties and Developmental Disorders*: These community members may struggle to process changes to their daily life such as a route they regularly walk with a different flow of traffic. The applicant will be required to manage construction and submit a Construction Logistics Management Plan – which would include managing communications in respect of the development. There is a local school in the area which hosts SEN children and has an ARP for pupils with autism.

There may be a positive impact on children who currently walk and cycle – if the scheme reduces traffic in the area, which is expected.

- 1.15 An Equality Impact Assessment was undertaken by Transport for London for the Arnos Grove project.

Allison De Marco MRTPI
Planning Decisions Manager – Strategic Applications
Planning Service
Place Department
Enfield Council

E: [REDACTED]@enfield.gov.uk
W: www.enfield.gov.uk

From: Brown Mary <[REDACTED]@tfl.gov.uk>
Sent: 20 November 2020 14:48
To: Allison De Marco <[REDACTED]@enfield.gov.uk>
Cc: Campbell Lee <[REDACTED]@tfl.gov.uk>
Subject: RE: Arnos Grove

Hi Allison,

I can confirm that an Equality Impact Assessment has been undertaken for the Arnos Grove project. This was reviewed and signed off by TfL's Diversity and Inclusion Team, in line with TfL's Management System for projects.

On a separate note, I wondered whether you have had an opportunity to review the revised S106 contributions discussed yesterday, and whether you have any further comments on these ahead of Tuesday's committee please?

Many thanks,

Mary

Mary Brown MRTPI
Planning Manager – Build to Rent | Property Development
Mobile: [REDACTED]
1st Floor, 31 Borough High Street, London SE1 1LY | [REDACTED]@tfl.gov.uk

From: Campbell Lee <[REDACTED]@tfl.gov.uk>
Sent: 20 November 2020 14:38
To: Allison De Marco <[REDACTED]@enfield.gov.uk>
Cc: Brown Mary <[REDACTED]@tfl.gov.uk>
Subject: RE: Arnos Grove

Mary will confirm asap.

Lee

From: Allison De Marco <[REDACTED]@enfield.gov.uk>
Sent: 20 November 2020 14:37
To: Campbell Lee <[REDACTED]@tfl.gov.uk>
Subject: RE: Arnos Grove

Thanks Lee.

Grateful if confirmation could be provided by close today.

Allison

Allison De Marco MRTPI
Planning Decisions Manager – Strategic Applications
Planning Service
Place Department
Enfield Council

E: [REDACTED] [enfield.gov.uk](mailto:[REDACTED]@enfield.gov.uk)
W: www.enfield.gov.uk

From: Campbell Lee <[REDACTED]@tfl.gov.uk>
Sent: 20 November 2020 13:51
To: Allison De Marco <[REDACTED]@enfield.gov.uk>
Cc: Matthew Sharpe <[REDACTED]@quod.com>; Susie Byrne <[REDACTED]@quod.com>; Brown Mary <[REDACTED]@tfl.gov.uk>; Rebecca Crow <[REDACTED]@graingerplc.co.uk>
Subject: RE: Arnos Grove

Allison

Yes – we typically do this on all planning applications. I am just checking for the final version for Arnos as I recall there were some delays due to resourcing within our Equalities team.

Best

Lee

From: Allison De Marco <[REDACTED]@enfield.gov.uk>
Sent: 20 November 2020 12:00
To: Campbell Lee <[REDACTED]@tfl.gov.uk>
Cc: Matthew Sharpe <[REDACTED]@quod.com>; Susie Byrne <[REDACTED]@quod.com>; Brown Mary <[REDACTED]@tfl.gov.uk>
Subject: Arnos Grove

Hi Lee,

Can TfL please confirm it undertook an EQIA as part of its site selection, approvals or other processes developing the scheme.

Thanks,
Allison

Allison De Marco MRTPI
Planning Decisions Manager – Strategic Applications
Planning Service
Place Department
Enfield Council

E: [REDACTED] [enfield.gov.uk](mailto:[REDACTED]@enfield.gov.uk)
W: www.enfield.gov.uk



[Follow us on Facebook](#) [Twitter](#) www.enfield.gov.uk

Enfield Council is committed to serving the whole borough fairly, delivering excellent services and building strong communities. Opinions expressed in this email are those of the individual and not necessarily those of the London Borough of Enfield. This email and any attachments or files transmitted with it are strictly confidential and intended solely for the named addressee. It may contain privileged and confidential information and if you are not the intended recipient and receive it in error you must not copy, distribute or use the communication in any other way. All traffic handled by the Government Connect Secure Extranet may be subject to recording/and or monitoring in accordance with relevant legislation.

This email has been scanned for viruses but we cannot guarantee that it will be free of viruses or malware. The recipient should perform their own virus checks.

Disclaimer

The information contained in this communication from the sender is confidential. It is intended solely for use by the recipient and others authorized to receive it. If you are not the recipient, you are hereby notified that any disclosure, copying, distribution or taking action in relation of the contents of this information is strictly prohibited and may be unlawful.

This email has been scanned for viruses and malware, and may have been automatically archived by **Mimecast Ltd**, an innovator in Software as a Service (SaaS) for business. Providing a **safer** and **more useful** place for your human generated data. Specializing in; Security, archiving and compliance. To find out more [Click Here](#).

The contents of this e-mail and any attached files are confidential. If you have received this email in error, please notify us immediately at postmaster@tfl.gov.uk and remove it from your system. If received in error, please do not use, disseminate, forward, print or copy this email or its content. Transport for London excludes any warranty and any liability as to the quality or accuracy of the contents of this email and any attached files.

Transport for London is a statutory corporation whose principal office is at 5 Endeavour Square, London, E20 1JN. Further information about Transport for London's subsidiary companies can be found on the following link: <http://www.tfl.gov.uk/corporate/about-tfl/>

Although TfL have scanned this email (including attachments) for viruses, recipients are advised to carry out their own virus check before opening any attachments, as TfL accepts no liability for any loss, or damage which may be caused by viruses.



[Follow us on Facebook](#) [Twitter](#) www.enfield.gov.uk

Enfield Council is committed to serving the whole borough fairly, delivering excellent services and building strong communities. Opinions expressed in this email are those of the individual and not necessarily those of the London Borough of Enfield. This email and any attachments or files transmitted with it are strictly confidential and intended solely for the named addressee. It may contain privileged and confidential information and if you are not the intended recipient and receive it in error you must not copy, distribute or use the communication in any other way. All traffic handled by the Government Connect Secure Extranet may be subject to recording/and or monitoring in accordance with relevant legislation.

This email has been scanned for viruses but we cannot guarantee that it will be free of viruses or malware. The recipient should perform their own virus checks.



[Follow us on Facebook](#) [Twitter](#) www.enfield.gov.uk

Enfield Council is committed to serving the whole borough fairly, delivering excellent services and building strong communities. Opinions expressed in this email are those of the individual and not necessarily those of the London Borough of Enfield. This email and any attachments or files transmitted with it are strictly confidential and intended solely for the named addressee. It may contain privileged and confidential information and if you are not the intended recipient and receive it in error you must not copy, distribute or use the communication in any other way. All traffic handled by the Government Connect Secure Extranet may be subject to recording/and or monitoring in accordance with relevant legislation.

This email has been scanned for viruses but we cannot guarantee that it will be free of viruses or malware. The recipient should perform their own virus checks.



[Follow us on Facebook](#) [Twitter](#) www.enfield.gov.uk

Enfield Council is committed to serving the whole borough fairly, delivering excellent services and building strong communities. Opinions expressed in this email are those of the individual and not necessarily those of the London Borough of Enfield. This email and any attachments or files transmitted with it are strictly confidential and intended solely for the named addressee. It may contain privileged and confidential information and if you are not the intended recipient and receive it in error you must not copy, distribute or use the communication in any other way. All traffic handled by the Government Connect Secure Extranet may be subject to recording/and or monitoring in accordance with relevant legislation.

This email has been scanned for viruses but we cannot guarantee that it will be free of viruses or malware. The recipient should perform their own virus checks.

Jacob Gemma

From: Campbell Lee
Sent: 23 November 2020 11:20
To: Allison De Marco; Rebecca Crow; Brown Mary
Subject: RE: Arnos Grove

Allison – can you send us the draft condition wording around station access road as mentioned below.

Lee

From: Allison De Marco <[REDACTED]@enfield.gov.uk>
Sent: 23 November 2020 10:56
To: Campbell Lee <[REDACTED]@tfl.gov.uk>; Rebecca Crow <[REDACTED]@graingerplc.co.uk>; Brown Mary <[REDACTED]@tfl.gov.uk>
Subject: RE: Arnos Grove

Let's speak briefly now – and then again at 12.

Allison De Marco MRTPI
Planning Decisions Manager – Strategic Applications
Planning Service
Place Department
Enfield Council

E: [REDACTED]@enfield.gov.uk
W: www.enfield.gov.uk

From: Campbell Lee <[REDACTED]@tfl.gov.uk>
Sent: 23 November 2020 10:49
To: Rebecca Crow <[REDACTED]@graingerplc.co.uk>; Allison De Marco <[REDACTED]@enfield.gov.uk>; Brown Mary <[REDACTED]@tfl.gov.uk>
Subject: RE: Arnos Grove

Hi Allison – we have some time now – or at 12. Please let us know what suits best. If you want to do now I can join my 11am meeting late.

Best

Lee

From: Rebecca Crow <[REDACTED]@graingerplc.co.uk>
Sent: 23 November 2020 10:45
To: Campbell Lee <[REDACTED]@tfl.gov.uk>; Allison De Marco <[REDACTED]@enfield.gov.uk>; Brown Mary <[REDACTED]@tfl.gov.uk>
Subject: RE: Arnos Grove

Hi,

This works for me, I am free of meetings today.

Thanks

From: Campbell Lee <[REDACTED]@tfl.gov.uk>
Sent: 23 November 2020 10:34

To: Allison De Marco <[REDACTED]@enfield.gov.uk>; Brown Mary <[REDACTED]@tfl.gov.uk>; Rebecca Crow <[REDACTED]@graingerplc.co.uk>
Subject: RE: Arnos Grove

(CAUTION: External Email).

Thanks Allison - I am free until 11am and then from 12?

Rebecca? Mary?

Lee

From: Allison De Marco <[REDACTED]@enfield.gov.uk>
Sent: 23 November 2020 10:29
To: Campbell Lee <[REDACTED]@tfl.gov.uk>; Brown Mary <[REDACTED]@tfl.gov.uk>; Rebecca Crow <[REDACTED]@graingerplc.co.uk>
Subject: RE: Arnos Grove

Would be helpful to talk this morning if you have some time?

Thank you,
Allison

Allison De Marco MRTPI
Planning Decisions Manager – Strategic Applications
Planning Service
Place Department
Enfield Council

E: [REDACTED]@enfield.gov.uk
W: www.enfield.gov.uk



Enfield Council is committed to serving the whole Borough fairly, delivering excellent services and building strong communities

Please do not print this e-mail unless necessary – Help save the planet

From: Campbell Lee <[REDACTED]@tfl.gov.uk>
Sent: 23 November 2020 10:16
To: Allison De Marco <[REDACTED]@enfield.gov.uk>; Brown Mary <[REDACTED]@tfl.gov.uk>; Rebecca Crow <[REDACTED]@graingerplc.co.uk>
Subject: RE: Arnos Grove

Thanks Allison – we will have a quick look through this this morning.

Lee

From: Allison De Marco <[REDACTED]@enfield.gov.uk>
Sent: 20 November 2020 20:01
To: Brown Mary <[REDACTED]@tfl.gov.uk>; Campbell Lee <[REDACTED]@tfl.gov.uk>
Subject: RE: Arnos Grove

Mary and Lee,

I have provided updated wording below based on the enhanced offer. I am still working on the update report as we are receiving representations. We do however aim to send this out today.

On the basis that: S278 works are not capped for necessary highway improvements.

And DEN connection is agreed in line with the draft s106 wording I shared on Monday, we would accept the revised offer.

Section 2 of the Committee Report: Update

1.1 An update on the main report Heads of Terms is set out below at paragraph 1.2. In summary, Officers have secured Section 106 contributions of **£391,142** (including £180,700 towards transport and £70,957 towards health). In addition, Community Infrastructure Levy in the order of **£1,765,181** would be payable (*page 174 of the committee report*).

1.2 **Heads of Terms:**

1. Affordable housing:

- a. Minimum of 40% by habitable room (39.5% based on units);
 - a. Tenure to comprise 30% let at London Living Rent levels and 70% Discounted Market Rent;
- b. Rents set up to 65-70% of open market rent rates subject to the GLA's household income cap in place at the time of letting;
- c. Marketing of **affordable Shared Ownership** homes – prioritising households that live or work in the Borough;
- d. All related communal open space and play space in a particular Block or Plot to be available to all residents (irrespective of tenure);
- e. Quality standards;
- f. Affordable housing secured in perpetuity.

2. Viability Review Mechanisms:

- a. Early Stage Review (if no "substantial commencement" within 24 months);
- b. Late Stage Review (prior to 75% of private residential units being sold or let); and
- c. Early and Late Stage Reviews capped at 40% Affordable Housing ((30% London Living Rent (LLR) and 70% Discounted Market Rent (DMR)).

3. Build to Rent requirements:

- a. 15-year minimum covenant;
- b. Clawback clause;
- c. Self-contained and let separately;
- d. Unified management and ownership;
- e. Tenancies of up to 5-years available to all;
- f. Rent and service charge certainty for the length of the tenancy;
- g. On-site management;
- h. Complaints service in place; and
- i. No up-front charges etc.

4. Sustainable Transport Package (up to **£45,700**):

Allocation scope potential:

- a. Car Club Membership per home for 3 years; £50 car club driving credit per home; £50 Oyster OR Cycle Voucher.
 - b. Travel Plan monitoring (£5,500), including a Travel Plan to be prepared and implemented; commitment to review; appointment of Travel Plan Coordinator and monitoring of Travel Plan initiatives including TRICS compliant surveys.
5. Sustainable Transport Infrastructure (Healthy Streets and Improvements) (£95,000):
Allocation scope potential:
- a. Local pedestrian, cycle and highway infrastructure beyond the red line;
 - b. Surveys (informing the need for local improvements such as a pedestrian crossing along Bowes Road; drop off-surveys; local Pedestrian / cycle Infrastructure Surveys) – with link to s278;
6. Local Car Parking Controls: Management and Monitoring (£40,000):
- a. A contribution towards monitoring and consultation on an extension to the CPZ near the development
 - b. Local parking consultation and extension: If post occupancy surveys show impacts with the existing CPZ, then funds provided for consultation on potential extension (to be agreed).
7. New Resident Parking Exemption
- a. Resident car ownership would be managed by the developer, including a clause within resident contracts restricting them from applying for or being eligible for on-street parking permits within the relevant Controlled Parking Zone.
 - b. The CPZ exemption will be secured via the S106 agreement using powers under S16 of the Greater London Council (General Powers) Act 1974
8. Station Access Road
- a. Improvements associated with the development of the site, within the red line boundary implemented through Section 278.
 - b. Alterations to site accesses / works to site frontage along the highway.
9. Energy
- a. Priority DEN connection;
 - b. Development to provide no less than a 35% improvement in total CO² emissions arising from the operation of the development and its services over Part L of Building Regs 2013.
 - c. Revised Energy Statement to be submitted;
 - d. Be Seen (Post construction monitoring). Post construction monitoring as per 'be seen' guidance.
10. Carbon Offsetting financial contribution:
- a. Payment of off-set contribution (£139,847 linked to 9.a);
 - b. Sign up to GLA energy monitoring platform.
11. Health financial contribution:
- a. Payment of contribution (£70,957);
12. Employment & Training:
- a. Local Labour (during construction phase); and
 - b. Employment & Skills Strategy submitted and approved prior to commencement of Phase 1 and each Plot in Phase 2 using reasonable endeavours to secure: (i). 25% of local workforce, (ii). 1 x apprentice or trainee for every £Xm contract value (figure to be agreed once formula agreed) (financial contribution to be provided if not possible formula to be agreed), (iii). Quarterly apprenticeship reporting & targets, (iv). Local goods and materials, and (v). partnership working with local providers/ programmes).
13. Public Realm
- a. Public Realm Use and maintenance of the square – to be delivered as a publicly accessible space and maintained by the developer

b. Public access – ensuring public access to proposed square (365 days, 24/7).

14. Play Space

a. Play space provided on site shall be accessible to all housing tenures.

15. Architect Retention Clause

a. Retention of architects

16. Other:

- a. Financial contributions to be index-linked;
- b. Considerate Constructors Scheme;
- c. LBE monitoring fee (max 5% of financial contributions);
- d. s278 agreement in line with specification to be agreed, subject to surveys.

1.3 Condition 31 (Fire Evacuation Lifts) is **amended to** (Submission of Evacuation Management plan and lift details). Fire evacuation lifts will be provided in each building, subject to development of a suitable management evacuation plan.

1.4 Condition 37 (Station Access Road works) is **added**.

Section 9 of the Committee Report: Summary or relevant assessment

1.5 A representation has been received raising concerns that Enfield Council has not considered its obligations under the Equality Act (2010) and in particular the Public Service Equality Duty (PSED) in considering the differential and negative impacts on older people, and those with mobility impairments who do not possess a blue badge (but who might make use of the TaxiCard scheme, for example). A similar comment has been made in respect of Transport for London's obligations.

1.6 The PSED is engaged when making a planning decision and in this case, respect of age and disability are the key characteristic relevant to the loss of parking. The report is clear there is no change to the number of blue badge parking associated with the station (6 spaces re-provided), there is good public transport connectivity and re-provided taxi provision. Arnos Grove station does not provide 'Step-free access from street to train' or 'Step-free access from street to platform'. 'Step-free access from street to train' is available two stations north along the Piccadilly Line, at Oakwood Station. Oakwood Station has a car park.

1.7 The report sets out Officers' detailed assessment of the overall impacts of the scheme's prioritisation of walking, cycling and low carbon transport. The report concludes there are benefits for existing station users and existing and future residents in creating a safer environment. It also considers potential improvements to local air quality. Officers concluded that impacts of the loss of the public car park are, on balance, acceptable subject to appropriate mitigation (page 154). The benefits and mitigations in summary include the following:

- 6 x blue badge parking spaces are re-provided, and quality of access to these bays improved (*main report pages 153, 156 and condition no. 35*);
- taxi stand re-provision (*main report pages 153, 158 and condition no. 35*);
- benefits resulting from key improvements of the new square with additional seating, shade, shelter, places to rest and cycle parking (*main report pages 71, 87, 91, 137, 157 and 159*);
- the scheme will promote feelings of increased community safety and security through increased activity, new permanent active uses and increased footfall (*main report page 126*);
- Conditions and Section 106 obligations, including contributions towards local transport improvements (*Paragraph 1.2 above*).

1.8 Officers are satisfied the assessment; applicant's design and development approach and the application material have taken the provisions of the Human Rights Act 1998 into account in the

processing of the application and the preparation of the main report, and this update report. Members will be required to pay due regard to the need to: eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act; advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and foster good relations between peoples who share a relevant protected characteristic and persons who do not share it. A summary against the assessment within the main report is summarised below:

- 1.9 *Age*: Safer environments in which to walk, play and cycle predominantly have a positive effect on younger and older age groups where motor vehicle ownership is low. Page 154 notes that 33% of Enfield households have no access to a car. Local data shows a higher percentage of local households do not have a car compared with the Enfield average. In this context, public transport and active modes of travel have increased importance as a result. Improvements that support active travel would have beneficial impacts.
- 1.10 *Disability*: Disabled people are highly diverse in their capabilities and within the disabled context there are several sub groups, considered against the assessment undertaken in the Officers Report and summarised above.
- 1.11 *Physical Impairments*: Those with physical impairments are more likely to use public transport or rely on vehicles for mobility. While there may be an impact on individuals who primarily use a motor vehicle as a mobility aid – an alternative local option to a step-free station (with better step-free arrangements) remains available two stops north. Wheels for Wellbeing is a grassroots disability organisation and inclusive cycling charity based in London. It publishes guidance on inclusive cycling which notes that it is a ‘common myth that Disabled people don’t or can’t cycle. According to Transport for London (TfL), in London alone 12% of Disabled people cycle regularly or occasionally, compared to 17% of non-Disabled people’. The scheme includes public cycle parking provision – with no loss proposed. This would have a neutral impact on disabled people who cycle.
- 1.12 Where mobility is impaired, this can make walking or crossing more complex for people and they may take longer to cross. If traffic reductions were experienced, which is expected, then these lower traffic volumes are likely to benefit people who need more time to cross. Officers have secured a package of mitigations, to support local transport improvements.
- 1.13 *Visual Impairment*: Visually impaired people will be pedestrians, users of public transport or passengers in other vehicles. Visually impaired are likely to benefit from decreased traffic flows and enhancements to public realm, although the initial change could be confusing.
- 1.14 *Learning Difficulties and Developmental Disorders*: These community members may struggle to process changes to their daily life such as a route they regularly walk with a different flow of traffic. The applicant will be required to manage construction and submit a Construction Logistics Management Plan – which would include managing communications in respect of the development. There is a local school in the area which hosts SEN children and has an ARP for pupils with autism. There may be a positive impact on children who currently walk and cycle – if the scheme reduces traffic in the area, which is expected.
- 1.15 An Equality Impact Assessment was undertaken by Transport for London for the Arnos Grove project.

Allison De Marco MRTPI
Planning Decisions Manager – Strategic Applications
Planning Service
Place Department
Enfield Council

E: [REDACTED] [enfield.gov.uk](mailto:[REDACTED]@enfield.gov.uk)

W: www.enfield.gov.uk

From: Brown Mary <[REDACTED]@tfl.gov.uk>
Sent: 20 November 2020 14:48
To: Allison De Marco <[REDACTED]@enfield.gov.uk>
Cc: Campbell Lee <[REDACTED]@tfl.gov.uk>
Subject: RE: Arnos Grove

Hi Allison,

I can confirm that an Equality Impact Assessment has been undertaken for the Arnos Grove project. This was reviewed and signed off by TfL's Diversity and Inclusion Team, in line with TfL's Management System for projects.

On a separate note, I wondered whether you have had an opportunity to review the revised S106 contributions discussed yesterday, and whether you have any further comments on these ahead of Tuesday's committee please?

Many thanks,

Mary

Mary Brown MRTPI

Planning Manager – Build to Rent | Property Development

Mobile: [REDACTED]

1st Floor, 31 Borough High Street, London SE1 1LY | [REDACTED]@tfl.gov.uk

From: Campbell Lee <[REDACTED]@tfl.gov.uk>
Sent: 20 November 2020 14:38
To: Allison De Marco <[REDACTED]@enfield.gov.uk>
Cc: Brown Mary <[REDACTED]@tfl.gov.uk>
Subject: RE: Arnos Grove

Mary will confirm asap.

Lee

From: Allison De Marco <[REDACTED]@enfield.gov.uk>
Sent: 20 November 2020 14:37
To: Campbell Lee <[REDACTED]@tfl.gov.uk>
Subject: RE: Arnos Grove

Thanks Lee.

Grateful if confirmation could be provided by close today.

Allison

Allison De Marco MRTPI

Planning Decisions Manager – Strategic Applications

Planning Service

Place Department

Enfield Council

E: [REDACTED]@enfield.gov.uk

W: www.enfield.gov.uk

From: Campbell Lee <[REDACTED]@tfl.gov.uk>
Sent: 20 November 2020 13:51
To: Allison De Marco <[REDACTED]@enfield.gov.uk>
Cc: Matthew Sharpe <[REDACTED]@quod.com>; Susie Byrne <[REDACTED]@quod.com>; Brown Mary <[REDACTED]@tfl.gov.uk>; Rebecca Crow <[REDACTED]@graingerplc.co.uk>
Subject: RE: Arnos Grove

Allison

Yes – we typically do this on all planning applications. I am just checking for the final version for Arnos as I recall there were some delays due to resourcing within our Equalities team.

Best

Lee

From: Allison De Marco <[REDACTED]@enfield.gov.uk>
Sent: 20 November 2020 12:00
To: Campbell Lee <[REDACTED]@tfl.gov.uk>
Cc: Matthew Sharpe <[REDACTED]@quod.com>; Susie Byrne <[REDACTED]@quod.com>; Brown Mary <[REDACTED]@tfl.gov.uk>
Subject: Arnos Grove

Hi Lee,

Can TfL please confirm it undertook an EQIA as part of its site selection, approvals or other processes developing the scheme.

Thanks,
Allison

Allison De Marco MRTPI
Planning Decisions Manager – Strategic Applications
Planning Service
Place Department
Enfield Council

E: [REDACTED]@enfield.gov.uk
W: www.enfield.gov.uk



[Follow us on Facebook](#) [Twitter](#) www.enfield.gov.uk

Enfield Council is committed to serving the whole borough fairly, delivering excellent services and building strong communities. Opinions expressed in this email are those of the individual and not necessarily those of the London Borough of Enfield. This email and any attachments or files transmitted with it are strictly confidential and intended solely for the named addressee. It may contain privileged and confidential information and if you are not the intended recipient and receive it in error you must not copy,

distribute or use the communication in any other way. All traffic handled by the Government Connect Secure Extranet may be subject to recording/and or monitoring in accordance with relevant legislation.

This email has been scanned for viruses but we cannot guarantee that it will be free of viruses or malware. The recipient should perform their own virus checks.

Disclaimer

The information contained in this communication from the sender is confidential. It is intended solely for use by the recipient and others authorized to receive it. If you are not the recipient, you are hereby notified that any disclosure, copying, distribution or taking action in relation of the contents of this information is strictly prohibited and may be unlawful.

This email has been scanned for viruses and malware, and may have been automatically archived by **Mimecast Ltd**, an innovator in Software as a Service (SaaS) for business. Providing a **safer** and **more useful** place for your human generated data. Specializing in; Security, archiving and compliance. To find out more [Click Here](#).

The contents of this e-mail and any attached files are confidential. If you have received this email in error, please notify us immediately at postmaster@tfl.gov.uk and remove it from your system. If received in error, please do not use, disseminate, forward, print or copy this email or its content. Transport for London excludes any warranty and any liability as to the quality or accuracy of the contents of this email and any attached files.

Transport for London is a statutory corporation whose principal office is at 5 Endeavour Square, London, E20 1JN. Further information about Transport for London's subsidiary companies can be found on the following link: <http://www.tfl.gov.uk/corporate/about-tfl/>

Although TfL have scanned this email (including attachments) for viruses, recipients are advised to carry out their own virus check before opening any attachments, as TfL accepts no liability for any loss, or damage which may be caused by viruses.



[Follow us on Facebook](#) [Twitter](#) www.enfield.gov.uk

Enfield Council is committed to serving the whole borough fairly, delivering excellent services and building strong communities. Opinions expressed in this email are those of the individual and not necessarily those of the London Borough of Enfield. This email and any attachments or files transmitted with it are

strictly confidential and intended solely for the named addressee. It may contain privileged and confidential information and if you are not the intended recipient and receive it in error you must not copy, distribute or use the communication in any other way. All traffic handled by the Government Connect Secure Extranet may be subject to recording/and or monitoring in accordance with relevant legislation.

This email has been scanned for viruses but we cannot guarantee that it will be free of viruses or malware. The recipient should perform their own virus checks.



[Follow us on Facebook](#) [Twitter](#) www.enfield.gov.uk

Enfield Council is committed to serving the whole borough fairly, delivering excellent services and building strong communities. Opinions expressed in this email are those of the individual and not necessarily those of the London Borough of Enfield. This email and any attachments or files transmitted with it are strictly confidential and intended solely for the named addressee. It may contain privileged and confidential information and if you are not the intended recipient and receive it in error you must not copy, distribute or use the communication in any other way. All traffic handled by the Government Connect Secure Extranet may be subject to recording/and or monitoring in accordance with relevant legislation.

This email has been scanned for viruses but we cannot guarantee that it will be free of viruses or malware. The recipient should perform their own virus checks.



[Follow us on Facebook](#) [Twitter](#) www.enfield.gov.uk

Enfield Council is committed to serving the whole borough fairly, delivering excellent services and building strong communities. Opinions expressed in this email are those of the individual and not necessarily those of the London Borough of Enfield. This email and any attachments or files transmitted with it are strictly confidential and intended solely for the named addressee. It may contain privileged and confidential information and if you are not the intended recipient and receive it in error you must not copy, distribute or use the communication in any other way. All traffic handled by the Government Connect Secure Extranet may be subject to recording/and or monitoring in accordance with relevant legislation.

This email has been scanned for viruses but we cannot guarantee that it will be free of viruses or malware. The recipient should perform their own virus checks.

This email and any attachments to it are strictly confidential and intended solely for the addressee. If you are not the intended addressee you must not disclose, forward, copy or take action in reliance of this email or any attachments.

If you have received this email in error please notify us as soon as possible.

The addressee[s] shall not forward, disclose or copy this email or attachments to any third party without the prior consent of the sender. Access to this email by anyone else is unauthorised.

This email and any attachments to it are not intended to create potential relations, or legal obligations binding on the company and no action may be taken in reliance of this email and any attachments to it unless the contents are confirmed by letter.

The views expressed in this email and any attachments to it are personal and unless stated explicitly do not represent the views of the company.

The company excludes all liability in respect of this email and the attachments to it to the fullest extent permitted by law.

The addressee should check all attachments for viruses. The company makes no representation as regards the absence of viruses in attachments to this email.

Place of Registration : England and Wales

Reg No of Grainger plc : 00125575

Reg Office : Citygate, St. James' Boulevard, Newcastle NE1 4JE



[Follow us on Facebook](#) [Twitter](#) www.enfield.gov.uk

Enfield Council is committed to serving the whole borough fairly, delivering excellent services and building strong communities. Opinions expressed in this email are those of the individual and not necessarily those of the London Borough of Enfield. This email and any attachments or files transmitted with it are strictly confidential and intended solely for the named addressee. It may contain privileged and confidential information and if you are not the intended recipient and receive it in error you must not copy, distribute or use the communication in any other way. All traffic handled by the Government Connect Secure Extranet may be subject to recording/and or monitoring in accordance with relevant legislation.

This email has been scanned for viruses but we cannot guarantee that it will be free of viruses or malware. The recipient should perform their own virus checks.

Jacob Gemma

From: Allison De Marco <[REDACTED]@enfield.gov.uk>
Sent: 04 January 2021 17:32
To: Brown Mary; Campbell Lee; Rebecca Crow; Matthew Sharpe; Susie Byrne
Subject: RE: Arnos Grove: Planning Committee re 5/1/21
Attachments: Update Note for Members - Planning Committee 5th January 2021.pdf

Dear Mary, Lee, Rebecca, Matthew and Susie,

Please find attached an update note circulated to Members today.

Kind regards,
Allison

Allison De Marco MRTPI
Planning Decisions Manager – Strategic Applications
Planning Service
Place Department
Enfield Council

E: [REDACTED]@enfield.gov.uk
W: www.enfield.gov.uk

From: Allison De Marco
Sent: 31 December 2020 16:46
To: Brown Mary <[REDACTED]@tfl.gov.uk>; Campbell Lee <[REDACTED]@tfl.gov.uk>; Rebecca Crow <[REDACTED]@graingerplc.co.uk>; Matthew Sharpe <[REDACTED]@quod.com>; Susie Byrne <[REDACTED]@quod.com>
Subject: Arnos Grove: Planning Committee re 5/1/21

Dear Mary, Lee, Rebecca, Matthew and Susie,

I hope you have had a good break.

I have attached recent additional representations in respect of the upcoming planning committee on 5th January 2021.

In summary since the report was completed and published, the following have been received:

- 1 x representation from a **member of the public objecting**: 31 December 2020 (not attached);
- 1 x further representation from **Enfield Town Residents Association objecting**: 24 December 2020 (attached);
- 2 x further representations from **Cockfosters Local Area Residents Association objecting**: 24 December 2020 (attached) and 18 December (attached).

Kind regards,
Allison

Allison De Marco MRTPI
Planning Decisions Manager – Strategic Applications
Planning Service
Place Department
Enfield Council

E: [redacted]@enfield.gov.uk
W: www.enfield.gov.uk

From: Andy Higham
Sent: 30 December 2020 10:08
To: Allison De Marco <[redacted]@enfield.gov.uk>
Subject: FW: Letter to the Planning Committee re 5/1/21 - Ref 20/01049/FUL [SEC=OFFICIAL]

Classification: OFFICIAL

FYI



[Follow us on Facebook](#) [Twitter](#) www.enfield.gov.uk

Enfield Council is committed to serving the whole borough fairly, delivering excellent services and building strong communities. Opinions expressed in this email are those of the individual and not necessarily those of the London Borough of Enfield. This email and any attachments or files transmitted with it are strictly confidential and intended solely for the named addressee. It may contain privileged and confidential information and if you are not the intended recipient and receive it in error you must not copy, distribute or use the communication in any other way. All traffic handled by the Government Connect Secure Extranet may be subject to recording/and or monitoring in accordance with relevant legislation.

This email has been scanned for viruses but we cannot guarantee that it will be free of viruses or malware. The recipient should perform their own virus checks.

Disclaimer

The information contained in this communication from the sender is confidential. It is intended solely for use by the recipient and others authorized to receive it. If you are not the recipient, you are hereby notified that any disclosure, copying, distribution or taking action in relation of the contents of this information is strictly prohibited and may be unlawful.

This email has been scanned for viruses and malware, and may have been automatically archived by **Mimecast Ltd**, an innovator in Software as a Service (SaaS) for business. Providing a **safer** and **more useful** place for your human generated data. Specializing in; Security, archiving and compliance. To find out more [Click Here](#).



**LBE Planning Application Number:
20/01049/FUL**

**Car park adjacent to Arnos Grove Station,
Bowes Road N11 1AN**

18 December 2020, update to report of 23 November 2020

INTRODUCTION

- 1 The proposed development raises:
 - (a) Important issues under the Equality Act 2010, issues that go the very heart of Enfield's 'Fairer Enfield' policy: car parks are particularly important for people with protected characteristics (age, disability, pregnancy & maternity) to access the Tube network; and
 - (b) Real concerns about the affordability of the rent levels proposed.

EQUALITY ACT 2010 AND THE PUBLIC SECTOR EQUALITY DUTY

- 2 Both TfL and the Council are subject to the Public Sector Equality Duty (PSED) imposed by s.149. This requires public sector authorities to have 'due regard' to the need to 'advance equality of opportunity' between persons who share a relevant protected characteristic and persons who do not share it.

DUE REGARD UNDER THE ACT

- 3 'Due regard' is a positive duty. This means that 'due regard' must be at the heart of the decision-making process and information must be actively sought before coming to a decision, for example by consulting with effected parties.
- 4 It appears that no such consultation has been undertaken by either Officers or the Applicant.
- 5 It is not lawful to make a decision and subsequently seek to justify it. Nor can the Duty be delegated to an Applicant. Officers have stated that the Applicant completed an Equality Impact Assessment (EIA) without producing evidence of it or any evidence of due diligence that they may have conducted in relation to it.
- 6 If this application is approved without the Officers conducting their own EIA and the committee interrogating it, Enfield would be in **breach of the 2010 Act** and subject to referral to the Equalities and Human Rights Commission.

ADVANCE EQUALITY NOT MITIGATE HARM

- 7 The Act requires a public sector body to 'advance equality'. Mitigating harm is insufficient, positive action to improve the situation is required.
- 8 It is clear that the position of people with a relevant protected characteristic will be worsened, not improved, if the car park is closed.

THE APPLICATION AND THE ACT

- 9 Under the proposed scheme, instead of having 297 general and six Blue Badge parking spaces, there will only be **six Blue Badge spaces**. As Blue Badge spaces are only available to people with chronic mobility problems, these proposals **fail to provide equal treatment** for all the people with protected characteristics who use the car park.

- 10 The applicant argues that they have retained the Blue Badge spaces to address this. However, preserving the *status quo* is not advancing 'equality of opportunity'. Six Blue Badge spaces will fail to address the needs of the aged, pregnant women, and those with children who will not be able to be dropped off in future by family and friends as no 'drop-off' has been incorporated in the design of the development.
- 11 Indeed, the retention of six Blue Badge spaces does not even fully address the needs of Blue Badge holders. Disabled people need a high degree of certainty when they embark on a journey, as their ability to be flexible when faced with an unexpected travel problem is less than that of others. Currently, if they travel to the station by car and all the Blue Badge spaces are full, they have the option of parking in a regular parking space. They will have no such option in the proposed scheme.
- 12 TfL has embarked on a programme of repurposing its 'Park & Ride' facilities. They have announced 15 initial sites. The Committee should note that TfL's three applications in the LB Harrow, all in partnership with Catalyst Housing (a housing association, not a private sector property developer), retain substantial car parking: at Canons Park 60 spaces + four Blue Badge spaces; at Stanmore 300 spaces in new underground parking + 12 Blue Badge spaces; and at Rayners Lane 75 spaces + six Blue Badge spaces. Note also that units in the 'Catalyst' developments will be **100% affordable**. The Committee is asked to consider why the TfL's approach in Harrow is so different.

DISINGENUOUS REPORTING

- 13 The Officers' report is disingenuous and misleading. It states that alternative disabled parking spaces are available at Cockfosters and Oakwood. Officers are well aware that there is a pending application to develop Cockfosters Station car park, one of the 15 developments planned by TfL. As is public knowledge, TfL is evaluating the future of all its 79 car parks, including the one at Oakwood Station.
- 14 Further, It is discriminatory to force people with protected characteristics to travel farther to a station in a more expensive Travel Zone and with a longer travel time into town.

CASE LAW

- 15 There is case law supporting our objection. In *LDRA Ltd & ors v. SSCLG* (2016), a judicial review of a planning appeal on the development of a car park, it was held that the Planning Inspector did not have due regard to the effect of the closure of the car park on the ability of disabled people to access a local amenity. Key findings in this case were:
 - The inspector failed to record the steps he had taken to meet his statutory duty.
 - The Minister must assess the risk and adverse impact.
 - Public authorities must be properly informed before taking a decision.
 - 'The 2010 Act imposes a heavy duty on public authorities ...'

UNAFFORDABLE HOMES

- 16 Enfield Council places great importance on the provision of homes that meet the needs of the borough's less well-off residents, both in terms of quality and affordability. **This scheme wholly fails to meet those needs.**

HOUSING MIX

- 17 The scheme provides a very large proportion of one- and two-bedroomed units instead of addressing the Borough's need for family homes. Table 1 sets out the extent of this failure.

AFFORDABILITY

- 18 The Applicant claims that it will provide 40% affordable homes: this should be **50%** as the scheme is on public land. As we argue below, the homes to be provided have projected rent levels that are **far higher** than Enfield households on median net income or below can afford.
- 19 We set out the rent levels quoted by the Applicant in its own Viability Assessment, compared to the various affordable rent levels in Table 2. **The differences are stark.**
- 20 The truth is that the Scheme provides:
- **No homes** at Social or London Affordable Rents
 - **11.7%** homes at London Living Rents, intended for Londoners on middle-incomes.
 - **27.8%** homes at discounted rents – higher than the maximum level for intermediate rent levels. As these homes will be let at rents above the maximum for affordable rents, they are clearly not affordable.
- 21 The flats in this proposed development **would all be unaffordable for the majority of Enfield residents, let alone lower income households.**

QUALITY

- 22 Enfield's need is overridingly for family homes. Of the 162 units proposed, only **14** (8.6%) are 3-bedroom units and none are larger. Furthermore, the Development provides unacceptably small amenity space.

TENURE BLIND

- 23 It is shocking to see that all the so-called **affordable units are segregated into a single building**, A02. The segregation is total; there are no affordable units in the other buildings and there are no market units in A02. Note also that building A02 is the tallest in the proposed scheme and includes all the 'family' units.
- 24 There has been no attempt to make the scheme 'tenure blind'. One of the benefits envisaged by the Mayor of Build-to-Rent schemes (Homes for Londoners SPG: para 4.21) is that 'units can be more easily be tenure blind and be 'pepper potted' through the development.' This Application contravenes both Enfield's and the Mayor's guidance.

TABLE 1: ARNOS GROVE – PROPOSED DEVELOPMENT MIX

25 This shows the Applicant’s proposed mix of units compared with Enfield’s recommended mix. **The differences, quantified in the final part of the table, are stark.** For example, there are 56 fewer units at social rent level than Enfield’s recommended mix. There are, in fact, no units at a social rent level.

Proposed development mix	1b2p	2b3p	2b4p	3b5p	4+	No of units	% of units
Market rent	44	3	51	0	0	98	60.5%
Discounted Market Rent	28	3	4	10	0	45	27.8%
London Living rent	12	2	1	4	0	19	11.7%
TOTAL	84	8	56	14	0	162	100%
Enfield recommended mix	1b2p	2b3p	2b4p	3b5p	4+	No of units	% of units
Market rent	16	2	12	36	16	81	50.0%
Discounted Market Rent	0	0	0	0	0	0	0.0%
London Living rent	5	1	5	7	7	25	15.4%
Social Rent	10	1	11	17	17	56	34.6%
TOTAL	31	4	28	60	40	162	100%
Difference: Proposed v. Enfield recommended	1b2p	2b3p	2b4p	3b5p	4+	No of units	
Market rent	28	1	39	-36	-16	17	
Discounted Market Rent	28	3	4	10	0	45	
London Living rent	7	1	-4	-3	-7	-6	
Social Rent	74	7	45	-3	-17	-56	

TABLE 2: ARNOS GROVE – COMPARATIVE WEEKLY RENT LEVELS

26 This shows the Applicant’s proposed rent levels compared to comparable Enfield affordable rent levels. **Again, the differences, shown in percentage terms in the final part of the table, are stark.** For example, the proposed discounted market rents are **209–240%** of the Social Rent levels and the proposed London Living Rent levels **187–194%** of the Social Rent Levels.

Proposed rent payable per week (based on applicant's viability assessment)	1b2p	2b3p	2b4p	3b5p
Market rent	£340	£404	£410	none
Discounted Market Rent	£238	£283	£287	£323
London Living rent	£213	£237	£237	£261
Comparable Enfield Affordable Rent Levels				
	1b2p	2b3p	2b4p	3b5p
Council (Social) Rent	£113.72	£123.90		£134.40
London Affordable Rent	£159.30	£168.70		£178.10
London Living Rent (Southgate Green Ward)	£214.19	£237.90		£261.70
London Living Rent (Enfield Lock)	£160.78	£178.65		£196.51
Max intermediate rent (London Plan AMR 2017/18: Oct 2019)	£222.00			
Proposed rent compared to Social Rent (%)				
	1b2p	2b3p	2b4p	3b5p
Market rent	299%	326%	331%	none
Discounted Market Rent	209%	228%	232%	240%
London Living rent	187%	191%	191%	194%

24 December 2020

To: Cllr Sinan Boztas and Members of the Planning Committee

cc: Vincent Lacovara, Andy Higham

LBE PLANNING APPLICATION NUMBER: 20/01049/FUL: CAR PARK ADJACENT TO ARNOS GROVE STATION

CONTEXT

We wrote to the Committee on 23 November and more recently on 18 December expressing our concerns with the referenced application. In particular, we focussed on Enfield's legal duty under the Equality Act 2010 (the Act) and the insufficient amount of affordable housing proposed in the Application.

Concurrent with our more recent letter, the Officers released the Equalities Impact Assessment (EqIA) for the development prepared by Transport for London (TfL) on behalf of Connected Living London. It appears that the Officers placed this document in the public domain subsequent to the previously scheduled Planning Committee Meeting on 24 November.

We can now see the lengthy Members' Document pack for the Meeting scheduled for 5 January.

PSED AND LBE COMPLIANCE

The Public Sector Equality Duty (PSED) applies to TfL as applicant but also, **indeed primarily, to LB Enfield** (the Council) as it is the latter that is providing a relevant service – the planning process.

The Council states its commitment to equality in its widest sense and one assumes that the Council has compliance procedures that evidence conformity with the requirements of the Act.

This raises the following questions.

1. When was the EqIA actually provided to the Council by TfL?
2. Were the equality issues clearly highlighted by TfL in its EqIA addressed in pre-application discussions?
3. When did officers sign off their own assessment of the equalities implications, both explicit and implicit, and is there documentation to evidence this?
4. Is there an audit trail that confirms that the Council has complied (and will comply) with its legal obligations, for example, through completed checklists or minuted records?

We understand that no EqIA was submitted with the Application documents and that Officers did not regard an EqIA as indispensable. This is surely not best practice.

TfL'S EQUALITY IMPACT ASSESSMENT

The EqIA clearly states that the scheme does indeed have adverse impacts on those with protected characteristics under the Act but TfL proposes nothing that would 'advance equality of opportunity'.

On page 10 it states *'There are however some people with barriers to travel due to age, impairments or other factors, who may have their journeys impacted more significantly by the changes. This may be due to them being less able to use alternative means of transport, or frequency of travel using local services.'*

And, on page 13, it states *'Removal of parking will be a significant impact to those who are less able to travel by other means.'*

Taken together, these statements make clear that **disabled people and others with protected characteristics under the Act will be significantly impacted by the removal of the car park.**

TfL argues only that the six existing Blue Badge spaces will be retained. Preserving the status quo is not taking 'due regard' to advance 'equality of opportunity'; rather, it **worsens the position of people with protected characteristics** under the Act.

OFFICERS' EVALUATION

The Officers' update to Committee para 2.9 'Section 9 of the Main Report: Summary or relevant assessment' discusses TfL's Equality Impact Assessment but notably **fails to take account of:**

- TfL's conclusion that 'Removal of parking will be a significant impact to those who are less able to travel by other means';
- TfL's risible statement (page 13) that 'Improvements to the public realm should benefit the large group of disabled people who walk as part of their journeys, by removing barriers to travel';
- TfL's proposal to maintain the status quo of six Blue Badge spaces.

In effect, Officers have acquiesced to TfL's fundamentally flawed impact assessment.

Indeed, Officers have also missed a glaring error and a contradiction in TfL's EqIA that affect the 'equality' of the proposal in a wider sense. In the Introduction, TfL states that:

- The development will include homes at London Living Rents (LLRs) that are 'comparative' to social rents and significantly lower than London Affordable Rents. **This is simply incorrect. LLRs are roughly double social rents.**
- The affordable housing provision will be located throughout the development. Again, this is incorrect. In the Arnos Grove development **the affordable element would be located entirely in one block** – a socially divisive 'rich door, poor door' approach.

MEMBERS' DOCUMENT PACK FOR MEETING ON 5 JANUARY

COMPLIANCE WITH THE ACT

Officers now include references to the PSED that were not included in their original report. **This does not alter the fact that the development will worsen, not improve, the position of those with protected characteristics under the Act.**

Officers have chosen to emphasise 'mitigation', debateable though that mitigation is, and have **totally ignored the Council's statutory duty to advance 'equality of opportunity'**.

Officers apparently believe that the Council 'has discharged its duty under the Act in consideration of this application' (para. 8.20.1) and summarise the Council's position in para 8.20.31.

*Members must also be mindful of the Local Planning Authorities' legal duty under the Equality Act 2010. In particular Members must pay due regard to the need to **eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act; advance equality of opportunity** between persons who share a relevant protected characteristics and persons who do not share it; and **foster good relations** between persons who share a relevant protected characteristic and persons who do not share it.*

This actually means that **Officers are unable to advise the Committee that approving the Application will NOT contravene the Act. TfL's EqIA states that the position of those with protected characteristics will be 'significantly impacted' and the Officers have NOT concluded otherwise.** They effectively conclude 'You decide'.

AFFORDABILITY

As is summarised in para. 8.2.47:

*30% of the affordable homes at Arnos Grove are proposed at rent levels equivalent to London Living Rent for the Southgate Green ward where the site is located. Officers are satisfied these units represent genuinely affordable rent units – particularly in respect of **Southgate Green** ward.*

This effectively concedes that the **rents will be unaffordable for the residents of much of Enfield**, particularly wards such as Edmonton Green, where the greatest housing need exists. Nor does it provide the percentage of family accommodation that is required.

In our paper of 18 December, we included two comparative tables to show the various home sizes in the proposed Application and the relevant rents. To reiterate, the scheme contains:

- No homes at Social Rent;
- Very few homes at London Living Rent;
- Little prospect these homes will be affordable for key workers.

SUMMARY

We have previously highlighted the very different approach that TfL has taken to its proposed developments at Stanmore, Canons Park and Rayners Lane stations. In all three developments both the needs for affordable housing and 'park & ride' would be met. Why are the Enfield proposals so very different?

This Application is a **bad deal for Enfield and the users of Arnos Grove Station**. It does not meet the Council's obligations under the Act, nor does it meet the Mayor's or the Council's targets for affordable homes.

Yours sincerely

Colin Bull, Chair CLARA



24th December 2020

Dear Councillor

RE: Proposal to build on Arnos Grove car park (20/01049/FUL) – Equalities Impact Assessment

In a supplementary report to the Planning Committee regarding Transport for London's (TfL) proposal to build on the car park currently serving Arnos Grove Underground Station Mr Higham reported (at paragraph 2.3.6) that TfL had conducted an Equalities Impact Assessment.

It later emerged that this had not been submitted as part of the application process, and therefore had not formed part of the information pack provided to Councillors as part of the application provided to them for review. It was implied that this document had, however, informed officers' decision to recommend approval of the proposal.

Subsequent requests elicited a copy of the TfL Equalities Impact Assessment report.

On inspection, it is clear that the report should have sounded alarm bells for any local authority officer who read it.

The report in fact clearly **recognises** the fact that the proposed development will create very real problems for groups of residents who, by rights, should be protected by the Equalities Act 2010 (and to which TfL, as well as LBE, are subject) and which therefore carries implications for LBE under its Public Sector Equality Duty.

The TfL assessment identifies many negative impacts of their proposal identified by TfL both during and (far more seriously) after construction is completed. We focus in this letter on the post construction impact issues set out by TfL as these are surely a **key planning approval consideration**. They include the following:

Age – the report acknowledges that Southgate has an **older population than the Borough average**. It states: *“As the scheme closes the car parks, this may have an impact upon older people who rely on private vehicles to access local services and amenities.”*

Within the section on age the report also concludes that *“Where residents can no longer arrive by car, there may be an impact on the safety, or perception of safety for younger travellers, who are more likely to feel worried about safety while travelling on public transport.”*

Disability – Disability to some extent overlaps with age, given that disabilities increase with age. In particular, and in line with what ETRA and other local organisations have pointed out, the report goes on to state that: *“there may be a particular impact for older people who do not qualify for blue badges, but still find walking longer distances or navigating public transport more difficult.”*

The Impact Assessment also notes that *“As the scheme closes the car parks, this may have an impact upon older people **who rely more on private vehicles to access local services and amenities.**”*

Gender – the report reiterates the above point regarding fears of anti-social behaviour in the context of protected characteristic ‘Gender’. The authors report that *“Where residents or visitors can no longer arrive by car, there may be an impact, or a perceived impact on safety. This would have a more significant impact on women who are more likely to change their travel plans due to concerns over safety.”* The authors note that this affects the “Entire Scheme”.

Regarding Parking and Access, the assessment reports that *“As women are more likely to be travelling with buggies and children, using public transport can be more difficult. There may therefore be more of an impact on women due to the removal of parking at the station”* This is, of course, entirely in line with the concerns we raised in our earlier submission.

Gender re-assignment – similarly to the concerns raised in the context of Gender, the report points out that removal of the car park may lead to concerns about safety and/or feelings of safety for people in the ‘gender re-assignment’ group. It states that *“Fears of intimidation and/or abuse are sometimes mentioned by LGBT Londoners as barriers for increased public transport use. LGBT Londoners may therefore experience lower perception of personal safety as a result. This may be negatively impacted by the removal of car parking, requiring people to travel by other means.”*

A similar point is made under the protected characteristic category of **‘sexual orientation’**.

None of the points subsequently raised under ‘Positive impacts’ indicate the likelihood that any of the alleged benefits of the scheme will address or indeed negate these concerns. Just one, ‘Improvements to the public realm space’, suggests that improvements *“such as better lighting, passive surveillance and increased footfall [might] contribute to a reduction in anti-social behaviour, safety and the feeling of safety”*. However, these changes are restricted to the vicinity of the station. While it might improve feelings of safety for people in these groups, **it fails to address** the far wider issue of safety while waiting at the bus stop, on the bus, or walking home along dark streets at night for members of the various protected groups.

Omissions in the report

In addition we noted the following several points that have been omitted by TfL in their analysis:

Pregnancy and maternity – we are surprised that the report does not identify issues for those who are pregnant or parents of neonates and young children (perhaps because the authors felt the issues were adequately covered under ‘Gender’). Anyone who is pregnant or who has a baby/babies or young children is particularly likely to want to travel by private transport for reasons of convenience – as the report points out, it is not easy to travel with a buggy or wheelchair on a bus. This, therefore, points to the **additional impact** on women who have babies.

In addition, women who are pregnant may also not want the additional wait and longer journey times involved in walking to a bus stop, waiting for the bus, and the increased journey time arising from using buses, with their frequent stops, rather than using a car. Not to put too fine a point on the matter, pregnancy results in significantly reduced bladder capacity¹, meaning that **any increase in journey length may render the journey unfeasible for a pregnant woman.**

¹ See, for example, Bulchandania, S, Coats, A, Gallos, I, Tooze Hobson, P and Parsons, M, (2017) *Normative Bladder Diary Measurements in Pregnant Women*. Obstetrics and Gynaecology

Age - Regarding Age, we would argue that older people are likely to be subject to the same fears identified by TfL as being experienced by younger people, especially late at night. It is not just the journey itself that is the issue, but walking from the bus stop to home (or indeed, from the station to home) regarding which young and old people may feel apprehensive. It is not unknown for people to be 'mugged' on their way home from the station (we know of several examples of this). TfL must surely be aware of this, and it is strange indeed that this fact was omitted from their analysis

We note, too that (at page 20) the report says, again regarding Age, that post construction there may be "*impact upon older people who rely more on private vehicles...*" and goes on to mention "*local services and amenities*" but **not** (bizarrely, given this is Transport for London) access to the transport network.

This appears to be another example of TfL's assumption that because there is no step-free access then this must exclude all elderly, frail, and disabled people from use of Arnos Grove station. Whereas the fact is – as we have repeatedly said – many elderly and disabled people may be unable to undertake a long walk, but do manage to negotiate the few steps into the station after driving there.

Disability – The focus on blue badge holders as being 'typical' of disabled and elderly people is entirely without merit, as local authority officers should surely be fully aware. It has after all been very many years since adoption of the social model of disability by the London Authority² (and hence, by implication, TfL and one would hope, the London Councils); by now all officers should surely have moved on from thinking 'disabled' refers only to those who are blind or a wheelchair user?

In any event, quite aside from this, the EqIA provided by TfL **fails** to identify the extent to which people with disabilities use parking spaces not marked for disabled use, hence in all likelihood has significantly under-estimated blue badge usage of the car parking spaces. Indeed, we have evidence from our own members that this is in fact the case: this is what one of our ETRA members wrote in relation to journeys she makes with one of her friends, a visually impaired Enfield resident who is also a member of ETRA:

"My experience is that the current number of Blue Badge spaces is barely sufficient. I have driven [name of friend removed] (with her Blue Badge) to Arnos Grove many times late afternoon and it's a 50:50 chance if we find a space. If not, we have to go to a normal parking space and pay the full amount, which is still better than waiting for a bus after a night at the theatre! My point is - there are insufficient Blue Badge spaces now."

Irrespective of whomsoever officers believe disability to include (or not), of more importance, surely, is that LBE officers should be aware of their obligation under the PSED to work to **improve** access by disabled and elderly residents to essential services such as public transport, **not to increase the barriers faced by disabled people**, as will be the result of this scheme?

As we have pointed out, the TfL EqIA report also omits several other quite obvious points:

² Miller, L, Broughton, A, Carta, E, Fearn, H (2008) Employment Outcomes for Women in London's Economy. Report to the Greater London Authority. <https://www.employment-studies.co.uk/resource/employment-outcomes-women-londons-economy>. This report is an expanded version of chapter 3 of the GLA's *Women in London's Economy 2008* report.

- Across these groups the TfL assessment **fails to identify** evening use for access to London's cultural economy³, which particularly impacts the elderly and disabled through denial of access and due to concerns for safety.
- There must surely be similar concerns regarding **access for cultural use amongst young people and females** in general (whilst recognising there are some reasons that are specific to women and which additionally impact their ability to access London Underground services should this proposal be approved).
- Regarding older people, as we have already noted, blue badge holders constitute a minority of elderly and mobility-impaired (irrespective of whether through physical or cognitive impairment) travellers. Our officers have conveniently ignored the existence of the 'Brown Badge' parking scheme that LBE has implemented elsewhere around the borough for residents aged over 70, in recognition of their **legitimate need for convenient parking and access**. How can it be legitimate to implement the Brown Badge scheme elsewhere in the borough, in recognition of these residents' needs, yet (apparently) equally legitimate to suggest here that 70 year olds do not in fact have any special need to park conveniently close for access and instead should 'get on their bikes'?

Regarding 'Step-Free Access' we note that in their comments on this point (page 6) the TfL assessors say the following:

"Whilst we are providing an equivalent blue badge parking, it should be noted that the station does not currently have step-free access. A feasibility study has been undertaken by the step-free access team. Our works will ensure they do not impede any future decisions to provide step-free access, however there are no current plans to do so at Arnos Grove Station."

The assessors then go on to indicate that the new housing development will be required to have step free access and that the station is viewed as the primary transport option for estate residents 'as an essential requirement for car-free living'.

It must surely have occurred to both TfL and LBE officers that if step-free access is key to 'car-free' living, then the lack of step free access to the station negates this whole concept? If there is to be no step-free access to Arnos Grove how can there be any rationale to building a step-free housing estate next to it and pointing to access to the station as being the main transport option?

We believe that any competent Planning Officer must surely have considered these matters and recognised that these negative impacts are critical and unacceptable. Indeed, we note that, on Page 10 the TfL impact assessment report states:

Impacts to Protected Characteristics

There are however some people with barriers to travel due to age, impairments or other factors, who **may have their journeys impacted more significantly by the changes**. This may be due to them being **less able to use alternative means of transport, or frequency of travel using local services**.

The simple fact is that TfL has a duty under the Public Sector Equality Duty, arising out of the requirements of the Equalities Act 2010. Accordingly TfL has produced an Equality Impact Assessment to assess the impact of their proposed scheme, and that EqIA (even before its

³ While current circumstances mean there is no cultural economy, we would hope to see this change in the not-too-distant future; there is no excuse for ignoring this as a factor relevant to this matter.

shortcomings are added in) is **damning in its assessment of the critical negative impact of the proposals** on the young, elderly, disabled, female and pregnant, each of which is a named group who should be protected by the Equalities Act 2010 and under Enfield's Public Sector Equality Duty.

This has not been given any recognition in the agenda. Instead, the response of LBE officers has been to suggest that closing the car parks imposes the same level of disadvantage on all users, hence is not an equality issue; and to imply that as some people with disabilities regularly cycle, cycling is a viable means of accessing the station for members of all groups, hence closing the car parks is not an equality issue.

These statements do nothing other than to clearly reveal LBE officers' urgent need for training in their understanding of equalities issues.

To take just one, obvious, point: how is our seriously visually impaired member supposed to cycle to the station?

And regarding elderly people: on Thursday 23rd of December there was torrential rain during the daytime in Enfield, followed by temperatures overnight falling to around 4 - 5°C. Are Enfield officers – and councillors who hold responsibility for planning decisions - seriously suggesting that 70 year olds should cycle in this weather? Or people with chronic health conditions? The same arguments hold with regard to long waits at night for a bus and perhaps a 10 or 15 minute walk at the end of the journey.

Surely LBE officers should be working to **protect** residents' rights, not to **remove** them? Protection is, after all, a legal duty.

To return to TfL's own assessment of negative impacts, we note that on Page 10 the report also states

Impacts to Protected Characteristics

Issues such as the availability of blue badge spaces have been considered to prevent or minimise the impacts on certain groups, along with maintaining pedestrian safety and accessibility to the station throughout construction. Blue badge spaces will be provided by the development (3%) with a commitment to monitor and increase provision by a further 7% (10% overall), should the demand arise.

The report sets out a commitment to build more blue badge spaces '*should the demand arise*' - yet how can this possibly be feasible once the car park has been built on? How would the developers propose to measure demand in future? From where would the funding be provided for this?

It is in fact quite clear that this statement has been made with no real consideration of the situation, with no intent other than to provide reassurance, and with no real intention in reality to do any such thing. Planning officers should surely have recognised this statement for what it is: meaningless waffle.

Furthermore the section on Consultation reveals that there has been very little attempt to engage with people from the various groups 'protected' under the Equality Act. We note that, at page 33, 'Consultation' in response to Question 6 "*How has consultation with those who share a protected characteristic informed your work?*" the authors can only report the contributions to the consultation broken down by age and religion. It reveals there has been no proper engagement with people from any of the protected groups who use the station. While there is reference to three 'pop up' events there is no indication of the times of day at which they took place (surely a key factor in

ensuring engagement across the range of users); and a reference to a fourth event '*which did not take place*' (hardly a vote of confidence).

It appears very much as if an honest answer would have been that the team had failed to undertake any consultation specifically with those who share a protected characteristic. The 'Consultation' section nonetheless reveals that amongst those who were consulted: "*There was, as expected, a concern for the loss of the car park*" with almost two-thirds (65.17%) of respondents stating that they were "Unhappy" (1 on a 1 – 10 scale) with the removal of the car-parking at Arnos Grove. This only serves to indicate TfL's lack of concern for passengers – surely the group for whom they should have **most** concern – and, given that they are current LBE residents, those whose interests LBE officers should be at pains to protect?

The instruction stated at page 37 says: "You must address any negative impacts identified in step 3 and 4".

It is not at all clear that either TfL or Enfield officers have done this in any meaningful way at all.

In conclusion, the Equality Impact Assessment referred to by LBE officers and apparently relied upon for the judgements provided in their report, is revealed upon inspection to contain significant gaps in its analysis. Even accepting the limitations we noted, however, it nonetheless reveals that TfL analysts **recognised the significant additional barriers** these proposals put in the way of access to the station by many of the groups that should be protected by the Equality Act 2010 – and whose rights therefore should be protected by officers were they properly aware of, and compliant with, their duties under the Public Sector Equality Duty.

The Equality Act has a significant and particular obligation on your committee. It is imperative that your officers take all possible actions to ensure that you are fully apprised of the implications of any proposal. Here, where the appraisal undertaken by TfL – albeit limited and with several demonstrable gaps – revealed significant impacts for passengers, **officers do not appear to have properly drawn these to your attention**. Worse, your officers do not appear to have undertaken any realistic appraisal of the situation, let alone undertaken their own Equality Impact Assessment, as is in fact demanded by the public sector equality duty. To say, effectively, that '*everyone will be negatively affected, so there is no equalities issue*' simply serves to demonstrate the need for urgent training in improving these officers' understanding inequalities issues.

Taken together, these facts appear to constitute a shocking dereliction of duty. It also has the effect of making it appear as if the officers involved were more concerned with facilitating the developers' wishes than with protecting the rights of existing, vulnerable, residents and passengers – those residents who these officers' roles place a legal duty upon them to protect.

The question surely has to be asked: "*How could LBE officers have read this report and concluded that it holds no implications for their duties under the Public Sector Equality Duty and the Equality Act 2010?*"

Yours sincerely

Dr Linda Miller

Chair, on behalf of the committee of Enfield Town Residents Association

Email: Enfieldtownresidentsassoc@gmail.com

PLANNING COMMITTEE

05 January 2021

REPORT OF:

Head of Planning - Vincent Lacovara

Subject:

Planning Committee 5th January 2021

Update for Members

Contact officer:

Andy Higham - Head of Development Management

E mail: [REDACTED] [enfield.gov.uk](mailto:[REDACTED]@enfield.gov.uk)

Tel: [REDACTED]

Update to Planning Committee

Ahead of Tuesday's Planning Committee meeting, please note the following updates to the Committee report which will be of assistance to Members in your assessment of the proposals.

Agenda Item: 5

20/01049/FUL and 20/01188/LBC – Car Park Adjacent to Arnos Grove Station, Bowes Road, London, N11 1AN

1. Updates

1.1. Officer responses are provided below in respect of points raised in the following representations, received following / during completion of the final report pack:

1.1.1. 2 x further representations from **Cockfosters Local Area Residents Association objecting:** 24 December 2020 and 18 December (*summary of previous objections set out at 6.37 of the Main Report*);

1.1.2. 1 x further representation from **Enfield Town Residents Association objecting:** 24 December 2020 (*summary of previous objections set out at 6.41 of the Main Report*).

Cockfosters Local Area Residents Association (18.12.2020)	
Summary of Objection	Officer Response
Equality Act 2010 and the Public Sector Equality Duty Due Regard Under the Act	
2. Both TfL and the Council are subject to the Public Sector Equality Duty (PSED) imposed by s.149. This requires public sector authorities to have 'due regard' to the need to 'advance equality of opportunity' between persons who share a relevant protected characteristic and persons who do not share it.	Section 8.20 of the 05.01.21 Planning Committee Report (Agenda Item 5) sets out how in line with the Public Sector Equality Duty the council must have due regard to the need to eliminate discrimination and advance equality of opportunity, as set out in section 149 of the Equality Act 2010.

<p>3.</p>	<p>'Due regard' is a positive duty. This means that 'due regard' must be at the heart of the decision-making process and information must be actively sought before coming to a decision, for example by consulting with effected parties.</p>	<p>Section 8.20 of the 05.01.21 Planning Committee Report (Agenda Item 5), and other sections throughout the report (including Paragraphs 1.14, 1.15, 6.5, 8.6.1 – 8.6.3, 8.7.13, 8.10.35, 8.10.36 and 8.10.55) explain how the Officers have taken the Equality Act (2010) into account in the processing of applications 20/01049/FUL and 20/01188/LBC and preparation of the Planning Committee Report.</p> <p>Officers are satisfied the assessment and submitted material has considered these issues.</p> <p>Matters considered include proposed: taxi drop-off; general drop-off; blue badge parking (public re-provision and residential provision); public cycle parking (re-provision and enhancement); loss of public non-blue badge parking car spaces; public realm design; impacts on traffic; bus interchange; affordable housing; accessible and family housing; and inclusivity.</p> <p>Officers have considered the Applicant's survey details – which indicate most existing car park users live within walking distance from a station or 640m away from a bus stop serving Arnos Grove station ('walking distance') – providing alternative options for access to Transport for London's Underground services, central London and other destinations.</p>
<p>4.</p>	<p>It appears that no such consultation has been undertaken by either Officers or the Applicant.</p>	<p>Relevant information, material and evidence informing Officers assessment (including the matters summarised at Point 3 above and Point 7 a) – j) below) was originally submitted to the Council in April 2020. This includes the Applicant's Transport Assessment, Planning Statement and Design and Access Statement. This material has been publicly available to be viewed during two rounds of formal consultation (May and October). A further press notice was published (16 December 2020).</p>

		<p>The Local Planning Authority's approach to consultation is set out at Section 6 and has included two rounds of consultation – including letters sent to 1,320 properties, press and site notices. The Applicant's pre-submission engagement activities are set out at Paragraph 4.17 of the report. These included a programme of pre-submission consultation which ran from June 2019 to March 2020, including meetings with community groups; a 'Meet the Team' event; one public consultation event over 2-days; and electronic and non-electronic (leaflets and posters) communication.</p>
5.	<p>It is not lawful to make a decision and subsequently seek to justify it. Nor can the Duty be delegated to an Applicant.</p> <p>Officers have stated that the Applicant completed an Equality Impact Assessment (EIA) without producing evidence of it or any evidence of due diligence that they may have conducted in relation to it.</p>	<p>At the time of writing a decision has not been made in respect of applications 20/01049/FUL and 20/01188/LBC by the Local Planning Authority. The Planning Committee Report (05.01.2021) sets out the Officers assessment and recommendation, which will be considered by Planning Committee Members on 05.01.2021.</p> <p>Paragraph 8.20.20 of the Planning Committee Report explains the duty under Section 149 of the Equality Act 2010 is not a duty to prepare an Equality Impact Assessment, but to have due regard to the issues. Notwithstanding this, the Applicant submitted an Equality Impact Assessment and confirmed it could be made public following a request by Officers.</p>
6.	<p>If this application is approved without the Officers conducting their own EIA and the committee interrogating it, Enfield would be in breach of the 2010 Act and subject to referral to the Equalities and Human Rights Commission.</p>	<p>Paragraph 8.20.20 of the Planning Committee Report explains the duty under Section 149 of the Equality Act 2010 is not a duty to prepare an Equality Impact Assessment. Section 149 of the Equality Act requires that public authorities have due regard to equality considerations when exercising their functions. The Act does not specifically require an Equality Impact Assessment nor define how it should be carried out.</p> <p>Paragraph 8.20.1 of the Planning Committee Report explains that due to the nature of objections received (including those submitted and</p>

		<p>received between 19.11.2020 – 24.11.2020) it has been decided to include an expanded section on equalities to clarify the substance of the Local Planning Authority’s reasoning – demonstrating how the local planning authority has addressed its duty under the Equality Act 2010 in consideration of the submitted applications.</p> <p>Paragraph 8.20.30 explains that the provisions of the Human Rights Act 1998 have been taken into account in the processing of the application and the preparation of the report.</p>
Advance Equality not Mitigate Harm		
7.	The Act requires a public sector body to ‘advance equality’. Mitigating harm is insufficient, positive action to improve the situation is required.	<p>Officers have not solely considered mitigation. As summarised at Section 1.0 and Section 8.20, Officers have taken account of a range of factors in respect of the submitted applications and in preparing the 05.01.21 Planning Committee Report including:</p> <ul style="list-style-type: none"> a) Applicant survey details – indicating that most existing car park users live within walking distance from a station or 640m away from a bus stop serving Arnos Grove station (‘walking distance’) – providing alternative options for access to Transport for London’s Underground services, central London and other destinations; b) Applicant submitted data on the utilisation of the car parks; Section 70(2) of the Town and Country Planning Act 1990; c) Officers have assessed the applications in the context of the adopted development plan and other material considerations (Section 70 of the TCPA and Section 38 of the Planning and Compulsory Purchase Act); d) adopted development plan policies, including NC Policy 17; e) material considerations including NPPF and LP(ItP) support for redevelopment of car parks and the NCAAP Equality Impact Assessment – Equality Analysis (2013); f) Additional material considerations including the

		<p>strategic, and local benefits, of implementing the Mayor of London's London Plan Intend to Publish (LPItP) transport policies – which seek to achieve a more accessible environment for those who might not otherwise be able to travel;</p> <ul style="list-style-type: none"> g) the fact the majority of Transport for London stations do not have car parks and the accessibility of all of Transport for London's buses; h) disbenefits of the existing car park; i) benefits of the proposed development (including improved blue badge space design, layout, lighting and surfacing, improved public realm (design, layout, lighting and gradients) and increased and improved public cycle parking – including 5% of cycle parking spaces dedicated for non-standard cycles); and j) mitigation measures where Officers consider there is potential for differential effects. <p>Officers are satisfied that consideration of the proposed development has had due regard to the need to achieve the statutory goals of the Equality Act. As set out at Paragraph 8.20.31, Members should also take account of the provisions of the Human Rights Act 1998 as they relate to the application and must also be mindful of the Local Planning Authorities' legal duty under the Equality Act 2010.</p>
8.	It is clear that the position of people with a relevant protected characteristic will be worsened, not improved, if the car park is closed.	<p>The Officer assessment does not concur with the statement that 'the position of people with a relevant protected characteristic will be worsened, not improved, if the car park is closed'.</p> <p>The proposed closure of the public car park is part of a broader proposal which seeks to replace the car park with a high-quality residential led proposal. Section 8.20 outlines adverse, neutral and positive impacts in respect of the overall proposals. Officers have assessed the applications in the context of the</p>

		<p>adopted development plan and other material considerations (Section 70 of the TCPA and Section 38 of the Planning and Compulsory Purchase Act).</p> <p>Adopted Development Plan policies include Enfield policies (Section 7 of the 05.01.21 PCR) which promote sustainable transport options, improvements to the quality and safety of the public realm and reductions in congestion. Adopted and emerging Development Plan policies include London Plan policies which also aim to minimise car parking, reduce car-reliance and encourage non-car travel.</p>
The Application and the Act		
9.	<p>Under the proposed scheme, instead of having 297 general and six Blue Badge parking spaces, there will only be six Blue Badge spaces. As Blue Badge spaces are only available to people with chronic mobility problems, these proposals fail to provide equal treatment for all the people with protected characteristics who use the car park.</p>	<p>The Officers assessment has taken into account a range of considerations – including those summarised at point No. 7 above. The Planning Committee Report does not assert that the re-provision of 6 no. Blue Badge spaces is the sole consideration.</p>
10.	<p>The applicant argues that they have retained the Blue Badge spaces to address this. However, preserving the status quo is not advancing 'equality of opportunity'.</p> <p>Six Blue Badge spaces will fail to address the needs of the aged,</p>	<p>Officers have assessed that blue badge space design, layout, lighting and surfacing would be improved. Paragraph 8.10.35 of the Planning Committee Report explains that Officers have given due regard to the benefits of the scheme including improved blue badge space design, layout, lighting and surfacing. Officers have assessed these proposals compared with the existing situation. Officers have considered the benefits of improved public realm (design, layout, lighting and gradients).</p> <p>Paragraphs 8.10.16 – 8.10.18 assesses existing blue badge parking space utilisation and concludes there is enough evidence to demonstrate that re-provision of 6 no. blue badge parking spaces is sufficient to respond to need at this station.</p> <p>Officers have not suggested blue badge re-provision addresses the</p>

	<p>pregnant women, and those with children who will not be able to be dropped off in future by family and friends as no 'drop-off' has been incorporated in the design of the development.</p>	<p>need of all protected characteristic groups. Section 8.20 of the Planning Committee Report sets out the assessment approach.</p> <p>Paragraph 8.10.39 explains the Applicant will work with the council to provide a drop-off location following proposed closure of the existing car park, and during the construction phase. This would be monitored during the construction period – and would be subject to a future decision on arrangements.</p>
11.	<p>Indeed, the retention of six Blue Badge spaces does not even fully address the needs of Blue Badge holders. Disabled people need a high degree of certainty when they embark on a journey, as their ability to be flexible when faced with an unexpected travel problem is less than that of others. Currently, if they travel to the station by car and all the Blue Badge spaces are full, they have the option of parking in a regular parking space. They will have no such option in the proposed scheme.</p>	<p>See Point No. 10 above. Paragraphs 8.10.16 – 8.10.17 of the Planning Committee Report explain that blue badge surveys demonstrate that the peak utilisation of the blue badge car parking bays is 4 no. of the 6 no. bays being used. In addition, the use of blue badge parking bays was photographed at various times during the project. These show < 100% utilisation of the spaces – with one or two spaces not occupied when the photos were taken.</p>
12.	<p>TfL has embarked on a programme of repurposing its 'Park & Ride' facilities. They have announced 15 initial sites. The Committee should note that TfL's three applications in the LB Harrow, all in partnership with Catalyst Housing (a housing association, not a private sector property developer), retain substantial car parking: at Canons Park 60 spaces + four Blue Badge spaces; at Stanmore 300 spaces in new underground parking + 12 Blue Badge spaces; and at Rayners Lane 75 spaces + six Blue Badge spaces. Note also that units in the 'Catalyst' developments will be 100% affordable. The Committee is asked to consider why the TfL's approach in Harrow is so different.</p>	<p>The Arnos Grove proposals are part of the Applicant's (Connected Living London) London-wide Build to Rent portfolio. The Arnos Grove proposals appear to be one of the smaller schemes. Other schemes appear cumulatively larger and taller. One scheme ranges up to 16-storeys in height, another up to 10-storeys. Some non-Build to Rent portfolio schemes appear to have heights up to 21- storeys. The LB Harrow schemes propose differing housing products, have a different context, site-constraints and planning context. Those schemes include buildings up to 11 storeys and are not part of the Build to Rent portfolio.</p> <p>As noted at Paragraph 8.3.29 of the Planning Committee Report the development economics associated with Build to Rent are unique. The Planning Committee Report has assessed this proposal, including affordable housing in line with NPPF, London Plan (adopted and emerging)</p>

		<p>and Enfield Council policies which explain that affordable housing negotiations take into account the specific nature of the site, scheme and available funding resources (paragraph 8.3.31) and relative importance of other planning priorities and obligations. Officers have set out the grant funding assumed.</p> <p>Paragraph 8.3.32 explains the relative importance of planning priorities at this site (in accordance with Enfield Core Strategy Policy 3) – explaining that scheme layout, scale and density have been informed by site-specific constraints and challenges of this site – with viability implications. Arnos Grove Station is a Grade II* listed building of unique importance in Enfield. It is one of the most highly regarded examples of Charles Holden's designs. Scheme design has been heritage-led, informing building layout, envelope and height and scale.</p>
13.	<p>The Officers' report is disingenuous and misleading. It states that alternative disabled parking spaces are available at Cockfosters and Oakwood. Officers are well aware that there is a pending application to develop Cockfosters Station car park, one of the 15 developments planned by TfL. As is public knowledge, TfL is evaluating the future of all its 79 car parks, including the one at Oakwood Station.</p>	<p>As noted at No. 11 above, some protected characteristic groups value certainty when using public transport. For some people, journeys require forethought and planning based on an understanding of step-free access and/or public facilities. The Officers' report (Update) noted Arnos Grove did not provide such facilities. Arnos Grove does not provide male / female/ baby changing / accessible toilets (no fee charged for toilet facilities). Arnos Grove does not provide step-free access from street to platform.</p>
14.	<p>Further, it is discriminatory to force people with protected characteristics to travel farther to a station in a more expensive Travel Zone and with a longer travel time into town.</p>	<p>Section 6.0 includes objections received on the basis that people would not be able to access the underground system if non-blue badge parking spaces are removed. The consideration of alternative routes, modes and stations, as part of Officers' assessment of 'alternative options' as set out at Section 8.10 of the Planning Committee report is a relevant consideration.</p>
Case Law		
15.	<p>There is case law supporting our objection. In LDRA Ltd & ors v. SSCLG (2016), a judicial review of a</p>	<p>Officers have reviewed the cited case, alongside other case law considering the PSED in respect of Council</p>

	<p>planning appeal on the development of a car park, it was held that the Planning Inspector did not have due regard to the effect of the closure of the car park on the ability of disabled people to access a local amenity. Key findings in this case were:</p> <ul style="list-style-type: none"> - The inspector failed to record the steps he had taken to meet his statutory duty. - The Minister must assess the risk and adverse impact. - Public authorities must be properly informed before taking a decision. - 'The 2010 Act imposes a heavy duty on public authorities ...' 	<p>decision making, including where a Council has acted as Local Planning Authority. Officers are satisfied that Section 8.20 of the 05.01.21 Planning Committee Report (Agenda Item 5), and other sections throughout the report (including Paragraphs 1.14, 1.15, 6.5, 8.6.1 – 8.6.3, 8.7.13, 8.10.35, 8.10.36 and 8.10.55) explain how Officers have taken the Equality Act (2010) into account in the processing of the application and preparation of the Planning Committee Report.</p> <p>Relevant information, material and evidence used to inform the assessment (including material set out at Point No. 7 (a) – (j) above), have been known to Officers since early 2020, including supporting applicant material submitted in April 2020. Officers have considered consultation responses received, including those received between 19.11.2020 – 24.11.2020).</p>
Unaffordable homes		
16.	<p>Enfield Council places great importance on the provision of homes that meet the needs of the borough's less well-off residents, both in terms of quality and affordability. This scheme wholly fails to meet those needs.</p>	<p>Affordable Housing, including affordability and borough housing needs are assessed at Section 8.3, including Paragraphs 8.3.38 – 8.3.47. Housing quality is assessed at Section 8.6 of the 05.01.21 Planning Committee Report (Agenda Item 5).</p> <p>Officers have assessed the scheme would meet existing housing needs, including addressing housing needs of local households who are unable to afford to purchase a home privately – relying on private rent housing. Paragraph 8.3.36 explains that intermediate housing addresses this need – Build to Rent is more affordable and flexible than other private rented stock, providing quality and security. Officers have considered ONS and Council data at Paragraphs 8.3.34 – 8.3.37 including housing composition in the local area (Southgate Green Ward).</p>
17.	<p>The scheme provides a very large proportion of one- and two-bedroomed units instead of addressing the Borough's need for</p>	<p>Housing mix, including Affordable Housing mix, is assessed at Section 8.5 of the 05.01.21 Planning Committee Report (Agenda Item 5).</p>

	<p>family homes. Table 1 sets out the extent of this failure.</p>	<p>Paragraph 8.5.5 notes that relevant adopted guidance in respect of Build to Rent housing (Affordable Housing and Viability SPG) highlights that local policies requiring a range of unit sizes should be applied flexibly to Build to Rent schemes to reflect demand for new rental stock, which is much greater for one and two beds than in owner-occupied or social/ affordable rented sector.</p> <p>In respect of Intermediate Housing, mix flexibility is allowed for under Enfield's adopted development plan policies. Paragraph 8.5.5 considers Enfield Core Strategy Policy 5, which allows for a range of housing types in the intermediate sector, including affordable homes for families. Enfield Core Strategy Policy 5 notes that the mix of intermediate housing sizes will be determined on a site by site basis and the Council will work with developers to agree an appropriate mix considering a range of factors including development viability and the affordability of potential users.</p> <p>Officers have concluded at Paragraph 8.5.7 that the proposed housing mix is appropriate, having regard to the Build to Rent typology (and applicable Build to Rent planning guidance), specific site characteristics, location and adopted Enfield Core Strategy Policy 5 (and DMD 3). As set out at Paragraph 8.5.5 Officers have also considered the existing high proportion of existing 3+bed family houses in Southgate Green ward. Officers have also considered Strategic Housing Market Assessment (SHMA) predictions that between 2011-2035 around 70% of newly forming households will be 1 and 2-person households without children.</p>
<p>18a</p>	<p>The Applicant claims that it will provide 40% affordable homes: this should be 50% as the scheme is on public land.</p>	<p>The 50% target is addressed at Paragraph 8.3.31 of the 05.01.21 Planning Committee Report (Agenda Item 5). Paragraph 8.3.31 sets out that the 'portfolio' approach proposed by the Applicant is accepted by Local Planning Authorities across London with the 50% strategic target achieved</p>

		at a pan-London level in accordance with London Plan (ItP) Policy H5. The portfolio approach means that each site contributes towards a London-wide 50 per cent requirement. This means, some sites would deliver below and others above 50%.
18b	As we argue below, the homes to be provided have projected rent levels that are far higher than Enfield households on median net income or below can afford.	<p>Paragraphs 8.3.50 concludes that in accepting the scheme as a Build to Rent scheme (see detailed assessment at Paragraph 8.3.17) London Plan (ItP) Policy H11 states that affordable housing can be solely Discounted Market Rent (DMR) at a genuinely affordable rent, preferably at London Living Rent level. Enfield's adopted policies, including Development Management Document Policy DMD 1 (Affordable Housing) are silent on Build to Rent schemes. DMD 1 is also silent on preferred Discounted Market Rent levels and London Living Rent as preferred affordable housing products for Build to Rent schemes.</p> <p>Officers have assessed that the proposed rents discussed with the Applicant (set out at Appendix 11) are in accordance with supporting text to Policy H6 of the LP(ItP). This states that for dwellings to be considered affordable, annual housing costs, including rent and service charge, should be no greater than 40 per cent of net household income, based on relevant household income limits (£60,000), and these should be available to people on a range of incomes below the maximum household income.</p>
19	We set out the rent levels quoted by the Applicant in its own Viability Assessment, compared to the various affordable rent levels in Table 2. The differences are stark.	
20	The truth is that the Scheme provides: No homes at Social or London Affordable Rents. 11.7% homes at London Living Rents, intended for Londoners on middle-incomes. 27.8% homes at discounted rents – higher than the maximum level for intermediate rent levels. As these homes will be let at rents above the maximum for affordable rents, they are clearly not affordable.	See 18a – 19 above. The Applicant is not proposing social rent or London Affordable Rent homes. London Affordable Rent and Social Rent homes are for households on low incomes where the rent levels are based on the formulas in the Social Housing Regulator's Rent Standard Guidance. The 05.01.21 Planning Committee Report (Agenda Item 5) explains the Affordable Housing proposed is intermediate. As explained at 8.3.42 the proposed Discounted Market Rent (non-LLR)

		affordable housing can be more affordable than Shared Ownership. Shared ownership has a higher household income cap of £90,000.
21	The flats in this proposed development would all be unaffordable for the majority of Enfield residents, let alone lower income households.	See 18a – 20 above. £60,000 is a household income cap. The Applicant has stated they will make DMR homes available through the Mayors Homes for London portal to households, including those with incomes below £60,000 with priority given to those with the lowest eligible income who live or work in Enfield.
	Quality	
22a	Enfield's need is overriding for family homes. Of the 162 units proposed, only 14 (8.6%) are 3-bedroom units and none are larger.	Please see no. 17 above. Officers conclude at Paragraph 8.5.7 of the 05.01.21 Planning Committee Report (Agenda Item 5) that the proposed housing mix is appropriate, having regard to the Build to Rent typology (and applicable Build to Rent planning guidance), specific site characteristics, location and adopted Enfield Core Strategy Policy 5 (and DMD 3). As set out at Paragraph 8.5.5 Officers have also considered the existing high proportion of existing 3+bed family houses in Southgate Green ward and (GLA) Strategic Housing Market Assessment (SHMA) predictions that between 2011-2035 around 70% of newly forming households will be 1 and 2-person households without children. Housing need (as indicated through the Council's housing waiting list, indicates housing need is mainly in respect of 1 and 2-bed homes).
22b	Furthermore, the Development provides unacceptably small amenity space.	Paragraphs 4.9, 4.13, 8.5.6, 8.6.5 – 8.6.40 of the 05.01.21 Planning Committee Report (Agenda Item 5) set out proposed private amenity space, communal amenity space and play space requirements and provision. All proposed new homes have access to private (external) amenity space and meet minimum (internal) space standards. Almost all proposed homes also exceed minimum (internal) space standards by at least 0.5sqm. As set out at Paragraphs 4.9 and 8.6.35 communal amenity space

		of 3,230sqm is proposed across the scheme.
	Tenure Blind	
23.	It is shocking to see that all the so-called affordable units are segregated into a single building, A02. The segregation is total; there are no affordable units in the other buildings and there are no market units in A02. Note also that building A02 is the tallest in the proposed scheme and includes all the 'family' units.	<p>The statement that 'there are no market units in A02' is not correct. The statement the proposed development results in 'segregation' is refuted. 2 no. market units are proposed in Block A02 – as shown on drawing no. MLUK-721-A-P-XX-1106 (Rev 1).</p> <p>Officers are satisfied that the scheme is tenure blind (see also Officer Response no. 24 below). Paragraph 8.6.38 of the 05.01.21 Planning Committee Report (Agenda Item 5) conclude that the scheme is tenure blind – with no clear distinction in terms of quality between private and affordable homes. The proposal is assessed, as a whole, to be well integrated, cohesive and complementary in accordance with Enfield policy DMD 1.</p>
24	There has been no attempt to make the scheme 'tenure blind'.	Officers are satisfied that the scheme is tenure blind (see no. 23 above).
25	One of the benefits envisaged by the Mayor of Build-to-Rent schemes (Homes for Londoners SPG: para 4.21) is that 'units can be more easily be tenure blind and be 'pepper potted' through the development.' This Application contravenes both Enfield's and the Mayor's guidance.	<p>Officers have carefully considered to the quality of the proposed affordable housing units, including internal amenity conditions – and access to private, communal and play space to satisfy themselves in respect of the quality of the affordable housing proposed.</p> <p>Critically, equal access is proposed between proposed homes and all communal amenity areas. For example, children living in any home would be able to access play space throughout the scheme (with a recommendation that this be secured by Section 106). Future residents of Block A02 would have access to facilities throughout the scheme, including communal amenity areas, concierge and residents' facilities. The location of affordable homes in Block A02 has also been informed by design considerations, seeking to locate family homes closest to the largest area of open and (doorstep) play space proposed on site.</p>

26	Table 2 (Comparative Weekly Rent Levels) shows the Applicant's proposed rent levels compared to comparable Enfield affordable rent levels. The differences, shown in percentage terms in the final part of the table, are stark. For example, the proposed discounted market rents are 209–240% of the Social Rent levels and the proposed London Living Rent levels 187–194% of the Social Rent Levels	See 18a – 20 above. The Applicant is not proposing social rent or London Affordable Rent homes. London Affordable Rent and Social Rent homes are for households on low incomes where the rent levels are based on the formulas in the Social Housing Regulator's Rent Standard Guidance. The 05.01.21 Planning Committee Report (Agenda Item 5) explains the Affordable Housing proposed is intermediate. Affordability is assessed in respect of adopted and emerging policies and guidance, relative to household income and as a % of market (open market) rent. An assessment of rent levels against Social Rent or London Affordable Rent is not supported by adopted or emerging Policy. As explained at 8.3.42 the proposed Discounted Market Rent (non-LLR) affordable housing can be more affordable than Shared Ownership. Shared ownership has a higher household income cap of £90,000.
Enfield Town Residents Association (24.12.2020)		
Summary of Objection		Officer Response
27	It was implied in the Update Report (in the lead up to 24 November 2020) that the Applicant's Equality Impact Assessment had informed officers' decision to recommend approval of the proposal.	<p>The Officers assessment does not concur with this statement. Officers provided an update in respect of the Applicant's Equality Impact Assessment (EqIA) in response to objections submitted and received between 19.11.2020 – 24.11.2020.</p> <p>Relevant information, material and evidence informing Officers assessment (including the matters summarised at Point 3 and Point 7 a) – j) above) was originally submitted to the Council in April 2020. This includes the Applicant's Transport Assessment, Planning Statement and Design and Access Statement. Assessment and consideration of this material, includes the assessment set out at Section 8.20 of the 05.01.21 Planning Committee Report (Agenda Item 5), and other sections throughout the report (including Paragraphs 1.14, 1.15, 6.5, 8.6.1 – 8.6.3, 8.7.13, 8.10.35, 8.10.36 and 8.10.55) which explain how Officers have taken the</p>

		Equality Act (2010) into account in the processing of applications 20/01049/FUL and 20/01188/LBC and preparation of the Planning Committee Report.
28	<p>Subsequent requests elicited a copy of the TfL Equalities Impact Assessment report. On inspection, it is clear that the report should have sounded alarm bells for any local authority officer who read it.</p> <p>The report in fact clearly recognises the fact that the proposed development will create very real problems for groups of residents who, by rights, should be protected by the Equalities Act 2010 (and to which TfL, as well as LBE, are subject) and which therefore carries implications for LBE under its Public Sector Equality Duty. The TfL assessment identifies many negative impacts of their proposal identified by TfL both during and (far more seriously) after construction is completed. We focus in this letter on the post construction impact issues set out by TfL as these are surely a key planning approval consideration.</p>	<p>Please see point No. 8 above. The Officer assessment does not concur with the statement that 'it is clear that the report should have sounded alarm bells for any local authority officer who read it'.</p> <p>Section 8.20 explains the proposed closure of the public car park is part of a broader proposal which seeks to replace the car park with a high-quality residential led proposal. Section 8.20 outlines potential adverse, neutral and positive effects in respect of the overall proposals. This is a robust consideration of issues. It is also aligned with the approach adopted by the Council when it originally considered redevelopment of the car parks as part of the NCAAP Equality Impact Assessment – Equality Analysis (2013).</p> <p>The Applicant has explained that their Equality Impact Assessments are considered to be 'live documents' which evolve and are added to as projects progress. They therefore anticipate that the document will evolve.</p>
29.	<p>Age - the report acknowledges that Southgate has an older population than the Borough average. It states: "As the scheme closes the car parks, this may have an impact upon older people who rely on private vehicles to access local services and amenities." Within the section on age the report also concludes that "Where residents can no longer arrive by car, there may be an impact on the safety, or perception of safety for younger travellers, who are more likely to feel worried about safety while travelling on public transport."</p> <p>(page 3) Age – We would argue that older people are likely to be subject to the same fears identified by TfL as</p>	<p>See Point no. 3. above. Section 8.20 of the 05.01.21 Planning Committee Report (Agenda Item 5), and other sections throughout the report (including Paragraphs 1.14, 1.15, 6.5, 8.6.1 – 8.6.3, 8.7.13, 8.10.35, 8.10.36 and 8.10.55) explain how the Officers have taken the Equality Act (2010) into account in the processing of applications 20/01049/FUL and 20/01188/LBC and preparation of the Planning Committee Report. Officers consider there are some people with barriers to travel due to age, impairments or other factors, who may have their journeys impacted more significantly. Officers have carefully assessed these potential effects, and also considered potential</p>

	<p>being experienced by younger people, especially late at night. It is not just the journey itself that is the issue, but walking from the bus stop to home (or indeed, from the station to home) regarding which young and old people may feel apprehensive.</p> <p>Disability – “there may be a particular impact for older people who do not qualify for blue badges, but still find walking longer distances or navigating public transport more difficult.” The Impact Assessment also notes that “As the scheme closes the car parks, this may have an impact upon older people who rely more on private vehicles to access local services and amenities.”</p>	<p>alternative options available to existing car park users (based on Officer analysis of objections received / postcodes provided and survey information submitted in support of the application. Officers have also proposed mitigation in respect of potential effects. Generally, Officers are satisfied in respect of the credibility of ‘alternatives’ for existing users – which would not preclude access to the tube network or central London.</p> <p>In respect of perceived safety, the design and layout of the existing public car park currently presents obstacles which may not meet the needs of all potential users – creating opportunities for anti-social behaviour, criminal activities, which undermine creating a sense of safety. Officers have assessed that the public realm design (including proposed new square) would have a positive effect in respect of perceived safety.</p>
<p>30.</p>	<p>Gender – the report reiterates the above point regarding fears of anti-social behaviour in the context of protected characteristic ‘Gender’. The authors report that “Where residents or visitors can no longer arrive by car, there may be an impact, or a perceived impact on safety. This would have a more significant impact on women who are more likely to change their travel plans due to concerns over safety.” The authors note that this affects the “Entire Scheme”. Regarding Parking and Access, the assessment reports that “As women are more likely to be travelling with buggies and children, using public transport can be more difficult. There may therefore be more of an impact on women due to the removal of parking at the station” This is, of course, entirely in line with the concerns we raised in our earlier submission.</p>	<p>Section 8.20 of the 05.01.21 Planning Committee Report (Agenda Item 5) considers there may be an impact in respect of those travelling with children, or while pregnant. Officers have carefully assessed these potential effects, and also considered potential alternative options available to existing car park users (based on Officer analysis of objections received and survey information submitted in support of the application. Officers have also proposed mitigation in respect of potential effects. Generally, Officers are satisfied in respect of the credibility of ‘alternatives’ for existing users – which would not preclude access to the tube network or central London.</p> <p>In respect of perceived safety, the design and layout of the existing public car park Officers have assessed that the public realm design (including proposed new square) could have a positive effect in respect of perceived safety.</p>
<p>32.</p>	<p>Gender re-assignment – similarly to the concerns raised in the context of Gender, the report points out that</p>	<p>Officers have assessed that the public realm design (including proposed new</p>

	<p>removal of the car park may lead to concerns about safety and/or feelings of safety for people in the 'gender re-assignment' group. It states that "Fears of intimidation and/or abuse are sometimes mentioned by LGBT Londoners as barriers for increased public transport use. LGBT Londoners may therefore experience lower perception of personal safety as a result. This may be negatively impacted by the removal of car parking, requiring people to travel by other means." A similar point is made under the protected characteristic category of 'sexual orientation'. None of the points subsequently raised under 'Positive impacts' indicate the likelihood that any of the alleged benefits of the scheme will address or indeed negate these concerns. Just one, 'Improvements to the public realm space', suggests that improvements "such as better lighting, passive surveillance and increased footfall [might] contribute to a reduction in anti-social behaviour, safety and the feeling of safety". However, these changes are restricted to the vicinity of the station. While it might improve feelings of safety for people in these groups, it fails to address the far wider issue of safety while waiting at the bus stop, on the bus, or walking home along dark streets at night for members of the various protected groups.</p>	<p>square) could have a positive effect in respect of perceived safety.</p> <p>Paragraph 8.20.27 of the 05.01.21 Planning Committee Report (Agenda Item 5) notes that objections have been received stating that improvements to 'safety and the feeling of safety in an area' are not relevant in considering the equality impacts and effects of the proposals. The Officers assessment does not concur with this statement. Paragraph 8.20.27 goes on to state that feeling unsafe and being unsafe in an area can be a barrier to travel for protected groups. Officers consider these effects and impacts are relevant in the assessment of the scheme – and have given due regard and consideration to the potential effects of the proposed development on all those with protected characteristics as defined under the Equality Act 2010.</p> <p>In respect of potential effects in respect of perceived safety please see Point no. 29 above.</p>
	<p>Omissions in report</p>	
<p>33.</p>	<p>Pregnancy and maternity – Anyone who is pregnant or who has a baby/babies or young children is particularly likely to want to travel by private transport for reasons of convenience – as the report points out, it is not easy to travel with a buggy or wheelchair on a bus. This, therefore, points to the additional impact on women who have babies.</p>	<p>Officers have considered the potential effects on pregnant women and women with children in respect of the potential loss of non-blue badge parking spaces at Section 8.20.</p>
<p>34.</p>	<p>Disability – The EqIA provided by TfL fails to identify the extent to which people with disabilities use parking spaces not marked for disabled use, hence in all likelihood has significantly</p>	<p>The Officers assessment takes into account a range of considerations – including those summarised at point No. 7 above. Officers have not suggested blue badge re-provision addresses the need of all protected</p>

	<p>under-estimated blue badge usage of the car parking spaces.</p> <p>We have evidence from our own members that this is in fact the case: this is what one of our ETRA members wrote in relation to journeys she makes with one of her friends, a visually impaired Enfield resident who is also a member of ETRA: “My experience is that the current number of Blue Badge spaces is barely sufficient. I have driven [name of friend removed] (with her Blue Badge) to Arnos Grove many times late afternoon and it's a 50:50 chance if we find a space. If not, we have to go to a normal parking space and pay the full amount, which is still better than waiting for a bus after a night at the theatre! My point is - there are insufficient Blue Badge spaces now.”</p> <p>Irrespective of whomsoever officers believe disability to include (or not), of more importance, surely, is that LBE officers should be aware of their obligation under the PSED to work to improve access by disabled and elderly residents to essential services such as public transport, not to increase the barriers faced by disabled people, as will be the result of this scheme?</p>	<p>characteristic groups. Section 8.20 of the Planning Committee Report sets out the assessment approach.</p> <p>Please see point No. 10 above. Paragraphs 8.10.16 – 8.10.18 assesses existing blue badge parking space utilisation and concludes there is enough evidence to demonstrate that re-provision of 6 no. blue badge parking spaces is sufficient to respond to need at this station.</p> <p>The Planning Committee Report (05.11.20) does not assert that the re-provision of 6 no. Blue Badge spaces is the sole consideration in respect of protected characteristic groups.</p>
35.	<p>Evening access to London’s cultural economy – Across these groups the TfL assessment fails to identify evening use for access to London’s cultural economy, which particularly impacts the elderly and disabled through denial of access and due to concerns for safety. There must surely be similar concerns regarding access for cultural use amongst young people and females in general (whilst recognising there are some reasons that are specific to women and which additionally impact their ability to access London Underground services should this proposal be approved).</p>	<p>Paragraph 8.10.19 sets out that surveys undertaken by the Applicant indicate the majority of survey respondents have alternatives to parking at the station available to them – as they live within 960m from a station, or 640m away from a bus stop for a route which serves Arnos Grove Station – providing continuing access to London’s cultural economy. Officers have given further consideration to proposed mitigation, which will also provide support for users who start their journey from a location greater than 960m from a station or 640m from a bus stop to Arnos Grove.</p>
36.	<p>TfL has a duty under the Public Sector Equality Duty, arising out of the requirements of the Equalities Act</p>	<p>The Officer assessment does not concur with the statement that the Applicant’s Equality Impact</p>

	<p>2010. Accordingly TfL has produced an Equality Impact Assessment to assess the impact of their proposed scheme, and that EqIA (even before its shortcomings are added in) is damning in its assessment of the critical negative impact of the proposals on the young, elderly, disabled, female and pregnant, each of which is a named group who should be protected by the Equalities Act 2010 and under Enfield's Public Sector Equality Duty.</p> <p>This has not been given any recognition in the agenda. Instead, the response of LBE officers has been to suggest that closing the car parks imposes the same level of disadvantage on all users, hence is not an equality issue; and to imply that as some people with disabilities regularly cycle, cycling is a viable means of accessing the station for members of all groups, hence closing the car parks is not an equality issue. These statements do nothing other than to clearly reveal LBE officers' urgent need for training in their understanding of equalities issues.</p>	<p>Assessment 'is damning in its assessment of the critical negative impact of the proposals on the young, elderly, disabled, female and pregnant'. Section 8.20 explains the proposed closure of the public car park is part of a broader proposal which seeks to replace the car park with a high-quality residential led proposal. Section 8.20 outlines potential adverse, neutral and positive effects in respect of the overall proposals. This is a robust consideration of issues. It is also aligned with the approach adopted by the Council when it originally considered redevelopment of the car parks as part of the NCAAP Equality Impact Assessment – Equality Analysis (2013).</p> <p>Section 8.20 of the 05.01.21 Planning Committee Report (Agenda Item 5), and other sections throughout the report (including Paragraphs 1.14, 1.15, 6.5, 8.6.1 – 8.6.3, 8.7.13, 8.10.35, 8.10.36 and 8.10.55) explain how the Officers have taken the Equality Act (2010) into account in the processing of applications 20/01049/FUL and 20/01188/LBC and preparation of the Planning Committee Report.</p>
<p>37.</p>	<p>To take just one, obvious, point: how is our seriously visually impaired member supposed to cycle to the station? And regarding elderly people: on Thursday 23rd of December there was torrential rain during the daytime in Enfield, followed by temperatures overnight falling to around 4 - 5°C. Are Enfield officers – and councillors who hold responsibility for planning decisions - seriously suggesting that 70 year olds should cycle in this weather? Or people with chronic health conditions? The same arguments hold with regard to long waits at night for a bus and perhaps a 10 or 15 minute walk at the end of the journey.</p>	<p>The 05.01.21 Planning Committee Report (Agenda Item 5) does not suggest that visually impaired people should cycle to the station. The previous Update Report did not suggest that visually impaired people should cycle to the station.</p>

<p>38.</p>	<p>In conclusion, the Equality Impact Assessment referred to by LBE officers and apparently relied upon for the judgements provided in their report, is revealed upon inspection to contain significant gaps in its analysis.</p> <p>Even accepting the limitations we noted, however, it nonetheless reveals that TfL analysts recognised the significant additional barriers these proposals put in the way of access to the station by many of the groups that should be protected by the Equality Act 2010 – and whose rights therefore should be protected by officers were they properly aware of, and compliant with, their duties under the Public Sector Equality Duty.</p> <p>The Equality Act has a significant and particular obligation on your committee. It is imperative that your officers take all possible actions to ensure that you are fully appraised of the implications of any proposal. Here, where the appraisal undertaken by TfL – albeit limited and with several demonstrable gaps – revealed significant impacts for passengers, officers do not appear to have properly drawn these to your attention.</p> <p>Worse, your officers do not appear to have undertaken any realistic appraisal of the situation, let alone undertaken their own Equality Impact Assessment, as is in fact demanded by the public sector equality duty.</p>	<p>Relevant information, material and evidence informing Officers assessment (including the matters summarised at Point 3 and Point 7 a) – j) above) was originally submitted to the Council in April 2020. This includes the Applicant’s Transport Assessment, Planning Statement and Design and Access Statement. This material was publicly available to be viewed during two rounds of formal consultation (May and October). A further press notice was published (16 December 2020). The Equality Impact Assessment submitted by the Applicant, has been considered, but not relied upon.</p> <p>Paragraph 8.20.20 of the Planning Committee Report explains the duty under Section 149 of the Equality Act 2010 is not a duty to prepare an Equality Impact Assessment. Section 149 of the Equality Act requires that public authorities have due regard to equality considerations when exercising their functions.</p> <p>Section 8.20 of the 05.01.21 Planning Committee Report (Agenda Item 5), and other sections throughout the report (including Paragraphs 1.14, 1.15, 6.5, 8.6.1 – 8.6.3, 8.7.13, 8.10.35, 8.10.36 and 8.10.55) explain how the Officers have taken the Equality Act (2010) into account in the processing of applications 20/01049/FUL and 20/01188/LBC and preparation of the Planning Committee Report.</p> <p>Paragraph 8.20.20 of the Planning Committee Report explains the duty under Section 149 of the Equality Act 2010 is not a duty to prepare an Equality Impact Assessment, but to have due regard to the issues. Notwithstanding this, the Applicant submitted an Equality Impact Assessment following a request by Officers.</p>
-------------------	--	--

	To say, effectively, that 'everyone will be negatively affected, so there is no equalities issue' simply serves to demonstrate the need for urgent training in improving these officers' understanding inequalities issues.	The Officers assessment does not concur with this statement. Officers have not assessed that 'everyone will be negatively affected, so there is no equalities issue'
Cockfosters Local Area Residents Association (24.12.2020)		
	Summary of Objection	Officer Response
39.	It appears that the Officers placed the Applicant's Equalities Impact Assessment in the public domain after the previously scheduled Planning Committee Meeting on 24 November. When did officers sign off their own assessment of the equalities implications, both explicit and implicit, and is there documentation to evidence this? Is there an audit trail that confirms that the Council has complied (and will comply) with its legal obligations, for example, through completed checklists or records? We understand that no EqIA was submitted with the Application documents and that Officers did not regard an EqIA as indispensable. This is surely not best practice.	Section 8.20 of the 05.01.21 Planning Committee Report (Agenda Item 5), and other sections throughout the report (including Paragraphs 1.14, 1.15, 6.5, 8.6.1 – 8.6.3, 8.7.13, 8.10.35, 8.10.36 and 8.10.55) explain how the Officers have taken the Equality Act (2010) into account in the processing of applications 20/01049/FUL and 20/01188/LBC and preparation of the Planning Committee Report.
40.	Transport for London's EqIA clearly states that the scheme has adverse impacts on those with protected characteristics under the Act but TfL proposes nothing that would 'advance equality of opportunity'. Statements make clear that disabled people and others with protected characteristics under the Act will be significantly impacted by the removal of the car park. TfL argues only that the six existing Blue Badge spaces will be retained. Preserving the status quo is not taking 'due regard' to advance 'equality of opportunity'; rather, it worsens the position of people with protected characteristics under the Act.	The Officer assessment does not concur with the statement that the Applicant 'proposes nothing that would 'advance equality of opportunity'. The proposed closure of the public car park is part of a broader proposal which seeks to replace the car park with a high-quality residential led proposal. Section 8.20 outlines potential adverse, neutral and positive effects in respect of the overall proposals.
41.	The Officers' update to Committee para 2.9 'Section 9 of the Main Report: Summary or relevant assessment' discusses TfL's Equality Impact Assessment but notably fails to take account of: TfL's conclusion that 'Removal of parking will be a significant impact to those who are less able to travel by other means';	Officers do not concur with the statement that they have 'acquiesced' to TfL's assessment. The Officer assessment (05 January 2021 Main Report) acknowledges the loss of 297 no. public car parking spaces has potential to give rise to differential effects. It recommends mitigation, but also considers a range of factors –

	<p>TfL’s risible statement (page 13) that ‘Improvements to the public realm should benefit the large group of disabled people who walk as part of their journeys, by removing barriers to travel’; TfL’s proposal to maintain the status quo of six Blue Badge spaces. In effect, Officers have acquiesced to TfL’s fundamentally flawed impact assessment.</p>	<p>including evidence of ‘alternative options. Please see Point No. 7 above. The 05.01.21 PCR also assesses that the Proposed Development would have positive impacts on those with protected characteristics under the Act (paragraphs incl. 8.20.13; 8.20.23; 8.20.26; 8.20.27).</p> <p>As set out paragraph 8.20.17 of the 05 January 2021 Planning Committee Report (05.01.21 PCR) Planning Officers have assessed the applications in the context of the adopted development plan and other material considerations (Section 70 of the TCPA and Section 38 of the Planning and Compulsory Purchase Act). Adopted Development Plan policies include Enfield policies (Section 7 of the 05.01.21 PCR) which promote sustainable transport options, improvements to the quality and safety of the public realm and reductions in congestion. Adopted and emerging Development Plan policies include London Plan policies which also aim to minimise car parking, reduce car-reliance and encourage non-car travel.</p>
<p>42.</p>	<p>Officers have also missed a glaring error and a contradiction in TfL’s EqIA that affect the ‘equality’ of the proposal in a wider sense. In the Introduction, TfL states that: The development will include homes at London Living Rents (LLRs) that are ‘comparative’ to social rents and significantly lower than London Affordable Rents. This is simply incorrect. LLRs are roughly double social rents.</p>	<p>Officers have not assessed LLR rent levels as equivalent to London Affordable Rents.</p>
<p>43.</p>	<p>The affordable housing provision will be located throughout the development. Again, this is incorrect. In the Arnos Grove development the affordable element would be located entirely in one block – a socially divisive ‘rich door, poor door’ approach.</p>	<p>Please see points Nos. 23 – 25 above. Officers are satisfied the scheme is tenure blind (see also Officer Response no. 24 below). Paragraph 8.6.38 of the 05.01.21 Planning Committee Report (Agenda Item 5) conclude that the scheme is tenure blind – with no clear distinction in terms of quality between private and affordable homes. The proposal is assessed, as a whole, to be well integrated, cohesive and</p>

		complementary in accordance with Enfield policy DMD 1.
44.	<p>Officers now include references to the PSED that were not included in their original report. This does not alter the fact that the development will worsen, not improve, the position of those with protected characteristics under the Act.</p> <p>Officers have chosen to emphasise 'mitigation', debateable though that mitigation is, and have totally ignored the Council's statutory duty to advance 'equality of opportunity'. Officers apparently believe that the Council 'has discharged its duty under the Act in consideration of this application' (para. 8.20.1) and summarise the Council's position in para 8.20.31.</p>	<p>The Officers assessment is set out at pages 55 – 142 of The Planning Committee Public Document Pak (05 January 2020). The main planning issues raised by the proposed development are set out at paragraph 8.1 of the report. Officers do not concur with the statement that the <i>'development will worsen, not improve, the position of those with protected characteristics under the Act.'</i> Officers have assessed that the proposed development will cumulatively deliver benefits which will have potential effects in respect of protected characteristic groups.</p> <p>Officers have not solely focused on mitigation – although appropriate mitigation is considered reasonable in seeking to advance equality and minimise and mitigate potential differential effects. The PSED is to have due regard to the need to achieve the statutory goals, not a duty to achieve a result.</p> <p>As set out paragraph 8.20.17 of the 05 January 2021 Planning Committee Report (05.01.21 PCR) Planning Officers have assessed the applications in the context of the adopted development plan and other material considerations (Section 70 of the TCPA and Section 38 of the Planning and Compulsory Purchase Act). Adopted Development Plan policies include Enfield policies (Section 7 of the 05.01.21 PCR) which promote sustainable transport options, improvements to the quality and safety of the public realm and reductions in congestion. Adopted and emerging Development Plan policies include London Plan policies which also aim to minimise car parking, reduce car-reliance and encourage non-car travel.</p> <p>As summarised at Section 1.0 and Section 8.20, Officers have taken account of a range of considerations in considering of the submitted applications and preparing the report. Please see No. 7 above.</p>

		Officers are satisfied that consideration of the proposed development has had due regard to the need to achieve the statutory goals of the Equality Act. As set out at Paragraph 8.20.31, Members should also take account of the provisions of the Human Rights Act 1998 as they relate to the application and must also be mindful of the Local Planning Authorities' legal duty under the Equality Act 2010.
45.	Officers are unable to advise the Committee that approving the Application will NOT contravene the Act. TfL's EqIA states that the position of those with protected characteristics will be 'significantly impacted' and the Officers have NOT concluded otherwise. They effectively conclude 'You decide'.	<p>This statement does not reflect the assessment and recommendations set out in the Planning Committee Report. Officers are satisfied that consideration of the proposed development has had due regard to the need to eliminate discrimination and advance equality of opportunity, as set out in section 149 of the Equality Act 2010.</p> <p>The approach set out in the Planning Committee Report is robust and sound. Officers are making a recommendation in this case. As set out at Paragraph 8.20.31, Members should also be mindful of the Local Planning Authorities' legal duty under the Equality Act 2010 and also take account of the provisions of the Human Rights Act 1998 as they relate to the application.</p>
46.	As is summarised in para. 8.2.47: 30% of the affordable homes at Arnos Grove are proposed at rent levels equivalent to London Living Rent for the Southgate Green ward where the site is located. Officers are satisfied these units represent genuinely affordable rent units – particularly in respect of Southgate Green ward. This effectively concedes that the rents will be unaffordable for the residents of much of Enfield, particularly wards such as Edmonton Green, where the greatest housing need exists. Nor does it provide the percentage of family accommodation that is required. In our paper of 18 December, we included two comparative tables to show the various home sizes in the proposed Application and the relevant rents. To	Please see Points Nos. 16 – 21 above. The Applicant is not proposing social rent or London Affordable Rent homes. London Affordable Rent and Social Rent homes are for households on low incomes where the rent levels are based on the formulas in the Social Housing Regulator's Rent Standard Guidance. The 05.01.21 Planning Committee Report (Agenda Item 5) explains the Affordable Housing proposed is intermediate. As explained at 8.3.42 the proposed Discounted Market Rent (non-LLR) affordable housing can be more affordable than Shared Ownership. Shared ownership has a higher household income cap of £90,000.

reiterate, the scheme contains: No homes at Social Rent; Very few homes at London Living Rent; Little prospect these homes will be affordable for key workers.	
--	--

- 1.2. The Mayor has formally approved a new London Plan, the 'Publication London Plan'. It has been prepared to address the Secretary of State's directions of 13 March 2020 and 10 December 2020 to the Publication London Plan (December 2020). Once the Mayor has received confirmation from the Secretary of State that he is content for the Publication London Plan to be published, the Mayor will proceed with the final steps to publish the final London Plan. On publication it will become the Spatial Development Plan for London and part of the statutory Development Plan for Greater London. Relevant London Plan (ItP) policies are set out at 7 of the Main report.

2. Planning Balance and Conclusion

- 2.1.1. The Proposed Development accords with the development plan, as a whole. Officers consider it therefore benefits from the statutory presumption in favour of the development plan as set out in section 38(6) of the Planning and Compulsory Purchase Act 2004.
- 2.1.2. Paragraphs 10 and 11 of the NPPF set out there will be a presumption in favour of Sustainable Development. The latter paragraph states that: For decision-taking this means: approving development proposals that accord with an up-to-date development plan without delay; or where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless: i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.
- 2.1.3. It is not considered that any adverse impacts of the proposal would significantly and demonstrably outweigh the benefits outlined in the main report and this update report. Officers recommend approval, subject to the recommended conditions and s106 planning obligations (20/01049/FUL); and grant of Listed Building Consent (20/01188/LBC).

Jacob Gemma

From: Allison De Marco <[REDACTED]@enfield.gov.uk>
Sent: 09 December 2020 09:54
To: Colin Wharry; Campbell Lee
Cc: Andy Higham; Al Eggeling (Alan Baxter)
Subject: RE: Arnos Next Steps

Thanks Colin.

Coco has welcomed the further information received and feels a further meeting is not required for now.

She will get in touch if she has any further questions.

Thank you, Allison

Allison De Marco MRTPI
Planning Decisions Manager – Strategic Applications
Planning Service
Place Department
Enfield Council

E: [REDACTED]@enfield.gov.uk
W: www.enfield.gov.uk

From: Colin Wharry <[REDACTED]@ml-architects.com>
Sent: 09 December 2020 09:17
To: Allison De Marco <[REDACTED]@enfield.gov.uk>; Campbell Lee <[REDACTED]@tfl.gov.uk>
Cc: Andy Higham <[REDACTED]@enfield.gov.uk>; Al Eggeling (Alan Baxter) <[REDACTED]@alanbaxter.co.uk>
Subject: RE: Arnos Next Steps

Hi Allison, Apologies, I don't work Tuesdays, just picking this up. I'm still free at 10 if you want to meet. I'll arrange to have DAS sent over today.

Colin Wharry
Associate | Architect

MACCREANOR LAVINGTON

maccreanorlavington.com

The information in this email does not necessarily represent the official policy of Maccreanor Lavington. This email is confidential and any disclosure, copying or distribution of it may be unlawful. If you have received this email in error please notify the sender immediately and delete the material from your system.

From: Allison De Marco <[REDACTED]@enfield.gov.uk>
Sent: 08 December 2020 10:48
To: Colin Wharry <[REDACTED]@ml-architects.com>; Campbell Lee <[REDACTED]@tfl.gov.uk>
Cc: Andy Higham <[REDACTED]@enfield.gov.uk>; Al Eggeling (Alan Baxter) <[REDACTED]@alanbaxter.co.uk>
Subject: RE: Arnos Next Steps

Thank you Colin.

I have spoken with Coco, who will be briefing her committee this afternoon (2pm) in advance of their next committee meeting on the 14th December. She will discuss whether the scheme should return to committee to explain the further details discussed just now. Alan Powers has a particular interest in the proposals.

Colin, can you please send Coco a **link to the full DAS and TVIA documents** ([REDACTED] c20society.org.uk).

I will provide my own separate follow-up response, but you may wish to note that illustrative images explaining the operational access requirements of the station are set out at Pages 49, 84 – 85, 90 – 91. You may wish to note DAS images are illustrative. (i.e. some of the DAS plans show the southern building line for Block A01 further north than currently proposed / shown on the drawings submitted for approval).

Kind regards,
Allison

Allison De Marco MRTPI
Planning Decisions Manager – Strategic Applications
Planning Service
Place Department
Enfield Council

E: [REDACTED] [enfield.gov.uk](mailto:[REDACTED]@enfield.gov.uk)
W: www.enfield.gov.uk

From: Colin Wharry <[REDACTED]@ml-architects.com>
Sent: 08 December 2020 10:08
To: Campbell Lee <[REDACTED]@tfl.gov.uk>
Cc: Allison De Marco <[REDACTED]@enfield.gov.uk>; Andy Higham <[REDACTED]@enfield.gov.uk>; Al Eggeling (Alan Baxter) <[REDACTED]@alanbaxter.co.uk>
Subject: Re: Arnos Next Steps

Hi Lee, Allison,
Yes I'm free tomorrow until 11 if necessary.
Agree with Allison's justification below and have nothing further to add from a heritage perspective. See small extract from ABAs heritage statement which helps support this.
We have been through several iterations of the square with LBE and have responded to 20th C concerns about the pergola. We feel this is the optimum position for the single storey building, both screening the BOH of station and containing the square, bringing active frontage onto the northern edge, while still retaining the prominence of the drum.
Allison, can you please send a meeting link if you want me to attend tomorrow?
Best
Colin

4.3 Impact Assessment

4.3.1 Layout of buildings

The layout of buildings across the two sites has been designed to station building to maintain the building's prominence in the street of the ticket hall drum against the sky to be appreciated to multiple

Plot A01, the southern building on Site A, has been set back away from the public square in the location of Holden's original car park. This is preserving a significant element of Holden's original design which is a transport interchange, and in maintaining views of the ticket hall along Bowes Road. Setting Plot A01 back from the station preserves the primary building within the landscape. Part of Plot A01 is brought to the western corner of the station building. This element has been kept to the strong geometry and massing of the adjacent station's ground floor single-storey element will play an important role in defining the space adjacent to the station, a role currently performed by a curved wall to be removed (see Section 4.3.4). Plot A02 is largely concealed in view so its impact on the setting of the station is negligible.

The position of Plot B01, the southern building on Site B, has evolved along the southern boundary of the Site. Holden designed Arnos Grove with Bowes Road, with the walls extending out from the main station entrance

Sent from my iPhone

Colin Wharry
Associate | Architect

MACCREANOR LAVINGTON

63 Gee Street, London EC1V 3RS

Vijverhofstraat 47, 3032 SB Rotterdam

maccreanorlavington.com

The information in this email does not necessarily represent the official policy of Maccreanor Lavington. This email is confidential and any disclosure, copying or distribution of it may be unlawful. If you have received this email in error please notify the sender immediately and delete the material from your system.

On 8 Dec 2020, at 9:33 am, Campbell Lee <[REDACTED]@tfl.gov.uk> wrote:

Hi Allison

I am not free at 10am but I will check if anyone is available at short notice to join you. **Alice/Colin** are wither of you free at 10am?

If not then I am sure Allison can feed back after the meeting.

Best

Lee

From: Allison De Marco <[REDACTED]@enfield.gov.uk>
Sent: 07 December 2020 18:03
To: Campbell Lee <[REDACTED]@tfl.gov.uk>; Andy Higham <[REDACTED]@enfield.gov.uk>
Cc: Rebecca Crow <[REDACTED]@graingerplc.co.uk>; Vincent Lacovara <[REDACTED]@enfield.gov.uk>
Subject: RE: Arnos Next Steps

Lee,

Is your team available to discuss with Coco at **10am tomorrow**? Unless you object, I suggest starting with the LPA's assessment, and you / your team follow.

I'll be brief but intend to explain that the Officer assessment has considered the benefits of the current alignment of Block A01's southern façade (and height of the modest one-storey element) – which Officers consider positively preserves the dominance of the station drum, and also beneficially preserves glimpses towards the ridgeline well beyond the station to the north-east (gap between existing station drum and 4 storey element of Block A01). The current alignment of the Block A01 also positively conceals much of the station's BoH areas (including plant compound)– which currently form part of the station's setting, and detract from the station building/drum.

Am conscious that given the number of documents, Coco may not have come across details that explain that the area immediately to the north-west of the station building is used for LuL maintenance / operational access, and therefore how the alignment of Block A01's southern building line provides a benefit in reducing the visual prominence of those areas. In my view setting back the southern façade of Block A01 would reveal more of the station's BoH areas, including plant compound – which is not preferred.

Pages 49, 84 – 85, 90 – 91 of the DAS are helpful in making this point.

Can I please ask that if your team do intend on presenting material, including views of the proposed square and Block A01 that your team please uses 'View A' from the TVIA, rather than the non-TVIA CGIs of the square.

Please let me know if you have any questions or wish to discuss.

Kind regards,

Allison

Allison De Marco MRTPI
Planning Decisions Manager – Strategic Applications
Planning Service
Place Department
Enfield Council

E: [REDACTED]@enfield.gov.uk
W: www.enfield.gov.uk

From: Campbell Lee <[REDACTED]@tfl.gov.uk>
Sent: 07 December 2020 15:18
To: Allison De Marco <[REDACTED]@enfield.gov.uk>; Andy Higham <[REDACTED]@enfield.gov.uk>
Cc: Rebecca Crow <[REDACTED]@graingerplc.co.uk>; Vincent Lacovara <[REDACTED]@enfield.gov.uk>
Subject: RE: Arnos Next Steps

Allison – thanks – good news matters are now covered.

Have you heard from Coco?

Andy – I would appreciate a quick call with you tomorrow – we have a meeting scheduled for this Friday with my director, Nesil and Sarah (and perhaps Vincent) and I wanted to be clear of a few things before I brief at our end for that meeting.

Best

Lee

From: Allison De Marco <[REDACTED]@enfield.gov.uk>
Sent: 04 December 2020 14:58
To: Campbell Lee <[REDACTED]@tfl.gov.uk>; Andy Higham <[REDACTED]@enfield.gov.uk>
Cc: Rebecca Crow <[REDACTED]@graingerplc.co.uk>
Subject: RE: Arnos Next Steps

Hi Lee and Rebecca,

Thank you for the details below, which cover most of the matters set out in my email of 27 November.

In terms of next steps, I am updating the report – to hand to Andy for review by close next week.

In the interim, I have asked Coco at the 20th Century if she is available to meet either Monday or Tuesday – and will let you know when she responds.

Andy may have some availability on Tuesday afternoon (16.30) – but will leave for Andy to confirm / respond.

Kind regards,
Allison

Allison De Marco MRTPI
Planning Decisions Manager – Strategic Applications

Planning Service
Place Department
Enfield Council

E: [REDACTED]@enfield.gov.uk
W: www.enfield.gov.uk

From: Campbell Lee <[REDACTED]@tfl.gov.uk>
Sent: 03 December 2020 21:00
To: Andy Higham <[REDACTED]@enfield.gov.uk>
Cc: Rebecca Crow <[REDACTED]@graingerplc.co.uk>; Allison De Marco <[REDACTED]@enfield.gov.uk>
Subject: RE: Arnos Next Steps

Andy / Allison

Hopefully the information provided below is helpful and closes out the remaining issues/questions.

It would be good to have chat early next week to figure out the direction of travel/next steps for 5 Jan.

Regards

Lee

From: Rebecca Crow <[REDACTED]@graingerplc.co.uk>
Sent: 03 December 2020 17:07
To: Allison De Marco <[REDACTED]@enfield.gov.uk>; Campbell Lee <[REDACTED]@tfl.gov.uk>; Andy Higham <[REDACTED]@enfield.gov.uk>
Cc: Brown Mary <[REDACTED]@tfl.gov.uk>; Dimitris Tsompanidis <[REDACTED]@graingerplc.co.uk>
Subject: RE: Arnos Next Steps

Hi Allison

Hope you're well. Please see our responses below to your email of 27th November. If you require anything further then please advise or if it would be helpful to have a meeting to further discuss any of the below.

Timeframes: please could you confirm timeframes for finalising the report for the 5th Jan Committee?

Section 106: We shared these details with you last week, it would be good to understand timeframes for this as we would really like to make some progress over the next month if possible.

Details / re-confirmation:

- 1. EQIA:** TfL provided this to LBE on 30 November 2020. We are happy for this to be uploaded as a supporting document.
- 2. Disabled Parking Utilisation:** Please refer to the attached note from our transport consultants which summarises the surveys undertaken in October 2019. As far as we are aware and having made enquiries - TfL does not have any information which points to insufficient blue badge provision at this station.

In addition to this TfL has looked at how the level of disabled parking compares with other car parks across its portfolio of a similar scale to Arnos Grove car parks. This

review has shown that the level of disabled parking provided is fairly consistent averaging around 6 spaces (as at Arnos) or around 2% of overall provision. This, along with the note attached should provide you with the confidence you need that the level of Blue Badge parking provision being retained at Arnos Grove is acceptable.

3. **Brown Badge:** CLL do not believe there is a policy or any other justification for provision of brown badge parking within this site.
4. **Passenger Profiling:** TfL has looked into this and have reached out to a number of teams across the business including its Diversity and Inclusion Team. TfL doesn't believe the data sources held can provide the breakdown or comparisons requested. TfL will continue to look into this over the coming weeks and will share anything relevant prior to committee.

Having considered your point re: Arnos Grove not being the 'station of choice' for some groups we are not sure that this argument is the correct one to make in this instance. It may be helpful to note that the majority of TfL stations do not have car parks. In addition not all of TfL's Stations are step free. Whilst an increasing number are becoming step free TfL has and continues to work hard to ensure that its entire network is as accessible to as many Londoners as possible, including those with mobility and other needs, for example all of TfL's buses are accessible. The ability to park or not at a station should not be the determining factoring in 'station choice', whilst some users with specific needs may choose to drive to stations where parking is available and depending on their needs there are other ways of getting to and moving through stations. TfL's website has comprehensive details on transport accessibility and the measures and initiatives offered by TfL to help those who need to access and use the public transport system.

This includes information on *planning an accessible journey, getting help from staff, Assisted Travel Services* and how to access these and *Travel Mentoring* to help build knowledge and confidence for people to use all our services. Amongst other things TfL set out advice and guidance for step free access across the network and includes guidance for pregnant women and women with children who want to use public transport. <https://tfl.gov.uk/transport-accessibility/>

5. **Are there site photos (pre-Covid) of the blue badge spaces, showing typical use** – please see attached Disabled Parking note produced by Pell's.
6. **Confirm dates of Disabled Parking utilisation surveys and if post August 2019:**
Yes – these surveys took place in October 2019.
7. **Current public cycle parking provision:**

Location	No. of public cycle parking spaces
Adjacent to station building	2 (2x cycle stands)
Station Interchange	20 (10 x Sheffield Stands)
Station Interchange (Enfield Cycle Hubs)	16 (2 x cycle hubs)
TOTAL SPACES	38 spaces

<image001.jpg>

Proposed new public cycle parking provision:

Location	No. of cycle parking spaces
Station Interchange	20 (10 x Sheffield stands)