
TRENT PARK

ENFIELD

THE FORMER MIDDLESEX UNIVERSITY CAMPUS TRENT PARK

PLANNING STATEMENT



Our vision for Trent Park is a strong, integrated community where people know one another and welcome the public to enjoy the safe and beautiful setting, where every detail is designed to the highest quality. Residents and visitors will stay and contribute to the rich history and share the tranquil open spaces.

SEPTEMBER 2016

Berkeley
Designed for life



Nathaniel Lichfield
& Partners
Planning. Design. Economics.

**Former Middlesex University Campus
Trent Park**

Planning Statement

Berkeley Homes (North East London) Ltd

16 September 2016

14713/IR/SH

Nathaniel Lichfield & Partners
14 Regent's Wharf
All Saints Street
London N1 9RL

nlplanning.com

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Registered Office:

14 Regent's Wharf

All Saints Street

London N1 9RL

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1.0 Introduction

1.1 This Planning Statement has been prepared on behalf of Berkeley Homes (North East London) Limited (hereafter referred to as 'Berkeley') to assist the London Borough of Enfield (LBE) in its consideration of an application for planning permission and listed building consent for development of the Former Middlesex University Campus Trent Park (hereafter referred to as the 'Application Site'). The application seeks the following (hereafter referred to as the 'Proposed Development'):

“Full planning permission for the demolition of Bevan Hall, Lakeview, Wisteria Building, Jebb Building, the Student Union, Gubbay Hall, the Sports Hall, Sassoon Hall, the Bothy, South Lodge and ancillary structures. Restoration and change of use of the site’s heritage assets from institutional use (Use Class D1 and C2) to residential use (Use Class C3), with part of the ground floor and basement of the Mansion House in community use (Use Class D1). Change of use and extension to the Orangery for leisure use (Use Class D2). Construction of new residential development (Use Class C3) in the form of houses and apartments with associated car and cycle parking (surface, basement and private garages) and amenity space, with a total provision of 262 dwellings. Comprehensive landscape restoration scheme to deliver publically accessible amenity space, to include sustainable drainage features, planting and tree works. Refurbishment of existing outdoor tennis courts. Various vehicular, cycle and pedestrian routes through the site. Works to formalise the hockey club’s car parking facilities. Alterations to Snakes Lane at the junction with Bramley Road to include a turning circle with bus shelter, garage and cycle parking, along with new pedestrian crossings. All associated infrastructure works.

Listed building consent for the demolition of extensions to the Mansion House and Orangery, followed by various works to the Mansion House and its terrace and forecourt, the swimming pool/Orangery, Wisteria Walk and the Registered Park as part of their restoration, conversion and/or extension”.

1.2 The purpose of this Planning Statement is to assess the Proposed Development against the relevant local, London-wide and national planning policy and other material considerations. To do this, it draws from other documents and information accompanying the planning and listed building consent applications (hereafter referred to as the 'application') to which the reader should refer for further detail.

1.3 By way of context, the site was vacated by Middlesex University in 2012 and purchased by the Allianze University College of Medical Sciences (AUCMS) in 2013. AUCMS went into liquidation in November 2014, leaving the site with an uncertain future. The former university campus, which had been vacant for three years, was put up for sale and acquired by Berkeley in September 2015. Berkeley has been working with a team of specialist advisers to secure a long-term solution for this Major Developed Site in the Green Belt, seeking to develop a viable scheme which both respects the Green Belt and the site’s

heritage assets, based on a conservation and landscape-led approach which will benefit current and future generations. As set out under the above description of the Proposed Development, Berkeley's plans for the site comprise residential-led development (Use Class C3) with some community uses including a museum/café/event space (Use Class D1) and a gym (Use Class D2), focused on the restoration of the site's listed heritage assets and landscape including the Mansion House.

- 1.4 The proposals have been subject to comprehensive pre-application discussions with the London Borough of Enfield (LBE) (under a Planning Performance Agreement), Urban Design London (as part of their design review panel service), Historic England (through their Enhanced Advisory Service), the Greater London Authority (GLA) and with local groups and the local community. Their feedback has informed the design evolution and the final proposals set out in this application, as summarised at Section 3.0 of this Planning Statement and in further detail within the Statement of Community Involvement and the Design & Access Statement. In addition, the proposals have been reviewed by statutory consultees as part of the scoping of the Environmental Impact Assessment (EIA) (also detailed in Section 3.0).

Application Scope

- 1.5 This Planning Statement deals with site specific and technical planning issues that need to be considered through the determination process and how they respond to relevant planning policy and other material considerations. In doing so, it draws from the conclusions of the following technical documents which accompany this application:

- 1 Design & Access Statement
- 2 Landscape Design Statement
- 3 Transport Assessment
- 4 Travel Plan
- 5 Delivery and Servicing Plan
- 6 Outline Construction Logistics Plan
- 7 Sustainability Statement
- 8 Energy Statement
- 9 Utilities Strategy
- 10 Statement of Community Involvement
- 11 Environmental Statement, comprising:
 - Non-Technical Summary (NTS)
 - Volume 1 – Main Assessment
 - Volume 2 – Landscape, Visual Impact, Built Heritage and Historic Landscape Assessment
 - Volume 3 – Technical Appendices

- 1.6 The detailed structure of the Environmental Statement (ES) along with its technical appendices is set out below.

ES Volume I: Environmental Statement	ES Volume II: Landscape, Visual Impact, Built Heritage and Historic Landscape Assessment	ES Volume III: Technical Appendices
<ul style="list-style-type: none"> • Chapter 01: Introduction • Chapter 02: EIA Methodology • Chapter 03: Alternatives and Design Evolution • Chapter 04: The Proposed Development • Chapter 05: Demolition, Construction and Refurbishment • Chapter 06: Socio-Economics • Chapter 07: Transportation and Access • Chapter 08: Noise and Vibration • Chapter 09: Air Quality • Chapter 10: Ground Conditions • Chapter 11: Water Resources, Drainage and Flood Risk • Chapter 12: Archaeology (Buried Heritage) • Chapter 13: Ecology • Chapter 14: Effect Interactions • Chapter 15: Residual Effects and Conclusions • Chapter 16: Glossary of Terms 	<ul style="list-style-type: none"> • Part 1: Landscape and Visual Impact Assessment • Part 2: Heritage Assessment (with Historic Landscape Assessment and Built Heritage Assessment included as built-in appendices) • Part 3: Verified Views (Existing and Proposed) 	<ul style="list-style-type: none"> • Appendix A: EIA Scoping and Consultation; • Appendix B: Operational Waste and Recycling Management Strategy • Appendix C: Health Impact Assessment • Appendix D: Transport (including traffic data and any consultation responses); • Appendix E: Noise and Vibration (including any data, model outputs or N&V specific glossary of terms); • Appendix F: Air Quality (including any data, model outputs, AQ neutral assessment etc.); • Appendix G: Ground Contamination; • Appendix H: Flood Risk Assessment and Outline Drainage Strategy; • Appendix I: Archaeological Desk-based Assessment; • Appendix J: Ecology (including all ecology reports); and • Appendix K: Arboriculture (including Arboricultural Impact Assessment and Tree Protection Plan)

Report Structure

- 1.7 This Planning Statement comprises the following sections:
- Section 2.0 describes the site and its context and summarises the background to this proposal, including the site's planning history;
 - Section 3.0 sets out the scheme's design evolution, pre-application consultation and the EIA Scoping;
 - Section 4.0 provides a brief overview of the proposals;

- Section 5.0 identifies the planning policy context and key tests relevant to the determination of this planning application;
- Sections 6.0-13.0 assess the proposed development against each of the key policy tests and other relevant considerations;
- Section 14.0 deals with planning obligations and draft Heads of Terms; and
- Section 15.0 concludes there are compelling reasons for LBE to grant planning permission and listed building consent for the proposed development.

2.0 **Site Background**

Site and Context

- 2.1 The Application Site comprises an area of 22.7 hectares which sits within the wider Trent Country Park (approximately 380 hectares) with a rich history dating back to the early 12th Century. It is located to the north of Oakwood and the east of Cockfosters and sits within London's Metropolitan Green Belt.
- 2.2 The main vehicular access is via Snakes Lane, a private road within Berkeley's ownership, which runs from Bramley Road (A110) to the south. There is a private route through Trent Country Park to the west (Lime Avenue), but this is only accessible by foot and cycle, with emergency vehicle access. The site has a PTAL rating of zero. However, whilst this suggests a very poor level of access to public transport, this rating does not take account the proximity of Oakwood and Cockfosters Underground stations (as these are both slightly over 1km from the site) or the bus services at Cockfosters Road and Bramley Road. Oakwood and Cockfosters stations (served by the Piccadilly Line) are both within an 18 minute walk (1.3km) and six regular daytime buses and one night service operate locally with frequencies of up to every eight minutes during peak times.
- 2.3 The Application Site contains a number of historic buildings, statues and sculptures, which sit alongside large post-war buildings. The Mansion House itself is listed Grade II and the surrounding parkland is Grade II registered, as well as being designated a Conservation Area. A number of statues and sculptures within the parkland are of historic value and are listed in their own right. In total there are approximately 25 buildings and historic statues scattered across the site, including buildings associated with the historic use as a Country Estate, some of which are identified as positive contributors to the Trent Park Conservation Area.
- 2.4 Alongside the Mansion House and these other more historic buildings, the Campus includes a number of post-war higher educational buildings, mostly dating to the 1960s and 1970s, after the site became a teacher training school following its acquisition by the Council after the Second World War. There are also a number of unused outdoor tennis courts at the western extent of the site.
- 2.5 Beyond the application site, but within Berkeley's ownership, is the Southgate Hockey Club, which is subject to a long lease agreement. The Hockey Club's informal car parking area, adjacent to Snakes Lane, is included within the red line boundary to enable improvements to be made to formalise the parking arrangements.
- 2.6 Immediately adjoining the site's western boundary is the Wildlife Rescue Centre which includes a children's play area. There are also private dwellings to the south-west (Rookery Cottages and Dairy House), south (South View and North View) and south-east (on Southern Lane). The Trent Park Golf Club lies

to the south, farmland/woodland to the east, a lake and parkland to the north and further woodland/parkland to the west.

Designated Heritage Assets

2.7 The Application Site includes a number of listed buildings as follows:

- 1 Trent Park House (Mansion House) - Grade II
- 2 Orangery with front terrace and wall with Sphinxes - Grade II
- 3 Urn on pedestal 120m north west of Trent Park - Grade II
- 4 Statue 12m north west corner of terrace at Trent Park - Grade II
- 5 Sculptures to north east and north west of terrace of Trent Park - Grade II
- 6 Statue approximately 20m north east corner of terrace at Trent Park – Grade II
- 7 Statue of Actaeon to left of main entrance to Trent Park – Grade II
- 8 Pair of gate piers approximately 25m to south west of main entrance to Trent Park – Grade II
- 9 Gate pier with gate at south east of Wisteria Walk at Trent Park – Grade II
- 10 Monument to south west of Trent Park near the east end of the Avenue – Grade II
- 11 Pergola, known as Wisteria Walk to south east of former Stable Block at Trent Park – Grade II
- 12 Trent Park Registered Park – Grade II
- 13 Pair of sphinxes flanking steps on east side of terrace at Trent Park – Grade II
- 14 Statue of Venus to right of main entrance to Trent Park – Grade II
- 15 Statue on north west end of terrace at Trent Park (Grade II)

2.8 The application site also forms part of the Trent Park Conservation Area, which was designated in 1973 and extended to include Cockfosters Cottages in 1990 and the area around Chalk Lane in 1993. It is focused on Trent Park House and its estate, and includes the parkland landscape, gardens surrounding the mansion, ancillary buildings and farmland associated with the estate.

Non-Designated Heritage Assets

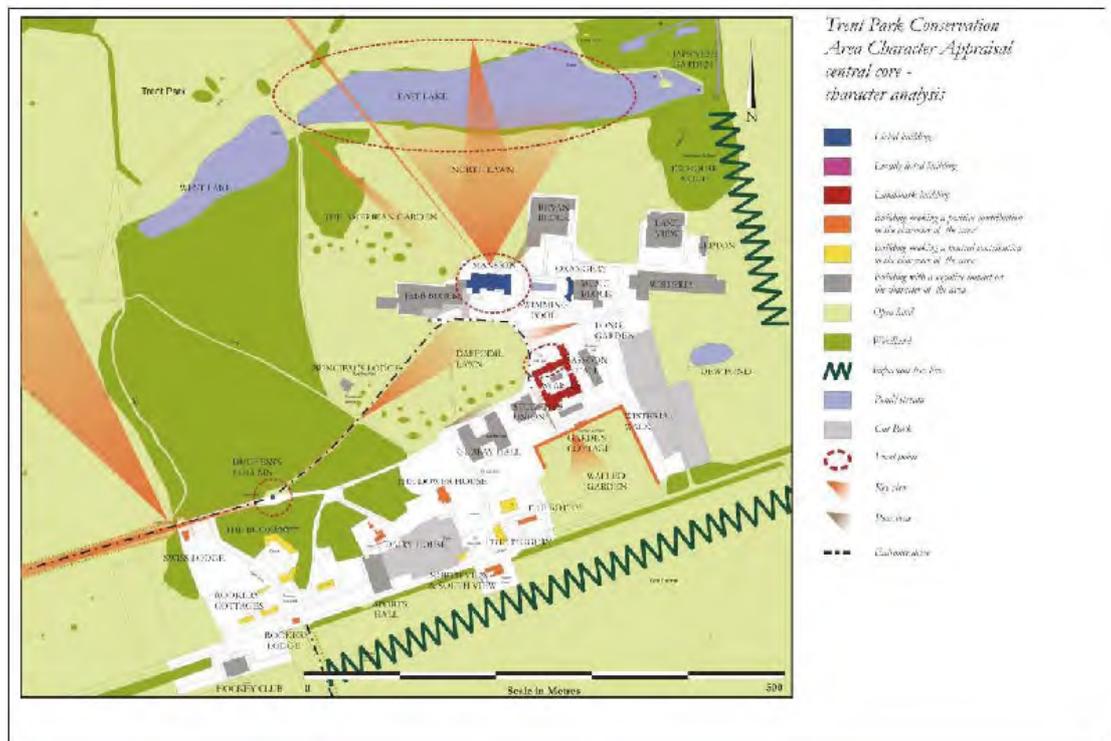
2.9 The following buildings are identified as making a positive contribution to the character and appearance of the Trent Park Conservation Area and should be treated as non-designated heritage assets:

- 1 The Stables (built in the late 19th Century and extended in Victorian gothic style to form a courtyard during the 1860s) – described as a ‘landmark building’ in the Conservation Area Character Appraisal

- 2 Garden Cottage (built by the Bevans during the late 19th/early 20th Century)
- 3 Walled Garden (dates to the first phase of the Mansion in the 1780s)
- 4 The Dower House (built by the Bevans during the late 19th/early 20th Century)
- 5 The Bothy (built in the early 20th Century)
- 6 Rookery Lodge (built by the Bevans during the late 19th/early 20th Century)
- 7 Swiss Lodge (outside of the red line application boundary and under separate ownership)
- 8 Dairy House (also known as Dairy Cottage) (outside of the red line application boundary and under separate ownership)
- 9 North View & South View (outside of the red line application boundary and under separate ownership)

2.10 Figure 2.1 includes a map extract from the London Borough of Enfield's Conservation Area Character Appraisal (2015), which details the heritage assets on the site, as well as positive contributors and those which are considered to detract. Trent Park and the Mansion Terrace are identified on Historic England's Register of Heritage at Risk.

Figure 2.1 Extract of the Application Site



Source: Trent Park Conservation Area Appraisal Central Core Character Analysis (2015)

Site History

Mansion House Early History

- 2.11 A villa was first commissioned on the estate by Sir Richard Jebb, physician to King George III, in the late 18th century. The royal architect, Sir William Chambers, was appointed to build this house, and parts of it still remain today. The villa was extended and amended by later owners until Francis Bevan undertook a major remodelling of the house in the 1890s. The house and gardens were subsequently subject to further major change when Sir Philip Sasson inherited Trent Park and re-clad the entire house in a 'Wrenaissance' style using bricks and doorcases from demolished London mansions (1925-31). The history of the Mansion House is set out in detail in Volume II of the ES.
- 2.12 The Mansion House is currently three storeys with a basement. It comprises red brick with stone quoins, bands and window architraves. Thirteen sash windows expand across the front elevation. The central door case has a Corinthian entablature with serpentine open pediment. A balustrade stretches along the front elevation to the basement areas and classical statues and urns are strategically positioned around the elevations.
- 2.13 The terrace areas immediately adjacent to the House were put on the Heritage at Risk Register in 2006 as they were at immediate risk of further rapid deterioration or loss of fabric. These have been protected and stabilised by Berkeley to prevent further deterioration whilst proposals are drawn up for the mansion and the works taken forward.
- 2.14 The Mansion House is architecturally significant for its early 20th century 'Wrenaissance' style, part of which was designed by architect Philip Tilden. Lenygon and Morant also designed the 18th Century style interiors. The symmetrical red brick facades, surrounded largely by open space, presents an imposing frontage both to the front and to the rear of the re-faced building. Internally there are interiors of decorative value, including the entrance hall and staircase, the inter-connecting reception rooms, panels of Chinese wall-paper mounted in the Saloon, and painted decoration by Rex Whistler in the end rooms. The other rooms of significance in terms of their historic fabric and precedence are the Green Room, the Blue Room and Sassoon's/Kendrick's office. However, the remaining rooms on the ground floor, and the entirety of the upper floors, have been much altered since the War years and have no remaining features of value.
- 2.15 The surrounding landscape of lawns and lakes were designed to intensify the grandeur of the Mansion House within its parkland setting. Views through the park were designed to create impressive formal vistas, and the terrace plays an important role in connecting the House to the surrounding parkland; by wrapping around the north and east sides it leads the eye through the distant landscape beyond. This originates from prior to the Bevan period and then the works to the landscape undertaken by the Bevans and Sir Phillip Sassoon.

The Estate's Recent History

- 2.16 Following the Sassoon period at Trent Park, the estate was requisitioned by the War Office during World War II to be used as a highly specialised prisoner of war camp, run by a Secret Service unit known as MI19. The Mansion House was used for room-bugging, eavesdropping and passive manipulation techniques to gain intelligence to assist the war effort.
- 2.17 In 1947, the estate was taken over by the Ministry of Education and the House was used as a teacher training facility (Trent Park College) from 1950 onwards, which then became Middlesex Polytechnic in 1974 and Middlesex University in 1992. During this period, a number of modern institutional buildings were constructed to provide university teaching and accommodation space which detract from the setting of the site's heritage assets including:
- 1 Gubbay Hall
 - 2 Students Union
 - 3 Music Block
 - 4 Wisteria building
 - 5 Repton building
 - 6 Bevan Block
 - 7 Jebb Block
 - 8 Lake View
 - 9 Sports Hall
 - 10 Sassoon Hall
- 2.18 Since the University vacated the site in 2012, its condition has significantly deteriorated. The landscaping is unkempt and overgrown, the listed heritage assets have fallen into a poor state of repair and large areas are now unsafe to access.
- 2.19 Berkeley purchased the site in September 2015 and is working with a team of specialist advisers to secure a long-term solution for the site and its heritage assets. To date, Berkeley has undertaken urgent works such as the propping of the Mansion House terrace, erecting temporary fencing and fitting alarms and fire detectors for health and safety reasons, as well as works to Snakes Lane. Berkeley has also undertaken significant consultation with other parties with an interest in the site such as Historic England, Enfield's Conservation Team, the Enfield Parks Team, Save Trent Park Campaign, Friends of Trent Country Park, Southgate Hockey Club, the Wildlife Centre and other local businesses, groups and the community.

Planning History

- 2.20 The site has been subject to various small scale applications for planning permission and listed building consent over the years and these have not been referenced here given their minor nature and therefore limited relevance to the

Proposed Development. However, there have been some major applications during the site's recent past which are of importance to the consideration of the current plans. These are set out in Table 2.1 below.

Table 2.1 Planning History: Major Applications

LPA Ref.	Description of Development	Date of Submission	Date of Decision	Decision
TP/05/1168	Outline Planning Application (siting and means of access) for the development of the existing University Campus at Trent Park involving the construction of up to 24,700 sq. m. of non-residential institution floor space (Use Class D1), up to 10,000 sq. m. of student residential accommodation (providing accommodation for up to 382 students), 250 car parking spaces, improved access and bus turn around facilities at the southern end of Snakes Lane involving the removal of the Lodge building, pedestrian crossing facility (Bramley Road), ancillary services, facilities, associated roads, paths and other infrastructure, together with associated landscape improvements.	09.09.2005	16.02.2006	Application taken to Planning Committee with Officer recommendation to approve but application refused by Members due to: <i>"The proposed development by virtue of its size, siting and scale would have inappropriate regard to the character and surroundings of Trent Park resulting in a form of development that would be inappropriately located in the Green Belt detrimental to its character and appearance..."</i>
TP/05/1058	Detailed application (First Phase) for a new Learning Resource Centre with academic accommodation including a 200 seat lecture theatre and associated facilities, new 3-storey student residential building for 100 students with ancillary space, cycle and disabled facilities and associated plant and servicing, including new substation / chillers and refuse compound area, as well as new landscaping and surfacing works around both buildings.	09.09.2005	16.02.2006	Refused as above
CAC/05/0003	Conservation Area consent to demolish three buildings (Gubby, Bevan and a greenhouse) at Trent Park campus	09.09.2005	16.02.2006	Refused due to the following: <i>"In the absence of acceptable proposals for the site following demolition, the proposed demolition of three buildings (Gubby, Bevan and a greenhouse) would</i>

LPA Ref.	Description of Development	Date of Submission	Date of Decision	Decision
				be contrary to UDP policy (I) C1 and Planning Policy Guidance Note 15".
LBC/05/0003	Resurface car park and upgrade exit pavements, as well as various internal works to include, new passenger and stairlift, upgrade stair hand rails and nosings, swing doors to entrance, vision panels, lighting, fire alarms, disabled toilet and various other works set out in the schedule of works to the (basement, ground floor, first floor & second floor) of the Mansion House, Middlesex University.	22.02.2005	03.07.2006	LBC granted
TP/03/1970	Outline Planning Application (Siting only) for the expansion of the existing University Campus, involving the construction of up to 44,000 sq. m. of non-residential institution (Use Class D1) floorspace; up to 25,000 sq.m. of student residential accommodation, 350 car parking spaces, ancillary services and facilities, and associated roads, paths and other infrastructure, together with associated landscape improvements.	15.10.2003	18.05.2005	Withdrawn
CAC/04/0012	Demolition of four buildings (Gubbay, Bevan, greenhouses and workshop).	18.05.2004	18.05.2005	Withdrawn
TP/04/1039	Detailed application (First Phase) for a new Learning Resource Centre (LRC) with 200 seat lecture theatre, two new 3-storey student residences providing a total of 199 student beds with ancillary space, reception lodge, cycle and parking provision facilities, new substation/chillers and refuse compound area, together with associated new landscaping works, new surfacing works (paths and access).	09.06.2004	18.05.2005	Withdrawn

3.0 **Consultation and Design Evolution**

- 3.1 In accordance with the National Planning Policy Framework (paras 188-195) the Proposed Development has been subject to early engagement and comprehensive discussions with the Council, statutory consultees, key stakeholders and the local community prior to the submission of this application. This consultation has also influenced the emerging design proposals and informed the scheme now submitted to the Council for its determination. This is set out in full in the accompanying Statement of Community Involvement (SCI) and Design & Access Statement (DAS); however, for ease, a summary is provided below.

LBE Pre-Application Advice

- 3.2 A significant number of pre-application meetings have been held with Enfield's Planning Team, the Conservation Team, the Tree Officer, the Urban Design Officer, Planning Policy, Highways, SUDs and drainage, energy/sustainability and the Parks Department. The scheme has also been presented to the Conservation Advisory Group on two occasions and the Design Review Panel (via Urban Design London).
- 3.3 Meetings have taken place with LBE since Berkeley first acquired the site in September 2015. Formal pre-application planning meetings have taken place regularly (approximately once a fortnight) since early February 2016 and this process has been subject to a Planning Performance Agreement (PPA).
- 3.4 Some of the key points which have resulted from this pre-application process (this list is not exhaustive) include:
- 1 Agreement to the delivery of public access to the Mansion House for the local community.
 - 2 Review of various alternative uses at the site (including educational, D1 community uses and business use) and agreement to the propose approach (full Alternative Uses Report included at Appendix 1). This included confirmation from LBE that the site is not required to meet the Council's educational needs.
 - 3 Review of the historic landscape proposals and agreement in relation to how this will link into the wider Trent Country Park, including the proposed bridge to the north-east.
 - 4 A detailed review of the existing trees on site and agreement to the proposed tree removal and planting strategy.
 - 5 Revisions to the layout of the north-eastern section of the site to ensure an appropriate relationship between the dwellings, the proposed estate road, the existing woodland/mature trees and the wider park.

- 6 Review of key views as part of the emerging landscape and visual impact assessment work and revisions to building heights to ensure these sit within the landscape.
- 7 The separation of the West Wing from the Mansion House (rather than an extension) and the service-wing character of this building.
- 8 Agreement that Vacant Building Credit applies at this site and can be applied to the affordable housing calculations (noting that CIL will apply on this basis).
- 9 Revisions to the Glade to provide small scale eco-homes suited to their woodland setting.
- 10 Revisions to the Daffodil Lawn apartments to turn their short-elevations onto the lawn to minimise their visual impact and ensure these buildings are subservient to the Mansion House.
- 11 Revisions to the Walled Garden design to bring the wall into the public realm and keep private entrances fronting onto this realm, with private and semi-private spaces behind. Revisions to the character of the proposed dwellings in this part of the site.
- 12 Revisions to the Southern Lane apartment blocks to reduce their height and mass and contain car parking to the rear to reduce its visual impact.
- 13 Provision of underground/undercroft car parking areas where appropriate to reduce visual impact and impact on the openness of the Green Belt.
- 14 Revisions to the internal layout of the Mansion House.
- 15 Review of the proposed SUDs scheme and drainage proposals.
- 16 Review of the access arrangements and agreement to the proposals for the Snakes Lane turning circle and shuttle bus arrangements.
- 17 Agreement to various improvements to the Snakes Lane/Bramley Road junction.

3.5 This has been a constructive and extensive pre-application process which, as set out above, has informed the Proposed Development. The masterplan and the detailed design of certain aspects of the site have evolved considerably and, wherever possible, the comments of LBE have been addressed.

Alternative Uses Report

3.6 As part of the pre-application process, LBE requested that Berkeley prepares an assessment with the purpose of exploring alternative uses to residential at the site to understand whether they would involve less physical intervention to the Mansion House (particularly the main ground floor historic rooms) and provide enhanced public access opportunities to the principal rooms within the Mansion. This was to provide a better understanding of whether the proposed residential conversion of the Mansion House would be the most appropriate and suitable option. LBE also requested that the primary assessment covered uses which could occupy the Mansion House only, or the Mansion House and additional buildings/space on the site necessary for their operations, with a

secondary analysis of a range of potentially compatible uses within the Mansion House.

3.7 Nathaniel Lichfield & Partners, with specialist input from ADAM Architecture, Giles Quarme & Associates, WSP and Jones Lang LaSalle, therefore prepared a comprehensive Alternative Uses Report (AUR) which is included at Appendix 1 to this Planning Statement. It sets out details of the site's marketing history, the constraints of the listed building, planning policy considerations, commercial and viability considerations and transport impacts. The following uses were assessed, agreed on the basis of the Council's Planning Statement for Trent Park:

- 1 The proposed residential-led development (Use Class C3)
- 2 Office / headquarters / research and development (Use Class B1)
- 3 Hotel (Use Class C1)
- 4 Retirement home / older care accommodation (Use Class C2)
- 5 Primary and/or Secondary and/or special educational needs school (Use Class D1)
- 6 Museum (or similar community type use) (Use Class D1)
- 7 Place of worship / religious institution (Use Class D1)
- 8 High-end sport / leisure (Use Class D2)

3.8 Each use was assessed against the following key considerations:

- 1 Design and operational considerations;
- 2 Planning policy; and
- 3 Commercial market and viability.

3.9 In addition, each section of the AUR includes a secondary qualitative assessment which considers where a mix of the above uses (including residential) within the Mansion House might be compatible and the benefits and issues associated with each.

3.10 A draft AUR was submitted to LBE for review and the final version of the AUR has been updated to address a number of officer comments.

3.11 This detailed assessment therefore provides the basis for the residential-led development now proposed at the site, given its findings were that residential (Use Class C3) and retirement home/older care accommodation (Use Class C2) receive the highest score and are considered the most suitable uses. It should be read alongside this Planning Statement as it forms an important part of the justification for the Proposed Development.

GLA Pre-Application Advice

3.12 Two pre-application meetings have been held with the GLA and TfL, the first on 14 April 2016 and the second on 20 July 2016. A site visit also took place

on 10 May 2016. The GLA issued pre-application advice on the schemes presented and a summary of their main comments is provided below:

- 1 Support for the principle of the residential redevelopment of the Major Developed Site, with strong support for the proposed heritage-led approach
- 2 Strong support for the proposed housing delivery, including family housing
- 3 Requirement for an affordable housing offer based on a viability assessment
- 4 Requirement for confirmation from LBE that the site is surplus to their educational land requirements (confirmed by LBE at meeting)
- 5 Need to ensure the proposals result in no greater impact on the Green Belt's openness than the existing (noting initial visual impact work demonstrated the proposed approach is acceptable)
- 6 Support for the masterplan and revised design approach (following April meeting). Requirement for front doors to the walled garden units to be on the outside edge of the units
- 7 No objection to the loss of the Bothy given its current condition and the wider benefits of the scheme
- 8 Requirement for further detail in the application on accessible routes, with shared surfaces providing appropriate pedestrian safe zones and pavement widths
- 9 Advice in relation to the energy strategy (which has been addressed as part of the submission)
- 10 Support for the proposed levels of car parking and the shuttle bus facility
- 11 Support for the provision of disabled parking only for the museum/cafe, with a request for further information on the need for any coach parking
- 12 Need for short-stay commercial cycle parking to exceed London Plan standards.

Historic England

- 3.13 The Proposed Development has been subject to comprehensive pre-application discussions with Historic England (via their Enhanced Advisory Service) both in relation to the built heritage on site and the historic landscape, which forms part of the Grade II Registered Park.
- 3.14 Historic England's comments have shaped the masterplan and detailed elements of the site as the scheme has evolved. A summary of Historic England's feedback on the scheme is set out below (noting that some of these reflect discussions with LBE set out above):
- 1 Support for the viable re-use of the Mansion House, the introduction of public access and restoration of the terrace

- 2 Requirement for the West Wing to be separate to the Mansion House, rather than an extension (as existing)
- 3 Guidance on the amended West Wing design, with a character more akin to a service wing arrangement
- 4 Requirement for an amended approach to the Glade area to deliver more sustainable architecture which would complement the woodland setting
- 5 General acceptance of the walled garden and orangery designs (outside of Historic England's remit)
- 6 Support for the restoration of the historic landscape including key features such as Wisteria Walk, the American Garden and Arboretum, the Daffodil Lawn and Lime Tree Avenue.

3.15 It is also important to note that Berkeley is continuing to work with Historic England and the Council to remove the Registered Park from the 'At Risk' Register and this has formed part of the pre-application discussions. The strategy has been agreed and incorporated (as far as the site is concerned) into these proposals.

The Trent Park Working Group

3.16 A Working Group was established by Enfield Council prior to the sale of the site, made up of cross party local Councillors including the Ward Councillors. Berkeley has met with the Working Group on six occasions between October 2015 and August 2016 and Members have been kept up to date on the proposals with the opportunity to provide comment and input to the proposed scheme.

The Trent Park Community Council

3.17 The Community Council was set up by Berkeley and includes representatives of 18 key local interest groups and stakeholders with a specific interest in the progress of the proposed development at the site. There have been six meetings to date, between November 2015 and August 2016, where updates have been given by Berkeley's team and feedback from the Group has informed the proposals now submitted to LBE.

The Local Community

3.18 Four public consultation events have taken place, each of which have run over three days (Friday to Sunday):

- 1 4th – 6th December 2015
- 2 26th – 28th February 2016
- 3 13th – 15th May 2016
- 4 8th – 10th July 2016.

- 3.19 These public exhibitions were advertised in the local newspapers and Berkeley also prepared newsletters which were delivered to 8,000-10,000 local residents, with 500 to key local stakeholders. Over 1,500 people have attended across the four exhibition dates and their feedback has been a key and valuable part of the consultation process.
- 3.20 Significantly, 92% of the public supported the proposals shown in July 2016 for public access to parts of the Mansion House, 95% supported the removal of the modern university buildings with 88% supporting a residential-led scheme, and 82% supported the proposals overall (14% were 'neutral'). Over the course of four exhibitions, with a significant number of attendees, the feedback has been extremely positive and the local community has been strongly in support of the proposed development and Berkeley's approach to the scheme, including the consultation process. At the July 2016 event, over 90% of attendees said they felt that Berkeley had engaged effectively with the local community.
- 3.21 Full details of the consultation undertaken are provided in the Statement of Community Involvement, but it is clear from the above that consultation, and the incorporation of a variety of feedback, has been at the core of Berkeley's approach to this development.

EIA Scoping

- 3.22 An Environmental Impact Assessment (EIA) has been undertaken in accordance with Town and Country Planning (Environmental Impact Assessment) Regulations 2011 (as amended) so that the environmental effects of the Proposed Development can be clearly understood. An EIA scoping request was made to the Council on 16 May 2016 and statutory consultees were consulted as part of this process (both pre and post submission to LBE). The Council's Scoping Opinion was issued on 9 August 2016 and incorporated the comments of various consultees. This is set out in further detail in the Environmental Statement (ES).
- 3.23 The findings of the ES respond to the comments of statutory consultees and LBE and provide a detailed assessment of a wide range of potential effects in respect of socio-economics, transport, noise and vibration, air quality, ground conditions, water resources, drainage and flood risk, archaeology (buried heritage) and ecology. The ES includes a standalone volume which comprises a Landscape, Visual Impact, Built Heritage and Historic Landscape Assessment, given the significance and scale of this assessment.

4.0

Summary of the Proposals

4.1

The proposals are set out in detail in the Design and Access Statement, the Landscape Design Statement, the Heritage Statement and on the planning drawings. The application seeks full planning permission for:

- 1 The demolition of Bevan Hall, Lakeview, Wisteria Building, Jebb Building, the Student Union, Gubbay Hall, the Sports Hall, Sassoon Hall, the Bothy, South Lodge and ancillary structures (a total of 24,125sqm of floorspace).
- 2 The restoration of the site's listed heritage assets and their change of use as follows:
 - The Mansion House to a mix of 980sqm of D1 use (museum/event space/ancillary café) in part of the ground floor and basement and residential C3 use in the remainder (15 dwellings)
 - The Orangery (plus a new extension) to 344sqm of D2 leisure use (gym), with full restoration of the swimming pool
- 3 The restoration of The Stable Block, the Dower House, the Gardeners Cottage and Rookery Lodge and conversion to C3 residential use (15 dwellings)
- 4 Construction of 232 new dwellings (C3 residential use) in the form of houses and apartments, ranging from 1 to 4 storeys in height
- 5 A total delivery of 262 residential units (35,663sqm GIA) with the following housing mix:

Unit Size	No. of Apartments	No. of Houses	TOTAL
1 Bedroom	35	1	36
2 Bedroom	64	4	68
3 Bedroom	35	32	67
4 Bedroom	0	72	72
5 Bedroom	0	19	19
TOTAL	134	128	262

- 6 Comprehensive historic landscape restoration scheme including:
 - Lakes and Cascade: clearance around the lake to enhance its role in views from the Mansion
 - North Lawn, American Garden and Arboretum: Retention of specimen trees and reincorporation of others into pleasure grounds. Reinstatement of late 19th Century grass terrace.
 - Ice House Wood and the Water Garden: reinstatement of pleached lime avenue.
 - Wisteria Walk and the Long Garden: reinstatement of lily ponds and the surrounding hedges.
 - The Orangery and the Pool Garden: removal of shrubs and reduction of overgrown hedges to recreate historic proportions

- Daffodil Lawn: reinstatement of historic horticulture
 - Walled Garden: repair of the walls, refurbishment of the central pool and axial paths
 - Statues, urns and gates: revealing, cleaning and repair (as necessary) of currently boxed-in statues, urns and gates
 - Implementation and management: Adoption of a landscape management strategy to ensure the long-term upkeep of the Registered landscape
- 7 Site-wide exemplar sustainable drainage system incorporated into the historic landscape
- 8 12.24ha of publically accessible amenity space with various new vehicular, cycle and pedestrian routes including a new bridge link into Trent Country Park
- 9 0.74ha of landscaped communal amenity space for residents of the apartment blocks
- 10 1,490sqm of on-site children's playspace, incorporated into the landscape scheme
- 11 Restoration of the site's outdoor tennis courts
- 12 Car parking associated with the development as follows:
- On curtilage: 240 spaces (97 of which are in garages)
 - Surface level: 71 spaces
 - Undercroft/basement: 111 spaces
 - Disabled parking: 27 spaces
 - Car Club: 2 spaces
 - Visitor parking: 37 spaces
 - Coach parking: 1 space
 - Courtesy minibus parking: 2 spaces
- 13 The delivery of a courtesy shuttle bus running along Snakes Lane with associated alterations to Snakes Lane at the junction with Bramley Road to include a turning circle with bus shelter, garage with driver facilities and cycle parking, along with new pedestrian crossings
- 14 Works to formalise Southgate Hockey Club's informal parking area within the Application Site to provide 103 formal car parking spaces
- 15 487 cycle parking spaces for residents and 38 visitor spaces

4.2

Listed Building Consent is required for various works to the Mansion House, its wing and terrace/forecourt, the swimming pool and Orangery and Wisteria Walk. There is a significant level of detail involved in these proposals, comprehensively set out in the accompanying Giles Quarme & Associates Built Heritage Assessment (Volume II of the Environmental Statement), the Design & Access Statement and the historic buildings application drawings. Reference should be made to these documents for full details of internal and external

works. In summary, the following is proposed to the Mansion House and Orangery:

Works to be undertaken to the Mansion House:

- Ground floor restored historic finishes
- Creation of a community/hireable/museum space with ancillary café
- Creation of residential flats at first floor
- Creation of duplex flats at second and attic floor level with the addition of dormer windows at attic level
- Creation of Service court west wing
- Creation of underground car park and refuse store
- Insertion of cast iron grilles to cover flue extracts at first floor and basement level
- Insertion of flue extract at roof level for second floor duplex flats
- Replacement of roof covering with lead to LSA specification standards

Works to be undertaken to the Orangery:

- Ground floor restored historic finishes
- Creation of a gym
- Creation of new glass extension with green roof and off-set living trellis wall
- Insertion of flue extract at roof level
- Replacement of roof covering with lead to LSA specification standards.

4.3 Various works are required to restore the Grade II listed statues and sculptures on site. These will be subject to further detailed survey work to establish the precise extent of works required to ensure the future of these listed assets and separate applications for listed building consent will be submitted as necessary.

4.4 In addition, various landscape restoration works are proposed to the Registered Park and these are detailed on the Landscape Masterplan and the Landscape Design Statement, prepared by Murdoch Wickham.

5.0 **Policy Context**

- 5.1 When determining applications for planning permission, Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires local planning authorities to begin by having regard to the 'development plan'. If the Authority concludes that the development plan contains provisions that are of relevance, it must determine the application in accordance with the development plan unless material considerations indicate otherwise. The Development Plan in place relevant to this application is outlined below. The National Planning Policy Framework (NPPF) and planning guidance documents are material considerations.

The Statutory Development Plan

- 5.2 The statutory development plan relevant to the site comprises the London Plan (2016, as consolidated with alterations), the LBE Core Strategy (2010) and Development Management Document (2014) along with the Proposals Map (2014). LBE has also adopted a number of Supplementary Planning Documents of relevance to the scheme, as set out at para. 5.6.
- 5.3 A detailed matrix of the key statutory development plan policies in the London Plan, LBE Core Strategy and DMD and associated guidance documents are set out at Appendix 2 and are not repeated here.

Site Designations

- 5.4 The site is subject to the following designations:
- 1 Green Belt
 - 2 Major Developed Site in the Green Belt
 - 3 Trent Park Conservation Area
 - 4 Area of Special Character
 - 5 Area of Special Advertisement Control
 - 6 Site of Metropolitan Importance for Nature Conservation (directly to the north and west of the site)
 - 7 Site of Borough Importance for Nature Conservation (to the south of the site)
 - 8 Local Open Space surrounds the south, west and northern edges of the site.

Other Policy Considerations

- 5.5 The following Mayor of London Supplementary Planning Guidance documents are relevant to the consideration of this application:
- 1 Sustainable Design and Construction (2014)

- 2 Housing (2016)
- 3 Crossrail Funding SPG (2016)
- 4 Social Infrastructure SPG (2015)
- 5 The Control of Dust and Emissions During Construction and
- 6 Demolition (2014)
- 7 Accessible London SPG (2014)
- 8 Character and Context (2014)
- 9 Play and Informal Recreation (2012)
- 10 CIL Charging Schedule

5.6 LBE has also produced a number of supplementary documents to guide development including:

- 1 The Trent Park Planning Statement (2012)
- 2 Trent Park Conservation Area Character Appraisal and Management Proposals (2015)
- 3 S106 SPD (2011)
- 4 CIL Charging Schedule (2016)

5.7 LBE has also recently consulted on a Revised Draft S106 SPD (2016); this had not been adopted at the time of submission.

5.8 The Application Site is shown on the Environment Agency's Flood Zone Maps as being within Flood Zone 1. This means that the annual risk of flooding is very low i.e. less than a 1 in 1,000 annual probability of flooding in any year (which is less than a 0.1% probability). The only exception to this is the watercourse which crosses Snakes Lane approximately mid-way along its length, where a small part of the site falls within Flood Zone 3. No development is proposed here.

National Planning Policy Framework

5.9 The National Planning Policy Framework (NPPF) was published in March 2012 and sets out the government's overarching approach to planning. It requires that the NPPF "*must be taken into account in the preparation of local and neighbourhood plans and is a material consideration in planning decisions*" (Para 2). It goes on to state that "*Proposed development that accords with an up-to-date local plan should be approved, and proposed development that conflicts should be refused unless other material considerations indicate otherwise*" (Para 12).

5.10 One of the key core planning principles of the document is to "*proactively drive and support sustainable economic development to deliver the homes, businesses and industrial units, infrastructure and thriving places that the country needs*" (Para 17).

- 5.11 Housing applications should be considered in the context of the presumption in favour of sustainable development. Paragraph 50 seeks to deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities through the plan making process.
- 5.12 In relation to design the NPPF states:
“The Government attaches great importance to the design of the built environment...good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people”(Para 56).
“It is important to plan positively for the achievement of high quality and inclusive design for all development, including individual buildings, public and private spaces and wider area of development schemes.” (Para 57).
- 5.13 In relation to Green Belt, the NPPF refers to Previously Developed Land (rather than defining Major Developed Sites) and states under para. 89 that the following will be permitted:
“limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development”.
- 5.14 In relation to heritage, Paragraph 126 outlines that the conservation of heritage assets can bring wider social, cultural, economic and environmental benefits. In accordance with paragraph 128 applicants are required to describe the significance of heritage assets affected by proposals, including any contribution made by their setting.
- 5.15 Paragraph 132 confirms that *“great weight”* should be attached to conservation and *“the more important the asset, the greater the weight should be”*. Any loss or significant harm requires *“clear and convincing”* justification. For designated heritage assets, consideration should be given to whether development would result in substantial or less than substantial harm to their significance.
- 5.16 The effect of a proposal on the significance of a non-designated heritage asset is required to be taken into account by paragraph 135. A balanced judgement is required having regard to the scale of any harm or loss and the significance of the heritage asset.
- 5.17 Paragraph 137 of the NPPF encourages local planning authorities to look for opportunities for new development within conservation areas and within the setting of heritage assets to enhance or better reveal their significance.
- National Planning Practice Guidance (NPPG)**
- 5.18 The NPPG was published in March 2014 and sets out guidance for new development, together with the national policies set out above. In particular it

provides more detailed guidance in relation to heritage and the natural environment.

Key Planning Considerations

- 5.19 We consider the following planning considerations represent the key policy issues against which the application should be determined:
- 1 The principle of development including the loss of educational use and impact on the Green Belt
 - 2 Heritage issues including built heritage and the historic landscape
 - 3 Housing delivery including affordable housing
 - 4 Community access and non-residential uses
 - 5 Design and amenity standards
 - 6 Transport and servicing
 - 7 Energy/sustainability
 - 8 Other environmental issues as assessed under the Environmental Statement.
- 5.20 Our assessment of the proposed development against these considerations is set out in Sections 6.0 to 13.0. Legal obligations/draft Heads of Terms are set out under Section 14.0.

6.0 **The Principle of Development**

6.1 There are three key issues associated with the principle of the proposed development:

- 1 The loss of educational use as part of the site's residential-led redevelopment;
- 2 The principle of developing within the Metropolitan Green Belt; and
- 3 What is appropriate development within the Metropolitan Green Belt.

Principle of Use

Loss of Educational Use

6.2 The lawful use of the Application Site is for D1 (non-residential institutional) purposes, having been occupied by Middlesex University until 2012. This comprises a mix of teaching space (Use Class D1) with ancillary student accommodation (Use Class C2). As set out in the London Plan Policy 3.18, proposals which result in the net loss of education facilities should be resisted, unless it can be demonstrated that there is no ongoing or future demand. This is reiterated in local policy DMD 17, which protects community facilities (including education), resisting their loss unless:

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

6.3 In response to part a) of DMD 17, Middlesex University relocated its facilities from Trent Park to their existing Campus at Hendon as part of a consolidation of its operations. A 'suitable replacement facility' has therefore already been provided to cater for Middlesex's student and staff population and there has been no loss of service. Indeed, this relocation allowed the University to enhance its educational offer; something which could not be achieved at Trent Park following the refusal of planning permission for its expansion at the site. On this basis, there is no requirement to protect this community facility as it has already relocated and will not be 'lost'. Part a) of policy DMD 17 is therefore appropriately addressed and there is no requirement to consider part b) of the policy.

6.4 Notwithstanding compliance with part a) of DMD 17, Berkeley has undertaken a detailed assessment in relation to part b). When considering evidence of pupil demand, the starting point for this is the Council's Development Plan, along with the Infrastructure Delivery Plan Review and Enfield's 2015 Cabinet Report and accompanying the Annual Report on Pupil Place Provision, Demand and Delivery Options. This has also been discussed at length with

Enfield Council during the pre-application process. Further to this, there is also the issue of market demand from education operators, both state and private.

Need for Pupil Places

- 6.5 In relation to primary school provision, the policy position (as set out in detail in the Alternative Uses Report at Appendix 1) is that there is no requirement to provide a facility at the Application Site. A review of the more recent evidence base (Cabinet Report 2015) demonstrates that demand can be met to 2019 but there will be a need to potentially provide one additional form of entry in the West of the Borough. However, funding has not been allocated and there is a requirement to assess local provision before this is progressed, including cross-borough (which may provide the capacity required) and it may be that planned additional capacity in the south-west can serve this need (for example, the Grovelands expansion).
- 6.6 Any future need for an additional primary form of entry is therefore currently unknown and there is no evidence to show this is required at the Application Site (or its immediate surrounding area).
- 6.7 In relation to SEN provision, the 2014/15 reports state that there is a requirement for additional pupil places in Special Schools to provide education services for some of the most acute special needs categories. However, we understand that plans are developing for an SEN school at Minchenden (at a former college site) and this would provide for the outstanding need in relation to a new facility. It is therefore not considered that there is a need for an additional facility at the Application Site (or its immediate surrounding area).
- 6.8 Finally, in relation to secondary school provision, there is no outstanding need to 2019. The 10 additional forms of entry required are being met by planned/delivered provision. Beyond 2019 there is a need for another 10 forms of entry by 2020 and another seven by 2023 and we note that there is reference in the evidence base to the need for opportunities to be identified in the west of the Borough by 2020. However, we also note that this need for the western area does not take into account any plans that could increase capacity of existing facilities and that this covers a significant part of the Borough (south-west as well as north-west and western central).
- 6.9 Further work is therefore required by LBE to identify where in the 'west of the Borough' this need should be focused, based on existing and emerging provision and the capacity provided by neighbouring Boroughs, before a site such as the Application Site can be identified beyond 2020.
- 6.10 Notwithstanding this, we note that given the current condition of the site and in particular the deterioration of its heritage assets, the programme for development is urgent and investment is required well in advance of 2020. It would be speculative to propose a large new secondary school at the site now, without any Council interest/investment and without any commitment from a private education provider given the lack of evidence of demand in the next 4-5 years. On this basis, whilst there is likely to be demand for additional

secondary school forms of entry beyond 2020 and 2023 in the west of the Borough, the proposals for the site need to be taken forward urgently and considerable investment needs to be made in its heritage assets over the next 12-24 months.

- 6.11 In this context it is important to confirm that LBE has set out in its Planning Statement for Trent Park (para. 3.14) that *“the Council has itself considered the site for its own education needs and whilst there is a need for primary and secondary places, it is not in this location; therefore there is no immediate local authority need for continuing educational use of the current nature”*. This has also been confirmed during pre-application discussions with LBE; the Council has confirmed this position to the GLA. Any demand would therefore need to come from the private sector, as addressed below.

Market Demand

- 6.12 In relation to market demand from state and private educational operators, this is considered in further detail below.
- 6.13 From the state sector, LBE has considered the application site for its own educational needs and confirmed that whilst there is a need for primary and secondary places, it is not in this location (see LBE’s Planning Statement for Trent Park para. 3.14, as referenced above). There is therefore no immediate local authority need for continuing educational use on the site.
- 6.14 On this basis, any school on the site would therefore need to be private in nature and it is important to consider the marketing of the site to understand whether there is any demand from these operators. When the site was initially marketed in 2012 there was interest from education providers; however, only two submitted bids which were conditional on funding from The Department of Education and four submitted a financial bid. The education providers which submitted a bid ranged in type. Most were relatively new to the market and had international connections. They included a Malaysian higher education medical college, an American primary / secondary college, a higher education business school, a primary school academy and a number of free schools.
- 6.15 The site was put under offer on two occasions to international education providers, but both sales fell through due to incomplete business cases and the lack of investment support at board level. Both agreed sales were in excess of £35 million. These sales were essentially unconditional, save for being subject to external finance.
- 6.16 In 2012 the site was ultimately bought by Allianze University College of Medical Sciences (AUCMS) for £31.5 million. Unfortunately, however, the scheme did not succeed and AUCMS subsequently went into administration.
- 6.17 The Application Site was therefore put back on the market in 2015 and, in contrast to the 2012 marketing process, there was no standalone educational interest for the site. Only one bidder considered bringing in a school as part of their bid, but it was ultimately considered unviable. There was therefore no

market demand in 2015 from private educational operators and the costs involved in the restoration of the site's heritage assets and the overall viability for educational use were considered to be key factors.

6.18 On the basis of the above, it is clear that:

- 1 The University relocated in 2012 as part of its consolidation and enhancement of its educational offer, and therefore a suitable replacement facility has already been delivered and there is no requirement to propose one as part of this proposal; and
- 2 There is no demand for an educational use at the Application Site, both in relation to the need for pupil places and market demand from both state and private operators.

6.19 The loss of educational use at the Application Site is therefore acceptable and accords with the requirements of London Plan Policy 3.18 and local policies DMD 17 and Core Policy 8.

Green Belt

6.20 The Application Site is designated as a Major Developed Site (MDS) in the Green Belt. As set out under para. 89 of the NPPF, limited infilling or partial or complete redevelopment of previously developed sites (such as the Trent Park MDS), whether redundant or in continuing use, is considered acceptable subject to there being no greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development.

6.21 In relation to local planning policy, Core Policy 33 (dating from 2010) states that when existing uses become redundant at Middlesex University's Trent Park Campus, "*the Council will work with partners to prepare planning briefs or masterplans in order to guide appropriate future development that preserves and enhances the character of the green belt*". Further to this, DMD 89 states that redevelopment at the Trent Park MDS will be permitted where the proposal improves the character and appearance of the site and appearance from the surrounding Green Belt, as well as having no greater impact on its openness.

6.22 In 2012, the Council prepared 'Enfield's Planning Statement for Trent Park Campus' and this was adopted as supplementary planning guidance. The Statement was prepared as the University's timeframe for disposal did not provide the opportunity for a planning brief to be prepared, yet a document was required to inform prospective purchasers of the planning constraints to be respected in the course of developing new proposals. It noted at para. 1.3 that the Council would expect any future owner to accord with Core Policy 33 and bring forward a comprehensive masterplan for the campus in advance of any planning application. The Planning Statement also states at para. 3.11 that:

“Previous planning applications have shown that it would be possible for development to be moved around the site but this would have to be subject to its impact on the environmental and visual appearance of the site, connectivity with the rest of the borough and physical relationships with the rest of the Parkland and wider Green Belt”.

- 6.23 From the above policy context, it can be concluded that the redevelopment of the application site, an MDS in the Green Belt, is considered acceptable subject to:
- 1 There being no greater impact on openness than the existing;
 - 2 The proposal improving the character and appearance of the site; and
 - 3 A comprehensive masterplan being prepared in consultation with the Council.
- 6.24 In relation to the latter, and as set out under Section 3.0 of this report, the scheme proposes a site-wide approach to the MDS and a detailed masterplan has been prepared with significant input from Enfield Council along with Historic England, the GLA, statutory consultees, local groups and the local community. It secures a comprehensive approach to the site which will ensure the necessary tests can be met in relation to impacts on openness, design quality, layout, landscaping and materials. The approach required under Core Policy 33, and advocated in the Trent Park Planning Statement, has therefore been adopted and the application is subject to a detailed masterplan.
- 6.25 In relation to impact on openness, current policy set out in the NPPF and the Development Plan does not specify how this should be assessed. To put this into the relevant context, we consider it is necessary to review Planning Policy Guidance 2 (PPG2 ‘Green Belts’, 1995) Annex C which, whilst now replaced by the NPPF, provides the basis for highlighting the original intended purpose of MDS. Annex C set out that MDS were, in the case of redevelopment, supported for their ability to deliver environmental improvements without adding to the impact on the openness of the Green Belt and the purpose of including land within it. The guidance explains that when considering proposed additions to the existing developed portions of sites, developments should not occupy a larger area of the site than the existing building(s) footprint unless this would achieve a reduction in height which would benefit visual amenity; when considering infilling, there should not be a ‘major increase in the developed portion of the site’. The character and dispersal of proposed buildings and their relationship to the surrounding landscape was also noted as a relevant consideration. Further, it advised that redevelopment proposals should be considered in the context of the entire MDS.
- 6.26 Although not specified in the NPPF, the assumption is that a similar basis to that set out under PPG2 should be applied, and the test of impact on openness is one which requires both qualitative and quantitative assessment.
- 6.27 The quantitative assessment must be based primarily on footprint of the built form. The current site has a built footprint of circa 15,670sqm. The Proposed

Development comprises a total built footprint of circa 18,500sqm (including all ancillary bin/cycle stores, sub-station etc.).

6.28 There is therefore an uplift in built footprint of approximately 18%. However, as a developed proportion of the Application Site, the built footprint has increased by only 1% from 7% to 8%.

6.29 On the basis of this quantitative assessment, it is therefore concluded that the Proposed Development will not occupy a significantly larger area of the site than the existing and there is no 'major increase in the developed portion of the site'. However, visual amenity and the dispersal of the buildings on site are key to the assessment of the comparatively small uplift in built footprint. This needs to be assessed qualitatively to understand the impact on visual amenity and views, and therefore whether this would have a greater impact on the openness of the Green Belt than the existing development.

6.30 The PPG2 guidance refers to a reduction in height, benefitting visual amenity, but also the importance of the character and dispersal of buildings and their relationship to the surrounding landscape; this also has the potential to benefit visual amenity and thereby the Green Belt's openness.

6.31 The existing buildings range in height from one to four and a half storeys. Other than the heritage assets which are to be retained, the tallest building is Gubbay Hall at 4.5 storeys with a footprint of 1,320sqm. The Jebb Block, an extension to the Mansion House, reaches three storeys and has a considerable built footprint of 2,120sqm. The Bevan Block, also at 2-3 storeys, has a substantial footprint of over 2,000sqm. This is characteristic of all existing buildings on the site; even where their height is relatively low, they have substantial built footprints and occupy large areas of the site.

6.32 In comparison, the largest proposed apartment block has a footprint of 800sqm and is three storeys in height with a set-back fourth storey. This sits on the location of the existing Gubbay Hall, with a reduced height and substantially reduced footprint. The remaining new buildings range from one to three storeys, comprising individual houses or small-scale apartment blocks with footprints of 65sqm-345sqm. Therefore, whilst there is a reduction in height in some parts of the site, even where the height remains similar to the existing, the built footprint of individual buildings is substantially reduced, breaking up the built mass and creating an increased sense of openness and views through the site.

6.33 It is also important to note that the built footprint has been sensitively relocated to sit to the south and east of the Mansion House, with no development on the site of the existing 2,000sqm Bevan Block to the north of the Mansion House. There is therefore reduced site-wide dispersal of built footprint and the overall developed area is more contained. This layout has been informed by detailed assessment of the site's topography and surrounding landscape and has been subject to rigorous testing of various views with associated amendments to building positions and heights, informing the final landscaping scheme. The

detailed Landscape and Visual Impact Assessment (LVIA) forms part of Volume II of the Environmental Statement.

- 6.34 The LVIA concludes that there are a number of significant beneficial landscape and visual effects associated with the proposed development, principally associated with the removal of the existing university buildings which detract from the character and appearance of the site's heritage assets and the proposed restoration to enhance the landscape setting. The proposed residential development will introduce built form to limited areas of the site (principally the walled garden and the land to the west of the Dower House). However this development will not increase the visibility of built form across the site.
- 6.35 The LVIA demonstrates that visual effects from all viewpoints will be beneficial (minor or moderate) or neutral, with the exception of views contained to the southern lane, where the existing hedge will be removed and apartment blocks will be located adjacent to the road. As the proposed planting matures, these impacts will be effectively mitigated.
- 6.36 It is therefore concluded that the Proposed Development's qualitative impact on the openness of the Green Belt will be no greater than the existing and there will be significant visual amenity benefits which weigh strongly in favour of the Proposed Development.
- 6.37 On this basis it is considered that the development fully accords with the Green Belt policies set out in the NPPF, the London Plan and Enfield's local plan documents. As a developed proportion of the Application Site the built footprint has increased by only 1%, and through the relocation and breaking up of the built footprint, amendments to building heights, high quality materials and finishes and a comprehensive landscape restoration scheme, there are considerable visual benefits which enhance the character and appearance of the Application Site and its surroundings and protect the openness of the Green Belt. This addresses the feedback received from consultees including GLA officers; the proposals will result in no greater impact on the Green Belt's openness than the existing built form of development on the Application Site.
- 6.38 The Proposed Development will therefore secure the sustainable re-use of a vacant brownfield site which meets the Green Belt tests.

Principle of Residential Development within the Metropolitan Green Belt

- 6.39 Following the loss of the site's educational use, various other uses have been considered in detail as set out in the appended Alternative Uses Assessment. This is in the context of the Council's Planning Statement for Trent Park, which seeks various alternative uses for the site with a community or employment focus.
- 6.40 Whilst the findings of this assessment are not repeated here (and cross reference should be made to this report) there are numerous and complex

issues to be taken into account. In particular, it is important to consider the need to secure a comprehensive site-wide masterplan approach to this Major Developed Site in the Green Belt, as set out under Core Policy 33 and DMD policy 89 (see 'Green Belt' assessment below); the assessment consistently makes reference to the significant issue of site fragmentation and demarcation associated with the majority of the alternative uses.

- 6.41 The Alternative Uses Report concludes that the most successful approach to a comprehensive masterplan, which will offer benefits both now and for the future, is to secure one owner and operator who is responsible for a comprehensive approach to the site's maintenance and management, both in relation to its built heritage and the historic landscape. None of the alternative uses, with the exception of a 'over 55s' retirement home (which is very similar to C3 residential), would permit this approach to the same extent as the proposed residential use, with overarching ownership and ongoing management undertaken by Berkeley. Nor is it likely that any of the other options would generate sufficient value to enable implementation of a sustainable masterplan.
- 6.42 It is therefore concluded that the proposals should seek to provide residential (Use Class C3) or retirement home/village (Use Class C2), but ensure this includes some provision for community access to the Mansion House. This would also support the wider landscape restoration strategy, providing a comprehensive site-wide response which restores the site's history and opens it up to wider public understanding. On this basis, the proposed residential use is considered to be both appropriate and acceptable.
- 6.43 In relation to the proposed delivery of housing on site, this is addressed further under Section 7.0 of this report.

7.0 **Effects on Heritage Assets**

- 7.1 The application is accompanied by a detailed heritage assessment (Volume II of the Environmental Statement) which considers the potential for significant effects to arise from the proposed development in relation to above ground heritage assets. This is supported by a Historic Landscape Assessment, prepared by Actaland, and a Historic Building Assessment, prepared by Giles Quarme Associates. Detailed reference should be made to these documents.
- 7.2 In summary, the principal works to the listed buildings on site comprise the demolition of modern extensions to the Mansion House and the Orangery, their change of use to residential, community and leisure and the restoration of the Registered landscape and swimming pool.

Residential Use of the Mansion House

- 7.3 In relation to the principle of the change of use of the Mansion House, the National Planning Policy Guidance sets out under 'Conserving and Enhancing the Historic Environment' para. 15 that if there is only one viable use for a heritage asset, that use is the optimum viable use. However, "...if there are a range of alternative viable uses, the optimum use is the one likely to cause the least harm to the significance of the asset, not just through necessary initial changes, but also as a result of subsequent wear and tear and likely future changes". It is also noted that the optimum use may not be the most profitable one, and also that the optimal use may be the original use but that may no longer be economically viable or the most compatible with long-term conservation of the asset. The NPPG also states that *"...if from a conservation point of view there is no real difference between viable uses, then the choice of use is a decision for the owner"*.
- 7.4 It is in this context that the Alternative Uses Report at Appendix 1 has been prepared, considering a range of alternative uses to understand which of these are viable and therefore whether there is one or more optimum use which should be taken forward as part of the proposals for the site.
- 7.5 In summary, subject to the NPPG considerations of viability and long-term conservation, it is generally accepted that the most appropriate use for a historic building is that for which it was originally designed. This relates to the building's historic value and is set out under Historic England's 'Conservation Principles: Policies and Guidance for the Sustainable Management of the Historic Environment' (2008):
- "The use and appropriate management of a place for its original purpose, for example as a place of recreation or worship, or, like a watermill, as a machine, illustrates the relationship between design and function, and so may make a major contribution to its historical values. If so, cessation of that activity will diminish those values and, in the case of some specialised landscapes and buildings, may essentially destroy them" (para. 45).*

- 7.6 In the case of the Mansion House, it was designed, built and used over three centuries as a large residential dwelling; it was a private home up until World War II when the estate was requisitioned by the Government. The change of use of the building to educational in 1947, when it was taken over by Middlesex County Council as a teacher training facility (which then became Middlesex Polytechnic in 1974 and Middlesex University in 1992) has had a number of detrimental impacts on the Mansion House, with various inappropriate insertions and damage to important historic fabric which have diminished the value of the building's interiors. For example, the insertion of a large amount of computer wiring and structural strengthening of floor loads for educational/ancillary office use have included large steels, extra floors, lowering of ceilings and inappropriate additions and removal of historic fabric. The building was not designed for this use and it is not considered the most appropriate for this asset. The Mansion was designed and used as a dwelling for the majority of its life and much of its significance relates to its residential history. Converting the house back to its original use (Class C3) is therefore considered entirely appropriate.
- 7.7 The proposal to use of part of the Mansion House as a museum/event space/café is considered further under Section 9.0 of this report. It is considered acceptable in principle given it will provide the opportunity for public access to the house for the first time in its history, revealing its considerable historic significance. The extensive archival material available with regard to the architectural history of the house, and the history of its owners, both private and public, is a significant untapped resource which will become fully-accessible to the public; this will provide the opportunity for a wider understanding and appreciation of the site. This proposal also accords with Enfield's Trent Park Planning Statement and the desire to open up the site's heritage assets to the public under managed access.

Orangery

- 7.8 The Orangery and swimming pool form ancillary buildings/features to the residential nature of the Mansion House, providing heated bathing facilities for Sassoon and a greenhouse to house orange trees and potted plants. The restoration of the heated outdoor swimming pool for the use of residents for bathing is in keeping with this historic purpose, and the use of the Orangery as a leisure facility is also in keeping with this character. The proposed Orangery extension is designed to appear as a contemporary greenhouse, constructed of glass and steel with plants climbing its walls, a contrast to the historic materials but reflective of its original intended use.

Summary Assessment

- 7.9 The heritage assessment establishes that the operational development would have only beneficial effects on the assessed designated heritage assets and their settings. In relation to the Mansion House, the effect on its significance is 'substantial beneficial' and the effect on the Orangery and the various statues/sculptures on site is 'moderate beneficial'. The effect on both the Trent

Park Registered Park and the Trent Park Conservation Area is 'substantial beneficial'.

- 7.10 The effects on the positive contributors within the Trent Park Conservation Area (non-designated heritage assets) would vary from moderate to minor to moderate beneficial, except for a moderate adverse effect, before mitigation, on the Bothy. Mitigation measures are proposed to address this.
- 7.11 Under the statutory duties set out in Sections 66 (1) and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 the Council must give considerable weight to the desirability of preserving listed buildings and their settings, and the character and appearance of conservation areas (Barnwell Manor Wind Energy Ltd). They must refuse applications where harm is identified unless that harm is outweighed by power material considerations.
- 7.12 With regard to the statutory tests and local policy, the redevelopment of the Bothy would principally constitute very minor 'less than substantial harm' to the Trent Park Conservation Area as a heritage asset. However, weighed against the extensive range of enhancements being proposed to the Conservation Area as a whole, including restoration and reuse of the Mansion, the listed ancillary structures, historic landscape restoration, and the redevelopment of negative contributors with attractive and appropriately designed residential development, the net effect on the Conservation Area would be overwhelmingly positive.
- 7.13 On this basis the Council's statutory duty to preserve the character and appearance of the Trent Park Conservation Area would be met, and local policy requirement to give weight to the conservation of heritage assets in proportion to their significance.
- 7.14 This assessment confirms there would be no significant environmental effects on above ground designated heritage assets and that the significance of the affected designated heritage assets would be preserved. Non-designated heritage assets would be conserved in a manner appropriate to their significance, as required by the NPPF.
- 7.15 Taken together, the proposals are consistent with the objectives of Sections 66 (1) and 72 of the Planning (Listed Building and Conservation Areas) Act 1990 which requires special regard to be given to the conservation or enhancement of listed buildings, and Conservation Areas in the planning balance.
- 7.16 Furthermore, any perceived harm associated with the conversion and alteration of listed buildings in the Application Site is less than substantial and is outweighed by the considerable public benefits arising from the Proposed Development.

8.0 **Housing Delivery: Mix and Tenure**

8.1 As set out under the NPPF (para. 49) '*housing applications should be considered in the context of the presumption in favour of sustainable development*'. Plans should deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities.

8.2 The housing proposals at the site should be considered in this overarching national policy context, set by the government.

Housing Need

8.3 The London Plan sets a minimum ten year housing target for Enfield (2015-2025) of 7,976 dwellings (798 per annum). This is in the context of a London-wide demand for a minimum of 49,000 additional homes each year. The Core Strategy sets a much lower target, to exceed 395 dwellings per annum, but notes that this is soon to be superseded by the London Plan targets. This was anticipated to be 11,000 new homes from 2010/11 to 2024/25 and the Core Strategy seeks to meet this target.

8.4 Clearly the proposed delivery of 262 dwellings at the Application Site over a phased build period of 5-6 years will provide an important contribution to Enfield's housing targets and overall housing need in London. It will deliver the sustainable re-use of a vacant brownfield site, in accordance with policy and guidance at a national, regional and local level.

8.5 It is also noted that London Plan policy 3.4 requires developments to optimise housing output for different types of locations in accordance with the density matrix. The site is considered to be in a suburban location which, given the low PTAL rating, would support a development of 35-75 u/ha. Based on the total site area (i.e. including the complete restored landscape) the scheme would achieve a density of 12 u/ha. Based on the 'development area' only (i.e. excluding the publically accessible open space) the scheme would achieve a density of 32 u/ha.

8.6 Whilst this is clearly below the London Plan density guidance, this is a guide only. The key consideration with this site, which necessitates a bespoke approach beyond this density matrix, is that it is an MDS in the Green Belt. There is a need to balance maximising the site's potential to deliver housing against the impacts on the openness of the Green Belt. As set out under Section 6.0 of this assessment, the proposed development has been carefully planned and rigorously tested to ensure this is the case, and we therefore consider that the site's potential to deliver housing has been optimised. This accords with the approach set out under Core Policy 5.

Housing Mix

8.7 In relation to housing mix, Core Strategy (2010) policy 5 sets a market housing mix for the following:

- 20% 1 and 2 bed flats (1-3 persons)
- 15% 2 bed houses (4 person)
- 45% 3 bed houses (5-6 persons)
- 20% 4+ bed houses (6+ persons)

8.8 Policy DMD 3 refers to the targets set under the above Core Policy, and notes that developers are expected to take a design led approach to maximising the provision of family units (3 bed +) where the site context and conditions are appropriate.

8.9 The proposed housing mix at the site is set out in Table 7.1 below.

Table 8.1 Proposed Housing Mix

Unit Size	No. of Apartments	No. of Houses	% of Total
1 Bedroom	35	1	14%
2 Bedroom	64	4	26%
3 Bedroom	35	32	26%
4 Bedroom	0	72	27%
5 Bedroom	0	19	7%

8.10 The proposals therefore accord with Core Policy 5 and DMD 3, delivering a range of dwelling sizes from 1-5 bedrooms but with a high proportion of family units. This also reflects the findings of the Council's 2010 Strategic Housing Market Assessment (SHMA), on which the Core Strategy targets were based. 60% of the proposed units are suitable for families (158 3+ beds), 78% of which are houses and 22% of which are apartments. This is a significant benefit of the scheme and weighs strongly in its favour.

Wheelchair Accessible Housing

8.11 The London Plan Policy 3.5 and 3.8 set requirements for accessibility and adaptability for new dwellings to ensure housing choice. Specifically, part c of Policy 3.8 requires 90% of new housing meet Building Regulation requirement M4 (2) 'accessible and adaptable dwellings' and 10% to meet Building Regulation requirement M4 (3) 'wheelchair user dwellings'.

8.12 This is reflected under Core Policy 4 which requires 10% of all new homes to be suitable or easily adaptable for wheelchair users, with a range of unit sizes delivered. Policy DMD 8 part f) sets the same target.

8.13 The proposed new-build houses/apartments will fully comply with these policies, accommodating the requirements of disabled access under Part M (2) with 10% complying with the requirements of Part M (3). These units will comprise a mix of sizes, as set out in further detail in the Design & Access Statement and on the planning drawings.

- 8.14 In relation to the conversion of the Mansion House, Stable Block and existing cottages to residential units, provision has been made wherever possible to provide level threshold or lift access within the constraints of the existing building fabric. This is addressed further under the 'Access' chapter of the Design and Access Statement and on the planning drawings. This approach is considered acceptable in order to protect the character and appearance of these buildings and their significance.

Affordable Housing

- 8.15 The Government announced the introduction of the Vacant Building Credit (VBC) via a Ministerial Statement on 28 November 2014 and relevant guidance was added to the NPPG. The Ministerial Statement set out that:

“A financial credit, equivalent to the existing gross floorspace of any vacant buildings brought back into any lawful use or demolished for re-development, should be deducted from the calculation of any affordable housing contributions sought from relevant development schemes. This will not however apply to vacant buildings which have been abandoned”.

- 8.16 This was challenged by Reading BC and West Berkshire DC at the High Court. The Judgement (issued on 31 July 2015) found aspects of the Ministerial Statement to be unlawful. However, the case was then taken to the Court of Appeal by the SoS and the Judgement (Secretary of State for Communities and Local Government (SoS) v (1) West Berkshire District Council (2) Reading Borough Council) handed down on 19 May 2016 allowed the appeal and VBC has now been formally re-introduced and re-written into the NPPG at para. 21:

“Where a vacant building is brought back into any lawful use, or is demolished to be replaced by a new building, the developer should be offered a financial credit equivalent to the existing gross floorspace of relevant vacant buildings when the local planning authority calculates any affordable housing contribution which will be sought. Affordable housing contributions may be required for any increase in floorspace”.

- 8.17 In the case of the Application Site, all existing floorspace on site has been vacant since 2012, pending either re-use or redevelopment, but has not been abandoned. The delay in occupation has been as a result of the failed process of finding a suitable purchaser who was able to both afford the purchase price and additional funding required to bring the site back into beneficial use. The vacant buildings are either to be brought back into use or demolished and replaced with new floorspace. It is therefore considered that a 'credit' should be applied which is the equivalent of the existing gross floorspace on site. The Proposed Development is a clear case of the Government's intention to incentivise brownfield land development, introducing this VBC policy without any requirement for a viability assessment to be undertaken. This has been discussed with LBE as part of the pre-application process and LBE has agreed that VBC applies at the Application Site.

- 8.18 We note that initial pre-application advice from the GLA is that the Mayor will be providing guidance on VBC in his forthcoming Affordable Housing SPG but that, in this case, officers are minded to recommend that the Mayor does not attribute significant weight to the VBC policy. This is in the context of various considerations including the intention of the policy, pressure for affordable housing in London, the fact that some brownfield sites come forward without such an incentive and given the fact that the NPPF requires competitive returns to be delivered to a willing landowner and developer via the viability impact tests for affordable housing. It is accepted that the amount of weight to be adopted to VBC is a matter for the decision maker (LBE) but it should be borne in mind that:
- 1 It is clear that the above are considerations that existed at the point that the Secretary of State introduced (and subsequently re-introduced) VBC. The Secretary of State would clearly have had these considerations in mind and decided that it was appropriate and reasonable to introduce VBC regardless.
 - 2 The GLA has provided no reasoning for why the above considerations outweigh VBC on a site-specific basis.
 - 3 The draft Affordable Housing SPG has not yet been published – it will be a draft document and very little weight (if any) should be afforded to it until it has been published and there has been a proper opportunity for any consultation responses to be properly considered and assessed.
- 8.19 On this basis we consider VBC applies at the Application Site (as agreed with LBE) and therefore the policy-compliant affordable housing requirement should be calculated as a percentage of the net additional floorspace, to be delivered on site or, if considered more suitable, off site or by way of a financial contribution, or through a combination of these three options.
- 8.20 The existing floorspace on site totals 29,650sqm (GIA). The proposed residential floorspace totals 35,663sqm (GIA). There is therefore a net additional uplift of 6,013sqm.
- 8.21 To calculate the policy-compliant affordable housing offer on this basis, it is necessary to work this out as a percentage of the requirement should VBC not apply, i.e. 16.86% of the total 'non-VBC' affordable housing offer. 40% (as required under LBE Core Policy 3 and DMD 1) of 262 units would deliver 105 affordable dwellings. 16.86% of 105 units would therefore equate to a policy requirement for 18 affordable units, split 70:30 between social rented and intermediate provision.
- 8.22 On this basis, the proposals include the delivery of 18 affordable units on site, comprising 13 social rented units and 5 intermediate (shared ownership) units. These units are to be delivered in the southern lane apartment blocks, as identified on application drawing 5902/PL113. These will include a mix of unit sizes to meet local need as follows:

Social Rented:

- 1 1 bed: x5
- 2 2 bed: x5
- 3 3 bed:x3

Intermediate:

- 1 1 bed: x4
- 2 2 bed: x1

8.23

In summary, therefore, the scheme will deliver a policy-compliant affordable housing offer based on VBC, delivered on-site as a mix of social rented and intermediate tenures with a range of unit sizes available to residents of LBE. This meets the requirements of LBE Core Policy 3 and DMD 1, as well as the Ministerial Statement and associated NPPG guidance.

9.0 **Community Access and Non-Residential Uses**

9.1 Enfield's Planning Statement for Trent Park sets out that, along with the heritage restoration element of the site, there is a "*continued expectation to secure public access to the heritage assets for future enjoyment*" (para. 3.8). It is noted that although the university site was privately owned, it offered permissive public access throughout the campus grounds, albeit with overnight restrictions. The Statement sets out that:

"The Council would look positively at any future uses that would continue such arrangement, and would also wish to extend opportunities by way of negotiating managed access arrangements to some of the key assets such as the Orangery, Lido, Mansion and daffodil lawn, possibly through potential annual 'open house' events. Measures such as reinstating existing footpaths together with the creation of new footpaths and bridleways, links to other green networks and, where appropriate, urban fringe areas should also be explored to help promote the creation of wider green infrastructure, and ensure compliance with the Council's planning policies".

9.2 The issue of a proposed use and public access also relates to the need to address employment on-site and the inferred 'loss' given the change of use from educational to residential. We note that in relation to the latter, there is currently no employment on site and has not been since 2012. Whilst the site has a lawful educational use which clearly supported a number of jobs in the past, those jobs have relocated as part of the University's consolidation of its activities at its Hendon Campus, and the development will not result in the loss of any existing jobs. In relation to the site's suitability for other employment-generating uses, these are considered in detail in the Alternative Uses Report and are not considered preferable to residential for various reasons. There is therefore no conflict with policy DMD 22.

9.3 Notwithstanding this, Berkeley has considered other uses for the site which would be compatible with a residential use, providing public access whilst also delivering some employment on site. This is to be secured by way of a museum/event space/café in the Mansion House, a gym in the Orangery (linked to the restored swimming pool) and an ongoing historic landscape management scheme with new footpaths, cycleways and public realm (including children's play provision) which will be publically accessible. It is anticipated that these uses, once operational, will deliver a net gain of 16 full time jobs. These uses are addressed in turn below.

The Museum/Event Space/Café

9.4 In order to secure public access to the Mansion House for the first time in its history, Berkeley is proposing to deliver a community use within the parts of the ground and basement floors which are of the greatest significance to the site's

history. This space would operate as a museum with event space and an ancillary café (to include outdoor seating on the terrace).

- 9.5 Whilst there is a policy requirement set out in the London Plan and local policy to apply the town centre first sequential approach to a community use, given it would be specific to the history of the Mansion House and its landscape, it can be assumed that the sequential test does not apply; there is a location-specific requirement for this use to be on site.
- 9.6 In relation to accessibility and transport impacts, this creates a conflict with policy requirements (DMD 16) for the location of this proposed use i.e. the museum has to be at the site to provide an understanding of its history, but the site by its very nature is not suitable in policy terms for this type of facility due to its accessibility. On this basis, it has been determined that the facility should be of a scale which is focused on the local community and a more limited national audience, with disabled car parking only to restrict vehicle movements and car parking footprints on site. A single coach bay has also been proposed to accommodate small school parties who may wish to visit the museum for educational purposes. The Transport Assessment, prepared by WSP, demonstrates that this proposal is acceptable in relation to its traffic impacts.
- 9.7 In relation to a community use being accessible to all, it has been possible to provide level access to the proposed ground floor and basement areas of the house, but disabled access cannot be provided to the remainder of the House due to restrictions of the historic fabric and its significance. The proposals therefore seek to meet the requirements of DMD 16, providing the maximum amount of space with access for physically impaired users whilst protecting the significance of the listed building.
- 9.8 In addition, Policy DMD 16 refers to the community facility having a 'community need'. We note that along with the Council's priority for public access (as set out in their Planning Statement for Trent Park) the feedback from the local community has been overwhelmingly in support of the proposed community space (with associated access) within the Mansion House. At the most recent public exhibition, the proposed spaces (albeit at this stage the proposal was for a smaller area of the ground floor/basement to that now proposed) and intended operating characteristics were presented. The feedback received was very positive in relation to the access to the most significant rooms of the house, a need to ensure vehicle trips are minimised and the types of activities and opening hours proposed. We therefore consider that in this case the 'need' arises from a strong desire for its delivery and a high level of community support.
- 9.9 The viability of this use is clearly critical to its future sustainability. Berkeley will maintain an ongoing interest in the site (retaining ownership and management) with a stake in this community space, and has been working closely with specialist advisors to develop the museum proposal. Ongoing discussions are taking place and a Business Plan is being prepared in consultation with various parties. It will include information on anticipated job numbers and extent of opening hours and proposed operational characteristics and will be shared with

the Council once prepared. It will then be worked up in further detail with the Council and other stakeholders prior to the proposed use commencing and will be subject to periodic review once operational.

The Orangery/Swimming Pool

- 9.10 The outdoor heated swimming pool, which has fallen into considerable disrepair, will be fully restored. Alongside this, the Orangery will also be restored with a new glasshouse extension, and will be used as a gym/health facility (Use Class D2).
- 9.11 These facilities will, for the majority of the year, be for the use of residents of the Proposed Development; their maintenance will be subject to the annual service charge. However, as has been the case historically, it is proposed that the swimming pool and health facility will be opened up to the local community on certain days of the year for their enjoyment. This will be a great benefit and will enable local residents to access and make use of these heritage assets, fostering wider community cohesion.
- 9.12 It is also noted that the health facility will generate additional employment on site and potentially offer classes and treatments as well as both indirect and direct jobs in general maintenance and servicing.

The Public Realm

- 9.13 Enfield Council's Planning Statement refers to support for the reinstatement of footpaths, creation of new routes which link into other green networks and the creation of wider green infrastructure. It also refers to historic permissive public access throughout the university campus grounds and the desire to retain this with any future use at the site.
- 9.14 Berkeley has commissioned Murdoch Wickham, renowned historic landscape architects, to prepare a comprehensive site-wide masterplan. The key aim is to restore the historic landscape and enhance public access throughout the site, providing a new attraction at the heart of Trent Country Park where the site's history can be understood and enjoyed.
- 9.15 The restoration proposals are based upon the Heritage Landscape as identified by Barbara Simms (set out in detail in the accompanying Landscape Design Statement and Volume II of the ES). Whilst being historically correct, the proposals also seek to create an interconnected green grid which joins up the existing landscape assets to create a green web. This has naturally shaped the areas of development on site. A safe network of publically accessible footpaths and cycleways is proposed which will 'stitch in' to the surrounding networks, creating circular routes. As part of this, it is proposed to create a new bridge link to the Japanese Water Garden, connecting into Trent Country Park.
- 9.16 The landscape scheme also incorporates a sustainable drainage system located within the public realm in the form of swales, detention ponds and ditches which will be designed to deliver an exemplar holistic surface water

drainage system. This will combine engineering with landscaping to create a biodiverse and sustainable landscape using a naturalistic approach with varying profiles and fluvial alignments. The SUDs system will be planted with native aquatic marginal for seasonal interest and biodiversity. The total discharge will be controlled at greenfield runoff rate, in accordance with policy. Further detail on this approach is set out in the Drainage Strategy and the Landscape Design Statement.

- 9.17 In summary, the following will be delivered for the benefit of the public as part of the public realm:
- 1 Total of circa 3.2km of ungated new routes will be delivered (footpaths and cycleways)
 - 2 Over 12 hectares of historic landscape will be reinstated, including Lime Tree Avenue and Wisteria Walk
 - 3 Sassoon's Long Garden and other formal gardens will be restored
 - 4 447 new trees will be planted
 - 5 New modern landscaping including rose garden and new platform to the west of the West Wing
 - 6 Refurbishment of the statues and sculptures on the site
 - 7 Benches, picnic areas, bins, landscape features and bridges over swales and streams (part of the SUDs scheme)
 - 8 A new bridge link to the Japanese Water Garden
 - 9 Jogging routes with timber pieces of trim trail equipment for health and fitness
 - 10 Children's play areas using natural materials/structures
 - 11 Discrete lighting strategy with wayfinding
 - 12 A long term landscape management plan, implemented by an on-site estate management team.
- 9.18 These features will help support the delivery of the London Plan's 'Lifetime Neighbourhoods' (Policy 7.1) by enabling people to live healthy and active lives and maximising interaction and cohesion in a safe and accessible environment. The public realm will be comprehensible at a human scale, using gateways, focal points and landmarks along with furniture, different landscape treatments and infrastructure to create the highest quality of landscapes, in accordance with Policy 7.5. This also addresses the Council's aspirations set out under Core Policy 34 through "*...increasing the access to, quantity and quality of publicly accessible open spaces and supporting the community use of non-public open spaces*". This meets the requirements of policies DMD 72 and DMD 81.
- 9.19 The proposed landscape is a considerable benefit of this development which makes it unique. It far exceeds policy requirements in relation to its extent, quality, access and opportunity and meets Berkeley's key requirement: to sensitively restore the historic landscape whilst also enhancing public access.

Ecology/Biodiversity

- 9.20 The following measures are proposed as part of the public realm to enhance existing green infrastructure and ensure that there is no net loss in biodiversity as a result of the proposals, in accordance with policy:
- Landscaping planted with native species, grasses and flowering plants;
 - Provision of new habitats through restoration and maintenance of the existing parkland;
 - Installation of bat and bird boxes;
 - Enhancement of grassland areas for reptiles and invertebrate species;
 - Replacement of bat foraging and commuting habitat where removal of trees is proposed;
 - SUDS include a network of swales and attenuation ponds which will act as biodiversity corridors and provide enhanced habitats for a variety of species (including the Great Crested Newt)
 - Provision of green roofs for the Walled Garden houses and the Glade houses (the latter have integrated PV panels); and
 - Ensuring that the lighting strategy will to limit light spill onto sensitive habitats.
 - At future stages, measures will be developed to ensure that bat flight paths and reptile connectivity is maintained.
- 9.21 This is set out in full in the Environmental Statement (ecology chapter and appendices) and it is noted that the ecologists will be retained during the demolition, construction and refurbishment phase to provide further guidance and advice, ensuring that the ecological enhancements are implemented as part of the development.
- 9.22 This will be informed by a Habitat and Ecological Management Plan to be secured by condition. This will outline long-term strategies for maintaining the site's habitats (e.g. appropriate grassland management, avoidance of pesticides, suitable tree cover, and appropriate lighting design)
- 9.23 In summary, the proposals will meet the requirements set out under Policy 7.19 of the London Plan and LBE's Core Policy 36 and DMD 78 and 79, making a positive contribution towards the protection and enhancement of the site's existing biodiversity, creating and adding to its ecological interest and securing its ongoing management and wider access to nature. The adjoining Site of Metropolitan Importance for Nature Conservation and Site of Borough Importance for Nature Conservation will also be afforded the relevant level of protection.

10.0

Design and Amenity Standards

Design Standards

Internal Space Standards

10.1

The London Plan sets out minimum space standards for new development under Policy 3.5 (see Table 10.1 below). This is to ensure that new homes have adequately sized rooms and convenient and efficient room layouts which are functional and fit for purpose.

Table 10.1 Mayor's Minimum Space Standards for New Dwellings (London Plan 2016 Table 3.3)

Number of bedrooms	Number of bed spaces	Minimum GIA (m ²)			Built-in storage (m ²)
		1 storey dwellings	2 storey dwellings	3 storey dwellings	
1b	1p	39 (37)*			1.0
	2p	50	58		1.5
2b	3p	61	70		2.0
	4p	70	79		
3b	4p	74	84	90	2.5
	5p	86	93	99	
	6p	95	102	108	
4b	5p	90	97	103	3.0
	6p	99	106	112	
	7p	108	115	121	
	8p	117	124	130	
5b	6p	103	110	116	3.5
	7p	112	119	125	
	8p	121	128	134	
6b	7p	116	123	129	4.0

10.2

The scheme will deliver all 262 units in accordance with or exceedance of the above internal space standards and therefore complies with the London Plan. It will also meet Lifetime Homes standards. Detailed consideration has also been given to the Mayor's Housing SPG (2016) and London Housing Design Guide; their requirements have been incorporated into the detailed design of the houses and apartments. For instance, there are no more than eight flats per core in the apartment blocks and internal layout plans have been provided to demonstrate the accommodation of furniture and fixtures/fittings. All dwellings will receive good levels of daylight and sunlight due to the low density and layout configuration of the site, with a good level of glazing to all habitable rooms (roughly equivalent to 20% of the internal floor area). Berkeley also has a commitment to ensuring 2.5m ceiling heights for all new homes. Further detail is set out in the Design & Access Statement.

10.3

This fully accords with local policy DMD 8 which refers to the London Plan and mayoral guidance for minimum space standards and well-designed, flexible and functional internal layouts.

Amenity Space

- 10.4 In addition to over 12ha of public amenity space, as set out under Section 8.0 above, the Proposed Development delivers a significant quantum of communal and private amenity space in accordance with Mayoral and Enfield standards.
- 10.5 Policy DMD 9 sets out the detailed policy requirements for private and communal amenity space. As set out in the Design & Access Statement and Landscape Design Statement, the delivery of high quality spaces for the use of residents is one of the key priorities of this development and will form one of its unique qualities. The minimum standards will be met or exceeded in all cases.
- 10.6 The 740sqm of communal amenity space will only be accessible to residents and will be well overlooked by surrounding development. These spaces will also be accessible to physically impaired users and will form part of the estate-wide landscape management strategy, with integrated planting and hard surfaces.
- 10.7 In relation to private amenity space, this will be delivered in the form of private gardens and/or balconies/terraces. Each dwelling will exceed the Mayor's minimum standard of 5sqm for 1-2 person dwellings and an extra 1sqm for each additional occupant; each house will significantly exceed this.
- 10.8 Finally, in relation to child play space, the Mayor's child yield calculator has been used to generate the child yield from the development of 149 children. Across the age groups, this generates a need for 1,490sqm of play space, in accordance with London Plan Policy 3.6 and the Mayor's Supplementary Planning Guidance Providing for Children and Young People's Play and Informal Recreation.
- 10.9 1,490sqm is to be delivered on site, as set out in the Landscape Design Statement, with a core area for 5-11 year olds and 12+ (the 'Copse Play Area') and various spaces for under 5s referred to as the 'Oak Walk', 'South Lawn' and 'Copse' play areas. These spaces are designed to be appropriate to the historic landscape setting using natural elements and timber play equipment.
- 10.10 It should also be noted that the wider Trent Country Park provides a substantial resource for child play and recreation, including:
- 1 Accessible countryside with footpaths and woodland
 - 2 Go Ape
 - 3 Equestrian Centre
 - 4 Hockey Club
 - 5 Large, recently renovated playground
 - 6 Small playground adjacent to the Wildlife Centre
 - 7 Wildlife Centre

- 10.11 As set out earlier in this report, the Proposed Development will also deliver additional amenity benefits on site for residents (and the local community on set days of the year) including:
- 1 Restored heated outdoor swimming pool
 - 2 Gym/health facility
 - 3 Restored tennis courts
- 10.12 The landscape scheme also supports sustainable food production. The Walled Garden will provide raised beds which can be used by residents for food or flower growing. Other sections of the Walled Garden will be planted with espalier fruit trees. In addition, all detached homes will include front and rear gardens, providing the option of growing fruit, vegetables and herbs. This supports London Plan 7.22 which encourages spaces for community gardening.
- 10.13 In summary, therefore, the delivery of communal and private amenity space for the use of residents meets (and in the majority of cases exceeds) the minimum standards set out under LBE Policy DMD 9 and Mayoral guidance set out in the Housing SPG (2016). It also provides space for community food growing, in accordance with London Plan Policy 7.22. This is a significant benefit of the scheme, particularly given the quantum of public realm which is also being delivered as part of the Proposed Development.

11.0 Transport and Servicing

11.1 WSP | Parsons Brinckerhoff (WSP) has prepared a detailed Transport Assessment, Delivery and Servicing Plan, Travel Plan and Outline Construction Logistics Plan to accompany this application, and transport forms a detailed chapter of the Environmental Statement. The below provides a summary of these assessments but reference should be made to the relevant reports for further detail.

Transport Assessment

11.2 The Transport Assessment, prepared in accordance with policy DMD 48, concludes that the proposed development benefits from sufficient levels of public transport, pedestrian and cycling accessibility, together with accessibility to local amenities within the local community. In addition, the generated trips by each of the different modes of transport can be accommodated on the surrounding transport infrastructure.

11.3 Despite the Proposed Development being demonstrated to have a negligible impact on the surrounding transport network, a package of mitigation measures is proposed to help manage travel demand and encourage sustainable transport (see 'Travel Plan' below).

11.4 The proposed car and cycle parking facilities fully accord with the standards set in the London Plan 2016 (see Tables 11.1 and 11.2 below) and have been agreed in detailed pre-application discussions with LBE and TfL on the basis of the site's location and low PTAL level.

Table 11.1 Maximum Car Parking Standards

Number of Beds	4 bed	3 bed	2 bed
Residential	Up to 2 per unit	Up to 1.5 per unit	Less than 1 per unit

Source: London Plan 2016

Table 11.2 Minimum Cycle Parking Standards

Residential	Long-Stay	Short-Stay
	1 space per studio and 1 bed 2 spaces per all other dwellings	1 space per 40 units

Source: London Plan 2016

11.5 The London Plan does not set any specific maximum standards for Museums; however three disabled parking spaces will be provided as part of the development proposals. In addition, visitor and staff cycle parking will be delivered in excess of the minimum standards for a D1 community use. Again

this approach has been agreed as part of the pre-application discussions with the LBE Highways Officer.

- 11.6 Further to parking for the Proposed Development, it is also proposed to enhance the existing parking facilities for Southgate Hockey Club to make more efficient use of the space available, as the existing facilities are not adequate to meet demand. To further reduce pressure on the parking requirements, the Hockey Club will be able to make full use of the proposed shuttle bus service for both Southgate Club members and teams travelling to the club on weekends or during hockey festivals.
- 11.7 The proposals are in accordance with national and local policy requirements with regards to promoting sustainable transport initiatives and will, through design, encourage and promote the use of sustainable modes of transport whilst reducing private car use dependency. When compared to the previous University use it is demonstrated that there is a significant improvement in all highways and transport aspects, including new and improved pedestrian and cycle links, a reduction in overall car driver trips, together with improvements to the Snakes Lane/Bramley road junction, a shuttle bus service available to all members of the public and future residents and two car club spaces. The Proposed Development is therefore acceptable in transport terms.

Travel Plan

- 11.8 A Travel Plan accompanies this application and sets out various 'hard' and 'soft' measures to further encourage travel by more sustainable modes. These include the following:
- 1 Courtesy shuttle bus: This will be available for existing Trent Park residents and future residents and any visitors. In addition the bus will be available for staff and visitors of the museum/café, members/users of Southgate Hockey Club and members of the general public wishing to visit Trent Park. This will enable a significant number of existing users of Trent Park and the hockey club to access the park without the need to drive.
 - 2 Car Club: 2 spaces to be delivered on site.
 - 3 Cycle parking: 525 spaces to be delivered on site, 20 of which will be located at the bottom of Snakes Lane to encourage those using the local buses or Oakwood Station to cycle to Bramley Road.
 - 4 Public realm enhancements: New footways and cycleways.
 - 5 Broadband: Provided in all homes for flexible working.
 - 6 Travel pack: Provided to residents and visitors.
 - 7 Personalised journey planning service for those with mobility impairments.
 - 8 Car share: Car share partner matching service for residents
 - 9 Community notice boards: To provide travel and community information.

- 10 Developer website: Providing links to relevant public transport travel information, together with an electronic version of the Residential Travel Pack.
 - 11 Establish a Bicycle User Group.
 - 12 Personalised Journey Planning: Offered to all residents of the development throughout the lifetime of the Travel Plan.
- 11.9 The above fully accords with the requirements set under Core Policy 24 and DMD 48.

Construction, Deliveries and Servicing

- 11.10 A Deliveries and Servicing Management Plan (DSMP) and an Outline Construction Logistics Plan (OCLP) have been prepared to meet the requirements of policy DMD 48 and “...ensure that developments provide for safe and legal delivery, collection, construction and servicing including minimising the risk of collision with cyclists and pedestrians and set appropriate obligations to ensure compliance”.
- 11.11 The OCLP sets out the potential construction vehicle routing and frequencies associated with the development and assesses the anticipated impacts of construction traffic. It demonstrates that with the proposed mitigation measures, the construction can be undertaken with no adverse impacts on the site and its surroundings. A detailed Construction Management Plan will be prepared by the principal contractor once appointed in consultation with the Local Authority and Transport for London, secured via a planning condition.
- 11.12 The DSMP builds upon the servicing strategy outlined within the Transport Assessment and compliments the Travel Plan through the implementation of sustainable delivery initiatives in order to minimise their impact on the surrounding public highway. It sets out Berkeley’s commitment to manage the service vehicle trips to and from the site as part of the operational development.

Operational Waste

- 11.13 The Environmental Statement includes an Operational Waste Management Strategy which sets out the proposed waste storage areas and demonstrates how they address LBE requirements. The likely waste arisings have been calculated using the provisions set by the LBE in the ‘*Waste and Recycling Storage Planning Guidance*’. Waste storage provision has been made for mixed dry recyclables and residual waste for residential and non-residential land uses. In line with the LBE’s waste storage requirements, the residential refuse stores also provide food and garden waste storage.
- 11.14 Facilities will be easily accessible to enable and encourage future occupants to recycle. Proposed locations of waste and recycling storage facilities are also shown on the submitted planning drawings.

11.15

The Operational Waste Management Strategy also sets out the proposed strategy for the collection, storage and removal of waste, in accordance with relevant policy and guidance.

12.0 Energy/Sustainability

- 12.1 The Energy Statement, prepared by Hodkinson Consultancy, establishes the demand for the proposed development, applies the GLA's energy hierarchy (lean, clean, green) and proposes the selection of heating and cooling systems according to the order of preference in the London Plan (2016) and the LBE Development Management Document (2014).
- 12.2 The proposed buildings will meet or exceed Part L 2013 requirements through a combination of energy efficiency measures and renewable energy generation. The strategy for achieving this target is summarised in table 12.1 below.
- 12.3 Overheating risk has been assessed using three design weather years (1976, 1989 and 2003) and future weather data for the 2050's (high emission scenario). Results of this analysis show acceptable levels of overheating can be achieved for all units.

Table 12.1 Summary of Energy Measures as detailed in Hodkinson's Energy Statement

	New build houses	New build apartments	Refurbished buildings
	Anticipated Reduction in CO₂ compared to Building Regulations 2013 Part L requirements (<i>GLA Target = 35% improvement</i>)		
	Up to 43% (<i>Exceeds GLA target by 8%</i>)	Up to 48% (<i>Exceeds GLA target by 13%</i>)	35% (<i>Meets GLA target</i>)
Be lean measures	Energy efficiency measures include: high-performance double glazing, highly insulated masonry cavity walls, airtight construction and high-efficiency plant, equipment and lighting. Measures to reduce demand for cooling include: high thermal mass, overshadowing from deciduous trees, balconies and overhangs, openable windows to permit natural ventilation and night purging, limited glazing ratios, low g-value glazing, and evaporative cooling from green open spaces and water features.		

		Note: Due to the conservation status of the Mansion House and Stable Blocks, it is anticipated that, for these buildings, the 35% target will be met through loft insulation and new boilers only.
Be clean measures	The potential for establishing or connecting to a district heating network (DHN) has been evaluated in accordance with London Plan guidance and DMD 52 'Decentralised Energy Networks'. There are no existing or proposed DHN's in the area. The density and size of the development render it unsuitable for a DHN, as outlined in Section 11 of the GLA's guidance on preparing energy assessments (2016). A community heating scheme is also not considered appropriate; as the apartment blocks are spaced around the development, residents would enjoy a low reduction in CO ₂ but would incur high heat bills. The proposed solution is to provide high-efficiency gas boilers to all dwellings.	
Be green measures	Approximately 300kWp of solar PV panels are to be installed at appropriate locations across the site, i.e. on the roofs of new build houses and apartments. PV panels are not proposed for incorporation on the existing buildings, as these are considered to have a potentially detrimental impact on the character of the buildings.	

12.4 AECOM has also prepared an overarching Sustainability Statement for the proposed development which accompanies this application. It draws together the various sustainable aspects of the site, many of which have been considered as part of the various sections of this Planning Statement.

12.5 In summary, the development will minimise energy-related carbon emissions in accordance with the energy hierarchy set out under LBE policies DMD 51 and 53, along with London Plan policies 5.2, 5.3, 5.4 and 5.7. It will also integrate a significant amount of urban greening through tree planting, landscaping and green roofs, in accordance with London Plan policies 5.10 and 5.11. The scheme will deliver an efficient and sustainable development.

13.0 **Other Environmental Issues**

- 13.1 The Environmental Statement assesses various other environmental factors at the site including air quality, noise, flood risk and drainage. The detailed assessments, proposed mitigation and associated effects are not repeated in detail in this Planning Statement and reference should be made to the relevant chapters and associated technical appendices.
- 13.2 In summary, as set out in the Non-Technical Summary, the proposed development will have an overall beneficial effect on many environmental aspects of the site and its surroundings and a neutral effect on others. It will have no adverse environmental effects following the proposed mitigation measures other than in relation to effects on road users / vehicles at Snakes Lane, noise from road traffic and to 2 of 38 local views. However, significant beneficial socio-economic effects are identified in relation to: employment, additional local spending by residents, affordable housing provision, play space provision, sport and leisure provision, crime and safety, and provision of housing and open space. Other beneficial effects (some of which are also significant) relate to the effect on users / vehicles of local roads; pedestrians; the Trent Park Site of Metropolitan Importance for Nature Conservation; bluebell habitat; great crested newt habitat; and views of the Proposed Development.
- 13.3 Whilst it is acknowledged that some adverse effects will be experienced during the (temporary) demolition, construction and refurbishment phase, once the Proposed Development is completed and operational the benefits are considered to far outweigh these adverse effects. The Proposed Development will have an overriding beneficial effect and will regenerate and enhance the site, contribute to the setting of the wider area, and will secure the comprehensive redevelopment and ongoing management of the site.
- 13.4 More importantly, the Environmental Assessment has demonstrated and concluded that there will be no significant adverse environmental impacts arising from the Proposed Development to warrant refusal of the planning application.

14.0 **Legal Obligations and Heads of Terms**

14.1 It is anticipated that the Heads of Terms of a S106 legal agreement will be discussed in detail with LBE as part of the consideration of this application. Having reviewed the Council's S106 SPD (and the current draft out for consultation, including reference to the Inspector's decision on LBE's CIL Charging Schedule) we have set out below the obligations we consider will be relevant to this proposal:

- 1 Highways works to Bramley Road/Snakes Lane junction.
- 2 Employment and training opportunities as part of the construction programme including apprenticeships and local labour, including an Employment and Skills Strategy.
- 3 Implementation of the Travel Plan measures including the shuttle bus.
- 4 Landscape restoration scheme and future management strategy.
- 5 Programme of works to the heritage assets on site.
- 6 Grant of lease and operations plan for the museum/event space/café with a review mechanism.

14.2 The draft S106 SPD sets out obligations which 'may' be required from residential development of 50+ units. This will be discussed in further detail with LBE following submission of the application.

14.3 The Community Infrastructure Levy (LBE and Mayoral) applies to all proposed floorspace on site (given it has been vacant for the last four years and VBC applies) and will therefore be paid in due course.

15.0

Conclusions

15.1

This Planning Statement provides a comprehensive assessment of the residential-led proposals for the former Middlesex University Campus, Trent Park and the significant benefits which Berkeley's scheme would deliver for the site, its heritage assets and the wider community. The key benefits include:

- 1 Demolition of the inappropriate 1960s/70s buildings on site
- 2 Reinstatement of historic views across the site and restoration of the setting of the Mansion House
- 3 The sustainable re-use of a vacant brownfield site
- 4 6,000sqm of heritage assets and other structures (including their settings) restored to their former glory
- 5 Public access to the most significant parts of the Mansion House for the first time in its history in the form of a viable and sustainable museum, café and events space to celebrate the history of Trent Park
- 6 The delivery of 262 new homes with a range of unit sizes, including a significant proportion of family dwellings, all meeting or exceeding minimum space standards
- 7 A high quality of design and materials, with homes sensitively located and contextually appropriate to their setting
- 8 The delivery of a policy compliant level of affordable housing for the benefit of residents of LBE
- 9 Comprehensive historic landscape restoration scheme to include the planting of 447 new trees and the reinstatement of Lime Tree Avenue, Wisteria Walk and Sassoon's Long Garden, with associated ecology and biodiversity benefits
- 10 Enhancements to the openness of the Green Belt and its character and appearance
- 11 Ungated public access to over 12ha of open space with over 3km of walking/cycling routes linking into the surrounding Trent Country Park, with a new bridge into the Japanese Garden
- 12 A site-wide exemplar sustainable urban drainage scheme with ponds, swales and ditches
- 13 A high level of environmental performance with a 35% or more reduction in CO2 emissions over the existing baseline
- 14 A shuttle bus for use by all residents and members of the public, connecting the site with Oakwood
- 15 Works to the junction of Bramley Road/Snakes Lane with upgraded pedestrian crossings
- 16 Reduced vehicular movements to those experienced when the University was in operation

- 17 Improved parking facilities for Southgate Hockey Club to formalise parking arrangements on the Application Site
- 18 Delivery of various health and leisure facilities on site including the Orangery gym, the restored Swimming Pool and tennis courts, trim trails with equipment and equipped children's play areas, along with facilities for food growing and sustainable living
- 19 A highly qualified estate management team to secure the future of the buildings and grounds and ensure they are of the highest quality
- 20 Construction and operational jobs including apprenticeships and skills/training
- 21 Significant annual resident expenditure in shops and services in the local Enfield area

15.2 These planning and heritage benefits, summarised in the below infographic, militate strongly in favour of the grant of planning permission and listed building consent and will secure the comprehensive redevelopment and ongoing management of the site, as sought by LBE. We trust the Council agrees with this analysis of the merits of the proposals and can support this application.

15.3 When determining applications for planning permission, Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires local planning authorities to begin by having regard to the 'development plan'. If the Authority concludes that the development plan contains provisions that are of relevance, it must determine the application in accordance with the development plan unless material considerations indicate otherwise. When considering and assessing the Proposed Development in the light of the clear significant benefits and coupled with the absence of harm and general compliance with policy, planning permission and listed building consent should be granted.



Appendix 1 Alternative Uses Report



Nathaniel Lichfield
& Partners
Planning. Design. Economics.

**Former Middlesex University Campus,
Trent Park**

Alternative Uses Report

Assessment of Alternative Uses for the
Mansion House at Trent Park

Berkeley Homes (North East London)
Limited

13 July 2016

14713/IR/SH

Nathaniel Lichfield & Partners
14 Regent's Wharf
All Saints Street
London N1 9RL

nlplanning.com

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Appendices

- Appendix 1 Strategy Note (23 March 2016)
- Appendix 2 Alternative Uses Summary Matrix
- Appendix 3 WSP Alternative Uses Transport Impacts Table
- Appendix 4 B1 Office Use Layout Options
- Appendix 5 Internal Hotel Layout Plans
- Appendix 6 Retirement/Care Home Layout Plans
- Appendix 7 Educational Layout Plans
- Appendix 8 Listed Building Restrictions
- Appendix 9 Place of Worship Layout Plans
- Appendix 10 Sport/Leisure Layout Plans

1.0 Executive Summary

1.1 This Alternative Uses Report (AUR) has been prepared on behalf of Berkeley Homes (North East London) Ltd to provide an assessment of alternative uses to residential within the Mansion House (and additional buildings/space on site where necessary for the purposes of the specific operations) at the Former Middlesex University Campus, Trent Park. The AUR has been prepared in conjunction with relevant officers at the London Borough of Enfield (LBE) who have reviewed and commented on previous drafts.

1.2 The following uses have been assessed:

- 1 The proposed residential-led development (Use Class C3)
- 2 Office / headquarters / research and development (Use Class B1)
- 3 Hotel (Use Class C1)
- 4 Retirement home / older care accommodation (Use Class C2)
- 5 Primary and/or Secondary and/or special educational needs school (Use Class D1)
- 6 Museum (or similar community type use) (Use Class D1)
- 7 Place of worship / religious institution (Use Class D1)
- 8 High-end sport / leisure (Use Class D2)

1.3 Each use has been assessed against a methodology agreed with LBE to include the following key considerations:

- 1 Design and operational considerations;
- 2 Planning policy; and
- 3 Commercial market and viability.

1.4 In addition, each section of the report includes a secondary qualitative assessment which considers where a mix of the above uses (including residential) within the Mansion House might be compatible and the benefits and issues associated with each.

1.5 The findings of each use assessed are set out in the below summary table 1.1, which is colour coded as follows:

- 1 Red = Significant issues with meeting this assessment criteria
- 2 Orange = Partially meets this assessment criteria (i.e. issue can be overcome with some mitigation/sensitive planning/balancing of the planning merits)
- 3 Green = Meets this assessment criteria

1.6 In summary, the use(s) with the greatest number of green categories is considered to be the most suitable and the use(s) with the greatest number of red categories the least suitable. The assessment demonstrates that

residential (Use Class C3) and retirement home/older care accommodation (Use Class C2) receive the highest score and are considered the most suitable uses.



Table 1.1 Summary of Alternative Uses Assessment

Proposed Use	Extent of Development		Key Issues Assessed							
	Mansion House Only?	Mansion House and Additional Buildings?	Significance of Interventions to the Listed Building and DDA Access	Planning Policy Compliance	Historic Landscape Impact	Public Access	Green Belt Impact	Traffic and Transport	Commercially Appropriate	Viable Option
Residential		✓	Green	Yellow	Green	Yellow	Green	Yellow	Green	Green
Office/HQ/ Research and Development		✓	Yellow	Red	Yellow	Red	Yellow	Red	Red	Yellow
Hotel	✓	✓	Red	Yellow	Green	Yellow	Green	Red	Yellow	Yellow
Retirement Home/ Older Care Accommodation	✓	✓	Yellow	Yellow	Green	Yellow	Green	Yellow	Green	Green
Educational Uses	✓	✓	Red	Green	Yellow	Yellow	Yellow	Red	Red	Yellow
Museum/ Community Use	✓		Red	Yellow	Green	Green	Green	Red	Red	Red
Place of Worship/ Religious Institution	✓	✓	Yellow	Yellow	Yellow	Yellow	Green	Red	Red	Red
Sport/ Leisure		✓	Red	Yellow	Red	Yellow	Yellow	Red	Yellow	Yellow

2.0 Introduction

- 2.1 This Alternative Uses Report (AUR) has been prepared on behalf of Berkeley Homes (North East London) Limited to provide an assessment of alternative uses to residential within the Mansion House (and its surrounding site, if necessary for the operations of that specific use) at the Former Middlesex University Campus, Trent Park, Cockfosters.
- 2.2 The report has been prepared following pre-application discussions with officers at the London Borough of Enfield (LBE) who request that alternative uses to residential are explored to understand whether they would involve less physical intervention to the house (particularly the main ground floor historic rooms) and provide enhanced public access opportunities to the three principal rooms within the Mansion. This is to provide a better understanding of whether the proposed residential conversion of the Mansion House is considered an appropriate option. LBE also requested that the primary assessment covers uses which may occupy the Mansion House only or the Mansion House plus additional buildings/space on the site necessary for their operations, with a secondary analysis of a range of potentially compatible uses within the Mansion House. This is set out within a summary matrix at Appendix 2.
- 2.3 In relation to the proposed methodology, the AUR takes into account feedback from LBE on a Strategy Note (23 March 2016) which was prepared in advance of the preparation of this report (see Appendix 1). The starting point for this was the uses identified in the Trent Park Planning Statement (July 2012) which was prepared to set out LBE's views on the future of the site and to provide the basis for considering future land use options. Key priorities include securing an appropriate long term and viable use for the site that delivers the protection and enhancement of both the site's built and landscape heritage.
- 2.4 The following alternative uses are identified in the Council's Planning Statement:
- 1 Office / headquarters / research and development (Use Class B1)
 - 2 Hotel (Use Class C1)
 - 3 Retirement home / older care accommodation (Use Class C2)
 - 4 Primary and/or Secondary and/or special educational needs school (Use Class D1)
 - 5 Museum (or similar community type use) (Use Class D1)
 - 6 Place of worship / religious institution (Use Class D1)
 - 7 High-end sport / leisure (Use Class D2)
- 2.5 LBE's Planning Statement referred only to "...*institutional residential, or residential as ancillary*" when considering alternative uses for the site. It was agreed with LBE through pre-application discussions that this approach was

out-dated, both in the context of current policy and on the basis of demand for the site following its marketing in 2012 and 2015. It was therefore agreed with LBE that as part of the detailed exploration of the suitability and acceptability of residential use on the site, the above list of alternative uses should be considered to ensure the proposed approach was fully justified. This detailed consideration of the alternative uses forms the content of this AUR.

Background

- 2.6 The Mansion House is located within the Former Middlesex University Campus (site area of 21 hectares) which sits within the wider Trent Park Country Park (approximately 380 hectares) with its rich history dating back to the early 12th Century.
- 2.7 Trent Park was part of Enfield Chase in the medieval period but was in use as a country estate by the late 17th Century. The current Mansion House, which dates to the late 18th century, was substantially remodelled in the 1890s and later in the 1920s. The surrounding parkland was landscaped in the 18th century and is now characterised by the formal gardens which were laid out in the 1920s when the manor house was re-clad and substantially altered internally. The house was turned to educational uses following its acquisition by the Council after the Second World War and subsequently expanded to accommodate Middlesex University (formerly Middlesex Polytechnic) from 1974. The site, including the Mansion House, was vacated by the University in 2013.
- 2.8 The Mansion House itself is listed Grade II (first listed in 1974), and the surrounding parkland is Grade II registered, as well as being designated a Conservation Area. A number of statues within the parkland are of historic value and are listed in their own right. In total there are approximately 25 buildings and historic statues scattered across the site, including buildings associated with the historic use as a Country Estate, many of which are locally listed or identified as positive contributors to the character and appearance of the Trent Park Conservation Area. Alongside the Mansion House and these other more historic buildings, the Campus includes a number of post-war higher educational buildings, mostly dating to the 1960s and 1970s, after the mansion was put to use as a teacher training school.

Description of the Mansion House

- 2.9 A villa was first commissioned on the estate by Sir Richard Jebb, physician to King George III, in the late 18th century. The royal architect, Sir William Chambers, was appointed to build this house, and parts of it still remain today. The villa was extended and amended by later owners until Francis Bevan undertook a major remodelling of the house in the 1890s in an early Georgian style. The house and gardens were subsequently subject to further major change when Sir Philip Sasson inherited Trent Park and re-clad the entire house in a 'Wrenaissance' style using bricks and doorcases from demolished London mansions (1925-31).

- 2.10 During World War II the estate was requisitioned by the War Office to be used as a highly specialised prisoner of war camp, run by a Secret Service unit known as MI19, using room-bugging, eavesdropping and passive manipulation techniques to gain intelligence to assist the war effort.
- 2.11 In 1947, the estate was taken over by the Ministry of Education and the House was used as a teacher training facility (Trent Park College) from 1950 onwards, which then became Middlesex Polytechnic in 1974 and Middlesex University in 1992.
- 2.12 The Mansion House is three storeys in height with a basement. It comprises red brick with stone quoins, bands and window architraves. Thirteen sash windows expand across the front elevation. The central door case has a Corinthian entablature with serpentine open pediment. A balustrade stretches along the front elevation to the basement areas and classical statues and urns are strategically positioned around the elevations.
- 2.13 The terrace areas immediately adjacent to the House were put on the Heritage at Risk Register in 2006 as they were at immediate risk of further rapid deterioration or loss of fabric. These have been protected and stabilised by Berkeley to prevent further deterioration whilst proposals are drawn up for the mansion and the works taken forward.
- 2.14 The Mansion House is architecturally significant for its early 20th century 'Wrennaissance' style, part of which was designed by architect Philip Tilden. Lenygon and Morant also designed the 18th Century style interiors. The symmetrical red brick facades, surrounded largely by open space, presents an imposing frontage both to the front and to the rear of the re-faced building. Internally there are interiors of decorative value, including the entrance hall and staircase, the inter-connecting reception rooms, panels of Chinese wall-paper mounted in the Saloon, and painted decoration by Rex Whistler in the end rooms. The other rooms of significance in terms of their historic fabric and precedence are the Green Room, the Blue Room and Sassoon's/Kendrick's office. However, the remaining rooms on the ground floor, and the entirety of the upper floors, have been much altered since the War years and have no remaining features of value.
- 2.15 The surrounding landscape of lawns and lakes were designed to intensify the grandeur of the Mansion House within its parkland setting. Views through the park were designed to create impressive formal vistas, and the terrace plays an important role in connecting the House to the surrounding parkland; by wrapping around the north and east sides it leads the eye through the distant landscape beyond. This is from prior to the Bevan period and then the works to the landscapes undertaken by the Bevans and Sir Phillip Sassoon.

The Need for an Alternative Use Assessment

- 2.16 Following the site's vacation by Middlesex University in 2013, it was purchased by the Allianza University College of Medical Sciences (AUCMS). AUCMS went into liquidation in November 2014, leaving the site with an

uncertain future. The former university campus, which had been vacant for three years, was put up for sale and acquired by Berkeley in September 2015. A more detailed summary of the marketing of the site in 2012 and 2015 is set out at para. 2.19-2.29. Berkeley is now working with a team of specialist advisers to secure a long-term solution for the site and its heritage assets, based on a conservation and landscape-led approach which will benefit current and future generations. In summary, Berkeley's plans for the site comprise residential-led development (Use Class C3), with the potential for some non-residential uses, focused on the restoration of the site's listed heritage assets and landscape including the Mansion House.

2.17 As part of the Council's consideration of the site's future, the Trent Park Planning Statement was prepared in 2012 to set out LBE's views on future land use options. Key priorities in this Statement include securing an appropriate long term use for the site that delivers the protection and enhancement of both the site's built and landscape heritage. Whilst it is noted that this may include residential as an enabler use, the following alternative uses are identified in the Planning Statement for the Mansion House and the surrounding site:

- 1 Office / headquarters / research and development (Use Class B1)
- 2 Hotel (Use Class C1)
- 3 Retirement home / older care accommodation (Use Class C2)
- 4 Primary and/or Secondary school (Use Class D1)
- 5 Museum (or similar community type use) (Use Class D1)
- 6 Place of worship / religious institution (Use Class D1)
- 7 High-end sport / leisure (Use Class D2)

2.18 As part of our pre-application discussions with LBE, we have presented Berkeley's proposed residential-led development of the former campus site (including the residential use of the Mansion House). Officers have requested a more detailed understanding of a range of alternative uses for the Mansion House (and its surrounding site, if additional buildings/space are necessary for the purposes of that use's operations) to ascertain their potential impact on the heritage asset, both in terms of physical interventions to the historic fabric and public access opportunities to the building and wider site, when compared to a residential use with some non-residential use in the Mansion House. Officers have also requested a detailed understanding in relation to where a mix of the above uses (including residential) within the Mansion House might be compatible and the benefits and issues associated with each. This report provides this further information as requested.

Marketing History

2.19 Middlesex University's decision to vacate the Trent Park Campus followed the refusal of planning permission in 2005 to increase density on the campus. Whilst planning officers supported the proposals, Committee Members

refused the scheme and the University sought to relocate its operations to the Hendon Campus, supported by Barnet Council (which was keen for the University to locate the whole of its operations within the Borough).

- 2.20 Prior to the official commencement of the marketing campaign, Jones Lang LaSalle (JLL) had commenced covert marketing initiatives through its databases, as well as through buying agency teams at Knight Frank, Savills, Property Vision and James Andrew International. The marketing campaign started in earnest on the 17 January 2012 with the insertion of an advertisement in Estates Gazette. Trent Park Campus was also advertised in Country Life, British Airways Inflight magazine and Emirates in-flight magazine, with a number of enquiries coming through these channels.
- 2.21 The marketing campaign was accompanied by a high-quality hardback sales brochure, which was well received, and a dedicated website to hold all of the legal, planning and technical disposal information. There were 229 unique requests for log in details to the website. 25 individual inspections of the site were carried out – each comprising various property professionals including architects, planners, and other technical specialists, as well as funding partners where appropriate. Eight technical teams requested additional access to the site, in order to bring other specialists, such as heritage and ecological expertise to assist their bidding effort.
- 2.22 Initial offers were taken on 30 March, and after shortlisting, best and final offers were sought on 1 May 2012. Following receipt of bids, four parties were identified for short-listing, although ultimately 3 parties were interviewed. Two parties had a clear strategy to continue using most or all of the campus for education, while the remaining party had an interim education solution while a residential-led development was formulated.
- 2.23 Ultimately the preferred purchaser elected was a higher education provider which was reliant on seeking third party funding for the purchase of the asset. After an extended period of time the contract was withdrawn due to the inability of the preferred party to secure third party funding for the development. Upon instructions from Middlesex University, JLL withdrew the asset from the market until September 2012.

Marketing and Sale September 2012

- 2.24 The marketing campaign commenced with a redistribution of the marketing particulars to the parties who had previously either registered their interest or submitted a formal offer. This was followed by the re-insertion of an advertisement in the Estates Gazette on the 15th September and the launch of a dedicated website. Prior to the re-release of the marketing details, JLL had in excess of 260 unique requests for login details. JLL arranged for a further five inspections, in addition to the previous 25 individual inspections of the site – each comprising various property professionals.
- 2.25 The preferred purchaser was a Malaysian Medical College (ACMS) with significant financial backing and a strong desire to open a UK based campus.

The site was sold on an unconditional basis to the party, at which point Middlesex University ceased all operations at the site.

- 2.26 Despite significant financial backing, AUCMS were unable to make the project work financially, which was in part the result of the site's location, and the difficulty of attracting international students to a campus at some distance from the centre of London. AUCMS subsequently went into administration.

Marketing and Sale 2015

- 2.27 JLL became aware that AUCMS's plans were not proceeding in the manner expected during early 2014. JLL was invited to pitch for the Joint LPA receivership instruction on behalf of Export-Import Bank of Malaysia BHD in May 2014, and was formally instructed on 1st April 2015. Given the transactional history and the sensitivity of the Joint LPA receivership instruction, a deliverable bid, on wholly unconditional terms, was sought.
- 2.28 A preferred bidder was selected, at the Receiver's discretion, after which the legally binding loan sale documentation were executed and the land sale to Berkeley was exchanged on unconditional terms on the 28th August 2015 and the sale completed on 18th September 2015.
- 2.29 In contrast to the 2012 marketing of the site, in 2015 there was no standalone educational interest when the site was marketed. Only one of the bidders considered bringing in a school as part of their bid, but the free school only wanted the listed house and stable, which created a substantial loss in the wider development value, and this was ultimately considered unviable by the bidder. The bidder did not proceed as it was apparent that any significant educational use would be less than offers for other uses on the site. As the receivers are required to achieve best value, this bid was not favoured.

Structure of Report

- 2.30 This report is structured as follows:
- Section 3 – Methodology for Alternative Uses Assessment
 - Section 4 – The Proposed Residential Development
 - Section 5 – Office / headquarters
 - Section 6 – Hotel
 - Section 7 – Retirement home
 - Section 8 – Education
 - Section 9 – Museum / community use
 - Section 10 – Place of worship / religious institution
 - Section 11 – Sport / leisure
 - Section 12 – Implications of Alternative Uses
 - Section 13 – Conclusions

3.0 **Methodology for Alternative Uses Assessment**

- 3.1 The proposed methodology for this AUR was initially set out in a Strategy Note (23 March 2016) which was shared with LBE officers for their comment. This was discussed in detail with development management and planning policy officers at various pre-application meetings in April and May 2016 and developed with officer input to inform the below methodology. In addition, in conjunction with LBE, a matrix was prepared in May 2016 (see Appendix 2) to clearly set out the uses to be assessed and provide further detail on compatible uses and their location on site; this was agreed by LBE and finalised prior to the final drafting of this AUR. The methodology applied in this Report therefore incorporates comprehensive feedback and input from LBE's Planning Team (development management and planning policy). LBE officers have also reviewed previous drafts of this AUR and provided comments, which have been addressed as part of the final report.
- 3.2 A qualitative and quantitative assessment of each of the following alternative uses will be undertaken, along with the proposed residential development:
- 1 Office / headquarters / research and development (Use Class B1)
 - 2 Hotel (Use Class C1)
 - 3 Retirement home / older care accommodation (Use Class C2)
 - 4 Primary and/or Secondary and/or special educational needs school (Use Class D1)
 - 5 Museum (or similar community type use) (Use Class D1)
 - 6 Place of worship / religious institution (Use Class D1)
 - 7 High-end sport / leisure (Use Class D2)
- 3.3 In consultation with LBE, we have considered where each of the above uses could be accommodated within the Mansion House only, or where additional buildings/space on the site are necessary for the purposes of the specific operations. This ensures that no use is simply excluded on the basis that the Mansion House does not provide enough floorspace/outdoor facilities to support that use. This is summarised in the matrix at Appendix 2.
- 3.4 Each use will primarily be assessed against the following criteria:
- 1 Design and operational considerations (with specialist input provided by ADAM Architecture and Giles Quarme & Associates);
 - 2 Planning policy (with specialist transport input provided by WSP); and
 - 3 Commercial market and viability (with specialist input provided by JLL).
- 3.5 The scope of each of these topic areas is set out in further detail below.

- 3.6 In addition, each section of this report (i.e. each use) will include a secondary qualitative assessment which considers where a mix of the above uses (including residential) within the Mansion House might be compatible and the benefits and issues associated with each. The matrix of the compatible mix of uses, as discussed and agreed with LBE as part of the pre-application process, is provided at Appendix 2.

Design and Operational Considerations

- 3.7 The AUR will consider feasibility options for each alternative use to understand whether:
- 1 The Mansion House can be converted to the alternative use and the impact of this from a historic building and conservation perspective
 - 2 The alternative use would permit continued public access across the site
 - 3 The alternative use could be accommodated within the Mansion House to allow public access to the three principal ground floor rooms within the Mansion and the impact on the internal fabric of these rooms
 - 4 The proposed alternative use will provide an opportunity to understand and access the heritage value and history of the Mansion House and wider estate
 - 5 The alternative use could comply with building regulations (including DDA compliance) for that use
 - 6 Servicing and operational requirements.

Planning Policy

- 3.8 This AUR assesses each of the above uses against the statutory development plan including the London Plan (2015), Enfield's Core Strategy and Enfield's Development Management DPD. It includes an assessment of:
- 1 The compliance of the alternative use in land use designation terms and policies in the statutory development plan
 - 2 The impact of the use on the Grade II heritage asset and Green Belt
 - 3 The impact on the wider Trent Park Country Park
 - 4 The impact of the use on transport and accessibility
 - 5 Evidence of supply and demand for this use in this location in the Borough in policy terms
 - 6 The social and economic impacts of the alternative use in terms of employment creation and on local services.

Commercial and Viability Assessment

- 3.9 The AUR considers information gathered by commercial agents, including from those that have previously marketed the site, and provides feedback on:

- 1 The marketing of the site (for each proposed use) and interest from alternative use providers
- 2 The supply and demand for the alternative use in this location
- 3 The level of investment and / improvement required to convert the Mansion House to the proposed use. Where appropriate, a comparison with other employment / similar sites
- 4 The ability of the proposed use to manage and sustain the heritage asset and surrounding historic landscaping from a viability perspective.

3.10

Section 4.0 of this URA sets out the proposed residential development and assesses this in the context of the above. Sections 5.0 – 11.0 of this AUR then set out a detailed review of each of the alternative uses against the above topics, with a secondary qualitative assessment of the potential mix of compatible uses which could be accommodated within the Mansion House. Section 12.0 looks at the implications of the alternative uses in further detail. Section 13.0 sets out the conclusions of the AUR.

4.0

The Proposed Residential Development

Introduction

- 4.1 Following acquisition of the site, Berkeley has been working with a team of specialist advisers to secure a long-term solution for the site. Given the current condition of the site's heritage assets, including the Mansion House/terrace, Orangery, Stables, Wisteria Walk, various statues and the landscape, a comprehensive site-wide restoration and ongoing conservation strategy is necessary which involves significant costs (capital and revenue) and sensitive short, medium and long term management.
- 4.2 During the marketing of the site (following the liquidation of AUCMS) it became apparent that these costs were preventative to many potential purchasers/ occupiers, as set out in detail at Section 8.0 of this report. However, a potentially viable option was the proposal for a residential-led scheme (Use Class C3) which would generate the level of capital required to restore the site's heritage assets, enable a comprehensive approach to the redevelopment of the Major Developed Site, secure the necessary site-wide landscape management through revenue generation and the restoration and re-use of the listed buildings– with significant conservation gains.
- 4.3 In the context of other key planning policy considerations, such as the significant and growing housing need in London and Enfield's confirmed lack of requirement for a Council educational facility in this location, Berkeley has considered options for the site. With specialist advice, Berkeley considers that a residential-led redevelopment based on a comprehensive masterplan is an appropriate approach.
- 4.4 It is in this context that LBE has asked Berkeley and its team to consider the potential alternatives to the proposed residential use, to understand whether such use may be more viable or preferable in heritage terms, when compared to the scheme as proposed, with a view to securing the most appropriate land use for the site's sustainable future whilst ensuring this is appropriate in Green belt terms.

The Proposed Scheme

- 4.5 The scheme is still evolving at the time of this report drafting, but currently comprises:
- 1 Removal of the intrusive modern former university buildings and the delivery of around 250 homes (conversion of existing buildings and new build) which are contextually appropriate to the setting of the historic buildings and landscape.
 - 2 Restoration of the Mansion House and other historic buildings including the Orangery and the Stables as part of their change of use to residential use.

- 3 Restoration of the historic landscape including the reinstatement and restoration of key landscape features such as Lime Tree Avenue, the walled garden and Wisteria Walk and key views into and out of the site.
- 4 Public access to the Mansion House for the first time through the provision of a community facility (D1 Use Class) at part ground and part basement level.
- 5 Continued and enhanced public access across the site and its integration into the wider Trent Country Park.

Assessment of Residential Use of Mansion House

Policy Considerations

- 4.6 This section considers the policy context for the residential use of the Mansion House only. As set out under the methodology, and as agreed with LBE officers, it does not assess residential on the rest of the site as the Mansion House could be converted to residential use without the need (in land-use terms rather than viability) for additional buildings/space to enable its conversion. The justification for residential use of the wider site will be explained in the Planning Statement.
- 4.7 The National Planning Policy Guidance sets out under 'Conserving and Enhancing the Historic Environment' para. 15 that if there is only one viable use for a heritage asset, that use is the optimum viable use. However, *"...if there are a range of alternative viable uses, the optimum use is the one likely to cause the least harm to the significance of the asset, not just through necessary initial changes, but also as a result of subsequent wear and tear and likely future changes"*. It is also noted that the optimum use may not be the most profitable one, and also that the optimal use may be the original use but that may no longer be economically viable or the most compatible with long-term conservation of the asset. The NPPG also states that *"...if from a conservation point of view there is no real difference between viable uses, then the choice of use is a decision for the owner"*.
- 4.8 It is in this context that this AUR has been prepared, considering a range of alternative uses to understand which of these are viable and therefore whether there is one or more optimum use which should be taken forward as part of Berkeley's proposals for the site.
- 4.9 Subject to the NPPG considerations of viability and long-term conservation, it is generally accepted that the most appropriate use for a historic building is that for which it was originally designed. This relates to the building's historic value and is set out under Historic England's 'Conservation Principles: Policies and Guidance for the Sustainable Management of the Historic Environment' (2008):

“The use and appropriate management of a place for its original purpose, for example as a place of recreation or worship, or, like a watermill, as a machine, illustrates the relationship between design and function, and so may make a major contribution to its historical values. If so, cessation of that activity will diminish those values and, in the case of some specialised landscapes and buildings, may essentially destroy them” (para. 45).

- 4.10 In the case of the Mansion House, it was designed, built and used over three centuries as a large residential dwelling; it was a private home up until World War II when the estate was requisitioned by the Government. The change of use of the building to educational in 1947, when it was taken over by Middlesex County Council as a teacher training facility (which then became Middlesex Polytechnic in 1974 and Middlesex University in 1992) has had a number of detrimental impacts on the Mansion House, with various inappropriate insertions and damage to important historic fabric which have diminished the value of the building’s interiors. For example, the insertion of a large amount of computer wiring and structural strengthening of floor loads for educational/ancillary office use have included large steels, extra floors, lowering of ceilings and inappropriate additions and removal of historic fabric. The building was not designed for this use and it is not considered the most appropriate for this asset. The Mansion was designed and used as a dwelling for the majority of its life and much of its significance relates to its residential history. Re-introducing a residential use (Class C3) is therefore considered appropriate.
- 4.11 In addition, the proposal must be considered in the context of significant and pressing housing need in London, and the NPPF’s ‘presumption in favour of sustainable development’. The London Plan sets a minimum housing delivery target for LB Enfield of 7,976 new homes from 2015-2025, with an annual minimum target of 798 dwellings. This exceeds the identified target in the Council’s Core Strategy Policy 2 (which was adopted in 2010 and pre-dates the 2015 London Plan).

Design Considerations Associated with Conversion

The Mansion House

- 4.12 In relation to the Building Regulations, the residential use of the Mansion House imposes minimal impact on the historic fabric. The structural loading requirements of residential use are, for instance, considerably less than those required for office, educational or sport/leisure uses.
- 4.13 Any listed building has limitations as a result of their historic fabric and the time period in which they were constructed. In relation to the Mansion House, inclusive DDA compliant access into the building and to each of the floors is very constrained. There are two steps into the building through the front door. Introducing a ramped access into the main historic facade would affect the setting of the historic fabric. The access to the different floors is more readily accommodated within the historic fabric because it is possible to provide a

passenger lift to the mezzanine levels within the Victorian wing or by breaking the space into flats and then accommodating a lift within the west end of the corridor. This is possible because the means of escape can be organised differently than would be necessary to accommodate the large numbers of people escaping offices, large museums and educational facilities, for instance. The residential requirements for smaller stairways and loading capacities than these alternative uses ensures that the historic fabric can be retained *in situ* and used with little alteration to the main corridors and existing staircases.

4.14 Further to this, the possibility of dividing the upper floors into apartments and duplexes off the main corridors means that existing and historic partitions can be reused. There is also the possibility of removing the extra strengthening steels that were previously installed to accommodate office/educational uses in the Mansion House. If further detailed structural works shows that they are still required, then there is also the possibility of introducing them into partitions/non-significant ceilings, utilising the historic layout form wherever possible.

4.15 In addition, residential use of the Mansion House means that individual apartments can take into account the different levels that are restrictive for other uses within the upper floors. Unlike publicly accessible spaces, it is not a requirement for the residential units to provide disabled/level access. Whilst policy requires 10% of new dwellings to be wheelchair adaptable/accessible, this:

- 1 Can be applied flexibly to historic buildings given their constraints, noting that it will be the choice of the future purchaser as to whether they would buy and occupy a dwelling which did not offer level access;
- 2 Given the proposals for Trent Park comprise the Mansion House plus additional residential development, the requirement to provide wheelchair accessible dwellings can be met elsewhere on the site, therefore enabling the sensitive conversion of the Mansion House to accommodate dwellings on different levels/without lift access. Again, it will be the choice of future purchasers as to whether they require a level access dwelling and therefore where they might choose to locate on the site.

4.16 The above has a number of significant advantages as the interventions in the historic fabric of the building can be minimised and layouts can be fitted around the constraints of the historic building, rather than any need to amend the historic building (with impacts on its fabric) to accommodate the new use.

4.17 In relation to servicing and operational requirements, it is also noted that residential use requires minimal amounts of plant space (internal and external) particularly when compared to uses such as educational, hotel and sport/leisure, which is a benefit in the context of a historic building where any alterations, particularly those to the external facades, are very sensitive.

The grounds and public access

- 4.18 By proposing a comprehensive site-wide residential-led use, with the estate freehold owned and managed by Berkeley, the historic landscape can be enhanced and then maintained in the long term, supported by residents (with an associated service charge) who have a vested interest in the landscape quality surrounding their home and are required under their lease to contribute towards this (both financially and by way of maintaining the appearance and character of the site). Public access can be provided to significantly improved parkland at the former campus site, to a level not enjoyed in site's considerable history. This is a significant benefit of the proposed use.
- 4.19 Clearly residential use only within the Mansion House would not provide public access to this historic building, only to its surrounding historic landscape. The three ground floor principal rooms within the Mansion House are significant but are not the most significant in the building. The most significant is the East corner with the history of the alterations during the Bevan period, Sassoon period and the World War 2 period. The Blue Room has the significance of having surviving sketches by Whistler of the drawings on the walls showing the workings out. The Blue Room also has the added significance of being the subject of paintings by Winston Churchill together with some of the Wisteria Walk. The East corner room was Sassoon's bedroom and then became Colonel Kendrick's office during the WWII Prisoner of War years with the staircase to the basement and the listening rooms. The restoration of the historic finishes at ground floor is being undertaken through full paint and wall paper analysis by specialists in their fields, Patrick Baty and Alyson McDermott. Once complete these rooms will need to be maintained and protected as they will form part of the Listed Building Consent/Application. It will be important to ensure the longevity of these finishes as they will add to the understanding of the historic significance of the rooms.
- 4.20 It is therefore considered that residential use within the Mansion House, with public access to these significant rooms through a compatible additional use which would conserve their historic proportions (community facility) would provide what could be considered an 'optimum use' of the heritage asset. The Mansion could be restored and limited physical interventions would be required which would alter the building's significance, but in addition its significance could be enjoyed by the public and its history fully understood.
- 4.21 It is also important to note that the need to control access and divide the space between residential and a community facility could be more easily achieved than is the case with some other mixed uses within the Mansion House. Berkeley would maintain its role as the residential provider with responsibility for the ongoing management of the Mansion House and wider site, with significantly more control over this division than would be the case if a third party operator was involved.

Viability Considerations

- 4.22 Jones Lang LaSalle (JLL) is providing specialist commercial and viability advice to Berkeley to inform this scheme. In relation to residential, its advice is:

The value that can be generated on the basis of a residential use is higher than that of each of the Alternative Uses assessed in this Report. The value differential between residential and retirement use (C2) is not significant; however, given that build costs for residential and retirement schemes are broadly similar, and residential revenue is higher, per square foot, a residential scheme is that best able to meet the capital cost of the restoration required to the site's listed heritage assets, including the Mansion House. Further, the greater efficiency (net to gross ratio) of a residential scheme means that it is more viable than the alternatives considered, and therefore better able to finance the significant capital expenditure required.

On an ongoing basis, a residential-led scheme is considered to be the use best placed to meet the cost of protecting and maintaining the heritage assets, both built and landscaping. Beyond the initial capital cost of restoration, which a residential scheme is best able to meet, a large portion (although perhaps not all) of the ongoing cost of maintaining the heritage assets can be met via residential service charge.

Further, in relation to the need to provide public access to the site, residential use is considered one of the more compatible uses, and does not have the same issues as educational use, given questions of security, and hotel use, where public access is considered to be one of the factors which mean that the site would not ultimately be attractive to a hotel operator.

Residential Transport Considerations

- 4.23 WSP Parsons | Brinkerhoff (WSP) has reviewed the proposed residential land use (based on the scheme at the time of drafting this AUR) with regard to impacts on vehicular trip generation, car parking, cycle parking and pedestrian permeability, as set out in further detail at Appendix 3.

- 4.24 As part of the current residential scheme (at the time of drafting this AUR), it is proposed to provide car parking for 464 cars as a mixture of 411 resident parking spaces (of which 17 will be disabled bays) and 53 visitor parking spaces, meeting London Plan and London Borough of Enfield parking standards. This parking will be sensitively incorporated to each individual property, whether underground, in a private garage or in discrete parking areas. It will therefore be distributed across the development area, minimising its visibility and its impact on the wider site.

- 4.25 WSP has run initial trip generation calculations, as set out in the assessment table at Appendix 3. For the proposed residential use, this results in 184 vehicular trips (two way) in the AM peak (0800 – 0900) and 84 in the PM peak (1700 – 1800), with 1,088 daily (7am – 7pm). This is significantly lower than the trip generation of Middlesex University when it was operational on

site (up until 2012). Their 2005/6 planning application set out that there was an average of 167 vehicles in the AM peak and 240 in the PM peak with a daily average of 3,000 vehicle movements on Snakes Lane. (2,438 trips 7am – 7pm).

- 4.26 When compared to the alternative uses assessed within this AUR the residential use of the Mansion House has a lower traffic generation than all of the alternative uses excluding the care home (where traffic generation comparisons are provided, and where residential is proposed on the remainder of the site).
- 4.27 In addition, it is proposed to operate a shuttle service to reduce vehicular movements to and from the development to link the site into the wider public transport network via the Piccadilly Line and local London bus services at Oakwood station. This will also reduce the number of vehicles exiting Snakes Lane at Bramley Road and alternative uses of the site would not provide this service.
- 4.28 Almost 500 cycle parking spaces will be provided which will be secure for residents, in addition to short term visitor spaces.

Potential Compatible Uses in the Mansion House

- 4.29 As part of the assessment of alternative uses for the Mansion House, LBE has asked us to look at a compatible mix of uses for the Mansion House which might provide enhanced public access.
- 4.30 In relation to residential, we have noted above that the proposals include public access to the Mansion House for the first time through a community facility, which would be located in part of the ground floor and part basement level. We have considered various uses for this including a small museum, café and/or health club as options which might be compatible with a residential use.
- 4.31 In relation to a museum, this would be considered a compatible use with residential subject to it being small-scale/local in character, to ensure it had limited opening hours and did not attract significant visitor numbers with associated coach arrivals, trip generations etc. and associated noise and potential disturbance for residents. It has also been agreed with LB Enfield's highways officer that no parking should be provided for the museum except for disabled parking spaces, three spaces are provisionally proposed. It would also need to be located in a self-contained area of the ground floor to prevent impacts on privacy of residents (such as direct views into ground floor rooms/terraces) and to avoid shared entrances/facilities. In summary, subject to the nature of any proposal and its viability, this use would be considered compatible with residential and would achieve a good level of public access to the Mansion House. The potential for a museum use is considered in further detail in section 8.0 of this report.

4.32 In relation to a sports/leisure use, a small-scale health club in part of the ground floor of the Mansion House (and pool/Orangery) could be compatible with residential use. This could comprise, for instance, a small gym with the use of the outdoor pool and some studio/spa facilities. The issue with this use would be the potential conflict between residents, who would pay a service charge towards this facility, and paying members of the public, who would become a member of this club; this would need to be subject to a management plan. There would also need to be limited opening hours and control over the use of the outdoor pool by non-residents due to its proximity to the house and potential for disturbance. This use has the potential to work well with residential in the Mansion House. However, whilst it would provide public access to the house, the considerable costs in running/ maintaining this type of facility in a listed building(s) would mean the facilities would not be 'open to all' and could be considered 'exclusive' by the public due to likely membership fees. This use is considered further in section 10.0 of this report.

4.33 A final compatible use with residential would be a self-contained café (A3 Use). The key issue with this use would be its viability and the quantum of visitors it would attract. There are two existing cafes in the surrounding Trent Country Park and consideration should be given to the need for another facility. In addition, without a draw to the site such as a museum or health club, it is questionable whether a café could be self-sustaining in this location and generate sufficient revenue to cover both the running costs and the necessary contribution towards the costs of maintaining the listed building. We would therefore suggest that whilst a café would provide public access to part of the house, it may need to be provided as a supporting facility to another residential compatible and viable use i.e. a small museum or health club. We note that if this facility was provided within the health club, it could be 'open to all' (i.e. not just members) and would therefore partially overcome the issue of 'exclusiveness' noted above. This is considered further in later sections of the report.

Summary

4.34 In summary, a residential use within the Mansion House would be suitable in heritage terms and would require minimal interventions in the building's historic fabric. However, residential only would not provide the public access required to the house and therefore an additional compatible use would be needed. This could comprise a museum, café and/or small health club. These considerations have informed the proposals being taken forward by Berkeley.

5.0 **Office / Headquarters / Research & Development**

Summary of Use

- 5.1 The Council's Planning Statement states that the university was an employment generating use. An alternative use, which would bring economic value to the Borough and generate high wage employment, could be headquarter/office/research and development type B1 uses, given the site's high profile location. This use would require additional space in addition to the Mansion House only, and therefore the assessment considers the B1 Use of the Mansion House and additional buildings on site.
- 5.2 Appendix 4 sets out two potential B1 development options for the site which represent the varying scales of office use which could be delivered:
- 1 A small scale office proposal with approximately 29,773sqft B1 floorspace in the Mansion House with an additional building proposed to the west of the house, comprising approximately 17,475sqft of B1 floorspace with a site area of 70,000sqft including car parking with approximately 224 dwellings also proposed on-site, based on emerging masterplan; and,
 - 2 A larger scale office park/ headquarters on site, using a comparable floorspace to the existing, comprising the Mansion House and stables plus an additional 273,000sqft of B1 floorspace on site (total of 314,500sqft GIA) with a site area of 609,000sqft including car parking areas (approximately 64 dwellings also proposed on-site, based on emerging masterplan).

1. Design and Operational Considerations

Historic Building and Conservation Impacts

- 5.3 The area that can be used for offices within the Mansion House has a GEA of 33,339 sq ft. The GIA of the Mansion includes all communal circulation routes and staircases and once restored will be approximately 29,773sq ft, depending on the divisions and requirements for internal walls, lifts and plant facilities.
- 5.4 It is likely that this use will utilise the basement of the Mansion for the majority of the kitchens, servicing offices and stores as well as archival storage and large networking plant room spaces. This will introduce a significant amount of electrical wiring through the historic fabric and is likely to disrupt some of the historic wiring.
- 5.5 Any archival storage requirements will introduce a set of special storage conditions that may require atmospheric controls and tanking/cavity wall drain

systems to ensure that the materials are kept away from the basement conditions.

- 5.6 The ground floor of the house is likely to include main conferencing areas and a cafeteria for staff and visitors. There will also need to be a reception space where visitors are greeted, registered etc. with waiting space. Consideration of DDA at ground floor area will need to be made as the en-filade rooms may be split into individual conference rooms that will prevent circulation through them.
- 5.7 It is also likely that the access to the ground floors by the general public will be restricted due to the security issues related to a business use, including private and confidential paperwork and expensive equipment.
- 5.8 A new disabled access or ramp will need to be incorporated to the main entrance door to overcome the steps into the building, to allow level access to the office reception.
- 5.9 The upper floors of the Mansion House have inherent problems with access and levels and there would not be full DDA access to the B1 floorspace. This is also an issue at ground floor with the main staircase, where the main spine corridor has two steps up and down.
- 5.10 The upper floors have been altered substantially over the years from the raising of the rear principal ceilings in the north facing enfilade rooms by Sassoon to the insertion of large steel beams to increase the possibility of floor loadings. The most substantial floor change is between the Victorian wing and the main floors. This causes an issue with the suitability of the placement of lifts to mezzanine floors/full floors and the requirement to install two lifts for this option would require substantial alterations to the historic fabric. There are also issues of horizontal level circulation from a lift, due to level changes on first and second floors (as well as ground floor). Therefore level access to the upper floors to meet requirements for 'access for all' would be difficult to achieve without significant interventions and the office spaces would not be DDA compliant.
- 5.11 With the change of use come other aspects that require fulfilling and they include the requirement of structural loadings following a change of use. The following documents would need to be adhered to in accordance with Building Regulation A:
- a BRE Digest 366: Structural Appraisal of Existing Buildings, Including for a Material Change of Use, 2012
 - b The Institution of Structural Engineers Technical Publication Appraisal of Existing Structures (third edition), 2010
- 5.12 The likelihood of meeting the building regulations for a code to meet Office B1 would mean that there would need to be more structural loading capacity and acoustic requirements.

Public Access to Three Principal Rooms

- 5.13 The three ground floor principal rooms are significant but are not the most significant in the building. The most significant is the East corner with the history of the alterations during the Bevan period, Sassoon period and the World War 2 period. The Blue Room has the significance of having surviving sketches by Whistler of the drawings on the walls showing the workings out. The Blue Room also has the added significance of being the subject of paintings by Winston Churchill together with the some of the Wisteria Walk. The East corner room was Sassoon's bedroom and then became Kendrick's office during the WWII Prisoner of War years with the staircase to the basement and the listening rooms.
- 5.14 The restoration of the historic finishes at ground floor is being undertaken through full paint and wall paper analysis by specialists in their fields, Patrick Baty and Alyson McDermott. Once complete these rooms will need to be maintained and protected as they will form part of the Listed Building Consent/Application. It will be important to ensure the longevity of these finishes as they will add to the understanding of the historic significance of the rooms. The use of the ground floor of the office space for a cafeteria or meeting rooms may have an impact on the survival of the historic restored finishes and they may require some level of protection from food grease and technology.
- 5.15 The alternative use would not allow public access to the building. Dependent on the operator, there may be potential for open days/private tours, with access to the ground floor and very limited access within the basement due to the significant amount of servicing required with associated security and health and safety issues.
- 5.16 In relation to the opportunities offered to understand and access the heritage value and history of the Mansion House and wider estate, this would be difficult to achieve with an office use given this does not relate to the site or building history and would limit public access to the Mansion House and its surrounding landscape (see section on heritage and landscape impacts below).

Servicing and Operational Requirements

- 5.17 As well as the services required in the basement of the house, further services are likely be required in the Mansion such as potential air conditioning installations, lighting suitable for office use, window glazing, power points including underfloor connections etc.
- 5.18 The servicing of the Mansion and the surrounding office building(s) as a business use would require a high level of service vehicles with increased refuse collections and cleaners, equipment servicing etc. There would also be significantly larger areas of car parking required in large surface car parks for staff and visitors when compared to an alternative residential use. This is considered further under the transport section below.

2. Planning Policy

The Development Plan

- 5.19 The Council's policies in the Core Strategy and DMD direct office floorspace to town centres and the identified growth areas (Upper Lea Valley and Place Shaping Priority Areas) through the town centre first sequential test, which reflects the approach set out in the London Plan (policy 4.7) and NPPF. Core Policy 19 specifically seeks to protect town centres (particularly Enfield Town) as the main locations in the Borough for office development, promoting mixed use development with office uses in town centres or sites within strategic growth areas. This is reiterated under DMD Policy 25.
- 5.20 The supporting text to Core Policy 19 refers to the GLA's London Office Policy Review (2007) which recommends concentrating and encouraging offices in town centres and business parks with the greatest potential for growth, where public transport and access to Central London is already good, and where there is an opportunity to provide good quality office space and reinforce identity through a mix of residential, retail and leisure uses and good quality public realm. In Enfield, Enfield Town and Southgate are identified as the main office locations.
- 5.21 Since the adoption of the Core Strategy, the GLA has published its 2012 London Office Policy Review which concludes that beyond Central and Inner London, and away from Crossrail, town centres are likely to experience increasing problems and the outcome is likely to be a growth in vacant and under-utilised secondary office property in Outer London. As noted under para. 4.1.5, "*there can be little room for doubt that office markets in Outer London, with a small number of exceptions, have been in long-term decline*". Key to success is the access to public transport; areas with the strongest access closely match successful commercial centres.
- 5.22 This is reiterated in Enfield's Employment Land Review (2012) (ELR) which concludes that in relation to office use, "*...Enfield is not however seen to be a major office centre and we would not expect to see any large scale office development. Rather we would expect this demand to be accommodated in a series of small office developments in town centres throughout the borough, concentrated on the existing centres of Enfield Town, Southgate and Innova Park*" (para. 8.11). The report finds that there is no requirement to make specific new land use allocations for offices as the scale of development required can be promoted within the existing Core Strategy policies (and the sites already identified).
- 5.23 Further to this, the Core Strategy references Enfield's Retail and Town Centres' Study (2007), the findings of which (though outdated) are broadly supportive of the GLA's and the more recent ELR i.e. that Enfield Town and Southgate should be promoted as locations for office provision, as part of wider mixed use schemes, and that other centres in the Borough should not be actively promoted for office development.

- 5.24 On the basis of the above policy review, it is clear that the Trent Park site is not suitable in policy terms for office use and there is no need for B1 floorspace in this location. The sequential test would apply and office use will be directed towards the town centres first (particularly Enfield Town and Southgate, as well as Innova Park) followed by the identified growth areas. The evidence base states that other locations should not be actively promoted for office development. In addition, the site has a low PTAL rating and is therefore not easily accessible or well served by public transport; accessibility is noted to be one of the key criteria to creating a successful commercial development.
- 5.25 It is therefore considered that B1 use would not comply with the Development Plan and its supporting evidence base.

Heritage and Landscape Impacts

- 5.26 Aside from the specific impacts on the Mansion House, as addressed under the 'design' section above, there are related impacts which must be considered on the site's wider heritage (built heritage and the landscape).
- 5.27 There are clearly different scales of B1 use development which could occur on site, and the plans at Appendix 3 set out two potential schemes of varying scales. The smaller office scheme (Mansion House plus an additional office building to the west) would sit within the surrounding proposed residential development to the south, east and west. Whilst it may not be essential for this proposal to have a secure boundary, we consider that given the number of different people with access to the site (i.e. residents, members of the public using the Park etc.) and the limited distinction between the public/private realms in the wider landscape, any occupier is likely to want some level of privacy and security to their premises. For example, no occupier would want the terrace surrounding the house open for public access and would likely want to 'demarcate' their land from the wider public realm. It is therefore very likely that a form of fence or related boundary would be required, although we note that a sensitive strategy could be applied to ensure this is acceptable.
- 5.28 This need for a secure boundary applies to the 'office park'/HQ example, but on a much larger scale. Given the likely character and operation of an HQ/office park, there will be a requirement for the site to be fully secured from public access by a fence/perimeter boundary, as is common with these developments. As can be seen from appended plan 5902/SK/127A at Appendix 4, this boundary would enclose a considerable portion of the site (approximately one third).
- 5.29 This requirement for security and enclosure would limit public access to the site with potential impacts on the setting of the listed buildings and historic landscape as follows:
- 1 The purpose of a secure perimeter would be to prevent public access; this would vary in extent depending on the scale of development, but

would in both cases prevent open access to the house and its immediate surroundings. In relation to a larger office park/HQ scheme, this would prevent public access to a significant portion of the site (including the stables and the walled garden). This proposal would have limited public benefits and would not integrate the site into the wider Trent Country Park. Based on the feedback we have had on the importance of leaving the site 'ungated' for public enjoyment, this would also receive limited (if any) support from the local community.

- 2 The introduction of a secure boundary with associated signage would have a detrimental impact on the wider landscape restoration strategy (given part of it would be sectioned off for another use) and potentially the setting of the Mansion House (depending on the character of the boundary material/height etc.). This is a greater issue with the larger office park/HQ than the small scale proposal.
- 3 By sectioning off part of the landscape for a different use, this would have associated impacts on its future management and maintenance due to differing needs and demands, as well as funding streams. This would create complexities when seeking to achieve a comprehensive historic landscape restoration and ongoing maintenance strategy, which is key to the success of this sensitive site.

5.30 In summary, therefore, the impacts on public access and the historic landscape are substantial in relation to the larger office park/HQ schemes, whereas a small-scale office proposal could be sensitively designed and secured to limit impacts on the surrounding landscape and the setting of the Mansion House, with limited restrictions to public access across the wider site.

Green Belt

5.31 In addition to the above impacts on the landscape, the development of office buildings on site at the scale shown for an office park/HQ has the potential to impact on the openness of the Green Belt. Large floorplates are required when planning an office development, to ensure efficiencies of space and to provide the types of multi-desk/meeting room layouts demanded by modern office occupiers. These large and deep floorplates and the limited variation achievable in relation to building heights, widths, depths, roof form and pitch, materials etc. will all have associated visual impacts and will therefore impact on the openness of the Green Belt. In addition, large areas of surface car parking would be required which would have associated impacts on the Green Belt. This would need to be further tested to determine whether this would be acceptable in this location based on detailed design, but the flexibility offered by a varied and articulated residential layout with discrete car parking cannot be achieved by a large scale office scheme.

Social and Economic Impacts

- 5.32 Any proposal for B1 use at the site will have clear benefits in relation to employment generation. This would vary in scale, depending on whether the smaller office proposal or the larger HQ/office park was implemented, but the job creation would be greater than, for example, a residential use. The employment generation potential is therefore a benefit of this alternative use.
- 5.33 We note that this benefit is clearly dependant on finding the appropriate occupier for the buildings, particularly one which is willing to invest in a site with considerable ongoing costs (i.e. listed building(s) and landscape), associated complexities and limitations related to the occupation of heritage assets and poor accessibility to public transport. As set out in the policy review and JLL's assessment of commercial demand for this use, without existing or potential future demand from the market, the potential for success is low and this must be accounted for when considering potential employment generation on site.
- 5.34 In relation to local services, an office use would have limited impacts on schools, doctors, dentists etc. as employees will come to site for the working day and then go home in the evenings/weekends. The majority would choose to register at the facilities near to where they live, rather than those where they work.
- 5.35 In addition, the site has limited easy-access to local services such as cafes/restaurants for lunch breaks etc. and therefore the spending of employees in the immediate locality is likely to be limited, particularly when compared to a residential use.

Transport Impacts

- 5.36 Any potential office development on site would have low accessibility to public transport for employees and visitors (PTAL rating 0). Parking standards would allow for approximately 200 spaces across the site for a large office development (such as an office park or large HQ) however the trip generation indicates there would be 308 and 332 two-way vehicle movements in the AM and PM peak periods respectively. Significant additional areas of car parking would therefore be required to accommodate all employees and visitors on site, dependent on the office size and operational business requirements. If this was not provided overspill parking is likely to occur on the surrounding roads such as Snakes Lane and potentially in the Hockey Club car park. The large areas of car parking required, located between the large building footprints noted above, will also have impacts on the Green Belt and the openness of the site, as cars would be parked on these areas across the day. A shuttle service similar to that for the residential use is likely to be required to help minimise car trips.
- 5.37 As can be seen for both scales of B1 development, they would generate significantly more vehicular movements overall than the residential scheme proposed. This varies from an additional 262 daily trips up to an additional

1,523 movements, which is significant and would have resultant impacts on the highway network.

- 5.38 In addition, a research facility and any occupier/company with specific security requirements, as set out above, would likely sever a number of pedestrian routes across the site due to the security measures required. This would have associated negative impacts on the site's accessibility and permeability, which is a significant disadvantage of any large scale office/HQ/R&D development on site.
- 5.39 The CIHT guidance document 'Guidelines for Providing for Journeys on Foot' suggests that the preferred maximum walking distance is 1.2km for pedestrians without mobility impairments. The Mansion house is located approximately 1.5km from Oakwood Station and 1.65km from Cockfosters Station which exceeds the maximum walk distance.

3. Commercial and Viability Assessment

- 5.40 JLL has explored the London and more specifically the Enfield office markets, as well as the specific attributes of the Mansion House in order to assess its suitability for office use.
- 5.41 Generally the office occupier and investment markets have been healthy throughout 2015 and the start of 2016. Much of the emphasis has been on Central London locations, where rents are high, vacancy rates are low and there is a strong investor appetite. These factors have in turn spurred a strategic relocation of some occupiers to outer London areas. Core locations in the Thames Valley specifically have benefitted from this relocation, with decreased vacancy rates and an increase in rents.
- 5.42 The Enfield office market is not a Core location; nor does it benefit from being located within a technology corridor or a cluster of industry that would incentivise occupiers to locate outside of the more traditional centres. Although office vacancy rates in the submarket of Enfield are low, relative to the wider London area, the rents being achieved do not suggest strong occupier demand. As can be seen from the table below, average achieved rents in the 12 months up to both Q1 2015 and Q1 2016 were less than half of the London market average.
- 5.43 The Enfield office market however has not, so far, benefitted from this relocation trend, although compared to the rest of London office vacancy rates in the submarket of Enfield are low, the rents being achieved do not suggest strong occupier demand. As can be seen from the table below, average achieved rents in the 12 months up to both Q1 2015 and Q1 2016 were less than half of the London market average.

Table 5.1 Average Rents in London and Enfield

OCCUPATIONAL MARKET	ENFIELD		LONDON	
	2016 Q1	2015 Q1	2016 Q1	2015 Q1
Vacancy Rate	0.6%	1%	5.4%	5.7%

Average Achieved rent (psf)	£14.85	£14.21	£53.29	£43.86
Average Asking rent (psf)	£15.96	£13.31	£43.11	£38.60
Leasing Activity (sf)	25,934	60,628	2,579,538	4,675,837

Source: Costar

- 5.44 Throughout 2015 and the start of 2016 the majority of demand has been for circa 1,000 sq ft of office space, with rents peaking at £21 psf. There does not seem to be the demand from a single occupier for larger space, which might serve as a headquarter office.
- 5.45 From an investment point of view, Enfield is lagging quite significantly behind the rest of London in terms of the returns on investment and number of transactions. In the 12 months leading up to Q1 2016 there were no investment deals. The year before this saw one investment deal of £2.1m at 8.8% NIY.
- 5.46 Since 2010 the number of investment deals per annum has been either zero or one and there are no office developments in the pipeline, which suggests that office investments in Enfield aren't offering an attractive level of return. The conversion of the Mansion House into office space has to be considered in the context of likely liquidity being low, with no real evidence of high investor demand. The cost of conversion to office use is addressed further at section 5.52.
- 5.47 The requirements of office occupiers can differ greatly, but a number of key needs determine value. The location of the property is most important; the right location driving occupier demand, with the emphasis being on the connectivity of that location. The Mansion House has only moderate connectivity required for office use, with both Hadley Wood Railway Station and Cockfosters underground station within a 20 minute walk or five minute drive. Heathrow Airport is within a 40 minute drive.
- 5.48 Whilst the Mansion House might present as a grand, opulent location for a company's headquarters, demand in this use class is likely to be limited due to the connectivity constraints combined with the lack of local amenities and the fact that Enfield does not have a reputation as a developed, desirable office location.
- 5.49 In light of the above, JLL does not consider that the site could be used to its full potential under this use. Rental income in this location is unlikely to be strong, and with no forecasts for growth in the Enfield area it is unlikely that an office redevelopment would be considered sufficiently viable for speculative redevelopment. In addition, the need for the site to remain accessible to the local community would provide an obstacle for office occupiers.
- 5.50 Another possibility in this context is for an R&D occupier. There has been a significant growth in R&D requirements in recent years, as tech occupiers and start-ups look to expand into bigger space. The requirement for these kinds of companies is mostly in areas that offer accessibility to railway links,

cycle facilities and local amenities. Cambridge has seen significant activity from R&D occupiers in recent years, with a recent flurry of take up of lots sizes of 10,000 sq ft. However, this take-up is driven both by university links and the growth of clusters technology and science business, neither of which would apply in Enfield.

5.51 Although the size of the estate, the Mansion House and its surroundings would have provided an ideal site for R&D occupiers, the location, and specifically the lack of amenities and good transport connections would significantly dampen demand. Even on the basis that a willing occupier was identified, JLL does not believe that this would be the most profitable use of the property.

5.52 In order to convert the Mansion House from its current use to an average, air conditioned office building of 3-5 storeys the BCIS quotes £891 psm. JLL considers this an under-estimate for this type of property, and this cost does not reflect any additional costs to deal with the challenges of the building being Grade II listed. The conversion costs, in reality, are likely to be significantly higher.

5.53 We have not undertaken a viability appraisal for this use as there is limited connectivity, the rental income is not likely to be strong and there are no forecasts for growth in the area. Importantly, it is likely that the significant cost of converting the Mansion House to office use would further deter potential occupiers. Finally, the fact that the site needs to remain accessible to the local community, does present a conflict with office/R&D use and we feel that on the basis of the foregoing analysis there would be little to no demand for this use. This is consistent with the marketing of the site in 2012 and 2015.

Summary

5.54 In summary, the following applies to a B1 use of the Mansion House:

- 1 Restricted DDA access to the Mansion House
- 2 Restricted access for the public to the House and part(s) of the landscape due to issues of security and management
- 3 Impacts of conversion on the historic building fabric and high servicing requirements
- 4 Sequential test and inappropriate location for this use in planning policy terms
- 5 Impacts on the historic landscape and demarcation of different uses (with differing management)
- 6 Green Belt impacts due to the nature of the new buildings and associated car parking
- 7 Issues of accessibility, traffic generation and parking
- 8 Economic benefits with potential for job creation; however, lack of demand from the market

Potentially Compatible Mix of Uses

- 5.55 This section provides a secondary qualitative assessment of the potential compatible uses which could be accommodated within the Mansion House, alongside the main B1 use. However, we note that given the above policy and commercial/viability issues associated with B1 uses, it is unlikely that even with an ancillary use it would be considered an appropriate alternative to residential.

Hotel

- 5.56 A hotel could be an appropriate and compatible use with B1 office/R&D uses, given the potential need for visitors/oversees employees to stay on site for a short period of time. Office parks and company HQs are often accompanied by a hotel to cater for short-stay business trips.
- 5.57 However, this assessment is considering a compatible mix of uses (i.e. B1 and hotel) which could be accommodated within the Mansion House itself, rather than in separate buildings on site, to provide public access and reduced alterations to the historic fabric. In this case, it is not considered that any operator would want to co-locate offices and a hotel within the house given space and layout restrictions. In addition, it is not considered that this would either enhance public access to the Mansion (given the nature of guests the hotel would be targeting), nor would it reduce the amount of intervention needed in the historic building fabric. Any requirement for separate reception spaces, servicing requirements etc. would require further interventions, and additional vehicle movements would also result from servicing requirements and guest movements.
- 5.58 It is therefore not considered that office and hotel uses would be an appropriate compatible mix within the Mansion House.

Sport/Leisure

- 5.59 It is unlikely that a sport/leisure facility would co-locate with a B1 use within the Mansion House unless the swimming pool and orangery were also brought into this operation. In this case, the eastern portion of the ground floor of the Mansion House, the swimming pool and the orangery could provide gym, studio, changing room and shower facilities focused around the pool. This could be run alongside the office use as a facility for staff, along with potential membership options for the public. However, if this was run by the business operator it is likely they would want exclusive use for their staff, whilst a third party leisure club operator would be unlikely to take on a small facility such as this to run alongside a business use in the Mansion House (given the limited membership numbers and therefore limited returns).
- 5.60 Whilst a leisure/sport use could be compatible with B1 uses, it would likely be operated by the main business occupier and would be exclusive to the staff, in which case it would not work to improve public access to the building. If it was a sports club with membership options, it would need to be small scale in

nature given the constraints of sharing the house with a B1 user, with a limited number of members and likely an 'exclusivity' that would be unaffordable for many locals. It's unlikely that the latter would be taken up by an operator.

Café

5.61

A café would work well and is considered compatible with a B1 use. This could be a facility for staff use, as well as access to the wider public. The key consideration would be whether this use would be operated by the B1 occupier, or whether a third party would be brought in, and the associated access, servicing and operational requirements to ensure these did not conflict.

6.0 Hotel

Summary of Use

- 6.1 An alternative use for the Mansion House (and potentially the swimming pool/orangery) could also be for a hotel with spa and some conferencing facilities (Use Class C1). The Council's Planning Statement refers to the site's potential to attract high quality leisure and recreation uses which would take advantage of the site's location within the Country Park, along with its heritage assets. The Planning Statement suggests this could include "...*hotel, spa and retreat type ventures with some conferencing that aims to capture the value of heritage and landscape*" (pg.8). The use of the Mansion House within Use Class C1 is considered further below.
- 6.2 Appendix 4 provides drawings prepared by Giles Quarme & Associates which show how the ground floor/basement of the Mansion House could accommodate a hotel use, with details on the restrictions of the upper levels in relation to conversion of the building for various uses including a hotel. A hotel within the Mansion only could provide approximately 29,773sqft of floorspace, whilst an additional building to the west of the house could provide an additional 9,500sqft of floorspace (likely required as a minimum to make this a viable option). The Mansion House only scheme would maintain 229 dwellings on the remaining site, whilst the house plus the additional building to the west would reduce the number of dwellings to 224.

1. Design and Operational Considerations

Historic Building and Conservation Impacts

- 6.3 In relation to the building's history, whilst it was used as a prominent 'London weekender' during the 1920s and 30s, it has no history of hotel use (Class C1). To accommodate this use, the number of bathrooms, servicing and access arrangements, loading and sound insulation that will need to be introduced into the historic fabric will be far greater than if the building is re-used as its historic use intended, i.e. private residential.
- 6.4 As shown in the plans at Appendix 5, a hotel use within the Mansion House utilises the basement for the majority of the kitchens, offices and stores as well as the laundry storage. In addition, the ground floor has been divided into the areas required for a functioning hotel, including restaurant/breakfast room and bar. A new disabled access or ramp would also need to be incorporated to the main entrance door to overcome the steps into the building, to provide DDA access. This is also an issue at ground floor with the main staircase, where the main spine corridor has two steps up and down.
- 6.5 Further to this, the upper floors have inherent problems with access and levels. They have been altered substantially over the years from the raising of the rear principal ceilings in the north facing enfilade rooms by Sassoon to

the insertion of large steel beams to increase the possibility of floor loadings. The most substantial floor change is between the Victorian wing and the main floors. This causes an issue with the suitability of the placement of lifts to mezzanine floors/full floors and the requirement to install two lifts and a dumbwaiter (likely required) for this option would be substantial.

- 6.6 With the change of use come other aspects that require fulfilling and they include the requirement of structural loadings following a change of use. The following documents would need to be adhered to in accordance with Building Regulation A:
- a BRE Digest 366: Structural Appraisal of Existing Buildings, Including for a Material Change of Use, 2012
 - b The Institution of Structural Engineers Technical Publication Appraisal of Existing Structures (third edition), 2010
- 6.7 The likelihood of meeting the building regulations to meet Hotel use requirements would mean that there would need to be more structural loading capacity and acoustic requirements.

Public Access

- 6.8 The three ground floor principal rooms are significant but are not the most significant in the building. The most significant is the East corner with the history of the alterations during the Bevan period, Sassoon period and the World War 2 period. The Blue Room has the significance of having surviving sketches by Whistler of the drawings on the walls showing the workings out. The Blue Room also has the added significance of being the subject of paintings by Winston Churchill together with the some of the Wisteria Walk. The East corner room was Sassoon's bedroom and then became Kendrick's office during the WWII Prisoner of War years with the staircase to the basement and the listening rooms.
- 6.9 The restoration of the historic finishes at ground floor is being undertaken through full paint and wall paper analysis by specialists in their fields, Patrick Baty and Alyson McDermott. Once complete these rooms will need to be maintained and protected as they will form part of the Listed Building Consent/Application. It will be important to ensure the longevity of these finishes as they will add to the understanding of the historic significance of the rooms. The use of the ground floor with restaurants, dining spaces and bars may require some level of protection from food grease and damage of the historic finishes.
- 6.10 The alternative use would reduce the scope for public access within the basement as the amount of servicing is only just allocated within the basement and this would result in security and health and safety issue associated with allowing the public into the basement to view the World War Two listening rooms.

- 6.11 Ground floor accessibility might be reduced on a continual basis (due to use of the principal rooms by the hotel for weddings, conferencing, private dining, etc.) but parts of the ground floor could be open to the public. For example, the restaurant/cafe could take bookings for non-hotel guests and could provide afternoon tea facilities as well as more formal dining. However, if an operator took on the Mansion House plus an additional building to the west, they may choose to locate all or some of the dining/event space in the new-build element.
- 6.12 The access to the immediate surrounding gardens and terrace would be at the discretion of the hotel operator. It is likely that some security would be required to demarcate the hotel from the surrounding parkland which would be open to the public, and planting/fencing may be considered necessary to prevent open access.
- 6.13 In relation to the opportunities offered to understand and access the heritage value and history of the Mansion House and wider estate, this could be achieved to a certain extent with a hotel use given the history of the house relates to overnight stays, dining and country pursuits, and the use would permit public access to the house and its surrounding landscape. This would of course be limited to those staying in the hotel and would be subject to the requirements of the operator in relation to room layouts and uses, as well as their approach to allowing non-hotel guests to access the building.

Servicing and Operational Requirements

- 6.14 The servicing of the Mansion House as a hotel would require a much higher level of service vehicles than residential use, as well as additional refuse collections, laundry collections and more car parking facilities (both for staff and guests) in close proximity to the Mansion. This is considered further under 'transport impacts' below.
- 6.15 As noted, there would also be a requirement for two lifts; one for guests and one service lift. This would require substantial interventions in the historic fabric and level changes (horizontal and vertical).

2. Planning Policy

- 6.16 The London Plan, Core Strategy (Policy 12 & 17) and Development Management Document (DMD 31) require the application of the town centre first sequential approach to hotel proposals, as well as an impact assessment (schemes over 2,500sqm). Council policy also references locations as being suitable for hotel uses where they have good public transport connections to central London and/or international termini; or where there is a large trip generating tourist attraction; or in the Upper Lee Valley area.
- 6.17 The proposal for a hotel at the Trent Park site therefore conflicts with the above policy, as it is not within or on the edge of a town centre, it has a very low PTAL rating of 0 (with low public transport accessibility), it is not located at a large tourist attraction and it does not fall within the Lee Valley.

- 6.18 Notwithstanding this, we note that a 'country house hotel' model is based, by its very nature, on an out-of-centre location and the proposed use should not simply be discounted on this basis. Consideration needs to be given to need and impact and we note that in this regard there are other large country hotels in the area, including the West Lodge Park Hotel in close proximity to the site. This is addressed further under the 'Commercial and Viability Assessment' section below. A full assessment would need to be undertaken based on the proposed size of the hotel in this locality.
- 6.19 Even if a hotel were to co-locate with a museum in the Mansion House (see section on compatible uses below) to seek to comply with planning policy for hotels to be suitably located '*where there is a large trip generating tourist attraction*', this would not be advisable at this site as it is not suitable for a use which generates large trip numbers (see section 8 of this report for museum uses). Any 'museum' located within the Mansion House would need to be small scale and more local in its nature, and therefore this policy issue would not be overcome.

Heritage and Landscape Impacts

- 6.20 Aside from the specific impacts on the Mansion House, as addressed under the 'design' section above, there are other wider heritage and landscape impacts which must be considered.
- 6.21 The use of the Mansion House, and potentially an additional building to the west, will have limited impacts on the wider site. The use would be well contained and would be suitable within this historic landscape. The main conflict which could arise would be if the hotel operator required some of the surrounding landscape to be included within its demise to host weddings and other events, which would need to be separated from the remaining public parts of the site. For example, they may require an area of the parkland to the north (rear) of the house or part of the daffodil lawn for marquees etc. Any segregation in these sensitive locations is unlikely to be acceptable in historic landscape terms and would also limit public access. The lack of these facilities is likely to limit interest from the hotel sector (as addressed below).

Green Belt

- 6.22 The Green Belt consideration relevant to this use relates to car parking requirements. Clearly a hotel of 100 bedrooms, with the potential for non-hotel guests to use the dining facilities and/or spa facilities, would generate the need for significant car parking area(s) which would need to be in fairly close proximity to the house; a part of the site which sits within a very sensitive landscape setting which requires restoration. The approach to car parking would require careful and sensitive consideration as the need would be much greater than for residential use and has the potential to impact on the openness of the Green Belt.

Social and Economic Impacts

- 6.23 A hotel use would generate a small number of jobs at this location along with the potential for spin-off expenditure in the local area given guests may visit local attractions (such as Go Ape and the golf course) and make use of facilities such as local cafes/restaurants. There would be very limited impacts on local facilities such as doctors/dentists/schools (emergency only, other than for staff).

Transport Impacts

- 6.1 Hotel guests are very likely to arrive by car or taxi given the site's low accessibility by public transport. WSP's assessment at Appendix 3 identifies that there would be 55 and 44 two-way vehicle movements expected in the AM and PM peaks respectively, which would clearly vary depending on the site of the hotel and whether it caters to external guests (i.e. a spa or restaurant facility which were open to non-residents). Overall, it is anticipated that there would be an additional 653 trips per day generated by a hotel use with residential on the wider site when compared to a residential only use.
- 6.2 Car parking areas would also be required adjacent to the Mansion House as well as a drop off areas to accommodate taxis. Coach parking is also required depending on the number of bedrooms; parking standards would require one coach space per 50 bedrooms and so it is likely that at least two coach spaces would be required. The parking required for a hotel of at least 100 bedrooms plus external visitors (to spa and/or restaurant) has the potential to impact on the surrounding heritage assets but also on the Green Belt and its parkland setting. The hotel hours of operation are likely to be significantly longer than other uses as some guests may arrive in early mornings or late at night.

3. Commercial and Viability Assessment

- 6.3 Luxury country house hotels within the South East and East regions of England are generally located within the Home Counties, Bedfordshire and Hampshire. JLL have researched the five star luxury hotel retreat market within a 100 mile radius of Central London and of these only one, Hilton Syon Park, is located within the Greater London region. Generally such retreats are located in expansive park land (in settings of over 100 acres) providing a quiet or secluded place in which residents can rest and relax. However, in addition to the immediate surroundings, the location is considered an important factor for potential customers, and Trent Park's situation, within the Greater London area and away from the traditional Home Counties locations associated with such retreats, is considered to be a limiting factor on demand.
- 6.4 Normally these hotels average 100 bedrooms and rely on a high suite ratio of 33 - 50%. Typically standard bedrooms start at 30sqm with suites starting at 45sqm and they will normally provide at least one suite well over 100sqm.

The size of these room requirements will have an impact on the historic fabric and the likelihood of this being achievable within the mansion is very low.

- 6.5 Luxury country house hotels usually have a number of different food & beverage outlets. Typically the main restaurant is located within the main house (which is often listed) on the ground floor so it can also be accessed by non-residents. The main restaurant will normally have received accolades such as a Michelin Star and AA Red Rosettes. These hotels will typically have a second restaurant or bistro which is at a lower price point and more often than not the spa will also have its own café or restaurant. In addition there will also be areas for lounges or bars.
- 6.6 Luxury country house hotels will generally also provide meetings and events space which is used by corporates and also for weddings and other celebrations. The number of rooms tends to vary between three and 20 and typically the hotel will have a main function room or ballroom which is over 250 sqm.
- 6.7 Spa facilities will usually include a swimming pool/s, several treatment rooms (including double treatment rooms), sauna, hot tubs, steam rooms, nail bar, hairdressers, relaxation studios, fitness studio and gymnasium. As well as hotel residents, the hotel spa will normally have spa members of people who live in the locality of the hotel.
- 6.8 Key demand drivers of country house hotels in the South East and East are leisure, with the majority of guests travelling from Greater London. JLL's research shows that luxury country house hotels in the South East and East of England are on average 45 miles from the City of London with a travel time of circa 90 minutes.
- 6.9 The corporate sector is also a key demand driver, especially since the improvement of the UK economy, with more companies looking at incentive packages and team building events at these types of retreat hotels.
- 6.10 The Mansion House and an additional building together could be capable of providing up to 100 bedrooms, depending on room configurations which fits the general size of luxury country house retreats in the South East and East of England. However, there could be limited space to provide sufficient food & beverage outlets, meeting and conference facilities and spa.
- 6.11 Being located only 15 miles from the City of London and within Greater London may restrict demand from Greater London, which is a key driver for many country house hotels in the South East and East of England which are popular with London residents for a weekend escape or team building events for London based companies.
- 6.12 The listed nature of the mansion will restrict the configuration of the bedrooms and the lack of level access to the different room sizes/configurations will limit their appeal to the range of guests required to support this use. This is likely to restrict the ability to offer an optimum

bedroom mix, with a suite ratio of 33 – 50% and with suites ranging from 45sqm to over 100sqm.

- 6.13 In terms of local supply, there are 6 hotels providing approximately 565 rooms within a 5km radius of Trent Park that would be considered mid to upscale products. The West Lodge Hotel (59 rooms) and Royal Chase Hotel (92 rooms) are the closest hotels, both offering a country house style product that caters for the local demand drivers such as weddings, conferences and events as well as a good quality dining experience in their restaurants that would attract external trade. Other hotels in the immediate area are mainly bed and breakfast style products with less than 50 rooms.
- 6.14 The other hotel of note is Theobalds Park (141 rooms) in Cheshunt which is operated by De Vere Venues. As this is a De Vere Venue it caters for corporate demand with key accounts from the UK driving the business. Theobalds Park is located outside the M25 and therefore offers easier access to corporate clients coming from outside London, making the offering attractive to businesses using the hotel for away days. JLL considers that the location of Trent Park would inhibit certain corporate clients unless the hotel is aligned with a good quality operator that would cater for this style of retreat product. Without this, it could have a significant impact on demand by such businesses and thus a reduced mid-week income.
- 6.15 Given the location of Trent Park, it is anticipated that the likely demand would come from the local market, with further demand potentially coming from those who work in Central London looking for a nearby retreat that is easily accessible. While some level of demand of this nature can be established, it is likely that that the high capital cost of developing a luxury hotel in the listed Mansion House is not likely to be justified by the potential income, given that this is not an established location for retreat hotels.
- 6.16 Further, and given the existing supply, it is likely that any new entrant would have to differentiate itself in order to compete with the established offering, which would place a further capital cost burden on any developer.
- 6.17 On the basis of the preceding analysis, JLL does not consider that a viability study is necessary for hotel use. This is principally due to locational factors; typically retreat hotels with conference facilities are located further outside of London, in secluded rural settings which are accessible by corporate clients for away days. However, another key factor limiting likely demand for a hotel redevelopment on the site is the high capital cost associated with conversion of the Mansion House for hotel use, which is likely to deter potential hotel occupiers, alongside the listed building status, and the limitations that this is likely to place on internal reconfiguration. Given that Enfield is not an established retreat hotel location, and that the costs of converting the heritage buildings for hotel use are significant, JLL considers that the appetite for hotel use is likely to be limited.

Summary

- 1 Restricted DDA access to the Mansion House for guests
- 2 Impacts on the historic building fabric and high servicing requirements
- 3 Sequential test and inappropriate location for this use in planning policy terms
- 4 Market demand low given location
- 5 Limited impacts on the surround heritage assets, including the landscape, and the Green Belt (subject to parking strategy)
- 6 Issues of accessibility, traffic generation and car parking
- 7 Economic benefits with potential for job creation and spin-off spending

Potentially Compatible Mix of Uses

- 6.18 This section provides a secondary qualitative assessment of the potential compatible uses which could be accommodated within the Mansion House, alongside the main C1 hotel use.

Museum

- 6.19 In relation to the requirement for public access to the Mansion House, we are aware that the majority of the local community is keen for this to be a museum/community space. JLL considers that a high quality hotel, particularly with spa and conference facilities, would not be well-suited to sit alongside a museum use, since these hotels are supposed to offer quiet or seclusion where hotel residents can rest and relax. This may not be plausible when there are visitors to the public community space and the two uses may conflict.
- 6.20 In addition, the layout of the hotel would be compromised to allow the public community space. In general the ground floors of country houses are used for food & beverage outlets and lounges to relax in. There may not be sufficient space to accommodate this if there is a museum or equivalent public community space on the ground floor, particularly if these are located in any of the principal rooms.
- 6.21 To summarise, a museum co-located with a high end hotel use with conference or spa facilities would not be suitable for the Mansion House, as the shared use of the main hotel building with public community space would provide a clear conflict with the use of the building as a hotel retreat, and would also provide a competing requirement for space within the main ground floor rooms.
- 6.22 In addition, the requirement for the building to be open to the public, providing access to the museum, would limit the demand from hotel operators who are likely to be deterred by this arrangement.

Sport/Leisure

- 6.23 Beyond the use of the Mansion House, it is highly likely that any hotel operator would want to include the swimming pool and orangery in its demise to provide spa (leisure) facilities for its guests. This would be an appropriate use of these buildings in the landscape and would be historically appropriate.
- 6.24 A leisure use would work well with the provision of hotel rooms, as it provides an additional facility for guests which would attract them to this country house 'retreat' location.
- 6.25 We note that a number of these high-end spa hotels offer the spa facilities to non-hotel guests on day 'spa-package' deals which might include a meal in the hotel's restaurant/café. This could also be offered here, as could spa membership options for the local community. However, we note that both of these options would likely be at a significant cost which may be prohibitive to some locals. The community is unlikely to consider that this would provide 'access for all' to the house and it would not allow for a full appreciation of the site's history given the limited areas which would be accessible to these guests. It could also be considered to exclude a section of the community who have no interest in the use of a spa.
- 6.26 Whilst this use would be compatible with a hotel and would be suitable in this context, it may not provide the full community access for all and appreciation of the site's history that is required in this location.

Café

- 6.27 As noted earlier in this section of the report, the hotel's café/restaurant could be open to non-hotel guests, which is common with these types of hotels. These uses would be highly compatible and would work well together within the Mansion House. The level of access this would provide and to which rooms would depend on the final food/beverage provision and its layout, but this may allow access to the principle rooms (although not to the basement).

7.0 Retirement Home / Older Care Accommodation

Summary of Use

- 7.1 The Council's Planning Statement refers to 'specialist housing models' classed as 'residential institutions' (Use Class C2). This would include retirement homes/care homes/nursing homes. The conversion of the Mansion House to accommodate these C2 uses is considered further below.
- 7.2 Appendix 6 sets out the following possible options for the site:
- 1 A retirement home could be provided in the Mansion House, and the potential ground floor/basement layouts are shown at Appendix 6 with the restrictions of the upper levels of the house to accommodate this use (noting this would maintain approximately 229 dwellings on the remaining site); and
 - 2 To make this a viable option (as the above provides very limited floor area) a layout plan is included at Appendix 6 which shows retirement home/older care accommodation in the Mansion House plus additional floorspace (the Stables and new build within the walled garden, but this could equally be the Mansion, new build to the west and the stables or walled garden). This would likely include the swimming pool and orangery to provide the residents with leisure facilities. We understand the requirement by potential operators is for a minimum of 70,000sqft of C2 floorspace. In this instance, approximately 180 C2 Use dwellings could be provided on the remaining site.

1. Design and Operational Considerations

Historic Building and Conservation Impacts

- 7.3 The area that can be used within the Mansion House once restored has a GEA of 33,339 sq ft. The GIA of the mansion includes all communal circulation routes and staircases and once restored will be approximately 29,773 sq ft, depending on the divisions and requirements for internal walls, lifts and plant facilities.
- 7.4 As shown on the plans at Appendix 6, this use utilises the Mansion House basement for the majority of the kitchens, offices and stores as well as the laundry storage. The ground floor has been divided into the areas required for a functioning retirement home, including restaurant/breakfast room and bar. The upper floors have inherent problems with access and levels, which is particularly important for this use, particularly where care is provided and residents may have limited mobility. With retirement homes, whilst care is not necessarily offered, residents would view this as their 'final' home and even if mobility is not an issue on purchase, they would want the flexibility to stay in

this location for the rest of their lives with the associated ability for easy-access. Principal access is also an issue at ground floor with the main staircase, where the main spine corridor has two steps up and down. A new disabled access or ramp would also need to be incorporated to the main entrance door to overcome the steps into the building, which would require sensitive design as part of the listed front facade.

- 7.5 The upper floors have been altered substantially over the years from the raising of the rear principal ceilings in the north facing enfilade rooms by Sassoon to the insertion of large steel beams to increase the possibility of floor loadings. The most substantial floor change is between the Victorian wing and the main floors. This causes an issue with the suitability of the placement of lifts to mezzanine floors/full floors and the ability to provide horizontal level access from any lift to each floor of the building. There is also likely to be a requirement to install two lifts (one for residents and one for servicing) and a potential dumbwaiter for this option, with potential impacts on the historic fabric.
- 7.6 With the change of use come other aspects that require fulfilling and they include the requirement of structural loadings following a change of use. The following documents would need to be adhered to in accordance with Building Regulation A:
- a BRE Digest 366: Structural Appraisal of Existing Buildings, Including for a Material Change of Use, 2012
 - b The Institution of Structural Engineers Technical Publication Appraisal of Existing Structures (third edition), 2010
- 7.7 The number of bathrooms, servicing, access, loading and sound insulation that may need to be introduced into the historic fabric for a C2 use is likely to be increased for the retirement home option (as opposed to residential) and this would have resultant impacts on the historic fabric.

Public Access

- 7.8 A retirement/care home would have many limitations in relation to providing public access to the house, similar to a residential use. Whilst the home could provide communal facilities on the ground floor such as a sitting room/café/restaurant, this would be for the use of residents. There may be issues related to the security and safety of the care/retirement home residents in allowing open public access to these spaces, as well as conflicts with their atmosphere which should be quiet and restful. However, it may be possible to have open days/tours of the ground floor rooms and potentially the basement, noting that given the amount of servicing required there will likely to be security and health and safety issues associated with allowing the public into the basement to view the World War Two rooms. The amount of access required and levels of security would depend on the operator and the type of establishment. For example, a home for the Elderly Mentally Infirm (EMI) would need to be secured to ensure residents could not leave without

being accompanied, which would conflict with public access to the house which would need to be carefully controlled.

- 7.9 The access to any landscaped gardens which form part of the retirement home/care home complex (whether that is the Mansion House only or the house plus additional buildings) and the terrace surrounding the house would be at the discretion of the retirement home operator but it is likely that this would be private for the majority of the time with some potential for open days or tours.
- 7.10 In addition, if the retirement home development was located within the walled garden, access to this part of the site would be limited to the public due to the necessity to maintain a secure perimeter (subject to the type of occupier i.e. this being a care home rather than 'elderly accommodation' which is more similar to a C3 residential use). If this were the case, this would limit access into the Wisteria Walk as the southern access point is located from the Walled Garden.

Servicing and Operational Requirements

- 7.11 The servicing of the Mansion House in C2 Use would generate a high level of service vehicles including laundry collections and C2 uses have ancillary facilities such as additional service accommodation and staff facilities. Car parking facilities for staff and guests would also be required.
- 7.12 The remoteness of the site would mean that additional parking would be required for staff. This could have a negative impact on the setting of both the use as a retirement village but also on the setting of the wider Park. Parking and transport issues are addressed further below.

2. Planning Policy

- 7.13 The Council's Development Management Document Policy DMD 15 sets out that specialist housing is only permitted subject to specific criteria.
- 7.14 Part a) of this policy states that this type of development must meet an identified need having regard to evidence in the Council's Market Statement, Health and Adult Social Care Commissioning Strategies, or the needs assessment of a recognised public health care body. We have reviewed the SHMA 2010 (published 2011) for North London which states that the retirement age population in this area is set to increase by between 7% and 19% by 2026 and the population aged 85+ yrs is set to increase by 18% over the same period, with associated housing and health care impacts. It also notes that:

“While it would be extremely useful, it is very difficult to estimate the level of designated housing provision for older persons (e.g. sheltered housing with low level support, sheltered housing plus and extra care) as there is little previous work in this area. It is clear that planning for the provision of these types of accommodation is considered vital by all boroughs who all expect a significant increase in older persons in the future” (para. 7.44).

7.15 As set out under the supporting text to DMD15 (para. 4.6.4) there is a need to expand the supply of specialist housing for some groups but not others, with a lack of requirement for additional capacity in the residential care market over the next 5 years, unless it meets a need for a more specialised form of provision identified in the Market Statement.

7.16 In addition, Enfield's 'Older People with Complex Needs' document (2013) highlights that *“a large number of older people fund their care privately, and this, together with the large numbers of NHS-funded and residents from outside of the Borough, means Enfield care home occupancy rates are 93%”* (pg. 2).

7.17 The evidence base therefore suggests that there is a need in the Borough for various types of C2 uses and therefore there would be a policy case to make for these uses subject to the other criteria of policy DMD 15 being met.

7.18 Part e) of DMD15 requires that specialist housing development is adaptable, well designed, of a high quality, accessible (internally and externally), meets the needs of the specific client groups it serves and their carers but is flexible in case these change. This approach is clearly more difficult to accommodate in full within a listed building such as the Mansion House and is more easily addressed in a new-build scheme (such as within the walled garden). As set out under the design considerations above, the Mansion House has significant issues of level access (horizontal and vertical) and even with lift installation there are issues on each floor as shown in the plans at Appendix 5. The first and second floors have various level changes along the central corridor and level access from the lift to the eastern section of the building is prevented. In addition, no duplexes (or apartments with any internal steps) can be provided for this use and therefore the ability to use the second/attic floor accommodation is very limited. Further to the DDA level access restrictions, there are also restrictions of this listed building in providing the flexibility set out under policy DMD15, as any layouts and access etc. will be very restricted by the historic fabric. In summary, therefore, high quality accommodation would be provided but the use of the house may not be optimised with some spaces being 'unusable'. In addition, we note that the house could be much better suited to C2 uses such as sheltered/elderly accommodation with limited care support, but not perhaps to extra care/care homes.

7.19 Part f) of DMD15 also requires that these types of specialist housing developments are well located so they are *“...easily accessible to existing local community facilities, infrastructure and services, such as public transport, health services, retail centres, recreation and leisure opportunities”*.

As set out for other uses, this site has poor accessibility to public transport (PTAL of 0). However, a C2 use (other than extra-care where residents are unlikely to be able to use public transport), similar to C3 residential, could support the provision of a resident's shuttle bus which could take elderly residents to the bottom of Snakes Lane for the bus/tube. In addition, sheltered housing/low-level care facilities often offer a weekly/bi-weekly shuttle bus to a local supermarket(s) or retail centre to enable residents to undertake their shopping. Therefore these are issues which could be overcome given the nature of the proposal. This will also depend on the facilities provided on site as part of the retirement/care home i.e. they may be fully catered and have on-site nursing and therefore their requirement to access local facilities is limited. Finally, in relation to recreation and leisure, this site is clearly very well located for that purpose, within Trent Country Park and adjacent to the golf course and other facilities.

- 7.20 Therefore, in policy terms, the site itself could be a suitable location for C2 uses subject to the exact nature of the provision. However, the Mansion House itself is unlikely to provide the DDA accessibility and flexibility to meet the needs of extra-care provision. It is more likely to be able to accommodate sheltered housing with low levels of care required (again, noting this is subject to the specific requirements of a private operator). In this case, the proposal would be very similar to C3 residential use with the requirement for some additional communal facilities and additional accessibility requirements (which will likely have additional impacts on the building's historic fabric, as with a standard residential use accessibility is a 'choice' for a market buyer and is not expected as it may be with sheltered/'over 55s' housing).

Heritage and Landscape Impacts

- 7.21 It is not considered that, subject to a high quality and sensitive design, a C2 use would have any adverse impacts on the wider site's heritage assets or historic landscape. The use would be very similar to C3 residential, with the only differences relating to the facilities required and the internal arrangements to the Mansion House, along with some additional DDA access and parking requirements.
- 7.22 The key issue with this use is how the Mansion House might be connected to the retirement/care home accommodation at the stables/walled garden (i.e. other buildings on site) but it is not considered that the entirety of the demise would need to be secured/separated from the wider site with associated public access restrictions.
- 7.23 Notwithstanding this, secure garden spaces would likely be required for the enjoyment of residents (many of whom will require supervision/care) and therefore there is potential for the Mansion House terrace and the walled garden, for example, to be secured to prevent patients leaving these spaces (particularly those whose mental health is affected). This could have some impacts on the public's access to the landscape and key heritage assets,

particularly as the walled garden provides a key access point to Wisteria Walk. However, with careful and sensitive design this could be overcome.

- 7.24 It is considered that the C2 use could fit well within the landscape and would be a 'quiet' use suited to the parkland setting, with the ability to contribute to the maintenance and ongoing conservation of the site. It is therefore concluded that there are no significant heritage/landscape issues related to the wider site above those which would need to be addressed as part of a residential use and which cannot be overcome by careful design. It is therefore the internal arrangements and accessibility within the Mansion House which is the key consideration for this use.

Green Belt

- 7.25 Any Green Belt issues can be addressed in a similar way to the residential proposals and it is not considered that there will be any unacceptable impacts.

Social and Economic Impacts

- 7.26 A C2 use will generate some employment on site, given the potential need for carers, nurses, cooks, cleaners etc. This will depend, however, on the nature of the occupier, their operations and the facility they provide. For example, a care home will clearly generate this type of employment 7 days a week, but a retirement home or 'over 55s accommodation' for example (which often comprise individual apartments) will generate much lower levels of employment, similar to that of a residential scheme in C3 use.
- 7.27 This use will not by its nature impact on local school services (due to the age profile). However, there will be associated impacts on local GP and dental services which will vary according to the type of facility (i.e. whether there is private doctor and nursing services on site or whether residents need to make use of the local NHS service).

Transport Impacts

- 7.28 A retirement/care home is likely to generate minimal trips in the peak periods with 17 and 13 trips in the AM and PM peak respectively, and the overall daily vehicle movements will likely be similar to, but less than, a residential scheme in C3 use.
- 7.29 Parking would be required for residents, visitors and nursing staff of which a considerable amount would be required to be for disabled parking in close proximity to the entrance to the Mansion House with drop off areas and emergency / non-emergency ambulance bays. Whilst some of this disabled parking could be provided in the undercroft car parking proposed as part of the residential scheme, we note that drop-off and ambulance bays would be required at surface level close to the building's entrance. In relation to the stables and walled garden, this will also be a key consideration with potential

impacts on the heritage assets given the need for accessibility to all cores/entrances etc.

3. Commercial and Viability Assessment

- 7.30 JLL has considered the conversion of the Mansion House to provide older person's accommodation and in this instance there are a number of options listed below:
- 1 Registered care home
 - 2 Sheltered housing
 - 3 Retirement village (housing with care)
- 7.31 It is traditionally thought that older people like to retire and live in a quiet secluded country setting. Historically a number of specialist care home and retirement developers have sought more rural locations for their schemes.
- 7.32 More recent thinking is that of equal importance to these operators is attracting staff and providing a high profile for the facility. This is part of their marketing plan that enables them to attract potential residents and resident families. In this regard the Trent Park setting is attractive in its outlook but it would offer a care home operator little or no market profile. It is also likely to be difficult to recruit staff as many are employed on the minimum wage and accessing locations which are more remote from public transport, on which they are often reliant, is difficult.
- 7.33 The Mansion House would provide sufficient size to provide a large and efficient care home however there are little or no precedence of care home developers converting existing buildings let alone listed buildings in recent times.
- 7.34 The requirements of accommodation sizes, suitable floor plates and efficiency of configuration are of key importance to care home providers and this is likely to be difficult to achieve in a protected building. Operators would therefore concentrate on new build opportunities and in our experience will not target conversion opportunities. The potential for an on-site museum (which we understand is a key priority for many in the local community) may deter operators as their primary concern is the safety of vulnerable people, which would be heightened in this situation on the ground floor. JLL marketed a site in south west London where another use was located on the ground floor and this deterred the market due to concerns over that use in the longer term.
- 7.35 The second option would be to convert the property to provide sheltered housing. This would be a retirement development providing older people with a general level of support but no care is provided. These are classified as a C3 planning use and JLL does not consider this an alternative use.

- 7.36 The third and most likely option for older person's accommodation would be to convert the property to a retirement village or a 'housing with care scheme' where JLL anticipates some interest.
- 7.37 These types of facility vary in terms of size and service provision, however generally where they are suburban or in a town centre they total in excess of 50 units with some communal facilities. Sites that are more remote tend to be larger 100+ unit facilities as much more onsite provision is required to make them viable and ensure sufficient facilities are provided to make the scheme appealing and counteract the distance to amenities.
- 7.38 Like care homes, the majority of retirement village developers prefer new build construction, however there are some operators who will convert existing buildings and even listed buildings. As communal facilities cannot be directly sold and are held and operated by the development, a key consideration is to ensure that there is sufficient net sales area to cover the cost of providing them. Schemes will often include swimming pool, gym, spa facilities as well as restaurant, lounges and library facilities. These types of facilities are required, along with a 24 hour onsite care provision in order to secure a C2 residential institution planning use.
- 7.39 Costs of developing these types of facilities are relatively high and typically retirement village operators JLL speaks to require a minimum of 90,000 to 100,000 sq ft of accommodation in order for the development and the ongoing business to be affordable for residents to be economically viable. When converting large listed buildings, it is often the case that significant additional development will need to be provided within the grounds or adjacent in order to cross subsidise some of the additional costs.
- 7.40 Trent Park would almost certainly appeal as a retirement village destination. There are questions marks over whether the Mansion House would provide sufficient quantum of accommodation in isolation. JLL is of the opinion that the majority of operators would also require additional new build units within the grounds or development of adjoining accommodation.
- 7.41 Having a museum area open to the public as part of the scheme would not likely appeal to care home developers due to the reasons detailed in the hotel section and relating to care homes above. In summary the location and broader setting would be attractive and suitable for a retirement village. There are very few within greater London and we anticipate there may be demand from operators. However, the key determining factor would be the overall size of building and accommodation that could be offered to offset the high costs of development and ensure viability.

Summary

- 1 Restricted DDA access to the Mansion House which is seen as critical for those in care/the elderly
- 2 Limited public access to a care home given issues of security and safety of patients, and potential conflicts with the 'quiet' nature of this use

- 3 Parking could be accommodated and low number of trips generated; DDA parking strategy would need sensitive treatment
- 4 No significant impacts on relation to the site's heritage assets, historic landscape and Green Belt location
- 5 Requirement for additional buildings to the Mansion House and requirement to connect these and ensure they are well integrated into the site

7.42 It is unlikely that a care home operator would seek to occupy the entire site, both in terms of the scale of the operation and the costs of maintaining the wider landscape. Instead, it is likely they would take a part of the site, with the remainder in another compatible use such as residential. However, it is important to note that there are no significant benefits of a care home (Use Class C2) over residential (Use Class C3) on this site; they are both within the C-use class and there is no planning justification to accept one but not the other.

Potentially Compatible Mix of Uses

7.43 The approach to the mix of uses with a retirement/care home is very similar to that taken with the residential (C3) use. This could comprise a museum, sport/leisure facility and/or a café.

7.44 The key additional issue with this use would be the type of C2 use proposed. For example, a care home would require a far greater level of 'quiet' and restful spaces, mainly located within the principal rooms of the Mansion House, with a secured unit to ensure patients were safe. However, an 'over 55s' retirement village could be treated in a similar way to a residential scheme, with the potential for a small-scale museum and/or café, with a health club for the use of residents and potentially paying members. These mix of uses would offer the opportunity to provide public access to the site, noting that as with residential, this would be best achieved with a museum space with small café; a café only may not be self-supporting and a health club could be considered exclusive and would require sensitive management with the residents in the Mansion House.

8.0 **Primary and /or Secondary and/or Special Educational Needs School**

Summary of Use

8.1 Given the site's past use as a university, the loss of this use for any alternative needs to be justified in policy terms. Therefore, an alternative would be to maintain the Mansion House in education use and convert the building to accommodate a primary and/or secondary and/or special educational needs school, within Use Class D1 (non-residential institution). Whilst a primary school in floorspace terms may be accommodated within the Mansion House only, a secondary school will require additional buildings, and this is covered in the below assessment below. In addition, educational uses (Use Class D1) require enclosed land surrounding the site for play and security etc. and this requirement is also considered below.

8.1 The various educational use options are set out at Appendix 7 as follows:

- 1 Primary School/SEN School based on BB103 minimum space standards (noting these uses would maintain approximately 224 dwellings on the remaining site);
- 2 SEN school based on advice from LBE of a typical provision for 130 pupils aged 4-19; and
- 3 Secondary School based on two size requirements (minimum based on BB103 space standards and a larger facility based on local examples) which would provide between 18,000sqft and 175,000sqft of D1 floorspace and 118,400sqft and 865,000sqft of outdoor playspace. These would maintain 224 dwellings on the remainder of the site with the smaller facility, but the larger option (based on a local secondary school) would remove the ability to provide new dwellings on site due to its land take and associated impacts.

1. Design and Operational Considerations

8.2 To inform the design layouts for the various school options, multiple options were considered on portions of the site with a need to make use of the Mansion House (for the purposes of this report). Minimum plot and building sizes were taken from BB103 Departments of Education: Area Guidelines for Mainstream Schools with a review of local schools undertaken to determine size and plot requirements, which demonstrates that the areas required (especially for secondary schools) tend to be much larger than the minimums set by the standards.

8.3 The BB103 document recommends standards required to accommodate SEN facilities within both primary and secondary school layouts and for the purposes of the study the schools shown include SEN facilities. However, if a separate SEN school is proposed, BB103 recommends a similarly sized plot

and building size to the primary school. In addition to this, LBE has advised (via Dominic Millen, Group Leader for Transport Planning and Policy) that a local SEN school for 130 pupils aged 4-19 may have a site area of approximately 9,500sqm of which circa 2,000sqm is buildings (various single storey blocks), 3,800sqm is hardstanding and 3,700sqm is landscaped (to include play space). These options have been shown on the plans at Appendix 6.

- 8.4 Clearly further discussions would need to take place with operators regarding the exact requirements for each school type, but this information provides an overview (based on minimum and larger areas) for the purposes of this alternative uses assessment.

Historic Building and Conservation Impacts

- 8.5 Locating a school of any type or size within the Mansion House is not an easy task as the building has some historic and specialist finishes within the ground floor rooms that will need to have protection from being used as classrooms, hall space etc. as summarised in this section by Giles Quarme & Associates.
- 8.6 The problems associated with the different levels of access within the mansion create problems with DDA compliancy and the requirement of specialist schools and standard schools should all be as accessible as possible.
- 8.7 The issues with the floor levels are inherent in the historic door entrance, removed from Chesterfield House and located to Trent Park by Sassoon, which has created the addition of steps into the building. There is a side entrance that has level access. However, there would be the issue of the steps within the stair hall at ground floor which would create the need for two steps to get to the raised stair platform before two steps down into the corridor again.
- 8.8 Other floors have additional access issues, due to the Sassoon period of raising the rear enfilade room ceilings, which has created floor level changes at first and second floors and also a large 1.5m difference between the older Victorian wing and the main corridor at upper levels. This is important to note because the access by lift in the current plan can only utilise the end room of the Victorian block which provides access to the first floor and second floor mezzanine level, which is 1.5m (7 steps) difference to the main corridors of the upper floors). This would be an unacceptable arrangement for an accessible school.
- 8.9 In relation to means of escape, the provision required for institutions is greater than that of residential as there would be a much larger number of people. This creates issues with the historic building.
- 8.10 The increased level of office equipment and class sizes will potentially require a great deal more cabling and AV equipment than is currently supplied within

the house (similar to that of an office use). This would have an impact on the historic fabric with a larger requirement for duct runs and cabling.

8.11 There would also be a requirement for a cafeteria to accommodate the significant number of pupils and this will impact the ground and basement floors and would be better located in a new build element (which is possible with the secondary school option but is not for the primary/SEN schools which are located in the Mansion House only). In heritage terms, the 'wear and tear' imposed by a school, particularly in the ground floor rooms of significance, would conflict with the conservation strategy which Giles Quarme & Associates (on behalf of Berkeley) is seeking to implement at the Mansion House.

8.12 The restoration of the historic finishes at ground floor is being undertaken through full paint and wall paper analysis by specialists in their fields, Patrick Baty and Alyson McDermott. Once complete these rooms would need to be maintained and protected as they will form part of the Listed Building Consent/Application. It would be important to ensure the longevity of these finishes as they will add to the understanding of the historic significance of the rooms. The use of the ground floor with dining spaces and classrooms would need to be managed and a layer of protection will be required to look after the historic finishes to prevent damage.

Public Access

8.13 Public access into a school is also restricted and monitored to protect the children under their care. This will limit public access to various significant rooms on the ground floor (evenings/weekends only – with limitations on room layouts/uses) and the basement, which will need to function as a working catering kitchen and will impose a greater ventilation and equipment requirement than a residential use which would prevent public access to much (if not all) of the basement area.

8.14 In addition, public access would be limited to the school's outdoor play/sport provision, which will vary in its extent based on the type and size of the school. This is addressed further under the Planning Policy section below.

2. Planning Policy

The Development Plan and Council Guidance

Core Strategy (2010)

8.15 Core Strategy Policy 8 (2010) relates to education provision in the LB Enfield. It states that new school facilities should be provided on sites that offer safe and convenient access by pedestrians, cyclists and public transport users, encouraging the use of the school buildings for other community purposes in the evenings and at weekends.

- 8.16 Policy 8 specifically sets out a 15 year plan for the delivery of facilities which will meet the needs of existing and new communities in the Borough. Alongside the planned expansion of specific existing schools, new schools are proposed at:
- 1 New Oasis Academy Hadley all age school (3-18 years) at the former Gas Holder site, Ponders End, to include 2-form entry primary; 60 part time nursery places; 8-form entry secondary; and provision for years 12 and 13 (i.e. 6th Form) [scheme built out]
 - 2 An all age school on the existing Broomfield Secondary School site [identified under the adopted North Circular Area Action Plan 2014 – only if required in addition to the Heron Hall Free School, which opened in September 2013, and two new Academies, both due to open in September 2014]
 - 3 New 6-form entry secondary school in the south east of the Borough to include provision for years 12 and 13 (6th form)
 - 4 Two new 2-form entry primary schools (with nurseries) and a new 6-form entry secondary school (with 6th form) in Meridian Water
 - 5 Up to 2-forms entry primary provision, including 60 part time nursery places in the area around the north circular in the south west of the Borough [opportunities for a new primary school at Grovelands Park for 2017 are explored in the North Circular Area Action Plan 2014]
 - 6 Up to 2 forms entry primary places including 60 part time nursery places in the Enfield Town/Bush Hill Park area [addressed in the emerging Enfield Town AAP]

- 8.17 It is also noted that the Council will support the provision of a new specialist education centre in the south east of the Borough as set out in Core Policy 16.

Enfield's Development Management Document (2014)

- 8.18 Further to the policies of the Core Strategy, Enfield's Development Management Document (2014) sets out policies on community facilities. It is noted under Policy DMD16 that new facilities (including schools and other educational and training institutions) will be permitted where it:
- a Is demonstrated to have a community need;
 - b Makes an efficient and effective use of land and buildings, and where appropriate, provides opportunities for co-location, flexible spaces and multi-use;
 - c Is easily accessible to the community it is intended to serve by walking, cycling and public transport to reduce dependence upon private car transport;
 - d Is designed to provide access for physically impaired users, in accordance with DMD 37 'Achieving High Quality and Design-Led Development';

- e Does not harm the amenities of neighbouring and nearby properties;
- f Does not have a negative impact on the area in terms of the potential traffic generated

Enfield's Infrastructure Delivery Plan Review (2014)

- 8.19 LBE's Infrastructure Delivery Plan Review (2014) states that the total number of both primary and secondary age children seeking school places is predicted to rise significantly over the next 10 years. In relation to primary schools, a strategy is set out for the expansion of existing schools and provision of new schools which it is noted will provide additional capacity of up to 13% over base projections, with an associated risk of over-provision of capacity which needs to be carefully monitored.
- 8.20 In relation to secondary schools, it is predicted that demand will begin to exceed supply in 2017. It is noted that the Oasis Academy Hadley has now opened in its new premises, and a new all-through academy (ARK John Keats Academy) will open at the vacated premises. In addition, Heron Hall Academy and St Andrew The Apostle Free School have both opened (the latter is in Barnet but draws some pupils from Enfield) and a further secondary school academy has been approved by DfE, which will be sponsored by ARK North Enfield and locate in the north of the borough. Reference is made to a revised pupil place strategy to ensure planned and phased provision.
- 8.21 In relation to Special Needs Provision, the Infrastructure Delivery Plan Review notes that a strategy is being developed for the provision of additional pupil places in Special Schools and alternative provision in mainstream schools.

Cabinet Report and the Annual Report on Pupil Place Provision, Demand and Delivery Options (2015)

- 8.22 In the context of the above, we have reviewed the Council's Cabinet Report from October 2015 and the appended '*Annual Report on Pupil Place Provision, Demand and Delivery Options*' as it is more up to date. This provides some important and helpful information on the latest position on education provision in LB Enfield. In summary, the Report states the following:

Primary School Provision

- 8.23 It is noted that there is a need to deliver 11 additional permanent forms of primary entry by 2019; current plans account for 9 of these, with early discussions progressing in relation to two additional.
- 8.24 There is current space capacity in schools and plans to create additional places and demand can be met over the 2015 to 2019 period at the borough level. In addition to current plans, there will be a need to provide two form extra primary entry (one permanent, one temporary) in the South East area

and potentially one more in the West of the borough. Funding has not been allocated for these and LBE acknowledges a need for an assessment of local provision, including cross-borough as it may provide the capacity required.

- 8.25 In West Central Enfield, extra capacity is required from 2018 where the surplus capacity is expected to drop to less than 1%. However, this is subject to an annual review of GLA projections and assessment of whether planned additional capacity in the south-west can serve the West Central Area. The Grovelands expansion is identified as an option to meet this demand [we have reviewed progress on this site through research on LBE's website and note that concept plans were prepared in 2013/14 and the Council is noted to be 'in discussions with Historic England prior to undertaking a wider public consultation event'].

Secondary School Provision

- 8.26 There is a need to deliver 10 additional permanent forms of secondary school entry by September 2018 and 2019. Current Education Funding Agency plans will deliver 11 forms of entry over this period which means there is no need or available funding for Council delivered secondary schools up to 2019.
- 8.27 In addition, beyond 2019 there is a predicted need for another 10 forms of entry by 2020 and another seven by 2023. It is noted that ideally, opportunities to provide additional places in the West of the Borough are required in advance of 2020 to help balance provision across the Borough, and options for capacity here need to be understood and confirmed. Appendix A states that "*A new secondary school proposal in the west of the Borough which could provide up to eight forms of entry to help meet required demand by 2020*". This would require application and approval from the EFA.
- 8.28 The Secondary School Places Briefing Note (October 2015) also confirms that '*additional capacity in the west of the Borough would be beneficial in advance of Borough wide absolute need identified for 2020*'. However this does not take into account any plans that could increase capacity within existing schools and significantly we note that the "west of the Borough" covers a significant area to the west of the A10.

Special Educational Needs

- 8.29 There is a need to increase capacity in schools and establishments that provide education services for some of the most acute special needs categories. It is noted that plans are developing for 126 additional places which is dependent on land acquisition at Minchenden.

Planning Assessment

- 8.30 It is firstly important to consider the need to protect community facilities and how this relates to the site's existing lawful use (Use Class D1 (and C2) – university campus). Policy DMD17 seeks to protect existing facilities unless a

suitable replacement facility is provided or there is evidence that there is no demand for this use or any alternative community use. Therefore the provision of another educational use on the site would accord with policy, as it would be retained in D1 community use.

8.31 However, we note that in this regard there are two important factors:

- 1 Middlesex University relocated its facilities from Trent Park to their existing Campus at Hendon as part of a reconsolidation of their operations. The delivery of a school on site would therefore not need to 'protect a community facility' as this facility has already relocated and has not been 'lost'; it does not need 'protection'. It would instead deliver a new community facility (policy DMD16); and
- 2 The site was marketed to educational operators and:
 - i LB Enfield considered the site for its own educational needs and confirmed that whilst there is a need for primary and secondary places, it is not in this location – there is therefore no immediate local authority need for continuing educational use but the Council would need to see it demonstrated that effort has been made to identify an alternative educational provider (see Trent Park Planning Statement 2012 for this information). Any school on the site would therefore need to be private in nature;
 - ii The costs involved in the restoration of the site's heritage assets and the overall viability for educational use are considered to be key factors which limited interest from private educational providers – see commercial and viability section of this report.

8.32 In relation to the provision of a new school on site, policy DMD16 would therefore apply. This policy supports educational use subject to specific criteria. Key aspects of this policy can be addressed under the 'need' for school places (which links to London Plan policy that education provision should meet demand) and the 'accessibility' of both the site and the Mansion House. These are considered further below.

Need for School Places

8.33 As set out under the review of the various relevant documents above, different conclusions can be reached for the differing school types.

8.34 In relation to primary school provision, the policy position is that there is no requirement to provide a facility in this location. A review of the more recent evidence base (Cabinet Report 2015) demonstrates that demand can be met to 2019 but there will be a need to potentially provide one additional form of entry in the West of the borough. However, funding has not been allocated and there is a requirement to assess local provision before this is progressed, including cross-borough (which may provide the capacity required) and it may be that planned additional capacity in the south-west can serve this need (for example, the Grovelands expansion).

- 8.35 Any future need for an additional primary form of entry is therefore currently unknown and there is no evidence to show this is required in the area surrounding Trent Park. Given the project programme, there will be no outstanding need for primary provision at the time a planning application is made and it is therefore not considered that this is an appropriate alternative use.
- 8.36 In relation to SEN provision, the 2014/15 reports state that there is a requirement for additional pupil places in Special Schools to provide education services for some of the most acute special needs categories. However, we understand that plans are developing for an SEN school at Minchenden (at a former college site) and this would provide for the outstanding need in relation to a new facility. It is therefore not considered that there is a need for an additional facility at Trent Park.
- 8.37 Finally, in relation to secondary school provision, there is no outstanding need to 2019. The 10 additional forms of entry required are being met by planned/delivered provision. Beyond 2019 there is a need for another 10 forms of entry by 2020 and another seven by 2023 and we note that there is reference to the need for opportunities to be identified in the West of the Borough by 2020. However, we also note that this need for the western area does not take into account any plans that could increase capacity of existing facilities and that this covers a significant part of the Borough (south-west as well as north-west and western central).
- 8.38 Further work is therefore required by LBE to identify where in the 'west of the Borough' this need should be focused, based on existing and emerging provision and the capacity provided by neighbouring Boroughs, before a site such as Trent Park can be identified beyond 2020.
- 8.39 Notwithstanding this, we note that given the current condition of the site and in particular the deterioration of its heritage assets, the programme for development is urgent and investment is required well in advance of 2020. It would be speculative to propose a large new secondary school at the site now, without any Council interest/investment and without any commitment from a private education provider given the lack of evidence of demand in the next 4-5 years. On this basis, whilst there is likely to be demand for additional secondary school forms of entry beyond 2020 and 2023 in the west of the Borough, the proposals for the site need to be taken forward urgently and investment needs to be made over the next 12-24 months. Therefore it would not be appropriate to delay the development of the site in the hope that there may be a need for a school site at some point in the future.

Accessibility

- 8.40 London Plan policy (3.16 & 3.18) and local policy (Core Policy 8 and DMD 16 & DMD 42) require that schools should be accessible to all sections of the community (including the disabled) and located within easy reach by walking, cycling and public transport (with reduced dependence on private cars). New

community facilities should provide access for physically impaired users (inclusive design) and have no negative impact in relation to traffic.

- 8.41 The Trent Park site has a PTAL rating of zero and therefore cannot be considered to be within easy access by public transport. It is also a 15-20 minute walk from the local centres of Oakwood and Cockfosters and is remote from existing communities. In policy terms, it is therefore not a suitable location for education provision and the majority of school children would need to be dropped-off by car and staff would also likely arrive by car. The issue of limited accessibility is reflected in LB Enfield's review of the site for its own education provision, where it was concluded this location is not suitable.
- 8.42 In addition, we note that education provision should be accessible to all, including physically impaired users, and we note that this does not apply to the Mansion House; only limited access can be provided within the constraints of the historic fabric, even with the installation of ramps and lifts where possible. This is set out in detail in the design section above.
- 8.43 Finally, in relation to traffic impacts, this is set out further below but it is clear that any primary/secondary school provision on site will add significantly to the AM peak hour trip rates and would be greater than a residential use on site. This would require further testing to determine whether this would have a 'negative impact' on the area in terms of potential traffic generation as set out by policy DMD16.

Heritage and Landscape Impacts

- 8.44 Excluding primary and SEN provision, for which there is no outstanding need in policy terms (as set out above) we have considered below the heritage/landscape impacts of a secondary school on site, given there may be a need beyond 2020/2023.
- 8.45 In relation to the smaller secondary school option, this would require a secure fenced boundary around the Mansion House and the new west-wing, enclosing a site area of approximately 120,000sqft. This fence would impact on the setting of the listed Mansion House/terrace and the adjoining swimming pool/Orangery (which may be severed from the house) and the surrounding historic landscape. In addition, play equipment, sheds/storage, tables/seating etc. would be required, all in close proximity to the Mansion House. This would have a negative impact on the setting of the listed building and the character of the historic landscape and its parkland setting. Public access to this part of the site, including the terrace, would be prevented
- 8.46 In relation to the larger secondary school option, this has a significant land take of 865,000sqft, which would need to be secured for the use of the school. As can be seen from plan 5902/SK/131A, this would require a substantial part of the site to be fenced. This would have associated impacts on the historic landscape and the setting of a number of heritage assets. We also note that this site area would, in addition to the Mansion House/terrace,

include the key heritage assets of the swimming pool/Orangery, the stables, the walled garden, large parts of the historic landscape and the various unlisted buildings of merit, as well as enclosing (but not necessarily including) Wisteria Walk. The types of buildings required for a large secondary school, the associated car parking and the sport and play facilities would all have an impact on the setting of these assets. In particular, Wisteria Walk would be unacceptably segregated from the rest of the site.

8.47 In addition, we note that the space required for playing fields and structured play areas would be very difficult to fit within the historic buildings and landscape due to their land take and the location of key trees, statues, buildings etc. In addition, the site's topography makes it very difficult to accommodate sports pitches without significant re-levelling required, and these would be isolated from a school in the Mansion House due to the site levels. As can be seen from the appended drawing, these have simply been indicated where they might be accommodated, but these areas are not necessarily considered suitable.

8.48 Significantly, this proposal would fence the majority of the site and therefore public access would be extremely restricted. There would be limited opportunity to enjoy the historic landscape and its key features, and the community would be unlikely to support this. Rather than integrating the site within the wider Country Park, this proposal would segregate it and break up the landscape, altering its character and delivering few benefits over the existing development on site.

8.49 Finally, we note that simply because the site has been in educational use, this does not imply that it is a suitable one in the future. As can be seen from the present condition of the site, there has been a significant amount of inappropriate development and the landscape does not lend itself well to this use.

Green Belt

8.50 The proposals could limit the extent of built development to less of the site than the proposed housing scheme, but this would comprise new buildings with large footprints which would lack the articulation, variation, different heights and roof forms that a residential scheme could provide and this containment of built form would not necessarily have a reduced impact on the openness of the Green Belt. Indeed, we consider these large buildings, similar to the office park alternative use, would not be in keeping with the parkland environment and, with the addition of a secure fenced boundary, would not enhance the character of the Green Belt or the conservation area.

8.51 In relation to sports pitches on site, we note that there is likely to be a requirement for artificial surfaces and some floodlighting to ensure these facilities can be used throughout the winter. This is particularly relevant to this location and the type of private school operator likely to locate here (capitalising on its rural location and the potential for sport provision). However, policy states that sports facilities on existing open space,

particularly the Green Belt, will need careful consideration and proposals for artificial pitches with floodlighting will be refused in the Green Belt other than in very special circumstances.

- 8.52 We do not consider that the significance of the historic environment at this site, along with its Green Belt location, can accommodate this provision without significant adverse impacts.

Social and Economic Impacts

- 8.53 The provision of a school on site would deliver jobs at Trent Park as well as providing a new facility for the community. It will therefore have social and economic benefits. We do note however that these social benefits would only be realised where there is a need/demand and this is very limited in this location.
- 8.54 In addition, there would be a reduction in the community's access to the site under the large secondary school use, with limited opportunities to understand and appreciate the site's history, with associated social impacts.

Transport Impacts

Primary School

- 8.55 A primary school, as set out at Appendix 3, would have significant trip generation in the AM peak period, estimated to be 294 two-way trips. This is due to the low accessibility of the site by public transport and many parents would choose to drop off and collect younger children from school. Staff parking would also be required and a large drop off / pick up area (likely with a one-way circular loop) would be needed for parents to avoid congestion around the site. Given the primary school would be located in the Mansion House, this would have the potential to impact on this heritage asset as all parents would need to drive around the daffodil lawn for drop off close to the entrance (and the Union Jack terrace).
- 8.56 Overall, the daily trips for a primary school would be circa 955 which, when added to the residential trips generated by the remaining masterplan development, create additional daily trip movements of 879 when compared to the residential use proposed.
- 8.57 As set out above, accessibility through the site would also be reduced as a school is likely to be securely enclosed by fencing / barriers.

Secondary School

- 8.58 A secondary school would have significant trip generation in AM peak period, estimated to be 225 two-way trips for the smaller secondary school or 411 for the larger facility (as set out at Appendix 2). This is due to the low accessibility by public transport with many students being dropped-off and collected. Staff parking would be required and coach parking would be

required which could be used to take children to and from school as well as excursions.

8.59 Both secondary school developments would generate significantly greater daily trip rates than the proposed residential scheme. However, as can be seen with the larger option (with no residential on the remaining site) the number of daily trips for education is 1,564 which is 476 more than the residential scheme but with 227 of these additional movement in the AM peak, which is significant for the local highway network.

8.60 To a much greater extent than a primary school (given size and site area), accessibility and permeability across the site would be significantly reduced as it is likely the school would need to be enclosed by fencing for security reasons. This could exclude the large majority of the site from public access, as set out above.

SEN School

8.61 An SEN school in the Mansion House is likely to generate 83 two-way trips in the AM peak period due to the low accessibility by public transport. Given the nature of the school a large proportion of students are likely to be dropped off and collected, particularly disabled pupils. Staff parking and disabled parking would be required (which could be located in the proposed undercroft car park, but this would be subject to cost and viability for this use) and it is likely that coach/mini bus parking would be required in close proximity to house for DDA access.

8.62 Whilst not as significant as the other two school types, this use would still generate additional AM trip rates to the residential scheme. It would also have similar drop-off/circulation and congestion issues as the primary school, with potential impacts on the Mansion House and its Union Jack terrace.

3. Commercial and Viability Assessment

8.63 We have undertaken a value study based around the assumption that the existing buildings, including the Jebb building and the Music building, are restored to education use and the property is then available for sale/let to a D1 operator. JLL was responsible for the marketing the complex in 2012 and the information below was, in part, gleaned from this process.

8.64 We consider that there are a number of issues relating to the site which inhibit it from being used for D1 use. These include:

- 1 Location: Trent Park is circa 12 miles from central London and this journey on public transport can take circa 60 to 80 minutes. This is an important consideration for any higher education operator and in particular those with international links as proximity to central London is a key selling point to its international students. The nearest underground stations are Cockfosters and Oakwood both of which are one mile from Trent Park. This issue was one which was raised by D1 operators who

submitted bids. They concluded that they would have to use shuttle buses from Oakwood tube station.

- 2 Costs: The Mansion House is in a poor condition and there are substantial costs relating to refurbishing and maintaining the listed Mansion House and grounds to Historic England standards.
- 3 Size: The D1 market is a small market compared to other markets and therefore interest is limited. There are a sufficient number of local colleges in the area and therefore interest is most likely to be from international colleges or universities. D1 operators are likely to be interested in the whole site and not just to the Mansion House. From an operational perspective it is difficult to envisage colleges co-locating on this site.

8.65 Enfield Council's Planning Statement (adopted in July 2012) refers to the site working well as an educational institution. This Planning Statement notes that it "would need to see it demonstrated that every effort is made to identify alternative education provision, whether this is through private education, HEIs, FEs, or other education models."

8.66 There are a range of different educational operators/investors in the market with a variety of requirements; however it is a small market when compared to other more mainstream markets. The main areas of activity in the market are being seen from the following categories:

- Free schools
- Overseas schools
- Universities/colleges within London, from the regions and overseas
- Private schools operators
- Other 'one off' organisations such as "Special School" operators such as Priory Group.

8.67 When the site was initially marketed in 2012 there was interest from education providers. While unconditional offers were being sought, both unconditional and conditional (subject to planning offers) were received. In total there were nine interested educational providers. Of the nine, three showed only general interest, two submitted bids which were conditional on funding from The Department of Education and four submitted a financial bid.

8.68 The education providers which submitted a bid ranged in type. Most were relatively new to the market and had international connections. They included a Malaysian higher education medical college, an American primary / secondary college, a higher education business school, a primary school academy and a number of free schools.

8.69 The site was put under offer on two occasions to international education providers, but both potential sales fell through due to incomplete business cases and the lack of investment support at board level. Both agreed sales

were in excess of £35 million. These sales were essentially unconditional, save for being subject to external finance.

- 8.70 In 2012 the site was ultimately bought by Allianze University College of Medical Sciences (AUCMS) for £31.5 million. AUCMS was a Malaysian medical college founded in 2002 and they were planning to deliver its medical degrees under a partnership established in 2011 with National University of Ireland, Galway, and University College Cork. Unfortunately the scheme did not succeed and AUCMS's subsequently went into administration.

Table 8.1 Summary of interest in 2012

Financial Bid
ACMS Medical School (Malaysian Medical School)
The Dwight North London International School / Oracle Capital Advisors Limited
The London School of Business and Finance
Cuckoo Hall Academies Trust and The Goodman Group UK LLC
Bid subject to Department of Education funding
St Andrew the Apostle (<i>The Greek Orthodox School</i>)
Free School
General Interest
Royal Vets College
Kensington College
Cognita Schools

Source: JLL

- 8.71 JLL was appointed to sell the site on behalf of the receivers in April 2015.
- 8.72 A two phase bidding process was carried out, with a reduced shortlisted being invited submit proposals leading to the completion of the Proposed Transaction.
- 8.73 In contrast with the 2012 marketing process, in 2015 there was no standalone educational interest at all for the site. Only one bidder considered bringing in a school as part of their bid, but the free school operator only wanted the Mansion House and stables, which created a reduction in the wider development value to the bidder, and ultimately the inclusion of a free school was considered unviable given it could not be supported in the context of a depressed value for the remainder of the site.

Other Schools

- 8.74 Within three and a half miles of Trent Park there are according to Ofsted five independent secondary schools and 16 state secondary schools with approximately 17,500 secondary school pupils in attendance. Of these schools, only one submitted a financial bid for Trent Park (The Dwight North London International School). The school was looking to rationalise its lower and upper school sites in north London onto one site but the school's bid fell through as it was unable to get investment support from its board.

- 8.75 Regarding Free Schools, according to the New Schools Network there are two within three and a half miles of Trent Park which have been established since 2011. These include:
- St Andrew the Apostle Greek Orthodox School: a secondary school, opened in 2013 with 1,050 pupils; and
 - Alma Primary School: a Jewish designated school, opened in 2013 with 210 pupils
- 8.76 St Andrew the Apostle Greek Orthodox School had submitted interest in Trent Park however its bid was conditional upon funding from the Department of Education and this risk meant that it could not submit a financial bid within the marketing timescales.
- 8.77 We understand that Enfield Council had previously considered the site for its own education needs and whilst there was a need for primary and secondary places, it was considered that it was not in this location. It was therefore considered that there was no immediate local authority need for continuing educational use.
- 8.78 An education site can be used by several different types of school, including primary, pre prep, preparatory / secondary schools and sixth form schools/colleges. There are also niche markets for language schools etc.
- 8.79 We believe the site to be unsuitable for use as a primary school owing to the lack of easy access to the surrounding urban area and distance to public transport.
- 8.80 The site could suit a Prep school (7-13) or senior school assuming that adequate on-site parking was provided to allow access by car. However, based on the estimated costs associated with restoring and maintaining the fabric of the Mansion House, it is likely that the viability of such a use would be constrained, and demand would be limited on this basis.
- 8.81 We consider that interest is unlikely to be received from “Special Schools” operators as the buildings would be very difficult to convert into appropriate accommodation for pupils with special needs and many such schools also provide accommodation on site which would be hard to carve into the existing structures. Most schools of this type are located in country areas and with accommodation often being provided on site, or special bus services commissioned, they have less need for close proximity to public transport.

Summary

- 1 Issues of DDA access to the Mansion House which is a requirement for an educational use
- 2 Potential impacts on the historic fabric due to nature of use as classrooms, hall space etc.
- 3 Servicing requirements are high including the need for cabling, AV equipment, cafeteria etc.

- 4 Very limited public access to the Mansion House and its surrounding landscape (large land-take for play facilities)
- 5 Development Plan doesn't require any educational provision in this area
- 6 Current educational need for secondary school beyond 2020/2023 in the 'west of Borough' hasn't yet been quantified or confirmed – project must commence urgently due to historic asset condition
- 7 Lack of demand for an educational facility in this location – issue of accessibility and cost
- 8 Significant trip generations by private car, particularly in the AM peak
- 9 Green Belt impacts resulting from sport pitch provision
- 10 Social and economic benefits

Potentially Compatible Mix of Uses

8.82

As agreed with LB Enfield officers in the drafting of the uses Matrix at Appendix 2, there is not use which could be compatible with a primary, SEN or secondary school within the Mansion House given issues of security and restricted access to a building where children are studying.

9.0

Museum or Community Use

Summary of Use

9.1 The Council's Planning Statement refers to potential alternative community uses at the site within Use Class D1, including a museum. Clearly a museum within the Mansion House only could be considered an appropriate use given the site's significant history and the role of the house in World War II, providing public access to the heritage asset and is the only 'genuine' publicly accessible community use for the Mansion House. This use is therefore considered in further detail below. This museum/community use could comprise D1 floorspace of up to 33,339sqft (GEA), maintaining 229 dwellings on the remainder of the site.

9.2 Appendix 8 provides plans prepared by Giles Quarme & Associates which demonstrate the restrictions of the listed building and the potential issues associated with using the entirety of the Mansion House for a community/museum use.

1. Design and Operational Considerations

9.3 Using the entire Mansion House as a museum/community use would limit access to certain parts of the building:

- 1 The upper floors have inherent problems with access and levels and have been altered substantially over the years from the raising of the rear principal ceilings in the north facing enfilade rooms by Sassoon to the insertion of large steel beams to increase the possibility of floor loadings. The most substantial floor change is between the Victorian wing and the main floors. This causes an issue with the suitability of the placement of lifts to mezzanine floors/full floors which would not provide level horizontal access to each floor of the House. The building could not be made DDA compliant on the upper floors.
- 2 This is also an issue at ground floor with the main staircase, where the main spine corridor has two steps up and down; this would need to be altered.
- 3 A new disabled access or ramp will need to be incorporated to the main entrance door to overcome the steps into the building.

9.4 With the change of use come other aspects that require fulfilling and they include the requirement of structural loadings following a change of use. The following documents would need to be adhered to in accordance with Building Regulation A:

- a BRE Digest 366: Structural Appraisal of Existing Buildings, Including for a Material Change of Use, 2012
- b The Institution of Structural Engineers Technical Publication Appraisal of Existing Structures (third edition), 2010

- 9.5 The provision of a museum with access across the entire Mansion House would allow the public to access all the rooms including the basement (at least in part due to servicing). However, we note that the rooms of significance are on the ground floor and basement and there is little left of the building's history on the upper floors for the public to appreciate. Other community (D1 Use Class) uses may not provide genuine public access to these rooms.
- 9.6 The proposal for a museum/community use would permit continued public access across the site. The access to the landscaped gardens/terrace could be incorporated into the museum/community facility remit and would need to be serviced as part of the museum ownership and funded by revenue generation.
- 9.7 The servicing of the entirety of the Mansion House as a museum would require a much higher level of service vehicles, refuse collections, and more car parking facilities than would be required for a residential use.

2. Planning Policy

- 9.8 There is a policy requirement set out in the London Plan and local policy to apply the town centre first sequential approach to a museum/community use. However, given that this use would be specific to the history of the Mansion House and its landscape, we consider that a policy case could be made that the sequential test does not apply; there is a location-specific requirement for this use to be on site.
- 9.9 In addition, policy sets out that social infrastructure should be accessible to all sections of the community (including the disabled) and located within easy reach by walking, cycling and public transport, with access for physically impaired users and where there is no negative impact in relation to traffic generation.
- 9.10 As set out in earlier sections of this report, the site has poor accessibility to public transport (PTAL zero). Should the entirety of the house be in D1 use, this would be a substantially facility and would need to attract significant visitor numbers. As set out earlier in this report, a museum would need to be of a national scale and attract substantial daily visitor numbers to be viable. Given the site's location, it is likely that the majority of these visitors would arrive by private car/taxi/coach rather than public transport, and few would walk as the greatest percentage would be tourists rather than locals.
- 9.11 In relation to accessibility and transport impacts, this creates a conflict with the locational requirement for the museum i.e. the museum has to be at the site to provide an understanding of its history, but the site by its very nature is not suitable for this type of facility due to its accessibility. On this basis we consider that a policy argument can be made for a smaller-scale facility which would be focused on the local community and a more limited national audience. This is also reflected in the transport section below (limiting parking requirements, trip generation and coach movements) and the overall viability

and commercial approach to this type of use in a listed building and landscape.

- 9.12 Finally, in relation to disabled access and the need for the museum/community use to be accessible to all, it is clear from the above design section that the entirety of the Mansion House cannot be made fully accessible due to restrictions of the historic fabric and its significance. This also supports the approach of providing a museum where access can be provided (i.e. the ground floor) and the majority of the site's history can be appreciated.

Heritage and Landscape Impacts

- 9.13 There would not be any adverse impacts on the site's wider heritage, including the landscape, as a result of providing a museum/community use within the Mansion House. The key issues will be minimising parking in close proximity to the House and preventing coach parking, to ensure these do not impact on the asset's setting. A smaller-scale facility with DDA parking and no coach facilities would support this approach.

Green Belt

- 9.14 The impacts on the Green Belt are similar to the above and are only likely to arise if a large facility was proposed which comprised significant car and coach parking within the landscape.

Social and Economic Impacts

- 9.15 The proposal for a museum or community use in the Mansion House would have a number of social benefits for the local community and would generate employment on site (noting that in reality these types of facilities are often run, at least in part, by volunteers).

Transport Impacts

- 9.16 A museum which occupies the entirety of the ground and basement levels and is of a large 'national' type museum would require significant parking to accommodate the museum visitors as well as parking for staff, with resultant high numbers of vehicle movements throughout the day (and all days of the week, particularly weekends). LBE Highways Officers have been clear that there should be no car parking associated with a museum use (with the exception of disabled car parking provision) due to the site's location and traffic impact of encouraging non-sustainable modes of travel.
- 9.17 A large number of coach spaces would also be required to accommodate groups, due to the limited access by public transport for visitors. A taxi drop off area would also be required. Coach parking for coaches ranging from 12 – 15 metres would result in a large area of the site nearby the proposed Museum to be designated for parking, with associated heritage and Green Belt impacts. It is therefore considered that a smaller-scale museum facility

would be more suited to this location which targets a local and a limited national audience with fewer vehicle movements.

3. Commercial and Viability Assessment

- 9.18 Within the Council's Planning Statement for Trent Park Campus, the Council have a requirement to 'preserve and enhance the Borough's heritage' and believe 'that heritage assets almost always present opportunities to increase the value, quality and unique character of a development'.
- 9.19 The Planning Statement refers to a variation of uses on site, including museum use (Class D1) and the use of the Mansion House within the Trent Park Campus for museum or similar community use within this Class is discussed further.
- 9.20 At present, the market for museum users is weak and there are no known museum institution located either regionally or nationally which is looking for new premises, as front of house facilities are being consolidated, and the only requirement from museum operators is currently for additional storage facilities.
- 9.21 Museum operators often favour large, more modern, open plan buildings that allow flexibility for galleries and exhibitions and are also dependent on good links with public transport in order to capitalise on higher visitor numbers so an older, listed building would not be as attractive. Museum operators may also require an element of mechanical & engineering plant and given the listed status of the building, this could be a significant challenge.
- 9.22 A museum scheme which is local authority led could be more suited to the Mansion House, but we understand that given funding challenges it is difficult to find operators at this level, and where they have progressed, these are often in smaller premises and more 'low key' properties.
- 9.23 JLL have reviewed the museum operators within the immediate area extending to Barnet and Enfield, with a brief overview of the closest providers as follows:

Table 9.1 Museum Operators in Barnet and Enfield

Museum	Property	Comments
Enfield Museum	Located in the Dugdale Centre, an arts and business centre	Permanent exhibition on Enfield Life with rotating exhibitions Open every day
Forty Hall & Estate	Grade 1 Listed Jacobean Manor House	Permanent exhibition on display, providing information about the history of the Forty Hall Estate. Additional events and exhibition programmes, with café, farm, parkland and Banqueting Hall available for hire Open Tuesday - Sunday
Whitewebbs Museum of Transport	Converted former Victorian pumping station with ancillary buildings	Transport museum Open Tuesdays and the last Sunday of each month

Barnet Museum	Georgian house in a conservation area	Focus on the history of Barnet with extensive archive Open Tuesday – Thursday and Saturday and Sunday
Francis Skaryna Belarusian Library and Museum	Residential property	Collection of Belarus related print publications Open Saturday

Source: JLL

9.24 The museums show that the offering in this area is generally for smaller museums which are either for location or subject specific museum use and all are either co-located with wider council or leisure uses or do not open every day.

9.25 A smaller-scale museum/community facility in the Mansion House could potentially suit a gallery operator as the building configuration is likely to be more suited to this purpose and the age and listed status would not necessarily deter occupiers. The challenge facing gallery use is the location as an element of advertising would be required and again there are few gallery occupiers who are looking to relocate outside of London. At present we are only aware of the Ben Uri gallery who wish to relocate to new premises, but their requirement is to move to a more central London location, again to be closer to public transport.

9.26 Museum use within the Mansion House at Trent Park would support the Council's objectives, and is sensitive to the age, character and listed status of the property, but it would not suit a national museum operator given lack of demand, the age of the building and listed status, along with distance to public transport. As the wider Trent Park gardens are open for community use this may also be a negative aspect given security and access control.

9.27 We consider that any museum use here would need to be related to the history of the house and grounds and local authority led given that this is not a destination location with national significance, for example like Bletchley Park, it is unlikely that the museum would be open every day, there would be limited employment connected with this use and it would generate limited revenue. Although museum/community uses could be provided in part of the building it is difficult to envisage this successfully co-locating with many other alternative uses as set out elsewhere in this report.

9.28 With regard to cost for museum uses, these are driven by the following:

- 1 Size, which varies between 800 sq m for a community type use and 5,000 sq m for an international standard museum / art gallery. A local museum would be at the lower end of this range.
- 2 Fit out requirement, determined by:
 - i The nature of the exhibits, and exhibition - permanent displays of collections, rotating medium-term exhibitions, temporary exhibitions
 - ii The concept behind the exhibition and the key messages being conveyed

- iii Organising installations, display cases and interactive units in order to communicate the narrative without disrupting visitor movement
 - iv The preservation requirements of the exhibits and whether highly sensitive objects can be grouped in one space without harming the narrative of the exhibition
 - v The learning opportunities and how these are integrated into the exhibition
 - vi Way finding, which is determined by the way the exhibition is organised (that is, chronologically or by theme)
 - vii Configuring the displays so that they are easily viewed but still secure
 - viii The use of interactive displays and their location, since this will impact on the operational flow of the museum and create environmental “hot spots” which would be difficult to normalise in order to maintain stable conditions.
- 3 Configuration, where the drivers include:
- i Exhibition spaces commonly require high floor-to-ceilings and column-free spaces
 - ii The size of the collections to be housed and the type of artefacts
 - iii The predominant method of display
 - iv Special requirements: these may include auditoriums, lecture theatres, spaces to include temporary or permanent exhibitions, archives, conservation
 - v The projected rate of growth of the collection (future proofing)
 - vi The target number of visitors, to dictate the amount and type of space to be allocated
 - vii The requirements of the curatorial staff
 - viii The business plan of the institution, which will define anticipated revenue streams.
 - ix Vertical transportation (if applicable): large numbers of people require to get to upper levels quickly; large goods lifts may be required for artefact movement.
 - x Security: Balance between electronic and physical monitoring/detection/ and management
 - xi The floor loading designated for a museum is 4.0 kN/m². Loading capacity could be up to 15kN/m² where heavy sculptures are exhibited. Having said this for historic buildings localised strengthening may be more appropriate.

9.29 The fit out scope would typically include jumbo metal stud partitions, timber flooring, raised floors, plasterboard acoustic suspended ceilings, black out blinds, air-conditioning, mechanical & electrical services and security installations.

- 9.30 Taking the above into account, at an indicative high level, the usual range for museum fit out is around £1,000 – £3,000 per sq m and it is anticipated that to integrate this into a listed building, an uplift of 15 - 30% would apply.
- 9.31 Exhibition fit out (including setworks, cases, interactives, graphics, electrical / lighting enhancements, AV, etc) would range from £1,500 per sq m for a simple fit out to £5,000 per sq m for a more bespoke fit out
- 9.32 These costs exclude external works, enabling works, demolitions / alterations, professional fees, VAT, FF&E and site specific abnormals.
- 9.33 While the cost of converting the heritage buildings for museum use might be broadly comparable to the cost of conversion for other uses, there is likely to be limited revenue associated with this use, and therefore the provision of museum use, in isolation, would be unviable.

Summary

- 1 Restricted DDA access to all levels of the Mansion House
- 2 Sequential test and inappropriate location for a community use (lack of sustainable access etc.)
- 3 Significant visitor numbers required to support large facility – car and coach generation significant and large parking areas required
- 4 Weak market and no ‘national’ demand
- 5 Funding difficulties – need for public/charity funding
- 6 Costs associated with running this type of facility within a listed building

Potentially Compatible Mix of Uses

- 9.34 The compatibility of a museum with residential and retirement/care home operators has been addressed in earlier sections of this report and it is considered that these could be accommodated within the Mansion House to achieve public access (with the exception of a care home where security and ‘quiet’ are key issues).
- 9.35 In relation to a museum’s compatibility with a hotel use, this has also been considered earlier in this report and given a hotel would be a ‘country house retreat’ and spa in a location such as this, it is not considered that these two uses would co-locate within the Mansion House.
- 9.36 A museum would be well-supported by a café. This would not provide any additional benefits in relation to public access and servicing would need to be carefully considered to limit impacts on the listed building fabric; however, it would support the viability of this museum/community use and encourage locals to visit this facility providing additional revenue.
- 9.37 Finally, a museum/community use could be considered compatible with a place of worship/religious institution. However, in this case the institution and museum would not be linked in any way, given there is no religious history to

the site and its significance relates to its history as a private residence and World War II. It is therefore unlikely that a religious institution would be willing to share the House with this use as there would be no affiliation and there may be conflicts with their times of worship, celebratory events etc. which could be difficult to manage. This would also clearly depend on the policies of the institution. We therefore consider that in this case, due to the lack connection with the site, it is unlikely the two uses would be considered compatible.

10.0 **Place of Worship / Religious Institution**

Summary of Use

- 10.1 The Council's Planning Statement refers to potential alternative community uses at the site within Use Class D1, including public worship or a religious institution.
- 10.2 Appendix 9 provides a plan showing how this use could be accommodated within the Mansion House with the potential for a new building to the west of the house which could accommodate a hall/room of worship; this is likely to be necessary given the restrictions of the room sizes in the Mansion House (and the issues related to opening these up given their historic significance). With this additional building, approximately 37,000sqft of D1 floorspace could be provided for this use, maintaining 224 dwellings on the rest of the site.
- 10.3 It is very difficult to quantify the level of floorspace/general space requirements for this use, given it is very specific to each religious organisation and their needs. This is therefore an estimate based on a logical approach to space requirements, but would vary depending on the occupier.

1. Design and Operational Considerations

- 10.4 The area that can be used within the main mansion once restored has a GEA of 33,339 sq ft and a GIA of approximately 29,773sq ft (depending on the divisions and requirements for internal walls, lifts and plant facilities).
- 10.5 The ground floor would be most suited to the main spiritual worship rooms (with the potential for a new building to contain a large worship hall) and a cafeteria for staff and worshippers, with servicing in the basement. There would also need to be a reception space. Consideration of DDA at ground floor area will need to be made as the en-filade rooms may be split into individual worship rooms that will prevent circulation through them and there is no level access to the Blue Room and Sassoon's bedroom/Kendrick's office at the eastern end. This is due to the insertion of the stairs and the requirement of the extra steps up and down from the ground floor landing. In addition, any religious occupier may want to open up the ground floor to provide a large space for worship; this would not be acceptable given the historic significance of these spaces and their fabric (hence the proposal for a new hall adjacent to the Mansion House for this purpose).
- 10.6 The access to the ground floors by the general public may be restricted due to the security issues and the quiet contemplation required within the worshipping spaces. In addition, a religious institution would have its own policies in relation to who can access and use the space and this could create some conflicts depending on individual's beliefs. This use could be exclusive to parts of the community and inclusive to others.

- 10.7 This use would likely require servicing within the basement, including catering and plant, and this may create a security and health and safety issue with allowing the public into the basement to view the World War Two rooms.
- 10.8 This type of use would provide the opportunity to understand and access the heritage value and history of the Mansion House and wider estate, subject to the policies of the religious institution in relation to access and use.
- 10.9 A new disabled access or ramp will need to be incorporated to the main entrance door to overcome the steps into the building.
- 10.10 The upper floors have been altered substantially over the years and there are issues of access due to the building's constraints. It is not possible to provide lift access to the mezzanine floors and full floors with horizontal access along each level. The upper floors may therefore need to be used on a more bespoke basis, perhaps as ancillary offices for the institution, or for their own specific purposes.
- 10.11 With the change of use come other aspects that require fulfilling and they include the requirement of structural loadings following a change of use. The following documents would need to be adhered to in accordance with Building Regulation A:
- a BRE Digest 366: Structural Appraisal of Existing Buildings, Including for a Material Change of Use, 2012
 - b The Institution of Structural Engineers Technical Publication Appraisal of Existing Structures (third edition), 2010
- 10.12 The access to the landscaped gardens and terrace immediately surrounding the Mansion House would be at the discretion of the Place of Worship and may be restricted, particularly if religious ceremonies are taking place. This could also have an impact on servicing and access at different times of the day and evening.

2. Planning Policy

- 10.13 Similar to other community uses/facilities (such as a museum), there is a policy requirement set out in the London Plan (policy 3.16) and local policy (Core Strategy Policy 11 and DMD 16 and 42) for social infrastructure to be accessible to all sections of the community (including the disabled) and located within easy reach by walking, cycling and public transport where there is access for physically impaired users and where there is no negative impact in relation to traffic generation.
- 10.14 As repeated for other uses, the site is not easily accessible by public transport and is a 15-20 minute walk from Oakwood and Cockfosters. It is likely that those attending the religious institution/place of worship would use the private car to come to the site, with the size of the congregation and the frequency of their activities dependant on the type of institution and their operational characteristics. To accommodate a large congregation (which

would necessitate a new-build hall of worship) a large car parking area would be required, particularly when ceremonies such as weddings are taking place.

10.15 In addition, the Mansion House (as set out above) has a number of issues in relation to accessibility for the physically impaired user. We would anticipate that the majority of religious institutions would want to be open and accessible to all in the community who share their beliefs. This could be accommodated within the new-build hall, but the house would present a number of challenges which would limit the space accessible to the disabled.

10.16 Finally, in relation to disabled access and the need for the museum/community use to be accessible to all, it is clear from the above design section that the entirety of the Mansion House cannot be made fully accessible due to restrictions of the historic fabric and its significance.

Heritage and Landscape Impacts

10.17 The impacts in this case would depend on the requirements for a new hall and what this would need to comprise (i.e. height, size, shape etc.) and the potential requirement for a secure enclosure around the entire demise of the religious institution. This would depend on the operator and their specific needs and requirements, which are very difficult to determine as they are so bespoke to that institution. If there was a need to enclose part of the landscape and segregate this from the wider estate management (for the placing of marquees for ceremonies etc.) then this would impact on the historic landscape and the setting of the site's heritage assets. Again, this is difficult to anticipate without knowing the specific occupier requirements.

10.18 Both of these issues could be resolved with sensitive design and an appropriate landscape and management strategy and there are not considered to be any significant issues in this regard.

Green Belt

10.19 There are unlikely to be any significant Green Belt issues with this proposal, subject to the scale of any ancillary hall space.

Social and Economic Impacts

10.20 Some employment may be created on site, but this would depend on the type of institution and the nature of their operation. This is therefore difficult to quantify, but is anticipated to be small-scale.

10.21 There would be social benefits for those who were part of this institution/shared in their religious beliefs. However, this use could also exclude others in the community.

Transport Impacts

- 10.22 It is unlikely that a place of worship/ religious institution would generate significant trips in the AM and PM weekday periods. It is more likely that this use would generate more significant weekend trips, when members of the congregation attend regular meetings/services at the site, or indeed at set times of the week. Given the varying nature and operational characteristics of these uses, it is difficult to determine trip rates and vehicle movements and there is no comparable data available for this purpose.
- 10.23 There is the potential for significant traffic generation for large ceremonies such as weddings and large religious festivals where high levels of demand for parking would be expected due to low accessibility to public transport, as well as an in-flux of people to site at set times.

3. Commercial and Viability Assessment

- 10.24 In addition to the alternative uses already discussed, the Planning Statement for Trent Park Campus states that the 'Council is open to discussing a variation as well as a combination of compatible land uses... that offer the appropriate scale of economic and high wage employment generating activity.'
- 10.25 Religious instruction within Use Class D1 for non-residential institutions is referenced in the Planning Statement and is discussed further here.
- 10.26 There are very few comparable buildings which are used for religious worship or institutional use akin to the Mansion House, with Bhaktivedanta Manor (formerly Piggott's Manor) in Aldenham, near Watford demonstrating an example of a similarly historic building which is now owned and run by the Hare Krishna movement. In this case, the property and 17 acres of land were donated by George Harrison to the movement in 1973 and since then, through further acquisitions there are now over 70 acres of land.
- 10.27 There are more recent transactions and lettings throughout the UK for this use, but where they are not occupying traditional places of worship, these have generally been of more traditional property asset classes, including converted office or industrial space, or public community spaces. They are also more concentrated towards central London and on average are usually up to around 10,000 sq ft in size.
- 10.28 Key drivers for independent religious organisations include proximity to London and good links with public transport, along with private land in addition to the buildings. Acquisitions are often based on the unique character of a building rather than from a traditional commercial perspective, so buildings which can be viewed as flagship for an organisation are preferred and the listed status is unlikely to have a negative impact. The size of the property is less important, although internally, many religious organisations will require a large hall for worship.

- 10.29 The nearest London underground stations to the property are Oakwood and Cockfosters, which are around 15-20 minutes' walk from the Mansion House, and while these distances are not unreasonable, these are considered fairly remote for this particular use. In addition, although there is a private estate surrounding the Mansion House, Berkeley is mindful that there is a requirement for the site to remain accessible to the local community in order to be enjoyed by future generations and this would be a deterrent to religious users.
- 10.30 With regard to investment levels required to convert the property, for many independent religious organisations, subject to the existing condition of the property, it is unlikely that significant levels of investment would be required, however, as aforementioned most users would require a large hall/room for worship.
- 10.31 In conclusion, it is highly unlikely that there would be any significant levels of demand for the Mansion House for religious and institution uses, as the property would be deemed too expensive and too remote from public transport. There were no offers made by religious institutions when the site was marketed in 2012 and 2015. Public access to the wider site in terms of the gardens being open for community use would also be a deterrent to any interested parties which would suggest that an alternative use would be more suitable.
- 10.32 We have not undertaken a viability appraisal for this use, because while transactions do take place, they are rarely, if ever, undertaken on a commercial basis as the purchaser is not seeking an investment return on the purchase price, but is seeking to gain a location to promote their particular beliefs. Acquisitions of properties for this use are totally dependent on benefactors who support their cause to provide long term funding, without the need for a return. Public accessibility to the site and restricted car parking would be a deterrent and there would be limited demand.

Summary

- 1 Issues of DDA access to the Mansion House – not accessible to all
- 2 Potential opening up of rooms/ floorplates on the ground floor required to accommodate a place of worship, or closing off ground floor rooms for more intimate areas of worship with associated access/circulation issues
- 3 Security will limit open public access to the Mansion House
- 4 Community access will depend on religion and policies of the institution – exclusive to some and inclusive to others. May require 'quiet' and tranquil spaces without open access
- 5 Parking required for all visitors/ the congregation due to remote location
- 6 The site is not within easy reach by public transport/ walking/ cycling
- 7 Limited impacts on the site's heritage and the Green Belt

- 8 Lack of demand for this use and very specific to the user – not a commercial operation

Potentially Compatible Mix of Uses

- 10.33 The issues of locating a museum and religious institution together within the Mansion House have been addressed earlier in this report. In summary, the institution and museum would have no affiliation, given there is no religious history to the site and its significance relates to its history as a private residence and World War II. It is therefore unlikely that a religious institution would be willing to share the House with this use and there may be conflicts with their times of worship, celebratory events etc. which could be difficult to manage. This would also clearly depend on the policies of the institution. We therefore consider that in this case, due to the lack connection with the site, it is unlikely the two uses would be considered compatible.
- 10.34 A religious institution could be compatible with the provision of a café within the Mansion House which could be 'open to all' to provide enhanced public access. This proposal would clearly depend on the policies of the institution and whether they would be willing to locate with this type of facility and associated issues of security/access, conflicts with quiet times of worship, ceremonies/celebrations etc.

11.0 Sport / Leisure

Summary of Use

- 11.1 The Council's Planning Statement refers to assembly and leisure uses at the site (Use Class D2) including recreation and halls. Clearly this would require space in addition to the Mansion House, and therefore the use of the house plus additional space on site has been considered for sports/leisure uses.
- 11.1 Appendix 10 sets out the following sport/leisure options for the site;
- 1 A sport/leisure centre based on the local Southgate Leisure Centre (53,000sqft of floorspace and 195,000sqft of outdoor space (including pitches), noting this would maintain approximately 224 dwellings on the remaining site); and
 - 2 A high-end sport/leisure club based on a smaller version of the Hurlingham Club in Fulham (97,000sqft of floorspace and 498,000sqft of outdoor space (including pitches), noting this would maintain approximately 200 dwellings on the remaining site).

1. Design and Operational Considerations

- 11.2 The proposals for a leisure facility as set out at Appendix 10 are based on established comparable built examples within the Greater London area. The sizes of proposed buildings, requirements for associated leisure facilities etc. all follow the principles set out in these examples.
- 11.3 The proposal would need to be sited in an area that works with the site's topography and is open and suited to this use. In addition there is a need to locate the associated facilities as close to the Mansion House as possible so this facility would work operationally. As a result of this, the example layouts include areas where the greatest potential improvements to the landscaping which are proposed for the public's enjoyment. These would however have to be secured and would therefore be closed to the wider public to ensure that the security of these high end facilities could be maintained.
- 11.4 The ground floor of the Mansion House would likely include the main studio and gym spaces and a possible cafeteria. There will need to be a reception space and a new disabled access or ramp will need to be incorporated to the main entrance door to overcome the steps into the building. Access to these spaces within the Mansion House will be restricted to those who are registered as members of the leisure/sports club and those who are seeking to partake in these activities. Depending on the type of provision, this could vary considerably in relation to affordability and exclusivity, not only in the cost of membership/use (which would likely be high to cover the costs of this facility) but also in relation to number restrictions on membership and potential for 'waiting lists' depending on popularity (which operators often want to create to increase the site's perceived quality). It is likely that access

to the Mansion House will need to be strictly controlled to ensure the security of gym and other equipment.

- 11.5 Consideration of DDA at ground floor area would need to be made as the enfilade rooms would likely need to be split into individual studio rooms that would prevent circulation through them and there is no level access to the Blue Room and Sassoon's bedroom/Kendrick's office at the east end. This is due to the insertion of the stairs and the requirement of the extra steps up and down from the ground floor landing. This would create issues of level access and the need for a sport/leisure facility to be accessible by all in the community.
- 11.6 The restoration of the historic finishes at ground floor is being undertaken through full paint and wall paper analysis by specialists in their fields, Patrick Baty and Alyson McDermott. Once complete these rooms will need to be maintained and protected as they will form part of the Listed Building Consent/Application.
- 11.7 The upper floors have been altered substantially over the years from the raising of the rear principal ceilings in the north facing enfilade rooms by Sassoon to the insertion of large steel beams to increase the possibility of floor loadings. The most substantial floor change is between the Victorian wing and the main floors which causes an issue with the suitability of the placement of lifts to mezzanine floors/full floors and the issues associated with lift installation for vertical circulation. Even if lifts were to be accommodated with interventions to the historic fabric, there are issues of horizontal circulation at first and second floors and the corridors have step changes, restricting DDA access throughout.
- 11.8 With the change of use come other aspects that require fulfilling and they include the requirement of structural loadings following a change of use. The following documents would need to be adhered to in accordance with Building Regulation A:
- 1 BRE Digest 366: Structural Appraisal of Existing Buildings, Including for a Material Change of Use, 2012
 - 2 The Institution of Structural Engineers Technical Publication Appraisal of Existing Structures (third edition), 2010
- 11.9 The structural loading and sprung floors required of studio and gym spaces will have a detrimental impact on the historic fabric. The likelihood of meeting the building regulations for a code to meet this use class would mean that there would need to be more structural loading capacity and acoustic requirements. The addition of a greater amount of electrical requirement for the machines and AV equipment is also likely have a detrimental impact on the historic fabric.
- 11.10 The servicing of the mansion as a sports facility will require a much higher level of service vehicles, more refuse collections, laundry collections and more car parking facilities for staff and visitors than would be required for

residential. A health club would attract significant numbers who would arrive on site, in the majority, by private car and large parking areas would be required to accommodate this.

- 11.11 In addition, it is considered that the use of the Mansion House, its terrace and the swimming pool/Orangery as part of a large leisure facility could result in damage to the historic finishes through the intensification of activity and as a result of temperature fluctuations from the associated uses.
- 11.12 Finally, in relation to the facilities required to support a leisure/sport facility, there will likely be a requirement for pitches such as tennis, hockey football and/or rugby, some of which would require artificial surfaces.

2. Planning Policy

- 11.13 London Plan and local policy requires that social infrastructure is accessible to all sections of the community (including the disabled) and located within easy reach by walking, cycling and public transport, where there is access for physically impaired users and where there is no negative impact in relation to traffic generation.
- 11.14 Further to similar assessments set out in relation to a museum/community use and religious institution/place of worship (which are also 'social infrastructure' or 'community facilities' and apply to this alternative use, including issues of sustainable inclusive access and traffic generation/parking at the site) a sports/leisure use has other policy implications.
- 11.15 As set out under London Plan Policy 3.19, proposals for new sport/recreation facilities will be supported, but where they are proposed on existing open space they will need to be considered carefully in light of policies on Green Belt and protecting open space as well as the borough's own assessment of needs and opportunities for both sports facilities and for green multifunctional open space. Local policy DMD74 (playing pitches) also states that artificial grass pitches will only be allowed subject to certain criteria (such as 'very good accessibility by public transport' and 'level ground') and that applications for artificial pitches that incorporate flood lighting in the Green Belt will be refused unless justified through very special circumstances.
- 11.16 The site falls outside of an identified 'open space' boundary under local policy, although it is enclosed by it and it sits within the Green Belt. It is not considered that in relation to playing pitches, the site is in a location which meets the policy tests of the Development Plan. In addition, in this type of location it is highly likely that any operator would require the outdoor facilities to be floodlit to allow year-round use, which would have associated Green Belt impacts.

Heritage and Landscape Impacts

- 11.17 The buildings that would be required to house the sporting facilities (such as indoor courts, halls, swimming pool etc.) are by their nature large buildings,

with a considerable footprints, depth and heights and with limited opportunities to articulate and break up the façade, creating variation and articulation. These buildings would have a considerable impact on the setting of the Mansion House and other listed building son site, as well as the wider historic landscape.

- 11.18 The landscape which would be required by this use would necessitate large areas to be levelled with associated tree removal and there would be significant impacts on the ability to restore the site's historic landscape. This would be an issue created by the buildings themselves but particularly the outdoor pitches and their detailed requirements. From a review of the site's topography and character, it is not considered that this use could appropriately be incorporated into the landscape without impacting on its historic significance.
- 11.19 The sports club would also require a secure boundary to prevent any member of the public accessing and using the facilities, particularly given the open access to the wider Trent Country Park, the proposals for the rest of the site to be open to all and the proposed adjoining residential use. This would likely comprise a fence enclosure or similar. As was set out for the office park and education uses, this boundary treatment would have potential impacts on the setting of the listed buildings and historic landscape as follows:
- 1 The purpose of a secure perimeter would be to prevent public access; this would vary in extent depending on the scale of the club and its facilities, but would in both cases prevent open access to the house and its immediate surroundings. In relation to a larger high-end club, this would prevent public access to a significant portion of the site including key areas of the historic landscape. This proposal would have limited public benefits and would not integrate the site into the wider Trent Country Park but further segregate it.
 - 2 The introduction of a secure boundary with associated signage would have a detrimental impact on the wider landscape restoration strategy (given part of it would be sectioned off for another use) and potentially the setting of the Mansion House (depending on the character of the boundary material/height etc.).
 - 3 By sectioning off part of the landscape for a very different use to residential, this will have associated impacts on its future management and maintenance due to differing needs and demands, as well as funding streams. This will create complexities when seeking to achieve a comprehensive historic landscape restoration and ongoing maintenance strategy, which is key to the success of this sensitive site.
 - 4 Artificial surfaces and associated floodlighting/high fencing (such as that needed around tennis courts) will impact on the setting of the site's heritage assets and their character.
- 11.20 Whilst a sports/leisure facility is suited to a rural parkland setting we do not consider it would be suited to this Green Belt location which contains a number of significant heritage assets within a complex historic landscape. A

smaller facility, focused within the Mansion House/swimming pool/Orangery, could be more suited to this site to ensure the impacts are acceptable.

Green Belt

- 11.21 In addition to the issues set out above in relation to the building footprints which would impact on the openness of the green belt, significant car parking areas would be required on site (due to its location) including the potential for coach drop-offs/waiting areas etc. Further to this, the key Green Belt issue relates to floodlighting and pitch enclosures, which would be required in a rural and 'dark' location such as Trent Park which is also connected to a public Country Park. Whilst para. 89 of the NPPF supports the provision of appropriate facilities for outdoor sport and recreation in the Green Belt (as long as it preserves its openness) there is a policy presumption against artificial pitches with flood lighting; these features would alter the character of this rural location and external floodlighting would impact on the site's heritage assets and ecology.

Social and Economic Impacts

- 11.22 A sports/leisure facility will create employment on site with associated economic benefits. It could also have educational benefits if it was a facility open for school use and the training and development of young people.
- 11.23 There will be a number of social benefits in relation to health and wellbeing by providing a new health club on site. However, this will depend on the type of operator; a leisure centre such as that in Southgate would be open to all, but to generate the funds required for a site such as Trent Park, it is likely to be a high-end private members club which would be exclusive to the majority of the community. This would therefore limit public access to the Mansion House and the proposed use would not be 'open to all'.

Transport Impacts

- 11.24 There is a lack of comparable data to determine accurate vehicular trip generation figures for a comparable sports / leisure facility, but it is noted that significant parking areas are likely to be required for visitors due to the site's location and the nature of potential activities (for example, where equipment is needed such as tennis).
- 11.25 Trip generation will be fairly consistent throughout the day, but particularly AM and PM peak periods where people use the gym/pool etc. before and after work. There would also be significant trips throughout the weekend on both Saturday and Sundays, depending on the hours of operation.

3. Commercial and Viability Assessment

- 11.26 An alternative use for the Mansion House could be as a gym/fitness facility (use class D2). We have considered this option firstly by reviewing the performance of the leisure sector as a whole, then specifically the health and

fitness sector. We have examined similar gyms in the local area and analysed the facilities required for this use class. We have then considered the suitability of the Mansion House as a health and fitness centre, having regard to its specific attributes and constraints.

- 11.27 The picture for the leisure sector in the UK is positive and the combination of improving household incomes and consumer confidence will continue to drive this. Tenant demand is strong in the cinema, restaurants and health and fitness sectors, and investors are becoming increasingly broad based in a sector which is no longer considered as niche. The UK health and fitness industry has more clubs, more members and a greater value than ever before. The industry has experienced strong growth over the past few years, with memberships on the rise and occupiers expanding, and this trend is expected to continue.
- 11.28 Since 2012 there has been a major structural change in the health and fitness sector, with the rise of the budget gym. Occupiers such as The Gym and Pure Gym have seen rapid growth, and franchisee Anytime Fitness plans to open 700 stores in the UK in 2016. This change has led to a large range of membership costs, which can now range from £20pcm at the budget end, to over £100pcm at the higher end. As a result, middle ground players are being forced to either increase prices and offer more, or lower their prices enough to compete with the budget gyms. There have also been an increasing number of specialising independent operators and popup concepts entering the market, who focus on innovative and dynamic ways of keeping fit, such as spin clubs and boot camps.
- 11.29 Although the success of the new budget gyms is clear, there is evidence that the luxury customer is still willing to spend the money to support the likes of David Lloyd and Virgin Active, which are higher end Health and Fitness Centres.
- 11.30 The budget gyms that are cropping up also have quite specific requirements for space, usually favouring town centre locations with good public transport connections. Many choose to set up in old office buildings, with minimal fit-out to keep costs down. The Mansion House is not considered to be a suitable location for a budget gym, as its public transport connections are relatively poor and the likelihood is that it would need a higher standard of fit-out to fully transform the interior. We suggest that it would be a more suitable location for a high end Health and Fitness centre, which could also offer other facilities such as a spa, pool and restaurant. Unlike other uses, this would fully utilise the space available and offer a unique gym in a historic setting which could differentiate itself from the competition and in turn demand higher membership fees.
- 11.31 There are two high end gyms in Enfield, Virgin Active and David Lloyd, however both of these are at least four miles away and there is potentially room for another competitor. Both these gyms offer extra facilities including an indoor and outdoor pool, spa, tennis court, hair and beauty salon and

restaurant. The Mansion House does have the potential to compete and to outperform, but to do so it would need a unique offer.

- 11.32 Trent Park is already widely used by the public for its sports and leisure facilities which include an Equestrian Centre, Public Golf Course, Hockey Club, and Tennis Courts. The presence of these existing amenities at the park reduces the demand for a new sports and leisure facility in this location, and limits the scope for a potential new operator to differentiate itself.
- 11.33 Further, there are a number of important obstacles to demand from high end gym/leisure operators. The first is the high capital cost associated with the conversion of the listed buildings, as well as the ongoing costs of maintaining these buildings. It is likely that both the costs of conversion works, and the risk associated with converting listed buildings, would deter some operators.
- 11.34 In addition, although the presence of two high end gyms in the area demonstrates that there is a strong market in Enfield, there is likely to be concern about potential oversupply, as well as the issue of the existing provision within Trent Park.
- 11.35 We expect that the Mansion House could deliver a smaller, high end fitness facility, but that a larger leisure facility would not be appropriate in this location. However, the viability of a smaller high end scheme would be tempered by the high cost of conversion, along with the ongoing maintenance responsibility for the heritage asset. This would undoubtedly deter potential occupiers.
- 11.36 In order to convert the Mansion House from its current use to a gym/fitness centre, BCIS quotes comparables of £986 psm for a median rate, and £1,425 psm as the highest rate. If a swimming pool is included then it is estimated that these figures could rise by at least 65%-95%. These figures do not take into account challenges associated with adapting a listed property for this use. In JLL's view the likely cost of conversion for a high end leisure facility could be significantly higher.

Summary

- 1 Issues of DDA access to the Mansion House (not accessible to all) and issues of floor loadings to accommodate sports equipment etc.
- 2 Significant parking required for visitors due to poor public transport accessibility – not within easy reach by public transport/ walking/ cycling
- 3 New buildings required with large floorplates and a need for outdoor fenced courts (some artificial surfaces) likely with some floodlighting will impact on Green Belt
- 4 Perimeter of the leisure complex site will need to be fenced/ secured which will limit public access to the landscape
- 5 Commercially there is demand but likely to be a high-end facility due to location and viability – issues of exclusivity based on costs of membership

- 6 Potential damage to the historic finishes through the intensification of activity and as a result of temperature fluctuations
- 7 Social and economic benefits – community facility and job creation

Potentially Compatible Mix of Uses

11.37

The full range of potentially compatible uses within the Mansion House has been considered under earlier sections of this report. However, to summarise it is considered that a small-scale leisure/sports facility (i.e. the swimming pool, a gym and studio space in the Orangery and Ground floor room(s) of the Mansion House) could be accommodated alongside the following additional uses:

- 1 Residential (for residents and potential for paying members)
- 2 Hotel (focused on hotel guests but open to spa day packages)
- 3 Retirement Home (for residents and potential for paying members)
- 4 Café (ancillary to leisure use)

12.0 Implications of Alternative Uses

- 12.1 LB Enfield's approach to Major Developed Sites in the Green Belt is set out under Core Policy 33:
- "Middlesex University's Trent Park campus and the Picketts Lock leisure complex are identified as Major Development Sites within the green belt, the boundaries of which are shown on the Proposals Map. Where existing uses become redundant, the Council will work with partners to prepare planning briefs or masterplans in order to guide appropriate future development that preserves and enhances the character of the green belt".*
- 12.2 To support this, the Council prepared its Trent Park Planning Statement in 2012 (as referenced throughout this report) as there was not sufficient time to prepare a planning brief before the University vacated the site. It was therefore confirmed in this statement that any future owner should prepare a comprehensive masterplan for the Campus, in accordance with Policy 33, to secure the community and heritage value of this important site.
- 12.3 Berkeley's approach to this site has focused on the need for a comprehensive scheme which will conserve and enhance the site both now and in the future. Unlike the majority of housebuilders/developers, Berkeley does not sell off its sites but maintains an overarching management role; it therefore has a short, medium and long-term interest in the site and its success. To secure this, a comprehensive approach is critical and the proposed masterplan, based on a residential-led scheme with a community use, allows them to implement this approach.
- 12.4 As has been consistently referenced throughout this AUR, there are significant issues associated with a number of these alternative uses in relation to site fragmentation and the need to demarcate and secure the different uses. This would then generate different maintenance and management requirements to the remaining residential development on site, and in effect split the landscape and the historic buildings into various parts. For instance, with a leisure operator or office park occupying part of the site, and residential on the remainder, Berkeley would manage their residents but would have limited control over the landscape maintenance strategy/building conservation on land within the control of others. There would also be competing requirements for this land; whilst Berkeley might want the historic landscape restored and sensitively maintained for the benefit of its residents, with a good level of permeability, a sport/leisure operator will require the landscape to perform a commercial function and will adapt it to meet their operational requirements.
- 12.5 These types of users will also seek to secure their boundary from public access and there will be a change in character between these public and private areas. There is a significant risk that, as a result, the site could lack a unifying character with the proposed links to the wider Trent Country Park.

- 12.6 In addition, the existing heritage assets on site, comprising the Grade II Listed Mansion House and the 'landmark' stables building, along with the buildings of merit (for example, The Dower House and the Gardener's Cottage) are all residential in character and were originally built for residential purposes. Therefore, it can be concluded that additional residential buildings, of a similar scale and materials, would best complement their character and settings. Mixing the building typologies with the large floorplates of an office park or the large sport halls/pitches necessary for a leisure centre can only be concluded to be less suited to this sensitive site.
- 12.7 It is important to note that it is not just community access to part of the Mansion House which we consider to be important in this case. The site's landscape is also of great significance and it has fallen into disrepair over the last 50 years. Its restoration for the public benefit would be a significant public benefit, providing open access for the community's enjoyment. This would be difficult to achieve with a number of the alternative uses, and is best-suited to a comprehensive approach which secures not only the short-term capital required but also the long-term revenue generation for its management. Bringing in a third party, such as a religious institution, large-scale national museum or leisure operator, could put this strategy at risk as there would be differing demands on this landscape and the historic buildings.
- 12.8 It can therefore be concluded that the most successful approach to a comprehensive masterplan which will offer benefits both now and for the future is to secure one owner and operator who is responsible for a comprehensive approach to the site's maintenance and management, both in relation to its built heritage and the historic landscape. None of the alternative uses, with the exception of a 'over 55s' retirement home (which is very similar to C3 residential) would permit this approach to the same extent as is proposed.
- 12.9 Finally, in relation to the Mansion House itself, as was set out earlier in this AUR, the most appropriate use for a heritage asset is usually the one for which it was originally designed; in this case, residential. All the other uses may provide some limited community access but they all require more significant interventions into the building's historic fabric, in particular to provide level DDA access which is a requirement of any community facility or social infrastructure and generally greater impacts in terms of vehicle servicing requirements. It is therefore considered that the most appropriate way to address this is to provide residential apartments in the majority of the building, but provide a complementary and compatible use within part of the house to ensure it can be enjoyed by the public for the first time in its history. As set out, this could comprise a museum/community rooms, potentially with an ancillary café space, or alternatively a small-scale health club. This would best achieve the two key criteria for this site: secure public access and limit the interventions required within the listed Mansion House.
- 12.10 In addition, as set out by JLL, the value that can be generated on the basis of a residential use is higher than that of each of the Alternative Uses assessed

in this Report which is key to securing the initial capital costs of restoration. On an on-going basis, this use will also be best placed to meet the costs of protecting and maintaining the site's heritage assets.



13.0 Conclusions

13.1 For the purposes of this report, it can therefore be concluded that the following are considered appropriate uses for the Mansion House at Trent Park:

- 1 Residential
- 2 Retirement Home/village
- 3 Small-scale leisure (part of Mansion House)
- 4 Small-scale museum (part of Mansion House)
- 5 Ancillary café (part of Mansion House)

13.2 The remaining uses are considered to either restrict public access by the nature of their operations and/or require more significant interventions into the historic fabric of the Mansion House due to DDA requirements, structural loadings etc.:

- 1 Office/HQ
- 2 Hotel
- 3 Educational (primary/secondary/SEN)
- 4 Religious institution
- 5 Sport/leisure facility (entire house)

13.3 In addition, there is an absence of market demand for office uses in this location and a lack of current demand for an educational facility.

13.4 It is therefore the findings of this Alternative Uses Report that the Berkeley proposals for Trent Park should seek to provide residential (Use Class C3) or retirement home/village (Use Class C2) within the Mansion House, but ensure this includes some provision for community access by way of a small scale museum, health/leisure facility and/or café space in the ground floor room(s). This would also support the wider landscape restoration strategy, providing a comprehensive site-wide response which restores the site's history and opens it up to wider public understanding.

13.5 The justification for the use of the wider site for residential use will be set out in detail in the Planning Statement, given the focus of this AUR was on the Mansion House, or the Mansion House plus additional where this would be necessary for the operational requirements of that use.

Appendix 1 Strategy Note (23 March 2016)



Strategy Note

Our ref 14713/IR/DPa
Date 23 March 2016
To LB Enfield
From Nathaniel Lichfield & Partners
Copy Berkeley Homes (North East London)

Subject Trent Park, Alternative Uses: Proposed Scope and Methodology

1.0 **Introduction & Background**

1.1 This strategy note has been prepared on behalf of Berkeley Homes (North East London) to outline the proposed methodology for a high level assessment of alternative uses to residential within the Mansion House at Trent Park. It has been prepared following pre-application discussions with LB Enfield and to act as a means of agreeing the proposed alternative uses to be considered and the quantitative and qualitative methodology for the assessment with officers.

1.2 During pre-application discussions the Council's Conservation Officer has indicated that public access should, where feasible, be to the three principal ground floor rooms within the Mansion. Some form of access to the Mansion House has also been a key objective of local community and stakeholder groups and has reflected general public feedback from the public consultation events held in December 2015 and February 2016.

2.0 **Alternative use to be Considered**

2.1 A key starting point for the identification of alternative uses is the Trent Park Planning Statement (July 2012) which was prepared to set out the Council's views on the future of the site and to provide the basis for considering future land use option. Key priorities include securing an appropriate long term use for the site that delivers the protection and enhancement of both the site's built and landscape heritage.

2.2 The following alternative uses are identified in the Planning Statement for the Mansion House and the surrounding site:

- 1 Office / headquarters / research and development (Use Class B1)
- 2 Hotel / conference centre (Use Class C1)
- 3 Retirement home / older care accommodation (Use Class C2A)
- 4 Primary and/or Secondary school (Use Class D1)

5 Museum (or similar community type use) (Use Class D1)

3.0 **Methodology for assessing the alternative uses**

3.1 We propose to carry out a qualitative and quantitative assessment of each of these uses against the following topics:

- 1 Planning policy;
- 2 Commercial market and viability; and,
- 3 Design and Operational Considerations.

3.2 The scope of each of these topic areas is set out in further detail below.

Planning Policy

3.3 We will assess each of these uses against the statutory development plan including the London Plan (2015), Enfield Core Strategy and Development Management DPD. This would include an assessment of:

- 1 The compliance of the alternative use in land use designation terms and policies in the statutory development plan.
- 2 The impact of the use on the Grade II heritage asset and Green Belt.
- 3 The impact on the wider Trent Park Country Park.
- 4 The impact of the use on transport and accessibility.
- 5 Evidence of supply and demand for this use in this location in the Borough.
- 6 The social and economic impacts of the alternative use in terms of employment creation and on local services.

Commercial and Viability Assessment

3.4 Berkeley would instruct commercial agents and gather information from the commercial agents that have previously marketed the site to provide feedback on:

- 1 The marketing of the site and interest from alternative use providers.
- 2 The supply and demand for the alternative use in this location.
- 3 The level of investment and / improvement required to convert the Mansion House to the proposed use. Where appropriate, a comparison with other employment / similar sites.
- 4 The ability of the proposed use to manage and sustain the heritage asset and surrounding historic landscaping from a viability perspective.

Design and Operational Considerations

- 3.5 Berkeley would instruct the project architects to prepare some general feasibility options to understand whether:
- 1 The building can be converted to the alternative use and impact of this from a historic building and conservation perspective.
 - 2 The alternative use would permit continued public access across the site.
 - 3 The alternative use could be accommodated within the Mansion House to allow public access to the three principal ground floor rooms within the Mansion and the impact on the internal fabric of these rooms.
 - 4 The proposed alternative use will provide an opportunity to understand and access the heritage value and history of the Mansion House and wider estate.
 - 5 The alternative use could comply with building regulations for that use.
 - 6 Servicing and operational requirements

4.0 Next Steps

- 4.1 In advance of preparing the assessment of alternative uses, officer feedback and the agreement of methodology and scope of the assessment is required by Berkeley Homes prior to commencing the preparation of the alternative uses assessment.
- 4.2 A report will be prepared which draws together each of the topic areas and proposed an assessment of each of the proposed alternative uses. This would be issued to LBE in advance of a pre-application meeting (or separate sub-session).

Appendix 2 Alternative Uses Summary Matrix

Former Middlesex University Campus Site, Trent Park: Matrix Setting out Mix of Potential Alternative Uses (24 May 2016)

Proposed Use	Location of Proposed Use		Potentially Compatible Additional Use within the Mansion House*								
	Mansion House Only	Mansion House and Additional Buildings	Residential	Office/HQ/R&D	Hotel	Retirement/Care Home	School (various)	Museum	Place of Worship	Sport/Leisure	Cafe
Residential		✓	✓					✓		✓	✓
Office/headquarters/research and development		✓		✓	✓					✓	✓
Hotel	✓	✓			✓			✓		✓	✓
Retirement home/older care accommodation	✓	✓				✓		✓		✓	✓
Primary School	✓						✓				
Secondary School		✓					✓				
SEN School		✓					✓				
Museum or Community Use	✓		✓		✓	✓		✓	✓		✓
Place of worship/religious institution	✓	✓						✓	✓		✓
High-end sport/leisure		✓	✓	✓	✓	✓				✓	✓

* This table considers compatible mixed uses within the Mansion House with the assumption that any remaining built footprint on site (in addition to the proposed use(s) which require buildings/land beyond the Mansion House) is residential in nature.

Appendix 3 WSP Alternative Uses Transport Impacts Table

Table Error! No text of specified style in document.-1 Alternative Land Use Information

Land Use	Area	Vehicular Trip Generation (Two Way) *1			Resultant Residential Vehicular Trip Generation (Two Way)			Total Development Vehicle Trips / Net Change In Trip Generation (from residential only scheme)			Car Parking Standard	Car Parking *2	Cycle Parking Standard		Cycle Parking Numbers	Trip Generation Assumptions
		AM Peak	PM Peak	Daily	AM Peak	PM Peak	Daily	AM Peak	PM Peak	Daily			Long Stay	Short Stay		
Residential	131 Houses 114 Flats	184	84	1088	N/A			N/A				412	1 space per 1 bed unit, 2 spaces for all others	1 visitor space per 40 units	478	N/A
B1 Office – Option 1 – Small / Headquarters Research and Development	45,781 sqft / 4,253 m ²	45	48	338	170	78	1002	215 +31	126 +42	1340 +252	1 space per 100-600m ² of gross floorspace (GIA (20% active electric 10% passive)	29	1 space per 150 sqm	first 5,000 sqm: 1 space per 500 sqm - thereafter: 1 space per 5,000 sqm		Will result in removal of 16 apartments and 5 houses NIA assumed to be 70% of GEA Staff assumed to be 1 person per 12.5m ² of NIA Visitors assumed to be 0.3 per 100m ² of NIA 85% staff attendance due to sickness / leave / working from home etc 80% of total people office trips assumed to be by car
B1 Office – Option 2 – Large / Headquarters Research and Development	314,500 sqft / 29,218 m ²	308	332	2323	48	22	286	356 +172	354 +270	2609 +1521	1 space per 100-600m ² of gross floorspace (GIA (20% active electric 10% passive)	194	1 space per 150 sqm	first 5,000 sqm: 1 space per 500 sqm - thereafter: 1 space per 5,000 sqm		Will result in removal of 109 apartments and 72 houses NIA assumed to be 70% of GEA, Staff assumed to be 1 person per 12.5m ² of NIA, Visitors assumed to be 0.3 per 100m ² of NIA. 85% staff attendance due to sickness / leave / working from home etc. 80% of total people office trips assumed to be by car
Hotel (C1)	33,339 sqft / 3,097 m ² Plus 9,688 sqft / 900m ² (west wing)	55	44	739	170	78	1002	225 +41	122 +38	1741 +653	PTAL of 1–3, provision, objectives to reduce congestion and traffic levels. avoid undermining walking, cycling or public transport. one coach parking space per 50 rooms		1 space per 20 bedrooms	1 space per 50 bedrooms		Will result in removal of 16 apartments and 5 houses 80% of total people hotel trips assumed to be by car
C2 Retirement Home / Older Care Accommodation	68,800 sqft / 1,064m ²	17	13	261	136	62	805	153 -31	75 -9	1066 -22	No standard	35	1 space per 5 staff	1 space per 20 bedrooms		Will result in removal of 27 apartments and 38 houses 80% of total people trips assumed to be by car
Primary School (D1)	11,456 sqft / 1,064m ² 597 pupils	294	7	955	170	78	1002	464 +280	85 +1	1957 +869	No standard (1 space per 100 students & 1 per 8 teachers) – As advised by architect	40				Will result in removal of 16 apartments and 5 houses 597 pupils assumed based on average of Grange Park Primary School N21, George Spicer Primary School EN1 & Merryhills Primary School EN2. 95% attendance for staff 80% of total people trips assumed to be by car for pupils
SEN School	11,456 sqft / 1,064m ² 130 pupils	83	2	268	170	78	1002	253 +69	80 -4	1270 +182	No standard		1 space per 8 staff and 1 space per 8 students	1 space per 100 students		Will result in removal of 16 apartments and 5 houses Trip generation based on 130 pupils 95% attendance for staff
Secondary School Option 1 - All Age Up to 750 pupils	18,000 sqft / 1,672m ²	225	39	855	170	78	1002	395 +211	117 +33	1857 +769	No standard					Will result in removal of 16 apartments and 5 houses. Trip generation based on 750 pupils 50% of total people trips assumed to be by car for pupils. 95% attendance for staff

Secondary School (D1) Option 2 – Based on Local Example (1538 pupils)	175,000 sqft / 16,258m ²	411	71	1564	All residential trips removed	+227	-13	+476	No standard	No details				Removal of all apartments and houses Trip generation based on 1538 pupils 50% of total people trips assumed to be by car for pupils. 95% attendance for staff
Museum (D1)	33,339sqft / 3,097m ² (Mansion House)	Significant 'national' museum would require a large number of trips to make viable							No standard	5	1 space per 8 staff	1 space per 100 sqm		Loss of apartments dependent on museum size.
Place of Worship / Religious Institution (D1)	28,306 sqft / 2,630m ² plus 3,767sq.ft / 350m ²	Minimal weekday trips – Sunday / weekend services assumed			170	78	1002		No standard		1 space per 8 staff	1 space per 100 sqm		Will result in removal of 16 apartments and 5 houses Minimal weekday trips – Sunday / weekend services assumed
High End Sport / Leisure (D2) – Option 1 - Small		Limited comparable data available			170	78	1002		No standard		1 space per 8 staff	1 space per 100 sqm		Will result in removal of 16 apartments and 5 houses
High End Sport / Leisure (D2) - Option 2 – Large		Limited comparable data available			151	69	894		No standard		1 space per 8 staff	1 space per 100 sqm		Will result in removal of 16 apartments and 29 houses

*1 London sites have low car level, where this occurs total person trips used and a percentage assigned to determine car mode share.

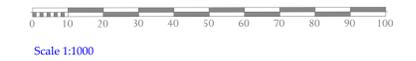
*2 Parking numbers taken from architects plans

Appendix 4 B1 Office Use Layout Options



Office Park & Mansion	
Site Area*	+/- 609,000sf
Full Mansion House Area for office use	: 28,306sf GIA
Stables area for office use:	: 13,235 GIA
Proposed Office Park:	+/- 273,000sf GIA
	at 3 Storeys
Total Office Park & Mansion:	+/- 314,500sf GIA
Total New Building Footprint:	+/- 93,000sf
Parking:	194+ spaces provided at 1space/150m2
Resi units removed -	109 Apartments
	72 Houses
Total Removed -	181

Adjacent Properties and Boundaries are shown for illustrative purposes only and have not been surveyed unless otherwise stated.
 All areas shown are approximate and should be verified before forming the basis of a decision.
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 Ground Floor Slabs, Foundations, Sub-Structures, etc. All work below ground level is shown provisionally. Inspection of ground condition is essential prior to work commencing.
 Reassessment is essential when the ground conditions are apparent, and redesign may be necessary in the light of soil conditions found. The responsibility for establishing the soil and sub-soil conditions rests with the contractor.



- Application Boundary
- Alternative Use Site Area and Boundary
- Proposed Building
- Mansion with Alternative Use
- Proposed Parking
- Fence

- Issues that will have an impact on the mansion historic fabric (full mansion house):
1. Provision of sufficient WC and washroom facilities on each floor (ground, first and second floors)
 2. Some sub-division of the larger rooms may be required?
 3. Integration of services: data, heating, lighting, ventilation, etc.
 4. MoE: requirements and subsequent constraints due to historic fabric.
 5. Floor levels: existing changes in level between spaces may need to be addressed.
 6. Door widths for access (widening may be required): internal and external.
 7. Lift for access to upper floors: potentially two lifts (service and public)
 8. General DDA constraints and requirements.
 9. Structural loading due to increased equipment and use.
 10. Restricted public access.

A 27/5/16 Impact on mansion added; gen. amendments to site layout and revised areas.
 Rev Date Description Initials

PROJECT Trent Park

TITLE: Alternative Uses - Office Park

SCALE: 1:1000 @ A1

DATE: May / 2016

DRAWING No: 5902/SK/127A

DRAWN BY: ATM



OLD HYDE HOUSE, 75 HYDE STREET
 WINCHESTER, HAMPSHIRE, SO23 7DW
 TELEPHONE: 01962 843843 FACSIMILE: 01962 843303
 www.adamarchitecture.com contact@adamarchitecture.com

LONDON OFFICE: 6 QUEEN SQUARE, WC1N 3AT
 TELEPHONE: 020 7841 0140 FACSIMILE: 01962 843303
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B1 offices
 Site Area - +/-70,000sf
 Total Building Area - Mansion -28,306sf
 West Wing- 17,475sf
 Parking - 29 spaces
 provided at 1 space per 150sqms

Resi units removed - 16 Apartments
 5 Houses
Total Removed - 21

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 Ground Floor Slabs, Foundations, Sub-Structures, etc. All work below ground level is shown provisionally. Inspection of ground condition is essential prior to work commencing.
 Reassessment is essential when the ground conditions are apparent, and redesign may be necessary in the light of soil conditions found. The responsibility for establishing the soil and sub-soil conditions rests with the contractor.



- Scale 1:1000
- Application Boundary
 - Alternative Use Site Area and Boundary
 - Proposed Building
 - Mansion with Alternative Use
 - Proposed Parking

Issues that will have an impact on the mansion historic fabric (Basement, Ground and First Floor only):

1. Risk of damage to historic finishes through high intensity use.
2. Division of space and reception area may need to be considered and would likely affect the historic fabric.
3. Provision of sufficient staff and worshipers facilities: including WC, wash room/changing facilities and welfare areas on the ground floor.
4. Integration of services: data, heating, lighting and ventilation systems etc.
5. Addition of catering and servicing facilities and associated services.
6. MoE: requirements and subsequent constraints due to historic fabric.
7. Lift access between basement and first floor mezzanine level only possible without removing corridor at ground and basement level.
8. Floor levels and existing floor finishes: existing changes in level between spaces will need to be addressed and new floor finishes added.
9. Secondary glazing to protect existing windows.
10. Door widths for access: internal and external.
11. Level access to main entrance.
12. General DDA constraints and requirements.
13. Structural loading due to increased equipment and use.
14. Potential Restricted public access.
15. A large kitchen and service offices area within the basement may be required and will restrict access to this area.

Rev	Date	Description	Initials
A	31/5/16	Mansion impact notes added	KN

PROJECT Trent Park

TITLE: Alternative Uses - Small Office

SCALE: 1:1000 @ A1

DATE: May / 2016

DRAWING No: 5902/SK/149A

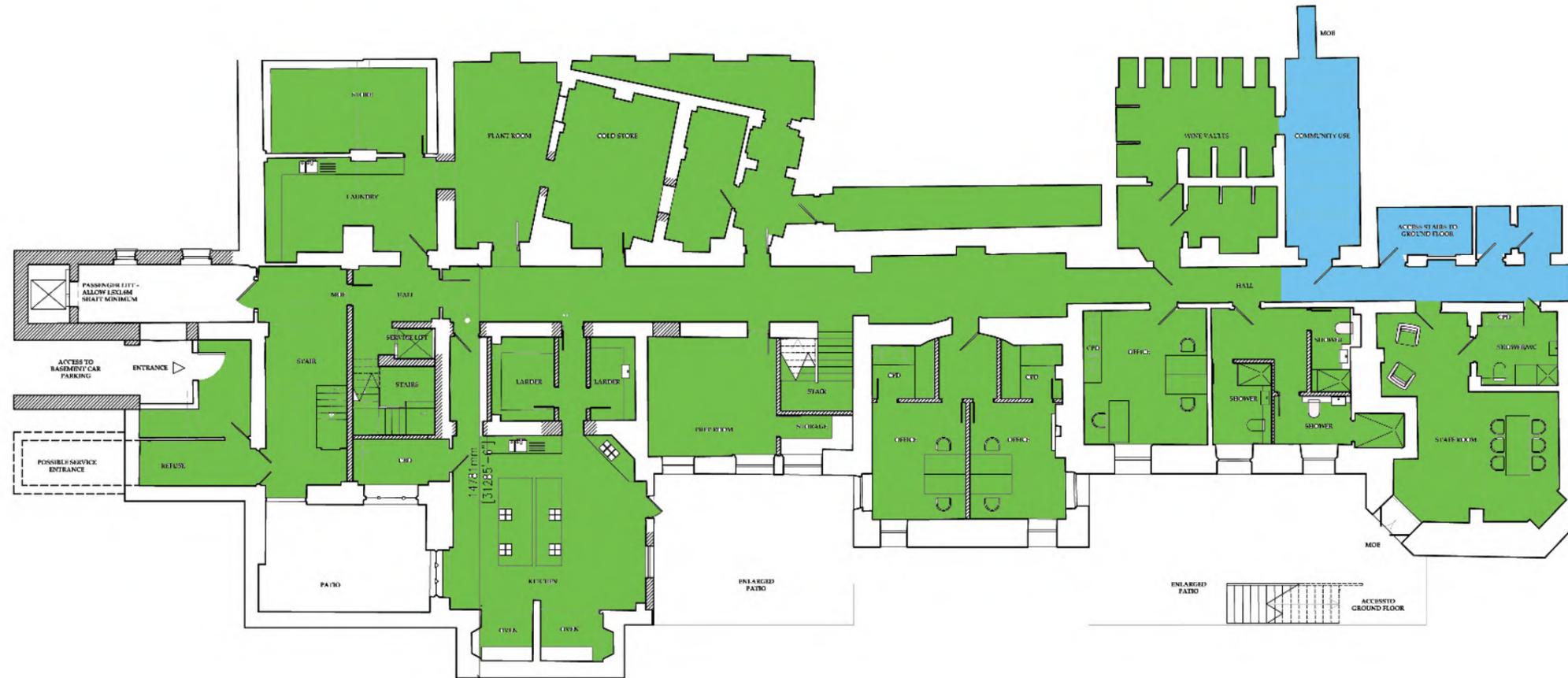
DRAWN BY: KN



OLD HYDE HOUSE, 75 HYDE STREET
 WINCHESTER, HAMPSHIRE, SO23 7DW
 TELEPHONE: 01962 843843 FACSIMILE: 01962 843303
 www.adamarchitecture.com contact@adamarchitecture.com

LONDON OFFICE: 6 QUEEN SQUARE, WC1N 3AT
 TELEPHONE: 020 7841 0140 FACSIMILE: 01962 843303
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Appendix 5 Internal Hotel Layout Plans



Hotel Servicing
 Can be opened to the Public



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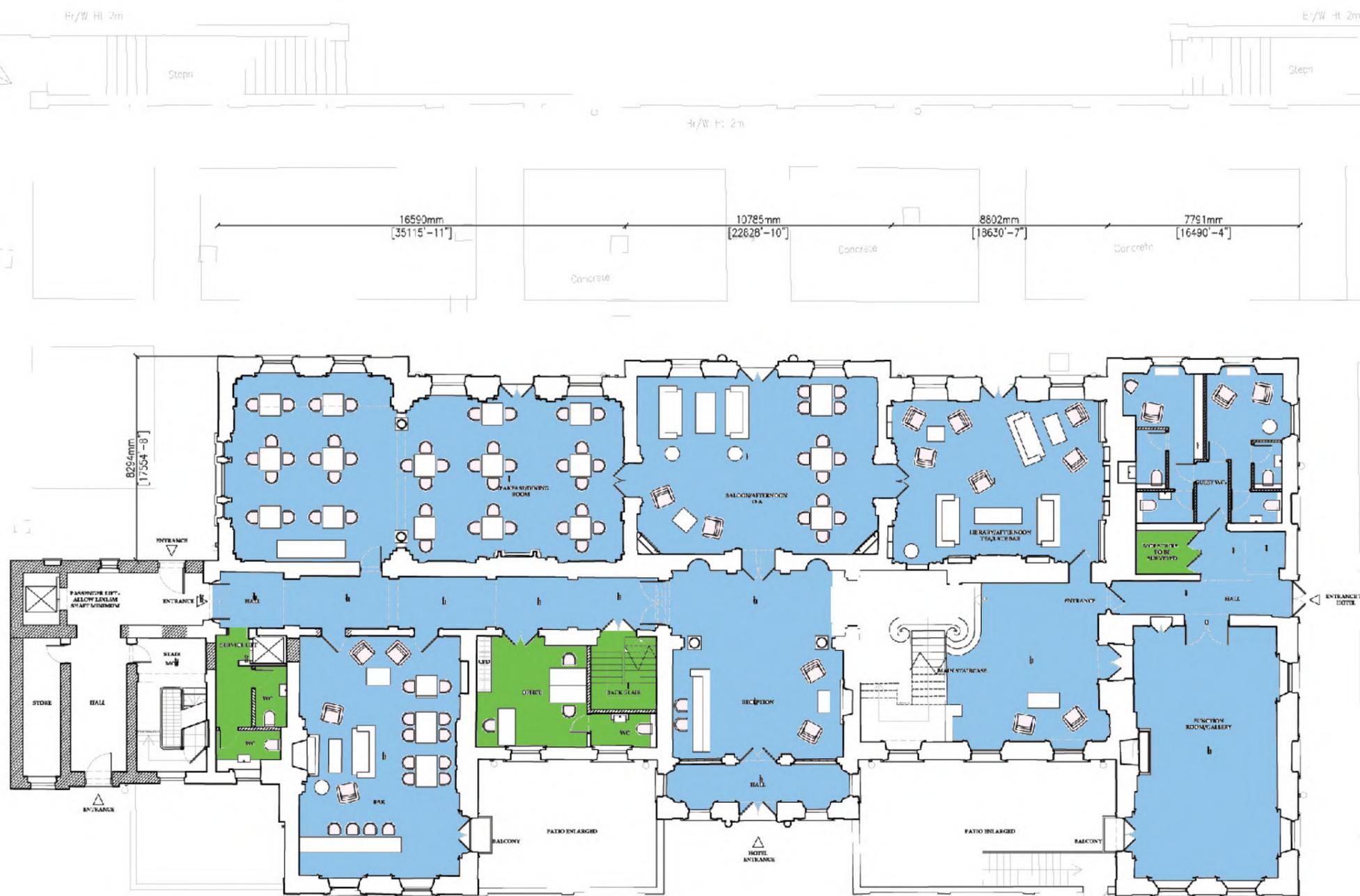
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Title: **PROPOSED: BASEMENT PLAN - OPTION C / HOTEL**

DRAFT

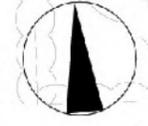
GILES QUARME AND ASSOCIATES
(Chartered Architects)
7 BISHOPS TERRACE
LONDON SE11 4UE

Tel: (020) 7882 0748
Fax: (020) 7793 8807
E-mail: mail@quarme.com

Drawing No: 9716.1 P(2)01.C	Revision:	Drawn: SMT
Date: March 2016	Scale: 1:200 @ A3	Checked: NB



Hotel Service/Office Use
 Hotel Public Use. Might be open to the public dependent on hotel management



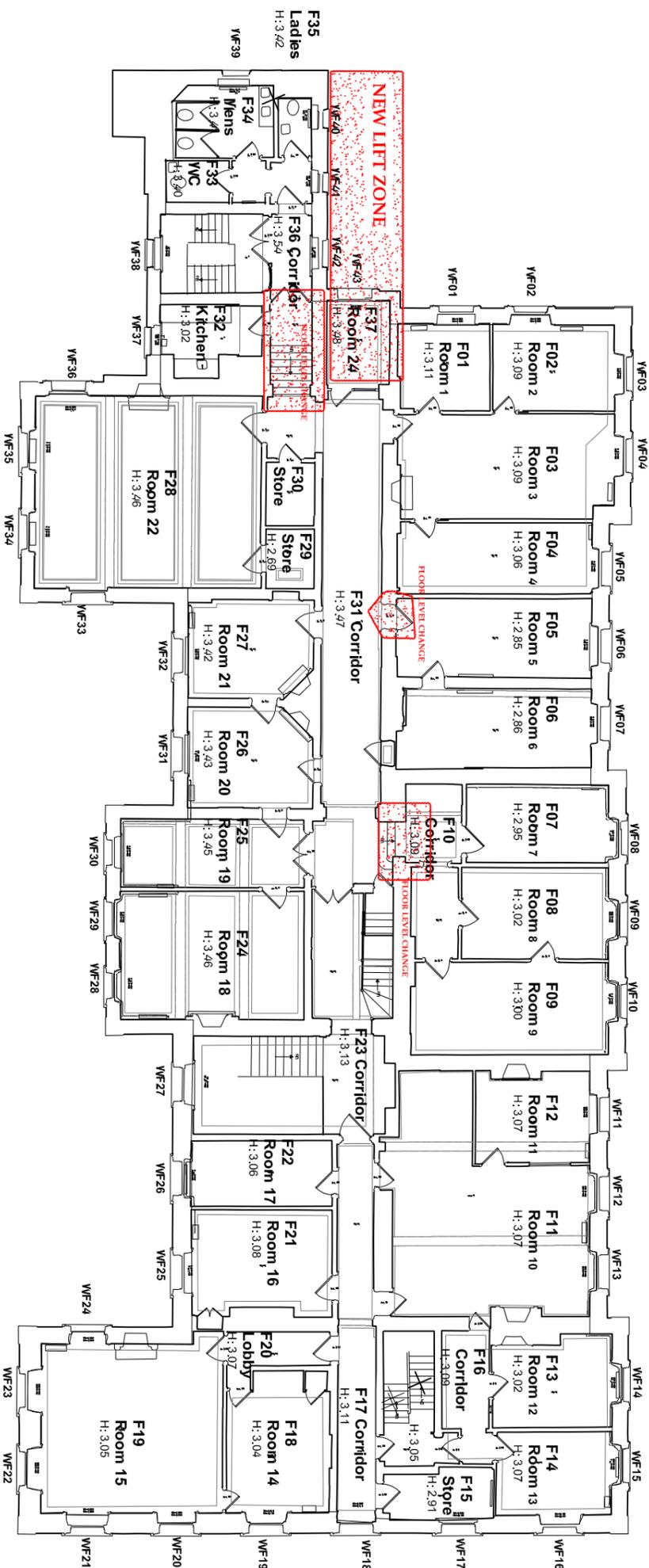
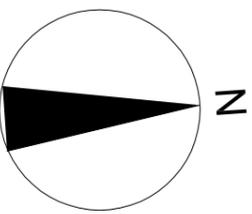
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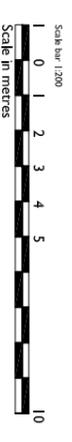
Project: **TRENT PARK, Enfield Job No: 9716**
 Title: **PROPOSED: GROUND FLOOR PLAN - OPTION C / HOTEL**

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GILES QUARME AND ASSOCIATES
(Chartered Architects)
 7 BISHOPS TERRACE
 LONDON SE11 4UE
 Tel: (020) 7982 0748
 Fax: (020) 793 8807
 E-mail: mail@quar.me

Drawing No: 9716.1 P(2)02 C	Revision:	Drawn: SMT
Date: March 2016	Scale: 1:200 @ A3	Checked: NB



- ISSUES THAT WILL HAVE AN IMPACT ON THE HISTORIC FABRIC:**
1. Acoustic insulation between all floors and walls.
 2. En-suite in every room unless a store or plant room
 3. sub-division of the larger rooms
 4. MoE
 5. Floor levels: raising & lowering of floors.
 6. Two lifts: one service lift and one guest lift.
 7. Secondary glazing
 8. Door widths for access
 9. Victorian Wing floor and ceiling height levels
 10. Fireplace removal?
 11. Single floor apartments only for retirement homes.



GENERAL NOTES:
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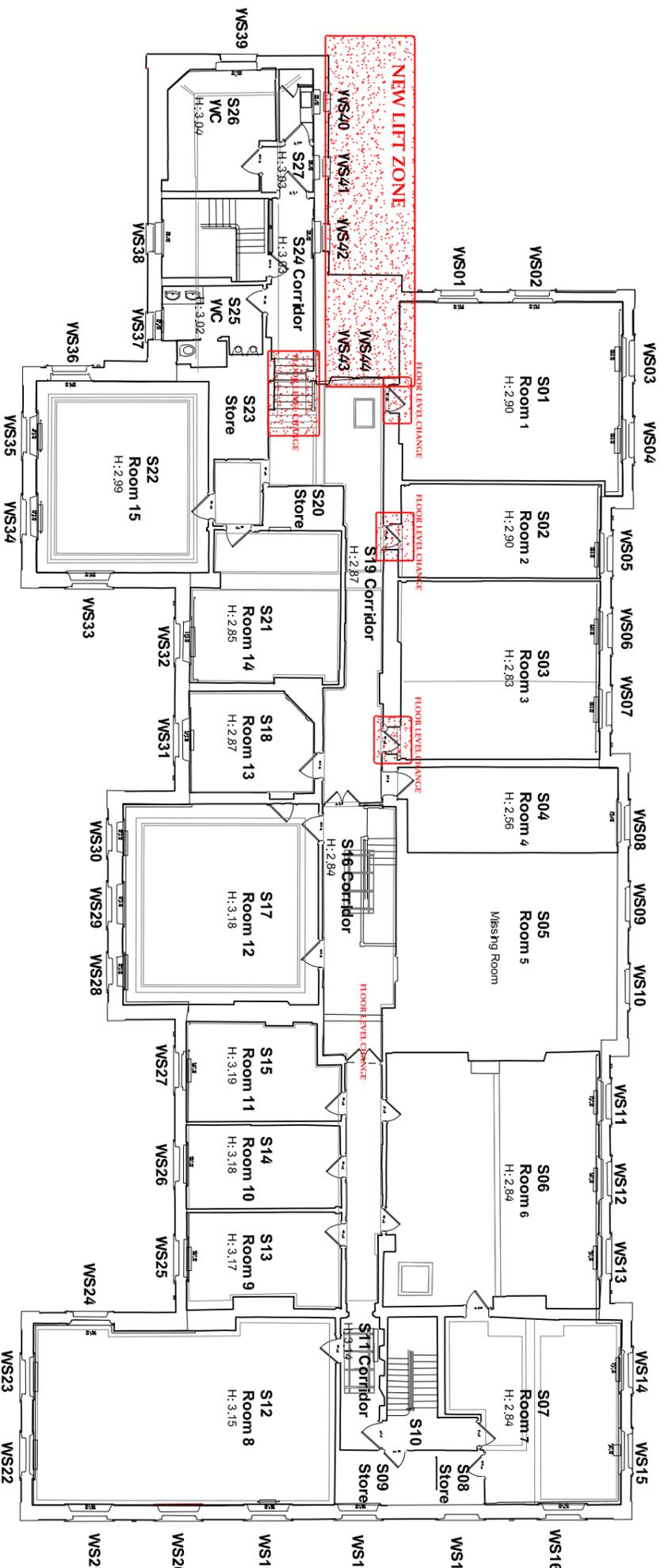
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Project: **TRENT PARK, Enfield Job No: 9716**
Title: **SURVEY: FIRST FLOOR PLAN WITH HISTORIC FABRIC ISSUES**

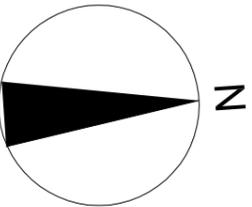
GILES QUARRE AND ASSOCIATES
(Chartered Architects)
7 BISHOPS TERRACE
LONDON SE11 4UE

Tel: (020) 7262 0718
Fax: (020) 7293 8887
Email: mail@gilesquarrie.com

Drawing No:	9716.1 S(2)03C	Revision:	*	Drawn:	JVS
Date:	Feb 2016	Scale:	1:200 @ A3	Checked:	NB



- ISSUES THAT WILL HAVE AN IMPACT ON THE HISTORIC FABRIC:**
1. Acoustic insulation between all floors and walls.
 2. En-suite in every room unless a store or plant room
 3. sub-division of the larger rooms
 4. MoE
 5. Floor levels: raising & lowering of floors.
 6. Two lifts: one service lift and one guest lift.
 7. Secondary glazing
 8. Door widths for access
 9. Victorian Wing floor and ceiling height levels
 10. Fireplace removal?
 11. Single floor apartments only for retirement homes.



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Project: **TRENT PARK, Enfield Job No: 9716**
 Title: **SURVEY: SECOND FLOOR PLAN WITH HISTORIC FABRIC ISSUES**

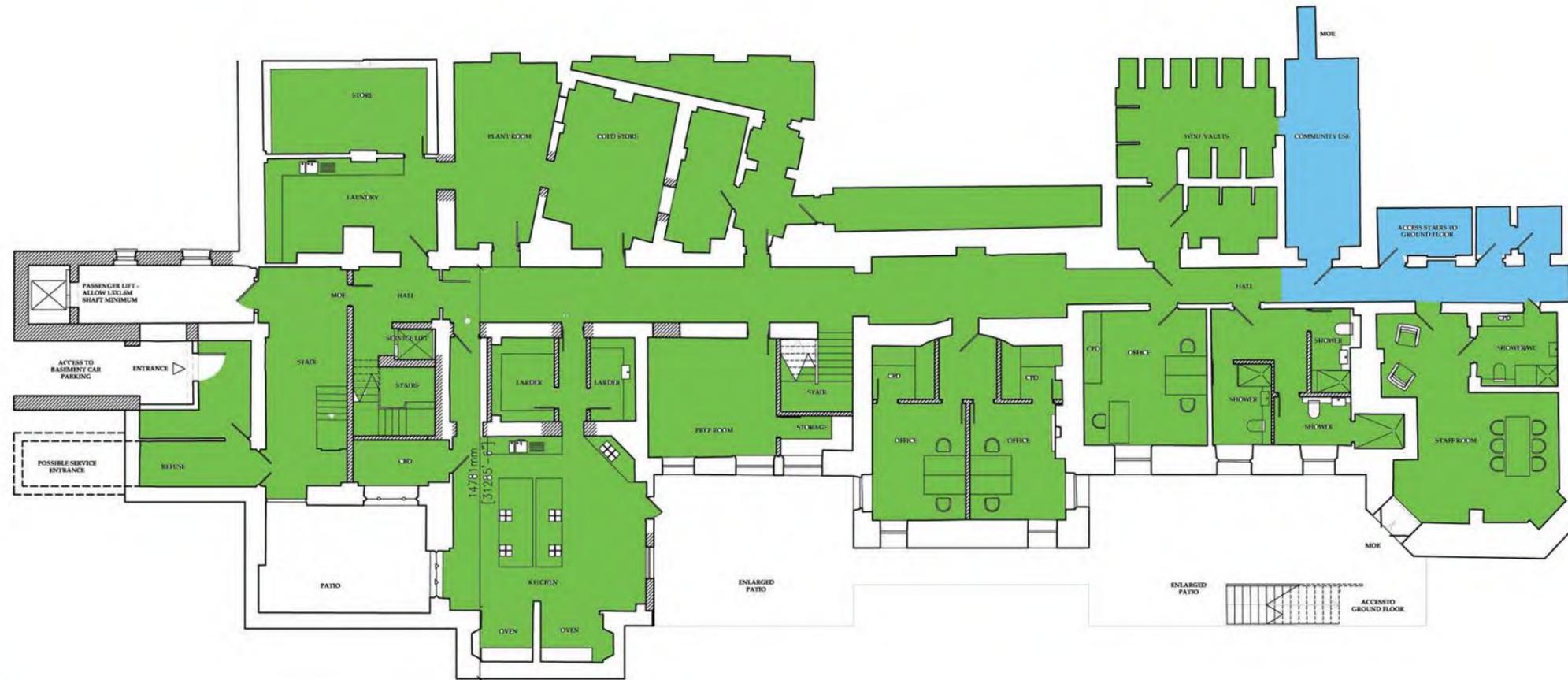
GILES QUARRE AND ASSOCIATES
(Chartered Architects)
 7 BISHOPS TERRACE
 LONDON SE11 4UE

Tel: (020) 7263 0718
 Fax: (020) 7293 8807
 Email: mail@gilesquarrie.com

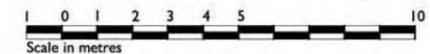
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 Date: **Feb 2016**
 Revision: *****
 Scale: **1:200@ A3**
 Drawn: **JVS**
 Checked: **NB**

GENERAL NOTES:
 Survey drawings are based upon the drawings produced by Aeconm, Jan 2016.

Appendix 6 Retirement/Care Home Layout Plans



- Retirement Home
May be possible for public to access at certain times of the year.
- Retirement Home Office and Staff use



GENERAL NOTES:
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Project: **TRENT PARK, Enfield Job No: 9716**
Title: **PROPOSED: BASEMENT PLAN - OPTION D/ RETIREMENT HOMES**

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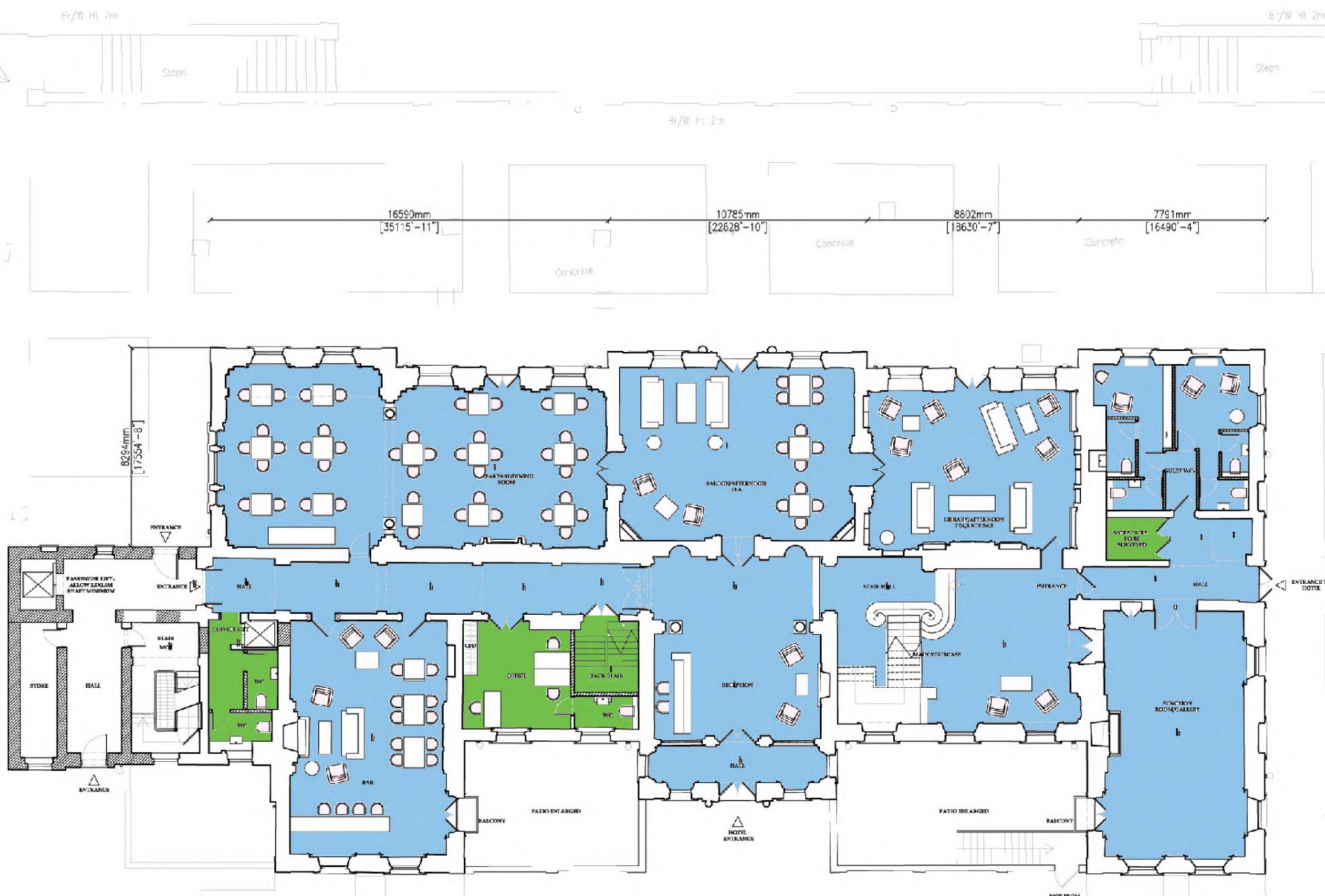
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(Chartered Architects)
7 BISHOPS TERRACE
LONDON SE11 4UE

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Fax: (020) 7793 8807
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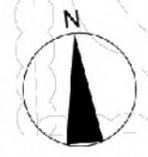
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Date: **March 2016**

Revision:
Scale: **1:200 @ A3**

Drawn: **SMT**
Checked: **NB**



- Retirement Home Communal Rooms:
May be possible for public to access at certain times of the year.
- Retirement Home Office and Staff use



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Project: **TRENT PARK, Enfield Job No: 9716**
 Title: **PROPOSED: GROUND FLOOR PLAN - OPTION D / RETIREMENT HOMES**

DRAFT
GILES QUARME AND ASSOCIATES
(Chartered Architects)
 7 BISHOPS TERRACE
 LONDON SE11 4UE
 Tel: (020) 7982 0748
 Fax: (020) 7993 8802
 E-mail: mail@quarme.com

Drawing No: 9716.1 P(2)02D	Revision:	Drawn: SMT
Date: March 2016	Scale: 1:200 @ A3	Checked: NB