

Local Plan Issues and Options 2018
Consultation Responses – Developers and Agents

Aristocrat Property Investments
Aytans MFG Co UK
Berkeley Homes
Blackrock and NEAT Developments
Boyer. Langhedge Lane Industrial Estate
Collective Planning. Modomo
Countryside Properties
Crosstree Real Estate Partners LLP
Henty Boot Developments
Hermes Property Unit
L&Q
Lichfields. Landowners at Crews Hill
Lichfields. The Wave London
Montagu Evans Crematorium Development
NHS Property Services
Notting Hill Genesis
Origin Housing
Quadrant. Barnet Southgate College
Quod. IKEA
Quod. Tottenham Hotspur
Savills. Brimsdown Landowners
Stonegate Homes
Tesco
Transport for London Commercial Development
View Point Estates

Dear Enfield Council

Response to the Local Plan Issues and Options Consultation

I understand that consideration is being given to allowing housing to be built at Cruise Hill. As a resident of the area I have been shopping there for over 30 years and feel there are few places where garden centres and the like are located together. I am sure it is a source of good employment and I know Thompsons of Cruise Hill successfully serve Hertfordshire and surrounding counties. It seems a shame and unnecessary to redevelop this area when there are many brown field sites identified already..... building at Cruise Hill just increase the London sprawl even more. Country roads will be clogged up and the whole character of the area destroyed.

I hope you can accept this

28 February 2019

Delivered by email (localplan@enfield.gov.uk)

Strategic Planning and Design
Enfield Council
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Dear Sir/Madam,

REPRESENTATIONS TO ENFIELD NEW LOCAL PLAN 2036: REGULATION 18 ISSUES AND OPTIONS

We write on behalf of Aytans MFG Co UK Limited to make representations to the Consultation Draft (Regulation 18) Enfield New Local Plan 2036 Issues and Options.

JS and SS Aytan are the freehold owners of two key parcels of land that lie to the west of Harbet Road within the eastern part of the Meridian Water area. Aytans MFG Co UK Limited is the Aytan's clothing business. The business is currently located in a unit known as Block F, adjacent to Harbet Road.

These representations focus on whether elements of the New Local Plan could meet the National Planning Policy Framework's (NPPF) four tests of soundness (which are: 'positively prepared', 'justified', 'effective' and 'consistent with national policy') when submitted for examination at Regulation 19 stage in the development plan preparation process.

In addition to the NPPF tests of soundness, the New Local Plan will be examined on the basis of fulfilling the duty-to-co-operate and meeting the legal requirements from the Planning and Compulsory Purchase Act 2004 and the Local Planning Regulations 2012. We make reference to the New Local Plan's conformity with the London Plan which is currently undergoing Examination in Public and will likely be adopted by the time the New Local Plan is submitted for examination in 2020.

We reserve the opportunity to make comments on other policies, the duty-to-co-operate and other legal compliance requirements in latter stages of the preparation of the New Local Plan.

CHAPTER 2 – Section 2.4 How must we plan differently (page 33)

The text box seeks to *"proactively manage and optimise low density industrial land to increase capacity and redevelopment for both housing and employment"*. On its own this objective would not be consistent with adopted London Plan Policy 2.17 or emerging draft London Plan Policies E5 (Strategic Industrial Locations) (SIL) and E6 (Locally Significant Industrial Sites) (LSIS). As such, it would be 'unsound' with regard to paragraph 35 of the NPPF.

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Additional text should be provided to add reference to and reflect the importance of strategic SIL and also LSIS allocations in policies E5 and E6.

Objective 1 (page 37), Section 2.11 The Eastern Corridor and industrial areas (page 47) and Section 2.14 Opportunity Areas (page 54)

The final bullet point under Objective 1 for the New Local Plan seeks to enhance the quantity, quality and density of the borough's SIL and LSIS, including the possibility for substitution and consolidation.

Section 2.11 (paragraphs 2.11.3 to 2.11.6) refers to the recognition in the London Plan for "strategic demand" in Enfield for industrial, logistics and related uses. The value and importance of the location of existing SIL (and LSIS) in Enfield is recognised in paragraphs 6.2.4 and 6.2.10 of the draft New Local Plan.

However, and in contrast, at 2.11.4 mixed-use and co-location of industrial use with housing is suggested in SIL and LSIS. This would not be consistent with Policy 2.17 in the adopted London Plan or draft Policies E5 or E7 in the draft new London Plan. E5 seeks to "*protect and intensify the function of SILs*". Insufficient recognition is given to the wording of Policy E7(B) and (E) that the effectiveness and integrity of industrial and related activities on-site and surrounding SIL should not be compromised.

Revisions to wording of these elements of the New Local Plan should be made to make it sound by more closely reflecting these London Plan policies.

Paragraph 2.11.6 suggests relocation or substitution of SIL may be necessary. However, LB Enfield's experience in respect of the Edmonton Leaside Area Action Plan (ELAAP) Examination in October 2018 demonstrates that this must not be simply an exercise on swapping a quantum of land. The qualitative characteristics of the land must be taken into account. The Council failed in its proposal to 'relocate' SIL from Harbet Road to Deephams Sewage Treatment works. The ELAAP Inspector in her Interim Letter dated 20 November 2018 stated "*The designation of Deephams Sewerage Works as SIL would not offset the loss of the existing SIL designation [at Harbet Road] from industrial use. Other new [proposed SIL] designations in the AAP are relatively small and their configuration, reduces their utility*". Parallel concerns were raised by the GLA in its representations to the ELAAP and at the Examination.

CHAPTER 6 – Policy E1: Business and Job Growth (page 108) and Policy E2: Approach to employment land (page 115)

The broad principle of Policy E1 is supported, but reference under part (b) of the policy to SIL and LSIS being important components of mixed-use places. Greater recognition must be given to protecting the function, effectiveness and integrity of industrial uses on such land (in line with draft London Plan Policy E5 and E7).

Paragraphs 6.2.11 to 6.2.22 provide commentary on allowing change to employment land to accommodate growth, substitution and consolidation and intensification, plus mixed-use and even release of industrial land. Policy E2 sets out the 'Approach to employment land' and includes policy wording to enable these changes to employment land.

Any such changes to allocated employment land, particularly SIL, such as at Harbet Road, must be robustly assessed and justified by evidence.

In respect of the proposed de-designation of SIL at Harbet Road in the ELAAP, the Inspector's Interim Letter stated:

“In order for this to be in accordance with policy 2.17 of the London Plan, the evidence supporting the plan would need to demonstrate that the land in question no longer fulfilled a functional employment need for industry and that any identified need could be adequately accommodated within the other designations proposed.

Only after such an analysis has provided a picture of the effects of de-designation, would it be reasonable to reach the conclusion that the loss of SIL, would be justified and in general conformity with the London Plan”.

The importance of adequate evidence to ensure the New Local Plan is sound – i.e. justified; based on reasonable alternatives and proportionate evidence is clear.

We reserve the opportunity to make further representations on subsequent stages of the Local Plan as the full set of evidence base documentation is published.

CHAPTER 11 – Policy SUS3: Sustainable Infrastructure (page 205)

This policy is not sound; on grounds it is not justified or consistent with national policy. Part (f) of the policy requires development proposals to connect to, or contribute towards the delivery of existing or planned low carbon local energy infrastructure, such as decentralised energy networks. Where no connection is available or planned, the policy then requires on-site CCHP or CHP.

Part (f) of SUS3 is not consistent with draft London Plan Policy S13, which requires a hierarchical approach to communal heating (with CHP last in the hierarchy). The NPPF (para 153a) states that feasibility and viability should be taken into account when assessing whether a scheme can connect to or provide decentralised energy.

The policy should explicitly state that energy infrastructure is to be in accordance with the hierarchy and requirements of the London Plan. To be consistent with national policy it should also allow for consideration of feasibility and viability in terms of whether a specific scheme can connect to or should reasonably contribute to delivery of a decentralised energy network.

Overall, with regard to the policies and explanatory text above, the draft New Local Plan at present does not meet the NPPF tests of soundness nor is it legally compliant (in terms of conformity with the adopted or draft new London Plan).

We trust that these comments will be considered and the Local Plan amended /accordingly. This is an interim representation and that we reserve the right to submit further representations in due course as the review of the New Local Plan progresses.

In the meantime we welcome the opportunity to discuss the comments further.

Yours faithfully,

Paul Keywood
Director

Via Email: localplan@enfield.gov.uk

Strategic Planning and Design Team
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Date: 28 February 2019

Dear Sir or Madam

Enfield Local Plan 2036 – Issues and Options (Regulation 18) Consultation

On behalf of Berkeley Homes (North East London) Limited ('Berkeley'), we are pleased to submit these representations to the Enfield Local Plan 2036 Issues and Options consultation. Berkeley builds beautiful, successful places, blending homes, parks and public realm with great facilities to create communities where people can live, work and enjoy themselves. It has an outstanding track record of delivering regeneration and new homes across London, and is currently building over 250 homes at Trent Park and a museum to celebrate the site's history.

Berkeley look forward to continuing to work with Enfield Council as it prepares a new Local Plan guiding the growth of the Borough to 2036 and, as a key stakeholder, we welcome the opportunity to comment on further iterations of the Plan. We set out our comments against the different parts of the consultation document as follows.

Promoting good growth options in Enfield

Berkeley support your recognition that "*Addressing the shortage of housing in Enfield is a priority*" (para 2.1.4). The National Planning Policy Framework (NPPF) embeds at its heart the importance of delivering growth to meet development needs identifying a presumption in favour of sustainable development (NPPF para 11). For plan-making this means positively seeking opportunities to meet the development needs of an area and setting out policies which should provide for objectively assessed needs for housing (as well as any needs that cannot be met within neighbouring areas).

In that context, housing needs in Enfield are acute. The draft new London Plan, which is currently undergoing examination, will set the housing target for Enfield and currently proposes an annual target of 1,876 homes per annum for the Borough. The London Plan is not without its challenges in meeting housing needs; across London it proposes a target of 64,935 net housing completions per annum, against the London SHMA's identified need of 66,000 per annum. Even then, Government's standard method for assessing housing needs suggests Enfield's needs are as high as c.3,500 homes per annum and for London are c.73,000 per annum. We support the Council's recognition of these housing needs in the Issues and Options document, and a target of 1,876 per annum would represent a total requirement for 33,768 homes over an Enfield plan period 2019-36.

Against this need we note that Enfield Council has set out in its responses to the London Plan¹ its estimated supply of homes from existing sources, ongoing estimates from small sites in the urban area (which we agree will be undeliverable given the Council has only delivered 720 homes over a five year period against a draft London Plan target of 983 homes per annum), plus development at Meridian Water. This suggests a housing trajectory supply of c. 1,043dpa, or c.18,800 over an 18-year plan period, within Enfield, leaving a broad 'still to find' figure of c.15,000 homes to be planned for through the Local Plan. This scale of gap is significant, but one which Berkeley consider "*good growth options*" in Enfield can successfully address in a plan-led manner.

How must we plan differently? (Page 33, Section 2.4)

Berkeley support the Council's proposals to plan delivery differently. Whilst making best and most efficient use of opportunities on brownfield land will remain the starting point (and is supported by the principles of the NPPF), the scale of growth necessary to meet local housing needs will require a step-change in delivery and a different way of planning for the future. The Council's proposals to look at a wide range of options, including revisiting Green Belt boundaries in line with national policy, is supported. The former Middlesex University Campus, Trent Park is a prime example of where a change in opinion of the approach to previously developed land within the Green Belt can lead to creating a place for new homes and contribute towards meeting the needs of the local community through the delivery of access to restored open space.

Growth objectives (Pages 36 & 37, Section 2.6)

The Council's strategy to deliver "*good homes in well-connected neighbourhoods*" (para 2.6.1) is supported. The growth objectives set out respond to this brief and Berkeley consider the combination of objectives can ensure the housing (and other development) needs of the Borough are met first and foremost, but that this can be done in a way that is sustainable and achieves an excellent built environment whilst protecting and enhancing the green environment.

Town centres and areas around stations (Page 39, Section 2.8)

Berkeley support the opportunity to locate growth around transport nodes. As illustrated by Figure 2.2 within the Issues and Options document, Enfield as a Borough benefits from excellent rail accessibility, which provides the opportunity to maximise opportunities for development. This may require making difficult decision in relation to existing land uses, such as the release of Green Belt land in good public transport locations, promoting higher densities in town centres, including promoting taller buildings to contribute towards meeting the Borough's housing target

Strategic plan-led approach to Green Belt (Page 50, Section 2.12)

The option of taking a strategic plan-led approach to Green Belt is fully supported. The NPPF sets out that Green Belt boundaries may be altered through Local Plans in 'exceptional circumstances' (para 136) which the NPPF goes on to indicate could include once all other reasonable options for meeting development needs have been examined. Given the likely scale of shortfall in housing which the plan will need to address, the Council's proposed plan-led approach to Green Belt approach is considered appropriate.

It is important to recognise the diverse nature of Green Belt and how well-planned developments on suitable sites within the Green Belt, such as that being delivered by Berkeley at Trent Park, can have a role to play in delivering new homes and community facilities whilst opening up the Green Belt for wider accessibility and

¹ https://www.london.gov.uk/sites/default/files/m20_lb_enfield_2643.pdf
[https://www.london.gov.uk/sites/default/files/m11_lb_enfield_2643 .pdf](https://www.london.gov.uk/sites/default/files/m11_lb_enfield_2643.pdf)

enjoyment. This is recognised at Paragraph 138 of the NPPF which indicates that when reviewing Green Belt land, plans should focus on previously developed land and/or areas well-served by public transport in the first instance.

Given the Green Belt constrained nature of Enfield Borough, it may also be necessary through any plan-led approach to consider the long-term development needs of the Borough well beyond the plan period. The NPPF at paragraph 139 sets out that when reviewing Green Belt boundaries plan-making authorities may need to safeguard land to meet development needs in the longer term, such that Green Belt boundaries will not need to be altered at the end of the Plan. It will be appropriate for the Council to consider such longer-term growth needs in the spatial strategy and approach adopted for the Plan.

Enhancing Heritage

Design Quality and Designated Heritage Assets (Pages 64 & 66, Section 3.2 and 3.3)

Berkeley supports the overarching approach to ensuring high quality design in new development which responds to a sites setting and character and is appropriate in the context of heritage assets including listed and locally listed buildings and conservation areas. Enfield has a number of important heritage assets, and from our experience of Trent Park, it is important to fully understand these assets before new development is designed and taken forward.

Whilst we support the need to conserve and enhance the character and appearance of the borough's heritage assets, the design of new buildings should not be confined to a particular style or pastiche. Our experience of working with the Council on the design of development within Trent Park demonstrates that well-designed modern buildings are appropriate and can fit synonymously with heritage buildings and assets.

Views (Page 69, Section 3.5)

Berkeley supports the ethos of Policy HE4 to protect strategic and local views; however, the Council has not identified on any plan where the key strategic views are and why these are important. The policy should be supported by a diagram which identifies these views as a general approach could result in hindering potential development sites for housing etc. An alternative approach would be to simply require the submission of accurate verified views as part of a major planning application, the views of which would be agreed with the Council.

Design and Tall Buildings

Policy D1: Achieving Design Excellence (Page 75, Section 4.1)

Achieving design excellence is fundamental to the success of any new development, to create places where people would want to live, work and enjoy. Berkeley supports the approach in policy D1 to achieve high quality design, but consider that some minor amendments are required to the wording of part c) which should require all homes to be designed to the same standard so that homes are tenure blind rather than requiring affordable homes to be designed to a higher standard than private housing and part g) which is ambiguous and needs to be more precise in terms of the "design and tenure elements" that need to be agreed at pre-application stage.

Meeting Enfield's housing need

Policy H1: Housing growth and quality (page 87, section 5.2)

Berkeley supports the draft policy approach to seek to deliver at least the annual London Plan target for Enfield over the plan period up to 2036 (currently 1,876 homes per annum) and the range of growth options to meet this target. In particular the reference to the London Plan target as a minimum to be met or exceeded is supported, particularly in the context of the scale of housing needs within Enfield over and above that target.

Policy H2: Affordable housing (page 91, section 5.3)

We welcome the approach that the Council has taken to affordable housing and its general conformity with the draft London Plan. Enfield is a diverse borough with different housing needs and affordability. The policy should there incorporate flexibility in the appropriate split between affordable tenures and the range of affordable housing products on the market and which registered providers would be prepared to support across different parts of the borough. Whilst Berkeley fully supports the delivery of affordable homes on site; in higher value areas, it may be more appropriate to deliver certain affordable housing products in areas of the borough where the need is greater or where better outcomes can be achieved. On this basis, we would suggest some flexibility in part e) of the policy rather than a blanket requirement for all affordable housing to be delivered on site.

For clarity, the policy should be clear that the requirement for a minimum of 35% affordable housing on site is by habitable room rather than by unit number. Again, this would be consistent with the London Plan and generally leads to the delivery of a greater number of affordable family homes.

Policy H4: Housing mix (page 94, section 5.5)

Whilst Berkeley supports the principle of ensuring there is an appropriate mix and choice of homes in the Borough, including ensuring there is a supply of family homes, it is considered that Policy H4 should not be overly prescriptive in its approach. It is noted that the Council is discouraged from setting overall targets for dwelling size mix by the London Plan (and Berkeley supports this) but recognised that the Council will still want to ensure an appropriate mix is still provided. As currently drafted, the approach in H4 strikes a reasonable balance, particularly requiring at c) developments to deliver a mix of sizes informed by the site characteristics; local need; the need to deliver mixed and balanced communities. This is important as different parts of the Borough have very different housing market drivers, housing needs, development opportunities and characteristics (e.g. in the Eastern Corridor compared with areas in the West of the Borough, or town centre locations versus more suburban locations) and it is necessary for policy to ensure flexibility on how housing mix and tenure is applied.

A Strong and Competitive Economy

We support the overarching vision for "Enfield to be a place of local entrepreneurs and 'makers' of craft and creativity where people want to innovate and do business". There are opportunities to create new spaces and employment locations within the Borough and where a pragmatic approach should be taken to existing uses which are no longer appropriate for the function or future needs of that centre. The Council should undertake a review of its centres and rationalise existing uses and create new spaces which would meet the aspirations of the area and future business and employment needs to meet its growth objectives. The provision of employment space and jobs will be fundamental to creating sustainable places and new communities and should be seen as going hand-in-hand with the Council's housing objectives over the plan period.

Summary

Berkeley is supportive of the aims and objectives which the Council has set out for its plan, to increase housing delivery, address local housing needs and pursue good growth for the Borough. The recognition that meeting those objectives will require a different approach to the previous Enfield Core Strategy is welcome. Berkeley supports the identification of options for meeting growth needs in areas well served by public transport and through a plan-led approach to considering Green Belt. Maintaining flexibility in the spatial approaches pursued, and the development management policies adopted, will in our view be important to ensure the Local Plan can significantly boost the supply and delivery of homes.

We welcome the opportunity to engage with the Council and contribute towards the development of the Local Plan.

Daniel Palman
Planning Manager

28 February 2019
Delivered by email

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Dear Sir/Madam,

REPRESENTATIONS TO ENFIELD NEW LOCAL PLAN 2036 ISSUES AND OPTIONS

We write on behalf of our clients, BlackRock and NEAT Developments, to make representations to London Borough of Enfield's New Local Plan 2036 Issues and Options (hereafter referred to as the New Local Plan), which is at Regulation 18 stage in the development plan preparation process.

These representations focus on the whether the New Local Plan, as progressing, could meet the National Planning Policy Framework's (NPPF) four tests of soundness (which are: 'positively prepared', 'justified', 'effective' and 'consistent with national policy') when submitted for examination at Regulation 19 stage in the development plan preparation process.

In assessing the potential for the New Local Plan to be sound, we have regard to land at Colosseum Retail Park. Our client has a vested interest in this site and is currently working with LB Enfield and other key stakeholders to bring this site forward for mixed-use redevelopment. To that extent we are seeking an allocation for this site. Details of the site and the proposed scheme are set out in our 'call for sites' submission, which is submitted alongside of these representations.

In addition to the NPPF tests of soundness, the New Local Plan will be examined on the basis of fulfilling the duty-to-co-operate and meeting the legal requirements from the Planning and Compulsory Purchase Act 2004 and the Local Planning Regulations 2012. We do not wish to make comments on these matters at this stage; except the legal requirement for the New Local Plan to be in general conformity to the London Plan. Our views on the New Local Plan's conformity with the London Plan are expressed throughout these representations. In this assessment, we are referring to the New London Plan, which is currently undergoing Examination in Public and will likely be adopted by the time the New Local Plan is submitted for examination (anticipated to be 2020).

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EXECUTIVE SUMMARY

The contents of our representations can be briefly summarised as:

- It is encouraging that LB Enfield is seeking to adopt the objective assessment of housing need figure as its target, which might be 3,500 new homes per year.
- The most appropriate strategy to meet that need is to focus development and increase densities in the main town centres and around stations, transport corridors and Opportunity Areas (particularly sites that do not have physical or policy constraints).
- The amount of development needed will not likely be deliverable at Green Belt, SIL and Crossrail 2 areas and as part of estate renewal.
- Colosseum Retail Park would be a development which fits within what should be the preferred strategy for meeting housing need and it should be given a site-specific allocation.
- There are a number of policies which we believe do not conform to the New London Plan or the NPPF. We encourage you to alter these policies in line with our suggestions.
- Overall, we consider the New Local Plan at present does not meet the NPPF tests of soundness nor is it legally compliant (in terms of conformity with the New London Plan). Our suggested remedies will however ensure the New Local Plan is fit for purpose.

Please read below for the full explanation of the above bullet points.

PROMOTING GOOD GROWTH OPTIONS IN ENFIELD

This sub-section considers Chapter 2 of the New Local Plan – which concerns LB Enfield’s development needs and the proposed strategic growth options to meet that need. We assess these options in terms of housing and the abovementioned NPPF tests of soundness and with reference to Colosseum Retail Park.

The New Local Plan proposes a housing target of at least 1,876 new homes per year, in the plan period 2018-2036. This target reflects that given to LB Enfield by the Mayor in the New London Plan, which was based on an objective assessment of need and a land availability assessment. In addition, the New Local Plan recognises (para 2.1.4 – 2.1.7) that a national government assessment of need for the borough is 3,500 new homes per year, and that the Secretary of State has indicated to the Mayor that his housing target for the boroughs falls short of the requirements. The New Local Plan therefore acknowledges that the housing target might have to increase. We commend LB Enfield for seeking to meet the objectively assessed housing need – this goes some way to ensuring that the New Local Plan will meet the ‘positively prepared’ soundness test.

A local plan is ‘positively prepared’ where there is a strategy for meeting the housing need. The significance for the need for such a strategy is heightened because LB Enfield has on average delivered only 550 new homes per year since the adoption of the Core Strategy in 2010 (New Local Plan para 2.1.4). This contrasts starkly with the new annual requirement which will be 1,876 as a minimum, and possibly up to 3,500. A step-change in the approach to housing delivery is needed.

Accordingly, LB Enfield has identified broad strategies to meet housing (and other) need. At this stage in the New Local Plan process, LB Enfield has not indicated which of these are preferred – the point of an

Issues and Options consultation is that this is open for debate. The broad strategies, or options, for consideration are:

- Main town centres and areas around all stations
- Transport corridors
- Existing estate renewal and regeneration programmes
- Eastern Corridor (which includes low density industrial estate areas)
- Future Crossrail 2 Growth Corridor
- Opportunity Areas
- Green Belt release

Growth options capable of delivering housing need

Our view is that for a housing delivery strategy to be effective, the main emphasis should be put towards more development and increased densities in: the main town centres and around stations, transport corridors and Opportunity Areas (particularly sites that do not have physical or policy constraints). Indeed the New Local Plan at para 2.4.1 states that a first principle is to exhaust *“all reasonable opportunities on brownfield land, making underused land work harder and optimising densities”*.

Optimising land in town centres and at train stations is an approach which is truly sustainable and in accordance with the principles and policies of the NPPF. LB Enfield recognises in the New Local Plan (paras in 2.8) such areas are *“high priority areas for development”*, which is in part because of their well-located nature (not relying on cars, near to amenities and services) and because they are *“generally free from constraints”*. The map contained in the New Local Plan at Figure 2.2 identifies a number of town centres and areas around stations. Notably absent is Southbury Station. Southbury Station should be specifically marked on Figure 2.2 as an area around a station which can deliver growth: it lies within an Opportunity Area, the Eastern Corridor and the Great Cambridge Road (A10) corridor (all are growth policy designations) and it benefits from east to west connectivity (as identified at Figure 2.2). Furthermore, nearby Colosseum Retail Park is able to realise this growth and deliver a sustainable development, given its lack of constraints and its accessible location.

In terms of transport corridors, the New Local Plan states that The Great Cambridge Road (A10) corridor has the potential to *“bring forward a scale of development opportunity, alongside supporting transport infrastructure improvements that have the potential to create new and cohesive sustainable communities. Land that is currently being used inefficiently by single storey industrial, commercial and retail buildings and surface level car parking should be promoted for intensification and comprehensive redevelopment”* (Para 2.9.1). It was highlighted by the local community within the Enfield Conversation held in 2017 that opportunities for growth and delivering a high number of homes should be exploited within the A10 corridor, amongst other identified areas. We agree with this approach and consider it to be a growth option which has the potential for the delivery of a large number of homes. Indeed Colosseum Retail Park sits within the Great Cambridge Road (A10) corridor and has the potential to deliver a significant amount of homes and other uses, along with physical regeneration and the improvements it brings. This has been recognised in para 2.9.3: *“...there are significant opportunities to look at comprehensive intensification of retail parks, such as Colosseum Retail Park...”* [our emphasis].

Opportunity Areas are Mayoral designations which are expected to deliver significant amounts of development. As a point of principle therefore, these areas should be a focus for Enfield's housing delivery. With specific regard to the Lee Valley Opportunity Area, we are pleased to note Colosseum Retail Park is now included within it (which sits just outside of it under the 2013 boundary, although it appears to now be proposed within it as shown on Figure 2.2 in the New Local Plan). Colosseum Retail Park has significant development potential and can greatly assist in meeting the housing requirements for the Lee Valley Opportunity Area. Furthermore, much of LB Enfield's expected housing delivery within this Opportunity Area was Strategic Industrial Land release at Meridian Water. As explained already, the release of such land has been refuted by an Inspector. This therefore places greater emphasis on the need for Colosseum Retail Park to benefit from Opportunity Area status.

Overall, Colosseum Retail Park would be a development which fits within what should be the preferred strategy for meeting housing need. It is located next to a railway station, it is within a transport corridor and it should form part of the Lee Valley Opportunity Area. For these reasons it should be given a site-specific allocation in line with the development proposals that are currently undergoing pre-application discussions and as set out in the 'call for sites' form.

Growth options which will not deliver the amount of housing needed

A substantive amount of housing is unlikely to be able to be delivered in existing estate renewal schemes. While we support the principle of utilising these assets to their full capacity, the existing estate renewal programme, as identified in para 2.10.1 of the New Local Plan, is expected to deliver only 3,000 homes. This is less than a year's worth of housing in the context of the government assessment of need. For that reason this growth option cannot be relied upon to deliver the housing needed.

Low density industrial estate areas (whether or not they are within the Eastern Corridor and/or an Opportunity Area – e.g. as part of Meridian Water) also cannot be relied upon to deliver a significant amount of homes. LB Enfield has recently tried to release Strategic Industrial Land (as part of the Edmonton Leaside AAP) for housing development in Meridian Water. The Inspector's November 2018 interim report, however, declares that there is no evidenced justification for the release of such land, which is contrary to strategic London Plan policy. Although the New London Plan encourages co-location/intensification of Strategic Industrial Land, the employment floorspace must be maintained. Thus the housing delivery capacity on such sites is hampered.

The Future Crossrail 2 Growth Corridor is dependent on the business case being accepted by central government and the reconfiguration of Strategic Industrial Land, as identified in the Draft Local Plan (paras in 2.13). Furthermore it is identified that 2032 is the targeted operation date for Crossrail 2 – which is only two years before the New Local Plan period ends in 2036. For these reasons, we consider that this growth option cannot be relied upon to meet housing need, especially in the short term.

Green Belt release is subject to the exceptional circumstances test set out in the NPPF, and this test has a high bar (and which includes the need to fully exhaust brownfield land and increase densities in appropriate areas beforehand). We do not wish to state that no Green Belt should or will likely be released whatsoever, but we have reservations about the amount of housing that could be delivered on Green Belt sites, particularly as the housing need is so substantial. Therefore we conclude that Green Belt release is not a growth option which should be preferred.

Conclusions on housing need and strategy in relation to tests of soundness

We consider that the New Local Plan is 'positively prepared' in that it seeks to adopt a housing target which reflects the Mayor's target or which will reflect LB Enfield's own objective assessment of need in accordance with government methodology. By implication there is no preferred strategy at this Issues

and Options stage – but we consider that the strategy to meet housing need should be based primarily on optimising land at train stations/town centres, at transport corridors and within Opportunity Areas. Progressing with a strategy that does not emphasise growth in these locations (i.e. emphasising growth in our ‘discarded’ options) will run the risk of the New Local Plan failing to meet housing need and thus failing the ‘positively prepared’ test of soundness.

To be ‘justified’, the New Local Plan must be an appropriate strategy, taking into account the reasonable alternatives. Until the New Local Plan has reached Regulation 19 stage and has assessed why particular growth options have and have not been taken forward, we cannot fully comment on this matter. We are though encouraged that LB Enfield is considering a range of options, which includes making better use of sites such as Colosseum Retail Park.

The ‘Effective’ test concerns the deliverability of the New Local Plan. Again, as the New Local Plan is at Issues and Options stage, we cannot comment fully on this matter. We will though stress that Colosseum Retail Park is a deliverable potential allocation – it is available now, in a suitable location for development and housing can be delivered within five years of the adoption of the New Local Plan.

The final test of soundness is whether the New Local Plan is ‘consistent with national policy’, which is contained within the NPPF. At the heart of the NPPF is a presumption in favour of sustainable development. For plan-making this means two things: (1) that the New Local Plan should positively seek opportunities to meet development needs and be sufficiently flexible to adopt to change and (2) provide for objectively assessed needs for housing and other uses. The first criterion could be met if LB Enfield prepares policies that positively respond to opportunities for sustainable development that are presented to it: the Colosseum Retail Park redevelopment being a case in point. With regard to the second criterion, as mentioned already, we consider that the New Local Plan is attempting to provide for the objectively assessed housing need.

COMMENTS ON DRAFT NEW LOCAL PLAN POLICIES

We now provide comments on the individual policies proposed by the New Local Plan (Chapters 3 to 10).

For simplicity, each sub-heading reflects each chapter of the New Local Plan and contained within it is a table which assesses the policies of each chapter in terms of the legal requirement for general conformity with the New London Plan and the NPPF test of soundness which requires consistency with its national policies. The table also contains a column for suggested amendments. We have not listed the wording of the proposed policies to avoid repetition (as they are listed in full in the New Local Plan).

Please note we provide comments only where we consider relevant. Many policies are not commented on, but we reserve the right to make further comments on these at a later stage in the New Local Plan preparation process.

Enhancing heritage (Chapter 3)

We do not wish to make comments on Policies HE1 (Design quality and local character), HE2 (Designated heritage assets, their setting and archaeology) and HE3 (Locally listed and undesignated heritage and cultural practices) and HE4 (Views). However, we reserve the right to make further comments on these at a later stage in the New Local Plan preparation process.

Design excellence (Chapter 4)

Policy	New London Plan conformity	NPPF conformity	Suggested amendments to policy
D2 Character and density	This policy is in general conformity with the New London Plan, but should make reference to the need to refuse applications that do not demonstrably optimise density of a site, in line with New London Plan Policy D6.	This policy is in general conformity with the NPPF, but should specifically include reference to the need to refuse applications that do not make efficient use of land, in line with NPPF para 36.	<p>The policy as proposed refers to the need to ensure more tall buildings and higher density development are realised. We support this approach but note that specific reference should be made to the need to refuse applications that do not make efficient use of land and do not demonstrably optimise densities.</p> <p>The policy also refers to tall buildings and higher densities in “<i>appropriate places</i>.” LB Enfield’s evidence base document ‘Report on Tall Buildings and Important Local Views in Enfield’ identifies the area around Colosseum Retail Park as an appropriate location for tall buildings. This policy should make reference to this.</p>

We do not wish to make comments on Policies D1 (Achieving design excellence), D3 (Design for co-location and mixed use development) and D4 (Designing for a sustainable, safe and inclusive borough). However, we reserve the right to make further comments on these at a later stage in the New Local Plan preparation process.

Meeting Enfield’s housing needs (Chapter 5)

Policy	New London Plan conformity	NPPF conformity	Suggested amendments to policy
H1 Housing growth and quality	Yes – 1,876 per year housing target reflects the Mayor’s housing	No –the target should increase to 3,500 homes per year to reflect the	The housing target should to increase to 3,500 homes per year.

	target. The Secretary of State has however written to the Mayor to advise that this target must be reviewed following adoption.	government's objectively assessed need.	The policy should also recognise that in order to achieve the step change in housing delivery required 'local character' might need to change (where appropriate).
H2 Affordable housing	<p>No – New London Plan Policy H6 allows for 35% affordable housing for individual sites, subject to viability.</p> <p>New London Plan Policy H7 states 30% of affordable housing delivery should be social rent OR London Affordable Rent (whereas this policy states AND). Policy H7's supporting text also refers to the 40% element of the tenure split to be determined having regard to viability and the need for inclusive communities. This policy does not make reference to this.</p>	No – the suggested 50% affordable target is not underpinned by evidence, as required by NPPF Chapter 5.	<p>Affordable housing target should be evidenced based and/or allow 35% affordable housing for individual sites, subject to viability.</p> <p>30% of affordable housing delivery should be social rent OR London Affordable Rent</p> <p>The 40% element of the tenure split to be determined by the Council will be 'in line with site specific circumstances including, but not limited to, financial viability, practical feasibility, the need to maximise affordable housing delivery, the latest SHMA and any addition up to date evidence on local housing needs and the need to create mixed/ balanced communities'.</p>
H4 Housing mix	We consider it to be in general conformity, particularly the recognition that two-bed homes can be categorised as family homes as per the supporting text to New London Plan Policy H12.	Yes – the policy seeks a mix based on local need, as required by NPPF para 61.	We generally support the policy as proposed, but reference should be made to one and two-bed units being better suited to development in accessible locations close to a station or town centre.

We note New London Plan Policy H12 makes reference to the fact that one and two-bed units are better suited to accessible locations close to a station or town centre.

H5 Private rented sector and build-to-rent	The thrust of the policy is in general conformity, but it should make clear reference to an expectation that discounted market rent be the appropriate affordable housing tenure. This would reflect New London Plan Policy H13.	Considered to be in general conformity.	Amend to make clear discounted market rent be the appropriate affordable housing tenure.
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We do not wish to make comments on Policies H3 (Small sites), H6 (Custom and self-build housing), H7 (Supported and specialist housing) and H8 (Gypsy and traveller accommodation). However, we reserve the right to make further comments on these at a later stage in the New Local Plan preparation process.

Promoting a competitive economy (Chapter 6)

Policy	New London Plan conformity	NPPF conformity	Suggested amendments to policy
E1 Business and job growth	The policy's provision for employment to be located in growth and investment areas is in line with the New London Plan focus on employment growth in Opportunity Areas (Policy SD1).	Considered to be in general conformity with NPPF (chapter 6), which stresses the need for flexibility and responsiveness to market needs.	We support the policy as worded.

We do not wish to make comments on Policies E2 (Approach to employment land), E3 (Office), E4 (Supporting small business), E5 (Skills and access to employment), E6 (Digital infrastructure), and E7 (Creative Enterprise Zone). However, we reserve the right to make further comments on these at a later stage in the New Local Plan preparation process.

Planning for vibrant town centres (Chapter 7)

Policy	New London Plan conformity	NPPF conformity	Suggested amendments to policy
TC1 Town centres	The allowance for main town centre uses in growth and investment areas is in general conformity with the New London Plan retail approach (Policy SD7) in terms of Policy SD7's allowing of main town centre uses to remain as part of housing-led intensification.	No comment.	No suggested amendments.
TC2 Successful town centres	No - New London Plan Policy SD7 seeks to realise the full housing potential of out-of-town retail parks. The policy should therefore make provisions for this. Also, there is reference to Enfield's taking account of viability and retail underprovision in the area, when considering loss of non-town centre retail uses. This conflicts with New London Plan Policy SD7 which allows the loss of out-of-town retail uses (but does also retention of same amount of floorspace).	No – NPPF para 121 requires a positive approach to be taken for housing development on retail land that is not compatible with other policies (i.e. out-of-town retail parks). The policy should therefore make a specific allowance for housing development on out-of-town retail parks.	The policy should therefore make a specific allowance for housing development on out-of-town retail parks.
TC3 Meanwhile uses	New London Plan Policy D7 encourages meanwhile uses in phased developments. Therefore there is general conformity.	NPPF does not reference meanwhile uses.	Minor amendment to policy to make reference to meanwhile uses being supported in phased developments.
TC4 Evening and night time economy	Comments as per TC1.	Comments as per TC1.	Comments as per TC1.

Community and social infrastructure (Chapter 8)

Policy	New London Plan conformity	NPPF conformity	Suggested amendments to policy
SI1 Social and community infrastructure	Does not conform. New London Plan Policy S1 refers to social infrastructure as health provision, education, community, play, youth, early years, recreation, sports, faith, criminal justice and emergency facilities. The policy's inclusion of 'leisure' is not consistent, as 'leisure' covers a broader range of uses (cinemas and bingo halls for example) than the New London Plan definition. And these other leisure uses are in any event addressed by Policy SI3.	Does not conform. NPPF defines community facilities in para 92, as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship. We do not consider that a blanket 'leisure' category which includes cinemas and bingo halls falls within this definition.	Policy should not make reference to 'leisure' uses as being community and social infrastructure because it might lead to the protection of uses which are not genuinely community and social infrastructure as defined by the New London Plan and the NPPF.
SI3 Arts and cultural facilities	New London Plan Policy HC5 defines cultural facilities as performing and visual arts studios, creative industries workspace, museums, theatres, cinemas, libraries, music, spectator sports, and other entertainment or performance venues, including pubs and night clubs. The policy refers to 'leisure' uses as art and cultural facilities. This would lead to the protection of a bingo (as a leisure use), which is not an arts and cultural facility as per the New London Plan definition.	No comment. The NPPF does not give definition of arts and cultural facilities.	Policy should not make reference to 'leisure' uses as being an arts and cultural facility because it might lead to the protection of uses which are not genuinely arts and cultural facilities, as defined by the New London Plan.

We do not wish to make comments on Policy SI2 (Health and wellbeing). However, we reserve the right to make further comments on these at a later stage in the New Local Plan preparation process.

Enfield's green and blue spaces (Chapter 9)

We do not wish to make comments on Policies GI1 (Green and blue spaces), GI2 (Green Belt and Metropolitan Open Land), GI3 (Greening the borough), GI4 (Biodiversity and Site of Importance for Nature Conservation), GI5 (Blue Ribbon Network) and GI6 (Burial space and crematorium).

However, we reserve the right to make further comments on these at a later stage in the New Local Plan preparation process.

Sustainable movement and transport (Chapter 10)

Policy	New London Plan conformity	NPPF conformity	Suggested amendments to policy
T1 Making the public transport more accessible and the natural choice for longer trips	No comment.	No. T1 seeks financial contributions for bus network infrastructure for seemingly all and any development. Contributions should be sought only where they meet the NPPF para 54 tests (such as being directly related to the development). Para 34 of the NPPF does require local plans to identify infrastructure levels and types, but this must be informed by evidence.	Remove reference to seeking contributions for bus network infrastructure or provide evidence to inform contributions required.
T2 Reducing the impact of private vehicles on our streets	London Plan Policy T6 requires car-free development to be the starting point and elsewhere schemes to be car-lite. Maximum standards are imposed. This policy is in general conformity with the London Plan, but we suggest that the wording of this policy is widened to include reference to car-free being the starting point.	No comment.	Make reference to car-free development being the starting point.
T3 Making active travel	No comment.	No – our comments	Our comments reflect

the natural choice		reflect those for Policy T1.	those for Policy T1.
T4 Making more school trips safe, sustainable and healthy	No comment.	No – our comments reflect those for Policy T1.	Our comments reflect those for Policy T1.

Sustainable infrastructure and environmental impact (Chapter 11)

Policy	New London Plan conformity	NPPF conformity	Suggested amendments to policy
SUS3 Sustainable infrastructure	SUS3's energy provision requirements do not align with London Plan Policy S13, which requires a hierarchical approach to communal heating (with CHP and gas boilers bottom of the hierarchy).	The NPPF (para 153) states that feasibility and viability should be taken into account when assessing whether a scheme can connect to or provide decentralised energy.	The policy should explicitly state that energy infrastructure is to be in accordance with the requirements from the London Plan. It should also allow for consideration of feasibility and viability in terms of whether a scheme can connect to or provide decentralised energy.

We do not wish to make comments on Policies SUS1 (Sustainable building), SUS2 (Sustainable living and working), SUS4 (Minimising flood risk) and SUS5 (Surface water management). However, we reserve the right to make further comments on these at a later stage in the New Local Plan preparation process.

CONCLUSIONS AND SUMMARY

As a minimum, local planning authorities must provide a strategy which seeks to meet objectively assessed needs (including housing). LB Enfield in its New Local Plan seeks to achieve the Mayor's annual housing target of 1,876. The New Local Plan also recognises that this need might be 3,500 new homes per year, using government methodology to calculate need. It is encouraging that LB Enfield is seeking to adopt the housing need figure as its target.

Seven broad strategies, or options, are proposed to accommodate this need. We consider that the emphasis should be on more development and increased densities in: the main town centres and around stations, transport corridors and Opportunity Areas (particularly sites that do not have physical or policy constraints). For the reasons set out in these representations, the amount of development needed will not likely be deliverable at the other proposed options: Green Belt, SIL, Crossrail 2 areas and estate renewal. To this extent, Colosseum Retail Park would be a development which fits within what should be the preferred strategy for meeting housing need and it should be given a site-specific allocation.

Turning to the proposed individual policies, there are a number of these which we believe do not conform to the New London Plan or the NPPF. We encourage you to alter these policies in line with our suggestions.

Overall, we consider the New Local Plan at present does not meet the NPPF tests of soundness nor is it legally compliant (in terms of conformity with the New London Plan). LB Enfield should therefore pursue our suggested growth options and make alterations to the individual policies as per our suggestions.

We trust that you will consider our comments and respond accordingly. We would like to highlight that this is an interim representation and that we reserve the right to submit further representations in due course as the review of the New Local Plan progresses.

In the meantime we welcome the opportunity to discuss the comments with you further should you find this of assistance. If you have any queries, please do not hesitate to contact Ben Wrighton, Craig Slack or Rachel Hearn at our London office.

Yours faithfully,

Turley

27 February 2019
Our Ref: 17.5064

24 Southwark Bridge Road
London
SE1 9HF

By email only: localplan@enfield.gov.uk

T 0203 268 2018

Dear Sir or Madam

Re: Draft Local Plan 2036 consultation – representations to Policy E2 clause I)

These representations are made on behalf of the landowner of Langhedge Industrial Estate, 6 to 8 Snells Park, Langhedge Lane, London N18 2TJ.

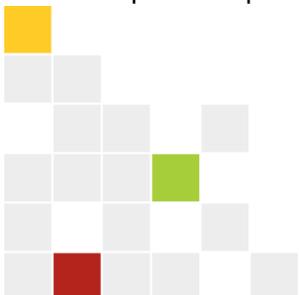
Policy E2 seeks to ensure the more efficient use of employment land to support economic growth sectors and higher jobs density. It is anticipated that this should be achieved through the retention of the most suitable locations and with the managed release of land that is/or becomes surplus to such requirements over the plan period.

This policy aspiration is to be welcomed. However, the policy prescribes how it is anticipated that this would be achieved. Clause I states (inter alia) that proposals involving the loss of employment floorspace and jobs will be expected to have in place a strategy to deal with the relocation requirements of existing businesses that cannot be incorporated within a redevelopment. The policy requires that reasonable endeavours are made to ensure occupiers have a suitable alternative site secured including transitional arrangements.

This policy requirement places the responsibility of the relocation of tenants on the developer of a site. The policy does not take into account the tenancy arrangement that a tenant is likely to have for premises with redevelopment potential nor does the policy have regard to the relevant legislation regarding landlord and tenant matters, the Landlord and Tenant Act 1954 (the Act).

The policy does not reflect the commercial reality of the landlord and tenant agreement for space that is life-expired and has redevelopment potential. Tenants occupying space with redevelopment potential do so outside of the Landlord and Tenant Act on commercially attractive rents and with a mutually agreed lease termination date. Those tenants within the Act enjoy full protection of the terms of that legislation. In both scenarios there is a clear contract as to the duration of a tenancy. In short, occupants of employment sites with development potential will be doing so with full knowledge of the date the termination of their lease.

The drafting of Clause I of Policy ED2 seeks to transfer responsibility to the landlord for individual businesses relocation strategies. The policy does not take into account that individual lease arrangements are reflective of the redevelopment potential of particular sites, that separate legislation exists in the management of landlord and tenant agreements and that it is unreasonable to place responsibility for businesses' relocation strategy to a third party. In the case of life-expired



space with development potential, tenants have chosen to let the space on the basis of having to relocate in the short term and this is reflective of the terms of their tenancy. This is an established relationship between landlords of life-expired stock with redevelopment potential and tenants willing to take short-term leases at discounted rent.

The clause should therefore exclude any reference to there being responsibility upon the landlord for the relocation of tenants in the light of separate legislation that operates in relation to landlord and tenant arrangements. The acceptability of proposed development that results in the loss of existing floorspace should not be dependent upon matters that are beyond the control of the applicant and subject to separate legislation.

We look forward to further updates regarding the Local Plan process. Please do not hesitate to contact Boyer should you wish to discuss further.

Yours faithfully

Charlotte Yarker
Associate Director

Boyer

Planning and Regeneration Department
Civic Centre
Silver Street
Enfield
EN1 3XA

28th February 2019
Ref JF/0195

Dear Sir/Madam,

NEW LOCAL PLAN REPRESENTATIONS ON BEHALF OF MODOMO

I write on behalf of my client Modomo to make representations to LB Enfield's draft New Local Plan which is currently out for consultation.

Introduction

Modomo is a startup modular housing developer seeking to utilise meanwhile sites for precision manufactured housing across London. Modomo aspire to develop their modular housing model as a solution to creating quick and affordable homes at a large scale in order to address the rapidly growing housing demand.

Draft Policy TC3 – Meanwhile Uses

Draft Policy Approach TC3 of the Enfield Draft Local Plan 2036 states:

The Council will support proposals for meanwhile uses, where they contribute to regeneration and enhance the character and vitality of the area.

Representations to policy

Inclusion of 'housing' as a meanwhile use

Modomo supports the thrust of Policy Approach TC3 which illustrates the importance of meanwhile uses as a form of contributing to regeneration objectives. However, there is an opportunity and requirement to expand the influence of the policy to include housing as a meanwhile use. This would help align the draft policy with the new Draft London Plan policy H4 'Meanwhile uses as housing'. The Draft London Plan is currently being considered at Examination in Public and the policies hold material weight. Paragraph 0.3 of the adopted London Plan states that the London Plan is the strategic, London-wide policy context within which boroughs should set their detailed local planning policies. Thus, there is a requirement for Enfield's new Local Plan to conform with the policies within the London Plan, and specifically

Policy TC3 to recognise housing as a potential meanwhile use.

Flexibility of meanwhile timeframes

Modomo also requests that the length of time that constitutes a meanwhile use contains flexibility within the policy to ensure there is an understanding between all parties that meanwhile uses can range anywhere from 6 weeks to 10-12 years and beyond. Meanwhile uses are temporary uses on land and property awaiting longer-term development. Depending on when this longer-term development comes forward will dictate the life-cycle of the meanwhile uses. Each site will be brought forward at a different rate and it is therefore important to include flexibility within the definition of meanwhile uses in Draft Policy Approach TC3.

Flexibility in housing typologies

There must be scope to allow different housing typologies/solutions to come forward depending on specific meanwhile site circumstances. Conventional housing may not be appropriate on all sites so the end housing product must be determined depending on location, demographic needs and individual site circumstances. Furthermore, whilst affordable housing is considered appropriate for permanent homes, housing on meanwhile sites will be relocated at a later date and should therefore not trigger the affordable housing policies in the plan.

Policy TC3 should aspire to create large amounts of new housing quickly, increasing the supply of homes whilst addressing housing demand, utilising otherwise unused land on a temporary basis.

Flexibility in size and tenure

The policy should state that a degree of flexibility will be applied to housing space standards/tenure where this would facilitate the maximum number of homes on meanwhile sites, as long as it can be demonstrated that the housing build quality is high and the environmental standards are high.

Policy amendments

Modomo request the policy is amended to read:

The Council will support proposals for meanwhile uses, including meanwhile housing, where they contribute to regeneration and enhance the character and vitality of the area. The time period for meanwhile uses will vary and temporary permission should be considered against specific site circumstances and based on anticipated timeframes for long term development. Meanwhile status can still apply to a use in situ for 10+ years.

Flexibility will be applied to viability, housing typologies, tenure, and size standards where an identified need can be demonstrated, to allow schemes to come forward quickly and viably.

Conclusion

Meanwhile housing can make an effective contribution to the London wide and LB Enfield's housing need and the policy should be extended to including housing as a potential meanwhile use. This would align with emerging regional planning policy which supports and encourages the meanwhile use of sites for housing.

Yours sincerely,

John Ferguson BSc (Hons), PG Dip TP, MRTPI
Director



TERENCE
O'ROURKE

Strategic Planning and Design
Enfield Council
FREEPOST
NW5036
EN1 3BR

25 February 2019

Our Reference: 180611G

Dear Sir/Madam,

A New Local Plan for Enfield 2018 - 2036 Consultation Response

On behalf of our client, Countryside Properties PLC (Countryside), we are pleased to provide comments on the draft new Local Plan for Enfield.

Countryside are already working successfully in partnership with the Council to deliver long-term regeneration at the Alma Estate, Ponders End and look forward to assisting the Council to prepare a robust and comprehensive Plan that will enable the borough to deliver the growth needed in future, including to meet its challenging housing need and address the requirement for affordable housing.

Outline planning permission was granted for the redevelopment of the Alma Estate in 2017 to provide 993 homes, alongside community and retail uses. Phases 1A (full planning permission) 2A, 2Ai and 2Aii (Reserved Matters) have been progressed through detailed consents, and construction has commenced on site, with first occupations anticipated in March 2019.

To accord with the thrust of the national and regional planning framework, Local Plans should contain policies to optimise the use of land and meet as much of the identified need for housing as possible. Countryside therefore respond to relevant sections of the emerging draft Local Plan for Enfield in the context of the future phases of the Alma Estate.

The response reflects the chapters of the Local Plan. It provides comments in answer to relevant consultation questions set out in the Local Plan Summary Questionnaire, or with reference to specific policies and provisions of the plan where these are not directly covered by consultation questions.

Key Priorities in the draft New Local Plan 2036

Q2 Are there any sites that you would like to see identified as a site capable of contributing towards Enfield's overall housing supply?

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7 Heddon Street
London
W1B 4BD

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Enterprise House
115 Edmund Street
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Paragraph 2.10.1 of the draft plan recognises that the Council is already delivering a successful programme of estate renewal and the delivery of homes at Ponders End is noted as an example of this.

Paragraph 2.10.2 goes on to advise that growth within existing neighbourhoods through renewal and intensification of housing estates will continue to contribute to new homes, jobs and community facilities.

The estate renewal at the Alma Estate, Ponders End is ongoing, and the estate continues to offer a source of housing supply which will contribute to meeting needs for housing in Enfield with significant enhancement to residential quality and promotion of mixed and balanced communities within a sustainable location.

The contribution that sustainable development at the Alma Estate can make to delivering homes and other benefits for the borough should be optimised as proposals for further phases of development are brought forward.

This would this enable efficient and effective use of the sustainable location in accordance with chapter 11 of the National Planning Policy Framework (NPPF) and principles for the Local Plan.

As such, the Alma Estate and its ongoing potential to deliver growth through estate renewal making effective use of the site should be acknowledged as part of the Plan.

Q3

a) Has the Council proposed all rational options for accommodating good growth?

b) What other options should be considered to address the growth and development pressures we face?

c) Are there other sustainable alternatives to delivering the level of development that will support growing population needs of Enfield, protect existing character and yet also create good places to live?

There is an urgent need to deliver a mix of new homes, including affordable homes in Enfield to address London's housing crisis.

The intensification of development around key underground and overground rail stations, and optimising the Council's land portfolio for new development including estate renewal and regeneration programmes both offer sustainable options to deliver some of the growth that is required in Enfield.

Making sure that the opportunities offered by these options are fully and effectively embraced as part of the Plan and new development in the borough will be vital if the Council is to meet identified needs in the borough in a sustainable way.

Countryside therefore fully support the identification of estate renewal and regeneration and development in town centres and around stations as sources of growth as part of the Plan, and these should be a priority before options making use of Green Belt or existing industrial areas are considered to address the need for new housing in the borough.



With regard to estate renewal and regeneration areas, paragraph 2.8.2 of the draft Plan notes in relation to town centres and areas around stations that increased supply of homes (and other uses) could be provided through raised densities and building heights allowing for more growth and that a relaxation in standards of provision of car parking and amenity space may be required to allow enough housing to be delivered.

However, the Plan should be clear that flexibility may be required in other sustainable locations, including estate renewal and regeneration areas such as Ponders End to optimise the potential that these areas offer to meet needs for growth in accordance with the requirements of chapter 11 of the NPPF which requires effective use of scarce land resources.

Q3 d) Are you aware of any sites that are available and deliverable to make a major contribution to meeting needs and can come forward for development within the lifetime of this Plan?

As highlighted in response to Q1, the Alma Estate, Ponders End continues to offer a source of further potential housing supply which can contribute to meeting needs for housing in Enfield together with significant enhancement to residential quality and promotion of mixed and balanced communities in a sustainable location. This site is available and deliverable to make a major contribution to meeting needs within the plan period.

Q3 e) The Mayor's draft new London Plan policies promote higher density development in suburban areas with greater public transport accessibility. Do you think Enfield's growing population can realistically be delivered through:

- *Conversion/extensions to existing buildings*
- *Infill in spaces between buildings*
- *Comprehensive redevelopment of sites*
- *All of the above*
- *And / or other options?*

Countryside are fully supportive of making effective use of land resources to deliver much needed new growth. Providing for higher densities of development in suburban areas than may historically have taken place will be important in helping to deliver sustainable development to meet Enfield's needs for growth in future as part of the overall strategy.

As part of this, opportunities within existing suburban areas including for alterations to existing buildings; infilling of spaces between buildings and more comprehensive redevelopment of sites should be taken, and the Plan should provide for flexibility for new development to come forward of a different character to that which may have historically endured, including tall buildings where these are shown to be appropriate.

Design Excellence

Q5 To meet what will be challenging growth needs for homes, businesses and infrastructure, do you think Enfield's Local Plan should include options to:



- *Set out where more tall buildings (i.e. over eight storeys) could be appropriately supported in the borough to minimise land take?*

Given the availability of land in Enfield and the NPPF requirement at paragraph 137 that all reasonable options for meeting growth have been considered before making changes to Green Belt boundaries, tall buildings have an important role in helping the Council to meet needs for growth and it is vital that the Plan recognises this role and provides support for taller buildings to come forward in appropriate locations to deliver sustainable development.

The identification of appropriate locations should take account of sustainability and connectivity; the contribution that a location can make to accommodating needs for growth; as well as potential impacts of development.

Any areas which are proposed to be particularly identified as being appropriate for tall buildings must be subject to future consultation and review with stakeholders to ensure that the zones are appropriate and that they reflect opportunities within the borough.

Furthermore, while guidelines regarding the height of new development may be helpful, the Plan should make clear that these should be applied with a degree of flexibility that would not preclude building heights above these levels, where this is justified and can be demonstrated to be appropriate as part of a planning application to ensure that suitable opportunities to deliver much-needed growth are not prevented from coming forward.

- *Promote higher densities in lower rise buildings, even if this means compromising some existing standards sought e.g. reducing on-site open space requirements or the size of individual houses/flats?*

The existing character of much of the borough must be balanced against the need to deliver growth in lower-rise areas as part of the strategy to contribute to meeting the pressing need for new housing in the Borough.

As part of this, the Plan will need to ensure flexibility for new development to come forward of a different character to that which may have historically endured, including as a consequence of reduced levels of internal space, open space provision and/or parking as part of high-quality developments which are still able to offer a good standard of living for future occupiers in accordance with London Plan standards.

The Plan should therefore promote higher densities in lower rise buildings in addition to taller buildings as noted above, and should recognise that to deliver this some standards should be applied flexibly in order to make effective use of land.

- *Inform height and density in line with the character of the local area?*

While consideration of the character of the local area will be one aspect that may influence the height and density of new development coming forward, as already acknowledged in the draft plan there is a need for different approaches to



accommodating development in the Borough in light of pressures for growth, including at higher densities.

As such, the character of the local area should not be the only factor which informs height and density.

The sustainability of sites and their connectivity, as well as the need to make most effective use of land resources, should also inform the height and density of new development.

There may also be design justification for promoting a different height or density of development in a specific location.

These factors must also be recognised as aspects that should inform the height and density of new development in Enfield, and proposals should not be constrained by unjustified reference to existing features of a local area. The Plan must also recognise and highlight that new development can and indeed should respond to and evolve the existing character of an area to make more effective use of land.

Meeting Enfield's Housing Needs

Q6 a) In relation to its affordable housing target, should Enfield:

- *Continue to have a policy that seeks a set percentage of affordable homes, such as 40 or 50% that can be evidenced and supported by identified local need, or rely on the emerging London Plan's policy of a minimum of 35% affordable housing, with higher percentages only if there is grant available?*
- *Require all private sector housing development to make some contribution to affordable homes?*

The definition of affordable housing at page 90 of the draft Plan should be updated with reference to the National Planning Policy Framework (NPPF) 2018 to refer to affordable housing for rent; starter homes; discounted market sales housing; and other affordable routes to home ownership.

Draft Policy Approach H2 indicates that the Council has a strategic target of 50% of new homes to be affordable across the borough, although in line with the draft London Plan viability assessments will not be required on sites providing a minimum of 35% affordable housing. This approach is supported in accordance with the London Plan, however we would highlight that delivery in accordance with this target may continue to be a challenge for new development coming forward in the borough and it is important that sufficient flexibility is provided in line with the London Plan so as not to unduly prevent much-needed new development from coming forward.

Q6 b) Should there be

- *Greater flexibility in relation to off-site affordable housing provision where building elsewhere in the borough would provide increases in housing numbers; or*
- *Is it more important to have mixed communities with affordable and market housing provided together?*



The regeneration of Alma Estate will provide a mix of housing types and tenures, enabling the delivery of a mixed and balanced community. Continuation of this approach will be adopted through an optimisation review. Local Policy should seek to ensure residential developments provide a range of housing types and tenures to create sustainable, mixed communities.

Q6 c) In relation to affordable housing tenures, should Enfield:

- *Stick to its current mix for affordable housing of 70% social/affordable rent and 30% intermediate;*
- *Deliver whatever mix of affordable housing need is identified through housing needs evidence, subject to viability of Local Plan requirements;*
- *Secure more social rent to address affordability for residents in priority need even if this actually results in a lower overall percentage of affordable homes being delivered; or*
- *Increase the share of intermediate shared ownership and discounted market products for those looking to buy their own home, which would likely result in a greater range of affordable tenures being delivered overall?*

With regard to affordable housing tenure, Draft Policy Approach H2 indicates a target for at least 30% social rent and London affordable rent; 30% intermediate and 40% to be determined by the Council in line with updated identified need.

The source to be used to determine the 'updated identified need' component should be identified and subject to consultation.

In addition, while it would be appropriate to set out the Council's general approach to tenure targets, these should be applied flexibly according to the circumstances of an individual site or development. These circumstances may justify an alternative tenure mix being provided as part of a development to ensure that needs for housing in the borough can be met most effectively overall. Such flexibility should therefore be referred to within the policy.

Draft Policy Approach H1 Housing Growth and Quality

Draft Policy H1 sets out that the Council will secure conditions to bring forward a sufficient supply of homes to meet needs.

Support within the policy for the regeneration of existing housing estates to help achieve this is welcomed, and will help to provide for mixed and balanced communities and high quality housing.

However, part e) of the draft policy approach states that the net supply of affordable and family units should be maintained or increased. While provision of affordable and family housing will be important in helping to meet needs for housing in the borough, it should also be acknowledged within the policy that there may be circumstances specific to a particular site or development which would justify an alternative approach in order to best meet needs for the borough.



It cannot be assumed that the existing levels of family housing or affordable housing provided on an estate would continue to be the most appropriate and effective way to meet needs in a location. For example, an alternative model of provision as part of redevelopment may:

- better respond to assessed housing needs;
- address the accommodation requirements of existing occupiers;
- meet demand for smaller market or intermediate homes; and/or
- deliver on regeneration objectives for a particular location which may include rebalancing the tenure split of homes available.

As such the policy should incorporate flexibility to enable an alternative approach to affordable and family units as part of a redevelopment where this is justified on the basis of relevant evidence in order to ensure that development proposals can respond effectively to specific needs and individual site circumstances.

Draft Policy Approach H2 Affordable Housing

Draft Policy Approach H2 sets out that the Council will resist development proposals resulting in a net loss of affordable housing provision. However, it should be acknowledged within the policy that there may be circumstances specific to a particular site or development which would justify an alternative approach to best meet needs for the borough.

As such there should be flexibility over any application of this provision, and this flexibility should be reflected in the policy, where evidence is provided.

The Draft Policy Approach also states that the Council will not apply the Vacant Building Credit. However, no justification is provided for this approach which would be contrary to paragraph 63 of the NPPF.

Draft Policy Approach H4 Housing Mix

The approach to seek a choice of homes in the borough is supported. However, Policy H12 within the draft new London Plan requires that Councils are not prescriptive about size and mix for market and intermediate homes, and advises that the mix of unit sizes on a site should be considered with regard to factors including:

- the need for delivery of a range of unit types at different price points across London;
- the nature and location of sites with a higher proportion of one and two bedroom units generally more appropriate in locations which are closer to a town centre or station with higher public transport access;
- connectivity; and
- the aim to optimise housing potential on sites.

While the draft policy approach sets out that residential-led development proposals should deliver a mix of sizes of market and London Affordable Rent housing according to factors including the development site characteristics, local housing need assessment and the need to deliver mixed and balanced communities which provides for some flexibility, it also states that the net loss of family sized units of two or more bedrooms will be resisted.



However, smaller homes, including one-bedroom homes, play an important role in meeting London's housing need. Furthermore, the delivery of smaller homes within the borough can help to provide a greater balance of accommodation reducing the pressure to convert and subdivide larger homes within the area and the occupation of larger homes by sharers who are unable to access alternative housing in an area.

In addition, there may be circumstances specific to a particular site or development which mean that maintaining the existing levels of family housing provision would not be the most appropriate way to meet needs in a location. This may be particularly relevant for estate regeneration proposals where the historic mix of housing may no longer be appropriate to meet needs for housing in an area or to support the creation of balanced communities, and an alternative model of provision as part of redevelopment may:

- better respond to assessed housing needs;
- address the accommodation requirements of existing occupiers;
- meet demand for smaller market or intermediate homes; and/or
- deliver on regeneration objectives for a particular location which may include rebalancing the mix of homes available.

As such, the policy should incorporate flexibility over any approach seeking to avoid a net loss of family sized homes where this is justified by the particular circumstances of an individual site in order to ensure that development proposals can respond effectively to specific needs and individual site circumstances.

Sustainable Movement and Transport

Q15

a) Are there any other ways the Council could reduce private vehicle use, for example through more cycle routes, increased public transport services in bus and rail; new and emerging technologies and investment in east-west rapid bus transit routes?

b) Do you support the strategic transport infrastructure proposals for Crossrail 2, road network capacity improvements and east-west rapid transit connectivity?

c) Are there any other specific improvements to public transport the Council should seek with TfL? For example, Step-free access to particular stations or increase frequency and capacity of key rail and bus routes

d) What policies should the Local Plan include to minimise the impact of freight movements or goods delivery in Enfield? How should alternative fuel technologies be supported that can also assist in facilitating this?

e) Please identify any specific walking and cycling routes that could be improved and how.

From the outset, it is important that new development occurs in locations which are, or which can be, made sustainable including though enabling access for occupiers to a range of services by modes other than the private car, and through facilitating use of public transport, walking and cycling as modes of travel.



Making effective use of land through higher densities of development, and directing increased densities of development to sustainable locations including for example town centres and areas around stations, must be a key component in seeking to meet future needs for growth in the borough. This will help to ensure delivery of development in line with the objective of promoting sustainable travel options in the borough, both by reducing the need to travel and by offering greater support for new and enhanced public transport connections to further improve access.

While the principles set out under Draft Policy T1 to make public transport more accessible and the natural choice for longer trips are generally supported, the policy and supporting text should clarify that development proposals may contribute to bus network infrastructure improvements, cycle routes, walking routes and associated infrastructure through the Community Infrastructure Levy (CIL).

Draft Policy Approach T2 Reducing the Impact of Private Vehicles on Our Streets

In addition to securing a more sustainable local travel network and directing development to sustainable locations, it must also be recognised that the availability of parking is an influencing factor on levels of private vehicle use and the resulting impact on Enfield's environment

Draft Policy T2 advises that the Council will adopt maximum car parking standards and car-lite housing wherever feasible.

The adoption of maximum standards is supported in order to reduce car dependency and help to ensure that proposals make more efficient use of land within the borough to accommodate the required growth.

No details of suggested standards are provided within the draft Plan. However, these should reflect the standards within the London Plan and should in all cases be applied to individual developments flexibly with regard to individual site circumstances.

In addition, while past levels of car ownership in Enfield are acknowledged, given the need to reduce car-dependency and the impact of private vehicles in Enfield, this is not considered to be a justification to depart from the draft London Plan approach that car-free development should be the starting point for all development proposals in places that are (or are planned to be) well-connected by public-transport with developments elsewhere designed to provide the minimum necessary parking ('car-lite').

The policy should therefore also specifically encourage car-free development in order to both promote sustainable modes of transport and the effective use of land, particularly in locations which are close to public transport and where space for parking is constrained.



Summary

In summary, as recognised within the draft Plan and in national and London strategic planning policy, there is a pressing need for the delivery of new homes.

Making effective use of land resources in Enfield, including on land within town centres and around stations and through estate renewal and regeneration areas will be vital to helping the borough to meet challenging needs for growth. It is therefore important that the Plan recognises and encourages growth in appropriate locations to meet needs, but also provides for sufficient flexibility to ensure that the Plan is effective and positively prepared to enable it to meet the needs of Enfield's local communities in future.

I trust that these comments are clear, and Countryside look forward to working with the borough further in future to deliver new homes, however please do contact me should you have any queries.

Yours faithfully

Greg Blaquiere MRTPI
Technical Director

cc

Alex Cook

Countryside Properties

28 February 2019



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Dear Sir/Madam,

**London Borough of Enfield's Proposed New Local Plan 2036 – Issues and Options
Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended)**

Edmonton Green Town Centre

We welcome the opportunity to comment on the London Borough of Enfield's (LBE) Issues and Options consultation document (Regulation 18) on behalf of our client Crosstree Real Estate Partners LLP.

In 2018, Crosstree Real Estate Partners LLP purchased Edmonton Green Town Centre (henceforth referred to as 'the Site') with the ambition of revitalising and reenergising the centre, enhancing an existing piece of the city that will promote long term investment in the area. This initiative will be progressed over the medium term alongside a substantive programme of stakeholder engagement and this process will inform our decision as we proceed. However, it is timely to engage with the plan making process now and we therefore make some initial observations below.

For the reasons set out within this letter, the Site has the potential to be a key hub to the Borough, which will play a strategically important role in the delivery of a new and improved town centre economy, night time economy, employment uses and new homes to help the Borough and London meet the relevant targets and strategic objectives set out in the draft Local Plan.

The first part of this representation provides the relevant background information in relation to the Site, before sequentially providing our observations in relation to the currently drafted Planning Policies of the Regulation 18 document. Where we propose amendments to currently drafted policy text, this is shown in red.

We look forward to working with the Council so that the plan can facilitate sustainable development, responds positively to the Government's agenda for growth, and accords with tests of 'soundness' as set out within the National Planning Policy Framework (NPPF) (2018).

The Site

The Site is situated in the south-eastern part of the Borough of Enfield. The Site is currently designated as a District Centre and is located on the fringe of the Lee Valley Opportunity Area.

The Site is 25 acres, and features a large shopping centre, a daily market, a leisure centre, 754 residential dwellings and over 1,000 car parking spaces. The Sites features high density housing, with low rise buildings situated on the edge of the site including three 25-storeys high residential tower blocks located in the middle of the Site.

Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East..

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The Site has an excellent public transportation accessibility level (PTAL) ranging throughout the site from 5 to 6b (the highest level attainable). Edmonton Green train station is within walking distance, offering regular services to Central London and the surrounding area. Edmonton Green bus station is also located within the site, with a number of additional stops on the periphery road network.

Within the adopted Enfield Core Strategy (2010)¹, the Council identify the area of Edmonton as having a range of complex and persistent social and economic issues facing residents of the area including:

- Crime and fear of crime - with drug use and anti-social behaviour;
- Poor health linked to deprivation with a lack of community and health facilities;
- Low levels of educational attainment, unemployment, low skills levels and a lack of appropriate training facilities;
- Lack of community cohesion; and
- A poor quality environment

Additionally, the retail market throughout the UK is in an evolution with a decline in footfall across the UK and 2018 was the worst year for shopping centre investment volumes since 1997².

Focusing on the Site, it predominantly comprises social housing and features a very limited number of market homes. The Site therefore lacks a mixed and balanced community. The shopping centre is generally in a poor condition and in need of significant investment, refurbishment, footfall and spend.

Whilst there are challenges ahead, Edmonton Green also presents an exciting and significant opportunity to make better use of a well-connected, previously developed site. Our client has the ambition to deliver this much needed regeneration, which will seek to deliver a diverse town centre rooted in a cultured place, that would be recognised within the Borough as the hub for innovation and community, enjoying significant investment and characterised by a thriving town centre and night-time economy.

Representations to Regulation 18 Consultation

We welcome and fully support the Borough's future objectives for Enfield, as stipulated in Page. 37 of the draft Local Plan.

In order to meet these objectives, paragraph 2.7.4 of the draft Local Plan identifies 'broad options' as to where the majority of new development in the Borough could be accommodated. Of relevance to this representation, the Site is identified within the 'broad options' as part of the 'Town Centres and areas around stations', which in Figure 2.2 is also identified as a Growth Option.

¹ Enfield Core Strategy (2010)

² Savills 'High Street and Shopping Centre investment' (January, 2010): https://www.savills.com/research_articles/255800/275143-0

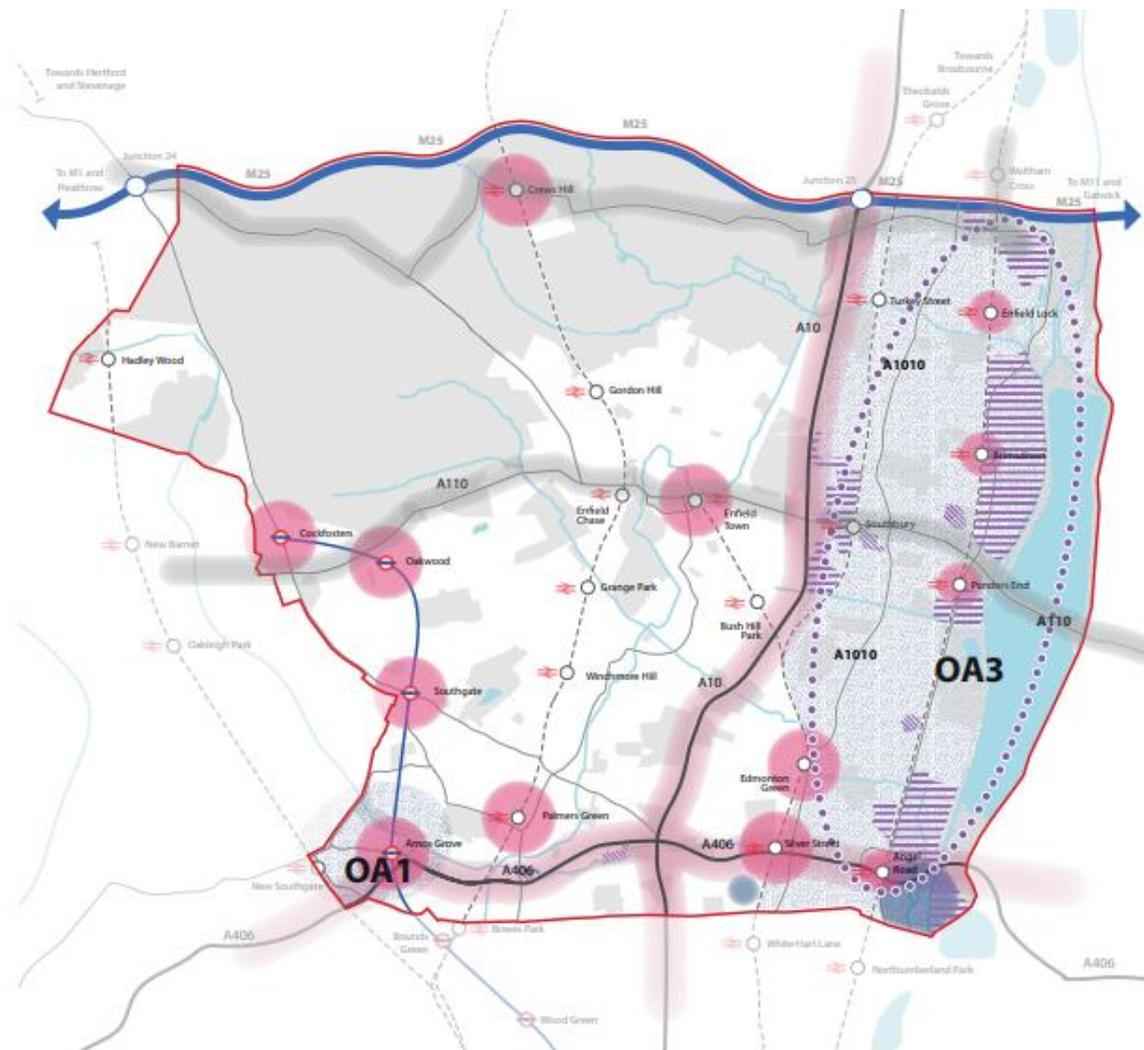


Figure 2.2: Enfield 2036 Growth Options Diagram

Additionally, the site is designated as a District Centre within Figure 2.3. Paragraph 2.8.4 notes Edmonton Green Town Centre as a District Centre, which is a suitable location for **higher density and mixed-use development**.

In order to ensure that the quantum of new homes and jobs required by the emerging Local Plan can be delivered in this Growth Option area, the Site should be designated for mixed-use redevelopment within the emerging Local Plan. This would enable redevelopment of the Site to deliver a mixed-use scheme, a significant number of new homes, new jobs and a new thriving town centre economy.

The remainder of this letter provides commentary on the emerging drafted Planning Policy.

Draft Policy D2 ‘Character and Density’

We support the Council in its objective to identify areas where tall buildings would be appropriate. We also support the aim of draft Policy D2 in seeking to ensure that more tall buildings and higher density development is realised in appropriate places.

However with regards to draft Policy D2 a), we feel that height and density should not be defined by the character of the existing area. In this regard it is relevant to note that restricting height and tall building development to accord with its surrounding character alone would be inconsistent with the emerging New London Plan Policy D8. Draft Policy D8 states that in identifying locations on maps in Development Plans for tall buildings and high density, borough's should take account of not only visual impacts, but also the potential contribution to new homes, economic growth, regeneration and public transport connectivity.

Therefore, where opportunities present themselves to create a new or enhanced piece of city, or to set a new context, these should be encouraged where they create 'place'.

As previously stated, the Site already has existing tall buildings located within the centre of the Site. Therefore, the designated District Centre itself is already of its own character and an aspirational policy approach to height and density would enable a framework to bring forward significant and positive change in this part of the Borough through high density development.

Accordingly, in order to ensure that the quantum of homes and jobs envisaged by the draft Local Plan can be delivered, we propose that the Site be defined within draft Policy D2 as an appropriate place for tall buildings and high density development, we recommend that additional wording is included into draft Policy D2 as follows:

- c. 'Subject to the design requirements of Policies of D1 and D3, the Council will support the development of tall buildings and high density development in Edmonton Green Town Centre.'*

To further consolidate the above, we also propose that the Site is designated as being an area suitable for tall buildings as part of the emerging Policies Map, although no specific heights should be detailed.

In identifying the Site as being suitable for tall buildings, this will ensure that a significant number of homes and jobs can be delivered in this location.

The above amendment to draft Policy D2 is also considered to accord with the emerging New London Plan draft Policy D8 'Tall Buildings', which requires tall buildings to be located as part of a plan led approach to changing or developing areas through identification of such locations on policies maps.

Draft Policy H1 'Housing Growth and Quality'

We welcome the Council's commitment to achieving the identified needs of existing and future households by seeking to deliver at least 1,876 homes per year in the plan period. Additionally, we support draft Policy H1 d) ensuring developments address the need for a variety of different types of homes in the borough and contributes to the creation and maintenance of sustainable communities.

We believe the Site can play an important role in delivering housing for the borough. As previously stated, the site currently provides 754 residential dwellings, which are predominantly social housing in tenure. In order to achieve a mixed and balanced community, we suggest that the promotion of market housing into Edmonton Green will be highly beneficial. Allowing flexibility through the promotion of market housing development in this location will be consistent with London Plan Policy 3.9. Policy 3.9 states that a more balanced mix of tenures should be sought in all parts of London, particularly in some neighbourhoods where social renting predominates and there are concentrations of deprivation.

Likewise, the Draft London Plan GG1 replicates the adopted London Plan policy stating that developments must avoid separation or segregation to help deliver strong and inclusive communities.

In order to accurately reflect the adopted and emerging London Plan position in relation to mixed and balanced communities, we would suggest the following text amendments to draft Policy H1 d).

- d. *'Ensure developments address the need for a variety of different types of new homes both in affordable and market tenures in the borough, which contribute to the creation and maintenance of sustainable communities, particularly in neighbourhoods where social renting predominates and there are concentrations of deprivation.'*

Draft Policy H2 'Affordable Housing'

We fully acknowledge the role which affordable housing plays in the delivery of a varied housing offer to the market and we note the Council's aspiration for achieving a high level of affordable housing across the Borough.

As previously stated, the Site is predominantly social housing. Therefore, we consider draft Policy H2 should be flexible in its wording in the interest of creating a mixed and balanced community. This would also align with the adopted London Plan Policy 3.9 and emerging London Plan Policy GG1

Draft Policy H2 sets a strategic target of 50% additional housing delivered across the borough to be affordable. We propose the additional wording be added to draft Policy H2, so that the policy recognises that the strategic target figure should not always be required in the interest of creating a mixed and balanced community.

'In areas where social renting predominates and there are concentrations of deprivation; the Council will work with developers to identify an appropriate mix of tenures in the interest of creating economically sustainable places with a mixed and balanced community.'

Draft Policy TC2 'Successful town centres'

We welcome the draft policy and guidance towards the future of town centres within Enfield. We note Paragraph 7.2.2 states *"There is a need for our town centres to be successful as economic places or destinations in their own right, whilst promoting the overarching objective and delivering growth"*. This statement captures our client ambitions for the Site.

We note that the Site is designated within the draft Local Plan as a District Centre and is therefore second within borough's hierarchy of town centres after Enfield Town Centre. Draft Policy TC2 g) states that new development for town centre should not negatively impact on the existing town centre hierarchy. We consider the Site has the potential to be a key town centre within the Borough of Enfield for innovation, networking and a place for business. With continued investment we consider Edmonton Green to have great potential to create a thriving town centre that would provide residents of Enfield with a place to work, live, shop and carry out many other leisure exercises. This investment should not be discouraged based on a previous hierarchy and we suggest part a) of the policy to be deleted.

We acknowledge the Council's desire for a varied mixture of town centres uses as stated in draft Policy TC2. The promotion of flexibility of uses within town centres through the introduction of 'meanwhile' uses, as stated in draft Policy TC3 and the enticement of cultural attractions to town centres will be highly beneficial to the future of the Site.

Also, we fully support the Borough of Enfield's decision to remove the general guidelines for A1 retail units within primary and secondary shopping areas of town centres, as stipulated in Paragraph 7.2.10. We believe this will enable a greater flexibility in terms of curation of place and will allow the Site to adapt to the changing retail environment, which is key to regeneration and growth, particularly in the current retail climate.

We note the Council's wish to redevelop surplus car parking within town centres. We consider this is beneficial in terms of unlocking the potential to deliver alternative uses in their place which could assist in the regeneration of the Site.

Draft Policy TC4 'Evening and night time economy'

We welcome the Council's ambition to encourage a night time economy within town centres as set out in draft Policy TC4. We consider that the policy reflects the ambition of the draft London Plan, as stipulated in Policy HC6 supporting the night-time economy.

Paragraph 7.4.4 of the draft Local Plan states *'the Council wishes to encourage this activity and further opportunities to enhance the night time economy especially in town centres'*. Yet, draft Policy 2.7 focuses heavily on evening economy within Enfield Town. We consider that Edmonton Green has the potential for a thriving evening economy that will encourage greater footfall in the town centre. This would bring benefits for the local economy and would help the centre tackle issues around crime and disorder. The creation of a 'place' in Edmonton Green for longer periods of the day will ensure a greater offer to the local community.

Currently, Enfield is not identified within the London Plan as having a night time economy, we consider the Site has the potential to provide this. The town centre has an excellent PTAL and therefore is easily accessible from surrounding areas. Additionally, the promotion of 'meanwhile uses' as set out in draft Policy TC3 would give the owners flexibility to promote the introduction of facilities such as Box Park to the town centre, as highlighted in paragraph 7.3.1 of the draft Local Plan. The investment our client wishes to deliver to the Site and the support for a night time economy will help transform the town centre, which will subsequently deliver a new economy, visitors and further investment.

Conclusion

Edmonton Green Town Centre comprises a high level of social housing, a neglected shopping centre and significantly underused car parking. We consider that Edmonton Green is in significant need of investment and it provides an exciting opportunity for growth to benefit the local community.

The Site is designated within the Growth Option areas and as a District Centre as detailed within the emerging Local Plan.

Our client has the ambition to create a cultured and diverse town centre, that would be recognised within the Borough of Enfield as the hub for innovation and diversity with a thriving town centre and night-time economy.

Thank you for giving us the opportunity to comment on the emerging draft Local Plan (Regulation 18). We would be grateful for confirmation of receipt of these representations and look forward to working with you throughout the Local Plan progress.

Please do not hesitate to contact us on the details at the head of this letter should you require any further information.

Yours faithfully,

Savills

Planning Policy Team
London Borough of Enfield
Silver Street
London
EN1 3XA

28th February 2019

Dear Sir/Madam,

Representations to the London Borough of Enfield Local Plan 2036 – Issues and Options

On behalf of our client, Henry Boot Developments Ltd, who have entered into a Joint Venture partnership with the London Borough of Enfield (“LB Enfield”) to deliver enhanced industrial and employment-generating uses at the Montagu Industrial Estate (“the site”), GL Hearn is pleased to hereby submit the following representations to the emerging *Enfield – Towards a New Local Plan 2036 (Issues and Options Draft)* (hereafter: “Draft Local Plan”).

Background Information

Together with LB Enfield, our client is in the process of developing a masterplan for the delivery of enhanced industrial and employment-generating uses at the Montagu Industrial Estate which constitutes a large industrial estate located to the south of the borough in close proximity to Meridian Water and the North Circular (A406). Within the adopted Development Plan, emerging Edmonton Leaside Area Action Plan and the Draft Local Plan, the site is allocated as both part-Strategic Industrial Location (“SIL”) and part-Locally Significant Industrial Estate (“LSIS”). The site is also located within the Upper Lea Valley Opportunity Area.

As set out above, our client is pursuing opportunities to redevelop (parts of) the site, in a joint venture partnership with LB Enfield, to provide a mix of industrial/employment-generating uses expected to fall within Use Classes B1, B2 and B8 of *The Town and Country (Use Classes) Order 1987 (as amended)*. Following initial engagement with LB Enfield, our client seeks to enter into a formal pre-application process in due course.

Representations

The purpose of the Draft Local Plan is to guide and accommodate future housing, economic and infrastructure growth in the borough up to 2036. It should be in general conformity with national policy contained in the National Planning Policy Framework (2018 as amended) and supporting Guidance Notes and Circulars as well as regional guidance and policies produced by The Mayor of London (i.e. the London Plan and its Supplementary Planning Guidance; and the emerging Draft London Plan which is expected to be adopted by the time the Draft Enfield Local Plan is independently examined).

To inform more detailed future representations, it would be beneficial to have sight of the Council’s Employment Land Review (as referred to in para. 6.2.2 of the Draft Local Plan) which our client hopes will be made available prior to the next round of consultation (i.e. at Regulation 19 stage).

Vision and Objectives

Whilst these representations predominantly focus on Chapter 6 of the Draft Local Plan and/or Question 10 of your questionnaire, it is important to note that our client is supportive of the vision and aspirations contained

in the document. The **Draft Vision for Enfield** (page 36 of the Draft Local Plan) sets out the Council's aspiration of increasing competitiveness between *"the borough's employment areas to attract regional, national and international investors across all sectors, and to successfully deliver new jobs and training opportunities for local residents"*. In addition, **Objective 1** outlines the Council's commitment to enhancing the quantity, quality and density of the borough's SIL and LSIS land.

This approach and the Council's overall aspiration to improve its industrial and employment-generating floorspace is welcomed by our client, especially in light of the proposed redevelopment of Montagu Industrial Estate which seeks to meet these objectives in order to provide flexible accommodation for (local) businesses and occupiers.

Policy E1 (Business and Job Growth)

Policy E1 sets out the Council's commitment to attracting investment, supporting the existing business base and creating dynamic business environments. This will be achieved through the development of high quality premises and places. This emphasis of increasing the quality of business space, and their environs, is strongly supported by our client.

Part (b) of the draft policy recognises and promotes the role of SIL and LSIS in accommodating the evidenced needs of businesses, visitors, the economy, the environment and Enfield residents, and encourages development within SIL and LSIS to make the most efficient use of land. This policy accords with national and regional planning policy, and therefore is supported by our client.

Parts (d) and **(g)** explain that the Council will direct office development (Use Class B1(a)) and small-scale start-ups to town centre locations. Whilst it is understood that the Council's town centres will accommodate the majority of B1(a) office space, it should be acknowledged that LSIS and SIL are suitable locations for a wide range of office uses, not limited to those ancillary to the main industrial/employment-generating uses. Whilst SIL and LSIS are important locations to meet the Council's industrial/employment-generating floorspace demand, the draft policy needs to be flexible enough to be able to adequately respond to changes in market demand over the plan-period and similarly any development coming forward should be able to accommodate a range of employment-generating uses, as required by **Paragraph 81** of the **NPPF** which is worded as follows:

"Planning policies should:

- a) set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration;*
- b) set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period;*
- c) seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment; and*
- d) be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices [...], and to enable a rapid response to changes in economic circumstances."*
(our emphasis)

Notwithstanding, it is acknowledged that B1(a) floorspace in such locations would normally be expected to complement B1(c), B2 and B8 floorspace, and provide a mixed and diverse business environment. If required, an overall threshold can be applied/conditioned where necessary.

Policy E2 (Approach to Employment Land)

Policy E2 states that the Council seeks to make more efficient use of employment land to support economic growth sectors and to increase job density. This will be achieved through the retention and intensification of LSIS and SIL. Any intensification is expected to demonstrate that SIL and LSIS maintain or increase capacity,

and do not lead to a net loss of functionality. This principle is generally supported by our client (who believes that the above site is ideally for intensified employment use in response to **Question 10c**), although a greater emphasis should be placed on improving the quality of existing SIL/LSIS whilst targeting no overall net loss and making effective use of land in line with Chapter 11 of the NPPF, particularly Paragraph 117 which requires:

“Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses [...]” (our emphasis)

Furthermore, **Policy E2** considers that LSIS and SIL are appropriate for B1(b), B1(c) B2, B8 uses, appropriate sui generis employment uses including waste, utilities and transport depots, and other supporting facilities; including B1(a) uses where ancillary in scale and function. As set out above, it is recommended that a degree of flexibility is added to allow for wider B1(a) uses to come forward in SIL/LSIS to ensure that the borough’s employment-generating areas can respond to potential changes in market demand during the plan period. This is on the basis that B1(a) floorspace is considered to be suitable for many industrial estates, such as a redeveloped Montagu Industrial Estate, and can assist in diversifying and complementing other B1(b/c), B2 and B8 uses.

Part (j) welcomes employment-led schemes in LSIS that include housing and live/work units as long as it does not prejudice the ongoing use of the area for business purposes, there is no net loss of employment floorspace, and where residential use is compatible with existing employment uses. Whilst the Council’s ambition is acknowledged, it needs to be recognised that residential uses are not suitable for many industrial sites, and therefore, should only be sought on LSIS with a good accessibility of public transport as well as complementing surrounding uses. Existing industrial locations such as Montagu Industrial Estate with a low PTAL rating (i.e. an average of 1b) and/or a SIL designation are not considered to be suitable to accommodate residential units without compromising its actual functionality (again see **Question 10c** it is not considered that the site would be suitable for a mixed use development including residential uses). The Council is encouraged to consider these uses in more accessible (i.e. in close proximity to rail stations and/or along the A10 corridor) or ‘cleaner’ industrial locations, such as ‘Industrial Business Parks’.

Policy E4 (Supporting Small Businesses)

Policy E4 sets out the Council’s commitment in supporting new and existing businesses through seeking the provision of new business floorspace, such as incubator space as part of employment-led/mixed-use schemes in SIL, LSIS and/or non-designated employment areas. Our client supports the aspiration of providing a range of unit types and sizes within such sites as a means of catering to the needs of local businesses and encouraging diversity.

Relevant adopted policy to be brought forward

Furthermore, it is requested that elements relating to *non-B1, B2 and B8* uses contained in adopted **Development Management Policy DMD 21 (Complementary and Supporting Uses within SIL and LSIS)** are brought forward into the new Local Plan.

Policy DMD 21 provides guidance on *non-B1, B2 and B8* uses that might be considered acceptable in SIL and LSIS to support and complement their function. For instance, the policy supports the provision of essential crèches and cafes that would support the everyday needs of the industrial occupiers. The policy also encourages the provision of ground floor retail space, providing that this does not become a dominant use (comprising over 10 per cent of the overall floorspace of units). The provision of ancillary uses as part of the redevelopment of a SIL/LSIS site is considered to be an important factor in ensuring the long-term (economic) success of employment-generating areas in the borough.

Summary

Having reviewed the Draft Local Plan (Issues and Options), our client is generally supportive of the emerging policies in the Draft Local Plan and the Council's growth aspirations, especially where they seek to make qualitative and quantitative improvements to SIL and LSIS. However, in order to ensure that policies are justified, it is suggested that further consideration is given to adding flexibility where this allows a response to market demands over the plan period (i.e. allowing the inclusion of B1(a) floorspace into SIL and LSIS). Our client also recommends that the importance of improving the quality and efficiency of SIL and LSIS is emphasised within Policies E1, E2 and E4. In addition, Policy E2 should reiterate that residential uses are only suitable on selected and accessible LSIS sites.

Should you require any further detail/clarification at this stage, please do not hesitate to get in touch with my colleague Christopher Schiele (Christopher.Schiele@glhearn.com) or myself at this office. We are looking forward to continuing our proactive discussions with LB Enfield to assist the Council in working towards preparing a sound and deliverable Local Plan.

Yours sincerely

Nick Diment
Planning Director

**London Borough of Enfield draft Local Plan
2020-2036 Issues and Options
Representations to Regulation 18
Built Heritage**

February 2019

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1. Introduction

Purpose of and Context for this Report

- 1.1 These representations set out in this report have been prepared by Turley's specialist built heritage team on behalf of Hermes Property Unit Trust ('Hermes' and our 'Client') in response to the London Borough of Enfield's ('LBE' or the 'Council') consultation on the draft new Local Plan 2020 – 2036 Issues and Options.
- 1.2 This is intended to provide professional commentary on the soundness and deliverability of the emerging Local Plan, in particular with regard to emerging local planning policy and guidance in relation to development affecting the significance of built heritage assets. These representations are made in light of the relevant statutory duties of the Planning (Listed Building and Conservation Areas) Act 1990 ('the Act'), prevailing National Planning Policy Framework (the 'NPPF') 2019 (and as updated 2019) and supporting National Planning Policy Guidance (NPPG) from 2014, the draft new London Plan 2017, and national best planning practice and advice from the DCMS and Historic England.
- 1.3 As further context relevant to these representations, our Client is promoting a Site within the LBE's parallel Call for Sites consultation for the redevelopment of Blackhorse Tower, Holbrook House and Churchwood House, No.116 Cockfosters Road. The Site already benefits from a resolution to grant planning permission by LBE's Development Control Committee, subject to finalising the Section 106 Agreement for the redevelopment of the Site for 164 residential units and 5,262 sqm of mixed use development (LBE application reference: 16/04133/FUL). Accordingly, Turley are seeking an allocation for this Site as part of the Local Plan process; and the delivery of residential-led mixed use development on this Site.
- 1.4 These representations should be read alongside complementary and broader planning representations prepared by our colleagues at Turley in relation to the Site and the emerging Local Plan as a whole. Turley set out broad support for the objectives of the draft Local Plan, but also advocate a number of recommendations to strengthen the soundness and deliverability of this Plan.

Structure of this Report

- 1.5 Firstly, this **Section 1** establishes the purpose and context of this report and also its structure, with regard to our representations on the draft Local Plan.
- 1.6 Reference is made to the statutory duties of the Act, national policy in the NPPF and as supported by NPPG, and the draft London Plan, as well as other relevant national planning guidance and advice for development within the historic environment. This is set out in full for ease of reference at **Appendix 1**.
- 1.7 **Section 2** comprises our representations on behalf of our Client, and commentary on / recommendations for strengthening; the soundness and deliverability of the emerging Local Plan, in relation to development affecting built heritage assets and the Site at

Cockfosters. This is considered in light of the prevailing national and regional planning policy and guidance requirements (as well as the overarching legislation, as relevant).

- 1.8 Our representations also include further commentary on the draft Heritage Strategy 'Making Enfield' supplementary planning document to the draft Local Plan, which also forms part of this public consultation.

2. Local Plan 2020-2036 Issues and Options

Chapter 2: Promoting Good Growth Options in Enfield

- 2.1 Chapter 2 (Promoting good growth options in Enfield) of the draft new Local Plan addresses the development needs of the Borough; looking at creating a vision for Enfield and its broader growth objectives.
- 2.2 With regard to growth objectives (section 2.6), we support the Council's recognition that the aim to "*Respect and enhance the character of the borough's cultural, built heritage and neighbourhoods; ...*" can be achieved alongside and as part of the wider Objective 1 for promoting and managing growth within the Borough.
- 2.3 Draft Objective 3 relates to enhancing Enfield's assets, which also includes the aim "*To enhance the unique historic environment of Enfield and the character, distinctiveness of the borough's conservation areas and other historic and valued buildings, cultural, spaces and places; ...*" Again we support the Council's recognition here, and also as part of the broader draft document, that new development itself can have a positive role in providing opportunities to enhance or better reveal the significance of heritage assets.
- 2.4 As context, paragraph 185 of the NPPF sets out that development plans should set out a positive strategy for the conservation and enjoyment of the historic environment. 'Conservation' is the key word here, which is defined in Annex 2; Glossary as "*The process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance.*" (our underlining). Conservation is not a process that should prevent change or stymie development, where proposals can be shown to have been well-informed and well-designed, seek to avoid, minimise and or mitigate any harm to significance, and are able to deliver public / planning benefits (including potentially heritage benefits).
- 2.5 The draft London Plan aligns with / reiterates this approach to achieving an appropriately sustainable balance between new development and the conservation of heritage assets. This is more clearly set out in the wording of draft Policy HC1 – entitled heritage conservation and growth.

Chapter 3: Enhancing Heritage

- 2.6 Chapter 3 (Enhancing heritage) relates to development affecting heritage assets and the wider historic environment; setting out a number of recommended draft policy approaches. In this sub-section we provide commentary / recommendations in relation to these policies of the draft Local Plan, specifically in relation to development affecting built heritage assets.
- 2.7 In the preamble to these policies, we support the Council's recognition that "*... design quality can contribute much to conserving and enhancing heritage as part of good growth.*" (para. 3.1.11) Again, this approach accords with policy guidance set out in both the NPPF and draft London Plan, which establishes that promoting new development and conserving heritage assets should not necessarily be processes in conflict, but can be a positive and sustainable relationship.

- 2.8 This is again reiterated in this section of the draft Local Plan (para. 3.1.12) in setting out that “... *Heritage is therefore about positive management of change making positive use of heritage assets and their settings for regeneration and placemaking engaging communities and promoting design quality.*”

HE1 (draft policy approach: Design quality and local character)

- 2.9 We broadly support the objectives of this draft policy with the new Local Plan, with regard to development affecting built heritage assets, and also how this relates to good design. We do advocate, however, a number of recommendations to strengthen its soundness, in general terms and also in relation to our Client’s interests in the Site at Cockfosters.

- 2.10 The **second paragraph and sentence** of this draft policy sets out that “... *The Council will ensure that projected growth in the forthcoming plan period helps to conserve and enhance the quality and character of Enfield’s historic environment and heritage assets and their settings, in line with relevant national and London Plan policy, legislation and best practice guidance*” (our underlining).

- 2.11 We recognise that the NPPF (Chapter 16) establishes the desirability of considering conserving and enhancing the historic environment (including heritage assets) as part of the process of decision making for planning proposals, which is set out in paragraph 185 with regard to plan making, and also paragraph 192 with regard to determining applications.

- 2.12 However, when considering the impact of development on the significance of a (designated) heritage asset, paragraph 193 establishes the principle that “... *great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be)*”. Again, ‘conservation’ is the key word here, which is defined in Annex 2; Glossary as “*The process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance.*” (our underlining). There is no clear requirement here and in national policy guidance for development to both conserve and enhance heritage assets; rather that the conservation of heritage assets could be achieved by sustaining that asset’s significance, and only where appropriate also enhanced. The relevant policies of the draft London Plan accords with national policy guidance in this matter.

- 2.13 This position is further underlined by the overarching statutory duties of the Act in relation to the designated heritage assets of both listed buildings and conservation areas. For planning applications affecting listed buildings, Section 66(1) imposes the following duty:

“In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.”

- 2.14 Preservation or ‘preserving’ is the key word here, the meaning of which is taken in this context to be the avoidance of harm. There is no explicit requirement for the special interest (significance) of listed buildings to be enhanced.

- 2.15 With regard to applications within conservation areas, the Act outlines in Section 72(1) that:

“In the exercise, with respect to any buildings or other land in a conservation area, of any powers under any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.”

- 2.16 This other duty is satisfied if development does one thing or the other; i.e. preservation or enhancement, although there could of course be cases where proposals both preserve and enhance the character or appearance (significance) of a conservation area. The meaning of preservation is again taken to be the avoidance of harm.

- 2.17 Therefore, in order for this draft policy to be consistent with national policy (and legislation) it is recommended that the wording of the second paragraph be revised to read as “... *The Council will ensure that projected growth in the forthcoming plan period helps to conserve and or enhance the quality and character of Enfield’s historic environment and heritage assets and their settings, in line with relevant national and London Plan policy, legislation and best practice guidance*” (our underlining).

- 2.18 The ***last sentence of the third paragraph*** of this draft policy sets out that “... *All heritage assets and aspects from all parts of the borough are recognised as important, worth protecting and enhancing and as an opportunity to inform and contribute toward well-designed places*”.

- 2.19 To better accord with the principles established by national policy and legislation for development affecting heritage assets, it is recommended that wording is revised, and / or supplemented, to recognise the need for proportionality in both plan making and decision making for differently identified heritage asset types. In particular a recognition that the content / wording of relevant legislation and national policy establishes a hierarchy in the level of planning control and policy protection, and therefore implied levels of importance, between different heritage asset types (for example between designated – often nationally important, and non-designated – often locally important, heritage assets).

- 2.20 This draft policy further sets out two criteria that the Council would expect development proposals to accord with. The ***second bullet point and sentence*** requires development to “... *Demonstrate a clear understanding of the borough’s unique heritage and how proposals will conserve and enhance that character, using available published and archival resources including the GLHER*” (our underlining).

- 2.21 Again, and as set out previously and similarly in the commentary of this section, for this draft policy to be consistent with legislation and national policy it is recommended that the wording of this sentence be revised to read as “... *Demonstrate a clear understanding of the borough’s unique heritage and how proposals will conserve and or enhance that character, using available published and archival resources including the GLHER*” (our underlining).

HE2 (draft policy approach: Designated heritage assets, their setting and archaeology)

- 2.22 Within the **preamble** to this draft policy (para. 3.3.1) designated heritage assets are defined in error to also include 'London Squares'. Annex 2; Glossary of the NPPF defines designated heritage assets as "A World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under the relevant legislation" only. It is recommended therefore that this wording be revised to omit London Squares.
- 2.23 Paragraph 3.3.3 continues the discussion with regard to 'designated' heritage assets, which is the title and relevant matter for this section (3.3) of this Chapter. The use of the word 'local' to describe heritage assets in the first sentence of this paragraph could, however, suggest reference to non-designated heritage assets (i.e. heritage assets identified by the local planning authority (including local listing) that are not designated under the relevant legislation as set out in Annex 2; Glossary of the NPPF). This wording comes with the potential risk of confusing the reader as to the application of this policy only to designated heritage assets rather than to non-designated heritage assets, which are otherwise addressed separately under section 3.4 and draft policy HE3.
- 2.24 It is recommended, therefore, that a clearer distinction is made in the final wording of the draft Local Plan between designated and non-designated heritage assets; in particular where policies have been designed to apply separately and / or differently to these heritage assets types. This is a general comment and recommendation that applies across the wording for both sections 3.3 and 3.4.
- 2.25 In relation to **draft policy HE2**, which relates to development affecting designated heritage assets and their settings, it has been identified that our Client's Site at Cockfosters falls within the setting of a number of designated heritage assets including listed buildings, a registered park and garden, and a conservation area. Accordingly, a combined Built Heritage, Townscape and Visual Impact Appraisal report was prepared by Turley in support of the now approved application for planning permission for development on this Site, which described the likely impacts of proposed change on the significance of heritage assets.
- 2.26 We broadly support the objectives of this draft policy in relation to designated heritage assets specifically. We do advocate, however, a number of recommendations to strengthen its soundness, in general terms and also in relation to our Client's interests in the Site at Cockfosters.
- 2.27 As an introduction to its objectives, the **first paragraph and sentence** of this draft policy states that "...The Council will aim to conserve and enhance the character and appearance of the borough's heritage assets in accordance with the following: ..." (our underlining).
- 2.28 Again, and as set out previously and similarly in this section in relation to draft policy HE1, for this draft policy also to be consistent with legislation and national policy it is recommended that the wording of this sentence be revised to read as "...The Council will aim to conserve and /or enhance the character and /or appearance of the borough's heritage assets in accordance with the following: ..." (our underlining).

- 2.29 Alternatively, the use of the key word ‘significance’ rather than ‘character and appearance’ would again better reflect national policy and its objective for the conservation of heritage assets to sustain and, where appropriate, enhance the significance of assets. Legislation does employ the words character and appearance in Section 72(1), although only in relation to conservation areas. The word significance applies to all heritage assets and is clearly defined in Annex 2; Glossary to the NPPF, and as supported by Historic England’s best practice guidance / advice.
- 2.30 **Criteria a)** (second paragraph) of this draft policy sets out that *“Development affecting heritage assets will only be supported with relevant evidence and undertaken in a manner appropriate to the asset’s significance; ...”* (our underlining)
- 2.31 Related to this requirement, paragraph 189 of the NPPF states that *“In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance ...”* It is recommended, therefore, that the word ‘relevant’ be substituted for the word ‘proportionate’ to provide greater clarity as to any supporting information requirements, and be consistent with national policy.
- 2.32 **Criterion c)** (fourth paragraph) of this policy sets out that *“Proposals should be sympathetic to and respond to the setting of local heritage assets. Proposals that would significantly harm the setting of a local heritage asset will be refused”* (our underlining). This is a further example of the use of the word ‘local’ to describe a heritage asset, which could (as set out previously in this section) potentially lead to confusion as the application of this policy to non-designated as well as designated heritage assets. This should be clarified through revised wording as a recommendation.
- 2.33 Again, **Criterion c)** (fourth paragraph) of this policy sets out that *“Proposals should be sympathetic to and respond to the setting of local heritage assets. Proposals that would significantly harm the setting of a local heritage asset will be refused”* (our underlining).
- 2.34 It is understood / interpreted that this criterion of the policy does not mean that any development within the setting of a designated heritage asset that results in harm to its significance would be refused in principle, rather in cases where the level of any such harm would be ‘significant’. However, this measure of ‘significant harm’ is not clearly defined in this policy or its supporting wording. Nor does this measure relate to the definition of levels or magnitude of harm to heritage significance as described in the NPPF and also its supporting NPPG.
- 2.35 Paragraph 194 of the NPPF states that *“Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification ...”* This statement does not indicate that any development within the setting of a designated heritage asset that would result in harm to significance would be unacceptable in principle, rather that in seeking first to avoid, minimise and or then mitigate harm such development would require robust justification to secure planning permission.

- 2.36 Paragraphs 195 and 196 define the different measures of “substantial harm” and “less than substantial harm” to heritage significance (also further described in NPPG), and also the relevant policy implications / tests for each. As set out in paragraph 196, for example, *“Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.”*
- 2.37 It is recommended, therefore, that the existing wording of this criteria of the policy is revised to better reflect national policy and guidance and their definitions, and so to provide improved clarity for applicants.
- 2.38 In addition, wording in this criterion relating to development causing ‘harm to setting’, rather than harm to significance as a result of change within the setting of a heritage asset, is potentially at risk of being misinterpreted by applicants and / or decision makers. Historic England’s Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets 2017 (2nd Edition) makes it clear that *“Setting is not itself a heritage asset, nor a heritage designation, although land comprising a setting may itself be designated (see below Designed settings). Its importance lies in what it contributes to the significance of the heritage asset or to the ability to appreciate that significance ...”* (para. 9). Therefore, it is further recommended that wording is revised to better reflect such national guidance.
- 2.39 The **fifth paragraph** of this policy generally accords with national policy in requiring a Heritage Statement from applicants to support applications affecting designated heritage assets. This is set out in paragraph 189 of the NPPF, which states that *“In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance ...”*
- 2.40 It is recommended, however, that the word ‘proportionate’ be introduced to the wording of this policy paragraph to provide greater clarity as to any supporting information requirements, and so be consistent with national policy.
- 2.41 The **fourth bullet point following the fifth paragraph** of this policy requires that any Heritage Statement includes: *“Any supporting information required to assess the impact of proposals.”* It is our view that this requirement / criterion would benefit from further clarification and or greater precision to better assist applicants in understanding the appropriate level of supporting information required, or not required, for such applications. It is recommended, therefore, that the words ‘proportionate’ and ‘relevant’ be introduced to provide that greater definition and also ensure proportionality.
- 2.42 The **tenth paragraph** of this policy states that: *“Intelligent design will be required to ensure that any planned changes conserve and enhance the heritage value of an asset and its setting rather than diminishing this”* (our underlining). In relation to the first underlining, we would recommend that the wording be revised to become “conserve and / or enhance” to be consistent with legislation and national policy.

2.43 In relation to the second underlining, it is our recommendation that the wording is further revised; replacing the words “heritage value” with “significance”. The use of this alternative word would better reflect national policy and its objective for the conservation of heritage assets to sustain and, where appropriate, enhance the ‘significance’ of these assets. The word significance applies to all heritage assets and is defined in Annex 2; Glossary to the NPPF. The term ‘heritage value’ is not specifically defined in the NPPF or NPPG, but perhaps relates to past English Heritage guidance ‘Conservation Principles, Policies and Guidance’ dating from 2008 that was intended mainly to guide their staff on best practice. This other guidance document pre-dates the first issue of the NPPF in 2012 and NPPG in 2014, sits below Historic England Historic Environment Good Practice Advice in Planning Notes and also Advice Notes in the hierarchy of guidance, and itself is now due for revision following past public consultation.

HE3 (draft policy approach: Locally listed and undesignated heritage assets and cultural practices)

2.44 In relation to ***draft policy HE3***, which relates to development affecting non-designated heritage assets, it has been identified that our Client’s Site at Cockfosters falls within the setting of a number of non-designated heritage assets including locally listed buildings. Accordingly, a combined Built Heritage, Townscape and Visual Impact Appraisal report was prepared by Turley in support of the now approved application for planning permission for development on this Site, which described the likely impacts of proposed change on the significance of all heritage assets within the defined study area of the Site.

2.45 We broadly support the objectives of this draft policy in relation to non-designated heritage assets. We do advocate, however, a number of recommendations to strengthen its soundness, in general terms and also in relation to our Client’s interests in the Site at Cockfosters.

2.46 The ***third paragraph and following first bullet point*** of this policy states that “*We will expect development proposals to: Enhance and protect local heritage and cultural assets and cultural practices; and ...” (our underlining). In relation to the first underlining, we would recommend that the wording be revised to become “sustain and / or enhance” to be consistent with requirements of national policy for all heritage assets.*

2.47 It is recognised that that heritage is a broad definition and could also include more intangible elements alongside built heritage assets. However, the NPPF and the NPPG do not provide a specific definition for “cultural practices”, but instead provide national policies and guidance that relate to managing development affecting heritage assets and the wider historic environment. It is recommended therefore that further supporting wording is provided in the plan to this draft policy and / or provided within an up to date and relevant supplementary planning document to provide greater clarity and guidance on this matter at the local level.

2.48 The ***second bullet point*** or criterion states that “*... Aim to increase public access to and understanding of designated and undesignated heritage assets” (our underlining). This is a further example of the use of words to describe both designated and non-designated heritage assets within a policy that is otherwise titled to relate specifically only to*

managing change affecting non-designated heritage assets. Again there is a potential risk of confusion, which should be clarified through revised wording as our recommendation.

HE4 (draft policy approach: Views)

- 2.49 In relation to **draft policy HE4**, which relates to development affecting views, it has been identified that our Client's Site at Cockfosters includes what has been defined at application stage to be a tall building for the local area, and which appears in a number of local and longer distance views. Accordingly, a combined Built Heritage, Townscape and Visual Impact Appraisal report was prepared by Turley in support of the now approved application for planning permission for development on this Site, including the analysis of a number of representative views (through use of Accurate Visual Representations (AVR)).
- 2.50 We broadly support the objectives of this draft policy in relation to views. We do advocate, however, a number of key recommendations to strengthen its soundness, in general terms and also in relation to our Client's interests in the Site at Cockfosters.
- 2.51 The **first paragraph** of this policy identifies the Council's objective to protect both strategic and local views. This generally accords with Policy HC3 (Strategic and Local Views), and also Policy HC4 (LVMF), of the draft London Plan, and their supporting wording. However and importantly it is our recommendation that further supporting wording is provided in the plan to this draft policy and / or provided within an up to date and relevant supplementary planning document to demonstrate the robustness of the Council's methodology and approach for the identification, definition and management of 'local views' across the Borough.
- 2.52 This would / should follow guidance provided in Historic England's Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets 2017 (2nd Edition), and also comply with criterion G of Policy HC3 of the draft London Plan which sets out that:
- "Boroughs should clearly identify important local views in their Local Plans and strategies. Boroughs are advised to use the principles of Policy HC4 London View Management Framework for the designation and management of local views. Where a local view crosses borough boundaries, the relevant boroughs should work collaboratively to designate and manage the view."*
- 2.53 The **second paragraph** of this policy states that "All proposals, including those for tall buildings, will be assessed regarding their impact on views, these include: ..." (our underlining). A specific definition for "tall buildings" is not provided in the supporting wording of this policy, nor reference to other relevant national guidance on the matter. It is recommended therefore that further supporting wording is provided in the plan to this draft policy and / or provided within an up to date and relevant supplementary planning document to provide greater clarity and guidance on the definition and approach tall building developments, and also local views, across the Borough. This would / should follow guidance provided in Historic England's Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets 2017 (2nd Edition) and also their Advice Note 4: Tall Buildings dating from 2015.

- 2.54 The **first bullet point following the second paragraph** is a requirement or criterion which states that *“Within the boundary or in the immediate vicinity of, or along views to, or from designated heritage assets including conservation areas; statutorily or locally listed buildings; scheduled or locally listed ancient monuments; and statutorily or locally registered historic parks and gardens; ...”* Again there is a potential risk of confusion between designated and non-designated heritage assets, which could be clarified through slightly revised wording.
- 2.55 The **sixth paragraph** of this policy relates to a requirement by the Council to submit Accurate Visual Representations for a development proposal as it would appear within the local area. This is best practice, in particular for tall or larger scale development and / or also that within a sensitive context. However, it is our view that this requirement would benefit from further clarification and / or greater precision to better assist applicants in understanding the level of supporting information required for such applications. It is recommended, therefore, that the words ‘proportionate’ or ‘as appropriate’ be introduced to provide that greater definition and also ensure proportionality.
- 2.56 It may be, for example, that this part of the draft policy is misinterpreted to apply to all developments that would have any degree of visual effect (i.e. the great majority of applications), rather than more impactful developments. Also, it may be that the use of AVR may not be the only and / or best tool in all cases to robustly demonstrate the likely visual effects of a particular new development and context.
- 2.57 The **seventh paragraph** of this policy states that *“A proposal will only be acceptable where the applicant can demonstrate that it does not harm the views identified.”* It is our view that the wording of this part of the draft policy sets too high a threshold for the acceptability of new development that could affect, or potentially harm, identified local views. This is not consistent with the provisions of national policy or guidance as set out in the NPPF and NPPG, or the draft London Plan.
- 2.58 If we compare the wording of this paragraph to another within draft policy HE2 (albeit in relation to designated heritage assets and their settings), for example, we can see how a more balanced and proportionate approach has been taken elsewhere in the draft plan. Criterion b) of policy HE2 sets out that *“Great weight will be given to the asset’s conservation and consideration of harm will be weighed against all other material considerations; ...”* This suggests – in general accordance with paragraph 194 of the NPPF - that development within the setting of a designated heritage asset that would result in harm to significance would not necessarily be unacceptable in principle, rather that in seeking first to avoid, minimise and or then mitigate harm such development would require robust justification to secure planning permission.
- 2.59 Policy HC3 (Strategic and Local Views), and also Policy HC4 (LVMF), of the draft London Plan provides clear guidance on the identification and management of views as part of the development control process. It is established in the supporting wording to this policy that: *“The Mayor will seek to protect the composition and character of these views”* (para. 7.3.1), however it is not set out that if such a view is harmed by a proposed development that such an application would be refused in principle, and to the exclusion of all other material planning considerations.

2.60 Following this above example, and also established national and regional policy guidance on this and related matters, it is recommended that the wording of this final part of this draft policy be revised accordingly.

Appendix 1: Heritage Legislation, National and Regional / Local Policy and Guidance

Statutory Duties

The Planning (Listed Buildings and Conservation Areas) Act 1990

- 2.1 Section 1 (1) of the Act states that the Secretary of State shall compile lists of buildings of special architectural or historic interest. In compiling this list, they may take into account not only the building itself, but also:
- (a) any respect in which its exterior contributes to the architectural or historic interest of any group of buildings of which it forms part; and
 - (b) the desirability of preserving, on the ground of its architectural or historic interest, any feature of the building consisting of a man-made object or structure fixed to the building or forming part of the land and comprised within the curtilage of the building.
- 2.2 Once a building has been included on the statutory list, Section 7 (1) of the Act sets out that no person shall execute or cause to be executed any works for the demolition of a listed building or for its alteration or extension in any manner which would affect its character as a building of special architectural or historic interest, unless the works are authorised, by way of a listed building consent application.
- 2.3 Section 16(2) sets out the general duty with regard to the determination of listed building consent applications:
- “In considering whether to grant listed building consent for any works the local planning authority or the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.”*
- 2.4 Section 66 imposes a similar duty with respect to the exercise of planning functions. Subsection (1) provides:
- “In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.”*
- 2.5 With regard to applications for planning permission within conservation areas, the Act outlines in Section 72(1) that:
- “In the exercise, with respect to any buildings or other land in a conservation area, of any powers under any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.”*
- 2.6 Thus the statutory provision is satisfied if the development does one thing or the other, and there will be cases where proposals will both preserve and enhance a conservation area. The meaning of preservation in this context is taken to be the avoidance of harm. Character relates to physical characteristics but also to more general qualities such as

uses or activity within an area. Appearance relates to the visible physical qualities of the area. Importantly, however, the concept of the setting of a conservation area is not enshrined in legislation and does not therefore attract the weight of statutory protection.

- 2.7 Notably and importantly, recent case law¹ has confirmed that Parliament’s intention in enacting section 66(1) was that decision-makers should give “considerable importance and weight” to the desirability of preserving the setting of listed buildings, where “preserve” means to “to do no harm” (after South Lakeland). Case law has also confirmed that this weight can also be applied to the statutory tests in respect of conservation areas². These duties, and the appropriate weight to be afforded to them, must be at the forefront of the decision makers mind when considering any harm that may accrue and the balancing of such harm against public benefits as subsequently required by national planning policy. The Secretary of State has confirmed³ that “considerable importance and weight” is not synonymous with “overriding importance and weight”.

National Policy

National Planning Policy Framework (NPPF) 2019

- 2.8 The National Planning Policy Framework (NPPF) was introduced in March 2012 as the full statement of Government planning policies covering all aspects of the planning process. The revised National Planning Policy Framework was published in July 2018 and replaced the previous version published in 2012. Further updates were issued by the Government in February 2019, although not directly affecting policy in relation to heritage assets. One of the core planning principles of the NPPF is that planning should heritage assets:

“should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.”

- 2.9 The glossary of the NPPF (Annex 2) defines conservation as the process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance.
- 2.10 Chapter 16 of the NPPF outlines the Government’s guidance regarding conserving and enhancing the historic environment in more detail.
- 2.11 Paragraph 185 sets out that local authority plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This strategy should take into account:

a) the desirability of sustaining and enhancing the significance of heritage

¹ Barnwell Manor Wind Energy Limited and (1) East Northamptonshire District Council (2) English Heritage (3) National Trust (4) The Secretary of State for Communities and Local Governments, Case No: C1/2013/0843, 18th February 2014

² The Forge Field Society v Sevenoaks District Council [2014] EWHC 1895 (Admin); North Norfolk District Council v Secretary of State for Communities and Local Government [2014] EWHC 279 (Admin)

³APP/H1705/A/13/2205929

assets, and putting them to viable uses consistent with their conservation;

b) the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;

c) the desirability of new development making a positive contribution to local character and distinctiveness; and

d) opportunities to draw on the contribution made by the historic environment to the character of a place.

- 2.12 Paragraph 189 also requires the significance of the heritage assets, which may be affected by the proposals to be described as part of any submission, ideally as part of a Heritage Statement report. The level of detail should be proportionate to the importance of the assets and sufficient to understand the potential impact of the proposals on their significance. Paragraph 190 sets out that local planning authorities should also identify and assess the particular significance of heritage assets that may be affected by proposals. They should take this assessment into account when considering the impact of proposals in order to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposal.
- 2.13 Paragraph 191 also highlights that where there is evidence of deliberate neglect of, or damage to, a heritage asset, the deteriorated state of the heritage asset should not be taken into account in any decision.
- 2.14 Paragraph 192 states that local planning authorities should take account of the desirability of sustaining and enhancing the significance of all heritage assets and putting them into viable uses consistent with their conservation; the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and the desirability of new development making a positive contribution to local character and distinctiveness.
- 2.15 Paragraph 193 further outlines that local planning authorities should give great weight to the asset's conservation⁴ when considering the impact on a proposed development on the significance of a designated heritage asset⁵. The more important the heritage asset, the greater the weight should be.
- 2.16 Paragraph 194 specifies that any harm to, or loss of, significance of a designated heritage asset should require clear and convincing justification. Paragraph 195 outlines that local planning authorities should refuse consent where a proposal will lead to substantial harm or total loss of significance, unless it can be demonstrated that this is necessary to deliver substantial public benefits that outweigh such harm or loss, or a number of other tests can be satisfied. Paragraph 196 concerns proposals which will lead to less than substantial harm to the significance of a designated heritage asset. Here harm should be weighed against the public benefits, including securing the

⁴ Conservation defined as the process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance (NPPF Annex 2: Glossary)

⁵ Designated Heritage Asset defined as a World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area under the relevant legislation (NPPF Annex 2: Glossary)

optimum viable use.

- 2.17 Paragraph 197 adds that the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.
- 2.18 Paragraph 198 requires that local planning authorities should not permit the loss of the whole or part of a heritage asset without taking all reasonable steps to ensure the new development will proceed after the loss has occurred. Paragraph 199 also sets out that authorities should require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence publicly accessible.
- 2.19 Paragraph 200 states that proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance), should be treated favourably. It outlines that local planning authorities should also look for opportunities for new development within conservations areas and the setting of heritage assets to enhance or better reveal their significance.
- 2.20 Paragraph 201 recognises that not all elements of a conservation area will necessarily contribute to its significance. Loss of a building (or other element) which makes a positive contribution to the significance of such an area should be treated either as substantial harm under paragraph 195 or less than substantial harm under paragraph 196, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the area as a whole.
- 2.21 Lastly, paragraph 202 requires local planning authorities (in particular cases) to assess whether the benefits of a proposal for enabling development, which would otherwise conflict with planning policies but which would secure the future conservation of a heritage asset, outweigh the disbenefits of departing from those policies.

National Guidance

National Planning Practice Guidance (NPPG) 2014

- 2.22 National Planning Practice Guidance (NPPG) 2014 has been issued by the Government as a web resource and living document, including a category on conserving and enhancing the historic environment. This is intended to provide more detailed guidance and information with regard to the implementation of national policy set out in the NPPF.
- 2.23 The NPPG 2014 helps to define some of the key heritage terms used in the Framework. With regard to substantial harm, it is outlined that in general terms this is a high test, so it may not arise in many cases. For example, in determining whether works to a listed building constitute substantial harm, an important consideration would be whether the adverse impact seriously affects a key element of its special interest. Optimum viable use is defined in the NPPG as the viable use likely to cause the least harm to the significance of the heritage asset, not just through necessary initial

changes, but also as a result of subsequent wear and tear and likely future changes.

2.24 Public benefits are also defined in the NPPG 2014, as anything that delivers economic, social and environmental progress as described in the NPPF. Public benefits should flow from the proposed development, and they may include heritage benefits.

Heritage benefits are also defined in the NPPG as:

- *sustaining or enhancing the significance of a heritage asset and the contribution of its setting*
- *reducing or removing risks to a heritage asset*
- *securing the optimum viable use of a heritage asset in support of its long term conservation.*

Department of Culture, Media and Sport Circular: Principles of Selection for Listing Buildings 2018

2.25 The Principles of Selection for listing buildings sets out the general criteria for assessing the special interest of a building in paragraph 16, as below:

“Architectural Interest. To be of special architectural interest a building must be of importance in its architectural design, decoration or craftsmanship; special interest may also apply to nationally important examples of particular building types and techniques (e.g. buildings displaying technological innovation or virtuosity) and significant plan forms;

Historic Interest. To be of special historic interest a building must illustrate important aspects of the nation’s social, economic, cultural, or military history and/or have close historical associations with nationally important people. There should normally be some quality of interest in the physical fabric of the building itself to justify the statutory protection afforded by listing.”

2.26 When making a listing decision, paragraph 17 sets out that the Secretary of State may also take into account:

“Group value: The extent to which the exterior of the building contributes to the architectural or historic interest of any group of buildings of which it forms part, generally known as group value. The Secretary of State will take this into account particularly where buildings comprise an important architectural or historic unity or a fine example of planning (e.g. squares, terraces or model villages) or where there is a historical functional relationship between the buildings. Sometimes group value will be achieved through a co-location of diverse buildings of different types and dates.

Fixtures and features of a building and curtilage buildings: The desirability of preserving, on the grounds of its architectural or historic interest, any feature of the building consisting of a man-made object or structure fixed to the building or forming part of the land and comprised within the curtilage of the building.

The character or appearance of conservation areas: In accordance with the terms of section 72 of the 1990 Act, when making listing decisions in respect of a building in a conservation area, the Secretary of State will pay special attention to the desirability of preserving or enhancing the character or appearance of that area.”

- 2.27 General principles for selection are also set out in this advice, in paragraphs 18-23. These include: Age and rarity; Buildings less than 30 years old; Aesthetic merits; Selectivity; and National interest, although State of repair will not usually be a relevant consideration.
- 2.28 In addition to the criteria and general principles set out in the guidance, a number of Selection Guides for different building types have been published by Historic England, first in 2011 and then later updated. These Selection Guides provide further information regarding each building type, and demonstrate what features are considered significant and likely to make a building of special architectural or historic interest when assessing each building type.

National Advice

Historic England: Historic Environment Good Practice Advice in Planning Note 1: The Historic Environment in Local Plans 2015

- 2.29 GPA Note 1 provides information to assist; principally local planning authorities, in implementing historic environment policy in the National Planning Policy Framework (NPPF) and the related guidance given in the National Planning Practice Guidance (NPPG). It emphasises that all information requirements and assessment work in support of plan-making and heritage protection needs to be proportionate to the significance of the heritage assets affected and the impact on the significance of those heritage assets. At the same time, those taking decisions need sufficient information to understand the issues and formulate balanced policies.

Historic England: Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision Taking in the Historic Environment 2015

- 2.30 GPA Note 2 provides information to assist in implementing historic environment policy in the National Planning Policy Framework (NPPF) and the related guidance given in the National Planning Practice Guidance (NPPG). These include; assessing the significance of heritage assets, using appropriate expertise, historic environment records, recording and furthering understanding, neglect and unauthorised works, and marketing. It provides a suggested staged approach to decision-making where there may be a potential impact on the historic environment:

- 1. Understand the significance of the affected assets;*
- 2. Understand the impact of the proposal on that significance;*
- 3. Avoid, minimise and mitigate impact in a way that meets the objectives of the Framework;*
- 4. Look for opportunities to better reveal or enhance significance;*

5. Justify any harmful impacts in terms of the sustainable development objective of conserving significance and the need for change;

6. Offset negative impacts on aspects of significance by enhancing others through recording, disseminating and archiving archaeological and historical interest of the important elements of the heritage assets affected.

2.31 With particular regard to design and local distinctiveness, advice sets out that both the NPPF (section 7) and NPPG (section ID26) contain detail on why good design is important and how it can be achieved. In terms of the historic environment, some or all of the following factors may influence what will make the scale, height, massing, alignment, materials and proposed use of new development successful in its context:

- *The history of the place*
- *The relationship of the proposal to its specific site*
- *The significance of nearby assets and the contribution of their setting, recognising that this is a dynamic concept*
- *The general character and distinctiveness of the area in its widest sense, including the general character of local buildings, spaces, public realm and the landscape, the grain of the surroundings, which includes, for example the street pattern and plot size*
- *The size and density of the proposal related to that of the existing and neighbouring uses*
- *Landmarks and other built or landscape features which are key to a sense of place*
- *The diversity or uniformity in style, construction, materials, colour, detailing, decoration and period of existing buildings and spaces*
- *The topography*
- *Views into, through and from the site and its surroundings*
- *Landscape design*
- *The current and historic uses in the area and the urban grain*
- *The quality of the materials*

Historic England: Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets 2017 (2nd Edition)

2.32 The second edition of the GPA Note 3 provides information to assist in implementing historic environment policy with regard to the managing change within the setting of heritage assets, and also relevant views analysis. This also provides a toolkit for assessing the implications of development proposals affecting setting and views. A

series of stages are recommended for assessment, these are:

Step 1: identifying the heritage assets affected and their settings

Step 2: assessing whether, how and to what degree these settings make a contribution to the significance of the heritage asset(s)

Step 3: assessing the effect of the proposed development

Step 4: maximising enhancement and minimising harm

Step 5: making and documenting the decision and monitoring outcomes.

- 2.33 Guidance sets out that the contribution of setting to the significance of a heritage asset is often expressed by reference to views. However, assessing how development can affect heritage significance is not purely a visual consideration, but should also consider other aspects such as any impact on historical relationships between assets and within the townscape or landscape context, patterns of use or access, noise through activity etc.

Historic England: Advice Notes

- 2.34 Further advice notes have been published by Historic England, which include detailed practical advice on how to implement national planning policy and guidance. These include:

Historic England: Advice Note 1: Conservation Area Designation, Appraisal and Management 2019 (2nd Edition)

Historic England: Advice Note 2: Making Changes to Heritage Assets 2016

Historic England Advice Note 3: The Historic Environment and Site Allocations in Local Plans 2015

Historic England Advice Note 4: Tall Buildings 2015

Historic England Advice Note 5: Setting up a Listed Building Heritage Partnership Agreement 2015

Historic England Advice Note 6: Drawing up a Local Listed Building Consent Order 2015

Historic England Advice Note 7: Local Heritage Listing 2016

Historic England Advice Note 8: Sustainability Appraisal and Strategic Environmental Assessment 2017

Historic England Advice Note 9: The Adaptive Reuse of Traditional Farm Buildings 2017

Historic England Advice Note 10: Listed Buildings and Curtilage 2018

Development Plan

- 2.35 There is no statutory requirement to have regard to the provisions of the development plan (regional and local policy) in the consideration of applications for listed building consent. As such, less weight should be given to the policies set out in the plan compared to the statutory duties of the Act. This is not the case for the determination of applications for planning permission that may affect the significance (or setting) of heritage assets.
- 2.36 The objectives of national policy and the development plan, with regard to the protection of heritage assets, should be closely aligned. Local authorities should also ensure that aspects of heritage conservation policy that are relevant to development control decisions are included in the local development plan.

GLA London Plan 2016 & draft London Plan 2018

- 2.37 The current London Plan was adopted by the Greater London Authority in July 2011 and sets out the Spatial Development Strategy for all Boroughs within Greater London. It replaces the London Plan (consolidated with alterations since 2004), which was published in February 2008. The Plan has been subsequently revised to ensure consistency with the Framework and other changes since 2011.
- 2.38 The plan has been amended through the publication of Revised Early Minor Alterations (October 2013) and Further Alterations to the London Plan (FALP) (January 2014 and March 2015). In May 2015 two sets of Minor Alterations to the London Plan (MALPs) – Housing Standards and Parking Standards – were published for public consultation. These were prepared to bring the London Plan in line with new national housing standards and the Government’s approach to car parking policy. An Examination in Public considered the MALPs in October 2015, and they were formally published as alterations to the London Plan in March 2016.
- 2.39 Policy 7.8 (Heritage assets and archaeology) states that:

“Strategic

A. London’s heritage assets and historic environment, including listed buildings, registered historic parks and gardens and other natural and historic landscapes, conservation areas, World Heritage Sites, registered battlefields, scheduled monuments, archaeological remains and memorials should be identified, so that the desirability of sustaining and enhancing their significance and of utilising their positive role in place shaping can be taken into account.

B. Development should incorporate measures that identify, record, interpret, protect and, where appropriate, present the site’s archaeology.

Planning decisions

C. Development should identify, value, conserve, restore, re-use and incorporate heritage assets, where appropriate.

D. Development affecting heritage assets and their settings should conserve

their significance, by being sympathetic to their form, scale, materials and architectural detail.

E. New development should make provision for the protection of archaeological resources, landscapes and significant memorials. The physical assets should, where possible, be made available to the public on-site. Where the archaeological asset or memorial cannot be preserved or managed on-site, provision must be made for the investigation, understanding, recording, dissemination and archiving of that asset ...”

2.40 A new London Plan has been issued in draft by the Mayor / GLA for public consultation. The first stage was between 1st December 2017 and 2nd March 2018; and now ongoing during 2019 to further examine specific themes and topics. This emerging planning policy is in its first stage, but clearly indicates the direction of travel for planning development within the London region, and therefore should be afforded weight.

2.41 Chapter 7 of the draft new London Plan 2017 relates to heritage and culture. Draft Policy HC1 (Heritage conservation and growth) sets out that:

A Boroughs should, in consultation with Historic England and other relevant statutory organisations, develop evidence that demonstrates a clear understanding of London’s historic environment. This evidence should be used for identifying, understanding, conserving, and enhancing the historic environment and heritage assets, and improving access to the heritage assets, landscapes and archaeology within their area.

B Development Plans and strategies should demonstrate a clear understanding of the historic environment and the heritage values of sites or areas and their relationship with their surroundings. This knowledge should be used to inform the effective integration of London’s heritage in regenerative change by:

1) setting out a clear vision that recognises and embeds the role of heritage in place-making

2) utilising the heritage significance of a site or area in the planning and design process

3) integrating the conservation and enhancement of heritage assets and their settings with innovative and creative contextual architectural responses that contribute to their significance and sense of place

4) delivering positive benefits that sustain and enhance the historic environment, as well as contributing to the economic viability, accessibility and environmental quality of a place, and to social wellbeing.

C Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets’ significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings,

should also be actively managed. Development proposals should seek to avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.

D Development proposals should identify assets of archaeological significance and use this information to avoid harm or minimise it through design and appropriate mitigation. Where applicable, development should make provision for the protection of significant archaeological assets and landscapes. The protection of undesignated heritage assets of archaeological interest equivalent to a scheduled monument should be given equivalent weight to designated heritage assets.

E Where heritage assets have been identified as being At Risk, boroughs should identify specific opportunities for them to contribute to regeneration and place-making, and they should set out strategies for their repair and re-use.”

2.42 Policy HC3 (Strategic and Local Views) sets out that:

“A Strategic Views include significant buildings or urban landscapes that help to define London at a strategic level. They are seen from places that are publicly-accessible and well-used. The Mayor has designated a list of Strategic Views (Table 7.1) that he will keep under review. Development proposals must be assessed for their impact on a designated view if they fall within the foreground, middle ground or background of that view.

B Within the designated views, the Mayor will identify landmarks that make aesthetic, historic, cultural or other contributions to the view and which assist the viewer’s understanding and enjoyment of the view.

C The Mayor will also identify Strategically-Important Landmarks in the views that make a very significant contribution to the image of London at the strategic level or provide a significant cultural orientation point. He will seek to protect vistas towards Strategically-Important Landmarks by designating landmark viewing corridors and wider setting consultation areas. These elements together form a Protected Vista. Each element of the vista will require a level of management appropriate to its potential impact on the viewer’s ability to recognise and appreciate the Strategically-Important Landmark. These and other views are also subject to wider assessment beyond the Protected Vista.

D The Mayor will also identify and protect aspects of views that contribute to a viewer’s ability to recognise and appreciate a World Heritage Site’s authenticity, integrity, and attributes of Outstanding Universal Value. This includes the identification of Protected Silhouettes of key features in a World Heritage Site.

E The Mayor has prepared Supplementary Planning Guidance on the management of the designated views – the London View Management Framework Supplementary Planning Guidance (LVMF SPG). The Mayor will, when necessary, review this guidance.

F Boroughs should include all designated views, including the protected vistas, in their Local Plans and work with relevant land owners to ensure there is inclusive public access to the viewing location, and that the view foreground, middle ground and background are effectively managed in accordance with the LVMF SPG.

G Boroughs should clearly identify important local views in their Local Plans and strategies. Boroughs are advised to use the principles of Policy HC4 London View Management Framework for the designation and management of local views. Where a local view crosses borough boundaries, the relevant boroughs should work collaboratively to designate and manage the view.”

- 2.43 Draft Policy HC4 relates more specifically to the London View Management Framework.

Enfield Council draft new Local Plan 2020-2036

- 2.44 The London Borough of Enfield are now consulting on a new Local Plan 2020-2036, which is intended to help shape how Enfield is developed in the future. The latest public consultation stage revisits the issues and options stage carried out earlier in 2015.

- 2.45 Chapter 2 (Promoting good growth options in Enfield) of the draft Local Plan firstly looks at creating a vision for Enfield and its broader growth objectives. As part of consultation discussions the draft Local Plan looks to consider the issue of:

“Managing significant change whilst protecting and enhancing the borough’s heritage and natural environment.”

- 2.46 Accordingly, one of the key challenges facing Enfield in delivering development is identified as:

“Preserve statutorily recognised character areas and heritage and historic assets; ...”

- 2.47 As part of draft Objective 1 (Promoting and managing growth one aim is to:

“Respect and enhance the character of the borough’s cultural, built heritage and neighbourhoods; ...”

- 2.48 Objective 3 (Enhancing Enfield’s assets) also includes the aim:

“To enhance the unique historic environment of Enfield and the character, distinctiveness of the borough’s conservation areas and other historic and valued buildings, cultural, spaces and places; ...”

- 2.49 Chapter 3 (Enhancing heritage) relates to development affecting heritage assets and the wider historic environment; setting out a number of recommended draft policy approaches.

- 2.50 HE1 (draft policy approach: Design quality and local character) sets out that:

“The Council will ensure that heritage anchors new development, defines and connects communities as part of the transformative change and growth agenda.

The Council will ensure that projected growth in the forthcoming plan period helps to conserve and enhance the quality and character of Enfield’s historic environment and heritage assets and their settings, in line with relevant national and London Plan policy, legislation and best practice guidance.

The Council recognises Enfield’s heritage as equally stemming from and represented by assets located in all three original boroughs (Enfield, Edmonton and Southgate) and diverse character areas (including inter-war suburban areas that developed around the Underground railway / Piccadilly line, traditional market town areas, historical urban areas and suburbs, and planned settlements).

All heritage assets and aspects from all parts of the borough are recognised as important, worth protecting and enhancing and as an opportunity to inform and contribute toward well-designed places.

We will expect development proposals to:

Make a positive contribution to the borough’s regeneration, character and future architectural heritage; and

Demonstrate a clear understanding of the borough’s unique heritage and how proposals will conserve and enhance that character, using available published and archival resources including the GLHER.

The Council is particularly committed to working with residents in parts of the borough where heritage may be scarce or under represented, to reduce inequality across the borough and build settled communities.”

2.51 HE2 (draft policy approach: Designated heritage assets, their setting and archaeology) sets out that:

“The Council will aim to conserve and enhance the character and appearance of the borough’s heritage assets in accordance with the following:

a) Development affecting heritage assets will only be supported with relevant evidence and undertaken in a manner appropriate to the asset’s significance;

b) Great weight will be given to the asset’s conservation and consideration of harm will be weighed against all other material considerations;

c) Proposals should be sympathetic to and respond to the setting of local heritage assets.

Proposals that would significantly harm the setting of a local heritage asset

will be refused.

In the case of proposals affecting a designated heritage asset, its setting or a property within a conservation area, applicants must provide a Heritage Statement to demonstrate:

The significance of heritage assets affected by proposals;

The contribution made by their setting;

The extent of the impact of the proposal on the significance of any heritage assets affected; and

Any supporting information required to assess the impact of proposals.

Intelligent design will be required to ensure that any planned changes conserve and enhance the heritage value of an asset and its setting rather than diminishing this.

When considering the impact of proposals, there should be regard to cumulative effects of minor changes on heritage assets.

Heritage assets at risk will be identified through the Historic England heritage at risk register. Appropriate measures to remove the asset from the at-risk register will be identified through an action plan. Proposals need to have regard to relevant actions as identified.

Where a proposal affects archaeological remains, developers should mitigate harm as appropriate in relation to the significance of the remains and record evidence to be deposited with the Greater London Historic Environment Record and the local archive.”

2.52 HE3 (draft policy approach: Locally listed and undesignated heritage assets and cultural practices) sets out that:

“The Council recognises that locally listed and other undesignated heritage assets, as well as certain uses associated with some buildings, can make important contributions to the borough’s heritage and are therefore in need of recognition and protection.

Proposals for change will be decided by taking a balanced judgement, having regard to the significance of the heritage asset and the scale of any harm or loss.

We will expect development proposals to:

Enhance and protect local heritage and cultural assets and cultural practices; and

Aim to increase public access to and understanding of designated and undesignated heritage assets.

Where the significance of the local heritage asset is linked to its use or original purpose, the development should take this into consideration.”

2.53 HE4 (draft policy approach: views) sets out that:

“The Council will ensure the protection of strategic and local views, especially at important gateways and along key routes.

All proposals, including those for tall buildings, will be assessed regarding their impact on views, these include:

Within the boundary or in the immediate vicinity of, or along views to, or from designated heritage assets including conservation areas; statutorily or locally listed buildings; scheduled or locally listed ancient monuments; and statutorily or locally registered historic parks and gardens;

In other locations where development would infringe upon or detract from important strategic or local views; and

On ridges or other areas of high ground where they would have a significant impact on the horizon.

As part of this assessment, the Council will require applicants to submit accurate visual representations of the proposal as seen from the surrounding area, including from agreed points within important local views.

A proposal will only be acceptable where the applicant can demonstrate that it does not harm the views identified.”

2.54 Enfield are also consulting on a new **Heritage Strategy 'Making Enfield'**, which is proposed to be adopted in due course as a Supplementary Planning Document (SPD) to the Local Plan. It is set out that:

“This strategy embraces the growth agenda and celebrates Enfield’s heritage in realising its ambitions and securing quality places.”

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Local Plan for Enfield 2018 – 2036
Planning Policy
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By email only: localplan@enfield.gov.uk

Dear Sir/Madam,

REPRESENTATION TO ENFIELD DRAFT LOCAL PLAN 2036 - ISSUES AND OPTIONS CONSULTATION

I write on behalf of our client, L&Q, in response to the Issues and Options consultation on the 'Draft New Local Plan 2036'. L&Q thank you for the opportunity to comment on the draft Local Plan and would express their general support to the positive approach that the plan takes.

L&Q is a regulated charitable housing association and one of the UK's most successful independent social businesses. The L&Q Group houses around 250,000 people in more than 95,000 homes, primarily across London and the South East. L&Q's vision is that everyone has a quality home they can afford and combine its social purpose with commercial drive to create homes and neighbourhoods everyone can be proud of. L&Q's core tenure is social rented housing. On average, residents living in these homes pay less than 50% of market rents, making them genuinely affordable for people on lower incomes. The Group are committed to preserving this housing and building more of it. There is a strong focus on the needs of existing social housing residents by investing in their homes, local communities and services as well as L&Q creating high quality homes for private rent, shared ownership and outright sale reinvesting profits in to the company's core products.

In response to the housing and affordability crisis, L&Q propose to build 100,000 new homes over ten years. Of these, 60,000 homes will be built or funded by L&Q, whilst a further 40,000 will come through partnerships. Crucially, at least 50% of these new homes will be genuinely affordable, with a target of 60% in London.

L&Q holds a portfolio of over 2,500 properties in the London Borough of Enfield and is continuing to seek opportunities for contributing to the significant housing need of the borough.

As set out in at the outset of these representations, L&Q supports to the positive approach that the draft Local Plan takes and considers that the draft vision and growth objectives set out in Chapter 2, which form the fundamentals of the plan, are well founded. The following comments focus on some of the policies which underpin the draft Local Plan.

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Chapter 3 highlights the importance of heritage conservation and enhancement within the borough. The Council has recognised the values of community and the contribution to place that heritage can bring, particularly in consideration of its history of industrial uses. As a key principle of the draft plan, this approach is supported. It is considered that the principles of the draft policies outlined in chapter 3 are compliant with the policies set out in the emerging replace London Plan and the National Planning Policy Framework (2019). Embracing the boroughs industrial heritage is the strategic vision of 'Making Enfield', which is considered to enable the next chapter of Enfield's development.

The Council's approach to design set out in chapter 4 of the draft Local Plan is supported. It is recognised that the Council places a fundamental priority on the delivery of high quality, well-designed placed across the Borough. Reference is made to the use of higher densities to accommodate growth, which is necessary to achieve the optimistic growth targets for the borough. This is also in line with objectives set out in the emerging London Plan (2017) in particular, the Lee Valley Opportunity Area in Enfield identifies that a range of development opportunities exist for higher density development.

The Council identifies its housing target in accordance with the emerging London Plan. The need for a step change in housing delivery fundamental to the success of the planning system and L&Q is pleased to see that emphasis has been placed on increasing housing availability, affordability and quality throughout the draft Local Plan. The Council's recognition that achieving availability, affordability and quality will be a key priority challenge are noted and the approach contained in draft policies H1-H8 are supported.

Given that L&Q's primary focus is the delivery of affordable homes for people, draft policy H2: Affordable Housing is of particular interest. The strategic target of achieving 50% affordable housing reflects that of the Mayor and is supported in principle. The Mayor's threshold approach is reflected the proposed minimum 30% on site trigger. The issues and options report suggests that that the Council might wish to increase this minimum provision to above 50%, beyond the targets set out in the draft new London Plan, if supported by a new Local Housing Need Assessment and Local Plan Viability exercise. L&Q wishes to reserve its views on such an approach until this evidence is available. Whilst the approach of increasing minimum thresholds would on the face of it align with both the Council's and L&Q's corporate priorities, such an approach may reduce housing delivery overall and therefore reduce the quantum of housing provided.

It is noted that the Council identify the opportunities that can be realised through affordable rent and as such, suggest that the overall mix of affordable tenure should include for a proportion (at least 30%) of affordable rent separate to other traditional intermediate products such as the London living rent and shared ownership (also at 30%). At this time, the remaining 40% is to be determined by the Council at such time as it prepares the Housing Strategy for Enfield. L&Q will provide further comment on the overall approach to affordable housing as such time that all the necessary evidence is available.

L&Q looks forward to continuing to engage with the Council during the Local Plan process.

Yours faithfully,

Jonathan Bainbridge
Associate

Sent Via Email: localplan@enfield.gov.uk

Strategic Planning and Design
Enfield Council
FREEPOST
NW5036
EN1 3BR

Date: 28 February 2019
Our ref: MS/7146362v1
Your ref:

Dear Sir or Madam

Enfield - Towards a New Local Plan 2036, Issues and Options

Lichfields is instructed by parties with landowner interests in sites at Crews Hill and has been asked to prepare representations to the Enfield Local Plan Issues and Options consultation. Our clients strongly support the identification of the existing settlement around Crews Hill station as having the greatest potential to act as a hub for sustainable growth in the District. We set out our representations as follows.

The Need for Housing and Green Belt Release

The need for housing in London and Enfield Borough is acute and will necessitate Enfield Council implementing a varied spatial strategy in order to bring sufficient land forward to meet needs, including releasing Green Belt. Focusing growth solely in the urban areas, whilst a very important component of any strategy, is unlikely to be sufficient on its own given constraints and existing uses of land.

The existing housing target for Enfield in the Further Alterations to London Plan (FALP) is 798 dwellings per annum (dpa). However, this falls well short of the housing needs of the Borough. Such housing needs are estimated in the Enfield SHMA (2015) to be up to 2,400dpa, whilst Government's standard method for assessing Local Housing Needs indicates a need for 3,330dpa within the Borough. The new draft London Plan (December 2017) is currently under Examination and proposes a **target of 1,876dpa** for Enfield, including 983dpa from small sites. Over an 18-year Enfield Local Plan period to 2036 this would necessitate that Enfield provides for **c.33,800 new homes**. Even then, such a scale of delivery would not meet full housing needs in the Borough, because the London Plan fails to meet housing needs across the capital with its proposed London-wide target of c.65,000dpa; there is a clear rationale for Enfield Borough seeking to significantly boost its housing delivery to meet and exceed the emerging target. This will necessitate a step-change in delivery and is recognised in the Issues and Options document as one of the key reasons why a new Enfield Local Plan is required (section 1.7, page 14).

Set against this, the capacity for Enfield's existing urban (non-Green Belt) area to accommodate such significant housing growth is limited. To be included in the Local Plan, sites, broad locations and sources of supply should be either deliverable (suitable and available now) or developable (in a suitable location with a reasonable prospect it will be available at the point envisaged) with the strategic policies of the plan providing a clear strategy for bringing sufficient land forward to meet housing needs (NPPF para 23). We

note that Enfield Council has suggested in its evidence to the London Plan examination that current estimated supply within the housing trajectory for the Borough is 15,650 dwellings 2018/19 to 2032/33 (equivalent to 1,043dpa). Applied as a notional figure over an 18-year plan period would **suggest urban capacity in the area is c.18,800 dwellings**, meaning the new Local Plan will need to find new and genuinely additional supply for approximately 15,000 new homes.

Furthermore, the small sites target of 983dpa in the draft London Plan for Enfield Borough does not appear deliverable. Over the past five years Enfield has only delivered 720 homes (144 per annum) on small sites over the past five years, whilst over a longer 14-year period this source of supply has averaged 250dpa. Even significant increases on this past trend would fail to meet the small sites target.

This significant unmet housing need (c.15,000), and constraints on small site delivery, will need Enfield Council to plan differently, including looking to review Green Belt as consistent with meeting identified requirements for development (NPPF para 139).

A Strategic Plan-Led Approach to Green Belt

The approach of taking a strategic plan-led approach to Green Belt (Section 2.12, page 50) is strongly supported.

The NPPF at paragraph 136 sets out that Green Belt boundaries can be altered through plans where there are exceptional circumstances. Such exceptional circumstances include meeting identified need for development (NPPF para 137). Whilst the new draft London Plan (2017) indicates that de-designation of Green Belt will not be supported, Green Belt boundaries are set by Local Plans and it will still be necessary for the new Enfield Local Plan to conform with the NPPF and tests of soundness, including to meet development needs.

Similar approaches to Green Belt review in outer London Boroughs have been found to be necessary and sound in other recent Local Plan examinations. For example, in Redbridge, in finding the plan sound, the Inspector stated (January 2018):

“The capacity for new housing from ‘brownfield’ sources over the plan period is 15,937. This is significantly below The London Plan target which is enshrined in Policy LP2 as the housing requirement. As a result the Council has undertaken a review of potential Green Belt sites... without Green Belt sites the relevant housing requirement would not be met contrary to the aims of the NPPF and... there would not be general conformity with The London Plan. As explained above the yield envisaged from within the built-up area is realistic and there is no suggestion that obvious candidates for development have been omitted. Furthermore, the estimates of capacity have sought to maximise densities as far as possible.”

The position in Enfield is comparable and confirms that such a strategic plan-led approach to Green Belt is appropriate.

It is important that the Council also considers the need to ensure Green Belt boundaries endure beyond the plan period (NPPF para 136). This means that the Council would need to be satisfied now that longer-term development needs could be addressed (including those beyond the end of the plan period to 2036) without further alteration of Green Belt boundaries being necessary at the end of the plan period. In practical terms the NPPF sets out (para 139 c) this should be done by identifying areas of safeguarded land between the urban area and the Green Belt in order to meet longer-term development needs stretching well beyond the plan period. It will not be sufficient to just ensure the current housing target is met through any Green Belt alterations, but the plan must respond to those ongoing and longer-term growth needs. In that context, a strategic plan-led approach to Green Belt is both prudent and necessary.

Crews Hill as a Broad Location for Growth

As set out above, the strategic-plan led approach to Green Belt set out within the consultation document is considered an appropriate option for meeting the housing and growth needs of the Borough and is supported. In particular, the reference to Crews Hill (para 2.12.2) as an example of a Green Belt area with potential to deliver good growth with strong sustainability credentials is strongly supported.

The existing built-up area around Crews Hill, although largely washed-over by the Green Belt, is in large part defined as previously developed land (brownfield) and is closely located to Crews Hill railway station which has significant capacity. These are the two characteristics identified within NPPF paragraph 138 as being land which should be given first consideration when plans seek to release Green Belt (brownfield land in the Green Belt and well-served by public transport). They also dovetail with two of the options the Council is looking towards through the consultation for how the new Local Plan might deliver growth differently; the first principle of exhausting reasonable opportunities on brownfield land (para 2.4.1) and the option of looking to areas around stations (section 2.8, page 39). The areas both east and west of the railway line at Crews Hill are in close proximity to the train station and have the potential to deliver sustainable development, at a critical mass and supported by delivery of new community infrastructure, which maximises opportunity for sustainable modes of travel.

More generally, the role of Crews Hill as a specialist horticultural location has been declining, with other retail and business uses gradually replacing the glasshouses and nursery type operations. This was recognised in the 2011 Enfield Characterisation Study which states (page 152) *“Crews Hill represents an increasing problem for the green belt, and is gradually mutating from greenhouse and nursery use to general business and retail. This has a significant effect on the character of the area...”*. The area is now less associated with its historical role as a location for the growing and wholesale of plants, and is now characterised by an increasingly disparate and diversified mixture of garden and household-related retail, pet stores, cafes, shopping miscellany, storage/distribution type uses and general light industrial activities.

The effect of this is an area of Green Belt characterised by development, buildings and uses which provide very little sense of countryside or openness. The areas existing built form is visually intrusive¹ and the areas contribution to Green Belt purposes has been significantly reduced. It is an area where rationalisation of existing uses and redevelopment of underutilised land, could make a substantive contribution to the housing and development needs of the Borough. Retaining/re-providing for the elements of Crews Hill which genuinely provide a strong horticultural function means the role of these uses would not necessarily need to be lost to the Borough, whilst more general retail and leisure functions could be consolidated into a new community or other town centres.

The identification of Crews Hill as a broad location for growth in the Enfield Local Plan would be welcomed. As the issues and options consultation document recognises (para 9.3.8) it could provide a highly accessible hub for growth supported by a wide range of new infrastructure provision to make the area self-sustaining.

We trust our comments are helpful as Enfield Council progresses its local plan.

Yours faithfully

Matthew Spry
Senior Director

¹ Enfield Characterisation Study (2011) Page 172

Via Email: localplan@enfield.gov.uk

Strategic Planning and Design
Enfield Council
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Date: 28 February 2019

Our ref: 16500/01/NT/CCK/17168817v5

Your ref:

Dear Sir/Madam

Enfield Local Plan 2036 – Issues and Options (Regulation 18) Consultation

On behalf of our client, The Wave (London), we set out below representations to the Enfield Local Plan 2036 Issues and Options consultation, issued for comment until 28 February 2019 ('the consultation document').

The Wave is an inland surf destination that allows people to surf on consistent safe waves all year round, providing naturally healthy spaces where people of all ages, abilities and backgrounds, can improve their health and wellbeing. Currently in construction on a Green Belt site in Bristol (due to open in Autumn 2019), The Wave is now working with the Lee Valley Regional Park Authority to develop a proposal for a world-class surfing destination at the Lee Valley Leisure Complex in Edmonton, North London, reinvigorating and enhancing circa 100 acres of land within the Regional Park. The Wave London could offer a new purpose-built surfing lake and feature other elements such as a high-performance surfing and skateboarding centre, health and rehabilitation, cycle trails, high ropes, and overnight accommodation. There would also be opportunities to work with local schools and groups to offer therapeutic and educational programmes, and in addition provide access to the lake for marginalised groups in the borough.

Our review of the consultation document therefore focuses on the planning policy issues relevant to support the delivery of this exciting development for the London Borough of Enfield.

1. Growth Objectives

The inclusion of the Council's growth objectives within the consultation document is supported, setting out a series of objectives for the new Local Plan to achieve its vision. The Wave, however, considers that the visitor economy and wider tourism sector should be fully recognised within Objective 1 (Promoting and managing growth). Tourism/leisure is a significant contributor to the future growth of Enfield's economy (as well as the wider London region). This would lend further support to the recognised need in the consultation document for Enfield to increase leisure and social activities (para 1.11-challenges facing Enfield).

The Lee Valley Regional Park is already an important and established part of London's leisure and tourism provision. The Wave will help raise its profile and reinforce this role.

Such an approach would reflect national policy as set out in the National Planning Policy Framework (NPPF, 2019) (Section 6, Paragraph 83) which supports the sustainable growth of the leisure and tourism industry.

The London Plan (2016) and Draft New London Plan (2018) encourages Boroughs to support and stimulate growth in the visitor economy and the seeks to promote tourism across the whole of the city, including outside central London. We therefore consider it crucial that the Local Plan recognises the importance of this sector to the economy and provides the necessary policy support.

2. Opportunity Areas

The Wave supports the inclusion of the Upper Lee Valley as an Opportunity Area. The Lee Valley represents one of London's major growth corridors (as designated in the London Plan). However, the relevant text (Para. 2.14.2- 2.14.3) does not confirm the overall importance of the Opportunity Area. The consultation document should acknowledge the significant contribution made by the existing sport, leisure and recreation attractions within the Upper Lee Valley Opportunity area (specifically at Picketts Lock), noting the significance of the leisure and tourism industry to the economy and the need to support its growth in order to maintain and enhance the Borough's economic profile.

This would align with the GLA's Upper Lee Valley Opportunity Area Planning Framework (July 2013) which refers to improvements to leisure and sports at Picketts Lock as one of the Upper Lee Valley objectives (Fig 1.3). The consultation document should therefore provide greater emphasis on this purpose of the Opportunity Area, reflecting what is included in the London Plan (2016), Draft New London Plan (2018) and the GLA's adopted planning framework.

3. Approach to Employment Land

The map within this section (Fig 6.4) identifies how the future of Enfield's industrial areas will be managed. This includes potential areas for substitution and consolidation. We consider that further clarification is required in the Local Plan on where these 'substitution and consultation' areas will be located.

Fig 6.4 currently identifies these as a double-headed arrow across an unidentifiable extent of land on a borough-wide map, which is rather ambiguous and difficult to determine. We assume that this does not include the Picketts Lock area (given it is a proposed leisure and recreation destination) however, a detailed plan which clearly demonstrates the 'substitution and consultation' areas would be welcomed to provide the necessary clarification.

4. Draft Policy SI3 (Arts and Cultural Facilities)

Policy SI3 positively supports the enhancement of entertainment, leisure and sport uses. The Council's leisure/tourism offer is included within this policy. However, it is considered that the current policy title does not accurately reflect the overall policy focus. Given the absence of a specific visitor/tourism policy, we consider that the policy title should be amended to reflect this particular focus. In addition, a more flexible approach is required to both sufficiently address and distinguish between both new and existing uses. Our suggested revisions to the policy are set out below (our additions are in **bold** text):

*Draft Policy SI3 (Arts, Cultural, **Leisure and Tourism** Facilities)*

*The Council will support the enhancement of arts, cultural, entertainment, leisure, **tourism**, recreation and sport uses. We will achieve this by:*

*a) Supporting the continued presence of Enfield's arts, culture, entertainment, leisure, recreation and sports venues (**both new and existing**) subject to the local impact of venues being managed without **unacceptable** impact to local residents **by:***

*i) Requiring proposals for new and expanded venues to be accessible and inclusive and to be supported by evidence of how impacts such as noise, traffic, parking and opening hours have been assessed, minimised and mitigated (**where possible**); or*

ii) Seeking retention, replacement or enhancement of existing arts, cultural, entertainment, leisure, recreation and sport uses, unless there is evidence that there is no longer an identified need for a particular facility or alternative arts, cultural, entertainment, leisure, recreation and sport uses. In these circumstances, the Council will require evidence demonstrating that the facility is not economically viable, including evidence of active and appropriate marketing for a continuous period of at least 12 months; and

b) Supporting the temporary use of vacant buildings for community use including for performance and creative work.

5. Draft Policy GI1 (Green and Blue Spaces)

Draft Policy GI1 sets out how the Council will protect, enhance the quality and improve access to open space. In respect of part (c) it is important to correctly consider the purpose of open space. Its specific use may change (for example, from a golf course to an inland surfing lake), but it would remain as open space nonetheless. We have therefore set out our suggested policy amendments below, which would also provide consistency with part (f) of the policy, which supports new high quality outdoor leisure facilities to promote sports and active recreation across the Borough.

c) Protecting all Open Space and Play Space in the borough as identified on the Policies Map. Any development proposals on such space should:

- ***Maintain the purpose of land being identified as open space, even if the specific use of that open space is altered;***
- ***Be supportive of development that is reasonably required to support the function/uses of and within that open space and ancillary to the purpose of that open space (whether in its existing or proposed use); and***
- *Enhance the quality or accessibility of the open space.*

6. Draft Policy GI2 (Green Belt and Metropolitan Open Land)

Policy GI2 sets out the Council's approach to protecting the openness of the Green Belt. We suggest that the policy is revised to read as follows:

*“Supporting development, which **maintains or** improves access to Green Belt areas for beneficial uses such as outdoor sport and recreation, where there is no conflict with protecting the openness of such land **or where very special circumstances are demonstrated**”.*

This ensures consistency with the NPPF as national policy (para. 141) advises that local planning authorities should look for opportunities to positively enhance their beneficial use; such as improving access to the Green Belt. As such, access improvement is not a mandatory requirement. Indeed, a site may already have open access and therefore a development proposal could not further improve on this, but could maintain it.

Policy GI2 also stipulates that a Green Belt boundary review will be undertaken. We would welcome clarification on the timescales for this and whether this review will be published for comment in advance of, and indeed inform, the next draft of the Local Plan.

Major Developed Sites

The supporting text to Policy GI2 has regard to the range of uses undertaken within the Green Belt, referencing Lee Valley Regional Park (LVRP), with its associated waterways and leisure activities. Paragraph 9.3.6 refers to two major developed sites (MDS): Trent Park Campus and the Picketts Lock Leisure Complex. The Wave support the recognition of MDS within the new Local Plan. However, it is important that specific reference to MDS in the Green Belt is included within Draft Policy GI2 or within a bespoke policy relating to the Picketts Lock Leisure Complex. There critically needs to be a distinction between a general brownfield site i.e. Previously Developed Land (PDL), of which there are many in the borough of various scales, and a major PDL site where development exists and where development is going to happen and should be planned for i.e. an MDS (or similar title e.g. “identified PDL”).

This is necessary to support a Plan-led approach which guides and supports development at Picketts Lock with certainty and efficiency, aligning with para. 16 of the NPPF (2019) i.e. *“plans should... contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals”*.

The new Local Plan needs to provide certainty for sites where it is known that development is going to take place, in order to secure the sustainable future of their operations. As such, we consider that for a site where ‘change’ is predicted or desirable, such as Picketts Lock, it ought to be subject to a specific policy rather than a generic policy approach to other previously developed land (PDL) in the Green Belt.

7. Picketts Lock Leisure Complex

We consider a bespoke policy should be developed for the Picketts Lock Leisure Complex as an identified MDS or identified PDL in the Green Belt. This would reflect the site’s importance as a London Plan Opportunity Area, an existing developed site and its identification within Edmonton Leaside Area Action Plan as a destination attraction for Edmonton Leaside and beyond.

This bespoke policy should set out a description of the site and its current use, followed by future aspirations for the site’s development (in accordance with the Area Action Plan and GLA guidance). This policy could also set out the criteria for which development within the MDL would be appropriate.

We would be pleased to meet with the Council to review this approach and ensure the Local Plan is sufficiently flexible but also sufficiently certain to provide the framework required for the sustainable future of the Picketts Lock Leisure Complex, given its importance to the Lee Valley Regional Park Authority’s plans for the Park’s sustainable economic future, and therefore its importance to the Borough.

8. Lee Valley Regional Park

The Lee Valley Regional Park is already an important and established part of the London’s leisure and tourism provision. There is currently no policy which sets out the future vision for development at Lee Valley Regional Park. The Wave therefore consider that Core Policy 35 (Lee Valley Regional Park and Waterways) in the Core Strategy (2010) should be carried forward in the new Local Plan.

Given the size of the public open space and need for the Council to work with other bodies, specifically the Lee Valley Regional Park Authority, we consider that the Core Policy 35 text should be included to realise the potential of this area and support the sustainable growth of the leisure and tourism industry in accordance with the NPPF (2019).



Summary

In summary, The Wave is generally supportive of the preferred approaches set out in the Issues and Options consultation document but considers that Enfield Council should review the approach to PDL and MDS in the Green Belt and include a greater focus on the importance of recreation, leisure and tourism to the Borough to secure the necessary policy support as key developments come forward. As noted, The Wave would be happy to meet with the Council to discuss this in further detail.

We trust the above comments are helpful when developing the Local Plan. If you would like to discuss any element of our client's response please do not hesitate to contact me, Sophie Hitchins or Charlotte Cook.

Yours faithfully

Nick Thompson

Senior Director, Head of Major Projects and Design

PD12134/WE/DM

28 February 2019

Planning Policy
Enfield Council
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Dear Sir / Madam

**A NEW LOCAL PLAN FOR ENFIELD 2018-2036 – REGULATION 18 CONSULTATION
WRITTEN REPRESENTATIONS
CREMATORIUM DEVELOPMENT**

We are instructed by Enfield Council's Bereavement Services ("ECBS") to make representations on 'A new Local Plan for Enfield 2018-2036', the deadline for which is 28 February 2019. ECBS are exploring the potential of providing a new crematorium within the borough to meet a clearly identified need.

The ECBS have identified a demonstrable need for a new crematorium within the Borough. The emerging Local Plan is the appropriate forum by which to allocate land in order to meet this need. At this time ECBS have undertaken initial research on potential broad locations within the borough and wish to build upon this evidence base in collaboration with London Borough of Enfield ("LBE") Planning Officers. This approach is wholly consistent with planning good practice which advocates a plan led approach to such matters.

Ageing Population of London

Paragraph 1.10E of the adopted London Plan states that the population of London in 2011 was 8.2 million and is estimated to rise to 10.11 million by 2036. The Plan also acknowledges that the number of people over 64 is projected to increase by 64 per cent (circa 580,000) to 1.49 million by 2036. The over 90's are expected to grow by 89,000 over the same period.

Whilst the population growth in London has been revised to rise to 10.8 million by 2041 within the Draft New London Plan, it is noted at paragraph 1.1.2 that the number of Londoners aged 65 or over is projected to increase by 90 per cent.

It is clear from the above that there is both a: i) growing; and ii) ageing population, which can only result in increased demand for suitable burial/cremation space in London.

Burial Need

Adopted London Plan Policy 7.23 encourages local authorities to provide burial space in close proximity to their residents, to reduce costs / time in travelling to visit deceased relations.

Draft new London Plan Policy S7 notes at paragraph 5.7.1 that the principle of proximity is supported as a general rule to address the issues of access and cost caused by the lack of available burial space across London. The paragraph references the findings of the 2011 Audit of London Burial Provision and states that:

"Some boroughs have little or no burial space available".

The 2011 Audit is therefore considered to be the most up to date evidence base, by virtue of its reference within the Draft new London Plan. The 2011 Audit also notes at paragraph 2.5 that the extent of demand for

burial space will evidently be influenced by the incidence of cremation. The Audit states that in the UK, cremation rates first exceeded burial rates in 1968. In 2008, ONS figures indicate that there were 50,476 deaths in London. In that year, there were 37,700 cremations in London crematoria, which indicates a cremation rate of approximately 75%.

The Mayor's Social Infrastructure SPG (May 2015) sets targets for the provision of burial space based upon projections of need and existing capacity as set out in the 2011 Audit of London Burial Provision. Figure 18 (Capacity Status of London Boroughs) identifies LB Enfield within the 'problematic' category in relation to burial capacity, identifying a limited supply that will run out over the next 10-20 years. This will be partially addressed through the construction of the Edmonton Cemetery extension, but the extension will not address growing demand for cremations from the borough's residents.

The SPG notes at page 84 that creating neighbourhoods that meet the needs of people at all stages of their lives extends to the provision of burial spaces. The SPG also acknowledges the findings of the 2011 Audit that approximately 75% of the deceased are cremated.

In summary, based on the increasing elderly population, pressures on existing burial space and correlation with the high proportion of cremations, there is a clear and pressing need for additional burial space and crematoria within London.

In the light of the above, ECBS instructed Peter Mitchell Associates to undertake a feasibility study for the provision of a new crematorium in the London Borough of Enfield, and to identify the area of the borough with the greatest need.

Feasibility of Delivering a New Crematorium

Paragraph 5.1 of the Peter Mitchell report outlines the follow key factors that have an impact on potential demand for a new crematorium:

- Proximity of the population to the prosed and existing crematoria;
- Population;
- Age structure;
- Mortality rates and deaths;
- Religious belief; and
- Ethnicity.

Paragraph 5.1.1 of the report refers to Competition Appeal Tribunal Case No. 1044/2/1/04 judgement of 6 July 2005 and concludes that of the series of factors that can influence bereaved people's choice of crematorium for a funeral, in most cases, the single most important factor is the travel time for people attending the funeral. The report then refers to the industry standard that a funeral party should not have to undergo more than 30 minutes' drive to a crematorium. This relates to the time taken by both relations of the deceased and the funeral cortege.

The report uses computer software to calculate travel times by road and display them graphically in the form of isochrones on a map. The exercise produced isochrones for the six existing crematoria around the London Borough of Enfield, ones of which, Enfield cemetery, is located within the borough, to the north east.

The findings of the report illustrate that:

- There is a gap in supply of a crematorium in the south east of the borough to accommodate local residents and residents of nearby boroughs within the industry accepted 30 minute drive time.
- Enfield residents are most likely to use Enfield Crematorium and New Southgate Crematorium.
- Enfield Crematorium, the only crematorium located within the borough, attracts cremations from beyond its 30 minute drive-time catchment. The journeys of those travelling more than 30 minutes is greater than the industry standard as outlined above,
- Approximately 45% of the cremations of Enfield residents are likely to take place at Enfield Crematorium and 55% at New Southgate Crematorium.
- If a new crematorium were developed around Edmonton (i.e. south east of the borough), approximately 63% of the cremations of Enfield residents would be likely to take place there.

The suitability of the existing chapels and other buildings at Edmonton cemetery were considered at Paragraph 1.7 to be too small for conversion into use as a crematorium and are also too close to residential properties, prompting the need for further feasibility work to identify a suitable location for a new crematorium.

In summary, there is an identified need for a new crematorium in the south east of the borough and it is this location the ECBS wish to explore further as part of the local plan process with the intention of securing an allocation for such a use on a suitable site.

Response to the Draft Local Plan

The draft plan sets out options for development over the next 15 years through 'good growth' principles, as endorsed by the Mayor of London. The Council notes on their consultation webpage that the key challenges to address are:

- ensuring there is enough housing to meet everyone's needs;
- creating better employment opportunities and promoting economic growth;
- reviewing infrastructure and community facilities;
- the future role of our town centres;
- creating places that promote health and wellbeing; and
- ensuring development is high quality and protects the environment.

ECBS supports these principles, and in particular the review of infrastructure and community facilities, which is considered to include suitable provision to meet burial needs in terms of capacity and choice.

Consequently, ECBS also supports the sentiments at paragraph 9.7.5 which states:

"In order to plan for existing and future growth in Enfield, the Council will support additional burial space and crematoria to cater for the requirements of different religious groups and challenging funeral demands based on an up-to-date and local identified need assessment".

The objectives of Draft Policy Approach G16 (Burial space and crematorium) are also welcomed. In particular ECBS would welcome the opportunity to work with LBE Planning Officers to identify suitable locations for a new crematoria in the south east of the borough that meet the following requirements of Policy G16:

"The Council will protect existing and support additional land to be used for burial space and crematoriums where:

- a) There is an identified need for the space;*
- b) It would not harm the amenity of nearby residents;*
- c) The landscape is maintained;*
- d) Associated built facilities are of an appropriate scale to their surroundings; and*
- e) There is no undue impact on the safety and functioning of the public highway."*

Finally, Chapter 9 of the draft local plan notes that the Council may consider amendments to the Green Belt boundary if this is necessary to meet development needs.

Paragraph 136 of the National Planning Policy Framework (2018) states that:

"Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans".

Paragraph 145 of the National Planning Policy Framework states that a local planning authority should regard the construction of new buildings as inappropriate in the Green Belt, save for a number of exceptions, unless very special circumstances can be demonstrated. Part B of paragraph 145 states that, inter alia, cemeteries and burial grounds are considered an exception to the policy resistance against new buildings in the Green Belt. This does not specifically include Crematoria.

Whilst it is appreciated that the alteration of Green Belt boundaries is a matter for the local planning authority it may become apparent through further feasibility analysis that save for a Green Belt designation, a site may provide the most suitable location for a new crematorium, to serve the needs of the borough. In the light of this, and in accordance with paragraph 136 of the NPPF, we welcome Officer engagement in the considerations of potentially suitable sites for the release from the Green Belt or Metropolitan Open Land and an allocation for a new crematorium.

To this end, and given the appreciation of the number of competing uses for available land (housing / employment / community infrastructure etc), ECBS welcome the LBE's commitment at paragraph 2.12.5 to a strategic plan-led approach to the Green Belt and the consideration of the merits of any potential Green Belt release which for the reasons stated above must be addressed in the Local Plan. It is highly likely that when balancing the different requirements that need to be addressed within the Local Plan it is a Green Belt site that affords the most appropriate location for provision of a crematorium having regard to all material considerations as outlined above.

The ECBS continue to evaluate the site options for the new crematorium and welcome the opportunity of discussing this with officers as the Local Plan evolves.

On behalf of our client, Enfield Council Bereavement Services, we welcome the opportunity to engage further on this subject with Officers in due course. Should you require any further information, please do not hesitate in contacting Will Edmonds (will.edmonds@montagu-evans.co.uk) / 020 7312 7410 or David Mabb (david.mabb@montagu-evans.co.uk) / 020 7312 7530).

Yours sincerely,

MONTAGU EVANS LLP

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By email

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let.006.21730005

26 February 2019

Dear Sir / Madam

**TOWARDS A NEW LOCAL PLAN 2036 – ISSUES AND OPTIONS – NHS
PROPERTY SERVICES**

On behalf of our client, NHS Property Services (NHSPS), please find below representations to the Issues and Options Public Consultation (Regulation 18) on the emerging Enfield Local Plan, 'Towards a New Local Plan 2036'.

Background

NHSPS is wholly owned by the Department of Health and Social Care to manage, maintain and improve NHS properties and facilities, working in partnership with NHS organisations to create safe, efficient, sustainable and modern healthcare and working environments. NHSPS has a clear mandate to provide a quality service to its tenants and minimise the cost of the NHS estate to those organisations using it.

Any savings made are passed back to the NHS. The ability of the NHS to continually review its healthcare estate, optimise the use of land, and deliver health services from modern and fit-for-purpose facilities is crucial. Reviews of the NHS estate are aimed at improving the provision of healthcare services by increasing efficiencies, including through the disposal of unneeded and unsuitable properties. This means that capital receipts from disposals, as well as revenue spending that is saved, can be used to improve facilities and services.

Importantly, a property can only be released for disposal (or an alternative use) by NHSPS once NHS clinical commissioners have confirmed that it is no longer required for the delivery of NHS services and where it is vacated of all health uses.

It should also be noted that, prior to any potential disposal on the open market, NHSPS market properties on e-PIMS (the central government's on-line property database) to other public sector organisations.

Draft policy approach SI1: Social and community infrastructure

Our client supports the overarching draft aim for Policy SI1.

Policy SI1 states that, *'The Council will work with its partners to ensure that community facilities and services are developed and modernised to meet the changing needs of our community and reflect the new approaches to the delivery of services'*, in part by *'Supporting the investment plans of educational, health, and research bodies to expand and enhance their operations having regard to the social and economic benefits they generate for Enfield, London and the wider area.'*

We believe the draft approach to dealing with proposals for the release of community facilities would support the NHS using its estate flexibly so that high quality health services can be delivered to the community. Indeed, the supporting text in paragraph 8.1.26 recognises the importance of flexibility for service providers in any policy that seeks to protect community uses, stating that such a policy should be *'flexible enough to respond quickly to the often rapidly changing needs'*.

The draft approach is that *'Where the release of a community facility building or site to other uses is proposed, evidence must be provided that the facility has been either:*

- *Assessed and identified as surplus as part of a wider strategic approach that is considered to be of local benefit, i.e. aligned with other Local Plan objectives, and having first drawn it to the attention of public providers and offered it to them, see below; or*
- *Offered to the market for the range of existing lawful uses, typically Class D1 for a period of 12 months, at a market rent or sale price benchmarked against other equivalent properties in the area. This will include drawing it to the attention of public providers and allowing for a mixed use where it can be marketed for a replacement facility with other policy compliant uses, such as affordable housing; or*
- *Shown to be unsuitable in size and scale for its location which has good access to facilities which meet similar local needs where these arise.'*

The wording of the first bullet point, which makes clear that the Council will allow the release of community facilities where these are identified as surplus as part of a wider strategic approach, appears to align well to the NHS's approach to estate strategy and is supported.

However, to ensure that there is no ambiguity, our client would welcome clear recognition of the fact that the first part of this policy applies to NHS properties that have been declared surplus by NHS clinical commissioners and are due to be released for disposal (or an alternative use) following proper consideration in line with the NHS's internal processes. Moreover, it should be explicitly recognised that the marketing of properties on e-PIMS to other public sector organisations should be seen as adequate in terms of the requirement to advertise and offer surplus properties to other public providers. Additional text should be added to the supporting text for this policy accordingly.

Summary

We trust these representations will be taken into consideration. In the meantime, should you wish to discuss our comments, please do not hesitate to contact me or one of my colleagues, Aaron Peate or Kenya Sharland.

Yours faithfully

Philip Freeman-Bentley



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Planning Policy
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PO Box 53
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EN1 3XE

Reference: Enfield Local Plan

27 February 2019

Dear Sir/Madam

**CONSULTATION ON THE ENFIELD LOCAL PLAN 2036, ISSUES AND OPTIONS
REPRESENTATIONS ON BEHALF OF NOTTING HILL GENESIS**

Notting Hill Genesis (NHG) are pleased to submit representations on the Draft Enfield Local Plan 2036, Issues and Options document, which was published for consultation on 5 December 2018.

NHG is one of the largest housing associations in the country. We own and manage nearly 64,000 homes across London and the south east. We have a record of strategic regeneration to deliver high quality market and affordable housing in Enfield.

These representations are informed by our experience both as a housing association and as a developer of high quality homes, and represents our commitment to continue to assemble sites and optimise development to ambitiously deliver both private and affordable new homes to help meet housing need in Enfield.

Notting Hill Genesis

NHG is one of the leading housing associations in the country and has been at the forefront of housing for more than 50 years. We excel in creating high quality new homes and providing a wide range of housing solutions, working closely with residents and partners to meet local needs.

Notting Hill Genesis currently manages over 1100 homes in Enfield and over the past 10 years we have delivered the regeneration of a series of run-down and underutilised sites along the North Circular Road. Across three phases we have refurbished and built approximately 550 homes. The majority of these homes have been allocated for residential development within the North Circular Area Action Plan (NCCAP)

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Bruce Kenrick House **Fax** 020 3815 0005
2 Killick St, London, N1 9FL **Email** info@nhhg.org.uk

In recent years we completed the developments of:

- Amber Court & Wells Mews (NCCAP Site 11):
 - Comprised of 15 affordable rent, 14 shared ownership and 27 market units.
- Coral Court (NCCAP Site 10):
 - Comprised of 27 rent, 21 shared ownership and 14 market units.
- Aspire (NCCAP Site 13):
 - comprised of 24 affordable rent, 92 shared ownership and 4 market units.

NHG is progressing the fourth phase of the regeneration along the North Circular Road. In August 2018 we received resolution to grant planning permission from Enfield's planning committee for a hybrid planning application delivering 86 homes and commercial uses at 188-200 Bowes Road. Furthermore, several additional sites remain to come forward, which are currently allocated for residential development within the North Circular Area Action Plan (October 2014). These sites are:

- Site 13: Ritz Parade;
- Site 16: Green Lanes Junction NW; and
- NCAAP Site 18: Green Lanes Junction SW.

Accordingly, we have also made an accompanying submission to the Council's 'Call for Sites' for the continued allocation of these sites and land at 54 Tewkesbury Terrace.

Local Plan 2036, Issues and Options

Overall, NHG welcomes the draft Plan's vision and objectives for the borough, for it to continue to grow and develop in a liveable and sustainable environment, whilst recognising the need to safeguard its heritage and natural environment.

In particular, we support the draft Plan's objectives (outlined in paragraph 2.8.2) of promoting sustainable development by focusing growth and new development in town centres and areas with good public transport accessibility, the intention to increase densities and building heights and to allow for more growth in district and local centres. The relaxation of standards for the provision of car parking and amenity space is also welcomed and will allow more housing to be delivered.

Whilst we note that no amendments to the adopted Policies Map (November 2014) are currently proposed Paragraph 2.9.1 notes that the North Circular Road (A406) is identified as an area with the potential for bringing forward development of scale. NHG agrees within this vision and, as outlined above, we have made a submission to the Call for Sites to support the continued allocation of our sites in this transport corridor and to optimise development on them, in accordance with the objectives of both the draft Local Plan and draft London Plan to make the most efficient use of land and to deliver high quality new homes.

Notwithstanding our overall support for the draft Plan's objectives, it is considered that the requirements of some policies should be amended, as noted below.

Draft Policy HE3: Locally listed and undesignated heritage assets and cultural practices (Page 69)

The draft Policy outlines that locally listed and undesignated heritage assets can make important contributions to the borough's heritage and should therefore be recognised and protected accordingly. Proposals for change will be decided by taking a balanced judgement, having regard to the significance of the heritage asset and the scale of any harm or loss.

It is our view that the policy should also recognise that development that results in the harm or loss of locally listed and undesignated heritage assets may be appropriate in circumstances where regeneration or other benefits are delivered, and provided that the development is of a high design quality that will enhance the area in accordance with the National Planning Practice Framework.

Therefore, the draft Policy should be amended to state that the "Proposals for change will be decided by taking a balanced judgement, having regard to the significance of the heritage asset, ~~and~~ the scale of any harm or loss and the benefits that will result from the works."

Draft Policy D1: Achieving design excellence (Page 77)

Part c) of the draft policy states that the Council will expect all residential developments to ensure the successful integration of homes of different tenure types, by taking a tenure-blind approach and pepper-potting mixes across a site to provide choice and opportunity of all.

NHG is a registered charity whose primary purpose is to provide homes for lower-income households. Whilst we fully support the Council's objective of integrating different tenures, it should be recognised that the practicalities of managing buildings and different tenures often necessitates separate cores and entrances to buildings. We are therefore concerned that a tenure blind approach would lead to greater difficulty in the management of buildings and greater costs / increase service charges.

Therefore, **part c)** of the draft policy should be amended to state that the Council "will expect, ~~where reasonable and practicable,~~ all residential developments to ensure the successful integration of homes of different tenure types ~~by taking a tenure-blind approach and pepper-potting mixes~~ across a site to provide choice and opportunity of all".

In addition, part f) of the draft policy outlines that the Council will ensure that design elements of a proposal are discussed and ideally agreed on at the pre-application stage for major applications. Whilst NHG acknowledges the importance of discussing design matters at the pre-application stage often comments received from officers inform the final design but the elements are not necessarily agreed in advance of the submission. There may also be schemes where the design approach is straightforward and discussions with the Council are not required. Therefore we consider that a strict requirement for matters to be agreed at the pre-application stage is too onerous, and could lead to delays in delivering schemes.

Finally, **part f)** of the draft policy should be amended to state that that the Council “*will ensure encourage that design elements of a proposal are discussed and ideally agreed at pre-application stage for major applications.*”

Draft Policy D2: Character and density (Page 79)

Part a) of the draft policy states that the Council will ensure that more tall buildings and higher density development are realised in appropriate places in the borough, through innovative high-quality design, taking into account local character and context.

NHG welcomes this approach and considers that development on sites should be optimised with careful consideration to their context.

Therefore, this policy should be retained in the draft Local Plan.

Draft Policy D3: Design for co-location and mixed use development (Page 81)

The policy supports mixed use development and outlines that development proposals will be expected to make the most efficient possible use of land, especially developments near town centres and transport hubs.

NHG welcomes this approach to optimise development in sustainable locations.

Therefore, this policy should be retained in the draft Local Plan.

Draft Policy H1: Housing growth and quality (Page 89)

The first paragraph of this draft policy outlines that 1,876 new homes will be built per annum over the plan period. Part a) outlines that the possibility for development in all places with capacity to accommodate new homes will be explored, whilst respecting local distinctiveness and protecting the borough’s environment. Paragraph c) also seeks to make the most efficient possible use of land by promoting higher density development in suitable, accessible locations.

Again, NHG supports this approach to optimise development in sustainable locations.

Therefore, this policy should be retained in the draft Local Plan.

Draft Policy H2: Affordable Housing (Page 93)

The first paragraph of this draft policy outlines that the Council will set a strategic target of 50% additional new homes to be delivered across the borough to be affordable, having regard to a number of factors including site context and character, as well as design-related issues. This represents an increase of 10% over the affordable housing requirement set out in Enfield’s adopted policy, but is in line with the requirements of the draft London Plan (date).

The second paragraph also states that the Council will not require viability assessments on schemes which provide a minimum of 35% affordable housing on site without grant, which is also in line with the draft London Plan.

Part c) outlines that, on sites capable of delivering 10 or more dwellings or which have a combined floorspace of 1,000 sqm or more, the Council will expect development to achieve at least 30% affordable housing delivery to be social rent and London affordable rent; 30% intermediate affordable housing product including London Living Rent and Shared Ownership and the remaining 40% to be determined by the Council in line with updated identified need. This is in accordance with the requirements of Policy H7 of the

However, the emerging policy should recognise that an appropriate tenure mix will be determined by taking into account a range of different factors including viability, the site's context and constraints, and in some circumstances a greater proportion of intermediate dwellings may be appropriate to meet a particular need. In addition, consideration should be given to the type of affordable housing already delivered as part of previous phases of strategic schemes.

Therefore, part c) of the draft Policy should be amended to state that "*Tenure mix should have regard to the site context and constraints, and the delivery of affordable housing as part of previous phases of strategic development. Proposals should target at least 30% of affordable housing delivery [...]*".

Draft Policy H3: Small sites (Page 94)

The fourth paragraph of the draft policy outlines that, in line with draft Policy H2, affordable housing contributions will be sought from all schemes resulting in a net gain of one or more units, in line with need and viability, as established in updated evidence.

Paragraph 5.3.11 (page 92) outlines that it is the Council's view that an affordable housing requirement on sites providing fewer than 10 homes can be justified where evidence can demonstrate the role that these sites play in supporting affordable housing delivery in the borough, and that sites would remain viable.

However, neither the draft policy or the supporting text provides any guidance as to how the affordable housing requirement should be calculated, particularly given that developments of less than 10 homes will have different viability constraints to larger schemes. The policy should recognise that on site provision of affordable housing will not always be appropriate, and outline circumstances where a payment in lieu will be acceptable and how such a payment would be calculated. In addition, any requirement for a viability appraisal would add to the cost of smaller schemes and lead to delays in the determination of these planning applications, potentially hampering the delivery of housing on small sites.

We note that Paragraph 63 of the National Planning Policy Framework states that provision of affordable housing should not be sought for residential developments that are not major developments, other than in rural areas.

Therefore, the policy and supporting text should be amended to outline the circumstances where affordable housing will be required for small sites, how this requirement would be calculated and in what circumstances a payment in lieu will be appropriate rather than on site provision.

Draft Policy H4: Housing Mix (Page 96)

Paragraph 5.5.6 (page 95) outlines that any design guidance specific to family housing will/should be applied to all two or more bedroom units.

Part a) of draft Policy H4 states that the Council will establish a borough wide strategic target for affordable housing, based on up to date local needs evidence, of 40-50% two or more bedroom dwellings.

In addition, part c) outlines that, for market housing and London Affordable Rent, the Council expects development to deliver homes in a mix of sizes informed by site characteristics, identified local housing

NHG welcomes the greater flexibility for unit sizes provided by the draft policy, and the recognition that unit mix should ultimately be determined by site specific considerations.

Therefore, this policy should be retained in the draft Local Plan.

Draft Policy H5: Private rented sector and build-to-rent (Page 98)

The draft policy outlines that the Council will support proposals for standalone build to rent developments or build to rent blocks on large mixed use tenure developments, in appropriate locations.

NHG support this policy approach and consider that build to rent is an important housing product that complements existing housing supply and is important to meet the needs of London's population.

Therefore, this policy should be retained in the draft Local Plan.

Draft Policy TC2: Successful town centres (Page 135/136)

Paragraph 7.2.5 (page 133) recognises a need for a flexible approach to land uses in which a wide range of retailing, services and community activities are promoted as part of a healthy town centre mix.

Part c) of draft policy TC2 (page 135) outlines that the Council will support the diversification of uses and encourage innovation and flexibility so that uses can expand and/or change between Uses Classes, subject to demand and appropriate permissions/agreements. Part d) promotes town centres as place for business and networking. Part f) seeks a mix of shop sizes and types. On page 135 (Surplus car parks) the policy also promotes the development of a mixture of housing within car parks of the borough's centres in certain circumstances.

In addition Paragraph e) (page 135) states that the Council will support the creation or redevelopment of used or underused space above or below ground floor units for residential accommodation in centres.

NHG supports the flexible approach proposed by this draft policy and considers that it will optimise the development of town centre sites whilst supporting sustainable commercial uses and healthy town centres.

Therefore, this policy should be retained in the draft Local Plan.

Draft Policy SI1: Social and community infrastructure (Page 150/151)

Part f) of the draft policy states that the Council will retain or re-provide community facilities where a local need exists and can be clearly demonstrated. The “proposals involving the loss of community infrastructure” sub-section (page 151) of the draft policy outlines that the community facilities can be released to other uses in certain circumstances.

However, the policy should note that the re-provision of existing community infrastructure for other community uses will be supported as part of development proposals, and the premises should be flexible to allow occupation by a range of community activities.

Therefore, part f) of the draft Policy should be amended to state that the Council will support “Retaining or re-providing community facilities for existing and alternative community uses where a local need exists and can be clearly demonstrated. Replacement community facilities should be flexible to allow occupation by a range of community activities.”

Draft Policy SI2: Health and Wellbeing (Page 155)

The ‘we will expect’ subsection of the draft policy outlines that the Council will expect major development proposals to be accompanied by a health impact assessment (HIA), detailing how they respond to contributions to health and wellbeing, including details of ongoing management or mitigation of issues where necessary.

NHG supports sustainable development, and the creation of a high quality and healthy environment; however, the policy should recognise that the factors that are considered in a HIA are already assessed in Design & Access, Planning, Transport and Sustainability/Energy Statements, assessments which are already required for major developments. It is therefore considered that the requirement for a HIA is unnecessary and increases the burden on applicants.

Therefore, the first bullet point of the draft policy’s ‘we will expect’ subsection should be deleted, removing the requirement for a HIA.

Draft Policy T2: Reducing the impact of private vehicles on our streets (Page 188)

Part e) of the draft policy outlines that the Council will adopt maximum car parking standards and car-lite housing wherever feasible. However, neither the policy or the supporting text outlines what standards will be applied or whether those within the London Plan should be used.

Therefore, the policy should be updated to clarify the relevant car parking standards.

Draft Policy T3: Making active travel the natural choice (page 188)

Part a) of the policy outlines that developments are to include the provision and maintenance of convenient accessible and safe secure cycle parking within the boundary of the site. However, neither the policy or the supporting text outline the standards that will apply or whether those within the London Plan should be used.



Therefore, the policy should be updated to clarify the relevant cycle parking standards. These standards should then be subject to public consultation.

Summary

Overall, NHG welcomes the Council's vision for Enfield and steps to optimise sustainable growth across the Borough. The amendments we have proposed above are informed by our experience as both a housing association and a developer of high quality accommodation across London and the south east. It is considered that the suggested amendments to the policy will allow development to be optimised in the borough and for housing to be delivered to ambitiously meet housing need.

NHG are committed to continuing to work in partnership with the Council to deliver these strategic goals, the regeneration of sites in the borough and benefits to local communities.

We look forward to receiving confirmation that these representations have been received. Should you have any queries please do not hesitate to contact Danielle Lennon on the details below.

Yours faithfully

Danielle Lennon
Planning Manager

Notting Hill Genesis
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Mark Wells
Origin Housing Limited
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28th February 2019

Dear Sir/Madam

**CONSULTATION ON THE ENFIELD LOCAL PLAN 2036, ISSUES AND OPTIONS
REPRESENTATIONS ON BEHALF OF ORIGIN HOUSING**

Origin Housing are pleased to submit representations on the Draft Enfield Local Plan 2036, Issues and Options document, which was published for consultation on 5 December 2018.

We are a registered social landlord, managing over 6,500 homes in London and Hertfordshire. We provide affordable housing in our communities as well as related care and support services to the people who live in them. We have a record of delivering high quality market and affordable housing across London.

These representations are informed by our experience both as a housing association and a developer.

Origin Housing

Origin Housing started life in 1924 as St. Pancras House Improvement Society, a charitable organisation founded by Father Basil Jellicoe because of a belief that good quality affordable housing is a foundation for a successful life. Thanks to a subsequent series of mergers with other organisations: Humanist Housing Association, Griffin Homes, and Lee Housing Association, we now work in 14 areas across North London and Hertfordshire.

We want to provide homes that people are proud to live in and strive to be a top-performing landlord, property manager and provider of care and support services. In building new homes our aim is to help people and neighbourhoods to thrive.

Origin Housing currently manages over 1,119 homes in Enfield and are currently progressing a regeneration scheme that would deliver high quality market and affordable homes in the borough on one of our existing sites. We have, therefore also made a submission to the Council's 'Call for Sites' for the allocation of our land at Gilda Avenue, to support the strategic objective of optimising development and ambitiously delivering against housing needs.

Origin Housing Representations

Local Plan 2036, Issues and Options

Overall, Origin Housing welcomes the draft Plan's vision and objectives for the borough, for it to continue to grow and develop in a liveable and sustainable environment, and whilst recognising the need to safeguard its heritage and natural environment.

In particular, we support the draft Plan's objectives (outlined in paragraph 2.8.2) of promoting sustainable development by focusing on town centres and areas with good public transport accessibility, its intention to raise densities and building heights, allow for more growth in district and local centres. The relaxation of standards for the provision of car parking and amenity space will allow more housing to be delivered.

We note that no amendments to the adopted Policies Map (November 2014) are currently proposed but note that Figure 2.9 (page 46) identifies the 'Eastern Corridor', an area with a large concentration of business with the potential to be the next global knowledge region. Paragraph 2.11.4 (page 47) outlines that it could be a good location for mixed uses and supports the provision of employment and housing to help create sustainable communities. Part k) of draft Policy E2 specifically identifies the Alma Road Industrial Estate for managed release of employment land for mixed use development, including residential.

Origin Housing supports the draft Plan's support for the strategic development of land in the Eastern Corridor and its suitability for high density and residential development.

Notwithstanding our overall support for the draft Plan's objectives, it is considered that the requirements of some of the draft policies should be amended, as noted below.

Draft Policy D1: Achieving design excellence (Page 77)

Part c) of the draft Policy states that the Council will expect all residential developments to ensure the successful integration of homes of different tenure types by taking a tenure-blind approach and pepper-potting mixes across a site to provide choice and opportunity of all.

Origin Housing is a registered charity whose primary purpose is to provide homes for lower-income households. Whilst we fully support the Council's objective of integrating different tenures, it should be recognised that the practicalities of managing buildings and different tenures often necessitates separate cores and entrances to buildings. We are therefore concerned that a pepper potting approach would lead to greater difficulty in the management of buildings.

Therefore, **part c)** of the draft Policy should be amended to state that the Council "*will expect, **where reasonable, all residential developments to ensure the successful integration of homes of different tenure types across a site to provide choice and opportunity of all***".

In addition, part f) of the draft policy outlines that the Council will ensure that design elements of a proposal are discussed and ideally agreed on at pre-application stage for major applications. Whilst Origin Housing acknowledges the importance of discussing design matters at pre-application stage, we consider that a

Origin Housing Representations

strict requirement for matters to be agreed at pre-application stage to be onerous, and could lead to delays in delivering schemes.

Finally, **part f)** of the draft Policy should be amended to state that that the Council “*will encourage that design elements of a proposal are discussed and ideally agreed at pre-application stage for major applications.*”

Draft Policy D2: Character and density (Page 79)

Part a) of the draft Policy states that the Council will ensure that more tall buildings and higher density development are realised in appropriate places in the borough through innovative high-quality design, taking into account local character and context.

Origin Housing welcomes this approach and considers that development on sites should be optimised with careful consideration to their context.

Therefore, this policy should be retained in the draft Local Plan.

Draft Policy D3: Design for co-location and mixed use development (Page 81)

The policy supports mixed use development and outlines that development proposals will be expected to make the most efficient possible use of land, especially developments near town centres and transport hubs.

Origin Housing welcomes this approach to optimise development in sustainable locations.

Therefore, this policy should be retained in the draft Local Plan.

Draft Policy H1: Housing growth and quality (Page 89)

The first paragraph of this draft Policy outlines that 1,876 new homes will be built per annum over the plan period. Part a) outlines that the possibility for development in all places with capacity to accommodate new homes will be explored whilst respecting local distinctiveness and protecting the borough’s environment. Paragraph c) also seeks to make the most efficient possible use of land by promoting higher density development in suitable, accessible locations.

Again, Origin Housing supports this approach to optimise development in sustainable locations.

Therefore, this policy should be retained in the draft Local Plan.

Draft Policy H2: Affordable Housing (Page 93)

The first paragraph of this draft policy outlines that the Council will set a strategic target of 50% additional new homes delivered across the borough to be affordable, having regard to a number of factors including site context and character, as well as design-related issues. This represents an increase of 10% over the affordable housing requirement set out in Enfield’s adopted policy, but is in line with the requirements of the draft London Plan.

Origin Housing Representations

The second paragraph also states that the Council will not require viability assessments on schemes which provide a minimum of 35% affordable housing on site without grant, which is also in line with the draft London Plan.

Part c) outlines that, on sites capable of delivering 10 or more dwellings or which have a combined floorspace of 1,000sqm or more, the Council will expect development to achieve at least 30% of affordable housing delivery to be social rent and London affordable rent; 30% intermediate affordable housing product including London Living Rent and Shared Ownership and the remaining 40% to be determined by the Council in line with updated identified need. This is in accordance with the requirements of Policy H7 of the draft London Plan.

However, the emerging policy should recognise that an appropriate tenure mix will be determined by taking into account a range of different factors including viability, site's context and constraints, and in some circumstances a greater proportion of intermediate dwellings may be appropriate to meet a particular need. In addition, consideration should be given to the type of affordable housing already delivered as part of previous phases of strategic schemes.

Therefore, part c) of the draft Policy should be amended to state that *"Tenure mix should have regard to the site context and constraints, and the delivery of affordable housing as part of previous phases of strategic development. Proposals should target 30% of affordable housing delivery [...]"*.

Draft Policy H3: Small sites (Page 94)

The fourth paragraph of the draft Policy outlines that, in line with draft Policy H2, affordable housing contributions will be sought from all schemes resulting in a net gain of one or more units, in line with need and viability as established in updated evidence.

Paragraph 5.3.11 (page 92) outlines that it is the Council's view that an affordable housing requirement on sites providing fewer than 10 homes can be justified where evidence can demonstrate the role that these sites play in supporting affordable housing delivery in the borough, and that sites would remain viable.

However, neither the draft Policy or the supporting text provides any guidance as to how the affordable housing requirement should be calculated, particularly given that developments of less than 10 homes will have different viability constraints to larger schemes. The policy should recognise that on site provision of affordable housing will not always be appropriate, and outline circumstances where a payment in lieu will be acceptable and how such a payment would be calculated. In addition, any requirement for a viability appraisal would add to the cost of smaller schemes and lead to delays in the determination of these planning applications, potentially hampering the delivery of housing on small sites.

Therefore, the policy and supporting text should be amended to outline the circumstances where affordable housing will be required for small sites, how this requirement would be calculated and in what circumstances a payment in lieu will be appropriate rather than on site provision.

Draft Policy H4: Housing Mix (Page 96)

Paragraph 5.5.6 (page 95) outlines that any design guidance specific to family housing should be applied to all two or more bedroom units.

Origin Housing Representations

Part a) of draft Policy H4 states that the Council will establish a boroughwide strategic target for affordable housing, based on up to date local needs evidence, of 40-50% two or more bedroom dwellings.

In addition, part c) outlines that, for market housing and London Affordable Rent, the Council expects development to deliver homes in a mix of sizes informed by the development site characteristics, identified local housing need assessment, and the need to deliver mixed and balanced communities.

Origin Housing welcomes the greater flexibility for unit sizes provided by the draft policy, and the recognition that unit mix should ultimately be determined by site specific considerations.

Therefore, this policy should be retained in the draft Local Plan.

Draft Policy H5: Private rented sector and build-to-rent *(Page 98)*

The draft Policy outlines that the Council will support proposals for standalone build to rent developments or build to rent blocks on large mixed use tenure developments, in appropriate locations.

Origin Housing support this policy approach and consider that build to rent is an important housing product that complements existing housing supply and is an important product to meet the needs of London's population.

Therefore, this policy should be retained in the draft Local Plan.

Draft Policy TC2: Successful town centres *(Page 135/136)*

Paragraph 7.2.5 (page 133) recognises a need for a flexible approach to land uses in which a wide range of retailing, services and community activities are promoted as part of a healthy town centre mix.

Part c) of draft Policy TC2 (page 135) outlines that the Council will support the diversification of uses and encourage innovation and flexibility so that uses can expand and/or change between uses classes, subject to demand and appropriate permissions/agreements. Part d) promotes town centres as place for business and networking. Part f) seeks a mix of shop sizes and types. On page 135 (Surplus car parks) the policy also promotes the development of a mixture of housing within car parks of the borough's centres in certain circumstances.

In addition Paragraph e) (page 135) states that the Council will support the creation or redevelopment of used or underused space above or below ground floor units for residential accommodation in centres.

Origin Housing supports the flexible approach proposed by this draft policy and considers that it will optimise the development of town centre sites whilst supporting sustainable commercial uses and healthy town centres.

Therefore, this policy should be retained in the draft Local Plan.

Draft Policy SI2: Health and Wellbeing *(Page 155)*

The 'we will expect' subsection of the draft Policy outlines that the Council will expect major development proposals to be accompanied by a health impact assessment (HIA), detailing how they respond to

Origin Housing Representations

contributions to health and wellbeing, including details of ongoing management or mitigation of issues where necessary.

Origin Housing supports sustainable development, and the creation of a high quality and healthy environment; however, the policy should recognise that the factors that are considered in a HIA are already assessed in Design & Access, Planning, Transport and Sustainability/Energy Statements, assessments which are already required for major developments. It is therefore considered that the requirement for a HIA is unnecessary and increases the burden on applicants.

Therefore, the first bullet point of the draft Policy's 'we will expect' subsection should be deleted, removing the requirement for a HIA.

Draft Policy T2: Reducing the impact of private vehicles on our streets (Page 188)

Part e) of the draft policy outlines that the Council will adopt maximum car parking standards and car-lite housing wherever feasible. However, neither the policy nor the supporting text outlines what standards will be applied or whether those within the London Plan should be used.

Therefore, the policy should be updated to clarify the relevant car parking standards. These standards should then be subject to public consultation.

Draft Policy T3: Making active travel the natural choice (page 188)

Part a) of the policy outlines that developments are to include the provision and maintenance of convenient accessible and safe secure cycle parking within the boundary of the site. However, neither the policy nor the supporting text outline the standards that will apply or whether those within the London Plan should be used.

Therefore, the policy should be updated to clarify the relevant cycle parking standards. These standards should then be subject to public consultation.

Summary

Overall, Origin Housing welcomes the Council's vision for Enfield and steps to optimise sustainable growth across the Borough. The amendments we have proposed above are informed by our experience as both a housing association and a developer of high quality accommodation across London. It is considered that the amendments to the policy will allow development to be optimised in the borough and for housing to be delivered ambitiously against housing need.

We look forward to receiving confirmation that these representations have been received. Should you have any queries please do not hesitate to contact Mark Wells on the details below.

Yours faithfully

Mark Wells
Assistant Director of Development



The Office
14 Harcourt Close
Henley on Thames
OXON, RG9 1UZ

28th February 2019

Planning Department
Enfield Council
Civic Centre
Silver Street
Enfield
EN1 3XY

Dear Sir / Madam

**TOWN AND COUNTRY PLANNING (LOCAL PLANNING) (ENGLAND) REGULATIONS 2012
REGULATION 19 CONSULTATION
ENFIELD LOCAL PLAN 2036**

Quadrant Town Planning is instructed by **Barnet & Southgate College, High Street, Southgate, N14 6BS**, to submit to you the enclosed representations on the Enfield Local Plan 2036. These submissions have been prepared having regard to the test of soundness outlined in the NPPF, namely the requirement for the plan to be positively prepared and for its policies and approach to be justified, effective and consistent with national policy, as follows:

- **Justified:** the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.
- **Effective:** the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities.
- **Consistent with national policy:** the plan should enable the delivery of sustainable development in accordance with the policies in the framework.

In accordance with paragraph 35 of the NPPF, the College fully supports Enfield's endeavours in seeking to provide a robust policy framework to support and guide new development across the Borough and to meet the strategic growth expectations set by the London Plan. The College is keen to play a part in supporting the economic, social and environmental aspirations of the Borough. In order to optimise the College's role in delivering education and training within the Borough, the Local Plan needs to provide strategic and detailed policy support for new education facilities.

Accordingly, we set out in this document relevant background to the College, including its current position and future objectives, and the need for policy support in order to facilitate its short and long term aims.

Barnet & Southgate College

Barnet & Southgate College is a major Further Education provider in North London with some 13,000 full and part time students. The College is based on 3 main campuses located at Colindale, Chipping Barnet and Southgate, the latter of these being located within Enfield Borough.

The College provides a wide range of courses including:

- A levels
- Apprenticeships
- Technical and professional qualifications
- Foundation Degrees
- Higher Education
- Work-based training
- Education and employment pathways for students with learning difficulties and disabilities (LLDD)

The Southgate campus offers a mix of A level courses and apprenticeships, alongside a dedicated LLDD facility and Automotive Technologies workshops. In addition, the campus provides a specialist teaching facilities for:

- Centre for Dental Sciences
- Centre for Excellence for Technology-Enhanced Care (CETEC)

This provision supports education and training in key growth sectors and the College aims to become the London hub for telecare and assisting living technologies training.

At Southgate, the College not only seeks to provide students of all ages with the right academic qualifications, but seeks to equip them for the world of work. The College works closely with employers and economists to analyse the job market in order to assess the skills gap and responds to that through delivering appropriate work-based training and courses which lead directly to employment. Work placements and industry experience are integral to most courses and provide students with the skills to secure employment or move into Higher Education.

The College offers a range of Higher Education courses and has partnership arrangements with the Universities of Bolton, Derby, Hertfordshire and Middlesex.

Within Enfield Borough, Barnet and Southgate College is a major provider of post 16 education and it is important that this is recognised within the Local Plan.

Southgate Campus

The Southgate campus is located in a highly sustainable location, some 250m south of Southgate Circus underground station. It comprises a total of 18,035 sq m of floorspace in a range of buildings, many of which were built in the 1960s and '70s and are now reaching the end of their life. A number of buildings are in a poor condition and are no longer functionally suitable.

The Campus is bounded by a mixture of commercial properties to the north and residential properties to the south. The College's buildings do not have an immediate presence on High Street, but are located behind the former library building, post office sorting office and residential properties located on the frontage.

There is a long term aim to increase the College’s presence on High Street through the potential redevelopment of the library building with a mixed use scheme accommodating education, library and residential uses. The public library is currently temporarily housed on the campus as the College is using the library building for decant whilst works are underway at the campus. A joint venture on the library plot, together potentially with the post office site, would enable the College to realise its development strategy for the campus and this intention should be reflected in the Local Plan.

Improvements have been undertaken at the campus, including the construction of a new LLDD building for disabled students and those with learning difficulties, which opened in 2015, and work is currently underway to Main Block to create a STEM Hub (focussing on Science Technology Engineering and Maths) comprising the recladding of the exterior, together with internal improvements. Improvements to E and W Blocks are also underway.

Masterplan Proposals

The College has prepared a Masterplan which seeks to renew the Southgate campus on a phased basis and is currently engaged in pre application consultation with Enfield Council. It is important therefore that the Local Plan supports the principles of the Masterplan.



Figure 1: Proposed Southgate Campus Masterplan

The key aim of the Masterplan is to rationalise the Southgate campus through the demolition of redundant buildings, the erection of new modern teaching facilities to meet the future needs of the College and the identification of surplus plots for release to alternative uses. The site offers significant potential, alongside neighbouring plots, to create a high quality, innovative learning environment to serve the Borough.

Call for Sites

The Masterplan will provide significant investment in the campus and lead to a more intensive utilisation of the site in line with Local Plan policies. In turn, this will potentially lead to the release

of surplus plots for alternative uses, namely residential. The constrained nature of the campus means that readily accessible plots are not easily identifiable, and at this stage we are not proposing to identify a plot, but earmark the potential of part of the campus to make a valuable contribution towards meeting Enfield's housing needs up to 2036 as part of the Borough's Call for Sites.

Representations

Overall the College supports the Draft Vision for Enfield, specifically **Paragraphs 1.6.1, 2.1.2, 2.3.2**. The College will play an important part in realising that vision.

Specifically in respect of education and training, the College supports **Paragraphs 6.1.1 - 6.5.2** in seeking to promote a strong and competitive economy in Enfield.

In light of the College's aspirations, as outlined above, we attach objections on the following paragraphs and Policies of the draft Local Plan:

- Paragraph 6.5.5: proposed amendment
- Policy E5 Skills and Access to Employment: support, plus amendment
- Policy S11 Social and Community Infrastructure: support, plus amendment
- Call for Sites

We trust these representations are of assistance in formulating and finalising the policy framework for Enfield. We would be pleased to provide further clarification should this be of assistance.

Yours faithfully

LOUISE MORTON

POLICY	E5 Skills and Access to Employment
PARAGRAPH	6.5.5
PAGE	P 121
REPRESENTATION	SUPPORT WITH PROPOSED AMENDMENT

Draft Policy E5 aims to promote skills and access to employment in the Borough and advises that the Council will work alongside partners to improve existing facilities and provide new facilities, including within the Higher and Further Education sector. The College supports this approach. However, we propose the following amendments:

1. This policy provides a good springboard for the Masterplan at Southgate and the College supports its overall aims. However, we seek clarification in bullet point d) as follows:

*“d) Working with providers and partners to support the **provision and expansion** of higher and further education colleges and universities within the borough to provide new training opportunities for residents.”*

At present as currently drafted, the policy does not support the expansion of existing education facilities and the additional wording above would facilitate this. It is vital that there is clear policy support for existing providers to expand on their current sites. With the increased growth pressures on Enfield, it will be necessary to increase the provision of education infrastructure at all levels and the policy should specifically support the intensification of uses on existing sites. This would be in line with Enfield’s acknowledgement that there is a need to accommodate growth on sustainable sites.

2. Given the role of Barnet and Southgate College within the Borough, it is important that the College is properly acknowledged within the Plan. In addition to CONEL, **paragraph 6.5.5 should refer to Barnet and Southgate College.**
3. The current Core Strategy includes **Policy CP8** which specifically supports the on-site renewal and expansion of the College and **we seek reinstatement of this policy.**

POLICY	SI1 Social and Community Infrastructure
PAGE	P 150
REPRESENTATION	SUPPORT WITH PROPOSED AMENDMENT

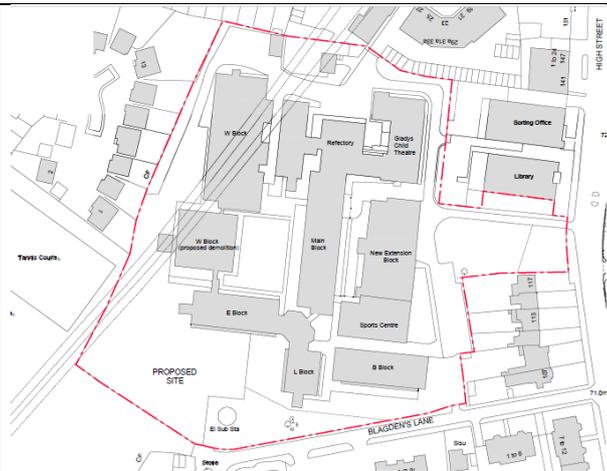
Draft Policy SI1 has two aims: firstly, to promote new social and community infrastructure; and secondly, to prevent the loss of community infrastructure to alternative uses. Barnet and Southgate College makes an important contribution towards the provision of post 16 education and training within the Borough and we support the principles of this policy. However, we propose the following amendment:

The second aim raises a concern with regard to the potential release of surplus assets for residential development. The draft policy requires any surplus assets to be first offered to other public providers and only if they do not want it can the asset be released; or secondly for the asset to be placed on the market for 12 months in order to test the demand from any other D1 provider. This places an onerous requirement on the College and we object to this part of the policy. Specifically, where the College has identified a surplus asset as part of a Property Strategy or Masterplan, the asset will be required to be disposed of in order to fund improvements in the campus. Securing an appropriate capital receipt is therefore critical to this process, and this would be hindered should the asset have to be sold to another community user.

We recommend an additional criterion at the end of the policy which indicates that the release of a community facility to other uses will be permitted provided the facility has been:

“identified as being surplus to requirements and its release would act as enabling development to cross-fund improvements in community facilities elsewhere in Enfield.”

The additional criteria would enable the College to reinvest in its estate. It would be necessary for the social and community provider to demonstrate that the disposal was required as enabling development in order to facilitate improvements to its provision elsewhere.

POLICY	Call for Sites
PAGE	P 31
REPRESENTATION	SITE SUBMISSION FOR RESIDENTIAL
LOCATION	Barnet and Southgate College High Street Southgate N14 6BS
SITE LOCATION PLAN	 <p>The site location plan shows the layout of Barnet and Southgate College. Buildings are labeled: W Block, W Block (proposed demolition), Main Block, Refectory, Sports Centre, Theatre, Library, Sorting Office, New Extension Block, Sports Centre, E Block, L Block, and B Block. A red outline indicates the 'PROPOSED SITE' located between the Main Block and the Sports Centre. Surrounding streets include High Street, Blagden's Lane, and Tennis Courts.</p>

The plan seeks to accommodate growth across the Borough up to 2036, whilst balancing the requirement for environmental improvements and zero carbon aims, leading to a better quality of life for all residents. We support the aims of the draft Plan to accommodate aspirational high levels of growth in order to meet the strategic requirements contained in the London Plan.

As part of the implementation of Barnet and Southgate College’s Masterplan, it is anticipated that surplus land will be identified, which could be released at some point in the future for housing. At this stage, we are unable to identify the specific plot, but anticipate that a site of up to 0.25 ha could be identified which could accommodate up to 30 units.

The College is the freeholder of the site. The site is currently used for education purposes and that provision would be consolidated on to other parts of the site through the implementation of the Masterplan.

Furthermore, there is the potential to bring forward a mixed use scheme, including residential, education and employment uses, by co-operating with adjoining land owners in respect of the library and post office sorting office. Whilst these plots fall outside the College’s ownership, their location immediately adjacent to the College, offers significant opportunity for a mixed use scheme and they should be identified in the Local Plan as such.

Our ref: Q080620/tw/gl

Your ref:

Date: 27 February 2019



The Local Plan Team
Enfield Borough Council
Silver Street
London
EN1 3XA

By email

Dear Sirs

**A New Local Plan for Enfield (2018 – 2036)
Regulation 19 Consultation
Responses on behalf of IKEA Properties Investments Ltd ('IKEA')**

IKEA are grateful for the opportunity to provide comments, as part of the consultation, on the emerging Local Plan. IKEA are a key business and investor in the London Borough of Enfield ('LBE').

The Company's store at Glover Drive, lies at the heart of the Meridian Water regeneration area. The Company are a major employer in this part of the Borough the area, employing in the region of 500 people directly, of which circa 85% live in the local area/nearby boroughs. In addition, the Company rely upon a supply chain within the Borough, and North London which results in indirect employment for many people in this area. In addition, the store has been operating for 14 years, and is a long-established retail destination, serving the furniture and homeware shopping needs of residents in North London, and beyond it.

As a consequence, the Company have a strong interest in a LBE's planning policy and its potential effects on their business and operations.

Summary of Representations

IKEA support LBE's draft Vision (page 35) for the Borough, and in particular the spatial approach to promoting 'good growth'¹.

¹ Defined in the London Plan as 'working to rebalance development in London towards more genuinely affordable homes for working Londoners to buy and rent and it's about delivering a more socially integrated and sustainable City, where people have more of a say and growth brings the best out of existing places while providing new opportunities to communities...what we need is growth that allows us to build thousands of genuinely affordable homes at the same time as creating a more inclusive, greener and safer city that supports the health and well being of all Londoners.'



Most notably:

1. IKEA's support for the Plan's growth ambitions is, however, conditional on whether it can be proven that it can be sustainably accommodated within the Borough's existing (or planned) infrastructure and environment, without any unacceptable impacts to the immediate and wider area.
2. The capacity of the Borough's environment and infrastructure and, therefore, the Borough's capacity for further development, has not yet been fully assessed, as recognised at paragraph 1.8.6² of the draft Plan. Consequently, the Plan's growth strategy cannot be soundly determined at this stage, and all potential options should remain open until the appropriate capacity, transport assessment and evidence base has been concluded.
3. LBE have identified five broad options, to accommodate the majority of new development. IKEA support the options in principle, subject to a demonstration of appropriate capacity to accommodate growth.
4. Within these options, IKEA have a specific interest in the approach in the Eastern Corridor and the Industrial Areas (ECandIA)³, given the Company's store is located in areas with such designations.
5. The growth option for the ECandIA is centred on intensifying the use of land, thereby increasing development. It is especially important if this growth option is to be adopted in the Local Plan, that a full and thorough understanding of the infrastructure and environmental capacity for development is understood.
6. The environmental and infrastructure capacities are not yet understood, and as a consequence IKEA reserve any views on the appropriateness of this growth strategy until the evidence is available.
7. The ECandIA contains Meridian Water, in which IKEA's store is located. Meridian Water is identified as an area for major growth in the existing Development Plan (LBE's Core Strategy, 2010), namely 5,000 new homes and 3,000 new jobs, along with infrastructure improvements to public transport provision.
8. IKEA support the regeneration of Meridian Water and the growth ambitions for this area. It is, however, crucial to the future regeneration of this area, that IKEA's operational needs are not adversely impacted by intensification of development in this area.

² *'Although we have done much engagement, we will still need to continue to collect evidence to support our approach'.*

³ This is an area largely to the east of the A10, within the London to Cambridge growth and innovation corridor.

9. LBE prepared a draft Area Action Plan ('AAP')⁴ which was considered at Examination in Public in Autumn 2018. IKEA objected to this AAP.
10. IKEA's objections were focussed, inter alia, on the lack of justification, especially any transport assessment for the scale of development and growth proposed in the area. The AAP promoted a growth strategy that sought to double the number of new homes and new jobs from that supported in the Core Strategy, ie, 10,000 new homes and 6,000 new jobs.
11. The Inspector appointed to determine the soundness of the AAP concluded the scale of growth was not based on a sound evidence and recommended the AAP's growth ambitions were tempered, until/unless evidence provided it was capable of a higher level than promoted in the adopted Core Strategy.
12. LBE have subsequently agreed to scale back the growth levels originally promoted in the AAP and undertake further transport and environmental capacity work to determine the capacity in Meridian Water to accommodate growth beyond that identified in the Core Strategy.

Sound Evidence Base

In order for a Local Plan to be sound, it is necessary to pass the four tests of soundness. The evidence base of the Plan is key to determining the soundness of the Plan, in a number of ways:

1. Soundness Test No 1: Positively Prepared – A Plan must be prepared on a strategy which seeks to meet the objectively assessed development needs of an area, and the infrastructure requirements, as well as unmet requirements from other areas where it is reasonable to do so.
2. Soundness Test No 2: Justified – For a Plan's strategy to be appropriate, it must be based on a full understanding of the needs and capacity of the Borough.
3. Soundness Test No 3: Effective – For a Plan to be effective, it must be deliverable and, therefore, based on a full understanding of constraints in achieving the level of growth proposed.
4. Soundness Test No 4: Consistent with National Policy – A Plan should enable the delivery of sustainable development, which accords with the NPPF.

⁴ Edmonton Leaside proposed submission Area Action Plan (January 2017).

The draft Local Plan sets an undefined growth ambition for the Borough, recognising that high levels of growth are necessary to meet the Borough's needs, but cannot be defined until appropriate evidence has been established. IKEA support this approach to defining precise levels of growth only once an appropriate evidence has been collated and assessed. To determine a spatial strategy without such evidence would be unsound, as recognised in the recent conclusions from the Examination of the Edmondton Leaside AAP.

Growth in the Eastern Corridor and Industrial Areas

IKEA's store falls in the southern sector of the Eastern Corridor, most specifically within the Meridian Water area.

Regeneration and intensification of the use of land in this part of the Borough is supported by IKEA. The intensification of the use of land, however, must be carefully controlled and permitted only where it is sustainable, and most notably where there is appropriate infrastructure and environmental capacity and where it doesn't not have a detrimental impact on IKEA's operations.

Within the Meridian Water area specifically, IKEA are engaged with LBE's Officers in determining the capacity of the local infrastructure to satisfy new development in this area.

At present, there is insufficient evidence to support LBE's growth aspirations for Meridian Water, as expressed by the Inspector in examining the AAP.

IKEA, consequently, cannot support further growth in this area, beyond that in the Core Strategy, without appropriate evidence to demonstrate that this would not harm IKEA's operations.

Any adverse implications on IKEA's operations would have a consequent adverse impact on the local economy, contrary to the objectives of both the adopted Core Strategy and the emerging Local Plan, which encourage more economic growth.

Meridian Water – The Plan's Approach

The Plan is silent on the scale of growth in Meridian Water at present, as a consequence of the lack of an appropriate evidence base to demonstrate its capacity to receive more development. It does, however, refer to the nature of development supported, including a range of housing and commercial uses. IKEA welcome such uses where they do not have adverse impact on the business's operations.

Most specifically, LBE are promoting (through draft Policy E7 of the Local Plan) a Creative Enterprise Zone at Meridian Water as part of a policy to diversify away from the Borough's traditional warehouse, logistic and light industrial market. IKEA support the use of new and existing buildings in Meridian Water, for creative enterprises where they can be accommodated within the existing infrastructure.

The Plan supports '*meanwhile space to serve needs in early phases*' of large schemes, specifically citing Meridian Water. IKEA do not oppose meanwhile uses, so long as they do not compromise the Company's operations.

It is recognised at paragraph 7.3.3 that meanwhile uses can have adverse impacts noting that '*...large scale [meanwhile] uses may have a significant landtake, with subsequent impacts on amenity and transport networks...*'.

Meridian Water is identified at paragraph 7.4.6 of the Plan as being a new neighbourhood, where events space, restaurants and leisure activities will be encouraged. The scale of such uses has not been defined and should only be so, once the appropriate evidence on capacity (environmental/infrastructure/transportation) is available.

Meridian Water is identified within the hierarchy of town centres (Table 7.1) as a Large Local Centre ('LLC'). Whilst IKEA do not object to the designation of Meridian Water as a LLC, the geographical extent of the LLC is unclear from the draft Plan. It is, therefore, recommended that the boundary of the LLC should be clearly defined in the forthcoming Local Plan.

Retail Policies

The Plan promotes a town centre first approach to the development of new town centre uses, including retail. It, however, recognises that edge or out of centre development may be appropriate, to help meet to the Borough's town centre use needs over the Plan period (paragraph 7.1.8).

IKEA support the Plan's recognition of the potential benefits and appropriateness of development outside designated town centres.

Policy TC1 notes that all development proposals for town centre uses should be supported by an impact assessment, regardless of scale. Where there is no evidence suggesting an alternative approach, the NPPF (and NPPG) recognises that the default threshold for impact assessments is 2,500 sqm. IKEA request that the Policy is modified to recognise that small scale retail, including extensions, below 2,500 sqm do not warrant an impact assessment.

Furthermore, it should be clarified in the forthcoming Local Plan that any impact assessment is only necessary on any net uplift in retail floorspace, and should not apply to existing retail operations, where they are intensified, re-purposed or redeveloped.

It is stated at paragraph 2.8.1 that town centres, as well as other areas of high accessibility can reduce the reliance on private cars. Meridian Water, which is to be identified (in part) as a town centre, contains the IKEA store. IKEA's modus operandi is heavily reliant upon car-borne access, given the nature of their trading. IKEA would not support any policy that sought to reduce existing car parking provision, where it would have an adverse impact on their store operation. Therefore, any proposed reduction in car park provision at existing retail facilities should only be considered where there is no longer a need for the scale of existing car parking.

Paragraph 2.9.1 identifies the potential development capacity that can be achieved by intensifying the use on sites with existing buildings, including retail. It is important to recognise that whilst this may be appropriate in circumstances where land is currently being inefficiently used, such redevelopment/intensification should only be promoted in the Plan where it does not adversely impact existing businesses.

Other Policies

The following considers other specific policies and reasoned justification of the Plan, which require further clarification or amendment.

The approach to affordable housing is unclear and most notably in respect of the affordable housing targets that will be sought on developments. Policy H4 notes that there is a strategic borough-wide target of “40-50% two or more bedroomed dwellings”. However, it notes that the precise target will be based on up to date local needs evidence, which clearly may differ from that suggested in the Policy. It also notes at paragraph 5.5.2 that 50% of affordable rented and market housing should be at least three bedroomed, suitable for families. Presently, there is no clear policy on the target for affordable housing provision, and the Plan should be modified to make it more precise.

Paragraph 7.4.11 of the draft Plan notes that development should be managed, in terms of control on hours of operation, for example, to protect existing residential amenity. It is equally important that new development is controlled so that it does not impact on existing commercial operations. The Plan should be modified to recognise that commercial premises, given their importance to the local economy, should be protected from any inadvertent adverse impact of new development.

Section 10 of the Plan outlines the sustainable movement and transport strategy. In addition to the strategic public transport and major roads network, there is little information on the proposed strategic transport network for the Borough. The Plan needs to identify the strategic road improvements that are required, in order to achieve the growth aspirations of LBE. This can, however, only be determined once the transport modelling has been completed. This evidence has not yet been prepared. IKEA, therefore, reserve their position on this matter, until LBE’s evidence base is available.

Policy SUS2 seeks to minimise environmental impact of new development, both through construction and operational phases. It is noted that for commercial developments, LBE will seek a minimum BREEAM rating of “excellent” as required by the London Plan. It also requires “major developments” to be net zero carbon and any projected residual carbon emissions to be charged (in line with up to date GLAs suggested carbon off-set prices). IKEA do not object to the aspirations of the policy but note that such requirements should only be sought where they are both practicable and feasible as part of any project and, consequently, the Policy should recognise the need to understand a project’s viability and practicality to determine if these standards can be met.



Summary

In summary, IKEA support the prospective growth strategy of the Local Plan and support the current proposition of the Plan that the actual growth and its spatial location cannot be defined until an appropriate evidence base has been established. This is particularly important in the Meridian Water area, where IKEA do not oppose LBE's objectives to intensify development beyond the current Development Plan, but only where it can be demonstrated, through evidence on infrastructure and transport requirements, that the area is capable of accommodating more growth through existing or enhanced infrastructure (including transportation).

IKEA, therefore, reserve their position on the scale and location of growth in the emerging Local Plan, especially in Meridian Water, until LBE's evidence base is available.

Yours sincerely

Tim Waring
Director

cc. Insiyah Khushnood IKEA

Our ref: Q080620/tw/gl

Your ref:

Date: 28 February 2019



The Local Plan Team
Enfield Borough Council
Silver Street
London
EN1 3XA

By email

Dear Sirs

A New Local Plan for Enfield (2018 – 2036) ('The Plan')
Regulation 18 Consultation
Responses on behalf of Tottenham Hotspur Football Club ('THFC')

These representations are submitted on behalf of THFC, whose principal interest in the London Borough of Enfield ('LBE') is its state-of-the-art First Team and Academy training centre facilities situated on land south of Whitewebbs Lane and west of Bull's Cross. THFC also owns land immediately north of the Training Centre.

THFC's Economic, Social and Environmental Role in Enfield

The Training Centre principally comprises a central building, which accommodates the training, medical, welfare and administrative facilities surrounded by 14 grass football pitches and one and a half synthetic pitches. The Training Centre is sub-divided into the First Team operations and the Academy operations. The Training Centre opened for pre-season in 2012 and is now widely regarded as one of the best training facilities of its kind in the World.

THFC opened "The Lodge" in 2018, which is a self-contained, 45 bed facility abutting the Training Centre to the east, that incorporates further training, medical and welfare facilities. In addition to providing accommodation for injured players undergoing rehabilitation or new players assimilating into the Club environment, it is used by the First Team returning from European away games in the early hours. As elite training facilities, the Training Centre and the Lodge are occasionally used by visiting teams, including the England national team who have trained at the facility a number of times ahead of games at Wembley Stadium and the Brazilian national team who based their training camp for the 2018 World Cup at the Lodge. The Lodge is one of the very first BREEAM 'Outstanding' buildings in the borough of Enfield.

THFC has also recently received planning permission for the construction of an environmental centre and nature reserve on land to the west of the Training Centre. The facility will incorporate a full-size elite standard sports pitch and accompanying building that will provide two fully equipped classrooms and changing areas and a newly established nature reserve. Central to the use of the facility will be every one of Enfield's primary, secondary and special schools, which will each have the opportunity to use the facility once a year free of charge. The project has been developed in conjunction with the Council's education services and is expected to be open around the end of 2020.



The Training Centre and facilities associated with it, provide employment for 178 people directly (excluding playing staff) and there is a significant supply chain to the Training Centre that means that indirect employment locally is also significant.

Along with its economic role, THFC also plays an important social and environmental role in the Borough. Most notably at the Training Centre, where (in conjunction with its charitable Tottenham Hotspur Foundation), THFC continues to deliver its S.106 commitment of 70,000 community coaching hours.

THFC's social, economic and environmental impacts on the Borough are greater than just the Training Centre interest it has within the Borough itself, most notably in respect of its new stadium and campus (the "Northumberland Development Project") situated in North Tottenham, which is bringing significant socio-economic benefits to the boroughs of Enfield and Haringey.

The environment and its key role in the wellbeing of the local community, is at the heart of THFC's operations, especially at the Training Centre and this is clearly demonstrated with the focus on environmental sustainability, including a strong focus on biodiversity.

It is in this context that these representations are made.

Promoting 'Good Growth' in Enfield

The Plan is underpinned by a spatial strategy aimed at 'good growth' (as defined in the London Plan)¹ with an ambitious growth strategy, which aims to ensure that the positive benefits of growth, regeneration and investment reach all residents of the Borough.

In order to achieve the Borough's growth, a range of options have been put forward, focussing development in the following potential areas:

- Main town centres (and areas around all stations).
- Main transport corridors.
- Existing estate renewal and regeneration programmes.
- Eastern corridor and low-density industrial areas.
- Future Crossrail 2 growth corridor.

¹ Defined in the London Plan as 'working to rebalance development in London towards more genuinely affordable homes for working Londoners to buy and rent and it's about delivering a more socially integrated and sustainable City, where people have more of a say and growth brings the best out of existing places while providing new opportunities to communities...what we need is growth that allows us to build thousands of genuinely affordable homes at the same time as creating a more inclusive, greener and safer city that supports the health and wellbeing of all Londoners.'

- New Southgate and Upper Lee Valley 'Opportunity Areas'.
- Strategic plan led approach to Green Belt release.

The Plan notes each of the various options have differing strengths and weaknesses² and the Plan deliberately defers a decision on identifying a preferred development strategy until the outcome of the consultation of the Plan.

The Plan also recognises that it is not possible to determine the detail of the spatial strategy until appropriate evidence has been established and assessed³.

THFC supports the emerging Plan's approach to reserving the final decision on the most appropriate spatial planning approach once a sound evidence base has been established, thereby allowing sound decisions to be made.

In the absence of an appropriate and sound evidence base, THFC comments only at this stage on the broad options for achieving the Borough's growth.

Town Centres and Areas Around Stations

The growth options diagram⁴ identifies 13 town centres and areas around stations.

Whilst these represent sustainable locations, given their good levels of accessibility, the opportunities for intensification and redevelopment will differ in each location, given the varying characteristics of the centres and station environments.

Higher densities are not necessarily always viable and there are often constraints and complications on delivery in highly urbanised areas.

THFC supports this option, where it can be demonstrated that the environmental capacity and infrastructure of the area can accommodate greater intensification of development and use, and development is viable.

Transport Corridors

Key transport corridors for potential development focus are identified along the A10 (Great Cambridge Road) and A406 (North Circular Road). These corridors are identified as a potential option for growth, given the existing transport infrastructure.

² Paragraph 2.7.5 of the draft Plan.

³ Paragraph 1.8.6 of the draft Plan.

⁴ Figure 2.2 of the emerging Local Plan.

Whilst THFC does not object to this option, it is notable that parts of the corridors may not be accessible to public transport, or close to necessary community, social and commercial infrastructure. The environments may also be inhospitable to sensitive land uses, such as housing. THFC considers that the appropriateness of these corridors should be carefully appraised and only considered appropriate where they are accessible by all modes of transport, and close to the necessary social, community and commercial infrastructure.

The emerging Local Plan recognises the need to improve the east/west connections through the Borough, and most notably both the A110 and Whitewebbs Lane/Whitewebbs Road (adjacent to THFC's training ground). THFC supports the improvements to the east/west connectivity and especially that along Whitewebbs Lane, which provides a westwards connection from the A10 to the northern part of the Borough.

Estate Renewal/Regeneration Programme

The Plan (Figure 2.8) identifies four areas for estate renewal and regeneration. THFC supports these areas for renewal and regeneration, but notes that they each have a finite capacity for intensification.

Eastern Corridor and Industrial Areas

The eastern part of the Borough includes a large area with a traditional industrial legacy. The area demonstrates some of the highest levels of social deprivation and exclusion. THFC supports the intensification and repurposing in this area, subject to the existing economic base of the area not being undermined. Moreso, THFC notes that areas close to the eastern corridor provide for the social and economic wellbeing of those residents in the eastern corridor. THFC considers that the Plan should underpin development that supports the improvement to the wellbeing of those residents in the eastern part of the Borough. THFC's Training Centre is a good example of the importance of infrastructure/facilities that fall outside this corridor, but which make a substantial contribution to the wellbeing of those communities.

Green Belt Release

The emerging Local Plan notes that land within the Green Belt may provide the opportunities for accessible and sustainable options to help meet the Borough's growth needs. THFC notes that the Plan recognises the potential for Crews Hill Station to act as a hub for sustainable growth.

THFC supports growth at the Crews Hill Station, in principle, subject to evidence demonstrating that it can be accommodated without undue impact on the Green Belt functions. However, if it is to be identified for growth, upgrades to the east/west connections will be necessary, and THFC support such upgrades where they utilise and secure upgrades to existing infrastructure, most notably Whitewebbs Lane/Road.

The emerging Plan also recognises that Enfield's Green Belt is diverse, given the different types of uses undertaken within it. Uses have developed within Enfield's Green Belt that mean some sites no longer perform the five purposes⁵ of Green Belt.

⁵ As defined at paragraph 134 of the NPPF.

In the case where a site's function is no longer consistent with the five purposes of Green Belt, or where it can be proven that it is necessary to accommodate inappropriate development⁶, then THFC would support the removal of such sites from the Green Belt. Any such re-designation would, however, need to be supported by robust evidence demonstrating their appropriateness.

The Council will be carrying out a number of studies⁷ to inform the review of Green Belt boundaries, and it is this evidence that will define appropriate areas for Green Belt release and the exceptional circumstances in which Green Belt should be modified.

THFC's Training Centre and surrounding land is one such area of the Borough where Green Belt release may be appropriate given the nature (use, appearance and function) of the site. THFC wish to work with LBE (and their advisors) on the Green Belt review to determine whether it is appropriate to retain their land within the Green Belt. The Training Centre would remain within the Forty Hill Conservation Area.

Future Crossrail 2 Growth Corridor

There are potential, significant opportunities for accommodating growth through the Crossrail 2 route. However, if the Plan is to rely upon this option, it is necessary for certainty of delivery and timescales to be fully understood. An over-reliance on Crossrail 2 growth corridor, in the absence of no firm funding commitment, has the propensity to undermine the spatial strategy of the Plan, should such an opportunity be relied upon within the Plan.

THFC supports the exploration of opportunities for growth in the Crossrail 2 corridor, subject to the project's certainty and the incorporation of sufficient flexibility to effect a contingency.

Specific Policy Comments

THFC do not wish to comment specifically on the majority of policies within the Plan at this stage, albeit given its role and function within the Borough, THFC wishes to comment below on matters of health and wellbeing, as well as Enfield's 'green and blue spaces'.

Health and Wellbeing

Policy S12 of the Plan seeks to promote healthy lifestyles, in order to reduce health inequalities and create healthier neighbourhoods. This is proposed to be achieved through a number of criteria, including encouraging greater participation in physical activity. Given THFC's role in the Borough, and in particular its Training Centre, it is especially supportive of policies that encourage participation in physical activity through access to inclusive open space and sports facilities.

⁶ As defined in paragraph 145 of the NPPF.

⁷ Paragraph 2.12.4 of the emerging Local Plan.



Green and Blue Spaces

Policy GI1 seeks to promote active participation in active recreation and, again, THFC supports this approach.

Policy GI2 is concerned with the Green Belt and Metropolitan Open Land ('MOL') noting that Green Belt boundaries will be reviewed, to determine whether they are appropriate and still meet Green Belt purposes⁸, and to determine whether they need to be reviewed to ensure that LBE can plan positively for sustainable development.

THFC supports the Council's commitment to undertaking a Green Belt boundary review.

Summary

THFC supports LBE's growth ambitions in their emerging Local Plan and the need for the Plan to consider a range of options for delivering the growth. However, each option must be assessed against appropriate and proportionate evidence to determine whether they can accommodate growth in a sustainable manner, having regard to the environmental and infrastructure capacity within the Borough.

THFC wish to work with LBE in identifying opportunities within their existing interest to further the Borough's social, economic and environmental wellbeing whilst assisting in meeting the Borough's growth strategy.

Yours sincerely

Tim Waring
Director

cc. Richard Serra Tottenham Hotspur Football Club

28 February 2019



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Dear Sir/Madam,

**London Borough of Enfield's Proposed New Local Plan 2036 – Issues and Options
Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended)**

Land at Brimsdown

We welcome the opportunity to comment on the London Borough of Enfield's (LBE) Issues and Options consultation document (Regulation 18) on behalf of a consortium of landowners with land interests in the Brimsdown area (the parties).

For the reasons set out within this letter, we endorse the Council's Growth Option to include the Brimsdown area for substantial mixed use development. We consider that Brimsdown has the potential to create a new piece of city which will play a strategically important role in the delivery of new and improved industrial facilities, employment uses and new homes to help the LBE meet the relevant targets set out in the draft Local Plan.

The first part of this representation provides the relevant background information in relation to the Brimsdown area, before sequentially providing responses to the questions set out within the 'Have Your Say' consultation document and in relation to Brimsdown where relevant, followed by our observations that fall outside of the remit of the above referenced questions. Where we propose amendments to currently drafted policy text, this is shown in red.

We look forward to working with the Council to ensure that the plan can facilitate sustainable development, responds positively to the Government's agenda for growth and accords with tests of 'soundness' as set out within the National Planning Policy Framework (NPPF) (2018).

The Site

The wider Brimsdown area comprises a number of existing low rise industrial units and associated car parking and service yards. To the north of Brimsdown is Enfield Lock and the associated existing residential neighbourhoods. To the east is the King George Reservoir. To the south is the Ponders End Industrial Estate and to the west are further residential neighbourhoods.

The majority of the Brimsdown area is currently designated as Strategic Industrial Land (SIL) and is located within the Upper Lee Valley Opportunity Area. It is also relevant to note that Brimsdown Station is identified as benefitting from the anticipated Crossrail 2 line and 4 track improvements, connecting the area to central London via trains every five minutes.



The existing low density industrial estates do not make best use of available space. This is particularly relevant when considering Brimsdown's location within the context of the emerging Local Plan and its identified Growth Option Areas.

Representations to Regulation 18 Consultation

Questions 2 and 3: Key Priorities in the Draft New Local Plan 2036

Questions 2 and 3 ask:

'Are there any sites that you would like to see identified as a site capable of contributing towards Enfield's overall development needs?'

'Are you aware of any sites that are available and deliverable to make a major contribution to meeting needs and can come forward for development within the lifetime of this Plan?'

We consider that the intensification of development on well located previously developed sites should drive the borough's strategy for the promotion and management of growth. Land at Brimsdown clearly fits this objective and its allocation is consistent with Objective 1 of the draft Local Plan. We therefore support the Council's identification of Brimsdown as a key growth hub.

Objective 1 states:

Objective 1: Promoting and Managing Growth

To promote growth and help achieve sustainable patterns of development by focussing new development in...areas around all stations...the eastern corridor and low density industrial areas...

To enhance the quantity, quality and density of the borough's Strategic Industrial Location (SIL)...including the possibility for substitution and consolidation, to enable new and emerging businesses in sectors, whilst supporting opportunity for a mixture of uses and co-location.

In order to meet these objectives, paragraph 2.7.4 of the draft Local Plan identifies 'broad options' as to where the majority of new development could be accommodated. Those of relevance to this representation include:

- Areas around stations;
- Eastern corridor and low density industrial areas;
- Future Crossrail 2 Growth Corridor; and
- Upper Lee Valley Opportunity Areas.

The locations of the above Growth Options are illustrated in Figure 2.2 of the draft Local Plan and are reproduced below for reference:

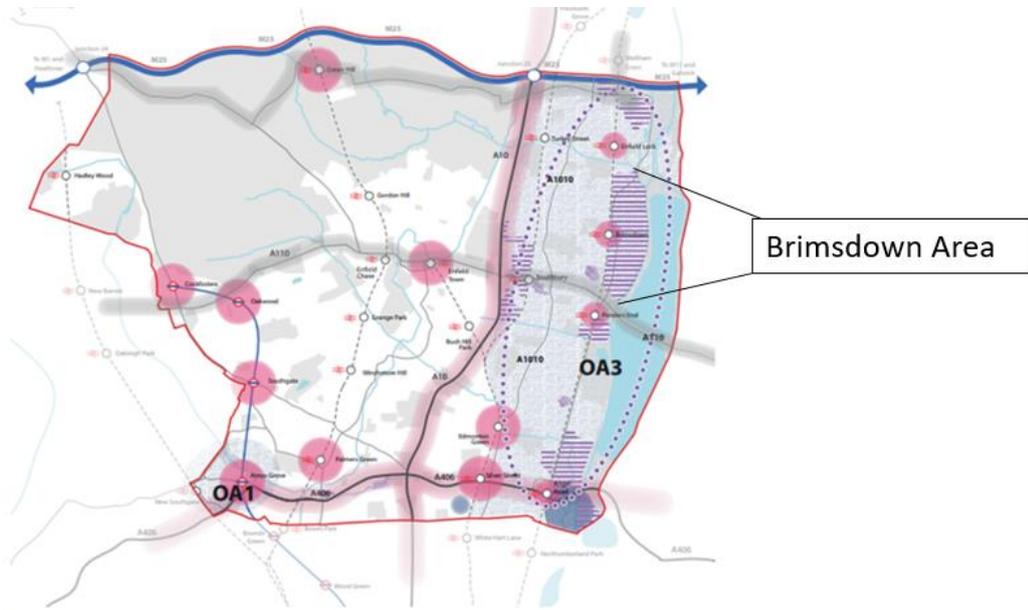


Figure 2.2: Enfield 2036 Growth Options Diagram

Key	
Enfield borough boundary	Town Centres and areas around stations
Railway	Movement corridors and linear gateways
Primary road	East west connectivity
National Rail station	Eastern Corridor
London Underground station	Strategic Industrial Location
Piccadilly line	Locally Significant Industrial Site
Open space	Estate renewal and regeneration programmes
Water body	Opportunity Areas (as identified in the draft new London Plan (2017))
	OA1 New Southgate
	OA3 Upper Lee Valley

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Figure 1: Draft Local Plan Growth Options Diagram

The draft Local Plan continues to provide an analysis of each of the above identified Growth Options across pages 39 to 54, which sets out the rationale for designating the areas as Growth Options and the benefits of doing so.

A summary of the each Growth Option's analysis is provided in Table 1 below.

Table 1: Relevant Growth Option Area Analysis

Growth Option	Summary of Analysis
Areas around stations	<ul style="list-style-type: none"> • National and London Plan Policy identifies areas with high levels of public transport accessibility as high priority areas for development, where higher densities are allowed or even required. • Areas with good access to transport nodes will have a significant role to play in meeting growth ambitions. • Also notes that employment uses are often accommodated in single storey structures and that with good design, most employment uses can be located alongside or below homes.
Eastern Corridor and Industrial Areas	<ul style="list-style-type: none"> • The eastern corridor accommodates a large concentration of businesses generally on older industrial sites in low densities. • The proximity of sites in the eastern corridor to the proposed Crossrail 2 infrastructure project means the Council will need to consider whether low density industrial areas are making the best use of land or whether there is a need to take a proactive approach to increasing their capacity, quality and density. • The draft new London Plan identifies the borough as a location where strategic demand for industrial uses is anticipated to be strongest. This requires intensified and additional floorspace in either existing or new locations. • Intensifying and exploring opportunities for mixed uses and co-location of SIL with high density employment and housing can help create sustainable communities. • Including industrial land as part of growth options provides the opportunity for greater variety in employment, housing and density. • A proactive approach towards industrial land has the potential to deliver a net increase in jobs and raise the quality of employment in the borough. Fully capturing the benefits of transport improvements in the eastern corridor may require a proactive approach to land assembly, SIL substitution through relocation, consolidation, intensification and optimising efficiency through design. • To ensure that any mixed use proposals do not result in a net loss of employment floorspace nor undermine operations, this type of development will need to be holistic and plan led.
Future Crossrail 2 Growth Corridors	<ul style="list-style-type: none"> • The potential of this strategic infrastructure project will help to unlock and accelerate delivery of new development sites which will in turn deliver much needed new homes, jobs and economic growth. • The arrival of Crossrail 2 will create value and act as a catalyst for further new homes and jobs in the Crossrail 2 corridor and surrounding areas. • Crossrail 2 in Enfield would support the delivery of a significant number of new homes and jobs beyond the plan period alongside a dynamic and flexible approach to Enfield's industrial land along the eastern corridor. • The 40,000 new homes target required to make Crossrail 2 a reality cannot be met without the strategic reconfiguration of land within the eastern corridor. Much of this land is SIL and in a Crossrail 2 scenario, SIL will need to work more efficiently and flexibly in terms of land uses in order to drive forward housing and economic growth. • Fully capturing the benefits of Crossrail 2 would require strategic review of land uses and a strategy of relocating and consolidating uses and optimising new homes and jobs across the borough.
Upper Lee Valley Opportunity Area	<ul style="list-style-type: none"> • Upper Lee Valley already represents one of London's major growth corridors. • With the anticipated confirmation of Crossrail 2 there is an urgency to bring forward an early refresh of the current Upper Lee Valley Opportunity Area Planning Framework (OAPF) to re-examine the benefits brought by phased rail infrastructure in the Easter Corridor.

	<ul style="list-style-type: none"> The updated OAPF should look to reconfigure, relocate, consolidate, intensify and optimise the efficiency of SIL making it work harder through efficient uses and intensification policies.
--	---

Brimsdown is located within all four of the overlapping identified Growth Option areas. On the basis of the above analysis and objectives of the identified Growth Options, it is apparent therefore that Brimsdown is located within a strategically important location that would allow the delivery of a significant number of new homes, improved industrial facilities and new jobs, in compliance with the requirements of the emerging Local Plan. The reasons for this are as follow.

1. Firstly, Brimsdown is located adjacent to Brimsdown Train Station. Areas around existing stations are promoted as Growth Option areas. The existing rail infrastructure provides accessibility from the Brimsdown area into central London and north to Cambridge.
2. Brimsdown also includes land that is located within the Eastern Corridor SIL, which comprises existing low density industrial development. As detailed in Table 1, a key ambition of the emerging Local Plan is to identify existing low density industrial land and consider the potential to intensify its use and to increase land use efficiency through consolidation and substitution of uses. Brimsdown therefore displays the fundamental pre-requisite characteristics of the type of industrial sites that the emerging Local Plan is seeking to redevelop for mixed use.
3. Brimsdown is also located adjacent to the planned Crossrail 2 route through Brimsdown Station. It is noted that the draft Local Plan seeks to deliver 40,000 new homes as part of the Crossrail 2 scheme and it is considered that the Brimsdown area has the capacity to make a significant contribution towards this target through a masterplan or plan led approach.
4. Finally, Brimsdown is also located within the Upper Lee Valley Opportunity Area, where consideration of SIL, intensification and efficiency measures is promoted by the emerging Local Plan, particularly in relation to the anticipated confirmation of Crossrail 2.

The wider Brimsdown area benefits from being located within all 4 of the identified Growth Option areas and does not solely rely on any single one. Brimsdown is therefore suitable for mixed use re-development in both a Crossrail 2 and no-Crossrail 2 scenario.

Question 5: Design Excellence

Question 5 asks:

‘To meet what will be challenging growth needs for homes, business and infrastructure, do you think Enfield’s Local Plan should include options to:

- *Set out where more tall buildings (i.e. over eight storeys) could be appropriately supported in the borough to minimise land take? yes/no*
- *Promote higher densities in lower rise buildings...*
- *Inform height and density in line with the character of the local area? Yes/no’;*

We support the Council in its objective to identify areas where tall buildings would be appropriate. We also support the aim of draft Policy D2 in seeking to ensure that more tall buildings and higher density development is realised in appropriate places.

With regard to defining the perceived appropriate height for development in a given area, it is first necessary to refer to London Plan Policy 3.7 ‘Large Residential Developments’, which states that sites of over 5ha or capable of accommodating more than 500 dwellings should be progressed through an appropriately plan-led process to encourage higher densities.

Furthermore supporting paragraph 3.42 of the London Plan adds that large new developments are planned to make a significant contribution to meeting housing need, and their scale means they have particular potential to define their own characteristics and accommodate higher density development.

It is also relevant to note that restricting height and tall building development to accord with its surrounding character alone would be inconsistent with the draft emerging New London Plan Policy D8. Draft Policy D8 states that in identifying locations on maps in Development Plans for tall buildings, borough's should take account of not only visual impacts, but also the potential contribution to new homes, economic growth, regeneration and public transport connectivity

We consider that where a large new development could be accommodated of scale to establish a new piece of city, this should be afforded the opportunity to set its own character in its own right. Such forms of high density development should not be restricted to prescribed height parameters that are informed by existing neighbouring developments.

Therefore, in response to Question 5 and in order to ensure that the quantum of homes and jobs envisaged by the draft Local Plan can be delivered in the previously identified Growth Option areas and specifically at Brimsdown, we consider that the Council should not inform height and density in line with the character of the local area. Indeed, we consider that the emerging Local Plan should identify sites in the eastern corridor and other Growth Areas as being suitable for tall buildings and high density development.

In doing so, this will ensure that a significant number of homes and jobs can be delivered in this location.

Questions 6: Meeting Enfield's Housing Needs

Question 6 states:

'Should the Council continue to have a policy that seeks a set percentage of affordable homes, such as 40 or 50% that can be evidenced and supported by identified local need, or rely on the emerging London Plan's policy of a minimum of 35% affordable housing, with higher percentages only if there is grant available.'

We fully acknowledge the role which affordable housing plays in the delivery of a varied housing offer. In response to the above question, we consider that the emerging Local Plan should be consistent with the requirements of the emerging New London Plan and the threshold approach to viability.

In order to accurately reflect the emerging London Plan position in relation to affordable housing provision, we would suggest the following text amendments, which acknowledges that such provision is subject to viability:

'The Council will seek the maximum deliverable amount of affordable housing on development sites and from all other sources of supply (subject to viability). We have set a strategic target that 50% additional housing delivered across the borough between 2018-2036 will be affordable, having regard to the evidence of the emerging local housing need assessment, as well as the Local Plan Viability Assessment (in the absence of regular updates to this document, the Council will defer to any relevant and up to date site specific viability assessments) and factors such as the availability of any applicable public subsidies, the site context and character of the surrounding area and design related issues.'

We would also suggest that the policy is updated to reflect the latest wording of emerging New London Plan, which states that industrial land appropriate for residential use will deliver at least 50% affordable housing only where there is a net loss of industrial capacity and in line with the threshold approach to viability.

Question 6 also asks (in summary):

In relation to affordable housing tenures, should Enfield:

- *Stick to its current mix for affordable housing of 70% social/affordable rent and 30% intermediate;*
- *Deliver whatever mix of affordable housing need is identified through housing needs evidence subject to viability*
- *Secure more social rent even if this results in a lower overall percentage of affordable homes being delivered*
- *Increase the share of intermediate products being delivered, which would likely result in a greater range of affordable tenures being delivered overall.*

We note that the current wording of emerging draft Enfield Local Plan Policy H2 seeks at least 30% of affordable housing delivery to be social rent and London rent; 30% intermediate affordable housing product including London Living Rent and Shared Ownership and the remaining 40% to be determined by the Council.

In response to the above question, we consider that the current wording of draft Policy H2 is consistent with the London Plan and the threshold approach to viability and as such we support this. However, we suggest that clarity is provided within the policy as to whether the above percentages concern provision measured by habitable room or units.

Furthermore, we also suggest clarity is provided with regard to what tenure the Council would require as part of the 40% that is subject to their discretion.

Further to the above clarifications, we also consider that it is necessary to update the wording of draft Policy H2 to provide flexibility in relation to the required tenure mix and site specific viability. Indeed, we consider that the policy should recognise that in some instances, site specific viability will dictate that only a bespoke and specific affordable housing mix will be viable and will represent the only means of delivering a development scheme due to viability.

Question 10: Promoting a Competitive Economy

Question 10 states:

'On land protected for industrial uses in Enfield, which sites would benefit most from intensification for employment and/or mixed use?'

For the reasons set out in our response to Questions 2 and 3, we consider that low density SIL, that is located within the Eastern Corridor, or in proximity to the proposed Crossrail 2 route, or within the Opportunity Area, would represent a site which would benefit most from intensification for mixed use development.

In order to ensure that such sites come forward as part of an appropriate intensification of use through mixed use redevelopment, we make the following observations and proposed amendments where necessary to the preceding and supporting text to draft Policy E2 'Approach to Employment Land', before providing commentary on the wording of the draft policy itself.

Supporting Text Regarding Substitution and Consolidation

We are supportive of the Council's position with regard to the potential for substitution and consolidation of the appropriate areas of SIL within the borough. In particular, we are in agreement with paragraph 6.2.14, which states that such reconfigurations would ensure a diverse economic profile and help the borough deliver the maximum number of new homes and jobs.

In this regard we would suggest that the draft Local Plan is more specific, and identify the broad areas within which substitution and consolidation could be achieved in the same way that paragraph 6.2.17 identifies broad areas within which intensification of SIL could be achieved (where we note that Brimsdown is also listed).

Supporting Text Regarding Intensification

We are also supportive of the Council's position in relation to the potential for intensification of Brimsdown as detailed in paragraphs 6.2.16 – 6.2.18.

Notwithstanding our general support, the current wording of paragraph 6.2.16 does not suggest that intensification of industrial uses could be co-located alongside a mix of other uses including residential. The draft Local Plan makes it clear that co-location of industrial and residential uses will be required in order to meet the Plan's ambitious growth targets and therefore we suggest the following amendment to paragraph 6.2.16:

'Intensification of industrial land could occur in several ways, such as: increasing building footprints within sites and plots, use of vacant land, and; changing the form or typology of buildings to provide more workspace. Intensification could also be achieved through consolidation of industrial uses on underutilised and inefficient sites as part of mixed use developments. This is considered further below.'

Supporting Text Regarding Mixed Use

The potential to deliver new, efficient and high specification industrial units as part of mixed use development is identified across paragraphs 6.2.19 – 6.2.20, and we welcome this. However, we note that paragraph 6.2.20 details a number of examples where this can be achieved, but fails to identify Brimsdown. It is our position that for the reasons set out at the beginning of this letter, that Brimsdown is suitable for mixed use redevelopment.

On this basis, we suggest the following amendment to paragraph 6.2.20:

'Whilst our portfolio of sites is well-functioning and the impetus for mixed-use development may not exist, opportunities may exist ~~in the south east~~ over time through planned regeneration at sites already close to stations, for example, at and around Brimsdown station and the wider Brimsdown area and, Edmonton Leaside, such as Harbet Road and the non-designated Argon Road industrial Estates which lie close to Angel Road station...'

Draft Policy E2 'Approach to Employment Land'

Further to the above identified amendments to the supporting text to draft Policy E2, we are in broad agreement with the wording of draft Policy E2 and we support the objective of protecting and enhancing SIL in the borough. However we consider that at present, the draft wording of Policy E2 does not make sufficient provision to allow for co-location of land uses.

On this basis we suggest the following amendments:

'The Council will seek to achieve more efficient use of employment land to support economic growth sectors and a higher jobs density both through the retention of the most suitable locations and with the managed release of land that is/or becomes surplus to requirements for such uses over the plan period. The Council will also seek the efficient use of employment land through the delivery of mixed use developments which co-locate with existing industrial uses in suitable locations through a masterplan or plan led process.'

We will achieve this by:

- a) Achieving more efficient use of employment land to support *the delivery of* economic growth sectors and wider growth needs through the retention of suitable locations and capacity, intensification with no net loss of functionality, *mixed use developments including housing where appropriate*, and limited, plan-led managed release of land.

...

- c) *Protecting and directing industrial activity to the boroughs Strategic Industrial Locations (SIL) and Locally Significant Industrial Sites (LSIS) as identified in Figure 6.3 for protection, managed intensification and as suitable in principle for use classes B1(b), B1(c), B2, B8 appropriate sui generis employment uses including waste, utilities and transport depots, with other supporting facilities including B1(a) uses where ancillary in scale and function. Proposals falling outside the above uses will be resisted, unless forming part of a masterplan or plan-led approach to mixed use redevelopment on appropriate sites in the eastern corridor*

...

- f) *Proactively supporting substitution and consolidation either on site or within the borough to new location(s) that are accessible to the strategic road network where such locations are able to demonstrate...*

Draft Policy E2 also contains requirements with regard to developments proposing the intensification of employment land. Whilst this is welcomed, we consider that the current wording does not sufficiently capture the potential to intensify employment land use through co-location and mixed use redevelopment. Instead, the current wording appears to only reflect the intensification of industrial uses. We therefore suggest that this section of the policy is updated to include the following text:

'Intensification

[insert following text after Intensification sub heading] Intensification of industrial land will be supported either through the consolidation and introduction of additional employment floorspace or, through the mixed use redevelopment of identified sites through a plan-led approach, in which the development results in no net loss of employment floorspace and co-location with other suitable uses, including residential.

Proposals involving intensification will be expected to demonstrate:

- *Genuine intensification that maintains or increases capacity of the relevant SIL of LSIS land use; and*
- *There is no net loss of functionality, including ability to meet evidenced local and appropriate strategic industrial and warehousing demand.'*

Question 15: Sustainable Movement and Transport

Question 15 asks:

'Do you support the strategic transport infrastructure proposals for Crossrail 2, road network capacity improvements and east-west rapid transit connectivity? Please explain why and what the Local Plan should do to support the proposals'

We are supportive of the proposed strategic transport infrastructure proposals and the means by which such projects could act as additional infrastructure support for further large scale redevelopment projects and investment, particularly within the Eastern Corridor.

Notwithstanding the above, we consider that there is already existing sufficient transport infrastructure and capacity to support redevelopment projects in this area. The emerging Local Plan should therefore allow for early phased development in the Brimsdown area in the short term.

Questions 18: Local Plan Impacts

Question 18 asks:

'Are there any other areas in which the Plan could be strengthened to ensure that future development better serves the needs of all of Enfield's residents and address inequalities'

The remainder of this letter sets out our response to the above question by providing commentary on the currently drafted policies within the emerging Local Plan that fall outside of the remit of the questions contained within the Have Your Say consultation document.

Draft Policy D3 'Design for Co-Location and Mixed Use Development'

We are generally in agreement with the wording of draft Policy D3, and welcome the Council's overall aspiration to promote mixed use development and co-location of different uses in SIL. We are also supportive of the Council's requirement to ensure that development proposals make the most efficient use of land possible.

Notwithstanding the above, at present we consider that the wording of draft Policy D3 does not sufficiently and explicitly state that the Council will expect the consolidation of SIL to ensure efficient and mixed use land. The draft policy is instead currently worded such that it focuses primarily on retail and town centre development.

Given the emerging Local Plan's stated strategic objectives and the aims of the identified Growth Option areas, we consider that it is necessary to amend the wording of draft Policy D3 as follows:

'We will expect development proposals to:

To make the most efficient use of land, especially development proposing the consolidation and co-location of uses on SIL within the designated locations as part of a masterplan or plan led process, new retail development and developments near town centres and transport hubs, taking into account the character and infrastructure capacity of the area.

All development that does not fulfil this objective will be refused. In the case of proposed masterplan or plan led SIL re-development or retail, co-location with residential, social infrastructure, office space or other appropriate development will usually be required to achieve this subject to environmental and amenity considerations.

We consider that the above proposed wording will ensure that any forthcoming development proposals within the Growth Option areas will make the most efficient use of land, thereby maximising the delivery of new homes and jobs, through either a masterplan or plan led process.

Draft Policy H1 'Housing Growth and Quality'

We welcome the Council's commitment to achieving the identified needs of existing and future households by seeking to deliver at least 1,876 homes per year in the plan period between 2018-2036 and, by seeking to increase this growth where new infrastructure investment creates opportunities to do so.

In order to ensure that draft Policy H1 supports the delivery of the maximum number of homes reasonably possible, we propose the following amendments to the current wording:

We will achieve this by:

...

- c. *Prioritising delivery of new homes around the emerging growth and investment areas identified in Chapter 2 of this Plan.*

We will expect development proposals to:

- d. *Make the most efficient possible use of land by promoting higher density development in **the identified Growth Areas** or in suitable, accessible locations, taking into account local character and existing and planned infrastructure capacity.*

...

- g. *Support the masterplan or plan led redevelopment of identified SIL through the consolidation or substitution of existing operations, to create new mixed use communities.*

The above proposed amendments would ensure that the Growth Areas are the primary focus for the delivery of housing, along with ensuring that the plan is deliverable through the designation of relevant sites.

Conclusion

Brimsdown predominantly comprises existing low density industrial development located within four Growth Option areas as detailed within the emerging Local Plan.

Owing to its position within the above four Growth Option areas, we consider that the Brimsdown area has significant potential to deliver a strategic redevelopment proposal comprising a mixture of uses.

Thank you for giving us the opportunity to comment on the emerging draft Local Plan (Regulation 18). We would be grateful for confirmation of receipt of these representations and look forward to some suggested dates to meet.

Please do not hesitate to contact us on the details at the head of this letter should you require any further information.

Yours faithfully,

Savills

PD11890/WE/SS/EJD

28 February 2019

Strategic Planning and Design Team
Enfield Council
PO Box 53
Civic Centre
Enfield
NE1 3XE

Sent via email to:
localplan@enfield.gov.uk

Corresponding call for sites form submitted

Dear Sir / Madam,

**ENFIELD COUNCIL, A NEW LOCAL PLAN FOR ENFIELD (2018-2036) REGULATION 18 CONSULTATION
REPRESENTATIONS ON BEHALF OF STONEGATE HOMES LTD**

These representations are submitted by Montagu Evans LLP on behalf of Stonegate Homes Ltd, in respect of the New Local Plan for Enfield Council Regulation 18 consultation.

The Draft New Local Plan (Regulation 18) document sets out the emerging policies for growth and change within the Borough up until 2036. Following previous public consultation in 2015, this Issues and Options consultation is seeking views on the strategy for development and change in Enfield including possible future housing and other development sites, and development management policies that will guide future development.

It is understood that representations received will help inform the publication version (Regulation 19) of the Plan that will be consulted on and then submitted for Examination in 2020. Formal adoption of the Plan is anticipated for 2021.

Background and context to these representations

By way of background to these representations, Stonegate Homes Ltd have an interest in the land which is the subject to a live planning application, referred to as the "Ripmax Site" on 241 Green Street" (Figure 1). The site comprises an area of 0.46 hectares and is located to the south-west of Brimsdown Rail Station and is bound by residential buildings to the north, south and west, and a railway line to the east.

The Site comprises two large warehouse-type buildings (Use Class B8), comprising of approximately 3318 sqm (NIA) of Use Class B8 space with ancillary office space for the administration side of the business. The site also comprises associated surface car parking, which provide capacity for approximately 30 vehicles. Due to the operational needs of the business, the Site no longer suits Ripmax's operational requirements and they are currently looking to relocate within the Borough.

The Site is located within the Upper Lee Valley Opportunity Area and has no other adopted policy designations. The site is not specifically allocated for development at this stage in either the adopted or emerging Local Plan.

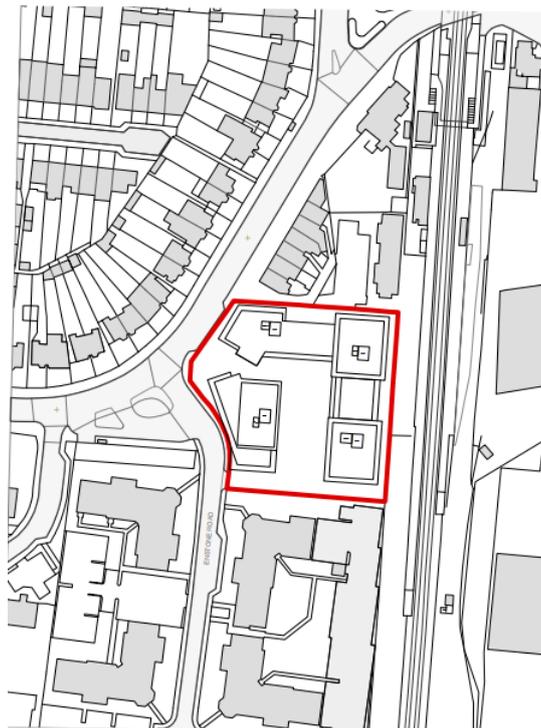


Figure 1: Ripmax Site Location Plan

In December 2018, Montagu Evans submitted an application on behalf of Stonegate Homes Ltd for full planning permission for development of the site (ref. 18/04935/FUL). The application seeks consent for:

“Redevelopment of site involving demolition of existing buildings and erection of 175 self-contained units (comprising 53 x 1 bed, 104 x 2 bed and 18 x 3 bed) with flexible mixed use on the ground floor (A1, A2, A3, B1 D1) within 2 blocks comprising (Block A, B and D up to 10 storey's and Block C up to 7 storey's) together with undercroft parking and associated landscaping and parking.”

The Applicant has undertaken consultation with officers at London Borough of Enfield (LBE) and the Greater London Authority (GLA) and has also engaged with local councillors, local residents and other key stakeholders, prior to the submission of the application.

Call for Sites and Response to the Draft Local Plan

The Council notes that the draft plan sets out options for development over the next 15 years through 'good growth' principles, as endorsed by the Mayor of London. The Council notes that the key challenges to address are:

- Ensuring there is enough housing to meet everyone's needs;
- Creating better employment opportunities and promoting economic growth;
- Reviewing infrastructure and community facilities;
- The future role of our town centres;
- Creating places that promote health and wellbeing; and
- Ensuring development is high quality and protects the environment.

Our client supports the acknowledgement of the principles and in particular the optimisation of low density industrial to boost economic growth and the commitment to deliver sufficient new housing to meet identified needs.

More specifically, our client supports the additional opportunities afforded in emerging Policy to:

- Direct investment and growth the town centres and areas around stations, especially those located within Crossrail 2 Growth Corridor and Opportunity Areas (Paragraphs 2.8.3, 2.13.1 and 2.13.4);
- Exploit the opportunities around transport corridors, including addressing severance and congestion caused by level crossings in North east Enfield (Paragraph 2.14.2); and
- Proactively manage and optimise low density industrial.

Housing Needs

The Council are clearly committed to increasing housing delivery, as Paragraph 2.1.4 of the Draft Local Plan notes the current targets from a regional and national level. The Draft Local Plan outlines that the draft London Plan (2017) proposes Enfield to deliver 1,876 additional dwellings each year between April 2019 and March 2029 which equates to 18,760 homes over the next 10 years. Moreover, the government's objectively assessed need for housing in the borough is 3,500 dwellings each year, equating to 35,000 for the same period. However, the reality is that Enfield has only delivered on average approximately 550 dwellings a year since the adoption of the Core Strategy in 2010. The Draft New Local Plan emphasises that given past delivery rates of new homes, the Council will have to plan for more housing, in order to deliver more. As part of the adoption of the New Local Plan, it is noted that the Council will undertake further needs assessment which will be reflected in future iterations of the emerging Local Plan to be consistent with the NPPF.

The Draft Local Plan in Policy H1 (Draft Policy Approach: Housing growth and quality) seeks to deliver the maximum amount of growth possible in order to meet the minimum housing target of 1,876 dwellings a year from 2018 to 2036.

Although subject to review, draft Policy H1 represents the minimum regional target, which although takes a positive approach to the allocation of sustainable sites, falls significantly below the level of housing need identified using the government's objectively assessed need level of 35,000 homes over the next 10 years. In addition, the latest Housing Delivery Test Results (2019) notes that Enfield Council scored 85% on the Housing Delivery Test and are in "Action Plan" mode, which requires the Council to address the reasons for the shortfall. On this basis, the minimum housing target reflected in draft Policy H1 should be revised to reflect the identified housing need once established, likely to be reflective of the government's target.

The Council notes that the identified housing need will only be achieved through looking at new ways of building homes, new sources of housing land and new areas of the borough not previously considered for homes, as noted in paragraph 2.1.7. In addition, the Council acknowledge in Paragraph 2.4.1 that all reasonable opportunities on brownfield land need to be exhausted, making underused land work harder and optimising densities.

The NPPF states that applications should be considered in the context of sustainable development and that where there are no relevant development plan policies, or the policies which are most important to determining the application are out-of-date, permission should be granted. This includes applications involving the provision of housing and situations where the local planning authority cannot demonstrate a five year supply of deliverable housing sites (with the appropriate buffer, as set out in Paragraph 73 of the NPPF). Whilst the latest Annual Monitoring Report (2015-2016) demonstrates the Council's ability to meet a 5 year land housing supply plus a 5% buffer, this relied heavily on the delivery of larger sites which are yet to come forward. With the new London Plan Housing Targets, it is questionable whether the Council remain able to demonstrate a 5 year housing supply.

A separate Call for Sites form is submitted in tandem to this representation for the Ripmax Site seeking the allocation of the site in the emerging Local Plan for mixed use, housing led development as reflected in application reference 18/04935/FUL. The Ripmax Site once approved, will contribute to the future delivery of

housing in the Borough. As such, its delivery and ability to maximise the site's capacity, whilst taking into consideration the site's constraints and surrounding context is key to housing delivery on this brown field site. The development will deliver circa 175 new homes, and therefore will make a significant contribution to the borough's housing need. Redevelopment of the Site including residential use is in line with the objectives of the NPPF, which encourages the effective use of land, particularly previously developed land. It will also deliver housing within the opportunity area which is consistent with the GLA's spatial strategy in a highly sustainable location.

Paragraph 123 of the NPPF encourages the optimisation of land to meet as much of the identified need for housing as possible. This should include the use of minimum density standards for city and town centres and other locations that are well served by public transport. These standards should seek a significant uplift in the average density of residential development within these areas, unless it can be shown that there are strong reasons why this would be inappropriate. This is reflected in draft Policy D2 (Draft Policy Approach: Character and density) of the Draft Local Plan, which states that more tall buildings and higher density development should be promoted in appropriate places in the borough. This approach is supported, however, it should be noted that appropriate places include opportunity areas, town centres or near public transport hubs which should achieve higher densities.

In addition, our client supports draft Policy D3 (Draft policy approach: Design for co-location and mixed use development) which enshrines the 'Agent of Change' principle in the London Plan, co-locating residential development with other uses to make the most efficient possible use of land near town centres and transport hubs.

Employment Floorspace

Draft Policy E2 (Draft Policy Approach: Approach to employment land) seeks to achieve more efficient use of employment land, and manage the release of land that is/or becomes surplus to requirements for such uses over the plan period. Our client supports this policy approach, however further clarification within this policy is required as the plan develops in relation to the non-designated employment sites within this policy. The Ripmax Site is highlighted as a non-designated employment site (Figure 6.4), and although the draft policy seeks the retention and protection of Strategic Industrial Locations (SIL) and Locally Significant Industrial Sites (LSIS) and provides criteria for the consolidation/introduction of different uses within these designations, we suggest the following is incorporated into draft policy E2 or a separate policy created:

Making Effective Use of Urban Land

The Council will optimise the potential for the redevelopment of non-designated employment sites where it can be demonstrated that the site is no longer suitable for existing employment uses and/or the redevelopment is part of wider regeneration benefits.

The existing policy does not make clear the ability for suitable sites that are non-designated employment sites to come forward preferably those that perform poorly in employment terms. This revision to the draft approach, would assist in ensuring that the Local Plan accords with the tests of soundness set out in paragraph 35 of the NPPF (2019) once developed further in later drafts:

- Positively prepared: The policy would ensure that the Plan is based on a strategy which meets the objectively assessed development requirements by ensuring that suitable opportunities for making the most effective use of urban land are explored and brought forward for consideration.
- Justified: Without this change, sustainable, underutilised brownfield sites that are in employment use could be sterilised from delivering mixed use schemes. Given the Borough's Green Belt and SIL constraints, this would not be the most appropriate strategy for meeting economic and housing priorities.

- Consistent with national policy: Not only does national policy seeks to boost significantly the delivery of housing and deliver job growth in a sustainable locations, it actively encourages the promotion of mixed use developments to deliver multiple benefits from the use of land in urban areas.

The Ripmax Site (ref. 18/04935/FUL) is an example of a non-designated employment site which is no longer suitable for the existing user and proposes employment uses that are of a more suitable nature whilst integrating uses that complement the surroundings. The development will reprovide new, better quality, fit-for-purpose flexible floorspace as new employment opportunities at similar or greater job density levels. This representation demonstrates that emerging planning policy should support such brownfield redevelopment opportunities to ensure the efficient utilisation of employment land and proactively look at alternative uses for land which is currently developed but not allocated to meet identified development need whilst not undermining key economic sectors or sites.

Summary and Closing

It is clear that the Ripmax Site represents a specific, reliable and developable site, offering a realistic prospect for the delivery of housing and employment opportunities within the next five years. The site presents a major opportunity for the Council to address their housing delivery shortfall and impeding housing targets and it should be given precedent in seeking to maximise the site's capacity in the sustainable location adjacent to the railway. Redevelopment of the Site including residential use is in line with the objectives of the NPPF, which encourages the effective use of land, particularly the redevelopment of previously developed land. It will also deliver housing which is a priority at all tiers of the policy framework directing residential development to the most sustainable locations.

There is acknowledged need also so employment uses. Industrial needs can be better met elsewhere and by releasing the site for mixed use development, its potential can be optimised including increased employment level.

For the reasons outlined above we consider that the site should be allocated for mixed use development as presented in application reference 18/04935/FUL for the development of 175 residential dwellings, together with the creation of 556sq.m flexible commercial space (Use Classes A1, A2, A3, B1 and D1). The Ripmax Site fully captures the regeneration opportunities unlocked by significant transport investment, especially where these would help us to exceed homes and jobs targets or deliver the homes and jobs more quickly.

Stonegate Homes Ltd intend to continue to engage with the Council throughout preparation of the new Local Plan and we therefore request that we are kept informed of any updates going forward. We would like to have the right to participate at any oral examination if necessary.

Please do contact Will Edmonds, Sam Stackhouse or Elizabeth Dewsbury at this office if you have any queries or if you would like to discuss further.

Yours faithfully,

**WILL EDMONDS
PARTNER
MONTAGU EVANS LLP**



*Tesco Stores Limited
Shire Park
Welwyn Garden City
Hertfordshire
AL7 1GA*

London Borough of Enfield
Planning Policy
Silver Street
London
EN1 3XA

26th February 2019

Dear Sir

Enfield Local Plan Issues and Options (Req 18) Document - Representations by Tesco Stores Ltd

Tesco has aspirations to redevelop their store at Glover Drive, Upper Edmonton, N18 3HF, and open up the area for residential development. The store falls within the London Plan Lea Valley Opportunity Area and within the Meridian Water Masterplan (Adopted 2013). This provides for the mixed use redevelopment of the site. Overall the wider area is set to provide 10,000 new homes, and 6,700 new jobs along with a new relocated Angel Road/Meridian Water station, and other transport improvements.

The Council published the Edmonton Leaside Area Action Plan (ELAAP) in 2017 which sets out the vision for the regeneration of the Meridian Water Opportunity Area and the specific policies and allocations through which the vision shall be delivered. Tesco submitted detailed representations to this through our planning consultants GLHearn in April 2017, and these remain relevant until adopted.

When adopted the ELAAP together with the New Enfield Local Plan will form part of the Borough's Development Plan and will outline the Council's vision and objectives for the continued regeneration of the borough; and in particular the important role that the regeneration of the Meridian Water Opportunity Area will perform in meeting the Council's vision and objectives. We welcome the preparation of the above Plan and the Council's vision for the regeneration of the Borough.

We welcome the Council's aspirations in Chapter 2 to direct new development opportunities back to town centres to help them thrive. We also welcome the council's vision to intensify development around key over ground stations, and for Cross Rail to stimulate regeneration and deliver new homes and jobs; and promoting development above single storey retail, supermarkets and the redevelopment of underutilised and low density land such as surface car parks.

We support in particular Policy D2 Character and Density a) in relation to the recognition of tall buildings contributing towards the regeneration and growth agenda. We also support Policy D3 Design for co-location and mixed use development and the expectation that development proposals make the most efficient use of land, especially new retail development, and the recognition of the most efficient possible use of land near town centres near transport hubs.

We also support Policy E2 Approach to employment land, which seeks to achieve more efficient use of employment land to support economic growth sectors. Tesco is an important existing employer providing c. 500 full and part time employment opportunities in the area at present. We are keen to maintain our existing operations, with opportunities to increase employment through the



redevelopment of the existing Extra store increasing employment opportunities and employment growth within the wider area.

In November 2017, since the publication of the ELAAP the Mayor of London published a new Draft London Plan. Most notably this includes a significantly increased housing target for the London Borough of Enfield of 1,876 new homes per annum compared to only 798 homes per annum contained in the adopted London Plan.

This is recognised in the New Local Plan and Policy H1 Housing growth and quality, which seeks to deliver at least 1,876 homes within the Plan period, which is welcomed. Given the New Enfield Local Plan is following the framework established by the emerging London Plan, we consider the Meridian Water Masterplan could be more ambitious with an opportunity to increase height and density within the area given the increase in housing numbers now promoted.

Also in view of the age of the document (2013) and the emerging development and planning policy context set out in the emerging Plan we consider that there is in- principle support for increased massing and density in the Meridian Water Area given the increased housing targets.

We are keen to engage with the Council as our development aspirations emerge going forward and we would be grateful if we can be notified about publication of further stages of the Plan as it progresses.

Yours faithfully

***Louise Ford MRTPI, Dip TP
Town Planning Manager
Tesco Stores Ltd***



Date: 31 January 2019

Our Ref: LC/JW/Enfield/Sites 2018

Your Ref:

London Borough of Enfield
Planning Department
Civic Centre
Silver Street
Enfield
EN1 3XA

Transport for London
Commercial Development
(Property Development)

3rd Floor, Wing Over Station
55 Broadway
London
SW1H 0BD

Dear Sir/Madam,

RE: Enfield Draft New Local Plan 2036 Issues and Options Consultation: Transport for London Commercial Development Response.

Thank you for the opportunity to comment on the new Local Plan 2036 issues and options consultation.

TfL is a significant land owner in the borough. Please note that our responses below represent the views of the Transport for London Commercial Development (TfL CD) in its capacity as a significant landowner in the borough only, and do not form part of the TfL corporate response. Our colleagues in TfL Spatial Planning will provide a separate response to this consultation, in respect of TfL-wide operational and land-use planning / transport policy matters as part of their statutory duties.

TfL CD works to identify development opportunities throughout our landholdings. We work to unlock underutilised land through pursuing innovative solutions to enable development on our sites. We are committed to providing exemplary development that will show case the Mayor's objectives of providing good growth. TfL CD has identified a number of sites in the borough for residential led development which will make a significant contribution towards meeting borough housing targets, as well as improved public transport infrastructure.

Our representations with respect to the various topics in the consultation are set out below. Please refer to our separate responses with respect to your Call for Sites and Draft Heritage Strategy Consultations.

2.0 Promoting Good Growth Options in Enfield

2.8 Town Centres and areas around stations

It is welcome that the Draft Local plan recognises that the areas surrounding underground and rail stations “*have the potential to bring forward new homes, through a combination of higher densities and infill opportunities*”. TfL has substantial land holdings in the borough which are adjacent to railway stations and infrastructure and have the potential to deliver a significant amount of new homes. These sites include station car parks (including at Cockfosters and Arnos Grove). TfL CD support the approach of focussing growth at town centres and railway stations. This is in line with draft London Plan policy GG2 which sets out that development of underground and railway stations should be prioritised. A full list of TfL owned sites in the borough which have high accessibility to railway stations and are potentially suitable for residential development can be found in the response to the ‘Call for Sites’ consultation that runs along side this Local Plan Consultation.

2.9 Transport Corridors

It is welcome that the Local Plan identifies that “*Land that is currently being used inefficiently by single storey industrial, commercial and retail buildings and surface level car parking should be promoted for intensification and comprehensive redevelopment*”. There are opportunities in the borough to redevelop underutilised surface level car parking adjacent to underground stations which have high levels of public transport accessibility. This is inline Draft London Plan policy D6 which promotes residential development in accessible locations.

TfL CD notes the new annual requirement will be 1,876 as a minimum, and possibly up to 3,500. A step-change in the approach to housing delivery is needed, including the use of underutilised land adjacent to transport corridors.

2.12 Strategic plan-led approach to Green Belt

TfL is proposing to bring forward development at Cockfosters station car park which is adjacent to the Green Belt. TfL CD agrees that development in or adjacent to the Green Belt should be “*assessed to ensure that it did not have an unacceptable visual impact on the surrounding countryside.*” We suggest that the policy could go further to support development opportunities in accessible locations adjacent to Green Belt, identifying that density on such sites can be optimised but must not have an unacceptable visual impact upon the openness of the Green Belt.

TfL CD agrees that the Green Belt should be maintained, but for a housing delivery strategy to be effective, the Local Plan should place more emphasis on development and increased densities in the main town centres and around stations and transport corridors. Indeed the New Local Plan at para 2.4.1 states that a first principle is to exhaust “all reasonable opportunities on brownfield land, making underused land work harder and optimising densities”.

Given the capability of Cockfosters station car park to deliver a sustainable development, its lack of constraints, and its accessible location, TfL CD consider that the site should be specifically marked as site that can deliver growth.

3.0 Enhancing Heritage

HE1 Draft policy approach: Design Quality and Local Character

TfL CD support the objectives of the policy and recognise that conserving and enhancing heritage assets will be a necessity in bringing forward appropriate development on the Cockfosters and Arnos Grove station car parks and other development sites in TfL ownership within the borough.

Development at Cockfosters and Arnos Grove will provide the opportunity to make a positive contribution to the borough’s regeneration, character and future architectural heritage while preserving and enhancing listed station buildings and the Trent Park Conservation area in relation to Cockfosters. Development design will be based on a clear understanding on how the unique character of the relevant heritage assets can be conserved and enhanced.

HE2 Draft policy approach: Designated heritage assets, their setting and archaeology

TfL CD supports the objectives of this policy. Any development on TfL landholdings which will affect heritage assets will be supported with relevant supporting documents and evidence, including a heritage statement, which will set out how the design will conserve and enhance the heritage value of the assets rather than diminishing it.

This policy is particularly relevant to development at the car parks of Arnos Grove and Cockfosters stations. TfL will work collaboratively with the borough and Historic England to ensure that the development design is informed by supporting evidence to conserve and enhance the heritage value of the heritage assets at these sites.

HE4 Draft policy approach: Views

TfL CD agrees with the aims of this policy. Where proposed development on TfL landholdings will impact upon important local views TfL CD will work with the borough to identified verified views and assess the impact of proposed development on these views. Proposed development on all TfL land holdings in the borough will assess key views that may be affected.

4.0 Design Excellence

D2 Draft policy approach: Character and density

It is welcome that the local plan recognises that higher density development and tall buildings will be a suitable form of development in appropriate locations including in areas with high public transport accessibility. The majority of TfL land holdings in the borough have high levels of accessibility due to their close proximity to underground stations and town centres (please see the TfL response to the Call for Sites consultation which runs alongside this consultation for more information on our landholdings in the borough). We believe that the majority of these sites are suitable for higher density development which takes into account the character and context surrounding areas.

The development of tall buildings on TfL landholdings may be appropriate in areas where existing tall buildings form part of the surrounding context such as Town Centres (including Cockfosters). TfL CD will work with the borough to ensure that the design of any proposed tall buildings on TfL land are of the highest quality and that the design of development responds suitably to the context of the area.

5.0 Meeting Enfield Housing Needs

H1 Draft policy approach: Housing growth and quality

The Draft Local Plan identifies that Enfield need to deliver *at least 1,876 homes per year in the plan period between 2018-2036*. TfL landholdings in the borough (set out in our response to the Call for Sites consultation) have the potential to make a significant contribution to meeting these housing targets and TfL CD will continue working with Enfield to ensure appropriate levels of development on these sites.

It is welcome that the policy recognises that the borough will “*make the most efficient possible use of land by promoting higher density development in suitable, accessible locations*”. This is in line with draft London Plan Policy GG2 which prioritises

development on public sector land and at accessible town centre locations. This is also in line with draft London Plan Policy H1 which sets out that housing delivery should be optimised on sites with PTAL levels of 3-6 or within 800m of a Tube station. The majority of TfL landholdings in the borough are at accessible locations adjacent on in close proximity to stations and are suitable for optimising residential development in line with this policy.

The London Plan monitoring reports confirm that net housing delivery between 2014/15 and 2016/17 has totalled 1,980 homes. This equates to just 35% of the Draft London Plan minimum target for 3 years (5,628 homes). Policy H1 should therefore recognise that in order to achieve the step change in housing delivery required 'local character' may need to change in appropriate locations. .

TfL CD plans to bring forward the development of a range of different housing products on sites within the borough. This includes the delivery of build to rent housing and a significant amount of affordable housing. TfL will work with Enfield to ensure that the housing mix on proposed developments responds to housing need in the borough enabling a mix of high quality family sized and smaller sized dwellings to be developed.

H2 Draft policy approach: Affordable housing

It is welcome that Enfield's draft affordable housing policy is in line with draft London Plan Policies H5 and H6. TfL CD support the borough's overall strategic target of providing 50% additional housing as affordable and the adoption of the Mayor's 35% affordable housing fast track approach. TfL CD will comply with Mayoral Policy regarding the delivery of affordable housing on our potential development sites in the borough.

It should also be noted that Draft London Plan policy H5 identifies that Public Sector land owners should deliver *at least 50 per cent affordable housing across their portfolios* Draft London Plan Policy H6 sets out that where there is an agreement with the Mayor to deliver at least 50% affordable housing across a portfolio of sites, the 35% threshold should apply to individual sites.. A Mayoral direction sets out that TfL will deliver at least 50% affordable housing across its portfolio of landholdings in London.

H4 Draft policy approach: Housing mix

Proposed developments on TfL landholdings will provide a mix of units in line with borough policy. It is welcome that the draft policy approach allows for an element of flexibility in the mix of homes provided on individual sites, stating that "*the mix of*

market homes will be informed by individual development site characteristics, identified local housing need assessment, and the need to deliver mixed and balanced communities” We will work closely with the borough to ensure that proposed development on TfL provides a suitable range of housing sizes to meet local needs.

H5 Draft policy approach: Build to Rent Housing

TfL CD support the overall approach to Build to Rent as set out in the draft policy. This is in line with the guidance and requirements set out in draft London Plan Policy H13.

Private renting is the only growing tenure in the UK and whilst affordability constraints are responsible for a considerable proportion of this demand, many tenants are choosing to rent for longer periods than historically, allowing them flexibility longer term. It is therefore paramount that we effectively and not prohibitively encourage delivery of, and investment in, this tenure.

Build to Rent and the merits thereof have been well documented, and TfL CD are committed to the delivery of long term investment into this location and others across London. They will be delivering high-quality homes, bespoke designed for the rental sector and a considerable proportion of these as Discounted Market Rent, allowing them to own and manage the units in house. In this way they will ensure a commitment to local people but that those on lower incomes will benefit from longer tenancies, quality accommodation, services and amenity space in what will be a wholly inclusive environment, rather than one where the affordable units are clearly delineated and tenants left as bystanders.

This approach has been welcomed and effectively implemented across London and we would now like to work with Enfield to ensure the delivery thriving Build to Rent communities for the long term.

TfL supports the draft Enfield Policy which is aligned with that set out in the Draft London Plan and the Mayor’s Homes for Londoners SPG. It should be noted that the Mayor’s Homes for Londoners SPG sets out that flexibility on some design standards including number of homes per core and the number of single aspect homes can be allowed for Build to Rent schemes, due to the value of on site management and purpose built design in dealing with some of the challenges that would otherwise arise in build for sale schemes.

6.0 Promoting a competitive economy

E2 Draft Policy Approach to employment land

TfL supports the approach set out maintaining land suitable for employment set out in the policy. TfL CD supports mixed use intensification and co-location in line with draft London Plan Policy EC7. In accordance with the draft London Plan, any intensification or consolidation would need to be undertaken as part of a borough wide, plan led or master planned approach. TfL has substantial railway depot sites in Enfield and we are exploring the opportunity to bring these depots forward for development or potentially intensifying and co-locating or consolidating the uses with residential development and other uses. Again, we would look forwards to working with the borough to explore undertaking this as part of a borough wide plan led or master planned approach. Please also note that TfL depot land is exempt from the 'no net loss' principle as set out in policy E4 of the draft London Plan which states that *'The principle of no net loss of floorspace capacity does not apply to sites previously used for utilities infrastructure or land for transport functions which are no longer required.'*

7.0 Town Centres

TC1 Draft policy Approach: Town Centres

TfL CD supports the objectives of this Policy. This is in line with draft London Plan Policy SD8 which proposes that development proposals should take a town centre first approach by identifying centres that have a particular scope to accommodate new commercial developments and high density housing. TfL has landholdings in the borough that are in or adjacent to designated town centres (particularly in the case of landholdings at Cockfosters and Arnos Grove). In line with the policy, development on TfL landholdings in or adjacent to the identified town centres in the borough will support the continuing vitality and viability of the centres by providing residential development in appropriate and accessible locations along with appropriate smaller elements of commercial and retail uses.

TC2 Draft Policy Approach: Successful Town Centres

TfL CD supports the overall approach of this policy which aims to ensure that the boroughs town centres are the focus of growth. This will help minimise the need to travel by car which is a key focus of the MTS. The policy approach, advocating for a range of uses in the town centres including residential development is supported by TfL CD. This is in line with NPPF paragraph 18 which states that planning policies should recognise that residential development often plays an important role in ensuring the vitality of town centres.

TfL CD supports the overall approach to redeveloping car parks as proposed by the policy. This is in line with draft London Plan Policy SD8 which sets out that boroughs should identify sites suitable for higher density mixed use intensification, including the comprehensive redevelopment of surface car parks. The redevelopment of surface car parks in accessible locations will meet the objectives of good growth by facilitating the better use of underutilised sites, discouraging car use and focusing high density development in appropriate locations.

TfL CD suggests that the policy is more assertive with regards to 'surplus' car parks, and the requirement to demonstrate no demand for such car parks that are to be redeveloped. It is likely that there will be instances where there may be some demand for parking, based upon entrenched behaviour patterns, the low cost of parking and the ease of doing so. In such instances the loss of car parking spaces would easily be accommodated by the use of public transport and walking/cycling. It should also be taken into account that the users of many TfL station car parks drive from outside the borough and add nothing to the vitality of the local areas.

A more progressive approach, removing the requirement to demonstrate no demand for car parks would enable the best delivery of good growth. It would also be in line with draft London Plan Policy T6, which states that where sites are to be redeveloped, existing parking provision should be reduced to reflect the current approach and not be provided at previous levels where this exceeds the standards.

9.0 Enfield's Green and Blue Spaces

GII Draft policy approach: Enfield's Green and Blue Spaces.

TfL CD agrees with the approach of protecting Green and Blue Spaces in the borough. It is welcome that the policy states that all Open Space and Play Space in the borough which is designated on the policies map should be protected. The policy approach goes on to state that *"Any development proposals on such space should: be supportive of and ancillary to the purpose of that open space; and enhance the quality or accessibility of the open space"*. Part of the TfL proposed development site at the Cockfosters station car park is designated as open space within the policies map. TfL CD will ensure that improved publicly accessible open space is re-provided within proposed development of the scheme.

A London Loop public footpath which provides access to Trent Park open space is currently accessed through Cockfosters station car park. This path is currently poor

quality and unpaved. There is an opportunity to improve this footpath and enhance accessibility to the Trent Park open space as part of the development of Cockfosters station car park in line with the draft policy approach.

G12 Draft policy approach: Green Belt and Metropolitan Open Land

The TfL CD car park at Cockfosters station is adjacent to the Green Belt, but not within it. Any development at this site would be considerate of the impact upon the openness of the Green Belt in accordance with the NPPF and the London Plan. As part of any future development there is an opportunity to facilitate public access to the Green Belt (Trent Park) by improving the London Loop public access route to the North of the Site.

10.0 Sustainable Movement and Transport

T1 Draft policy approach: Making the public transport more accessible and the natural choice for longer trips

It is welcome that development is expected to “*Ensure that access and interchange improvements to local rail and tube station is considered where appropriate, including through appropriate design*”. TfL CD supports this objective and development on our land holdings will ensure that there are improvements to existing stations where appropriate.

T2 Draft policy approach: Reducing the impact of private vehicles on our streets

It is welcome that this policy will aim to support behavioural change regarding car use by ensuring that the borough *adopts maximum car parking standards* for development *promoting car-lite housing wherever feasible*. This is in line with draft London Plan Policy T6 and mode share objectives set out in the Mayors Transport Strategy. The policy could go further to support car free development in accessible and appropriate locations, particularly in close proximity to railway and underground stations. Built to Rent development in accessible locations may be particularly suitable as car free development and this could be recognised in the draft policy approach.

The policy could further identify that the borough can work with developers to negate the potential negative impacts of car free development by methods such as providing new Controlled Parking Zones in areas where potential car-free development can be delivered.

Concluding Remarks

We trust that we have provided sufficient information for the Council to be able to consider our representations in respect of the draft New Local Plan consultation. However, if you require any additional information, please do not hesitate to contact me or my colleague.

Yours faithfully

Jonathan Woolmer
Principal Planner, Commercial Development

Cc:
Patricia Cazes-Potgeiter, Planning Development Manager, Commercial Development



Strategic Planning and Design
Enfield Council
FREEPOST
MW5036
EN1 3BR

28th February 2019

Dear Sir/Madam,

Enfield – Towards a New Local Plan 2036 – Issues and Options

Simply planning Limited (SPL) is instructed by our client, View Point Estates to submit the following comments to the Issues and Options Local Plan. View Point Estates is a landowner in Southgate and we have been discussing the regeneration of Southgate Office Village with officers for over two years.

These representations see to support the principles of a draft Local Plan that makes underused land work harder and housing densities to be optimised. We do however request that the emerging local plan is more explicit regarding areas for growth. The new local plan should identify the most highly sustainable locations such as areas surrounding town centres and transport nodes and be explicit and realistic about the need for tall buildings to meet the housing need.

Q3

Southgate office village, identified in the attached plan, should be specifically identified as a site suitable for delivering a major contribution to meeting housing needs and which could come forward within the lifetime of the local plan and deliver c190 new homes together with new employment floorspace. The site should be identified as suitable for tall buildings subject to high quality design and other environmental considerations.

Q4

We support the recognition that heritage is dynamic and evolving. Heritage issues are an important consideration to be weighed in the balance against the need for new homes and jobs. The significance of the heritage asset and the identified harm need to be balanced. Conservation must embrace change where the impact to heritage assets can be outweighed by the benefits of development.

A particular consideration for the local plan is heritage assets within town centres and nodes of transport. The Local Plan should seek to identify key areas for conservation and those key areas that are proposed for growth and change.

Proposed policy HE2 b) states that “great weight will be given to the asset’s conservation”. The policy should include an assessment of the asset’s significance first. Not all heritage assets require “great weight”.

Proposed policy HE4 is supported in principle, but it is not necessary to protect all views and the Local Plan should identify the local Views that are to be protected in line with the London Plan.

Q5

The section on design excellence places an emphasis on character. Whilst character is important, the local plan should be explicit that some areas need to grow and change to meet the required housing and jobs numbers. Whilst some town centres may currently have a suburban character, these areas will need to grow and change.



This should be recognised within the Local Plan.

Emerging policy D2 supports tall buildings in appropriate places. The Local Plan needs to go further in identifying where the appropriate locations may be, and recognising that by definition, being taller than their surroundings, tall buildings may appear out of context.

The character of the area is not necessarily defined by the height and density of the existing buildings. Town centres and transport hubs and characteristic of growth and sustainable mixed use developments where high buildings should be located. The emerging Plan should be more explicit about character areas, identifying town and district centres as areas where the most growth / change should be directed.

Q6

One of the key aims for the Local Plan is to ensure housing delivery. One of the main issues with rising prices in the housing market is restrictions on delivery and supply. Delivery of homes relies on ensuring that delivery is viable. Q6 a) is misleading as it suggests that GLA policy requires a minimum of 35% affordable housing. This is not correct.

The London Plan approach is that applicants that provide 35% affordable housing within specified tenure mix as part of the application benefit from a "fast track" approach and do not require supporting viability information. The London Plan also recognises that there may be reasons why 35% is not viable, but applications proposing less than 35% need to be supported by viability assessments and undertake staged viability reviews.

Whilst Enfield should acknowledge identified levels of need, affordable housing policy should be based on realism of delivery which means understanding viability.

We therefore support the proposed policy H2 and the application of 35% fast track. The policy should be explicit that schemes providing less affordable housing may be acceptable where viability assessments demonstrate that it is not viable to deliver more.

Q6 c) with regard to tenures, we would recommend that the Local Plan allows for a flexible approach to ensure that the most appropriate tenure, or mix of tenures and the maximum viable amount of affordable housing is achieved on each individual site. We object to proposed policy H2 c) which should also state "unless agreed as an exception due to viability or site location".

We object to Policy H3 as it is not in conformity with the NPPF and national policy that states that affordable housing should not be sought on sites of less than 10 units. This is also not in conformity with draft Policy H2 c) which sets a 10 unit threshold.

Q10

We support the proposals for new office space. The policy should recognise that all town and edge of town locations may be suitable for office development.

Yours faithfully,

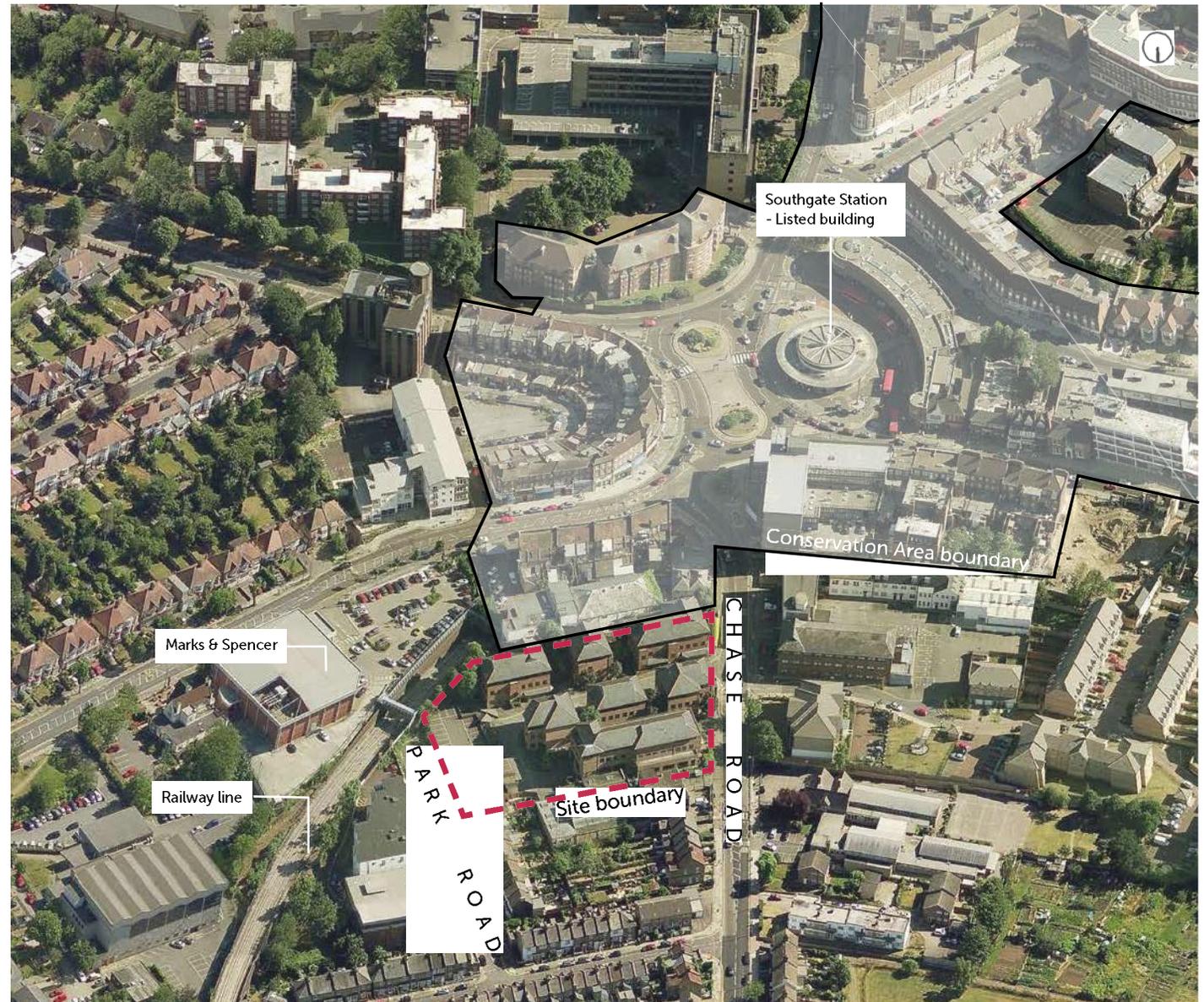
Holly Mitchell

Director

Enc.

Introduction to the site

- > The site is bounded to the west by Chase Road, to the east by Park Road and to the south-east by a railway line
- > The existing site consists of seven three-storey office blocks and a two-storey car park
- > The office blocks share a monotonous simplistic architectural language that includes large aluminium framed windows, brown bricks and grey-tiled pitched roofs
- > The site is constrained by a steep slope along Chase Road. Additionally, there is a four metre change in level between the western edge of the site along Chase Road and the eastern edge along Park Road



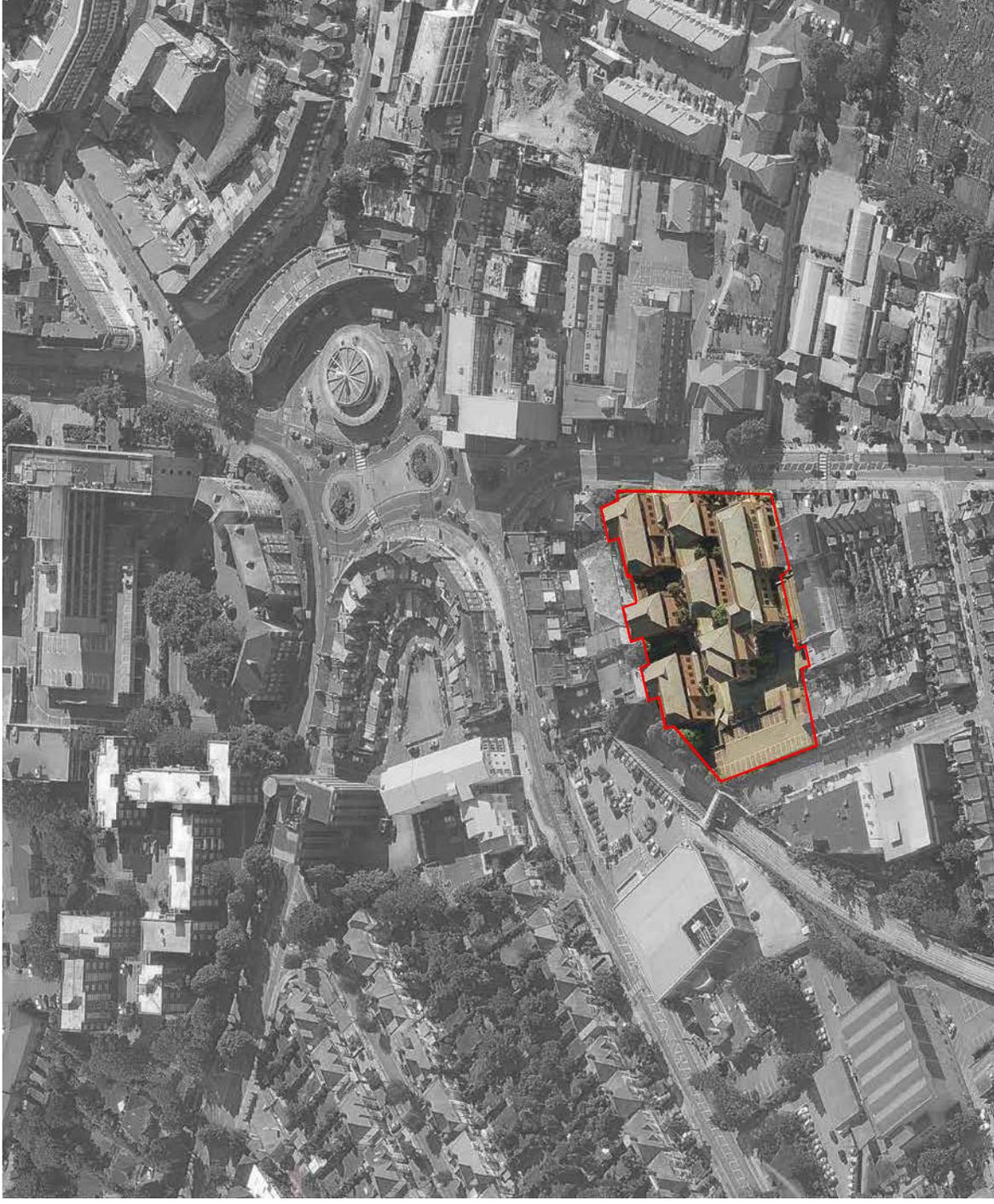
Key

 Site boundary

 Conservation Area boundary

Planning history and context

- > Existing site - Circa 4,730 sqm of office floorspace, in 7 x three storey office blocks and a two storey car park with 140 car parking spaces
- > Mar. 2017 - Prior Approval for 74 units with retained parking
- > May 2015 - Additional 8 units over existing open car park



Aerial view of the existing site showing the wider context

Public amenities & land uses

- > The area has good accessibility of public transport, underground and buses - PTAL 4
- > Town centre developed with commercial uses around transport hub
- > Office buildings at the edge of commercial and residential
- > Good opportunity for mixed use development



Key

	Site boundary
	Residential
	Retail
	Education
	Leisure
	Office
	Services

Wider Regeneration Introduction

- > The location of the site, within easy walking distance of the town centre and Underground station, makes the site acceptable in principle for high density mixed use
- > There is a significant need for new housing in LB Enfield and the new London Plan increases Enfield's annual housing target from 798 to 1,876. The Borough currently delivers approximately 550 new homes per annum. A step change in housing delivery in the right locations is needed in the Borough



Key

- Listed Buildings
- Developable Sites
- Current Site