

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

25th June 2019

Dear Sir/Madam,

Representations to the Edmonton Leaside Area Action Plan (ELAAP) (Main Modifications)

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 *Edmonton Leaside Area Action Plan (Main Modifications Draft)* (hereafter: Draft ELAAP).

Henry Boot have entered into a Joint Venture with LB Enfield to deliver the regeneration of Montagu Industrial Estate (a large industrial estate located to the south of the borough in close proximity to Meridian Water and the North Circular (A406)) to deliver new and improved B1, B2 and B8 floorspace. 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.

Representations

The purpose of the Draft ELAAP is to guide future housing, economic and infrastructure growth in Edmonton Leaside up to 2032. It should be in general conformity with national policy contained in the National Planning Policy Framework (2019), supporting Guidance Notes and Circulars, 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) and borough-wide planning policies (Core Strategy (2010), Development Management Document (2014) and the emerging Local Plan (which is currently at the Issues and Options stage).

Vision and Objectives

The vision and objectives of the ELAAP remain largely unchanged from the *Proposed Submission ELAAP* which was submitted to the Secretary of State for independent examination on 26th April 2018. The Draft ELAAP seeks to promote a thriving community of residents and businesses, enhance business and economic growth, and support a greater diversity of new jobs.

Revised Policies Map

As part of the Main Modifications consultation, minor amendments have been made to the Proposed Submission Policies Map.

It is noted that the Locally Significant Industrial Site (LSIS) boundary to the south of the Montagu Industrial Estate has been slightly amended, with the LSIS boundary now extended southwards to encompass the pedestrian and cycle path accessed off Montagu Road.

This amendment is supported by our client, who welcomes the opportunity to make more efficient use of this land to provide much needed employment space and/or infrastructure with the Council and to facilitate the wider redevelopment of the Industrial Estate.

Policy EL1 (Housing in Meridian Water)

Policy EL1 seeks to ensure that a suitable amount of housing (and affordable housing) is delivered at Meridian Water. Within the Main Modifications Draft, supporting text that encourages the de-designation of Strategic Industrial Locations (SIL) to increase the overall quantum of development achievable for housing units, has been deleted. Therefore, it is understood that the Council no longer seek to de-designate SIL or pursue higher housing numbers at Meridian Water.

As per our representations to the Local Plan (Issues and Options) (submitted 28th February 2019), it should be noted that residential uses are not suitable for many industrial sites, and should only be sought on LSIS with a good level of public transport accessibility, and in areas with complementary surrounding uses. Whilst Policy EL1 relates specifically to Meridian Water, it should be reiterated that existing industrial locations such as Montagu Industrial Estate are not considered suitable for residential units, without compromising their actual functionality. As such, the Council is encouraged to consider residential 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’.

Our client supports the notion of retaining and safeguarding both Strategic Industrial Locations (SIL) and Locally Significant Industrial Sites (LSIS) in Edmonton Leaside for future employment use, and therefore the strengthening of this cluster of industrial and employment-generating uses in the local area resulting in an increase in B1/B2/B8 floorspace, economic growth and the creation of an environment whereby (local) businesses can thrive.

Policy EL15 (Improving Existing Industrial Areas)

Policy EL15 supports opportunities for the intensification of employment uses and encourages developers to make more efficient use of land. Relating specifically to Montagu Industrial Estate, Policy EL15 supports the:

“regeneration at Montagu Estate to improve outdated infrastructure and to provide new buildings that will meet modern business needs, potentially through a joint venture partnership between the Council and private developer interests” [our emphasis].

Our client welcomes the Council's aspirations to modernise and improve Montagu Industrial Estate. The sentiment of which closely aligns with Henry Boot's ambition to redevelop the Site, in partnership with the Council, to provide a more efficient and fit-for-purpose industrial estate. Specifically, our client supports the fact that LB Enfield acknowledge and appreciate that the existing Site could be made more efficient and commercially attractive; meeting businesses' needs of the 21st century, which in turn, would help to increase (local) employment opportunities and contribute to the regeneration of Edmonton Leaside.

Policy EL15 states that at Montagu Industrial Estate, *“new buildings should meet the latest regulations, which set minimum energy efficiency standards for commercial property”*. Our client is generally supportive of the ELAAP's ambitions, but reminds the Council that the policy wording should be reflective of the commercial realities associated with employment-led regeneration projects. Whilst all new buildings are required to accord with latest building regulations, relying on too onerous energy efficiency standards (especially for smaller units) may undermine their delivery. The draft policy should be flexible enough to determine the minimum energy efficiency standards for a proposed development on a case-by-case basis rather than being too prescriptive from the outset.

Summary

Having reviewed the Draft ELAAP (Main Modifications), our client remains supportive of the emerging policies and LB Enfield's growth aspirations for Edmonton Leaside. Our client particularly supports the continuing promotion of Montagu Industrial Estate as a Strategic Industrial Location (SIL), and the increasing emphasis on supporting opportunities for the intensification of employment uses to improve efficiency, innovation and productivity in the borough.

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 Area Action Plan.

Yours sincerely



Nick Diment
Planning Director
Nick.Diment@glhearn.com