

Mr Ken Bean
NCAAP Programme Officer
London Borough of Enfield
Civic Centre – B Block South
Silver Street
Enfield
EN1 3XA

Our Ref: MB/7999

21st October 2013

Dear Mr Bean

NORTH CIRCULAR AREA ACTION PLAN – EXAMINATION

I write further to submission of representations on behalf of New Ladderswood LLP on the North Circular Area Action Plan (NCAAP) Submission Draft in May 2013 and in advance of the forthcoming Examination in Public. In this regard, please find enclosed a completed Pro-Forma confirming that we would like the opportunity to appear at the examination in order to make our representations orally to the Inspector. Also enclosed for reference are:

- A copy of our last Submission Version representations dated 22nd May 2013;
- A draft Ladderswood Masterplan, incorporating the New Southgate Industrial Estate

It is requested that a copy of this letter and attachments (particularly the masterplan which has not previously been submitted) is provided to the Inspector in advance of the hearings.

It is noted that notwithstanding our previous representations, the Submission Version of the NCAAP retains the Locally Significant Industrial Site designation. The representations previously made and case set out therein regarding the suitability of this designation at this location remain. The NCAAP still:

- Fails to have due regard to the Council's own resolution to grant planning permission for the redevelopment of the Ladderswood Estate (which is also a commitment within the New Southgate Masterplan). This also applies to the content of draft Policy 13;
- Fails to deliver the wider regeneration opportunities that the site offers in accordance with the New Southgate Masterplan;
- Is not consistent with the Council's resolution regarding the Ladderswood planning application, which included part of the same industrial estate for residential-led mixed-use redevelopment;
- Fails to have regard to the Council's own Employment Land Review (ELR) which concludes that the New Southgate Industrial Estate *"As an employment site the area is probably now too small and lacks profile to have a long term future. For example, there is very limited visibility from the North Circular"* (ELR 2012, Para 7.21);

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- In light of the ELR, is inconsistent with Core Policy 15.

Our previous representations included a proposed new NCAAP Policy 13a to specifically address the remaining New Southgate Industrial Site and setting out five key directives for any future development there. As the enclosed masterplan shows, a residential-led mixed use development of the site, as recommended for approval on the adjacent Ladderswood Estate and remaining New Southgate Industrial Estate, would deliver a high quality development with new public realm and landscaping, well designed and sustainable buildings, modern, bespoke commercial space and new homes in a sustainable location. It would also allow the site to positively address the North Circular, enhancing its setting and environmental quality.

In short, a development including all of the New Southgate Industrial Estate would deliver a far better integrated development that better meets the New Southgate place-shaping priority and a development far more befitting of this important gateway location. If left in isolation, whether redeveloped for commercial uses or not (if viable), the site will never be capable of delivering development that makes a meaningful or significant contribution to the wider regeneration of the area and will reinforce the doubts raised over the site in the ELR. Although development of the nature promoted would likely yield a net reduction in area this will deliver enhanced quality of provision and must be considered in the wider context of sustainable development as set out in the NPPF and development plan.

The ELR states that *"if the Masterplan is implemented, and new office space provided adjacent or near to the Alexander Place site there maybe merit in retaining the LSIS allocation and extending it to cover the new employment area"* (Para 7.21). In identifying the doubts about the site's long term future as already referred to, the ELR therefore clearly states that there *may* be merit in retaining the LSIS designation *if* office development is delivered adjacent to or near it. The plans for the Ladderswood Estate (incorporating the remainder of the New Southgate Industrial Estate) do not include any office provision and thus it follows that there is no merit in retaining the LSIS in accordance with the Council's own ELR.

Furthermore, it is relevant to note that the site currently comprises vacant offices (which could potentially be converted to residential use in any event as Permitted Development under the recently introduced changes), a tile warehouse (more akin to a retail use in reality) and an undertakers. None of these uses are industrial, further weakening the role and relevance of the designation.

For the reasons set out above and previously submitted, we maintain our objections to the draft NCAAP and consider it unsound and look forward to the opportunity to discuss these issues further at the hearing when confirmed.



Please do not hesitate to contact me in the meantime should you have any queries or require any further information.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Matthew Blythin', written in a cursive style.

Matthew Blythin
Associate Planner

Cc. S Burton Esq. – New Ladderswood LLP



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