
Written Statement

Matter 2: Housing Need and Supply

On behalf of New Ladderswood LLP

Introduction

1. This Written Statement (“Statement”) has been prepared by Savills (UK) Limited on behalf of the New Ladderswood LLP in the context of their land ownership at Ladderswood Estate (“the Site”). This Statement sets out our responses to Matter 2 (Issue 2.1)
2. This Statement should be read in conjunction with the initial representations (dated 22 May 2024) which refer to Site Allocation “SA7.3 Ladderswood Estate” (“the Site Allocation”) within the London Borough of Enfield (LBE). The Site is bound to the north by Upper Park Road, to the east by Palmers Road and to the south by Station Road. The Site is located within a Place Shaping Priority Area/Regeneration Priority Area and a very good level of connectivity (i.e Public Transport Accessibility Level (PTAL)) rating of 5 (with 1 being the lowest and 6 the highest) as denoted by Transport for London (TfL).
3. The redevelopment of the Ladderswood Estate was approved on 14 February 2014 (application reference P12-02202PLA). The application approved the Masterplan for a mixed use scheme comprising 517 residential units, 1,486.04 sqm of commercial floorspace lining the Station Road frontage, 297.25sqm of community centre floorspace, an 80-bed hotel together with associated amenity, child play facilities, landscaping enhancements, energy centre and new access to Station Road.
4. Following the granting of planning permission in February 2014, development was implemented on site in 17th March 2014 and since then significant progress has been made, including the demolition of existing buildings in 2014 and 2015. The planning permission is split into 6 construction phases. Phase 1 completed in 2017, Phase 2 (including the hotel) completed in March 2020, Phase 3 completed in November 2020 and Phase 4 in November 2024. Phase 1 was first occupied in October 2017.
5. The remaining Phases 5 and 6 are the subject of this representation. Under the previous (P12-02202PLA) consent, Phases 5 and 6 comprise of 158 dwellings, largely designed as 3 and 4 bedroom private tenure houses alongside 10 shared ownership and 21 social rent homes. In March 2024, an initial feasibility study was prepared to test options for increasing housing delivery on the remaining phases. These options have been taken informally to LBE Planning and Regeneration teams for initial high level feedback. New Ladderswood LLP is currently in the process of submitting

for pre-application advice in relation to the proposed scheme that will seek to increase housing delivery.

6. The Ladderswood Regeneration site provides significant redevelopment opportunities to deliver a mixed use redevelopment. Having reviewed the *IN2: Appendix 1 – ‘Stage 1’ Matters, Issues and Questions*, we consider that some elements of the draft Local Plan are **not sound** for the reasons set out below.

Issue 2.1: Whether the assessment of overall housing need and the housing requirement is justified, positively prepared, consistent with national policy and in general conformity with the London Plan.

7. Issue 2.1 is situated within Matter 2: Housing Need and Supply, and asks whether the assessment of housing need is **justified, positively prepared** and **consistent** with national policy and in general conformity with the London Plan. Question 2.1 asks whether the housing requirement of 33,280 homes by 2041 is appropriate, in particular, part C asks if this approach is consistent with Policy H1 of the London Plan:

Q2.1: Is the housing requirement of at least 33,280 homes by 2041 justified and positively prepared. In particular:

c) Is this approach consistent with the requirements of Policy H1 of the London Plan?

8. As part of the evidence base development capacity, the Ladderswood Estate (SA7.3) Site Allocation estimates a housing capacity of just 107 units. Whilst it is understood that the capacities are indicative only, the Site’s optimal capacity should be developed through a design-led approach. In relation to Question 2.1(c), London Plan Policy H1(B)(3) states boroughs should establish ambitious and achievable build-out rates. The London Plan also states that housing intensification should be adopted in appropriate existing low-density sites seeking to optimise the potential for housing delivery on all suitable brownfield sites.
9. We consider that the in relation to the Site Allocation “SA7.3 Ladderswood Estate”, the proposed housing requirement of 33,280 homes by 2041 is **not in general conformity** with London Plan

Policy H1, as per Q2.1(C). We consider that in order for the housing requirement to be in general conformity with the London Plan the estimated site allocation housing capacities should be refined to make it explicit that the figure for residential units is a **minimum** requirement acting as a starting point for developers. This would ensure that the Local Plan is **effective** in its assessment of overall housing need and ensure that increased future flexibility is built into regeneration scheme.

Conclusions and Recommendations

10. For the reasons noted herein, the current drafting of the proposed housing requirement for Enfield is unsound in the context of the London Plan. New Ladderswood LLP respectfully suggests that further emphasis be afforded to the encouragement of high density housing intensification in appropriate areas, encouraging the adoption of 'minimum' site allocation housing capacities, in order to appropriately maximise housing supply. This will ensure that the overall assessment of housing need is **effective** in its delivery.
11. We look forward to acknowledgement of receipt of these representations and any additional information about the examination hearing sessions which we have applied to participate in.

Word Count: 920 Words