



Ref:BF/EK5460/02(22July21) LBoE Council

Strategic Planning and Design
Enfield Council
FREEPOST
NW5036
EN1 3BR

22 July 2021

Dear Sir/Madam,

RESPONSE TO DRAFT ENFIELD LOCAL PLAN CONSULTATION JUNE 2021 LOMBARD HOUSE, SOUTHBURY ROAD, ENFIELD, EN1 1TW

We act on behalf of our client, ESN (Scotland) Ltd, who are the landowners of the Lombard House, Southbury Road, Enfield, EN1 1TW (herein referred to as 'the Site'). Our client wishes to make representations in relation to the London Borough of Enfield Council's Draft Local Plan Consultation. In particular, we wish to draw the Council's attention to the opportunity the Site presents in relation to the delivery of a mixed-use development within the Borough.

This representation is submitted in tandem with a request for pre-application advice for a proposed residential led mixed use development over the Site. The pre-application request includes detailed analysis on the quantum and mass of development that could potentially be delivered.

Site Location and Context

The Site is known as Lombard House and is located at 339 Southbury Road, Enfield, EN1 1TW (see figure 1). It's bound by Southbury Road to the north; adjoins a Waitrose distribution centre to the east; and, car parks to the south and west, which serve a number of retail premises. Opposite the site, on Southbury Road are a number of office and commercial buildings and a 5-6 storey residential building (Southbury House). Further to the north-west is the Colosseum Retail Park. The De Mandeville Gate Retail Park lies south and west of the Site.

The Site includes a 2-3 storey brick building (see figure 2) with associated car parking to the east and south. Vehicular access is provided via a signalised intersection off Southbury Road. The building is currently occupied by PureGym.

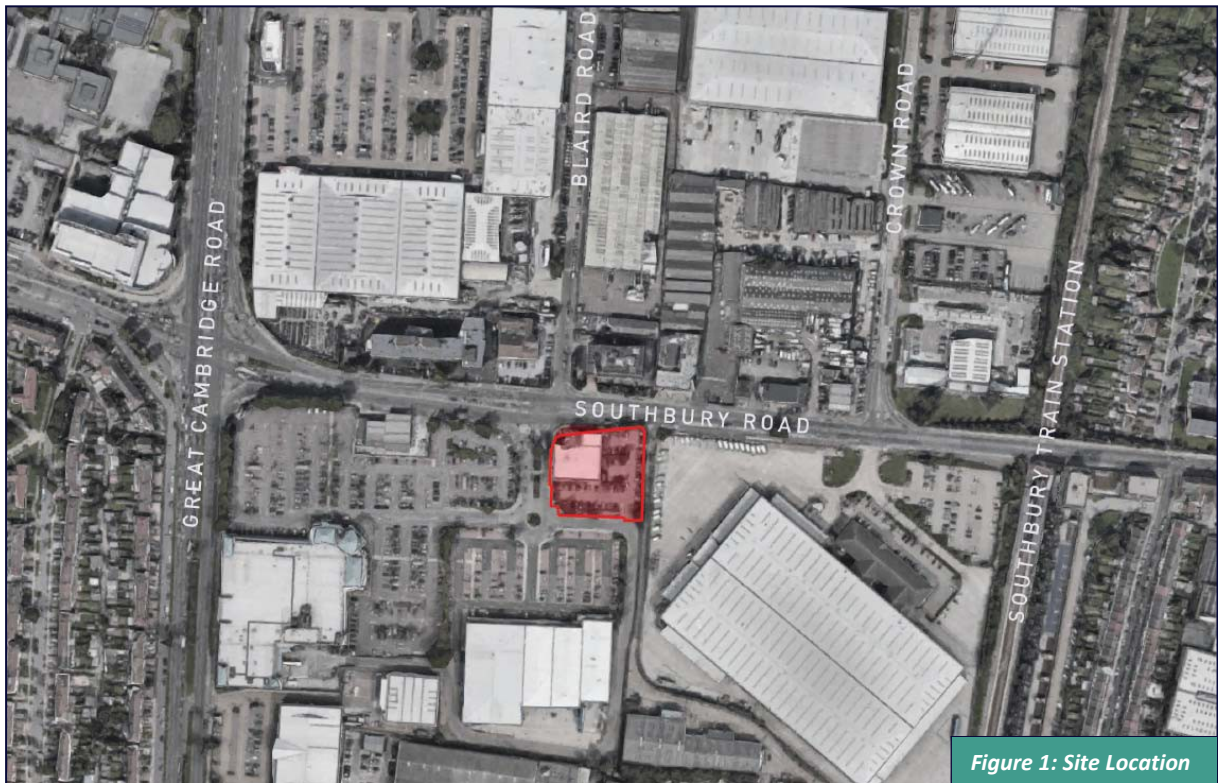


Figure 1: Site Location



Figure 2: Photograph of site viewed from Southbury Road

Emerging Policies

The Council's emerging spatial strategy is outlined in Strategic Policy SS1. Point 4 of the draft spatial strategy states,

“Enfield Town, Meridian Water, Edmonton Green, Southbury, Southgate, New Southgate and Angel Edmonton will be major urban foci of high quality growth, accommodating a range of employment, retail, leisure, housing, community and cultural uses and enhanced public realm to support their roles as vibrant centres. The centres will also act as green focal points in the wider green and blue network with green infrastructure providing a strong framework for their development.”

The Site is located within the local area of Southbury. We note that the Council's emerging vision for the area is as follows.

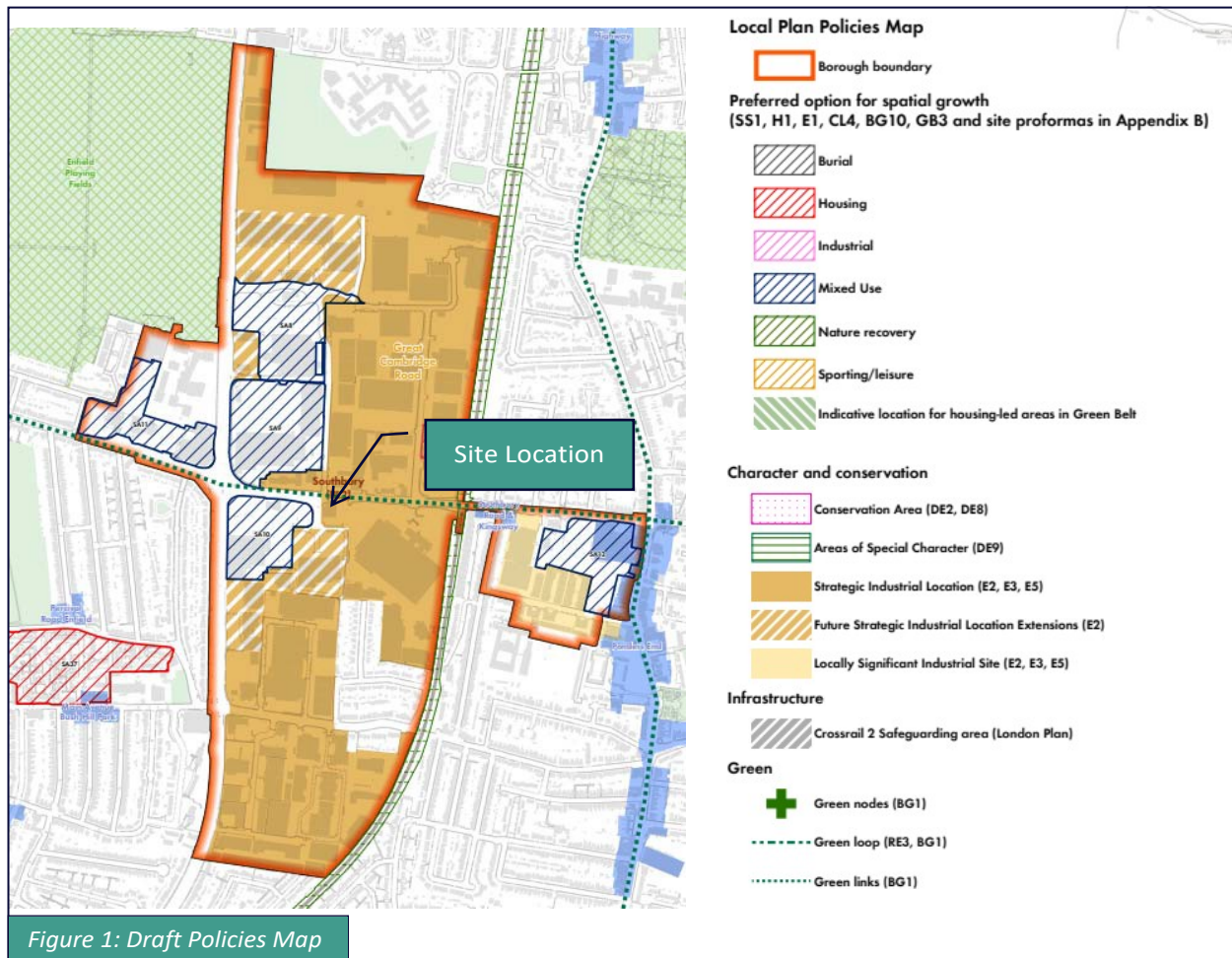
“Southbury will act as a key gateway in to the Lee Valley, Ponders End and Enfield Town. New residential-led mixed use development will be introduced including some taller buildings that will mark the area's role as a gateway to Enfield. It will have transformed into a coherent, exemplary, high-density, mixed-use quarter containing pocket parks and high quality public realm with new street trees and planting that offer a highly attractive environment to live and work in. Intelligent landscape design will improve air quality and reduce noise pollution from the A10. Intensification and co-location within the Great Cambridge Road Strategic Industrial Location will provide good local employment opportunities and renewed employment floorspace, together with the proposed SIL extension areas.”

Strategic Policy SP2: Southbury, sets out a number of initiatives the Council seek to achieve in order to realise the placemaking vision for the area. These include (inter alia):

- *a holistic masterplanned and comprehensive approach. The Council will prepare a spatial framework or masterplan for Southbury, to be adopted as an SPD, alongside preparation of a bespoke public realm design guide/code to support delivery of the placemaking vision for Southbury. Development in this area must be brought forward in accordance with a planned and coordinated approach for this area as set out in adopted and emerging SPDs.*
- *an appropriate mix of uses with potential for creation of a new local centre. The quantum of non-residential floorspace delivered on each site should lead to no net loss, unless it can be demonstrated this is not viable. This should be achieved by offsetting any reduction in retail floorspace by provision of appropriate employment, leisure uses, community and cultural facilities.*
- *the design of high-density development of exemplary quality in order to be considered acceptable. The principle of appropriately sited tall buildings - of a suitable scale - in this location will be acceptable to help accommodate growth in line with Policy DE6: Tall buildings and Figure 7.4 and any updating successors.*

The supporting text outlines that Southbury includes five site allocations (discussed further below) that will assist in delivering the above vision. The quantum of development proposed will be delivered by increasing the number of tall buildings, which would be considered anything above 15-storeys.

Enfield Council's Draft Policies Map shows the Site is located within a Strategic Industrial Location, adjacent to a mixed used allocation (SA10), immediately to the west.



Emerging Policy E3: Protecting employment locations and managing change of the Draft Local Plan discusses Strategic Industrial Locations and seeks to safeguard these areas (also identified in the London Plan) to meet strategic economic needs. It also states proposals that result in a net loss of light and general industry, storage and distribution, research and development and related sui generis floorspace in these areas will be refused.

Emerging Policy H1: Housing development sites, allocates the adjoining site to the west (Morrisons Supermarket) of the Site for mixed use development, delivering approximately 892 new homes (site allocation ref. SA10).

The current draft Local Plan consultation is seeking comments on the ten proposed placemaking areas, however in light of the Site's location, our client only wishes to comment on the proposed Southbury placemaking area. The consultation raises two questions here, as per below.

'1. Does the vision for Southbury set out an appropriate vision for the future of this place? If not, what components do you think should be changed or are missing?'

'2. Will the proposed placemaking policy for Southbury help to adequately deliver the aspirations set out in the vision? If not, what proposed changes, omissions or additions are required in the policy to help deliver the vision?'

As stated at the outset of this letter, this representation has been submitted in tandem with a request for pre-application advice from the London Borough of Enfield Council for a mixed-use scheme including 125 plus residential units and a ground floor gym.

We note that the Site is located in a Strategic Industrial Location (SIL) under the adopted and emerging Local Plans, and at this stage, is not allocated as a preferred option for spatial growth. However, we believe the Site has significant potential to deliver much needed housing within the Borough, which will complement the surrounding allocations and help deliver the emerging vision for Southbury.

The planning history for the Site confirms that the Council accepts that industrial uses on this particular Site are not feasible. The site was granted planning permission for a conversion from offices to a gymnasium in 2013 (application ref. P-13-00797PLA). The Officer's report accepted that the building would be difficult to convert to a light industrial use and therefore the loss of office space was their main consideration with regard to the change of use. The applicant submitted marketing evidence demonstrating the property had been vacant and competitively marketed for the preceding 3 years. This was accepted, demonstrating no interest in the unit and the offices being surplus to the borough's requirements. The Decision Notice and Officer's Report are included at Appendix 1.

The recently adopted London Plan (March 2021) includes measures that seek to intensify industrial areas and co-locate uses. Policy E7 of the Plan states (in bold for emphasis),

“Development Plans and planning frameworks should be proactive and consider, in collaboration with the Mayor, whether certain logistics, industrial and related functions in selected parts of SIL or LSIS could be intensified to provide additional industrial capacity. Intensification can also be used to facilitate the consolidation of an identified SIL or LSIS to support the delivery of residential and other uses, such as social infrastructure, or to contribute to town centre renewal. This approach should only be considered as part of a plan-led process of SIL or LSIS intensification and consolidation (and the areas affected clearly defined in Development Plan policies maps) or as part of a co-ordinated masterplanning process in collaboration with the GLA and relevant borough, and not through ad hoc planning applications.”

Whilst our client agrees with the broad vision for Southbury (Question 1) given the ambitious aspirations for growth and considerable increase in the number of tall buildings, we consider that our client's Site should be included as an additional site allocation for residential development (Question 2). There is strong justification to allocate the Site in the emerging Local Plan for mixed-use development, much like the adjoining Morrisons site to the west. There is also clear support at a regional level to use SIL sites to deliver housing within the London Plan area. In addition, Officers have historically discounted light industrial uses over the Site during their assessment of the most recent planning application to change its use from offices to a gymnasium.

As is demonstrated in the accompanying request for pre-application advice, the Site has the potential to deliver a significant quantum of housing that would contribute to the Borough's ambitious housing delivery targets. The proposal would contribute to the Council's draft vision for Southbury and sit comfortably within its context, given the envisioned intensification of the Colosseum and De Mandeville Gate Retail Parks through the draft Local Plan.

Call for Sites Form

We acknowledge that no representation was submitted to Enfield Council with regard to the Site during the Council's Call for Sites consultation. As such, we have completed the Council's proforma and attached this at Appendix 1 for the Council's consideration.

Conclusion

Overall, our client supports the Council's proposed spatial strategy, particularly for the area of Southbury. As discussed above, Lombard House presents an ideal opportunity to deliver a mixed-use development which will contribute to the Council's ambitious housing delivery targets, whilst still providing a ground floor commercial use to serve future residents and provide ongoing employment opportunities. As such, we believe the Site should be included as a preferred option for mixed-use development; essentially an extension of the draft allocation of the adjoining Morrisons Supermarket to the west.

We thank-you for the opportunity to submit comments in relation to Enfield Council's draft Local Plan and look forward to seeing how the plan advances. Should you have any questions in relation to the contents of this submission, please contact Brie Foster or Ed Kemsley at Peacock + Smith on 0203 122 0030 or brie.foster@peacockandsmith.co.uk or ed.kemsley@peacockandsmith.co.uk.

Yours Sincerely,