

13 September 2021



Strategic Planning and Design  
Enfield Council  
FREEPOST  
NW5036  
EN1 3BR

Emailed: [localplan@enfield.gov.uk](mailto:localplan@enfield.gov.uk)

Dear Sir/Madam

**London Borough of Enfield Draft Regulation 18 Local Plan Public Consultation – comments submitted on behalf of Areli for BlackRock and a Consortium of Landowners**

This representation is submitted by Savills (UK) Limited (hereafter known as ‘Savills’) in response to the London Borough of Enfield Council’s (‘LBE’) invitation to submit representations in respect of a public consultation on the Regulation 18 draft of the new Local Plan. These comments are submitted on behalf of Areli for Blackrock and a consortium of Landowners.

We welcome the opportunity to work in collaboration with LBE to bring forward the draft Local Plan in line with Regulation 18 of the Town and Country Planning Act (Local Planning) (England) (2012) which can positively enable the Council’s ambition to produce a document which has its residents’ best interest and greatest quality of life in mind.

Proposals for the renewal of Brimsdown to be brought forward through a programme of intensification and co-location have been developed in collaboration with LBE for the past 24 months. A Project Feasibility Agreement (PFA) was signed covering a structured framework in which both parties committed to engaging in a series of collaborative meetings, evidence gathering and scheme feasibility testing from February 2020 to June 2020.

**Prologue**

As the responsible authority for the area, your Council has the task of preparing a plan to guide development across Enfield over the next 15-30 years. That plan needs to be prepared in co-operation with a wide range of stakeholders including central and regional government, technical consultees, local communities, businesses and landowners to name but a few. The plan approach that you adopt will determine the quality of life for your residents, the economic context for the businesses based in the Borough, and the level of confidence that investors will have in your Borough over that plan period. It is a fundamental component of future strategy!

And because of that, we think that your plan should do more than preserve a ‘status quo’ in terms of quality and place. We think that your plan should not satisfy itself with simply being robust. Rather your plan should demonstrate an ambition to make Enfield the most investable and forward thinking Borough in London. We do not think that the current draft plan is as forward thinking as it could be. The suggestions set out in this representation we make in the spirit of positively embracing change for the benefits of those who live, work and visit Enfield.

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

Savills (UK) Limited. Chartered Surveyors. Regulated by RICS.

A subsidiary of Savills plc. Registered in England No. 2605138. Registered office: 33 Margaret Street, London, W1G 0JD



Your analysis identifies a series of major challenges for the Borough, notably:

- A desperate and pressing need for new homes;
- A desperate and pressing need for new affordable homes;
- A desperate and pressing need to deliver more family homes;
- A fundamental need to 'level up' between the prosperous west and deprived east and create opportunity for people to better themselves;
- A need to provide enough employment land to meet the needs of business to provide jobs for your residents;
- A need to remove the impenetrable physical barriers that limit movement between communities and prevent people from connecting with the Borough's blue and green spaces;
- A need to make the places people live, work and relax in a beautiful community;
- A need to reduce the need for people to travel and reduce day to day energy consumption; and
- A need to provide access to a physical infrastructure that allows people to live healthy lives.

We completely concur with your analysis of the challenges that you face and it is our view that a failure to effectively address these challenges in a meaningful way will fundamentally impact on the quality of lives of your residents for a generation.

You have considered a number of alternative strategies to address these challenges. Of concern, even at this early stage, your own conclusion is that most of the options you are considering will be found unsound and that even your most favoured strategies run a real risk of being found unsound. It is our view that this cannot be a credible starting place for such a significant document.

Examining each theme in turn:

### Housing Delivery

Performance to date has been poor. So poor that the levels of under-delivery mean that the Borough, alongside 26% of London Councils, has failed to meet the Housing Delivery Test such that there is now a presumption in favour of sustainable development.

Your plan considers how it should address this issue by considering three growth scenarios - to seek to deliver 17,000 homes; to seek to deliver 25,000 homes; or to seek to deliver 52,000 homes.

The target of 17,000 homes is derived from a vision that seeks to avoid any release of Green Belt for housing or any co-location within Strategic Industrial Land (SIL). It represents 68% of the minimum requirement set out in the 2021 London Plan, a document already deemed to be out of date in terms of the quantum of delivery required to meet need. It is patently clear that a housing delivery strategy constrained by an absolute protection of Green Belt and SIL is going to be unable to meet the need for housing set out in any credible growth forecast.

The target of 25,000 homes is derived from a vision that seeks to meet the minimum requirement set out in the 2021 London Plan. As noted above, this target is already out of date. It is our view therefore that this target is not the right target to seek to measure delivery against. Even if it were achieving this level of provision also necessitates a review of Green Belt and SIL in order to define land that might be re-zoned to accommodate housing growth. Green Belt land should only be considered for release in exceptional circumstances and as part of a plan based review. It should not be released where there are other alternatives and these ought to be considered first. Unless other constraints on delivery are identified, the release of SIL ought to be sequentially preferable to the release of Green Belt.

SIL release additionally benefits from a positive planning policy framework which is already set out in the adopted development plan and which anticipates SIL release to enable co-location of uses. Whilst the Borough states that they have tested options for SIL release before considering Green Belt release, we do not consider that this exercise has been thoroughly or robustly undertaken and for these reasons, the opportunity that we have presented plainly to the Council at Brimsdown which is deliverable and viable has, in our view, been incorrectly overlooked and ignored. Under this London Plan based target, as much as 25% of planned housing growth has been allocated to Green Belt sites. That 25% equates to some 6,000 homes. Assuming a modest average gross dwelling size of 100sqm, that equates to 600,000sqm (or nearly 6.5million sq ft) of new built floorspace in the Green Belt; that's before gardens, other amenity, community spaces and the wider supporting infrastructure of schools and shops have been allowed for. Whilst our masterplan for Brimsdown is at an early stage of design development, initial analysis tells us, alongside increased employment floorspace, that Brimsdown has capacity for 7,500 homes or 125% of the total number of homes that your plan is proposing to locate in the Green Belt or more than a year's supply of housing for the entire Borough based on the London Plan minimum target.

The target of 52,000 homes is derived from the latest government assessment of housing need. This is the level of delivery that needs to be enabled if we are to provide the homes that people need. This is the level of delivery required to provide people with a quality of life and to begin to address years of under-delivery. Combined with Green Belt release on the scale envisaged by the Borough, the identification of Brimsdown as a site for co-location would increase housing delivery over the plan period from around 25,000 homes to 32,500 homes, achieving 62% rather than 48% of the governments objectively assessed housing need. Whilst falling short of 100%, this level of provision would be a very significant and material improvement on the ability of the current plan to provide for housing growth. It is our view therefore that the plan should seek to deliver the maximum number of homes over the plan period up to the target set by the government of 52,000 homes. The plan should be reframed accordingly. A plan that failed to anticipate this level of need will not pass the relevant tests.

#### Affordable Housing Delivery

Whilst London authorities are increasingly beginning to deliver affordable housing themselves, government has relied on private developers to deliver a substantial quantum of affordable housing as a duty on development over an extended period of time. There is no suggestion that this duty will be removed and adopted policy typically requires 35% of all new homes delivered in a development to meet the definition of 'affordable housing' subject to viability. It is reasonable, therefore, to assume that a substantial component of affordable housing delivery will continue to be linked to the delivery of market housing over the plan period. It follows that where global housing delivery targets are reduced, the amount of affordable housing that can be delivered is also likely to reduce.

As with housing in general, there is a desperate and pressing need for the delivery of affordable homes. Objectively assessed need in Enfield for affordable housing is currently running at 113% of total planned housing delivery over the plan period. This is a patently unachievable target and Enfield can only hope to begin to deliver enough affordable housing to meet need by driving a step change in housing delivery over and above the minimum targets set out in the London Plan. It is well established that there is a proven link between the quality of people's living accommodation and their physical and mental health. Building Research Establishment data has previously suggested that poor housing costs the NHS at least £1.4bn annually (Wilson et al 2019). By allocating Brimsdown as a location for co-location, we estimate that an additional 2,625 affordable homes could be delivered over the plan period which, at an average occupancy of 3 people per

dwelling could meet the housing need of 7,500 people. To put this into context, your council advise that around 550 social housing properties typically become available in any given year whilst around 4,000 people approach the Council for help.

### Family Housing

Housing need is not constant and we recognise that the Borough will experience different levels of need for different types of housing. In this regard the Borough have made it clear that there is a particular need for the delivery of more family housing in the Borough. Brimsdown, as a significant masterplan area, with more than 1.2km of riverside frontage, presents a huge opportunity, alongside employment, to deliver housing of all types, to include a significant proportion of family housing that will not only enjoy a direct relationship with the Lower Lea Valley Park but will also be connected to other local communities, the wider City and, through a 'work and live' ethos, will support opportunities for those working thought out the estate to enjoy spending time with their families at the beginning, in the middle and at the end of the day, with a much more efficient carbon footprint achieved principally through a reduced need to travel. Whilst Green Belt sites offer some opportunity to deliver high quality homes, no other site in Enfield can offer the combination of proximity to nature, proximity to work and connectivity both locally and on a City scale as Brimsdown.

### Levelling up

The plan makes much of the need to level-up. Enfield is variously described as one of the London Boroughs with the highest levels of deprivation and greatest disparities in life opportunities from east to west. This must change. In part, opportunities to level up will flow from opportunities to live in better homes, get a better education, to have greater visibility of and become part of the world of work, to live a healthier lifestyle with better food and more exercise, and to rest and relax in places that are beautiful and where sport, entertainment and culture enrich lives. All of this takes investment and it is our view that the development plan should actively encourage investment in the east of the Borough where it enables delivery against this agenda. In this regard, it is our view that Spatial Strategy Option 6 ought to be given greater weight in the analysis of preferred options than has currently been afforded to it. Option 6 appears to have been dismissed on the basis that the east of the Borough has insufficient capacity to accommodate growth. Our analysis which was worked up in collaboration in the Borough over the last 24 months shows that this is not correct.

As demonstrated by our Manifesto for Brimsdown, there is very significant capacity for growth in the east of Enfield that the Borough has chosen to ignore. There is a suggestion that development in the east of the Borough cannot be supported in terms of investment in green and blue infrastructure. Again, as the Manifesto for Brimsdown makes clear, development would be accompanied by a massive investment in blue and green infrastructure which would not only benefit the new communities created within the masterplan but would also benefit the existing communities in the east of the Borough who are currently cut off from the amenities that already exist. The suggestion that investment in the east will not deliver family or affordable housing is fundamentally flawed and has already been explored in this representation. The statement that development projects such as that proposed at Brimsdown are unviable is without compelling evidence and whilst the Borough have raised concerns around viability, this is not, as promoter and sponsor, our position. Rather, the Landowners, which includes the largest fund manager in the world, are positively promoting this strategy for Brimsdown as part of their redefinition of what makes good employment land.

### Delivering Employment Land

We note that Enfield have identified a need for an additional 250,000sqm of employment land over the plan period. In order to enable this level of delivery the Borough have again resorted to Green Belt release as a path

of least resistance for around 100,000sq m of this level of planned growth. As with housing delivery, Green Belt land should only be released in exceptional circumstances and where there are no other sequentially preferable alternatives. The Landowners are fundamentally interested in delivering a next generation of employment land at Brimsdown.

Land, traditionally occupied by manufacturing and distribution business is not beautiful. It is rarely well located and workers are unable to get home at lunchtime. It is typically 'hard' in appearance and dominated by tarmac and simple sheds. There is minimal provision for health and wellbeing and green spaces are largely absent. Opportunities to relax and socialise are limited to immediate colleagues and facilities rarely stretch further than a hot food takeaway van. This is not the sort of employment space we should be aspiring towards in 2021.

Contrast the plight of the manufacturing and distribution industries which have been dominated by operational requirements with the evolution of the office, and notably the 'tech' office. Workplaces are embedded into City districts that enjoy a mix of employment, residential and supporting uses. These districts are embedded with a cultural infrastructure and the facilities and environments that promote mindfulness and a healthy lifestyle. These are the types of facilities that we ought to be providing for our blue collar workers on industrial and distribution parks.

To thrive, we will need to generate an increased density of population. This will partly be achieved through industrial intensification and partly through co-location. In fact these strategies go hand in hand and by embracing a masterplan led approach, the business case for investment to achieve better and more beautiful places can be realised by driving rents that can be sustained by a quality of environment that employers choose for their employees, by driving increased levels of occupancy because businesses are occupying real estate that contributes to the happiness of the workforce and driving down vacancy, and by driving investment values through an increased intensity of occupation of a given area of land. Where we can agree a masterplan approach, and trigger the case for investment in intensification and co-location, we anticipate being able to achieve a 30% uplift in employment floorspace across the masterplan area when compared to the baseline. Within the draft Brimsdown masterplan, this uplift translates to around 30,000sqm of additional employment floorspace or around one third of the quantum of new business floorspace that the Borough are currently directing towards Green Belt sites. As noted earlier in this representation, there is already an adopted policy basis in the development plan to drive forward strategies for intensification and co-location of SIL at policies E4-E7 of the 2021 London Plan.

A policy approach led through intensification and co-location set out in the Enfield Local Plan would therefore be in conformity with the strategic plan for London. Enfield's suggestion that to follow a strategy of co-location would be to diminish the value of the SIL as a whole is to have fundamentally misunderstood the vision and strategy prepared by its owners for Brimsdown - a strategy designed to increase the quantum of employment floorspace, increase the quality and inherent flexibility of the built assets through renewal, and increase the quality and diversity of the wider place to better meet the needs of employers and employees and sustain higher occupancy levels over longer periods of time, coupled with increased staff retention. A 'levelling up' between the environments currently enjoyed by the 'white-collar' worker and the 'blue-collar' worker. Not to invest in the core of the estate in the manner described would be to miss a fundamental opportunity to enhance the Borough's employment offer as the 'workshop' of London. Concerns the introduction of a 'hub' which has the potential to enhance the lives of those working in the estate on many levels, could prejudice its function are unsubstantiated. Whilst of a very different generation, the value of hubs as part of wider employment areas is clearly evidence by the success of the North Acton 'Southern Gateway' as a key focus for Park Royal and in that case, a hub which also begins to fuse the worlds of work and education.

The opportunity at Brimsdown is so much greater because in addition to introducing a breadth of land use, the masterplan spine can release so much more benefit for the workforce and surrounding communities as a connection to the Lower Lea Valley Park. Business to business relationships within the estate will be enhanced by the co-location corridor and operational relationships are not disadvantaged (physical links between businesses are currently only achieved by travelling out of the estate to the A10 and then back in) whilst strict building design codes will ensure that the new uses do not disrupt the operation of the existing uses. In adopting such a policy, the London Plan has already tested the potential relationships and found that they are sustainable. We therefore think that the plan should positively plan for intensification and co-location at Brimsdown.

The demand for industrial floorspace and co-location has been further discussed in Appendix A by Savills Industrial.

### Breaking Down Barriers

Much is made in the emerging plan of the need to break down barriers created by infrastructure. Typically these barriers are identified as road and rail. However, this is to miss the very significant barriers that larger, mono-use, pedestrian hostile environments can present to movement. The Brimsdown industrial estate runs from just north of Ponders End in the south to just south of Enfield Lock in the north. As such, it represents about 25% of the total north-south dimension of the Borough. It is extremely inhospitable to pedestrians and cyclist alike and, given very low levels of natural surveillance and intensity of use, is fundamentally unsafe. This environment directly abuts the Lower Lea Valley Park, one of the most significant environmental resources in Enfield and an intended hub of London's National Park City.

To maintain a barrier between some of the most deprived communities in London and some of its best green and blue open space would be to plan very poorly. But to create a safe and secure link, any new route will need to be inhabited and overlooked. The adopted policies of the London Plan regarding co-location provide the policy framework against which safe and secure new links can be knitted through the existing employment area for the benefit of all. Linking Brimsdown Station directly to the Lower Lea Valley Park also potentially unlocks opportunities for Brimsdown to become a staging post for activity and outdoor pursuits, offering further opportunities for economic diversification and intensification and opportunities for investment in new growth sectors to the benefit of local residents.

### Beauty

It cannot have escaped anyone that industrial estates, including those at Brimsdown, must be some of the least beautiful environments that have been created in the UK. Driven by functional and operational considerations, industrial estates are often inhuman and lacking in amenity. The value to be driven through intensification and co-location unlocks the opportunity to deliver better buildings, better spaces between buildings and to encourage a greater density of occupation that can support better uses, all contributing to better lives and more beautiful places. The Manifesto for Brimsdown demonstrates what could be achieved at Brimsdown with the right vision without compromising operational logistics.

### Living near work

The planning system is, at its most fundamental level, driven by the principles of sustainability. Core in this ambition, and pertinent in the light of the climate change emergency that has been declared across the majority of London Councils, is the need to reduce the use of energy. One significant consumer of energy is the need to travel and the planning system has therefore long considered how best to enable people to live close to

where they work. Whilst there are already local communities along the western periphery of the Brimsdown Industrial Estate, albeit many of which are prevented from easy travel into the employment area by the railway line, there is no one living in the estate, as people might live in town centres, above shops or the CBD of a City.

Traditionally, the nature of industrial areas and the nature of the uses that have been carried on therein have counted against co-location but, as anticipated by the Mayoral co-location policies, where the agent of change principle is robustly applied, there is now considerable scope for people to live at their place of work. Many examples have been permitted in the UK and many examples have been built out in the UK and across the globe. There is no suggestion that residential uses are incompatible with the function of industrial land and this is again demonstrated through the adoption of the London Plan policy E7 on co-location. The masterplan for Brimsdown will promote more sustainable patterns of work, consistent with the ambition of government guidance and the thrust of the planning system.

### Enabling Healthier Lifestyles

As noted earlier, monocultural industrial estates are not pleasant places for employees of the companies located there. Monocultural industrial estates of the scale of Brimsdown also introduce physical barriers which prevent existing communities from accessing their green and blue spaces. Where a planning strategy pushes new homes into the Green Belt, away from the location of jobs, that strategy increases reliance on travel and most likely travel by car. Where investment arrives in the west of the Borough when it could arrive in the east, historic patterns of disparity will be reinforced. Where people's homes are so far from their places of work that they cannot see family at lunchtime, social bonds will weaken. Where people spend more time travelling to work, they will have less time available to promote their mental, physical and social wellbeing.

For all of these reasons, we believe that a more progressive and ambitious strategy focussed on industrial intensification and co-location at Brimsdown can only have a positive impact on the health and wellbeing of the people and communities who live and work in the Borough.

So, where does that take us?

In our view, your current local plan strategy is at significant risk of being found unsound. It fails to deliver an appropriate number of new homes to meet need and fails to stimulate investment in the east of the Borough, consigning existing communities to years of underinvestment. It fails to break down existing physical barriers to movement and lacks ambition and vision, preferring to maintain a tired 'status quo' than drive industry to deliver a next generation of space and place.

If identified, Brimsdown on the other hand, can deliver significant employment growth in terms of quality and quantum of opportunity, reducing pressure on Green Belt land release and achieving the basic objectives (and rather more than the basic objectives as part of a progressive agenda) of SIL. If selected, in addition to delivering a positive employment story, Brimsdown will also make a very substantial contribution to housing supply, again in terms of quality and quantum, again reducing pressure on Green Belt land release. By generating a better and more connected place, Brimsdown will also confer significant benefits on the existing communities of east Enfield, many of whom are amongst the most deprived in the Country. An allocation for industrial intensification and co-location at Brimsdown is consistent with the adopted strategic plan and is sustainable, viable and deliverable and is likely to be found sound. Brimsdown will become a more beautiful and vibrant place to the benefit of all. The Landowners represent the best delivery partner that the Borough could hope for in this endeavour.

We very much hope that you will take this opportunity to reconsider your strategy and work with us in partnership to invest in your Borough.

## **Brimsdown**

We welcome the opportunity to work in collaboration with LBE to bring forward the draft Local Plan in line with Regulation 18 of the Town and Country Planning Act (Local Planning) (England) (2012) which can positively enable the Council's ambition to produce a document which has its residents' best interest and greatest quality of life in mind.

As currently drafted, the Reg 18 plan does not plan for the scale of change that we want to bring forward at Brimsdown and our substantive representation is therefore to request the Council to include Brimsdown as an allocation for employment and housing growth. In the absence of an allocation, it is our position that the local plan will be flawed and found unsound as it will not have maximised opportunities for housing delivery, will not have included employment intensification, will not create beautiful places and will not have applied an appropriate sequential approach to the release of land to meet growth and need.

As previously mentioned, Areli on behalf of a consortium of landowners entered into a planning performance agreement with LBE covering a structured framework in which both parties committed to engaging in a series of collaborative meetings, evidence gathering and scheme feasibility testing from February 2020 to June 2020. Both parties worked collaboratively. Together, the proposals for the renewal of Brimsdown to be brought forward through a programme of intensification and co-location were developed.

The proposals for Brimsdown have been assessed against a number of key criteria in workshops with Officers. These included:

- Transport;
- Strategic Industrial Intensification Evidence;
- Employment Land Study;
- Social, Energy and Transport Infrastructure;
- Capacity and Viability; and
- Placemaking.

The findings of each assessment were positive and demonstrated that in principle, the Site's size and location leaves it accustomed to delivering a significant number of benefits. These include:

- Making best use of land by optimising the intensification of brownfield land
- Protecting the Green Belt in line with London Plan Policy and the Mayor's expectations
- New homes in a sustainable location
- Scale of the site provides the opportunity to create lots of different housing typologies including a large quantum of 3 and 4 bed family homes of which a considerable number will be genuinely affordable.
- 1600 new jobs in new and existing industries
- 30% increase in industrial floorspace or 350,000 sq ft of additional space and a total of 1,500,000 sq ft;
- Creating nearly 30 acres of great new public realm and squares for new and existing residents, landscaped gardens and green roofs



Given the extensive, positive and collaborative engagement process undertaken thus far, we were disappointed to note that the Reg 18 draft does not reflect the discussions and conclusions that we reached together with LBE.

It is also noteworthy that since undertaking the above range of PFA workshops with Officers, Enfield now falls into the “presumption in favour of sustainable development” consequence by the Government due to its under-delivery of required housing in the Housing Delivery Test Results (2020). The borough only delivered 56% of their housing target in 2020. There is a desperate and pressing need for housing and affordable housing across London and in Enfield. Objectively assessed need for affordable housing in the Borough is alone running at 113% of the total planned level of provision for housing over the plan period. And the planned level of provision for housing in the Borough is running at 56% of need as defined by the Government’s new ‘Standard methodology’ or 32% of need as defined by the Government’s old ‘standard methodology’ with the cap removed.

Notwithstanding that Officers have not yet identified Brimsdown as a significant sustainable development opportunity, it is also apparent that the borough is looking to release Green Belt land in order to satisfy the above detailed housing delivery shortfall. For the reasons set out within this submission, we consider that there are significant unexplored opportunities with respect to the Borough’s untapped brownfield land supply through a strategic approach to site promotion and intensification, which could be allocated in Brimsdown in order to re-provide employment land as well as much needed housing supply and community infrastructure.

Not only this, there is a recognition that connections across the Borough are poor and that existing infrastructure restricts access to the Borough’s green and blue spaces. Brimsdown in its current form is currently acting as a barrier for local residents to access green space in their own Borough. Residents deserve better access to the Borough’s green and blue infrastructure and whilst recognising this as an objective, the plan fails to seize the opportunity to deliver.

Creating better connected spaces such as those proposed at Brimsdown will also support LBE’s ambition to be carbon neutral by 2030 by creating communities in which residents can live, work and play. Whilst the Plan acknowledges minimising the need to travel as a core component of minimising energy spend, it fails to consider long term strategies such as co-location that will allow Enfield residents to live in a more sustainable way.

We consider that a growth strategy led by a strategy of urban intensification ought to be capable of meeting the Borough’s objectively assessed needs which is reasonable and deliverable over the plan period and consistent with the principles of sustainable development as set out in the NPPF and as such, meet the relevant tests of plan making. We consider this to be a strategy that may not have been given full and appropriate consideration thus far and is one that should be explored.

We look forward to working with LBE on this matter and would request further dialogue upon receipt of this representation.

### **Main Representation**

We are pleased to note that LBE recognises its position in London as an area able to achieve substantial growth, significant housing delivery, economic recovery post COVID-19 and sustainable development.

LBE is well positioned in London to act as a centre for growth, housing delivery and economic recovery, as noted in the draft Local Plan. In addition to this, LBE have identified key potential hubs of economic recovery from the impacts of COVID-19 pandemic, intensification to deliver much-needed housing and sustainability to ensure London's resilience against the impacts of climate change. In conjunction with these ambitions, the draft Local Plan seeks to direct growth to key areas to promote these places to become an attractive destination for residents, visitors and workers. To this end, the emerging draft Local Plan rightly acknowledges the opportunity for large-scale change and growth across the Borough to deliver much-needed housing to ensure economic recovery and sustainability in the long run. However, in terms of the growth strategy identified within the Plan, it is considered that this is not yet fully formed and is currently inconsistent with more strategic/overarching policy guidance such as the London Plan (2021).

We have undertaken a review of the draft Regulation 18 Local Plan and our individual comments against each relevant guideline are set out below, with suggestions to delete the text with a ~~strike through~~ and add the additional text in red.

### Policy SS1: Spatial Strategy

As previously discussed, as Enfield failed to meet their Housing Delivery Test targets in 2020, the borough now falls into the 'presumption in favour of sustainable development' category. It is therefore considered that a strong growth agenda should be the main target of the Reg 18 to ensure that new homes are delivered in the borough.

In this vein, we support the overarching ambition of the spatial strategy to secure much needed new housing in a sustainable and fair way for the people of Enfield. However, we have identified a number of issues with the growth strategy outlined in the Plan.

The provision of new homes, employment, retail and leisure, green infrastructure, physical infrastructure and social infrastructure to create lifetime communities which could be self-sustaining and supportive of one another, where people choose to live and work for the longer term, should be the ambition of structuring and delivering services and infrastructure in the Borough. To achieve this in a sustainable way, it is considered that an innovative approach centred around intensification, co-location and building on brownfield land should be the primary route to meeting the needs of an expanding population.

As set out within the Plan, LBE have explored 7 growth options. We note that of the 7 growth options identified LBE have assessed the potential for each 'option' to be judged 'sound' and concluded, with the exception of the Green Belt led 'medium growth 1' strategy, that each of their alternative strategies can be expected to be found unsound. Furthermore, the preferred Green Belt led 'medium growth' strategy itself 'could' be found unsound also. With this in mind, Paragraph 22 of the NPPF (2021) states that strategic policies 'should provide a clear strategy for bringing sufficient land forward'. Given that each of the 7 growth options 'could' be found unsound, it is considered that the strategy to deliver growth in the borough is currently unclear and not suitable.

When analysing the proposed growth strategies further, it is noted that LBE have concluded that the most substantial reserve of undeveloped land which could have the potential to accommodate the Plan's identified required growth in the Borough is the Green Belt (25% of the total planned level of provision over the plan period). We also note that whilst an alternative scenario which could instead focus on industrial land release in order to provide sufficient land to build on has been identified, in the light of their target to generate more employment floorspace over the plan period, a Green Belt release-led strategy has been stated as the preferred

option. We wholly disagree with this approach and believe it undermines the ambition of the borough to deliver housing in a sustainable manner.

With the above in mind, following a review of LBE's Growth Topic Paper 2021, we note that other options for growth have been explored, such as the appropriateness of using Strategic Industrial Land (SIL) to accommodate growth from non-employment land uses. However, we note that the study only assesses the intensification of SIL which results in the loss of employment floorspace in favour of new homes. LBE's Growth Topic Paper states that:

*'release of Green Belt for housing is proposed because it is assessed as more deliverable and viable in the plan period and it provides a greater mix of housing need across the plan period. It provides family homes which are much needed. However, the consideration of releasing SIL for non-employment uses would harm the Borough's industrial economy and it would need to find further land for industry – this is likely to be in the Green Belt.'*

As extensively discussed with Officers through the PFA engagement, any development that came forward at Brimsdown could be delivered on a no net loss basis (despite this now not being a requirement of policy E7 in the London Plan (2021)). Indeed, the indicative masterplan developed as part of the PFA engagement process in fact delivered a 31% increase in industrial floorspace which will significantly contribute to the Borough's assessed need for 251,505 sqm of net additional industrial floorspace.

Additionally and as discussed with Officers, the proposals at Brimsdown include a range of housing and a range of industrial typologies that will be delivered across the plan period. Through the redevelopment of existing industrial land and urban regeneration sites, underutilised brownfield land can be optimised with Enfield continuing to deliver substantial quantum of development in the most sustainable and efficient approach in line with the NPPF (paragraph 137). It is therefore considered that the evidence base that informed the Growth Options has not sufficiently explored all options before concluding on the release of the green belt.

This sentiment is shown in LBE's Growth Topic Paper (2021) in which it is stated that LBE have explored a number of opportunities to accommodate growth in brownfield locations and concludes that de-designation of SIL at Brimsdown is not viable. However, we believe this to be unproven given the proposals discussed with Officers that seek to increase employment floorspace as well as provide much needed housing have not been properly considered or assessed.

It is therefore considered that LBE should include a growth option that properly considers industrial land release for intensification and co-location, assuming a scenario that does not necessarily lead to a net loss of industrial capacity and does not solely rely on the release of Green Belt land to achieve housing and employment targets. As Enfield is currently in the 'presumption in favour of sustainable development' category, it is considered that a proposal such as Brimsdown that is capable of delivering large scale development that can not only transform an underutilised brownfield site but also alleviate pressures elsewhere in the borough should be considered.

#### Policy SP E3: Protecting employment locations and managing change

Maintaining a viable employment base will be a critical part of ensuring the future economic sustainability of the Borough. However, as we have seen over recent months, the employment market is changing and both the response to the pandemic and increased digitisation are changing how and where we work. New working patterns are still becoming established and it is clear that any Local Plan looking to set an employment growth framework through to 2039 will need to ensure that its policies regarding employment provision are flexible and

can rapidly respond to the pressures and changes that businesses are likely to face over this long period of time.

Under occupied brownfield land offers significant potential to accommodate growth through co-location. Opportunities should be taken to optimise the potential of the land, which can be strategically developed to enable intensification and the introduction of a mix of uses. London Plan Policy H1 specifically states that Boroughs should optimise the potential for housing delivery on all suitable and available brownfield sites through their Development Plans and planning decisions.

Furthermore, the London Plan further states that large parcels of brownfield land in London are becoming increasingly scarce. Revitalisation strategies offer the opportunity to strike a balance between the intensification and co-location of uses in existing under occupied estates to unlock capacity in brownfield areas without needing to release greenfield sites and this capacity has not been robustly explored. Therefore, it is clear that identifying suitable brownfield locations that enable intensification that includes a mix of uses should be a key ambition of the Borough.

It is noted that the borough has only forecasted 13.5% of the required need for industrial land in the plan period to come from the intensification of existing industrial sites with a further 50% coming from greenbelt locations. It is considered that a greater percentage of land should be intensified to ensure that under occupied sites are fully utilised. AECOM's Industrial Intensification Report (2020) notes that 11 locations within Brimsdown have been identified as areas suitable for intensification. Through a range of typologies, we support the view that Brimsdown can deliver viable, intensified industrial floorspace whilst also making best use of brownfield land.

Optimising and reusing brownfield sites also provides an opportunity to create beautiful places, in line with the Housing White Paper's proposal, to connect residents to places for them to enjoy greater well-being and quality of life. This aligns with the NPPF (2021) that seeks to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places.

Therefore, whilst it is entirely appropriate for the draft Local Plan to seek to protect and enhance employment floorspace on brownfield land, to support its economy and provide employment for its residents, the complete exclusion of a mechanism to facilitate the delivery of residential uses within these same sites is considered to be contrary to the London Plan 2021, namely Policy E7 which states that:

*“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”*

It is therefore considered that Policy SP E3 should be amended to state the following:

*b. General and light industrial, storage and distribution, research and development and related sui generis uses (such as wholesale markets, waste management, utilities infrastructure) are encouraged in SIL, alongside ancillary office use and land for sustainable transport functions. Small scale food and drink and leisure uses which meet the day-to-day needs of workers and do not adversely affect the industrial status or operation of the area will be supported. Residential uses ~~are not permitted in SIL~~ will only be permitted when brought forward as part of a plan-led process of SIL intensification and consolidation as part of a co-ordinated masterplanning process in collaboration with LBE and the GLA”.*

Additionally, we understand that there is a concern that by ‘splitting’ the SIL, the quality of the industrial spaces will be diminished. We would encourage the borough to not view the SIL as being ‘split’ rather enhanced. There is no evidence to suggest that the introduction of a residential avenue through the centre of the SIL would diminish the efficiency of the SIL. In fact, given Brimsdown seeks to provide a range of industrial typologies, it is anticipated that this residential core will also feature commercial, maker spaces at ground floor which will not only assist with maintaining the function of the wider SIL but also provide a more diverse employment offer that can only benefit the residents of the borough. It is therefore considered that this space will be able to not only support and boost the economic function of the area but also provide much needed housing. This will also allow LBE to become a leader in the creation of co-located spaces, given this idea is relatively new in London.

The NPPF (paragraph 121) also supports a positive approach for alternative uses of land which are currently developed but not allocated for a specific purpose in local plans where this would help meet identified development needs. This includes employment land being redeveloped into other uses including for homes in areas of high housing demand, such as Enfield that is currently in a presumption of sustainable development. It also includes the creation of sustainable communities which allow people to live, work and socialise in one place.

We look forward to exploring the most appropriate measure to enable best use to be made of employment land in order to enable intensification, diversification and co-location in line with guidance and best practice.

#### Policy DM DE6: Tall buildings

We welcome the Council’s identification of Brimsdown Station as an appropriate area for tall building as set out in Figure 7.4 as this will help to optimise the development potential around the train station as a sustainable location. Within Figure 7.4 Brimsdown Station has been identified as appropriate for buildings of 48 metres with the rest of Brimsdown falling within an 800 metre radius of this point. Notwithstanding this, it is noted that the remainder of Brimsdown is not identified as an area suitable for tall buildings. We consider that the Policy should afford flexibility to areas not within identified tall building locations, particularly those within a radius of appropriate locations. Judgement should be made on a case by case basis on planning balance.

Notwithstanding the above, Brimsdown sits within LBE’s Viewing Corridor 9 which is known as the “Approach to Enfield Town” which begins from the top part of Windmill Hill near the junction with The Ridgeway, looking down between eastwards across Enfield Town, across Ponders End and the Lea Valley to Epping Forest.

By way of a comparison, Colosseum Retail Park (Ref: 20/00788/OUT) (approved at Planning Committee in September 2020) is within View Corridor 9. The application states that whilst the site is within a sensitive location, it “does not mean that it is inappropriate. Rather additional justification in terms of the views is required”. Furthermore, paragraph 11.6 of the Planning Statement argues that the site is free from heritage, physical and green belt constraints and is therefore not an inappropriate location for tall buildings. The Townscape and Visual Impacts Assessment shows that the impact of proposed tall buildings in the Site would have negligible impacts on the View Corridor 9 due to the trees and the rail bridge. Given that Brimsdown is set back further than this consented application, it is considered from an initial assessment that the impact of this viewing corridor should be negligible.

Furthermore, from a desktop review, it is noted that the topography of the land drops significantly, creating a basin like environment in which Brimsdown is located. This further suggests that the impact on viewing corridor 9 will be negligible.

It is therefore considered that the wider Brimsdown area could be an ideal location for a mix of building typologies to include taller buildings, particularly when the scale of the proposals at Brimsdown can supply a number of other benefits such as affordable housing, family housing, uplift in employment floorspace and uplift in biodiversity.

We therefore consider that this is a process that is best progressed through pre-application discussions with Applicants as individual proposals emerge and where the benefits of tall building proposals can be clearly understood and assessed, to ensure that they outweigh any perceived impacts and decisions can be made on a case by case basis.

#### Policy DM SE5: Greenhouse gas emissions and low carbon energy supply

Part 2 of Policy DM SE5 states that:

*“All major residential developments of ten or more dwellings and non-residential development of 500sqm GIA or more will be net-zero carbon. A cash in lieu contribution to meet net-zero carbon will only be considered acceptable in instances where it has been clearly demonstrating that no further savings can be achieved onsite, due to site constraints or limitations. Residual regulated emissions are to be offset at a rate in line with Table 4.4.”*

We support the ambition of achieving net-zero carbon for all residential developments of ten or more dwellings due to the pressing issue of climate change, and we emphasise the Council's vision of making Enfield a sustainable place for the long run as outlined in LBE's Enfield Climate Action Plan (2020). We would like to reinforce that climate action requires collaboration between stakeholders, thus it is vital that the policy clearly demonstrates the Council's willingness to work with developers and stakeholders to develop a strategy for the residential development to become net-zero carbon to ensure that this onus does not lie solely with developers:

*“The Council will work with developers and stakeholders to develop a strategy for all major residential developments of ten or more dwellings and non-residential development of 500sqm GIA or more ~~will~~ **be to ensure that these developments are net-zero carbon as part of the Council's wider vision concerning climate action.** A cash in lieu contribution to meet net-zero carbon will only be considered acceptable in instances where it has been clearly demonstrating that no further savings can be achieved onsite, due to site constraints or limitations. Residual regulated emissions are to be offset at a rate in line with Table 4.4.”*

#### Strategic Policy SP SC2: Protecting and enhancing social and community infrastructure

We note the Council's objective of seeking contributions towards new school places to meet the needs arising from new housing development and support the statement that the available capacity within existing schools and the number of pupils generated as a result of the new development will be considered. However, we consider that this is best captured in dialogue between the Council and developers in the Section 106 Heads of Terms so that any contribution to new school places is appropriate for the local need. As such, we recommend the changes below:

*“Contributions will be sought towards new school places to meet the needs arising from new housing development (excluding care homes), taking account of available capacity within existing schools and the number of pupils it will generate, from early years through to secondary education. New or*

*expanded schools will be expected to incorporate specialist provision where demand exists and make reasonable adjustments to support the needs of the disabled and mobility impaired. In exceptional circumstances, a contribution towards off-site outdoor play space will be accepted in the vicinity of the school in lieu of on-site provision. **These contributions will be captured in the dialogue between the Council and developers for the drafting of the Section 106 Heads of Terms.***

### Strategic Policy SP H2: Affordable housing

Draft Strategic Policy SP H2 sets out the requirements for the delivery of affordable housing, including the aim of securing 50% of all new homes across the plan period as genuinely affordable. We generally support the weight being given to the economics and financial viability of the development including any particular costs associated with it when determining the amount of affordable housing acceptable on the site. This approach is consistent with London Plan Policy H5 which requires financial viability assessment is undertaken to ascertain the maximum level of affordable housing deliverable on a scheme.

We would like to note that the draft Policy does not make reference to First Homes, a new affordable tenure that came into effect on 28 June 2021 as part of the Government's long-held ambition to get people onto the property ladder. First Homes are to be sold to first-time buyers at a minimum 30% discount and offered only to people with a local connection (that is, existing residents, those with local employment requirements, a family connection or caring responsibilities), key workers and members of the armed forces. The First Homes eligibility criteria also includes a household income cap of £80,000 (£90,000 in London). As you might be aware, a Written Ministerial Statement on 24 May 2021 states that local plans should take into account the new First Homes requirement from the adoption date. Therefore, this type of affordable housing should be included in the draft Policy. As such, we suggest the following amendments to the text below:

*"1. The Council will seek to maximise the delivery of affordable housing in the Borough and aim to secure 50% of all new homes across the plan period as genuinely affordable. **Genuinely affordable housing includes London Social Rent, London Affordable Rent, London Living Rent, First Homes and London Shared Ownership in alignment with paragraphs 4.6.4 to 4.6.7 in the London Plan (2021).**"*

### Policy DM H3: Housing mix and type

Draft Policy DM H3 sets out the Council's priorities for dwelling sizes in Enfield based on the findings in the Local Housing Needs Assessment (2020). However, we would like to comment that these priorities may not always be achievable in all sites due to their context and development aspects. Paragraph 8.3.3 states that a deviation from the policy "*will only be justified where the evidence clearly demonstrates that the priorities in the catchment area of the proposed differ from the list set out above.*"

As this paragraph acknowledges that each site has a different set of priorities in terms of dwelling sizes and local needs, we suggest that this paragraph is embedded in the policy to make it clear that the Council will prioritise certain dwelling sizes, but may allow a deviation from these priorities if it has been found that the priorities in the development area differ from the list set out in Table 8.4.

### **Conclusion**

Having reviewed the draft Regulation 18 Local Plan, we have concluded that there are fundamental issues with the proposed growth strategy that may hamper the Borough's ambitions to create a lifetime of opportunities for all residents, ensuring more quality homes in well-connected neighbourhoods, create safe, healthy and confident communities, and create an economy that works for everyone in Enfield. We have suggested a number of amendments to the wording of policies set out in this document. Fundamentally, we consider that the approach is flawed for the following reasons:

- Failure to meet housing need;
- Failure to adopt an appropriate sequential approach to land release;
- Failure to respond to policies E4-E7 of the London Plan 2021; and
- Failure to take the opportunity to deliver a better place for residents.

Principally, we wish to emphasise the need for a forward-looking document which guides the progress of Enfield and its growth strategy with regard to the release of SIL for intensification and co-location to overcome the challenges of COVID-19 pandemic, delivery much needed housing and meet contemporary and future community and market demands.

Brimsdown represents an excellent opportunity for regeneration, significant housing delivery and growth to benefit the local community.

Thank you for giving us the opportunity to provide commentary the Council's draft Regulation 18 Local Plan. We would be grateful for confirmation of receipt of these representations and trust that these comments will be taken into consideration and we look forward to continuing to work with officers to finalise the Local Plan.

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

On behalf of Areli for Blackrock and a Consortium of Landowners



## Appendix A – Savills Industrial Note

### Industrial Demand and Trends in London

**Demand** for industrial land in London is on the **up**, principally because of the demand/supply imbalance. Local Authorities should **positively plan** to accommodate this demand.

Given its location in proximity to population, in **Enfield** there is a particular demand for **logistics**.

**Efficient** portal frame **buildings** in yards characterise contemporary supply as these have delivered the **best** operational product and **return** on investment.

A **constrained** land **supply** in London is driving consideration by policy makers and the investment market of new and more intense **multi-layer** buildings. These typologies are most likely to succeed where values underwrite the higher build costs associated with buildings of this nature. Where promoted, the **design** of multi-layer buildings will be of particular importance to ensure that they meet the **needs** of occupiers.

These multi-layer buildings have the potential to deliver **more** employment **floorspace/ha** than their traditional single storey counterparts, thereby making more efficient use of land. Appropriate yard space provision must be enabled as part of any intensification equation to ensure that buildings can be efficiently served by articulated lorries in a secure environment.

Coupled with this, in a maturing market, operators and investors alike are placing **increased weight** on the **ESG** agenda, the quality of the environment they create and its ability to enhance the **wellbeing** of employees. Where other uses are included in a shared masterplan, detailed design solutions will need to ensure the safety of all users.

Newly adopted **London plan** policies anticipate both **intensification** and **co-location**. Intensification creates the opportunity for colocation and colocation creates the opportunity to drive a **sustainable quality of place** and to underwrite the 'town centre' **infrastructure** that employees on traditional parks have typically not had access to. Where co-location and intensification schemes are proposed these must nevertheless be led by the operational demands on the industrial buildings. For example, goods lifts will rarely be an adequate substitute for raised yards and vehicle ramps and sufficient space should therefore be allowed to ensure that the right industrial offer can be created alongside the new environments that can be created for employees.

**Technological** improvements mean that considerations such as noise, odour, and working hours that might have historically driven segregation in this sector can be **treated** at source. Restrictions on operation must be avoided through good design and the requirements for sectors such as food production 'hard-wired' into proposed building typologies.

Where the design is carefully considered and puts the needs of business to the fore, a **strategy** of selective **intensification and colocation** at Brimsdown that we understand begins to provide a solution to some of the Borough's broader challenges can create a new opportunity to **invest** in a **next generation** working environment that **maintains operational performance whilst looking forwards to meet the wider needs of the businesses who choose to locate here for the benefit of their employees**.

Savills Industrial  
September 2021