



13 September 2021

Strategic Planning and Design
Enfield Council
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Sent via email – localplan@enfield.gov.uk

Dear Sir/Madam,

London Borough of Enfield Draft Regulation 18 Local Plan Public Consultation – comments submitted on behalf of Crosstree Real Estate Partners LLP.

Introduction

This letter has been prepared on behalf of Crosstree Real Estate Partners LLP ('Crosstree') by Savills (UK) Limited (hereafter known as 'Savills') in response to the London Borough of Enfield Council's ('LBE') invitation to submit comments in respect of a public consultation on the Regulation 18 draft of the new Local Plan.

We welcome the opportunity to work in collaboration with LBE to bring forward the draft Local Plan, in line with Regulation 13 of the Town and Country Planning Act (Local Planning) (England) (2012). We acknowledge the Council's ambition to produce a document which has its residents' best interest and greatest quality of life in mind. The draft Local Plan gives guidelines on how it plans to achieve sustainable development, economic recovery from COVID-19 pandemic, town centre redevelopments, responding positively to the Government's agenda for growth and accords with the tests of 'soundness' as established in the National Planning Policy Framework ('NPPF') (2021), all while recognising the need to deliver housing in Enfield. Following review of the draft Local Plan, we don't think this goes far enough. We would like to see a more positive framework promoting redevelopment of Edmonton Green.

In 2018, Crosstree Real Estate Partners LLP purchased Edmonton Green Town Centre with the ambition of revitalising and reenergising the centre and enhancing and optimising the contribution made by an existing piece of the city that will promote long term investment in the area and help create a sustainable place. Until now, whilst enjoying significant strength as a local centre, efforts to bring forward a programme of renewal have stalled. The ambition to revitalise Edmonton Green is being brought forward through a masterplan for the town centre and a hybrid planning application was submitted in December 2020 (Reference: 20/04187/OUT) (hereafter known as 'the current submission'). The proposal has progressed over the medium term alongside a substantive programme of stakeholder engagement and this process has informed our decisions throughout the consultation period. Crosstree Real Estate Partners have been engaged and working with the LBE and a range of other stakeholders since Q4 2019 on the masterplan.



This application presents an exciting and significant opportunity to make better use of a well-connected, previously developed site, which could make a significant contribution to meeting the London Borough of Enfield's targets for growth. The existing Edmonton Green Shopping Centre, mostly built in the early 1970s, contains a mixture of retail, leisure and residential facilities, with a large shopping centre and bus station forming the publicly accessible areas of the site.

The application seeks to sustain a diverse town centre rooted in a cultured place, that would be recognised within the Borough as the hub for high-quality living, community, retail and enjoying significant investment characterised by a sustainable town centre and night-time economy. Up to 1,438 residential units, 41,773sqm of floorspace comprising retail, café, restaurants, hot food takeaways, pub and market, 5,000sqm of office, 4,000sqm of leisure and 4,400sqm of community. The proposed development for Edmonton Green will bring forward an exemplary and high-quality District Centre delivering significant benefits, including enhanced public realm, urban greening, covered market space and new high-quality housing, for residents and businesses of the Borough and indeed London. These representations are therefore made in the context of, and with reference to, the above detailed planning application. We would like the strategy set out in the development plan to positively plan for and enable the delivery of this vision.

We look forward to working with LBE on this matter and would welcome any 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. We note that as a Borough subject to a 'presumption in favour' that planning adequately for housing delivery over the plan period will be of particular importance and note that Edmonton Green has the potential to make a material contribution to these targets through the life of the plan.

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, town centres across the Borough are identified as 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 town centres 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 in town centres across the Borough to deliver much-needed housing and reconfigure town centres to ensure economic recovery and sustainability in the long run. We therefore ask that the Regulation 18 Plan continues to support existing town centres as places to which significant levels of development will be diverted.

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

Strategic Policy SP PL3: Edmonton Green

We support the broad ambitions of parts 1, 2, 3 and 4 of draft Policy SP PL3 in terms of delivering regeneration that responds positively to its unique context and characteristics, reinforcing its role as a district centre, contributing to creating a revitalised town centre by directing a significant amount of new development to the

district centre, intensifying the range of activities and uses to support existing and new communities, providing new street-based routes and a more diverse mix of commercial, community, cultural, leisure and night-time activities, and creating a sustainable evening and night-time economy. The current submission will capture these ambitions and deliver a significantly higher quantum of housing (circa 1,438 homes), a newly revitalised shopping centre and well-designed public realm.

However, for the reasons set out within the following comments, we consider that the draft policy's overall vision for the site could be stronger in terms of the Council's ambitions, the deliverability of which has been demonstrated in the current submission, which illustrates a ground-breaking regeneration scheme that will deliver a series of transformative changes to the site including a significantly increased quantum of housing, a new shopping centre with a Market Hall and attractive and legible public realm. Draft Policy SP PL3 as currently worded is not considered to sufficiently capture this capacity for significant beneficial change. The draft Policy should also recognise that delivery will be challenging and confirm that the Council will work positively with stakeholders and the landowner to ensure that development is deliverable in order that the benefits of investment can flow sooner rather than later for the communities who live here. Further comments on the policy are set out below.

With regard to part 6 of the policy, we note that this part expects proposals to contribute to removing the Fore Street and Church Street conservation areas from the Historic England register of Heritage at Risk and enhancing those at The Crescent and Montagu Road Cemeteries. We broadly support the principle of strengthening heritage assets and enhancing the conservation areas to reinforce the surrounding area's character and context, and our Masterplan deliberately responds to this urban context as a component of its place making strategy. However, as an identified opportunity sites within a town centre, the Plan should make clear its support for large scale high density development and note that positive regeneration can be compatible with the heritage agenda where carefully designed.

Regarding part 7 of the draft Policy, we note that in order for tall buildings to be considered acceptable in a given location, the policy requires that proposals for these buildings are proposed in locations identified as appropriate for tall buildings, as illustrated in Figure 7.4 of the draft Local Plan. Edmonton Green has been identified as an appropriate location for tall buildings in Figure 7.4, the principle of which we support.

However, the Figure specifies 69 metres as the maximum height appropriate for Edmonton Green, which we consider to be underestimated in terms of the site's capacity for high-density development. The rationale of this maximum building height is not clear in the draft Local Plan or LBE's evidence base, only that the maximum height has been calculated based on an assumption of a 3 metre floor to ceiling standard height for residential development. As noted above, Edmonton Green currently comprises 3no. 25-storey buildings, which are approximately 75 metres AOD and thus are taller than the proposed maximum height of 69 metres.

Indeed the site is well-connected by existing public transport infrastructure that supports high-density living. With particular regard to public transport, Edmonton Green is considered to be one of the most well connected part of the Borough and, in combination with its brownfield credentials (which the London Plan requires optimisation of), is considered to be an appropriate location for the one of the tallest and highest density mixed use developments in the Borough.

Further to this, the current submission contains a townscape assessment and details of pre-application discussions with LBE Officers concerning the design principles of tall buildings and the appropriateness of the proposed heights in Edmonton Green. In terms of the pre-application advice discussions relating to design and massing, the proposals have undergone significant design development following consultation with a range of

Officers and Stakeholders. The result of this process is an evidence and assessment-led design of exemplary standards that has garnered support for its tallest elements, located towards the centre of Edmonton Green.

A townscape assessment has also been submitted which demonstrates that the proposed tall buildings will not give rise to unacceptable impacts in relation to townscape and indeed in some instances will in fact deliver major beneficial townscape effects. It has been demonstrated that the proposed 30-storey buildings will generate substantial urban design benefits, including improved legibility and wayfinding through reinforcing the site's position at a point of townscape prominence, and the improvement in the visual quality of the site.

Given the above it can be concluded that in the absence of specific evidence to support the draft policy, the prescription of specific heights is inappropriate and rather should be set by a detailed assessment as part of planning applications and the associated design development that takes place during engagement with Officers prior to submission. Edmonton Green is capable of sustaining buildings of a height greater than that prescribed in Figure 7.4, which does not take into account the potential for high quality design solutions and significant public benefits to support heights greater than 69m. Further comments on draft Policy DM DE6 (tall buildings) are provided in the subsequent sections of this representation.

With respect to part 8, the draft Policy states that opportunities should be taken to deliver new and improved workspaces through the intensification of sites along with improving the quality of existing employment spaces. In this regard it should be noted that the Applicant for the current submission has advertised and targeted many potential office providers with a range of options, such as smaller units and discounted rates. However, in order to be able to let the office floorspace at St. James Chambers and Knights Chambers, the Applicant has had effectively 'give away' the spaces at extremely low rent levels in order to secure a tenant both prior and post COVID-19. It is therefore considered that the consolidation of office existing floorspace along with an element of re-providing replacement higher quality office floorspace, is in fact an appropriate alternative approach that is best suited to the area and office market. Accordingly, we suggest the following:

*"Proposals for new employment generating development should be concentrated within the district centre. This may include introducing a ~~wider range of job opportunities, and leisure and food and beverage opportunities~~ **diverse range of employment generating uses to sustain the place, diversify the centre and improve resilience.** Opportunities should also be taken to deliver new and improved workspaces through the intensification of sites and along with improving the quality of existing employment spaces, **subject to viability and identified market demand for either existing or new employment spaces.**"*

Part 9 seeks to ensure that the proposals at Edmonton Green contribute to enhancing the public realm to make walking and cycling safer and more accessible and attractive, which includes improvements between buildings, the shopping centre and railway line through the introduction of urban greening and the creation of lively street culture and a safe environment. In addition to these, improvements around Edmonton Green Station and creating a distinctive arrival point into the town centre with greater public transport and cycle access and wider links to Angel Edmonton and Meridian Water and the Lee Valley Regional Park are sought. We generally support the draft policy wording as the public realm strategy for the current submission is to be the catalyst for change and will include (but is not limited to) the delivery of new pavement along Fore Street, Smythe Close and the new Market Gardens, which will be accessible to all and connect up to the existing site of ASDA and the further phases of the Masterplan once developed. Moreover, new cycle parking and a two-way cycle lane through the Masterplan will be offered, thus increasing access to cycling across the site.

Part 10 of the policy states that:

“Infrastructure required to support sustainable development includes:

- a. the potential to remove the current roundabout and connect the war memorial island to the station or concourse to provide safer more direct connections and more useable open space;*
- b. improvements to bus services and connections to ensure good public transport access. The Council will also work with the TfL and others to upgrade access and capacity at Edmonton Green Station; and*
- c. the integration of sustainable urban drainage (SuDS) measures and urban greening into the public realm as well as buildings, to reduce flood risk, ensure a significant net gain in biodiversity and reduce the heat island effect. The Council will support the introduction of rain gardens, swales and other sustainable urban drainage features as well as opportunities to deculvert Salmons Brook, reinforcing the role of Edmonton Green as an important community asset for the Borough.”*

With regard to parts (a) and (b), we can see merit in the principle of peninsularisation of the roundabout and improvements to the bus station to enhance services for the public. Whilst the wording of the policy above is positive for the Masterplan (which includes improvements to the public realm connecting to the bus station at Edmonton Green), it is concluded from our initial analysis with Officers that there are delivery challenges related to parts (a) and (b). Given the primary objective is to begin to deliver the regeneration and associated benefits, and the existing challenges facing the delivery of parts (a) and (b) and, on the basis that neither parts (a) or (b) are required in order to deliver the wider strategic regeneration of Edmonton Green, we suggest that the draft policy wording is amended to provide the following flexibility:

“The Council will work with landowners, developers and Stakeholders to explore the following further infrastructure improvements where feasible: ~~Infrastructure required to support sustainable development includes:~~

- a. the potential to remove the current roundabout and connect the war memorial island to the station or concourse to provide safer more direct connections and more useable open space;*
- b. improvements to bus services and connections to ensure good public transport access. The Council will also work with the TfL and others to upgrade access and capacity at Edmonton Green Station; and*

These initiatives should not hold back the wider regeneration of the site.

In terms of part (c), we note the Council’s support for the integration of sustainable urban drainage measures and urban greening into the public realm as well as buildings and the introduction of rain gardens, swales and other sustainable urban drainage features. We also recognise the Council’s ambition to explore potential opportunities to deculvert parts of Salmons Brook.

The ambition of deculverting parts of Salmons Brook should only be progressed on a place by place basis where the benefits of doing so are considered to clearly outweigh the harmful impacts of doing so, in relation (but not limited) to scheme viability and wider town centre functionality (e.g. lost space for servicing, shopper desire lines).

The potential to deculvert Salmons Brook as part of the current submission was explored during pre-application discussions with Officers. It was demonstrated that deculverting Salmons Brook in its entirety across the masterplan site and its knock on effects in relation (but not limited to) building layouts, pedestrian movement, servicing and financial viability would have been harmful to the proposals and the ultimate aim of delivering town centre regeneration to the benefit of existing and future residents. The draft policy as currently worded should therefore be amended as per the following suggestions in order to ensure that future developments in Edmonton Green are not unduly constrained by the limitations presented by deculverting:

...

- c. *the integration of sustainable urban drainage (SuDS) measures and urban greening into the public realm as well as buildings, to reduce flood risk, ensure a significant net gain in biodiversity and reduce the heat island effect. The Council will support the introduction of rain gardens, swales and other sustainable urban drainage features as well as opportunities to deculvert Salmons Brook, reinforcing the role of Edmonton Green as an important community asset for the Borough. **The option of deculverting along parts of Salmons Brook will be assessed on a place by place basis to ensure that the benefits of deculverting are balanced against the need and ability to deliver town centre regeneration, including consideration of operational requirements for town centre uses. Alternative strategies will be considered where it has been demonstrated that deculverting is not feasible.***

Regarding part 12 of the draft Policy, which relates to the opportunities to enhance the environment around the railway arches, it should be noted that this depends on a deliverable solution including consideration of cost and landownership. Enhancement of the railway arches is not necessary in order to deliver significant regeneration and its associated benefits to residents within Edmonton Green town centre. Accordingly we suggest that the draft policy is amended to remove this reference entirely and instead address this ambition under a separate development management policy concerning railway arches within the borough.

Finally, we note that supporting paragraph 3.3.3 states that tall buildings in Edmonton are “*out of scale in comparison to the rest of the area but serve as useful landmarks for the district centre*”. Whilst it is correct to state that the existing tall buildings in Edmonton Green are of a town centre scale; the current draft policy wording suggests that the these existing tall buildings are inappropriate for the area, despite their being an adopted planning policy framework that promotes high-density living within the District Centres and areas of high PTAL (between 4-6). The Masterplan takes the opportunity to promote a framework that better integrates the existing tall buildings by providing a better cluster of buildings that transition to domestic scale in the appropriate areas of the site boundary. The proposed tall buildings have adopted a design-led approach, including rigorous Design Review Panel assessments, as set out in London Plan Policy D3. We consider that the draft policy and supporting text should be amended to actively encourage similar approaches for any forthcoming proposals at Edmonton Green and indeed to accord with the currently submitted Masterplan. As such, we propose the amendments below:

*“Some of the most significant buildings in Edmonton are the tall buildings that rise out of the shopping centre (Grampian, Mendip and Pennine House). **These set a ‘town centre’ scale in comparison at the heart of this site to the rest of the area but and serve as useful landmarks for the district centre. Design-led improvements to these tall buildings and the skyline of the district centre through the provision of a better cluster of new tall buildings and intensification will be supported.**”*

Policy DM DE6: Tall buildings

As discussed above regarding part 7 of draft Strategic Policy SP PL3, draft Policy DM DE6 discusses the appropriateness of tall buildings in certain locations within the borough. Part 1 of the draft Policy makes reference to Figure 7.3 which sets out indicative maximum heights for tall buildings. Figure 7.3 is provided below for reference:

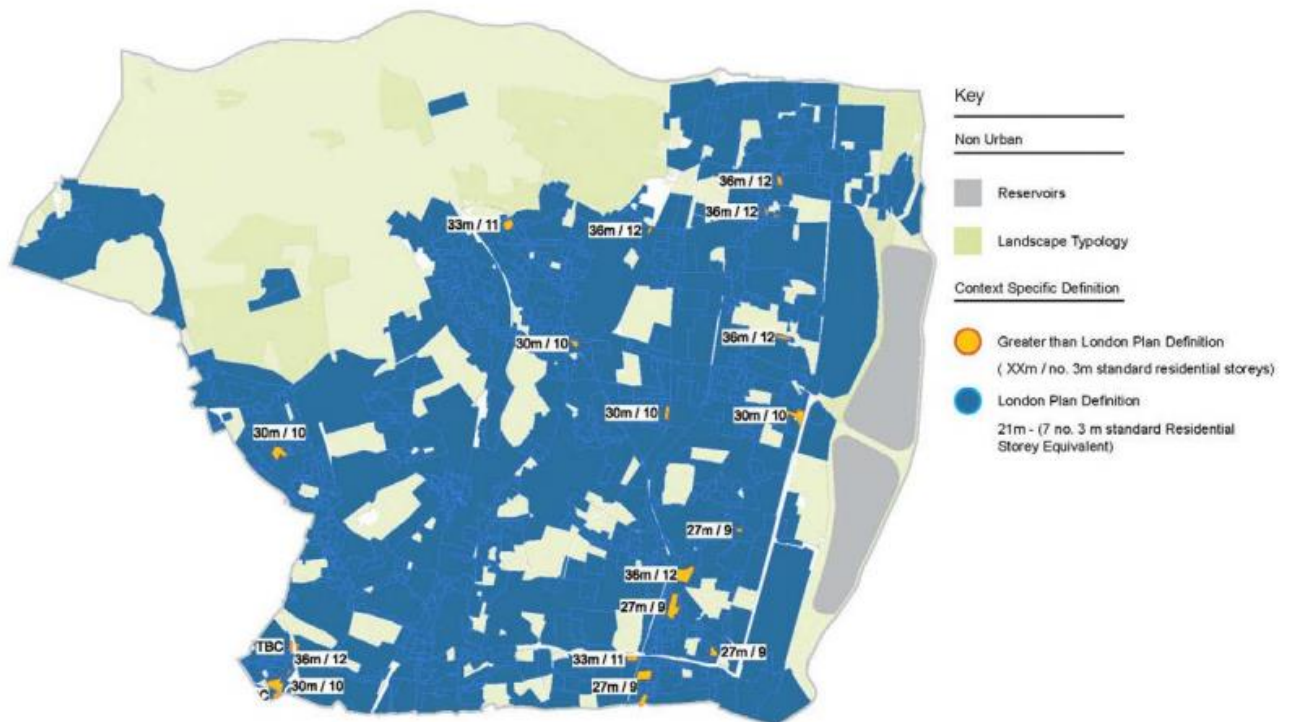


Figure 7.3: Definition of tall buildings

Part 1 also supports the principle of tall buildings in ‘appropriate locations’, which are illustrated in Figure 7.4, provided below:

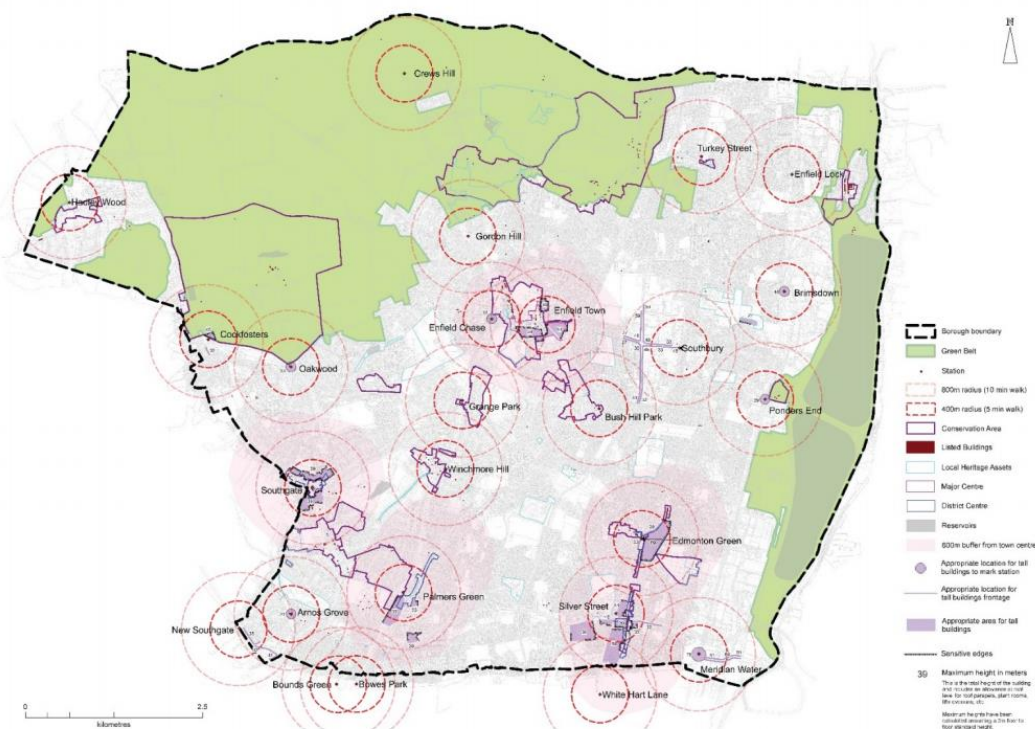


Figure 7.4: Appropriate locations for tall buildings

We support the Council’s identification of Edmonton Green Town Centre as an appropriate area for tall buildings in principle as set out in Figure 7.4. This will assist in achieving optimised development potential around this sustainable town centre location. This approach is also consistent with London Plan Policy D3 which seeks to ensure that site capacity is optimised through a design-led approach, particularly in well-connected locations. Edmonton Green is also identified as a District Centre with potential for significant residential growth as per the London Plan’s Town Centre Network and is therefore an appropriate location for growth. Notwithstanding this, we note from the draft Policy that if the proposal is in an appropriate location for tall buildings, it will be assessed against the indicative maximum heights of buildings identified in Figure 7.3 (see above). Furthermore, part 1(b) of the Policy emphasises that locations marked as potentially appropriate for tall buildings “do not allow for a blanket height across the area. Height will only be supported as part of a coherent strategy”.

In the absence of any site specific evidence, including detailed design and massing options and assessment of public benefits that can be delivered as part of those various options, we do not support the current approach to indicative maximum building heights in Edmonton Green. Indicative maximum heights should only be adopted where the Borough can provide the relevant evidence to support them. Moreover, we 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 deliver as many public benefits as possible and decisions can be made on a case by case basis. This is because prescriptively indicating appropriate building heights in the absence of the above tests and discussions may preclude the design solutions necessary to facilitate the comprehensive public benefits that large-scale redevelopment schemes can deliver.

The evidence and tests required in order to identify the appropriate height at Edmonton Green has been provided and undertaken as part of the current Masterplan submission. That submission demonstrates that building heights of 30 storeys are appropriate, reducing in height towards the more suburban context particularly to the north of the site. Detailed and comparable evidence to the contrary has not been provided as part of the draft Local Plan evidence base. Accordingly the indicative maximum height for Edmonton Green should be reframed to reflect the Masterplan submission as discussed in the previous section.

Strategic Policy SS1: Spatial Strategy & Strategic Policy SP H1: Housing development sites

In terms of housing delivery, LBE have failed to meet their Housing Delivery Test targets in 2020 and only delivered 1,314 new homes out of 2,328 required homes in the period between 2017-2020 which is equivalent to 44% below target. As a result, the Borough now falls into the “*presumption in favour of sustainable development*” category. Draft Strategic Policy SS1 seeks to 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 – through 7 spatial strategy options set out in Table 2.2.

In view of the Housing Delivery Test results, it is considered that a strong growth agenda should be the main target of the Regulation 18 Local Plan 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 approach centred around intensification and building on brownfield land, town centres and district centres should be the primary route to meeting the needs of an expanding population.

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. This target is already out of date and 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 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 allocation of urban areas such as town centres and district centres, particularly Edmonton Green Town Centre, ought to be sequentially preferable to the release of Green Belt.

Strategic Policy SP H1 states that new homes will be directed to a number of locations, including District Centres, which we support. The target of 25,000 new dwellings has been set for the plan period up to 2039, which equates to 1,250 homes per year, and Edmonton Green Shopping Centre (SA13) has been identified as a location with an estimated capacity of 1,173 new homes. However, we note that the Government’s publication of the new Standard Methodology for calculating housing need which applies a cities and urban centre uplift for cities including London, demonstrates that we can reasonably anticipate an increase to Enfield’s housing targets within the plan period. This new Standard Methodology will increase the Borough’s housing target to over 4,000 units per annum from its currently proposed 1,250 units per annum. Therefore, we consider that the

overall target of 25,000 is not appropriate for the Borough and should be higher to accommodate the growing local needs for housing.

A hybrid planning application containing a masterplan for the comprehensive regeneration of Edmonton Green has been submitted. The masterplan is supported by a range of detailed assessments including an Environmental Impact Assessment, all of which concludes that the subject site (and therefore Edmonton Green town centre), is capable of delivering at least 1,400 homes over the plan period. As Enfield is currently in the “*presumption in favour of sustainable development*” category, it is considered that a proposal such as the Edmonton Green masterplan that is capable of delivering large-scale development that can not only transform an underutilised brownfield site and town centre, but also alleviate pressures elsewhere in the borough, should be emphasised in the draft Local Plan. Accordingly, the currently drafted estimated capacity of 1,173 homes should be increased to align with the detailed evidence and analysis submitted as part of the current masterplan.

We also note that 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. 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 fails to anticipate this level of need will not pass the relevant tests at Examination in Public.

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 recognise the Council’s vision of making Enfield a sustainable place for the long run as outlined in LBE’s Enfield Climate Action Plan (2020). Notwithstanding, this draft Policy is not consistent with London Plan Policy SI 2 with respect to minimising greenhouse gas emissions, particularly in part C where it notes that if it is clearly demonstrated that the zero-carbon target cannot be fully achieved on-site, any shortfall may be mitigated as a cash in lieu payment. In view of this, we consider that this policy can be made more consistent with London Plan Policy SI 2 subject to the following amendments:

*“All major residential developments of ten or more dwellings and non-residential development of 500sqm GIA or more ~~will be~~ **should be** net-zero carbon **as part of the Council’s wider vision concerning climate action**. A cash in lieu contribution to meet net-zero carbon **or setting up off-site zero-carbon targets (provided that an alternative proposal is identified and delivery is certain)** 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.”*

Whilst we are generally supportive of the draft policy, it is important that the Council recognises that this is a cost on development and to be viable, scheme's such as the Edmonton Green Masterplan will need to be carefully designed and considered or other benefits of the scheme may need to be scaled back to achieve the ambition of the draft Policy.

Policy DM SE8: Managing flood risk & Policy DM SE9: Protection and improvement of watercourses

Part 6 of draft Policy DE SE8 states that:

“Developments in proximity to culverts and watercourses must have a minimum of 8 metre set back (unless otherwise agreed with the Environment Agency, LLFA, Thames Water and the Canal and River Trust) with a means to facilitate river naturalisation, ecological enhancements and de-culverting, which improves maintenance of land drainage, enhances local amenity and improves the ecological function of river corridors.”

We consider the wording to be overly prescriptive and not flexible enough to account for site constraints that may prevent the inclusion of an 8m set back in every circumstance. The wording of Part 6 is not consistent with the flexibility of Part C of London Plan Policy SI 12 which does not specify the minimum of 8 metre set back for developments in proximity to watercourses, stating that development proposals should ensure that flood risk is minimised and mitigated, and this should include, where possible, *“making space for water and aiming for development to be set back from the banks of watercourses”*.

Moreover we note that draft Policy DM SE9 Part 1(a) states that the set back from the watercourse will be expected to be *“adequate”* and *“the distance applied will be determined having regard to the nature of the development and the type of watercourse subject to further consultation with the LLFA, Environment Agency, Thames Water and the Canals & River Trust”*. Accordingly, draft Policy SE9 is worded such that there appears to be a degree of flexibility with regard to the degree of set back required (contrary to the prescriptive 8m distance in draft Policy SE8).

We consider that an 8m set back distance may normally be applied, but that in urban areas a ‘balanced’ approach should be adopted with proposals considered on a case by case basis. The draft policy wording should also be amended such that it allows for this flexible approach in terms of development proposals providing 8m set back distances in some areas of the proposal and not others, again subject to site constraints and feasibility of the wider development proposal. Indeed, an 8m set back distance may not always be required to allow for maintenance access along the entirety of a waterway and should therefore be subject to consultation with the Environment Agency again on a case by case basis, rather than prescribed by planning policy.

Accordingly, we propose the following amendments to draft Policy DM SE8:

*“Developments in proximity to culverts and watercourses ~~must have~~ **should maintain a minimum of 8 metre an adequate set back as determined on a case by case basis and in discussion with the relevant Stakeholders, (unless otherwise agreed with the Environment Agency, LLFA, Thames Water and the Canal and River Trust) with a means, **where feasible,** to facilitate river naturalisation, ecological enhancements and de-culverting, **and which should seek to** improves maintenance of land drainage, enhances local amenity and improves the ecological function of river corridors.”***

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 development's economics and financial viability, including any particular costs associated with it when determining the acceptable amount of affordable housing for the site. This approach is consistent with London Plan Policy H5, which requires a financial viability assessment 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 **on a case by case basis.**”*

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), provided below:

Table 1: Dwelling size priorities

	Studio/bedsit	One-bedroom	Two-bedrooms	Three-bedrooms	Four-bedrooms or more
Social/affordable rented	Low priority	Medium priority	High priority	High priority	Low priority
Intermediate	Low priority	High priority	High priority	Medium priority	Low priority
Market	Low priority	Low priority	Medium priority	High priority	High priority

However, we would like to comment that these priorities may not always be achievable across all sites due to their context and site constraints. In some instances it may also be desirable to deviate from the above prescribed dwelling mix in order to facilitate the delivery of other benefits associated with a proposal that may not otherwise be deliverable due to viability (for example), should the above prescribed mix be rigidly applied i.e. through the planning balance exercise.

We note that 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.*” This is not specified within the draft Policy text however and, it is considered that the above text should be amended further. We suggest that this paragraph is embedded in the policy and amended to state:

“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, or where other public benefits may be delivered instead as a result of providing an alternative dwelling mix and that are considered to be acceptable on balance”

Policy DM H7: Build to rent

We support the introduction of Build to Rent (‘BTR’) in the draft Local Plan which acknowledges this housing product as a new option for major developments and offers a lifestyle option for people who potentially look to rent in the Borough.

Policy DM TC4: Markets

We generally support the notion of improving existing markets and public realm and not reducing the number of pitches. We also note that the policy supports proposals affecting existing markets if existing traders are given the opportunity to take up pitches at same or lower rents, which we consider ambitious but potentially challenging to achieve as it does not take into account the viability of preserving rental prices whilst delivering economic improvements to the development site post completion. We recognise the importance of retaining existing traders and preserving their rental prices to preserve their place in the market.

However, the requirement of preserving or lowering rent does not align with London Plan Policy E9, which supports a “*successful, competitive and diverse retail sector*” and vitality in the markets. Requiring developers to preserve or lower rents and removing their ability to respond to market conditions, is not considered to be an economically sustainable means of managing retail assets. It is also considered to be outside of the remit of planning policy, rather this is a matter that is governed by landlord and tenant agreements and typically enshrined in law not planning policy.

Notwithstanding the above, the current wording of the policy risks being overly prescriptive for potential developers who could come forward, and it is vital that the wording of the policy with respect to providing

opportunities for existing traders to continue trading in the market clearly supports the Council's ambition to deliver an enhanced environment for traders to flourish. Therefore, the suggested amendments are provided below:

"Proposals affecting existing markets will ~~only~~ be supported where:

- a) they result in a qualitative improvement to the market and public realm;*
- b) the number of pitches will not be reduced; and*
- c) existing traders have the opportunity to take up pitches ~~at the same or lower rents~~. **A strategy for existing traders to take up pitches should be secured as part of any planning application affecting existing markets.**"*

Policy DM CL6: Protecting and attracting public houses

We note the ambition of protecting public houses due to their community, social and economic role in local communities. We would like to comment on part 3 of draft Policy DM CL6 in particular:

"Proposals involving the replacement or re-provision of a public house must ensure the replacement facility is of comparable character and quality as the existing public house and has an appropriate amount and configuration of floorspace to enable the continued viability of the public house."

We broadly support the concept of ensuring the replacement or re-provision of a public house is of comparable character and quality as the existing public house and has an appropriate amount and configuration of floorspace; however, we question whether it is feasible to make it a requirement that the replacement or re-provision of the public house must be of comparable character and quality based on its existing context, when the existing quality of the public house has an opportunity to be further improved and where a regeneration scheme could improve the quality of the wider site within which the public house is situated. It may therefore not always be desirable to replicate the existing facilities and as currently worded, draft Policy DM CL6 does not allow for potential improvements in this regard. We would accordingly suggest the following amendments:

*"Proposals involving the replacement or re-provision of a public house ~~must~~ **should** ensure the replacement facility is of comparable character and quality as the existing public house, **or deliver improvements in this regard where feasible and appropriate**, and has an appropriate amount and configuration of floorspace to enable the continued viability of the public house."*

PL3: Edmonton Green – Site Allocations

Draft Site Allocation SA13 comprises the Edmonton Green Shopping Centre, a multi-storey car park of over 1,000 spaces, leisure centre, covered market, hotel and existing homes. The site is intended to be the focus of intensification in the Edmonton area, particularly in terms of housing delivery. Therefore, we support the Council's allocation of Edmonton Green as a site for mixed-use redevelopment with compatible main town centre, commercial and residential uses, to support the regeneration efforts to revitalise the town centre and promote long-term investment in the area.

Notwithstanding the above, we consider that the draft allocation's specified land use requirements for the site are too vague and could be made clearer in terms of the Council's vision for the site. Accordingly, we suggest that the Council clarifies that 'there is a mixed-used comprehensive masterplan that can be delivered in phases'. Additionally, in providing further detail LBE should also recognise that the successful delivery of a

comprehensive mixed use redevelopment in this location is finely balanced with regard to economics and development viability. It is necessary to ensure that the draft allocation fully accounts for this and balances residential, non-residential and other matters such as public realm improvements accordingly. This balance should be based on evidence and we would suggest that Officers refer to the Financial Viability Appraisal submitted as part of the Masterplan proposals for guidance.

We also note that the site has been allocated a target of 1,173 new dwellings. In view of the new Standard Methodology and anticipated increases in Enfield's housing targets over the plan period, we consider that there is merit in allocating a higher target of new dwellings for the site to allow optimisation of the site's capacity for growth. Indeed, as previously noted, the current submission is proposing to deliver 1,438 new homes as the site comprises brownfield land, is well-connected by existing infrastructure and is located within a District Centre, thus supporting high-density living and significant housing delivery. This indicates that the site has capacity for the delivery of a higher number of new homes than the proposed figure of 1,173.

Conclusion

Having reviewed the draft Regulation 18 Local Plan, we have concluded that there are a number of issues with the proposed growth strategy and the vision for Edmonton Green Town Centre 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 take the opportunity to set a higher housing target for existing town centres and district centres; and
- Failure to demonstrate the evidence for the indicative maximum heights in each identified location suitable for tall buildings.

Principally, we wish to emphasise the need for a forward-looking document which guides the progress of Enfield and its growth strategy, Edmonton Green Town Centre's future, the delivery of much-needed housing and, meeting contemporary and future community and market demands.

The Edmonton Green Masterplan 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 on the 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. We look forward to continuing to work with officers to further refine the draft 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,

