



Dear Sir/Madam,

REPRESENTATIONS TO THE REGULATION 18 ENFIELD LOCAL PLAN (2021)

We write on behalf of our client, *Social Housing Plus – Fore Street Limited* (hereafter referred to as “SHP”), to submit representations to the Regulation 18 Draft New Enfield Local Plan (June 2021)

This letter outlines several key comments and observations which we would like to record in relation to the draft Plan. The Council will be aware that SHP have a live planning application (ref- 20/01742/FUL) at 50-56 Fore Street (hereafter referred to as “The Site”).

We are fully supportive of the objectives and ambition of the Plan and of Enfield Council’s (EC) overarching vision to strengthen the borough’s strategic role as a green lung of London, securing the new jobs and affordable homes that will allow the diverse range of communities across the borough to thrive.

We welcome the guiding principles set out in the draft plan which outline the key objectives of EC’s spatial strategy. It supports high-quality growth through the delivery of housing supported by jobs and community facilities to address spatial disparities and to deliver better outcomes for all residents of the borough.

The below paragraphs address specific policies within the Regulation 18 draft of the emerging Local Plan. The amendments are shown through striking through text with the insertion of new text in italics.

Strategic Policy SP PL4: Angel Edmonton

SHP welcomes the designation of Angel Edmonton as a *Place Making Area*. Draft Policy PL4 supports the delivery of new community facilities and spaces for small businesses within the

area and seeks developments to *contribute to creating a thriving mixed-use place offering a range of housing typologies*, including dense forms of residential development. The SHP proposals at Fore Street actively seek to meet this vision.

Policy PL4 goes on to state that developments should create markers for intuitive wayfinding on Fore Street. At 18 storeys, the proposed tower will act as a marker along Fore Street, providing a visual indicator to pedestrians that they are entering a town centre. The proposals accord with the vision set out in paragraph 3.3.4 to revitalise the high street through the delivery of active uses on Fore Street. The requirement set out in paragraph 3.4.7 to address the relatively high-crime rates is addressed through the delivery of active street frontages with a varied mix of uses which will provide passive street supervision throughout the day and night.

However, we suggest some amendments are made to draft policy, as set out below.

Part 2 of the policy states that developments *'must provide new spaces for small businesses, culture and community uses.'* The current wording has an absolute requirement for developments to provide these spaces and doesn't adequately reflect the potential constraints of existing land uses and the physical form of sites. We request that 'must' is replaced with 'should' which provides the necessary flexibility to reflect individual site circumstances.

Part 3- We would suggest this is changed to:

'contribute to creating a thriving mixed-use place offering a range of housing typologies, which may include dense forms of residential development. Development along the high street should reinforce and create a coherent route along Fore Street. Proposals should also consider and respond to elsewhere—must respect the predominantly lower-rise character of the area.

Tall buildings will only be accepted in appropriate locations as set out in Policy DM DE6 Tall buildings and Figure 7.4 (and any updating successor).'

Draft Policy DM BG8- Urban Greening and Biophilic Principles

Whilst SCP supports the objectives of policy, the requirement to exceed the UGF targets in the London Plan needs to be re-considered. The London Plan sets out a UGF target rather than an absolute requirement. In practice it is frequently extremely challenging for sites to meet the current targets rather than exceed them. Draft policy should recognise the London Plan UGF targets and require developments to consider the ability to green a site. This should sit alongside a recognition of the overall improvements to the UGF which a scheme is delivering. Draft policy needs flexibility built into it which recognises the individual circumstances of a site.

Draft Policy DMBG9- Allotments and Community Food Production

The current draft expects proposals to include measures to increase or promote food production (including growing spaces/roof spaces etc). Given the number of competing

factors around site landscaping (including playspace, cycle parking, resident's amenity areas) in practice this is unlikely to be achievable unless you are dealing with large masterplan sites which have the space to consider this policy. Rather than 'expect' the text should be updated to 'encouraged'.

Strategic Policy SP SS1: Spatial Strategy

SHP welcomes the Borough's overarching spatial strategy and shares the ambition to provide for sustainable growth and the delivery of significant levels of high quality, well designed housing (25,000 new homes up to 2039). In particular, the recognition of Angel Edmonton as one of the key foci for the delivery of high-quality growth is strongly supported.

It is noted that the Borough has identified the *medium growth 1* option as the preferred spatial strategy option. The emphasis on delivering 25,000 homes within the seven identified urban placemaking areas is strongly supported. However, the Plan recognises that *medium growth 1* option is likely not to meet the Borough's housing requirement in their entirety. While the overarching strategy set out in this option is supported, it is noted that the *High Growth* option would achieve a greater delivery of housing by further embracing tall buildings. SHP encourages the Council to explore the possibility of maintaining the general strategy direction of *medium growth 1* option while integrating the tall buildings policies of the *High Growth* option, to achieve a balanced, sustainable development which maximises the Borough's housing delivery potential.

Policy DM DE6: Tall Buildings

SHP welcomes the Borough's proactive approach to tall buildings in suitable locations. Tall buildings have played a vital role in the delivery of high-quality housing across London. The delivery of high-quality tall buildings in appropriate locations within Enfield will help the Council to achieve their overarching visions for the Borough. However, the draft Local Plan at Figure 7.4, currently excludes SHP's site from part of Fore Street as being suitable for tall buildings. This is despite the area immediately adjacent being identified as suitable for buildings of circa 39 storeys and given the current planning application on the site for a tall building. This needs to be reconsidered.

With the submission of the current planning application, this location has been rigorously assessed as a part of the application process and is a suitable location for a tall building. Regard should be given to the changing nature of the surrounding context, with large-scale developments such as the Joyce and Snell's estate regeneration coming forward, taller buildings at this location are not likely to appear out of context or inappropriate in the future. Indeed, there are already tall buildings within the area.

In London there are many examples of successful tall buildings (existing and proposed) within, and adjacent to sensitive heritage assets - listed buildings, locally listed buildings, conservation areas, registered parks, scheduled monuments and world heritage sites. It is recognised that not all historic assets and their settings are equally sensitive. This section of

the Fore Street Conservation Area (Fore Street CA) is not particularly sensitive to change within its setting.

Existing development in the proximity of the site is mixed in both form and quality – traditional 2 – 3 storey houses on streets and large slab block and towers within open setting – and does not have a strong sense of place. However, the proposals for Fore Street will act to provide that sense of place and create significant regeneration benefits.

The proposals for the Site respond to the surrounding context and are not considered to cause harm to the Fore Street CA. The Site has a high level of public transport accessibility, being PTAL 5, and is within the Angel Edmonton District Centre Zone and Upper Edmonton Opportunity Area which already contains clusters of tall buildings. All these factors point to the Site being acceptable in principle for a tall building.

SHP encourages the borough to fully unlock the potential that tall buildings have by giving significant weight to the community benefits that come with tall buildings (including the delivery of affordable housing) when assessing development proposals.

Draft Strategic Policy SP PL4 sets out the vision for Angel Edmonton which recognises the area will likely include dense forms of residential development. This is reinforced by paragraph 3.4.6 which explains that alongside the estate regeneration schemes there is likely to be a significant uplift in proposed heights and densities. Moreover, it states that *'Given the existence of existing tall buildings, the mixed-use nature of the high street, and the strategic location on Fore Street which serves as a main route between other important destinations and given the railway station this is an appropriate location for some tall buildings to assist with housing delivery.'*

Given the above, the area identified as suitable for a tall building needs to be amended to include 50-56 Fore Street as part of the next draft of the Local Plan.

Draft Policy DM DE10- Conserving and Enhancing Heritage Assets

Parts 1 and 3 of the draft policy should be combined to better reflect the National Planning Policy Framework (NPPF). This would allow the consideration of impact on a heritage asset and the benefits a scheme would deliver. At the moment this important consideration is dealt with separately within draft policy.

Draft Policy DM DE13- Housing Standards and Design

The draft policy states that residential development will only be supported there it preserves the amenity of existing and new occupants in terms of daylight/sunlight/outlook etc. Whilst draft policy explains regard will be had to best practice guidance, the draft policy doesn't recognise the frequent issues which design teams need to consider and balance in developing proposals for sites in built up areas. In addition, parts 2 and 3 are seeking to set very prescriptive design standards. Draft policy should be amended to allow discussions around the form of development to take place as part of the pre-application and application process

which allows the individual consideration of sites and their unique constraints and opportunities.

Site Allocation SA16 50-56 Fore Street

We welcome the Site's allocation within the draft Local Plan. This recognises the important contribution the Site can play in meeting the Council's overall objectives for the new Local Plan.

SHP submitted formal representations to the Calls for Sites consultation in February 2021. This indicated the Site had capacity to accommodate circa 120 residential dwellings together with commercial floorspace. Therefore, the current estimated site capacity of 68 homes as set out within the draft Local Plan significantly underestimates the Site's capacity.

The Site is of course subject to a current planning application which proposes 114 residential units along with commercial floorspace with the ability to retain the pub. The submission of the planning application followed extensive pre-application engagement with Enfield's Planning and Design and Conservation teams and a 12-month design evolution process prior to submission, as well as detailed engagement with the GLA. Following a significant engagement period, it was concluded that this Site is suitable for significant development.

The Site is suitable for substantial development and suitable for a tall building. The rationale for the proposed development quantum is outlined below:

- There is a pressing need for more homes within the Borough, especially affordable housing;
- The NPPF and the London Plan requires the use of land to be optimised;
- The Site is within a District Centre;
- The Site is within an Opportunity Area;
- As set out in the Fore Street Conservation Area Appraisal, the Site is located at a 'Focal Point', with a 'strongly defined gateway';
- The Site has an excellent PTAL level of 5;
- There are several tall buildings in the near vicinity. The Fore Street Conservation Area Appraisal acknowledges tall buildings are visible along Fore Street, being an established part of that setting;
- Tall buildings are planned on the adjacent Joyce and Snell's site as part of the comprehensive estate regeneration scheme;
- The submitted planning application scheme will contribute to the redevelopment of a significantly degraded area and act as a further catalyst to the regeneration which has already begun.

SHP therefore request the site allocation is updated to reflect the true potential of the Site, with the number of potential homes increased to circa 120 homes.

The site allocation also deals with heritage considerations. This gives a draft heritage consideration of 'amber'. We would suggest the 'amber' allocation is removed and instead the draft allocation recognises the Site is located adjacent to the Fore Street Conservation Area and designated and non-designated heritage assets. We consider the location is of low sensitivity but with proposals needing to consider the setting of the conservation area and heritage assets.

We trust that our representations will be fully considered and taken into account in the preparation of the draft Local Plan. If you have any questions or comments, please do not hesitate to contact Tom Sweetman or Ben Murphy at this office.

Yours faithfully,