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Quod

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# Enfield Local Plan Reg 18 – Representations by DTZi

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13<sup>TH</sup> SEPTEMBER 2021

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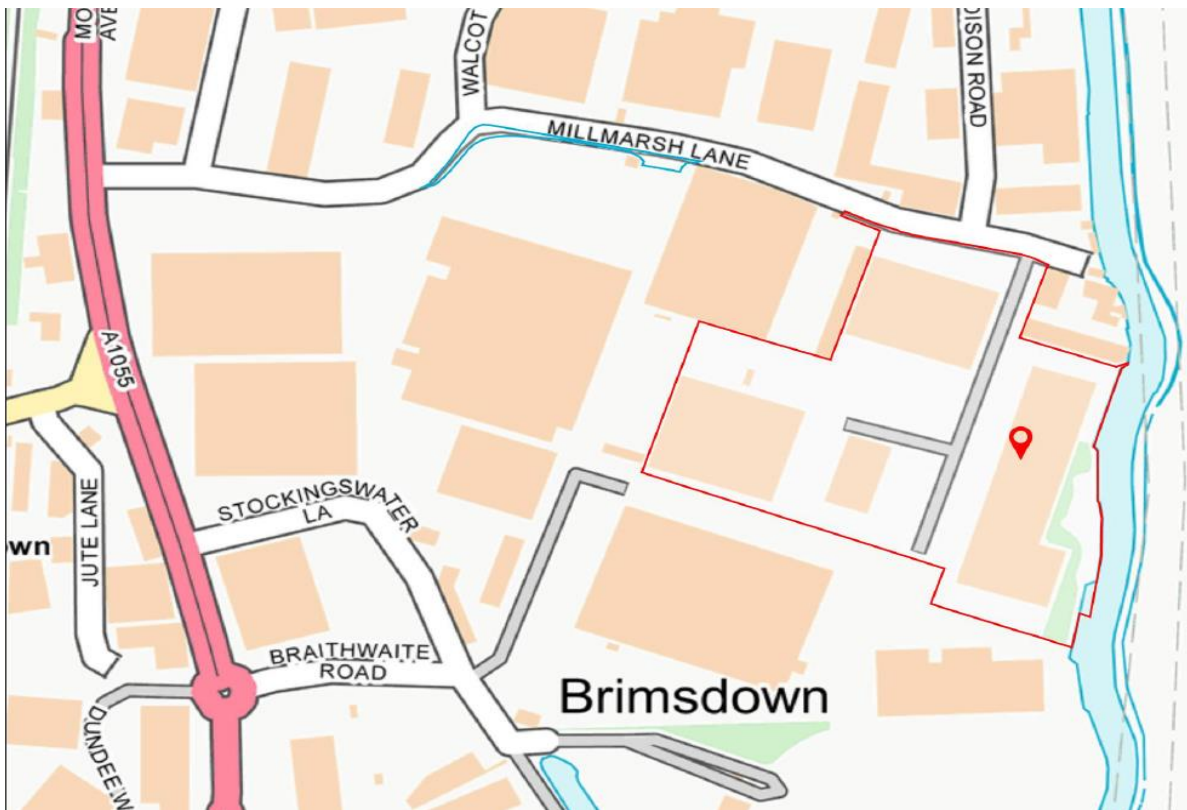
# 1 Introduction

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- 1.1 Quod is instructed by our client DTZi (c/o Beegas Nominees Limited) to submit representation to the Enfield Local Plan: Main issues and preferred approaches (2021) (**“Regulation 18”**).

## The Site

- 1.2 On behalf of Beegas Nominees Limited, DTZi manage land to the south of Millmarsh Lane, Brimsdown Industrial Estate (**“the Site”**), a 5-hectare area of industrial land. DTZi’s land interests are detailed below at **Figure 1**.



**Figure 1 - Land Ownership Boundary**

- 1.3 To the north of the Site runs Millmarsh Lane with industrial units beyond. The southern and western boundaries also adjoin several industrial landholdings that form part of the wider Brimsdown Industrial Estate. To the east the Site is bound by the River Lea Navigation Canal and King George Reservoir.
- 1.4 Local bus services are available from Mollison Avenue with train services into London Liverpool Street available from Brimsdown Railway Station, which are both within 500m of the Site to the west. Brimsdown Railway Station is identified as a future Crossrail 2 station. In the instance that funding for Crossrail 2 was made available and the infrastructure delivered, it is expected that the public transport accessibility for the area would improve.
- 1.5 The site currently comprises approximately 22,000sqm of logistic and industrial (Use Class B2 and B8) floorspace contained within several large, warehousing units with areas of vehicle

hardstanding throughout. Vehicular and pedestrian access to the site is facilitated via Millmarsh Lane, which connects the site to Mollison Avenue (A1055) to the west.

- 1.6 The Site is identified within the adopted Local Plan as a Preferred Industrial Location (PIL/SIL). The Site represents approximately 4% of the 116ha allocation at Brimsdown Industrial Estate.

## Call for Site Representations

- 1.7 On behalf of DTZi, Quod submitted representations in February 2021 at the Call for Sites review stage.
- 1.8 Quod identified two options for the potential redevelopment of the Site, which will both help serve the future development requirements of Enfield Council and the sub-region.
- 1.9 **Option 1:** retention of the existing use (industrial, warehouse and logistics) with further consideration for optimisation and intensification of these uses to deliver enhanced industrial capacity. The site already makes a significant contribution to London's industrial land requirement, as exhibited through its PIL/SIL designation, and it is considered that through intensification, there could be scope for an additional 10,000sqm of industrial floorspace, subject to detailed design considerations. This would promote higher levels of employment and economic benefits for the borough, whilst allowing Brimsdown Industrial Estate to further its status as a premier industrial location across London.
- 1.10 **Option 2:** comprehensive redevelopment of the site as part of a strategic co-location strategy and Masterplan for the wider area, delivering a new neighbourhood comprising of a high-density, residential-led mixed-use development. This option would require the allocation of the site for redevelopment within the future Enfield Local Plan review, which could occur through de-allocation of the SIL or variation of the existing SIL / PIL policy to permit co-location of uses including residential.
- 1.11 In accordance with the adopted London Plan (2021), a comprehensive masterplan could include the intensification of uses on site in a manner compatible with other more sensitive uses, or the relocation of the existing industrial uses to an alternative location. We anticipate the new neighbourhood development would include a range of uses including residential (Class C3), commercial/retail (Class E, sui generis) and community/leisure (Class F, sui generis) delivered alongside industrial (Class B2 and B8).
- 1.12 The future redevelopment of the site will need to ensure that the existing industrial floorspace can successfully be consolidated/intensified on site and must be designed in a way that future industrial uses are compatible in consideration of the London Plan 'agent of change' principle.
- 1.13 Option 2 represented a positive approach to plan making reflecting the objectives of the North Enfield Area Action Plan (2016), which forms part of the Enfield Local Plan. This document continues to promote Brimsdown Industrial Estate as a strategic industrial/employment location but also considers the opportunities presented by enhancement of the West Anglia Mainline service and Crossrail 2, which would support the regeneration of areas in proximity to the existing stations at Ponders End, Brimsdown and Enfield Lock.
- 1.14 The Upper Lee Valley Opportunity Area Planning Framework was formally adopted by the Mayor of London in 2013. The OAP includes large parts of Enfield, Waltham Forest, Hackney

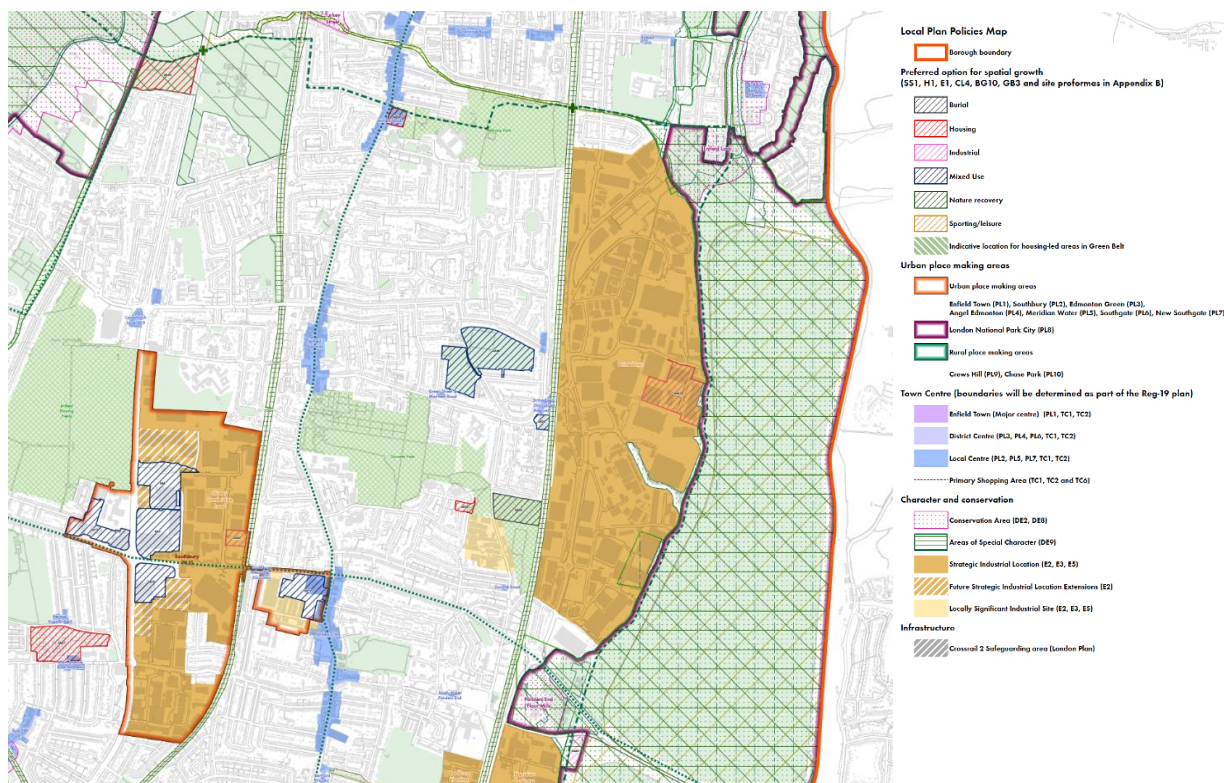
and Haringey within its boundary, and importantly includes the entirety of the Brimsdown Industrial Estate.

- 1.15 The Upper Lee Valley Opportunity Area (2013) is expected to deliver by 2031: 20,100 new homes, 15,000 new jobs, a Lee Valley Heat Network, significant investment, and improvement to transport infrastructure (including West Anglia Main Line), and an accessible network of green and blue spaces.
- 1.16 Within the Upper Lee Valley Opportunity Area Framework, Brimsdown Industrial Estate continues to be promoted as a Strategic Industrial Locations and shall be the focus of a retention and intensification of industrial land to create new employment. The opportunities presented by Crossrail 2 as a catalyst for the regeneration and intensification of land uses in the Upper Lee Valley are acknowledged with the OAPF Noting that Crossrail 2 will improve public transport accessibility in the area and with it, the viability of dense development around the Upper Lee Valley corridor.
- 1.17 The December 2018 Enfield (Regulation 18) “Issues and Options” Local Plan identifies the site within the wider Brimsdown Industrial Estate SIL/PIL designation. The site is also included within the ‘Eastern Corridor’, an area of land which is expected to be unlocked and benefit from accelerated regeneration as a result of Crossrail 2 delivery.



## 2 Site Allocation SA49

- 2.1 The Council proposes to allocate the Site as Site Allocation SA49, as part of the wider strategic industrial location (SIL) allocation (E2, E3, E5), as detailed below at Figure 2.



**Figure 2 - Extract from Draft Local Plan Proposals Map**

- 2.2 The Proposals Map key is ambiguous, and we would suggest that the colour code used for SA49 be changed. It is unclear, using the proposals map alone, whether the site is allocated for housing (red hatching) or industrial (pink hatching). We note that whilst there are policies associated with the SIL allocation, there are no policies associated with the industrial allocation (pink hatching).
- 2.3 In our opinion, it is unusual for a site to be allocated for industrial, when it already sits within a SIL designation. We recognise that draft Policy E1 (Employment and Growth) Part 3, Table 9.1 sets out sites that are allocated for employment-led development and defined on the Policies Map; albeit as the policy already seeks intensified development of industrial, logistics and related functions in existing employment areas, we do not agree that the Site requires an additional allocation.
- 2.4 We recognise that the Council are using the additional employment capacities within Table 9.1 to inform the draft Policy Options set out in Table 9.2, but we do not consider that the capacity which informs these options (with Green Belt allocations (98% of needs) and without (48% of needs) warrants the inclusion of additional layer of industrial allocation beyond the proposed SIL allocation at draft Policies E2, E3 and E5.

- 2.5 Draft Policy E2 recognises that SIL land is critical to the effective function of London's economy. These will be safeguarded in accordance with London Plan policies and intensification will be encouraged.
- 2.6 Draft Policy E3 safeguards the borough's SIL to meet strategic economic needs and accommodate increases in employment floorspace. Proposals which result in a net loss of light and general industrial, storage and distribution, research and development and related sui generis floorspace in SILs will be refused, as will developments that include residential uses. Proposals within or adjacent to SILs should not compromise the integrity or effectiveness of these locations in accommodating industrial type activities and their ability to operate on a 24-hour basis. Policy E3 already comprises a significant level of protection for SIL land, and therefore additional restriction on adjacent land is unnecessary when coupled with the London Plan 'agent of change' policy.
- 2.7 Draft Policy E5 confirms that the Council will encourage the intensification of industrial uses within SILs and LSIS through the more efficient use of space, higher plot ratios, the development of multistorey schemes, and the assembling of sites within designated employment areas to assist with the delivery of more intensive formats will be supported.
- 2.8 Appendix C of the Regulation 18 includes a proforma for Site Allocation SA49. Draft Policy E1 states that the proformas carry the status of policy and indicate key requirements and considerations that need to be taken into account as sites come forward for development.
- 2.9 The pro-forma states that redevelopment of the site should provide a minimum of 32,500 sqm employment (light industrial, general industrial, storage and distribution, and related sui generis) floorspace. The figure used by the Council has been taken from the Call-for-Sites submission, which stated that there was c.22,000m<sup>2</sup> of floorspace on site at present and there "could" be scope for 10,000m<sup>2</sup> additional industrial floorspace.
- 2.10 The proposed wording of "should provide a minimum of 32,500m<sup>2</sup> employment" is too prescriptive, on account that the potential intensification capacity has yet to be rigorously tested. Whilst there is a clear ambition to intensify the industrial floorspace on site, in accordance with the London Plan, and Regulation 18 Policy E2, E3 and E5, it would be premature at this stage to set a minimum figure that would need to be achieved as part of any future redevelopment.
- 2.11 We would suggest that a more robust approach for the Council would be to undertake an assessment of the net-increase capacity across the SIL as a whole, rather than just one site (SA49), to determine the quantitative increase in capacity (m<sup>2</sup>) of implementing SIL intensification policies.
- 2.12 Further to draft allocation (SA49), we note that the site PTAL is reported as zero. This is inaccurate and should be updated to reflect the site's actual PTAL rating, to which the western extent of the site benefits from a PTAL 1A/B.

## 3 Other

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### The Regulation 18 Plan

- 3.1 We appreciate that the Regulation 18 Plan, called the “draft Local Plan” and “Main issues and preferred approaches” contains several policy options for assessment, increasing its length. However, at 413 pages, and with c.90 policies, in addition to 654 pages of Appendix A, D and H the current document appears excessively long with duplication across policies.
- 3.2 The Government advises that local plans should be “focused, concise, and accessible”<sup>1</sup> and this objective has yet to be implemented for the Regulation 18 plan. We would suggest a more concise and focused Regulation 19 plan is prepared.

### The Role of Crossrail 2

- 3.3 Crossrail 2 was anticipated to be confirmed in 2022, however following recent TFL funding issues it is likely to be delayed beyond the original timetable. It is likely however that the project will continue to be a national infrastructure priority as the country emerges into a post-pandemic economy.
- 3.4 The original business case made to the government identified that Enfield would need to provide a further 40,000+ new homes out of a total of 200,000 homes through land released by Crossrail 2. Enfield’s early modelling indicates that 40,000 homes required to support Crossrail 2 in Enfield cannot be met without the strategic reconfiguration of land within the eastern corridor. Much of this land is currently designated as SIL, and in a Crossrail 2 scenario would need to work more efficiently and flexibly in terms of the land uses it can bring forward to drive housing and economic growth.
- 3.5 The Regulation 18 plan refers briefly to Crossrail 2, principally in relation to safeguarding of the planned route (draft Policy T1) rather than growth aspirations arising from it. There is one reference to the benefit from Crossrail 2, which will unlock development potential in the eastern part of the borough. The increased public transport accessibility does not now appear to be a policy driver for growth. This may have informed the Council’s approach to the protection and intensification of SIL at Brimsdown Industrial Estate. For clarity, and transparency, the Regulation 18 Plan should provide some further commentary (including a proposed early review) should Government proposals for Crossrail 2 be brought forward. Enfield will need to consider how best to intensify and deliver additional floorspace capacity in either existing and/or new locations. This may necessitate the need to intensify and explore opportunities for a mix of uses and the co-location of SIL to help create sustainable communities. For this reason, we recommend that the blanket restriction on residential uses within SIL locations in accordance with Policy E3 should be removed, and some flexibility be introduced that would allow industrial intensification alongside the co-location of other uses including residential.

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<sup>1</sup> NPPG Paragraph: 002 Reference ID: 61-002-20190315

## Tall Buildings

- 3.6 Regulation 18 Policy DE6: 'Tall Buildings' and Figure 7.3 and Figure 7.4 provides the Council's policy approach to tall buildings in the borough. For the Site, the Policy applies the GLA definition of tall buildings (21m) and indicates that the area around Brimsdown railway station is appropriate for tall buildings. This approach would not tally with the employment policies that seek to optimise the SIL allocation through multi-storey schemes and which may require tall buildings to achieve this policy objective. This should be rectified.
- 3.7 More generally, we note that the tall building locations shown at Figure 7.4 are unclear, and we recommend that insets to the Proposals Map are prepared that clearly define appropriate locations for tall buildings, and in accordance with adopted Policy D1 of the London Plan set out appropriate building heights in these locations.
- 3.8 We note that Figure 7.4 identifies areas within 400m and 800m radius of transport nodes, however, Policy DE6 does not apply a policy to these site characteristics. This should be clarified in the next draft plan.

## Masterplans

- 3.9 Regulation 18 Policy SS2: 'Making Good Places' states that the Council will ensure that development is planned and implemented in a coordinated way in the identified placemaking areas, guided by Supplementary Planning Documents (SPD), Area Investment Plans, Masterplans and/or planning briefs where appropriate.
- 3.10 We have already commented that the current Regulation 18 plan is not yet focused and concise and therefore it would be onerous to burden development with further Supplementary Planning Documents (SPD), Area Investment Plans, Masterplans and/or planning briefs.
- 3.11 We do not believe that good design requires stakeholder masterplans (para 2.4.17-2.4.19), where clear policies exist at a local level and in the London Plan. This requirement should be removed to speed up the planning process.
- 3.12 Regulation 18 Policy D2: 'Masterplans to achieve comprehensive development' requires proposals to be accompanied by a masterplan, where they form all or part of a site allocation. The site masterplan must be submitted at the outline or full planning application stage. This is an unnecessary and onerous policy requirement and, in many cases, will duplicate the planning application process. Policy D2 should therefore be deleted.
- 3.13 In association, draft Policy SS2: 'Making good places', requires large scale developments "of 50 homes or more or 500sqm for non-residential uses" to demonstrate how they contribute to the vision for the placemaking area. The NPPF defines major development as that comprising 10 or more homes or a non-residential development of 1,000sqm. The current policy therefore places an overly heavy burden on minor non-residential developments and the threshold should be revised and increased to 1,000sqm.



## Development Management Policies

- 3.14 Regulation 18 Policy DE8: 'Design of business premises' is presently overly prescriptive and does not offer sufficient flexibility in reflecting the variance of development typologies that existing across all business users. To remedy this issue, we recommend that the policy is split into two parts, one which shall apply to more placemaking compatible business uses (i.e. offices, retail), and the other to more intensive uses (i.e. industrial).

**End**