

Strategic Planning and Design
 Enfield Council
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BY EMAIL

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Dear Strategic Planning and Design

BRITISH LAND RESPONSE TO THE DRAFT LOCAL PLAN CONSULTATION

CBRE Limited is instructed by British Land to make representations to Enfield's Draft Local Plan - Main Issues and Preferred Approaches (Regulation 18).

BRITISH LAND

British Land is a leading UK property company, and its assets are located within a range of locations and span a number of real estate sectors, including offices, retail, logistics and residential. British Land's core objective across all its assets is to create Places People Prefer, delivering the best, most sustainable places for its customers and communities.

In 2021 British Land acquired Heritage House, 345 Southbury Road. Heritage House is an established c.200,000 sq.ft industrial warehouse located a short distance from the A10. Following the acquisition of Heritage House, British Land wishes to become an active stakeholder in the area and looks forward to working with Enfield Council to strengthen the borough throughout the plan period and beyond.

In summary, we support the identification of Southbury as a key growth area and the ambition for it to develop a strong sense of place. Whilst we support the fundamental principles of the Southbury Vision, we are also extremely mindful that the intensification of the Great Cambridge Road Strategic Industrial Location (SIL) is a core part of this vision. It is therefore essential that the role of the SIL remains at the forefront of the policy framework for Southbury, so that local transformation supports and does not stifle the current/future success and intensification of the SIL.

RESPONSE TO THE CONSULTATION

On behalf of British Land, we have reviewed the content of the Draft Local Plan (Reg 18). Our key comments and suggested policy amendments are summarised below.

3.2 SOUTHBURY

Southbury Placemaking Vision

The vision for Southbury states: “Southbury will ... have transformed into a coherent, exemplary, high-density, mixed-use quarter containing pocket parks and high-quality public realm with new street trees and planting that offer a highly attractive environment to live and work in. Intelligent landscape design will improve air quality and reduce noise pollution from the A10. Intensification and co-location within the Great Cambridge Road Strategic Industrial Location will provide good local employment opportunities and renewed employment floorspace, together with the proposed SIL extension areas”.

We strongly support the vision to renew and intensify the Great Cambridge Road (GCR) SIL, as this location plays a regionally significant role in supporting the provision of goods and services to the people and businesses of Enfield and the wider region. Whilst we do not object to the phased redevelopment of retail parks for high-density mixed-use development, we believe that it is extremely important that the vision for Southbury, and associated Policy SP2, does not compromise the CGR SIL’s ability to operate on an intensified and 24/7 basis (as per SP E3). This is especially important as we understand that the plan relies on intensification of the area to meet some of the Council’s identified needs for industrial floorspace.

Figure 3.3 provides a visual illustration of the Southbury Placemaking Vision, and suggests that new walking routes are considered through SIL sites such as Heritage House in the GCR SIL. Policies / area strategies that seek to promote pedestrian routes through SIL land should be carefully considered and discussed with landowners. Whilst increased permeability across the borough should be promoted where appropriate, the vision within Figure 3.3 (and alike) needs to acknowledge that in some cases new connections may conflict with the overriding strategy to protect, intensify, and modernise SIL, which should be considered as the strategic priority. There are three key reasons for this:

1. Breaking up industrial sites into smaller plots can impose design constraints on new industrial development and reduce the efficiency of land for industrial development/activities which would support modernisation or intensification.
2. Reducing plot size will reduce the availability of larger format sites and buildings which are characteristic of the GCR SIL and are key to its attraction as one of London’s most important business areas.
3. Large building plots are required to deliver multi-level industrial development, as promoted by the Draft Local Plan and the London Plan. Requiring new routes through industrial sites would limit the scope for such innovation.

With these considerations in mind, we recommend that the Council engages with SIL landowners to understand what the practical/operational constraints are to opening up sites to pedestrians. The outcome of these discussions should be used to inform future placemaking strategies for the area (specifically the Southbury SPD/masterplan referenced in Policy SP2 below). In the case of Heritage House, we feel that additional permeability through the site may be inappropriate due to its industrial land use and the nature of its boundaries (i.e. railway line to the east).

Policy SP2: Southbury

Part 1 proposes the development of a spatial framework or masterplan for Southbury, to be adopted as an SPD and/or public realm design guide/code. We support the preparation of a spatial framework for the area and request that the Council involve British Land in this process given the scale and location of its land interests, as well as its experience of long-term investment in placemaking and mixed-use development.

Part 3 sets out a number of placemaking objectives for change in the area to achieve. This includes creating a coherently planned and appropriate distribution of scale and massing of built form (b) and creating urban blocks that provide a street network (now and in the future) that will integrate well with surrounding residential areas (c). Our comments on Figure 3.3 above and recommendations to explore this objective in the context of industrial intensification applies here.

We recommend that a further objective is added to part 3 which requires development to protect the existing operation and future intensification capacity of designated SIL, especially where new residential development is introduced in close proximity. We believe this is critical to achieving successful placemaking in the area, as the role of business here is, and will remain, an integral part of its character and regional function. It is essential that wider masterplanning with a residential focus does not undermine the true operational function of SIL sites

With regards to part 4 – which references new cycle lanes and a green buffer, we encourage the Council to engage further with local landowners to better understand how this would be delivered, and at what, if any, cost to the sites along this corridor.

Part 6 states that development will need to contribute to improvements to the public realm and townscape particularly along Great Cambridge Road and Southbury Road. We recognise and support that new development offers an opportunity to improve the local area, and – in line with planning law and policy – expect that any contributions sought for public realm improvements will need to be proportionate to the scale of demand generated for walking and cycling and should not compromise development viability. Off-site improvements that are not specifically required to make a defined development acceptable in planning terms should be funded by CIL – this applies to the public realm works mentioned in part 6 of this policy, and any other non-specific improvements referenced in the plan.

Part 7 requires the delivery of/contribution towards new pocket parks and improved accessibility and enhancements to nearby open spaces. As above, we expect this to be proportionate to the scale of demand generated for such facilities, which is likely to be predominantly driven by the new residential population.

Paragraph 3.2.9 of the supporting text states that there will be a considerable increase in the number of tall buildings, which would be considered as anything above 15-storeys. This is supported in principle, however we would be grateful for clarification on the definition of a ‘tall building’ in Southbury, as draft Policy DE6 suggests 21m and not 15 storeys. A consistent approach across the plan may be more appropriate.

4. SUSTAINABLE ENFIELD

As a general point, the evidence base documents published as part of the consultation on sustainability matters are very limited. We would welcome a review of more detailed evidence to enable a more thorough response during the next phase of consultation (Regulation 19).

Policy DM SE3: Whole-life carbon and circular economy

The whole life cycle carbon targets set out in Table 4.1 appear to reflect the RIBA 2030 targets for domestic and non-domestic developments which were published in 2019. We understand that the RIBA targets were updated in Version 2 of the RIBA 2030 Climate Challenge to reflect developments in carbon benchmarking and to align with London Energy Transformation Initiative (LETI) targets. Whilst our client has its own sustainability objectives that they explore through any future development proposal(s), we recommend that Table 4.1 is updated to reflect the targets adopted by the RIBA and LETI, which represent the industry standard for whole life cycle carbon benchmarking. For non-domestic development these comprise:

- 2023/adoption of plan: 1,400kgCO₂e/m²
- 2025: 970kgCO₂e/m²

- 2030: 750kgCO₂e/m²

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

We will provide comments on Table 4.5 (Carbon offset tiers) once rates have been set for regulated emissions, which we expect to be published ahead of the Regulation 19 consultation. Our objective at this time will be ensuring that this achieves an appropriate balance of planning objectives (e.g. achieving economic growth and mitigating climate change). We would welcome your notification once the rates have been published by the Council.

Policy SP SE7: Climate change adaptation and managing heat risk

Paragraph 4.7.4 of the supporting text states that *“where necessary, a contribution to cooling measures for spaces and streets outside the development boundary may be appropriate, for example, to make the public realm more comfortable and attractive for walking and cycling in line with the healthy streets approach set out in the London Plan”*. We recommend that it is noted that such a contribution will address all CIL Regulation 122 tests for planning contributions.

Policy DM SE10: Sustainable drainage systems

Part 3 states that all major developments must achieve greenfield run off rates. We recommend that this is updated to requires *‘as close as possible to greenfield rates’* to conform with the London Plan (2021).

Part 6 of this policy states that all developments must utilise source control SuDS measures such as rain gardens, green roofs, permeable surfacing across the whole site to capture the first 5mm of rainfall. Such a requirement is not practical on many parts of industrial sites. For example, industrial warehouse roofs cannot typically take the load of green roofs without significant structural enhancements which make industrial development unviable, and which add significantly to the embodied carbon of a building. Also, whilst permeable paving can be used on parking areas, it is not appropriate for highly trafficked yards and access roads. We would encourage the Council to acknowledge these constraints in Draft Policy DM SE10.

5. ADDRESSING EQUALITY AND IMPROVING HEALTH AND WELLBEING

SP SC1: Improving health and wellbeing of Enfield’s diverse communities & SP SC2: Protecting and enhancing social and community infrastructure

This policy requires development to contribute to a range of improvements, including access to local community facilities, services and shops. Whilst we support these objectives across the borough as a whole, not all forms of development can directly deliver this, due to their scale, location or nature of use. We recommend that the intended application and interpretation of this policy in decision making is clarified.

6. BLUE AND GREEN ENFIELD

DM BG8: Urban greening and biophilic principles

Part 2 of this policy states that new development will be expected to promote opportunities to restore, create and enhance Enfield’s tree and woodland resource and improve links to existing assets. It lists priority areas for delivering this but does not explain how this will be achieved. If this is set out in part 3 of the policy, we recommend that a cross reference is included in part 2 for clarity. This detail is required in order to comment on this policy.

Whilst the objective of delivering green walls and roofs in development is supported, we welcome the inclusion of the policy wording '*subject to viability and other planning considerations*' in part 3(b), as these features are not always feasible or environmentally desirable when considered in the round (as explained above in response to Policy DM SE10).

In part 3(c) of this policy, we recommend that the word 'maximise' is replaced with 'optimised' with regards to soft landscape treatment etc., as land and buildings will need to achieve a variety of objectives which includes but is not limited to urban greening.

DM BG9: Allotments and community food production

The requirement for promoting food production in new development is not defined to any specific scale or category of development. If the intent is to apply this requirement to all development, including industrial uses, we would welcome guidance on how this has been successfully achieved in precedent developments – particularly within SIL locations. We are particularly interested in how this is managed and to what extent it is used by staff at a place of work.

Part 4 states that new food growing spaces should be accessible to everyone. This requirement will not be appropriate if industrial development is expected to promote food production, as there is a requirement for industrial premises (especially industrial units/sites) to be secure and not accessible to the general public for operational, commercial and health and safety reasons.

7. DESIGN AND CHARACTER

DM DE2: Design process and Design Review Panel

Part 2(a) of this policy states that all applications should seek pre-application advice. We believe this should be refined to specific circumstances, as it's unlikely to be practical or necessary for every application to be subject to the pre-application process.

Part 2(ai) promotes the use of planning performance agreements (PPAs). We support the use of PPAs as in our experience this ensures that projects are appropriately resourced and progress in an effective and timely manner.

Part 2(aii) states that large/GLA referable schemes will need to attend multiple design review panels at early, intermediate and pre-submission stages. We recommend that flexibility is incorporated into this policy which acknowledges the requirements of varying types and forms of development, such as some industrial development - as by their location and very nature there will be circumstances where extensive design review is not necessary.

DM DE6: Tall buildings

In response to the definition of tall buildings as set out in part 1(a), please see above our comments on the Southbury Placemaking Vision which suggests that a local definition of 15 storeys will be applied – for the avoidance of doubt we support this definition being applied to Southbury. We also support our client's asset at Heritage House being identified in Figure 7.4 as being potentially appropriate for buildings of up to 48m.

Part 2 sets out a number of design requirements for tall buildings and (d) states these should provide high quality private and communal amenity and play space. This suggests that all tall buildings will be residential. We recommend that this policy is removed or appropriately amended to ensure that non-residential tall buildings can come forward in the borough. Further, high quality private and communal amenity and play space should be a requirement of any residential development and is repeated in other policies in the plan.

Part 2(f) requires tall buildings be carefully sited to avoid creating a wall of tall buildings or isolated and poorly defined buildings and spaces. The application and interpretation of this policy in the context of large format industrial development (perhaps consisting of 2 or more floors) is unclear. To avoid such innovative forms of development being stifled on industrial sites, we strongly recommend that the policy is drafted pragmatically to allow for certain forms of development which, by their very nature, will often present large elevations, but which could be treated in interesting/innovative ways to offer visual interest and/or break down the mass of the tall building. We anticipate that this policy will present a significant soundness issue if not resolved before submission of the plan for examination, given how important industrial intensification is to achieving conformity with the London Plan and to achieving Enfield's overall growth strategy (which relies on the capacity existing industrial sites being increased).

DM DE8: Design of business premises

We recommend that this policy, and the plan more generally, acknowledges the difference in design and materiality between residential and industrial buildings. The primary role of business premises is to create spaces which allow Enfield's businesses to thrive and succeed, this – in addition to design, placemaking and sustainability – must shape planning policy.

Part 1(a) states that business premises must facilitate movement through the provision of suitably located, safe, naturally lit and publicly accessible routes. As we have noted above, it is not always possible or desirable to allow movement through business premises. However, development can help to improve the quality of movement outside the demise of individual business premises through carefully considered design of buildings and the spaces around them. We recommend that policy is amended to clarify that 'facilitating movement' means improving the site's contribution to creating safe streets, through conserved urban design and architecture.

Part 1(b) states that premises must positively address the public realm and more active areas should front the public realm and be located close to the site entrance. We feel that an element of flexibility is required in this policy such as *'unless it would adversely impact the capacity or operation of the site'*, as there may be occasions where – for access reasons for example – it is not possible for buildings to provide an active frontage to the street.

Part 1(h) requires that the massing and facades of buildings are made visually interesting through architectural detailing, height variation and fenestration. Industrial warehousing typologies do not typically lend themselves to variation in height due to their structural design and large footprint. We therefore recommend that height variation is removed from this policy – or at least applied more pragmatically to industrial development.

Part 1(i) states that premises must respect the grain and character of the surrounding area, for example by wrapping larger buildings in smaller units to maintain activity, character and visual interest. We recommend that this policy is removed or refined so not to compromise opportunities for intensification, especially in SIL areas, which is intended to create a step change in the grain and character of the area to increase industrial capacity and achieve a more efficient use of land. Such development is central to the London Plan's industrial land management strategy and is also noted as being critical in meeting Enfield's industrial needs. The policy framework should encourage the development of new business premises typologies and not require the status quo to be maintained.

Part 3 refers to 'larger developments' in the context of the provision of neighbourhood scale facilities and amenities. 'Larger developments' should be defined in policy, as clearly one or two buildings are not likely to generate the critical mass needed to support such facilities.

9. ECONOMY

Policy SP E1: Employment and growth

We support the reference to 251,500 sqm being the minimum quantum net additional industrial and logistics floorspace required in the borough.

We also support the Council committing to work with landowners to intensify development of industrial, logistics and related functions in existing employment areas such as the GCR.

Policy SP E2: Promoting jobs and inclusive business growth

We support the strategy to safeguard and intensify land identified as SIL, which includes Heritage House in Southbury.

Part 3(c) of this policy promotes the intensification of employment generating activities in SILs and LSIS. We recommend that the policy acknowledges that there may be exceptional circumstances where important, larger scale utilities infrastructure is required in SIL/LSIS which does not necessarily help to intensify employment on the specific site but does meet planning objectives/needs at a borough-wide and/or strategic level.

Part 4 states that proposals will be supported which provide opportunities to promote the creation of a growing and diverse economy through ensuring availability of a range of workspaces and unit sizes, start-up space, co-working space and 'grow-on' space. We recommend that policy acknowledges that such typologies should be directed to town centres, non-designated sites, mixed use schemes and possibly LSIS, as these smaller units are typically more appropriately accommodated in these types of location. We recommend that policy also acknowledges that such space should not be prioritised in SILs, which are in short supply and, by definition, have the capacity to accommodate strategically important and regionally significant business premises that could not be readily accommodated elsewhere.

Policy SP E3: Protecting employment locations and managing change

Part 1(d) sets out that 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. This is strongly supported, as it's important to recognise that industrial capacity is not solely measured by floorspace, but also by the intensity of activity on a site, which includes hours of operation.

Policy SP E5: Transforming Strategic Industrial Locations and Locally Significant Industrial Sites

We strongly support part 1 of this policy which states 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. We recommend that policy also explicitly supports innovative forms of development that seek to optimise the efficient use of industrial land, which is in limited supply.

Part 2(d) supports proposals which are informed by engagement with existing businesses to seek to retain them on site where possible, implement effective transitional arrangements and provide support for any businesses that cannot be incorporated to relocate off site. We support this being promoted by policy as a positive way to bring forward development 'where feasible', rather than an absolute requirement.

Figure 9.1 – Areas for SIL intensification

We recommend that Heritage House is identified as an Industrial Intensification Site on Figure 9.1, as the large site it occupies has the potential to accommodate a multi-storey industrial building. This needs to be verified by feasibility testing.

Policy DM7: Providing for workspaces

This policy relates to proposals for new 'workspace'. The meaning of this term in the context of this policy is unclear and a definition is required to support its application in decision making. As noted in our response to SP E2 and E3, we feel strongly that small scale business space that could be appropriately integrated into residential neighbourhoods/mixed use development should not be promoted or required by policy on SIL land. SIL land is in extremely short supply and should prioritise requirements for large scale/high impact industrial activities that cannot be appropriately accommodated on other mixed use or employment sites in the borough. Requirements for small workshops and quasi-office spaces in SIL may erode its capacity for strategically important industrial development and this must be avoided to meet identified needs for industrial development.

Policy DM E8: Local jobs, skills and local procurement

Part 1 of this policy suggests that an employment and skills plan should be submitted at planning application stage. Whilst we support the principle of establishing an approach at this point in the process, we suggest that this comprises a 'strategy' or 'outline' version of the document. We recommend that a detailed plan and/or methodology is reserved for approval following the grant of planning permission, but prior to a main contractor starting on site. We believe that staggering the detail of the plan in this way is necessary, as it is difficult to accurately identify the number of trainees who will be employed/how many weeks training will be offered prior to a contractor being involved.

The supporting text also states that at least one apprentice or trainee should be employed per £1 million of contract value. Where this is not feasible, financial contributions will be required in lieu of provision to support other training and employment initiatives. Whilst our client is extremely supportive of the objective to support local training and skills opportunities, we consider this target to be challenging based on our experience of delivering large scale development and would welcome evidence to support this particular target.

13. MOVEMENT AND CONNECTIVITY

T1 - Promoting sustainable transport

Part 1(c) of this policy expects development to be car-free (or offer a low level of parking provision) and support complementary measures, such as car clubs and contribute towards well-designed walking and cycling routes. We encourage the use of a range of sustainable transport solutions in new development, however the plan should acknowledge that some parking will be required in many circumstances, including in industrial development. It is common for industrial business premises to operate on a 24/7 basis, and it is also common for these businesses to divide their operations into shifts. Often these shifts will start/end outside of public transport operating hours, and as a result some staff parking is usually required. Allowances in policy should be made for such circumstances. Operational vehicle uses and parking is also an essential element of most industrial development and will need to be allowed/supported by planning policy.

Part 1(d) states that development should reduce traffic. This is not always possible or desirable (from an economic growth perspective), particularly for industrial development. The primary business function of a logistics premises is to optimise the efficiency and the quantum of goods that can be moved into and out of the site. Policy at the local and regional level requires such development to be intensified to meet the needs of

the borough/London, and where a logistics site is intensified it will inevitably result in more traffic movements. We therefore recommend that Policy T1 is refined to allow for appropriately managed and mitigated industrial intensification to come forward as this would currently be prevented by the wording of the draft policy.

Part 2(a) requires major development contributes to the delivery of four-tracking of the West Anglia mainline (between Tottenham Hale and Broxbourne). This policy should be adapted to state '*where reasonable and appropriate*', to ensure that only major development that would generate demand for/benefit from such improvements contributes to their delivery.

15. DELIVERING AND MONITORING

Policy DM D2: Masterplans to achieve comprehensive development

Part 2 states that where an outline application is submitted, it should be accompanied by a full planning application for the first phase of the development. We do not consider this requirement to be appropriate and each case should be treated on its own merits, with pre-application advice being used as a tool to define the appropriate application format, in accordance with draft Policy DM DE2.

APPENDIX D – FINANCIAL CONTRIBUTIONS

We interpret this appendix to relate only to residential development, as this is what is currently indicated in the relevant tables (see specifically the first column). We would be grateful if this is clarified.

We trust that these representations are clear and very much look forward to working with you to help shape future policy.

Yours faithfully,