



Strategic Planning and Design
 Enfield Council
 FREEPOST
 NW5036
 EN1 3BR

13 September 2021

Dear Sir/Madam,

241 GREEN STREET, BRIMSDOWN ENFIELD EN3 7SJ – LOCAL PLAN

We write in response to the current consultation on the draft Enfield Local Plan. Our client, Stonegate Homes, are the owner of 241 Green Street, Brimsdown. This site is the subject of a current planning application (LPA ref: 20/01526/FUL) that received a resolution to grant for 148 new units and 1,144.5 sqm of flexible commercial floor space in December last year. The S106 agreement is currently being finalised for this site.

We wish to note that we are broadly supportive of the draft Local Plan and welcome Council's aspirations for providing housing with a focus on maximising the capacity of existing brownfields sites across the borough.

Policy SP H1 notes that the draft Local Plan has a target of 1,246 new homes per year and Table 8.1 of the policy lists the allocated sites across the borough that will help to deliver that target. Site SA34 is for 241 Green Street, and is listed as suitable for mixed use proposals and 148 residential units. This is in line with the current planning application and we support the principle of this allocation.

However there appears to be a discrepancy with the policy wording, and SA34 proforma later in the draft Local Plan document. SA34 proforma allocation on page 353 instead states that the site capacity is 94 new homes and 'replacement employment floorspace with no net loss'.

In the first instance, we request that the proforma housing capacity be amended from 94 to 148 units to be consistent with Policy SP H1 and current planning application.

Second, the site is currently occupied by two large warehouses of 3,318 sqm total. We understand and support the need to re-provide some commercial space, however the inclusion of no net loss should be removed.

The site is surrounded by residential development which limits the types of industrial uses (Class B2) that would be suitable in this context. The site is also remote to the main industrial area to the east and separated from key transport links by a railway line with a level crossing and there are transport and highway constraints which reduce its attractiveness for employment occupiers. The scheme has satisfactorily demonstrated that the proposed mix of uses is acceptable. The draft inclusion of "no net loss" is unnecessarily prescriptive and should be removed.

In addition to the site constraints, the need to provide car parking, cycle parking, waste storage, plant room, amenity and open space (inc. child play space), and a clear and legible building entry for

residents, are all limitations on the available area at ground floor that can be used for commercial / employment purposes.

The current application strikes as appropriate balance between residential and commercial uses. The design also provides for a flexible range of uses to ensure the future viability of the space. This might include smaller creative workshops or spaces that compliment the nearby industrial uses but are compatible with the residential nature of the site. The provision of a modern, flexible commercial space is a more efficient use of the space and will likely provide a higher density of employment than the current Class B8 warehouse use, albeit a smaller area.

Separate to the above, we note that the building heights shown in Policy DM DE6, Figure 7.4 are unclear and note the map needs to be amended.

In summary, we ask that the allocation pro-forma be amended to 148 unit capacity, and the wording is changed to request the re-provision of "some flexible commercial floor space where appropriate" and we reserve the right to continue to comment as the draft local plan progresses.

Should you have require any further information please don't hesitate to contact either Gill Eaton (07741 658 050, geaton@iceniprojects.com) or Sandy Scott (07881 200 941, sscott@iceniprojects.com).

Yours faithfully,