



Strategic Planning and Design
 Enfield Council
 FREEPOST
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Date: 13th September 2021
 Our reference: I1080844

Dear Sir / Madam,

Representations to the London Borough of Enfield Local Plan 2036 | Regulation 18 'Issues and Options' Draft

On behalf of Henry Boot Developments (hereinafter 'HBD'), Knight Frank hereby submit representations in respect of the London Borough of Enfield Local Plan (Regulation 18 'Issues and Options' Draft) (hereafter 'Draft Local Plan').

HBD has entered into a Joint Venture partnership with the London Borough of Enfield (hereinafter 'LB Enfield') to deliver the comprehensive redevelopment of Montagu Industrial Estate, Montagu Road, London, N18 3PR (hereinafter 'the Site'). These representations are submitted on behalf of the Joint Venture. The proposed redevelopment will regenerate the Site, deliver enhanced and intensified industrial and employment-generating uses, and provide an uplift in employment floorspace.

Background

The Montagu Industrial Estate comprises a large industrial estate located to the south of the Borough, in close proximity to Meridian Water and the North Circular (A406). Within the adopted Development Plan, Edmonton Leaside Area Action Plan and the Draft Local Plan, the Site is allocated as both part-Strategic Industrial Location (hereinafter 'SIL') and part-Locally Significant Industrial Estate (hereinafter 'LSIS'). The Site is also located within the Upper Lea Valley Opportunity Area.

Together with LB Enfield, our client is in the process of preparing a Hybrid Planning Application for the comprehensive redevelopment of Montagu Industrial Estate, to deliver enhanced industrial and employment-generating uses (falling within Use Classes E(g), B2 and B8 of The Town and Country (Use Classes) Order 1987 (as amended), alongside ancillary facilities (i.e. a café, falling under Use Class E).

HBD has been involved in detailed pre-application discussions with LB Enfield and the GLA since 2019. These discussions have informed the Full Planning Application approved for Phase 1 (discussed below), the Hybrid Planning Application to be submitted late this year, and the contents of these representations.

Full Planning Permission (Ref. 19/03036/FUL) was approved in October 2020 for Phase 1 of the comprehensive redevelopment of wider Montagu Industrial Estate. Phase 1 incorporates the north-western corner of the Montagu Industrial Estate, and comprises the delivery of 5,170 sq. m. (GIA) of B1(c), B2 and B8 floorspace.

It should be noted that HBD submitted representations in relation to the Local Plan Issues and Options consultation that took place in December 2018 – February 2019.

Representations

The purpose of the Draft Local Plan is to guide and accommodate future housing, economic and infrastructure growth in the

Framework (2021), as well as regional guidance and policies produced by The Mayor of London (i.e. the London Plan (2021) and its Supplementary Planning Guidance, including Industrial Intensification and Co-Location Study (2018)).

We note that in preparing the Draft Local Plan, LB Enfield has published a series of evidence base documents, including:

- Industry in Enfield (2017);
- Employment Land Review (2018);
- Draft Enfield Industrial Intensification Study (2020);
- Enfield Industrial Intensification: Market Deliverability Study (2021); and
- Enfield Employment Topic Paper (2021).

Having reviewed the Draft Local Plan, and supporting evidence base, HBD seek to submit representations in relation to the following topics:

- Vision and Objectives of the Local Plan;
- Site Allocation ref. SA51;
- Safeguarding of SIL and LSIS;
- Intensification of Industrial Floorspace;
- Office Uses;
- Social Infrastructure Uses; and
- Sustainability.

In summary, whilst HBD are generally supportive of the emerging policies contained within the Draft Local Plan (particularly relating to the safeguarding of SIL and LSIS (**Policy SP E1, SP E2 and SP E3**), a number of clarifications and amendments are sought in order to ensure that policies are justified and sound; and to reflect national and London planning policy.

HBD's main concern relates to the treatment of the Montagu Industrial Estate allocation (ref. **SA51**). At present, the Site Allocation red line plan does not encompass the entirety of the Site. This should be rectified in order to ensure that the Industrial Estate can be comprehensively redeveloped, as encouraged by the ELAAP. Further clarification is also sought regarding how Site capacity has been calculated.

Whilst HBD are supportive of LB Enfield's ambitions to intensify existing industrial sites (as highlighted by **Strategic Objective 12, and Policies SP SS1, SP E1 and SP E2**), such intensification needs to be managed carefully, in order to ensure that sites like Montagu Industrial Estate remain functional, and of a high-quality. Policy needs to reflect the multi-faceted definition and approach to intensification, as highlighted by the GLA's Industrial Intensification and Co-Location Study (2018).

Minor amendments are sought to **Policy E4** to ensure that small-scale office accommodation is supported as an ancillary function of out-of-centre Industrial Estates. Amendments are also required to **Strategic Policy SP SC2** to ensure that community uses are not unnecessarily protected in unsuitable locations.

These representations also make recommendations in relation to the suite of environmental and sustainability policies included in the Draft Local Plan, to ensure targets are achievable and viable, and do not unduly impede development. These main concerns and comments are discussed in further detail below.

Vision and Objectives

Our client is supportive of the vision and aspirations of the Draft Enfield Local Plan. HBD particularly welcome the Council's commitment to supporting employment opportunities and creating "*attractive places for business growth*".

Objective 13 sets out the Council's commitment for delivering an "*uplift in employment floorspace to meet the needs of businesses. To capitalise on rising demand for logistics and manufacturing by focusing growth in Strategic Industrial Locations and Locally Significant Industrial Sites and the provision of new sites in appropriate locations*".

Objective 14 seeks "*to celebrate and make the most of our industrial heartlands, protecting floorspace capacity in employment areas and encouraging industrial intensification. To ensure new development maximises the blue-green connectivity of employment areas, contributing to positive placemaking to attract businesses and investment*".

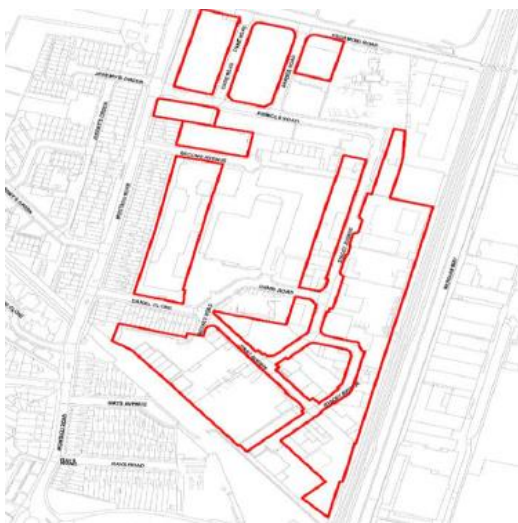
This approach and the Council's overall aspiration to improve its industrial and employment-generating floorspace is welcomed by HBD, given that the proposed redevelopment of Montagu Industrial Estate seeks to meet these objectives. Whilst there is a key emphasis on protecting floorspace, and intensifying where possible, we recommend explicitly citing the Council's desire to regenerate existing Industrial Estates, as per the objectives of the ELAAP. As was the case with the previous Regulation 18 Draft Local Plan (which was consulted on in December 2018 – February 2019), we also recommend referencing the Council's ambition of delivering flexible accommodation to meet the needs of local businesses. Amending Objectives 13 and 14 in this manner will encourage qualitative and quantitative improvements to existing industrial estates.

Site Allocation

The Montagu Industrial Estate is partially allocated for employment-led development (under **Site Allocation ref. SA51**). The red line plan for the Site Allocation (shown in Figure 1) does not encompass the entire Site. It simply covers land owned by LB Enfield; despite LB Enfield being in a Joint Venture with HBD to comprehensively redevelop the entire Industrial Estate. As drafted, notable exclusions include the GBN and Hanson Sites and all internal circulation roads. In order to ensure the comprehensive redevelopment of the Montagu Industrial Estate, as encouraged by the adopted Core Strategy (2010), Development Management Document (2014), and Edmonton Leaside Area Action Plan (ELAAP) (2020), the Site Allocation should cover the entire Montagu Industrial Estate (as shown in **Appendix A**).

At present, allocating only smaller parcels of land within the Montagu Industrial Estate will undermine efforts to comprehensively regenerate the Montagu Industrial Estate, and to intensify floorspace as encouraged by **Strategic Objective 12, Strategic Policy SP SS1 and Strategic Policy SP 21** of this Draft Local Plan, and **London Plan Policy E7**.

Figure 1: Site Allocation Ref. SA51 – Red Line Boundary



Source: Knight Frank

In turning to the issue of capacity, the Site Allocation lists the “*land use requirements*” of the Site to be to “*provide a minimum of 38,600sq.m. of employment floorspace (light and general industrial, storage and distribution, and related sui generis uses) floorspace, to deliver a net increase of 6,615sq.m. of employment floorspace*” [our emphasis].

This figure differs slightly from that cited under the “*capacity estimate*” section (6,613 sq. m. industrial floorspace). Whilst this discrepancy is minor, the approach to floorspace should be consistent throughout the Draft Local Plan.

HBD also request further clarity regarding how these figures have been calculated. Whilst the principle of providing an uplift in industrial floorspace is not contested, assurances need to be provided that the required floorspace uplift could viably and feasibly be delivered on-site. At present, there appears to be no reference in the Council's own evidence base as to how these figures have been arrived at and whether it is commercially viable/deliverable. In considering whether the suggested uplift is achievable, we encourage LB Enfield to consider the complex nature of the current Site Allocation red line plan, which as discussed above, would inhibit the comprehensive redevelopment of the Montagu Industrial Estate. We also encourage LB Enfield to acknowledge other adopted and Draft Local Plan policies, which will need to be addressed as part of any proposed redevelopment of the Montagu Industrial Estate, and which could result in a net increase of 6,615sq.m. being unachievable. These include objectives to improve the public realm and increase landscaping / tree planting (**Draft Local Plan Policy SP BG1; Draft Local Plan Policy DE8 (b)**); improve movement, accessibility and legibility (**Draft Local Plan**

Policy DE8 (a)); preserve residential amenity (**Draft Local Plan Policy ENV1**); create high-quality internal environments (**Draft Local Plan Policy DE8 (I)**); introduce SuDS measures (**Draft Local Plan Policy SE10**); and safeguard waste capacity (**London Plan Policy E4** and **Draft North London Waste Plan**).

In accordance with our pre-application discussions, where LB Enfield has encouraged HBD to introduce complementary uses (i.e. a café, or nursery), we suggest for consistency that the Site Allocation be amended to reference the fact that “*ancillary facilities*” or “*complementary uses*” would be supported on the Site, where these support the function and operation of the Industrial Estate. Such uses are common on such estates and would support the function of the rejuvenated Industrial Estate; increase footfall; and potentially provide additional active frontages to Montagu Road.

Under “*Existing Use(s)*” it is stated that the Site comprises an Industrial Estate. Whilst this is correct, it should be noted that the Site currently comprises a series of uses that are not all industrial in nature. As a consequence of the organic growth of the estate since the 1940s, the high site density, the age and quality of the current built fabric, there are several operational issues onsite. The vast majority of units are now, by modern standards of construction and use, physically and functionally obsolete.

Under “*Heritage Considerations*” it is noted that there are “*None*”. However, the Site sits adjacent to Montagu Road Cemeteries Conservation Area. This should be highlighted for completeness.

In consideration of the above, we request that the red line boundary for Site Allocation ref. SA51 is reconfigured, to encompass the entirety of Montagu Industrial Estate. We also request greater clarity as to how estimated capacity has been calculated, and confirmation as to whether the estimated capacity figure has been calculated in consideration of the Site’s constraints and other policy objectives.

Safeguarding of SIL and LSIS

Policy SP E1 (Employment and Growth) outlines the Council’s commitment to delivering a minimum of 251,500 sq. m. net additional industrial and logistics floorspace, and 37,000sq.m. of net additional office floorspace, over the Plan period. The Council seek to do this by: (a) intensifying the development of industrial, logistics and related functions in existing employment areas; (b) providing new sites in urban areas accessible to the strategic road network, alongside new locations in appropriate parts of the Green Belt; and supporting an uplift in office floorspace in Enfield’s major and district centres, as well as Meridian Water. **Table 9.1** identifies Montagu Industrial Estate for “*employment related uses*”.

Policy SP E2 (Promoting Jobs and Inclusive Business Growth) states that proposals that support, protect and enhance the role and function of the Borough’s employment locations, and maximises the provision of employment floorspace will be supported. This reflects national and London Plan policy.

Policy SP E3 (Protecting Employment Locations and Managing Change) sets out the Council’s ambitions to safeguard Strategic Industrial Locations (SIL) and Locally Significant Industrial Sites (LSIS). **Policy SP E3 (1)** outlines that the Council will safeguard SIL to “*meet strategic economic needs and accommodate increases in employment floorspace*”. The Policy explains that “*general and light industrial, storage and distribution, research and development and related sui generis uses (such as wholesale markets, waste management, utilities infrastructure) are encouraged in SIL, alongside ancillary office use and land for sustainable transport functions. Small scale food and drink and leisure uses which meet the day-to-day needs of workers and do not adversely affect the industrial status or operation of the area will be supported*”. HBD welcome the Council’s ambition to safeguard SIL and is encouraged by the range of uses considered acceptable for SIL, as this accords with **London Plan Policy E4**.

Policy SP E3 (2) further explains that the Council will safeguard LSIS to meet local business needs. **Policy SP E3 (2)** states that “*general and light industrial, storage and distribution, research and development and related sui generis uses are encouraged in LSIS. Proposals for non-industrial type uses in LSIS must not compromise the business function of the site*”. Based on this, we understand ancillary uses such as offices, cafes, nurseries etc. would be considered acceptable in LSIS. This is to be welcomed.

In relation to the redevelopment of SIL and LSIS, **Policy SP E3 (3)** explains that “*where sites are redeveloped scope for intensified industrial floorspace should be prioritised over other forms of development*”. Notwithstanding our comments in relation to intensification below, this policy is to be welcomed, as this reflects the Council’s ambition to maximise industrial floorspace across the Borough and accords with HBD’s aspirations for the Montagu Industrial Estate.

HBD support the Council’s approach to co-location. **Policy SP E3** clearly sets out that residential uses would not be acceptable in SIL, and would only be acceptable in LSIS where they would not compromise the business function of a Site. **Policy DM DE8** (Design of Business Premises) outlines the circumstances in which co-location may be acceptable. For

consistency, we recommend that Policy DM DE8 is caveated to note that, alongside according with a number of design criteria, co-location will only be supported on non-designated industrial sites, or on LSIS (in accordance with **Policy SP E3**).

Overall, HBD welcome the Council's protection of existing SIL and LSIS sites, and support the objective of prioritising the delivery of industrial floorspace on designated sites. As drafted, **Policy SP E3** appears consistent with national and London Plan Policy.

Intensification of Industrial Floorspace

The aspiration of intensifying existing employment sites is referenced multiple times throughout the Draft Local Plan; most notably: **Strategic Objective 12; Strategic Policy SP SS1; Strategic Policy SP E1; and Strategic Policy SP E2**.

HBD support the premise of encouraging intensification on appropriate existing industrial sites, but request that the Council take a pragmatic and transparent approach to assessing site capacity and determining what level of intensification may be acceptable.

Guidance provided in the GLA's Industrial Intensification and Co-Location Study (2018) is a helpful starting point, noting that there are many ways of intensifying an employment site, other than "*spatial intensification*" (i.e. simply increasing floorspace). These include economic intensification (introducing new sectors, targeting specific businesses, increasing employment); process intensification (using new technologies and improving functional efficiency); and urban intensification (improving public space and transport). In redeveloping the Montagu Industrial Estate, due consideration will be given to all forms of intensification (as required by London Plan Policy E7). Policies in the Draft Local Plan should be updated to reflect this.

We understand that policies regarding intensification, and related Site Allocations, are based on LB Enfield's evidence base, including Enfield's Draft Industrial Intensification Study (2020) and Enfield Industrial Intensification Market Deliverability Study (2021). Both evidence base documents provide an overview as to how existing industrial estates could be intensified. The former, prepared by AECOM, provides capacity assessments of existing Industrial Estates across Enfield, but does not include a detailed "Site Assessment Summary" for Montagu Industrial Estate.

The Study states that whilst there are some sites within Montagu Industrial Estate that could be intensified, the "*wider redevelopment of the entire estate has ... not been assessed as having potential to be realised and no potential additional floorspace capacity has been assessed as being delivered at this location*". With this statement in mind, and in consideration of the fact that the Study does not provide existing floorspace figures, or a figure regarding potential capacity, it is difficult to understand how the quantum of uplift required on Site (as stated in Site Allocation ref. 51) has been calculated. HBD seek clarification on this.

HBD are particularly concerned with regards to references to introducing "*multi floor development*" (Supporting Text Paragraph 9.3.5) as a means of intensification. As highlighted by the Council's Employment Topic Paper (2021), "*upper floor industrial space is generally more expensive to deliver but at the same time less attractive to occupiers. This is particularly the case where intensified formats are reliant on goods lifts to access upper floors*". Furthermore, the Paper confirms that "*the qualitative mix of some formats of intensified space does not meet the Boroughs identified economic need – nor the main driver of industrial demand in Enfield. Enfield has a buoyant industrial market and is one of the prime locations for logistics – which would struggle to operate from some of the AECOM formats*".

In accordance with **Paragraph 82 of the NPPF**, planning policies should be "*flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices... and to enable a rapid response to changes in economic circumstances*". In this respect, LB Enfield should refrain from setting out prescriptive means of intensification, and allow Industrial Estates to develop organically, in accordance with market demand and as economic circumstances dictate.

We note that Figure 9.1 (Areas for SIL Intensification) includes a "*Placeholder for Diagram*". This Diagram is required in order to establish where intensification will primarily be sought.

In consideration of the above, whilst HBD do not contest the principle of intensifying existing industrial sites, they urge the Council to take a more well-rounded and comprehensive approach to what constitutes "*intensification*" and how this might be delivered. In the absence of any evidence to the contrary, clarity is sought as to the uplift requirements associated with Montagu Industrial Estate specifically.

In accordance with **Paragraph 11 (a) and (b) of the NPPF**, all plans should promote a sustainable pattern of development that seeks to meet the development needs of an area; and all strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses. At present, contrary to Paragraph 11, it is unclear as to how the Council have

objectively calculated need for employment floorspace (at the Borough and local (Site Allocation) level, and greater clarity is required in order to ensure that the Draft Local Plan accords with national policy.

Office Uses

Whilst it is intended that Montagu Industrial Estate will come forward primarily for general industrial, storage and distribution uses (Use Classes B2 and B8), an element of office floorspace (Use Class E(g)) will be required to complement and support these uses. For example, as was the case with Phase One (which comprises flexible B1 (now E(g)), B2 and B8 use), a small amount of office floorspace may be required within each unit.

It should be noted **London Plan Policy E4** highlights that SIL and LSIS locations are considered acceptable for light industrial uses falling under Use Class B1 (now E(g)). **Policy E4 (A) (8)** directly encourages “flexible (B1c/B2/B8) hybrid space to accommodate services that support the wider London economy and population”. Furthermore, Draft Local Plan **Policy SP E3 (A) (b)** references that “ancillary office use” is acceptable in SIL.

In accordance with HBD’s aspirations for the Montagu Industrial Estate, and to ensure consistency between Local and London Plan policies, we request that **Policy E4 (Supporting Offices)** is amended to reflect the fact that offices should be considered acceptable outside of Town Centre Locations, such as within designated Employment Sites.

Social Infrastructure Uses

Strategic Policy SP SC2 (Protecting and Enhancing Social and Community Infrastructure) states that:

“Development involving the loss or release of a community building or use to other uses will not be supported unless evidence can be provided as part of the planning application to demonstrate it has been:

- a) *offered to the market for the range of existing lawful uses (typically non-residential institutions, such as places of worship, schools and community halls) over a 12-month period, at a market rent or sale price benchmarked against other equivalent properties in the area;*
- b) *declared surplus to requirements or adequate replacement provision can be provided elsewhere;*
- c) *shown to be unsuitable in size and scale to its location which already has good access to facilities which meet similar local needs where these arise; and*
- d) *the opportunities to share the use of the existing site or co locate services have been fully explored and are shown to be impractical”.*

At present, **Policy SP SC2** is drafted in a way which would require an Applicant to meet all four of the above policy tests, which would be onerous and unnecessary. If an Applicant was to demonstrate through 12 months of marketing that there was no demand for a community use within that given location, it would be pointless to provide a replacement facility elsewhere or explore co-location. Similarly, if an Applicant was unable to provide marketing evidence, but was able evidence that the community use was unsuitable in terms of use, size and scale (as per the below), then the loss of the use should be considered acceptable. Furthermore, we recommend that “and” is replaced by “or” to reflect the fact that Applicants should only need to demonstrate compliance with one of the above policy tests. This amendment would result in **Policy SP SC2** better reflecting **Policy 17 of the adopted Development Management Document** and **Policy S1 of the London Plan**.

HBD recommend that (c) be amended to include “land use” (i.e. “shown to be unsuitable in use, size and scale”) to reflect the fact that some community uses are located in wholly unsuitable areas, and have negative impacts on residential amenity, the local environment, the deliverability of priority land uses / site allocations. In the case of the Montagu Industrial Estate, there are community uses on site that are completely contrary to the Sites allocation as SIL, and in conflict with the Council’s aspirations to significantly intensify industrial uses. On the basis that the community uses are operational, as currently drafted, under this policy it would not be possible to secure the loss of these uses; despite the loss being integral to the deliverability of the Site Allocation.

Supporting Text Paragraph 5.2.2 states that “where the loss of a community use can be justified, the applicant will need to explore the opportunity to accommodate an alternative community use which would better meet local needs”. As explained above, this should be amended to highlight the fact that some locations are not suitable for continued community use (by virtue of locational factors, residential amenity and site allocations).

Sustainability

HBD support the Council's ambition of responding to the climate emergency, by encouraging innovative approaches to tackling climate change, reducing air pollution, managing flood risk and supporting sustainable infrastructure (**Strategic Policy SP SE1**).

Policy DM SE2 (3) explains that *"non-residential development with a combined gross floorspace of 1,000 square metres floorspace or more must work towards achieving Building Research Establishment Environmental Assessment Method (BREEAM) 'outstanding' with a minimum certification level of 'excellent'"*. Whilst HBD do not object to this policy in principle, **Policy DM SE2 (3)** should be caveated to note that BREEAM "Outstanding" or "Excellent" may not be achievable on all developments, owing to site constraints and viability. HBD are particularly concerned given that it is typically very challenging to secure BREEAM "Excellent" for industrial schemes.

In turning to **Policy DM SE5** (Greenhouse Gas Emissions and Low Carbon Energy Supply), we note that non-residential development of 500 sq. m. GIA or more, will be required to be net zero with a 45% on-site reduction in carbon emissions. This is significantly higher than the London Plan requirement of a net reduction of 35%, as set out in Policy SI 2). For consistency, we would recommend Policy DM SE5 being amended to reflect the more practical and viable targets included within the London Plan.

Policy DM SE5 (5) explains that *"development proposals will be expected to address an area's energy infrastructure requirements, as identified in the Infrastructure Delivery Plan. Developments should seek to connect to a decentralised energy network where the operator is willing to extend. All such developments shall comply with the Enfield Decentralised Energy Networks Supplementary Planning Document and any updating successor". Policy DM SE5 (6) adds that "if connection to a decentralised energy network is not possible, large-scale major developments proposals (200 or more dwellings or 10,000sqm or more non-residential) will be expected to consider the integration of new energy networks in the development, with consideration for future connection to the boroughs heat network. This consideration shall form part of the development proposals and take into account the site's characteristics and the existing cooling, heat and power demands on adjacent sites where readily available"*.

Supporting Text Paragraph 4.5.5 notes that connection to an existing or future Decentralised Energy Network (DEN) will only be sought where *"feasible and viable"*. HBD welcome the acknowledgement that DEN is not always possible, owing to issues regarding viability, feasibility and practicalities, and request that this is added to the Policy itself.

Summary

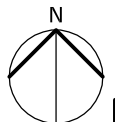
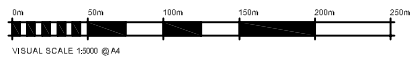
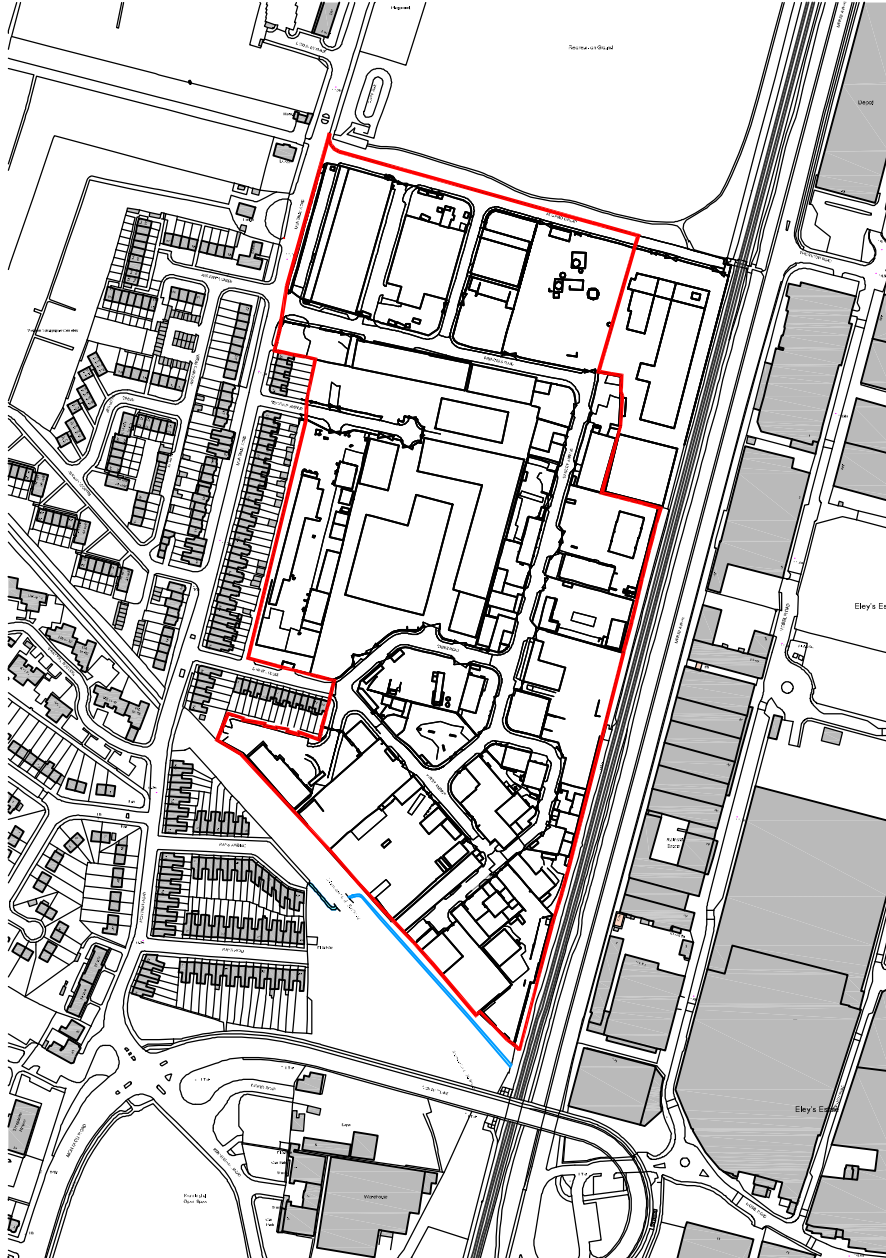
Having reviewed the Regulation 18 Draft Local Plan (Issues and Options), our client is generally supportive of the emerging policies; the Council's growth aspirations; and the Council's ambitions to make qualitative and quantitative improvements to SIL and LSIS. However, a number of clarifications and amendments are sought in order to ensure that policies are justified and sound; and to reflect national and London Planning Policy.

HBD's main concerns relate to the allocation of Montagu Industrial Estate (ref. SA51). The red line plan for this allocation should cover the entirety of the Industrial Estate, in order to ensure that the Estate can be comprehensively redeveloped, as encouraged by the ELAAP. Further clarification is also sought regarding how site capacity has been calculated. Whilst HBD appreciate LB Enfield's ambitions to intensify existing industrial sites, such intensification needs to be managed carefully, in order to ensure that sites like Montagu Industrial Estate remain functional, and of a high-quality. The proposed uplift of 38,600sq.m is substantial, and needs to be considered alongside other policy aspirations (i.e. to reprovide waste capacity, deliver public realm improvements, SUDS features etc.), and supported by a more robust evidence base.

Should you require any further detail/clarification at this stage, please do not hesitate to get in touch myself at this office. We are looking forward to continuing our discussions with LB Enfield to assist the Council in working towards preparing a sound and deliverable Local Plan.

Yours sincerely,

Appendix A – Site Location Plan



A4

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Jefferson
Sheard
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Project
**Montagu Industrial Estate
Enfield**

Drawing
Location Plan

Scale
1:5000

Date
05/20

Ref.
No.1103-JSA-XX-XX-DR-A-00001

Drawing Purpose
PLANNING SUBMISSION

Status
S5

Rev **P2** Drawn **MU** Check **JD**

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Application Boundary

P2	12/05/20	Drawn:MU	Check:JD
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Application Boundary Amended

P1	06/05/20	Drawn:MU	Check:JD
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Initial Issue