

13 September 2021

Planning Department
London Borough of Enfield
Silver Street
London
EN1 3XA

Dear Sir / Madam

**Re: Langhedge Lane Industrial Estate
Representations to the London Borough of Enfield Draft Local Plan Regulation 18
Consultation**

We hereby submit representations to Enfield's Draft Local Plan Regulation 18 consultation. This submission specifically relates to Langhedge Lane Industrial Estate, Langhedge Lane (the 'Site') which is a Locally Significant Industrial Site located on the west side of Langhedge Lane in the London Borough of Enfield ('LBE') near its southern boundary with the London Borough of Haringey ('LBH'). These representations have been prepared by Boyer on behalf of the landowner, and set out our client's response to a number of items in the draft Local Plan and provides commentary on the relevant policies.

The Site is in a highly accessible and sustainable location in close proximity to Angel Edmonton town centre (approximately 250m). The Site borders the southern boundary of the Joyce Avenue and Snells Park estate and, given the importance of the regeneration of this estate to the wider regeneration of Angel Edmonton, the Site will also play an important role in the regeneration of Angel Edmonton.

The emerging Joyce Avenue and Snells Park proposals are of great significance in relation to the context of the Site, particularly given that the emerging proposals present a number of potential layout and massing constraints which will result in a negative impact on the quality of the Site. Specifically, the current designs display a lack of consideration and integration of the Site, as the placement of the southern block creates a lack of interaction between the two sites and restricts the potential to create a high quality urban realm.

These representations aim to highlight the importance of the Site in the context of the emerging Joyce Avenue and Snells Park regeneration proposals, and how the Site should be considered as a logical complimentary extension to the proposals. To allow for a coordinated regeneration approach, and to increase connectivity between LBH and LBE, the Site should be considered a key player in the overarching strategy of the area.

The Site also has the potential to be brought forward within the next 5 years, contributing to LBE's

housing need and catalysing the regeneration of Angel Edmonton. A pre-application request was submitted on 9 June 2021, with the pre-application meeting having been held on 9 September 2021. This highlights how the Site can be brought forward and delivered in the early part of the Plan period as the applicant is keen to progress the Site.

Draft Strategic Policy PL4 Angel Edmonton

Draft Strategic Policy PL4 outlines Angel Edmonton's placemaking vision which recognises that development should: contribute to the process of regeneration; provide small spaces for small business, culture and community; contribute to creating a mixed-use place; provide employment uses; facilitate improving connections between Silver Street Station and Fore Street; and, contribute towards delivering improvements to the walking and cycling environment.

Does the vision for Angel Edmonton set out an appropriate vision for the future of this place? If not, what components do you think should be changed or are missing?

It is encouraging to see that the Council recognises the need for the regeneration of this part of the Borough. We are supportive of this approach and emphasise the important role that mixed-use employment locations and their successful redevelopment can have for an area. A successful redevelopment of an employment site for a mix of commercial and residential uses can bring substantial and important benefits to both the local area and the Borough as a whole by bringing an underutilised site back into a viable use. Redevelopment of such sites can result in the creation of more jobs in the Borough by making a more appropriate and efficient use of employment floorspace and the residential element will help the Council meet housing targets as well as bringing more inward investment for the Borough.

Figure 3.5 sets out Angel Edmonton's placemaking vision, and highlights the placemaking area, the site allocations and a number of other area-based designations. The Site lies adjacent to the placemaking area, which lies to the north, and is adjacent to the boundary of LBH, which lies to the south. Therefore, this policy does not include the Site. We consider that the inclusion of the Site into Angel Edmonton's placemaking vision would be a logical extension to the placemaking area, and would help to create a coherent environment.

Will the proposed placemaking policy for Angel Edmonton help to adequately deliver the aspirations set out in the vision? If not, what proposed changes, omissions or additions are required in the policy to help deliver the vision?

We consider that the proposed placemaking policy for Angel Edmonton will help to adequately deliver the aspirations set out in the vision. The proposed placemaking policy also supports the inclusion of the Site in Angel Edmonton's placemaking visions for reasons outlined below.

Part 1 of the policy outlines how development must contribute to a coordinated process of regeneration that responds positively to the unique context and characteristics. The inclusion of the Site into Angel Edmonton will enable the coordinated process of regeneration due to the Site's close proximity to Joyce Avenue and Snells Park which will be regenerated over the next 10 years. Regenerating the Site would therefore be a logical step to providing a coordinated approach to regeneration in the area. Furthermore due to the Site's location on the boundary of LBE and LBH,

and the recent Cannon Road redevelopment, the redevelopment of the Site would enable coordination across the boroughs.

Part 3 of the policy outlines how development must contribute to creating a thriving mixed-use place offering a range of housing typologies, which may include dense forms of residential development. The inclusion of the Site into Angel Edmonton will allow the vision to be delivered as there is scope for a mixed-use development on the Site which incorporates an important element of commercial development, and the provision of homes to meet LBE's housing targets. The inclusion of the Site would also allow the Site to be better integrated into the surrounding, mainly residential, area whilst providing commercial floorspace.

Part 7 of the policy sets out how development must contribute towards and/or facilitate improving connections between Silver Street Station and Fore Street including markers for intuitive wayfinding, a variety of public realm spaces which are pedestrian and cycle friendly integrated with existing street and movement patterns. Part 8 of the policy outlines how development must contribute towards delivering improvements to the walking and cycling environment. Including the Site in Angel Edmonton will enable these policies to be better realised as it is a key site which connects LBE and LBH. The current layout of the site does not allow for permeability and intuitive wayfinding for pedestrians or cyclists. Including the site within Figure 3.5 will allow for the improvement of the public realm, and thus enable permeability, pedestrian connectivity and cycle friendly space.

Paragraph 3.4.7 outlines how Angel Edmonton currently experiences relatively high crime and anti-social behaviour and how development, through good design, should encourage passive surveillance of the street and reduced opportunities for crime. The inclusion of the Site in Angel Edmonton would encourage passive surveillance of the street and reduced opportunities for crime as it would result in the improvement of the public realm, increased permeability, pedestrian connectivity and activity.

Draft Policy DM DE6 Tall buildings

Draft Policy DM DE6 sets out the areas where tall buildings could be acceptable, and the design qualities that proposals must demonstrate. Figure 7.4 identifies these areas where they could be acceptable along with indicative maximum heights. Proposals involving tall buildings must demonstrate how they will: be of the highest architectural and urban design quality; relate well to the character of the immediate context and surroundings; not harm the significance of heritage assets; provide high quality private and communal amenity and play space; activate the street frontage; be carefully sited; avoid adverse impacts on the microclimate and amenity of the site and surroundings area; and provide a positive contribution to the skyline.

We are pleased to see that the Council recognises the value of the Silver Street cluster of tall buildings and that, in paragraph 7.6.1, the Council recognises that there are significant opportunities to optimise the provision of new homes and businesses while providing a form of development at a human scale which is responsive to the surrounding context.

The policy recognises the importance of the London Plan criteria for tall buildings which includes 3 considerations. The first is that the appropriate height of tall buildings must always be proportionate to the level of importance of the location. Some height may be appropriate to respond to the scale of existing infrastructure and height should be consistent with the importance of these locations. The

second consideration is that the location should be near or within a town centres. Proportionate height may also be acceptable in larger local centres and tall buildings might be considered in close proximity to town centres if within a short walking distance and appropriate within the context. The third consideration is the location should have good public transport access (PTAL 4 and above).

In accordance with the London Plan criteria for tall buildings, the Site is located adjacent to the Silver Street cluster and therefore is located in an area where height would be appropriate to the scale of the surroundings. Considering that the Site is located in close proximity to Angel Edmonton town centre (approximately 250 meters) and has a PTAL of 4, provides evidence as to the appropriateness of the Site being included in the Silver Street cluster in Figure 7.4.

Part 2 of Draft Policy DM DE8 Design of Business Premises

Part 2 of Draft Policy DM DE8 outlines how proposals involving co-location with residential uses will be supported where overlooking between residential and industrial units is ensured and good quality amenity space is provided. Proposals should incorporate measures to ensure acoustic and other environmental mitigation, and address movement, access and servicing by separating routes for different uses.

It is encouraged and welcomed to see that the Council realise the significant opportunity that proposals involving co-location with residential use have in delivering high quality, mixed use neighbourhoods.

Mixed-use development comprising commercial at ground with residential above is a well-established principle of planning and such developments have been successful, and are prominent, throughout London. The residential element of such schemes can complement and facilitate the commercial element and can bring significant planning benefits such as increasing the Borough's housing supply. Furthermore, a primary aim of planning policy is for development proposals to make the best and most efficient use of land. It is therefore welcomed and supported to see that the Council require development proposals to optimise the use of land and capacity of sites through co-location.

Draft Strategic Policy SP H1 Housing Development Sites

Draft Strategic Policy SP H1 sets out the borough's target of 24,920 homes to be delivered over the plan period, equating to 1,246 homes per year. Table 8.1 sets out the sites allocated for housing development and Appendix 3 sets out the details of the site allocations including the timeframe for delivery.

LBE have an urgent need for deliverable housing as a result of failing to meet their housing requirement in recent years. It is particularly important for this housing to be deliverable in the short term and early part of the plan period. It is also important for LBE to build contingency into their site allocations. Therefore, it is imperative that LBE take a positive approach to housing.

Excluding the Meridian Water development, which will be delivered over the next 10 years, the overwhelming majority of sites are to be delivered between 5-10 years (approximately 9,451 homes) and 10+ years (approximately 8,646 homes), with only a small number of homes able to be delivered between 0-5 years (approximately 454 homes). There are clearly not enough sites

allocated for housing development deliverable between 0-5 years to achieve the target of 1,246 homes per year. Therefore, the draft Plan does not demonstrate how LBE will achieve their housing requirement in the early part of the Plan period, and highlights how there is a need for short term deliverable sites.

The Site is capable of providing approximately 200 homes within the next 5 years which would make an important contribution to the provision of homes in the short term; furthermore, the Site could be encouraged forward sooner to ensure that LBE can achieve their housing targets in the early part of the Plan period. Given that this brownfield site is available and suitable for development within the next 5 years, we consider that the Site should be allocated. Allocating the Site will provide an opportunity to help make up the shortfall in homes that have failed to be delivered in recent years.

The Site is located in an area which is undergoing significant regeneration and change, and therefore allocating the site for mixed-use development including housing would enable coordinated regeneration across the area. The Site lies adjacent to the recently redeveloped Cannon Road development in LBH, and also lies adjacent to the allocated Joyce Avenue and Snells Park Estate, where regeneration proposals are emerging. The recently-developed Tottenham Hotspur Football Club Stadium development in LBH, which has acted as a catalyst for wider regeneration and improvement in the area, is within walking distance. The Lord Graham Mews and Prowse Court development is also within walking distance of the Site. Therefore, the redevelopment of the Site will run complementary to the redevelopment of adjacent sites and will contribute to the coherent and coordinated regeneration of the area.

Moreover, allocating the Site will align with including the Site in the placemaking vision as part of Draft Strategic Policy PL4. Allocating the Site would allow for 200 homes to be brought forward in an area undergoing lots of change. Therefore, including the Site in the wider vision for Angel Edmonton will allow for greater coherence and consistency across Angel Edmonton as the Site will run complementary to other sites in the area being brought forward for redevelopment.

Draft Strategic Policy SP E3 Protecting Employment Locations and Managing Change

Draft Strategic Policy SP E3 outlines how the Council will safeguard Locally Significant Industrial Locations (LSIS) and how proposals for non-industrial type uses in LSIS must not compromise the business function of the site. Proposals which result in a net loss of light and general industrial, storage and distribution, research and development and related sui generis floorspace in LSISs will be refused. This policy also outlines how proposals for the redevelopment of designated areas will be supported where they meet the criteria set out above and how, where sites are redeveloped, scope for intensified industrial floorspace should be prioritised over other forms of development.

We generally support and welcome this proposed policy however we would advocate for the consideration of London Plan Policy E7 Industrial Intensification, Co-Location and Substitution. London Plan Policy E7 outlines how, in LSIS (but not in SIL), the scope for co-locating industrial uses with residential and other uses may be considered provided that: the industrial and related activities on-site and in surrounding parts are not compromised in terms of their continued efficient function, access, service arrangements and days/hours of operation; the intensified industrial, storage and distribution uses are completed in advance of any residential component being

occupied; and, appropriate design mitigation is provided in any residential element to ensure compliance with industrial activities.

Co-location development provides a significant opportunity to deliver high quality, mixed use neighbourhoods. Mixed use development comprising commercial at ground with residential above is a well-established principle of planning and such development have been successful, and are prominent throughout London. The residential element of such schemes can complement and facilitate the commercial element and can bring significant planning benefits such as increasing the Borough's housing supply. Furthermore, a primary aim of planning policy is for development proposals to make the best and most efficient use of land; co-location enables the optimal use of land and capacity of sites and therefore is a logical way of achieving the primary aim of planning policy.

Summary

These representations have been made on behalf of the landowner in response to the recent publication of Enfield's Regulation 18 "Main Issues and Preferred Approaches" Local Plan Document. The document details draft policies, which are intended to guide future development within the London Borough of Enfield.

Whilst we are in general support of the proposed policies, we feel that including the Site in Angel Edmonton's placemaking vision (Draft Strategic Policy PL4), as well as allocating the Site for residential-led mixed-use development (Draft Strategic Policy SP H1) would allow for coordinated regeneration across Angel Edmonton and the neighbouring borough of LBH. The Site is available to come forward in the next 5 years to provide 200 much needed homes to address LBE's housing requirement. We also support the inclusion of the Site in the Silver Street cluster of tall buildings, given that it is within 250m of Angel Edmonton town centre and has a PTAL of 4.

It is vital that the Site is considered alongside the Joyce Avenue and Snells Park estate regeneration proposals given the proximity of the two sites and the potential they have in contributing to the coordinated regeneration of Angel Edmonton. The Site should logically run complimentary to any emerging proposals at Joyce Avenue and Snells Park, especially given that the Site can be brought forward in the early part of the Plan period.

I trust the above is sufficient in the first instance but should you require any further information or need clarification on any of the points raised, please do not hesitate to contact me.

Yours sincerely