

# Public Document Pack



## PLANNING COMMITTEE

Tuesday, 21st October, 2014 at 7.30 pm  
Venue: Conference Room,  
The Civic Centre, Silver Street,  
Enfield, Middlesex, EN1 3XA

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## MEMBERS

Councillors : Abdul Abdullahi, Lee Chamberlain, Dogan Delman, Christiana During, Christine Hamilton, Ahmet Hasan, Suna Hurman, Derek Levy, Andy Milne, Anne-Marie Pearce, George Savva MBE and Toby Simon (Chair)

**N.B. Any member of the public interested in attending the meeting should ensure that they arrive promptly at 7:15pm**

**Please note that if the capacity of the room is reached, entry may not be permitted. Public seating will be available on a first come first served basis.**

**Involved parties may request to make a deputation to the Committee by contacting the committee administrator before 12:00 noon on 20/10/14**

## AGENDA – PART 1

9. **14/02806/OUT - STONEHILL ESTATE, SILVERMERE DRIVE, N18 3QH**  
(Pages 3 - 76)

RECOMMENDATION: Refusal  
WARD: Upper Edmonton

**SENT TO FOLLOW**

10. **14/02807/FUL - UNIT 2, 3A & 3B STONEHILL BUSINESS PARK, SILVERMERE DRIVE, N18 3QH**

RECOMMENDATION: Refusal  
WARD: Upper Edmonton

**SENT TO FOLLOW**

11. 14/02808/FUL - STONEHILL ESTATE, THE TRIANGLE SITE,  
SILVERMERE DRIVE, N18 3QB

RECOMMENDATION: Refusal

WARD: Upper Edmonton

**SENT TO FOLLOW**

**LONDON BOROUGH OF ENFIELD****PLANNING COMMITTEE****Date :** 21st October 2014**Report of**Assistant Director, Planning,  
Highways & Transportation**Contact Officer:**Andy Higham 020 8379 3848  
Sharon Davidson 020 8379 3841  
Mr Cuma Ahmet 020 8379 3926**Ward:**

Upper Edmonton

**Category:** Outline Application**Reference & Location****14/02806/OUT** Stonehill Estate, Silvermere Drive, London, N18 3QH**14/02807/FUL** Units 2,3a & 3b Stonehil Business Park, Silvermere Drive N18 3QW**14/02808/FUL** Stonehill Estate, The Triangle Site, Silvermere Drive N18 3QB**Proposals****14/02806/OUT**

Redevelopment of site to provide up to 46,451 sq m of industrial floorspace (B1c), (B2) and or (B8) (OUTLINE with some matters served- ACCESS)

**14/02807/FUL**

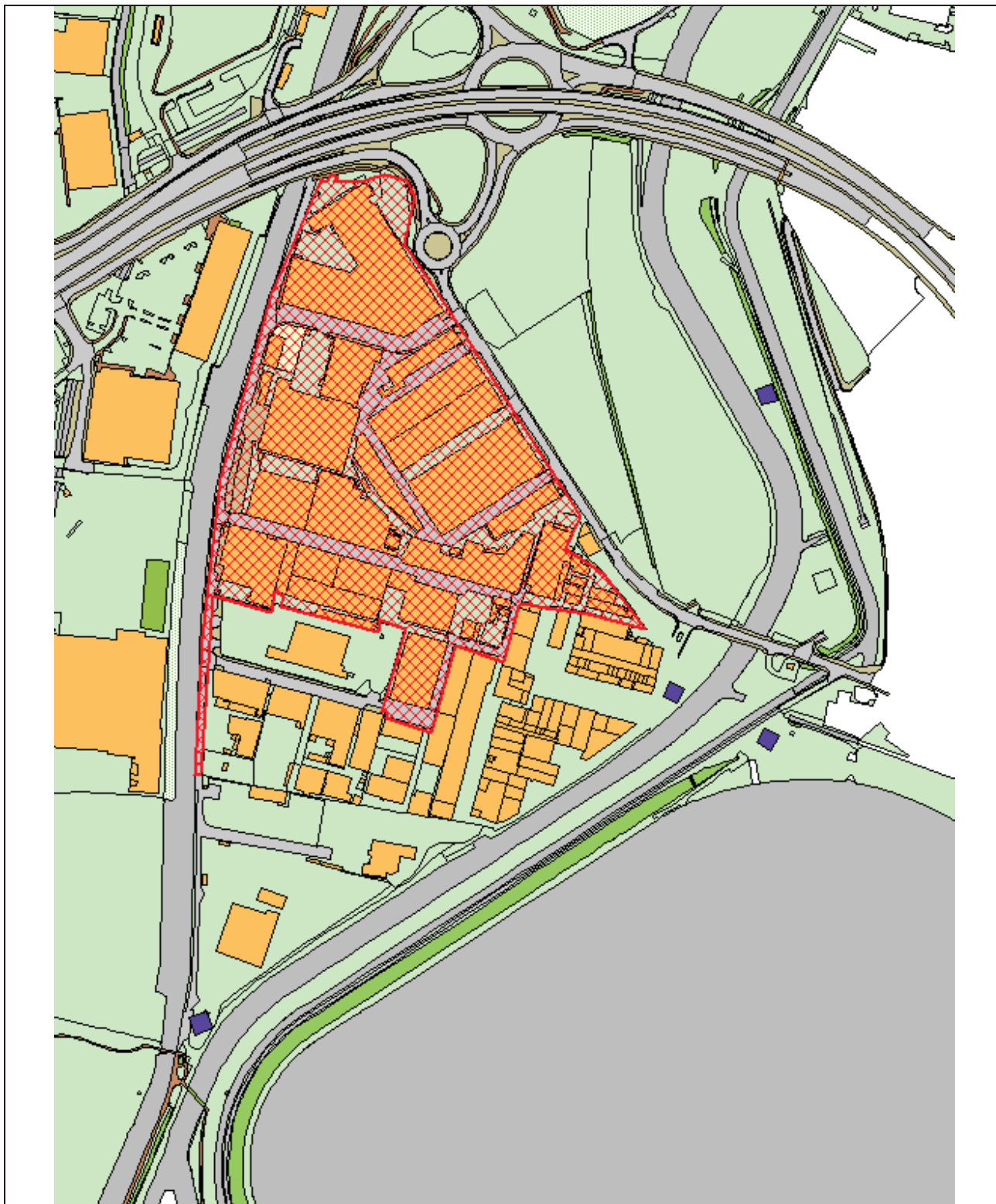
Redevelopment of site to provide 2,161 sq m of light industrial (B1c) and/or storage and distribution (B8) floorspace with ancillary showroom and office floorspace and associated car parking to rear.

**14/02808/FUL**

Redevelopment of site to provide 2,201 sq m of light industrial (B1c) and/or storage and distribution (B8) floorspace, including ancillary showroom and office floorspace, with associated car parking and access arrangements.

**Applicant Name & Address:**Stonehill Estate  
Silvermere Drive  
London  
N18 3QH**Agent Name & Address:**Simon Roberts  
Stonehill Estate  
Silvermere Drive  
London  
N18 3QH**RECOMMENDATION:**

It is recommended that each application be refused.



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## 1. Site and Surroundings

- 1.1 Stonehill Business Park (also known as the Harbet Road Industrial Estate) is a 10.94 hectare (27 acres) mixed employment site comprising B1, B2 and B8 uses situated in the south east part of the Borough. Part of it also falls within the Lee Valley Regional Park.
- 1.2 The site is designated as a Strategic Industrial Location in the London Plan and in the Council's adopted Core Strategy. The site also falls within a strategic growth area as defined by the Mayor of London's Upper Lee Valley Opportunity Area, within which the Central Leaside and Meridian Water regeneration areas are identified.
- 1.3 Harbet Road bounds the eastern periphery of the site which provides the only access to the North Circular Road (A406). Towpath Road and Anthony Way bound the west and south boundaries respectively. The River Lee Navigation and River Lee Diversion enclose the site to its west, north and east.
- 1.4 In terms of the built form, the site is composed of a variety of building types mostly ranging between 2 and 3 storeys in height. The 7-8 storey Lee Valley Business Centre was sited to the northern corner of the site before its demolition.
- 1.5 The site also incorporates a small area of land to the east of Harbet Road which is currently used as a car park. Notwithstanding this, the land which lies within the Lee Valley Regional Park is designated as Green Belt.

## 2. Proposals

- 2.1 There are three separate planning applications that have been submitted. Each of these will be assessed simultaneously in this report with recommendations set out separately. The proposals are as follows:

- 2.2 Application No.1 Planning Reference 14/02806/OUT)

**Redevelopment of site to provide up to 46,451 sqm of industrial floorspace (B1c), (B2) and or (B8) (OUTLINE with some matters reserved - ACCESS).**

- 2.2.1 This is an outline planning application for the redevelopment of the site to provide a total floorspace of up to 46,451 sq m (500,000 sq ft). As part of the development, all of the existing buildings onsite, comprising approximately 53,297 sq m (573,688 sq ft) of floorspace, would be demolished. The resulting total floorspace would reduce by 6,846 sq m (73,688 sq ft). All matters will be reserved except for access.
- 2.2.2 The proposed floorspace would be used as either light industrial (B1c), general industrial (B2) or storage and distribution (B8) or a mix of the above uses.
- 2.2.3 The applicant's "Parameters Plan" illustrates the extent of the developable area of the site and sets the maximum single building footprint of 29,750 sq m (320,000 sq ft).
- 2.2.4 Further illustrative layout plans demonstrate how the proposed development could be arranged on the site, showing a variety of unit sizes.

2.3 Application No.2 (Planning Reference 14/02807/FUL)

**Redevelopment to provide 2,298 sq m (GEA) of light industrial (B1c) and/or storage and distribution (B8) floorspace, including ancillary showroom and office floorspace with associated car parking and access arrangements.**

2.3.1 This is a full details application seeking planning permission to erect a single storey warehouse building with 1968 sq m (21,185 sq ft) floorspace at ground floor and a mezzanine floor of 330 sq m (3,550 sq ft). the warehouse would contain ancillary showroom and office floorspace.

2.3.2 18 car parking spaces would be provided, including 2 disabled spaces, accessed from a new access on Silvermere Drive to the west of the proposed building.

2.3.3 A second vehicular access on Silvermere Drive, located to the east of the proposed building, would provide access to the gated service area with docking space for 2 service vehicles.

2.4 Application No.3 (Planning reference 14/02808/FUL)

**Redevelopment to provide 2,201 sq m (GEA) of light industrial (B1c) and/or storage and distribution (B8) floorspace including ancillary showroom and office floorspace with associated car parking and access arrangements.**

2.4.1 This is a full details application seeking planning permission to erect a single storey warehouse building with 1,888 sq m (20,325 sq ft) floorspace a ground floor and a mezzanine floor of 313 sq m (3,365 sq ft). the warehouse would contain ancillary showroom and office floorspace.

2.4.2 18 car parking spaces would be provided, including 2 disabled spaces. These would be accessed from a new access on Rivermead Road to the north of the proposed building.

2.4.3 A second vehicular access on Rivermead Road, located to the south of the proposed building, would provide access to the gated service area with docking space for 2 service vehicles.

**3. Relevant Planning Decisions**

3.1 There is only 1 relevant application that is of particular relevance to these application submissions, the detail of which is noted below:

**P14-01827PRE:** The Council received a pre-application enquiry proposing redevelopment of site to provide industrial, distribution and business units comprising up to 46,451 sq m (GIA) of light industrial (B1c), and / or general industrial (B2) and / or storage and distribution (B8) floorspace, including ancillary office floorspace, with associated car parking and access arrangements together with development of Silvermere site and Triangle site for light industrial (B1c) and / or storage and distribution (B8) floorspace, including ancillary showroom and office floorspace, with associated car parking and access arrangements. After consideration, the response was issued 18/7/14 and in essence, both in this



response and in a pre-application meeting prior to submission, concerns were expressed regarding the principles of the development relative to the Master Plan and the emerging Central Leaside Area Action Plan including strategic guidance set out in the London Plan and Upper Lee Valley Opportunity Area Planning Framework.

## **4. Consultations**

### **4.1 Statutory and non-statutory consultees**

#### **4.1 Greater London Authority (GLA)**

4.1.1 Consultation with the Mayor's Office is a two stage process. The following comments (included in Appendix A of this report) have been received in response to the stage one consultation and relate to the "Outline" planning application only.

4.1.2 The proposals set out in this application are supported by London Plan Policies having regard to the principle of development, employment, urban design, flooding, inclusive access, sustainable development and transport. However, further information is required in order to address areas of non-compliance with the London Plan, the details of which are set out below:

- Principle of development: The proposals are supported in strategic terms and are in accordance with London Plan Policy 2.17, the Upper Lee Valley Opportunities Area Planning Framework (ULVOAPF), and the draft Central Leaside Area Action Plan (CLAAP), seeking to retain and improve the quality of London's industrial land. The proposals also respond to current market demand and will result in a significant improvement in the quality of employment floorspace.
- Employment: Whilst there would be a reduction in the quantum of employment floorspace, there would be a significant improvement in its quality, with a more efficient layout and subsequent increase in employment density, which is supported in strategic terms.
- Urban Design: The design code should include further detail on ground floor uses and building frontages and commit to locating smaller commercial units, offices or service desks along street and canal edges to promote pedestrian footfall and maximise activity. Opportunities for extending the public realm along Towpath Road at the northern boundary of the site, creating a buffer zone with the North Circular should be explored further.
- Flooding: The site is at risk of flooding, although given the nature of the proposed land uses and the mitigation measures suggested, the proposals are acceptable in flood risk terms from a strategic perspective. The resilience of the buildings could be further improved with some relatively easy and minimal cost flood resilient design measures and it is recommended that these are included in the detailed building design.
- Inclusive access: The Council should ensure that at the detailed stage of the application, the proposals include inclusive access principles and conditions should be attached to secure these principles.

- Climate change: The energy hierarchy has been followed, the applicant is proposing to meet London Plan Policy 5.2 by efficiency and renewables. The carbon emissions and savings should be resubmitted using Part L 2013 and the comments above should be addressed before compliance with London Plan energy policy can be verified.

#### 4.2 Strategic Planning & Design

4.2.1 In terms of the proposed developments acceptability against current local and strategic policies, it shall be noted that the site is located within the Meridian Water regeneration area, which is essential to meeting the medium and long-term needs and aspirations of the borough and London through the provision of up to 5,000 new homes, 3,000 new jobs and a greatly enhanced infrastructure.

4.2.2 The proposal lies within the Harbet Road Industrial Estate, to the south of the North Circular Road (A406), east of the Lee Navigation and west of the Lee Valley Regional Park. The site is designated as Strategic Industrial Location (SIL) in the Core Strategy (2010) and London Plan (2011) and currently contains a range of industrial uses. The key points of planning policy are as follows:

- The proposal ignores and overlays the Causeway route and as such it is contrary to Core Policy 38, the Mayor's ULVOAPF, the Meridian Water Masterplan (2013) and the Proposed Submission Central Leaside Area Action Plan (2014) policy CL1.
- The proposal partially overlays the area designated for housing at the southern part of Harbet Road, reducing the potential number of homes and as such is it contrary to the MW Masterplan and the Proposed Submission CLAAP Policy CL8.
- The proposal fails to address the impact of inappropriate industrial uses on the viability of the residential neighbourhoods which will lie immediately to the south and west of the proposed site, contrary to the MW Masterplan and the Proposed Submission CLAAP policy CL8.
- The proposed land uses of B1c, B2 and B8 do not contravene the land use policy requirements of Core Policy 14 and DMD 19.
- The proposal fails to address the need to significantly increase job density of the industrial site and to provide for new industries of a nature appropriate to the requirements set out for Meridian Water in core policies 13 and 38, the MW Masterplan and Proposed Submission CLAAP policies 8 and 10.
- The existing and potential job numbers set out within the proposal are questionable, with the applicant showing a very optimistic outcome that would still fall below the increase required by the MW Masterplan and Proposed Submission CLAAP policies 8 and 10.
- The proposal fails to properly address the treatment of the Towpath Road waterside area as it lacks provision for cyclists and pedestrians, as required by Core Policy 25 and Proposed Submission CLAAP policies CL8 and CL26. The proposal also fails to meet the landscape improvement requirements of the MW Masterplan, Core Policies 30, 37 and 38, and Proposed Submission CLAAP policy CL8. It should be noted that the maps provided in the application for the treatment of the Towpath Road area are illustrative only.

- With regard to connection to the Lee Valley Heat Network, a connection is both desirable and necessary and the proposal does not comply with policies DMD 52 and CL30.
- The full applications for the smaller sites do not provide designs that are of a scale and massing which are sympathetic within their surroundings, and they do not provide an easily accessible layout that is easy to move through, and which prioritise people before motor vehicles, contrary to policies DMD 37 and 39.

4.2.3 Planning Policy considers that this proposal would have a very significant negative impact upon the vital Meridian Water regeneration project and therefore recommends the proposals are refused.

4.24 To assist, comments on policy from the Council's Strategic Planning & Design team are attached in Appendix B to this report.

#### 4.2.5 Transport for London (TfL)

4.2.6 TfL require further information on how the outline proposals fit into the wider Meridian Water Masterplan, in particular the opportunities to improve bus accessibility through the site and other operational bus aspects to ensure the future regeneration of the wider area. TfL encourage the use of the Lee Navigation for freight, and requests further technical information related to on and off site car parking, employee numbers, mode of travel to work within the employment catchment area, cycle parking, pedestrian, cycle routes, road safety audits, and swept paths for HGVs/buses. The travel plan, delivery and servicing plan and construction logistics plan should be secured by condition or within the s106 agreement.

#### 4.3 Traffic and Transportation

4.3.1 Traffic and Transportation object to the proposals in terms of their compatibility with the delivery of the Causeway and Angel Bridge which results in the achievement of a comprehensive and integrated transport connection between Meridian East and Canal Side West. In isolation of the aims and objectives of the Meridian Water Masterplan (MWMP), each application would not raise issues in terms of means of access, trip generation, free flow of traffic, and parking subject to relevant planning conditions and obligations that secure delivery of highway improvements that are not currently comprised as part of each proposal.

#### 4.4 Environment Agency

4.4.1 The Environment Agency has raised objections to all three planning applications on the following grounds:

4.4.2 Outline planning application: Applicant has not demonstrated how surface water will be managed sustainably through a Sustainable Urban Drainage Strategy (SuDS). The applicant is therefore required to amend their drainage strategy to include SuDS. No objections are raised in respect of fluvial flood risk at this stage.

4.4.3 Full detailed planning applications: Further information is required to demonstrate that each proposal would not increase flood risk elsewhere.

4.4.4 The applicant is liaising with the Environment Agency to resolve their concerns. The Committee will be informed of any progress made in light of these discussions.

4.5 Environmental Health

4.5.1 No objections to any of the three applications subject to planning conditions that will secure measures to deal with any contamination that may be found including a construction management plan that would consider how dust and noise from demolition will be controlled.

4.6 Canals and Rivers Trust

4.6.1 No objections to any of the three applications as submitted.

4.7 English Heritage

4.7.1 No objections in principle although recommendations cannot be made until further detailed appraisals are submitted to ascertain the impacts on known archaeological assets in the area.

4.7.2 The applicant is liaising with EH to resolve their concerns. The Committee will be informed of any progress made in light of these discussions.

4.8 Lee Valley Park Authority

4.8.1 The LVRPA does not object to the proposals although requests that prior to any approval being granted that Silvermere Drive be of sufficient width with landscaping and space for public square and bridge landing to enable the delivery of the Causeway, Angel Square and Angel Bridge elements of the Meridian Water Masterplan. It further requests that a design code for the site is secured to ensure that the design of the units acknowledges the "sites" sensitive location adjacent to the Regional Park. Planning conditions should be included to ensure adequate protection for water courses from pollution during construction; use of native species in landscaping; measures to reduce light spillage along the navigation corridor and completion of additional ecological surveys included in the Ecological Statement submitted. A s106 should secure funding to aid delivery of elements of the Meridian Water Masterplan.

4.9 Design Out Crime Officer

4.9.1 No objections have been raised although requests that each development proposal adopts the practices of Secure by Design and complies with the physical security and design layout requirements in accordance with current Commercial SBD recommendations.

4.10 Ecology and biodiversity

4.10.1 No objections subject to planning conditions that will secure protection for nesting birds outside the relevant seasons; an updated bat survey to be submitted if development commences before April 2015; landscaping and biodiversity enhancements and exploring the feasibility of green roofs.

4.11 Natural England

4.11.1 No objections to the proposed applications as submitted.

#### 4.12 National Grid

4.12.1 No objections to the proposed applications as submitted.

#### 4.13 Thames Water

4.13.1 No objections to the proposed outline and detailed applications in respect of their impact on existing water and sewerage infrastructure. An informative is recommended to be included highlighting the potential that the development proposals may impact on the presence of an existing water main and should any relocation be required it will be at the applicant's expense.

#### 4.14 Sustainable Design and Construction

4.14.1 Object on the following grounds:

- sufficient justification has not been provided to demonstrate that a BREEAM "Excellence" standard cannot be feasibly achieved;
- inadequate justification for not providing infrastructure to enable connection to the Upper Lee Valley Decentralised Energy Network;
- lack of a robust surface water drainage strategy; and
- More information is required detailing how photovoltaics can be utilised to reduce carbon consumption.

4.14.2 Further potential exists to incorporate green roofs and living walls and this should also be looked at further by the applicant.

#### 4.15 London Fire and Emergency Planning Authority

4.15.1 No objections subject to each of the proposals complying with design recommendations to ensure access for fire services is considered.

#### 4.16 Public

4.15.1 Letters to adjoining and nearby occupiers were sent in respect of all three planning applications. In addition public notices were displayed on site including press advertisements. The indicated deadline for comments expired on the 26<sup>th</sup> August 2014. No responses have been received to date.

### 5 **Relevant Policy**

5.1 The National Planning Policy Framework (NPPF) published in March 2012 allowed local planning authorities a 12 month transition period to prepare for the full implementation of the NPPF. Within this 12 month period local planning authorities could give full weight to the saved UDP policies and the Core Strategy, which was adopted prior to the NPPF. The 12 month period has now elapsed and as from 28th March 2013 the Council's saved UDP and Core Strategy policies will be given due weight in accordance to their degree of consistency with the NPPF.

5.2 The Development Management Document (DMD) policies have been prepared under the NPPF regime to be NPPF compliant. The Submission version DMD document was approved by Council on 27th March 2013 and has now successfully been through examination. It is expected that the document will be adopted at full Council in November 2014. The DMD provides detailed criteria and standard based policies by which planning applications will be determined, and is considered to carry significant weight

5.3 The policies listed below are considered to be consistent with the NPPF and therefore it is considered that due weight should be given to them in assessing the development the subject of this application.

5.3.1 London Plan (Incorporating Revised Early Minor Amendments)

Policy 2.3 Growth areas and co-ordination corridors  
Policy 2.6 Outer London: vision and strategy  
Policy 2.7 Outer London: Economy  
Policy 2.8 Outer London: Transport  
Policy 2.13 Opportunity areas and intensification areas  
Policy 2.14 Areas for regeneration  
Policy 2.16 Strategic outer London development centres  
Policy 2.17 Strategic industrial locations  
Policy 3.3 Increasing housing supply  
Policy 3.4: Optimising housing potential  
Policy 4.1 Developing London's economy  
Policy 4.2 Offices  
Policy 4.3 Mixed use development and offices  
Policy 4.4 Managing industrial land and premises  
Policy 5.1 Climate change mitigation  
Policy 5.2 Minimising carbon dioxide emissions  
Policy 5.3 Sustainable design and construction  
Policy 5.5 Decentralised energy networks  
Policy 5.6 Decentralised energy in development proposals  
Policy 5.7 Renewable energy  
Policy 5.8 Innovative energy technologies  
Policy 5.10 Urban greening  
Policy 5.11 Green roofs and development site environs  
Policy 5.12 Flood risk management  
Policy 5.21 Contaminated land  
Policy 6.1 Strategic approach  
Policy 6.2 Providing public transport capacity and safeguarding land for transport  
Policy 6.3 Assessing effects of development on transport capacity  
Policy 6.4 Enhancing London's transport connectivity  
Policy 6.5 Funding Crossrail and other strategically important transport infrastructure  
Policy 6.11 Smoothing traffic flow and tackling congestion  
Policy 6.12 Road network capacity  
Policy 6.13 Parking  
Policy 6.14 Freight  
Policy 7.1 Building London's neighbours and communities  
Policy 7.2 An inclusive environment  
Policy 7.3 Designing out crime  
Policy 7.4 Local character  
Policy 7.5 Public realm  
Policy 7.6 Architecture  
Policy 7.14 Improving air quality  
Policy 7.15 Reducing noise and enhancing soundscapes  
Policy 7.16 Green Belt  
Policy 7.19 Biodiversity and access to nature  
Policy 7.21 Trees and Woodland  
Policy 7.30 London's canals and other rivers and waterspaces  
Policy 8.2 Planning obligations  
Policy 8.3 Community Infrastructure Levy

5.3.2 Local Plan – Core Strategy (November 2010)

SO1 Enabling and focusing change  
SO2 Environmental sustainability  
SO3 Community cohesion  
SO4 New homes  
SO5 Education, health and wellbeing  
SO6 Maximising economic potential  
SO7 Employment and skills  
SO8 Transportation and accessibility  
SO9 Natural environment  
SO10 Built environment  
CP1 Strategic growth areas  
CP2 Housing supply and locations for new homes  
CP9 Supporting community cohesion  
CP13 Promoting economic prosperity  
CP14 Safeguarding strategic industrial locations  
CP20 Sustainable energy use and energy infrastructure  
CP21 Delivering sustainable water supply, drainage and sewerage infrastructure  
CP22 Delivering sustainable waste management  
CP24 The road network  
CP25 Pedestrians and cyclists  
CP30 Maintaining and improving the quality of the built and open environment  
CP31 Built and landscape heritage  
CP32 Pollution  
CP33 Green belt and countryside  
CP34 Parks, playing fields and other open spaces  
CP37 Central Leaside  
CP38 Meridian Water  
CP46 Infrastructure Contribution

5.3.3 Submission Version Development Management Document

DMD19 Strategic industrial locations  
DMD23 New employment development  
DMD37 Achieving high quality and design led development  
DMD38 Design process  
DMD39 The design of business premises  
DMD44 Preserving and enhancing heritage assets  
DMD45 Parking standards and layout

DMD47 New roads, access and servicing  
DMD48 Transport assessments  
DMD49 Sustainable design and construction  
DMD60 Assessing flood risk  
DMD61 Managing surface water  
DMD63 Protection and improvement of watercourses and flood defences  
DMD64 Pollution control and assessment  
DMD66 Land contamination and instability  
DMD68 Noise  
DMD75 Waterways  
DMD76 Wildlife corridors  
DMD82 Protecting the Green Belt  
DMD83 Development adjacent to the Green Belt

#### 5.3.4 Saved Unitary Development Plan (UDP) Policies

(II)GD3 Aesthetics and functional design  
(II)GD6 Traffic  
(II)GD8 Site access and servicing  
(II)H8 Privacy  
(II)H9 Amenity space  
(II)T16 Adequate access for pedestrians and people with disabilities  
(II)T19 Needs and safety of cyclist

#### 5.3.5 Other Relevant Policy

National Planning Policy Framework  
National Planning Policy Guidance

#### 5.3.6 Other Material Considerations

Upper Lee Valley Opportunity Area Planning Framework (July 2013)  
Central Leaside Area Action Plan (Proposed Submission - September 2014)  
Meridian Water Master Plan (July 2013)  
Section 106 Supplementary Planning Document (November 2011)

## 6. **Analysis**

6.1 This report sets out a broad analysis of the issues that arise from each of the proposals in light of adopted strategic and local planning policies including their implications to achieving the long term regeneration ambitions for Central Leaside and Meridian Water. Following the analysis, separate recommendations are made for Members to consider in making their decision. The key issues are considered as follows:

- Compatibility of proposals with the design principles set out in the Meridian Water Masterplan;
- Employment and uses of Strategic Industrial Land (SIL);
- Delivery of strategic and borough-wide housing targets;
- Transport and access;
- Flood risk and land contamination;
- Ecology and biodiversity;
- Environmental sustainability;



- Archaeology;
- Noise and air quality;
- Design considerations; and
- Planning obligations and Community Infrastructure Levy.

6.2 Before an analysis of the proposals is undertaken, a summary of the current and emerging policy context is considered necessary.

### 6.3 Policy Background

6.3.1 The National Planning Policy Framework provides a key foundation upon which the Council's plan-making and decision-taking is underpinned. It advocates that development should maximise opportunities in a sustainable way.

6.3.2 The proposed development lies within the boundary of the Central Leaside Area Action Plan and Meridian Water regeneration area, both of which occupy a strategic location within the Governments London- Stansted-Cambridge corridor. Meridian Water is long established as a significant area of regeneration, through Enfield's Core Strategy (2010), The London Plan (2011) and the Upper Lee Valley Opportunity Area Planning Framework (2013). It is the Council's largest regeneration priority area, identified in the Core Strategy as a location where a comprehensive approach to development will take place.

6.3.3 The Upper Lee Valley Opportunity Area Planning Framework sets out the Mayor's strategic agenda for the regeneration and growth of existing urban settlements within this important corridor, and identifies Meridian Water as a key contributor to delivering transformational development within this strategic corridor. Broadly, it emphasises the need for a comprehensive approach to its development to ensure the maximum potential for the delivery of 5000 new homes and 3000 new jobs can be realised. This would also be consistent with objectives of the NPPF and Policy 3.4 of the London Plan. Another key feature is the need to maximise the potential of waterside locations for mixed development to create vibrant and viable active frontages consistent with the objectives of the master Plan and the adopted OAPF. A key component in the realisation of these objective is The Causeway, which will open up the site improving access and linkage across the east /west axis of the site.

6.3.4 This agenda is further amplified at a local level through the Central Leaside AAP and Meridian Water Masterplan. It is underpinned further by site specific planning policies contained in the adopted Local Plan (Core Strategy Policies 37 and 38). At the time of writing the Central Leaside Area Action Plan was at a "submission stage" in advance of its consideration by Council. The Meridian Water Masterplan was adopted as Planning and Urban Design Guidance in July 2013, bringing together a sound evidence base and extensive consultations with key stakeholders, interested parties, and the public. Both these policy documents are sufficiently advanced to be considered as material considerations in the determination of planning applications in this area.

6.3.5 Central Leaside is predominantly an employment area, where the policy emphasis is on retaining and intensifying the existing uses within B1,B2 & B8 to support new and emerging business sectors. The creation of a new urban mixed use community at Meridian Water is also set out in policy applicable to this site.

6.3.6 The objectives of new development at Meridian Water (set out in Policy 38 of the Core Strategy) would be to create up to 5,000 new homes, 1500 new jobs (subsequently revised upward to 3000 as set out in the adopted Upper Lee Valley OAPF and all the necessary infrastructure to support the community and attract families and business to the area including: new schools; a mix of residential, retail and community uses; high quality public realm; reducing flood risk; sustainable housing embracing new technologies; high density development closer to Angel Road and waterfronts; new development to maximise the opportunities offered by waterfront locations; a new spine running through the area, connecting all parts of Meridian Water, linking new and existing communities; Improved connectivity both north-south and east-west; Integration with immediate employment areas, in particular Harbet Road Estate; Mix of housing types and tenures; New open space; Restoration of waterways which run through the development.

6.3.7 To maximise the opportunities arising out of redevelopment envisaged for Meridian Water to ensure the delivery of the regeneration aims of the Masterplan are met, a range of strategic infrastructure will be required. These are as follows:

- The Causeway: A route that would reconnect the east and west of Meridian Water. The route would comprise both Angel Square and the landmark Angel Bridge: key features in creating a viable and sustainable community.
- Canal-side West: Located to the west side of the Lee Navigation. The central theme here would be to accommodate high density waterfront apartments of high quality, a water side promenade with open spaces and a high quality environment. Enhancement could include leisure and social facilities.
- Meridian East: Located to the east side of the Lee Navigation. The existing industrial character and organisational structure of this area would be retained with new development brought forward on a managed and phased basis, gradually allowing for the intensification of uses across the area. It will be expected that the area will evolve slowly into an area where new businesses work alongside residential development set within a waterside and parkland environment to deliver new homes and a better quality urban environment.

- 6.4 Compatibility with adopted policy and the design principles set out in the Meridian Water Masterplan
- 6.4.1 The successful regeneration of the Meridian Water area will require both good access and movement through the site and connections into the surrounding areas particularly the upgraded Angel Road station. Regeneration at Meridian Water must not only create a sustainable community for the benefit of new residents, but also support the existing communities of Edmonton to the west, where there are significant levels of worklessness and other indicators of considerable deprivation.
- 6.4.2 The Causeway route through Meridian Water is therefore a fundamental component that will underpin the delivery of the regeneration aims for the area. The requirement for the Causeway is provided in Core Strategy Policy 38 and supported by the strategic direction provided in the Mayor's Upper Lee Valley Opportunity Area Planning Framework. The route has been established in the Meridian Water Masterplan (2013) and the Proposed Submission Central Leaside Area Action Plan (2014), where Policy CL1 shows the safeguarded route and land requirements. The intended delivery of the Causeway is considered to be short term as design work on both Phases 1 and 2 (see plan attached to Appendix C) is currently scheduled to commence before the end of this year with construction on Phase 1 following thereafter in early 2015 and Phase 2 in late 2015. This will effectively confirm the landing point for Angel Bridge over the River Lee Navigation and thus the landing point on the eastern side.
- 6.4.3 The Causeway will run east west as a spine road through Meridian Water and beyond to connect together the neighbourhoods, in particular linking new housing and businesses to the vital, upgraded station at Meridian Angel, and through to the Lee Valley Regional Park in the east and existing communities to the west. Enfield's Core Strategy establishes the importance of this critical connecting route and the reasons why it is necessary, in particular Core Policies 9, 25, 37 and 38.
- 6.4.4 The proposed development based on the redline application site for the outline planning application and the redline site for the detailed applications ignores requirements established in the planning documents and overlays the route of the Causeway. The central point of concern is related to the amount of development proposed, which would prevent the Causeway route from running through the eastern part of Meridian Water on the proposed alignment as well as disrupting the alignment of the bridging point across the Lee Navigation. Importantly, this would have direct implications with regard to access and movement improvements, both key principles underpinning the regeneration for the area.
- 6.4.5 The proposal occupies an area which comprises the link between the Meridian Water Masterplan neighbourhoods Canal-side West and Meridian East, which are in private ownership. The proposals would significantly impact on the completion of the Causeway link from Angel Square to Harbet Road. To the south of Silvermere Drive the proposals would cut through the Angel Square and eastern portion of the Causeway route, preventing the delivery of the Causeway component of Masterplan, compromising the regeneration aims.

- 6.4.6 It should be noted that the Council has invested significant time in planning the Causeway alignment including associated infrastructure (Angel Square and Angel Bridge) so that they are in an optimal location and deliverable within realistic timescales to enable regeneration of the area. Furthermore, work on the safeguarded route (prepared by consultants CH2M HILL) has minimised land assembly and delivery issues, for example The Angle Bridge landing on the eastern bank of the Lee Navigation and the alignment of the Causeway link to Harbet Road Industrial Estate (to become the Meridian East neighbourhood) utilises land in public ownership. Since the route is based upon the most optimum solution, the proposed developments clearly would affect the deliverability of the Causeway, Angel Square and Angel Bridge in a significant and negative way. Officers have acknowledged the projected lifespan of the development at between 20-25 years, although it is evident that these timescales would cause conflict with the programme for delivery of the first phase of the Causeway (as indicated in para. 6.4.2 of the report) and indeed its future alignment.
- 6.4.7 The requirements of the Proposed Submission Central Leaside Area Action Plan Policy CL1 are for a Causeway route which is navigable and safe along its entire length for cyclists and pedestrians. The proposed type development will consist in a large part B8 category uses (Storage and distribution/logistics). These types of uses typically require large buildings of a design that do not readily lend themselves to creating safe and inclusive environments. The amount of development being proposed, the likely layout and kind of operational requirements demanded of the uses would collectively limit the physical capacity to accommodate the integration of pedestrian and cycle ways that are crucial to achieving a sustainable and well-planned development as advocated under National Planning Policy.
- 6.4.8 Therefore, in terms of its impact on the Causeway, the proposal is not compatible with the Council's delivery of regeneration priorities and the strategic direction provided in the Mayor's Upper Lee Valley Opportunity Area Planning Framework for Meridian Water.
- 6.4.9 The towpath area to the east of the Lee Valley Navigation is another key asset in the Meridian Water regeneration. The Masterplan and Proposed Submission Central Leaside Area Action Plan Policies CL9 and CL26, envisage significant improvements along Towpath Road to provide an attractive waterside environment and cycle and pedestrian-friendly transport route.
- 6.4.10 It should be noted that the outline proposal includes plans showing improvements to the towpath area which are illustrative only (Drawing no.s 30371-PL-120B and 30371-PL-121B), and therefore cannot be relied upon to understand the final layout of the site.
- 6.4.11 Instead, the key plan in the proposal is the Development Parameters Plan (drawing number 30371-PL-104D) shows a road running along the waterside made available for heavy goods vehicle (HGV) parking/turning and car-parking which leaves no specific improvement for landscaping or provision for cyclists and pedestrians. Whilst the map shows indicative arrows for cyclists and pedestrians, these users have no priority areas or segregated road space. Furthermore, this approach to the design of this important canal side frontage would not provide the quality of environment which will be necessary to support active frontage or mixed use development as set out in the Masterplan.

6.4.12 Through its failure to maximise the opportunities offered by the waterfront location the proposal does not accord with the Masterplan and would fail to meet the policy requirements of Core Policies 30, 37 and 38, and Proposed Submission CLAAP Policy CL8. The proposal also lacks sufficient provision for cyclists and pedestrians, as required by Core Policies 25 and Proposed Submission CLAAP Policies CL8 and CL26.

6.4.13 Employment and uses of Strategic Industrial Land (SIL)

6.5.14 The Stonehill Estate lies within designated Strategic Industrial Land (SIL), and forms the north part of the Harbet Road Industrial Estate. Policies relevant to industrial land and employment are contained within the Core Strategy (2010), the Proposed Submission DMD (2013), The Upper Lee Valley OAPF (2013), the London Plan, Meridian Water Masterplan (2013) and Proposed Submission Central Leaside Area Action Plan (2014).

6.5.15 SIL designated areas are protected through Core Policy 14 and DMD 19, and the proposed land uses for Stonehill of B1c, B2 and B8 do not contravene these policy requirements.

6.5.17 The requirements of the Meridian Water Masterplan and Proposed Submission CLAAP are for 3,000 new jobs as a critical part of the Meridian Water regeneration. These jobs are not only for the new residents of Meridian Water, but also for the existing communities of Edmonton, which lie to the west and experience high levels of worklessness and social deprivation. A key objective of the Meridian Water regeneration is to address these social and economic issues.

6.5.17 Core Policy 37 states that the industrial estates of Central Leaside will be retained and intensified to increase job density within Meridian Water and the wider Central Leaside area, particularly within the areas of designated Strategic Industrial Land (SIL) and Locally Significant Industrial Sites (LSIS). Re-designation of employment land is considered as a key policy objective that would assist the Council in achieving greater intensification of employment uses and jobs in order to act as a catalyst for the regeneration of Meridian Water.

6.5.18 In the overall context of the Meridian Water development, the Stonehill Estate is considered to be better suited to higher-density, higher value-added business uses. The Proposed Submission Central Leaside Area Action Plan provides evidence on how developments on employment land in inner-London boroughs are driving demand towards locations such as Enfield. Innovative, creative industries that provide job-dense employment are increasingly searching for good London-based locations of the type that Meridian Water will be able to provide. To respond to this trend, the Proposed Submission CLAAP Policy CL10 designates 5.4ha of the Stonehill Estate to become an Industrial Business Park (IBP) which would comprise B1a, B1b and B1c uses. The Council considers these employment uses will be better suited to the greatly improved environment at Meridian Water, and will not conflict with the neighbouring residential uses established in the Masterplan and CLAAP. This approach is supported by Core Strategy Policy 13 which specifically refers to transformational change in Central Leaside to attract growth industries that are currently under-represented in Enfield such as business services, creative industries and hospitality.

- 6.5.19 A careful reading of the proposal reveals that the jobs figure quoted is based upon the most optimistic, best case scenario assessment in terms of job density and use type, and that calculations using other, equally valid assumptions, would lead to considerably lower estimates. For example, the applicant's total assumes 36% of the floorspace to be B1c, despite not stating the proportion of such a use in the application, and therefore this figure is speculative. Furthermore, the 'increase' in job numbers is based upon what the applicant describes as 'current estimates' – these estimates are lower than those made by the Council using ONS job figures from the area and may therefore further inflate the real likely increase.
- 6.5.20 Officers have acknowledged the qualitative improvements that could be achieved under the proposals, although the benefits are considered to be short sighted and restrictive in achieving the wider socio-economic improvements that strategic and local planning policies are seeking for the area.
- 6.5.21 Overall, the proposed developments would act against the realisation of the regeneration aims for Meridian Water and the wider area since it would not likely achieve the types of uses and job densities required to support long term regeneration and it is therefore inconsistent with the aims and objectives of the ULV OAPF, London Plan, Core Strategy Policies 13 and 37, the Masterplan and Proposed Submission CLAAP Policies 8, 10 and 20.
- 6.5.22 Delivery of strategic and Borough-wide housing targets
- 6.5.23 Due to rapid population growth, new housing delivery is of great importance in the context of both Enfield and London-wide. The "Further Alterations" to the London Plan (FALP) establishes the increased need for housing delivery within London, with a target of 42,000 homes per year London-wide. Enfield's target will be increased to 798 homes per annum from the existing target of 560.
- 6.5.24 A vital aspect of the Meridian Water regeneration is that it will bring forward a significant and vital quantum of new housing, with up to 5,000 new homes planned for the area, as established in the Core Strategy, in particular policies 37 and 38, and the Mayor's Upper Lee Valley Opportunity Area Planning Framework.
- 6.5.25 Successful provision of housing is also an essential element to the regeneration of the entire area, necessary to provide the much-needed homes, along with the population to support new services and jobs.
- 6.5.26 The Meridian Water Masterplan and Proposed Submission CLAAP show that to achieve the new housing requirements, the southern part of the Harbet Road industrial estate will become residential use. However, the uses in the remaining SIL areas to the north of the residential area, which includes the Stonehill site, must be compatible with such housing provision. The neighbourhood must therefore be planned as part of an integrated, holistic approach which allows the successful coexistence in close proximity of residents and industrial and commercial uses. The Meridian Water Masterplan and Proposed Submission CLAAP provide the urban design framework and policies which underpin these aims.
- 6.5.27 As indicated in the previous section, it is essential that suitable commercial and industrial uses are developed at an increased density in the remaining

part of the industrial estate to the north of the area and in a way which will not be detrimental to the delivery of new homes in the adjoining area.

- 6.5.28 Whilst policy DMD 19 permits the proposed use classes within the SIL designation, the supporting text clarifies that uses requiring heavy goods access by road and the need to operate outside normal business hours require sufficient distance from noise sensitive uses, which in this case will be the residential areas of the Meridian East and Canal Side-west neighbourhoods. The Proposed Submission CLAAP Policy CL8 establishes the type of employment uses appropriate to a commercial/ residential interface, and which can provide a mutually-beneficial development. The broad regeneration requirements established in Core Strategy policies 1, 37 and 38, the Mayor's Upper Lee Valley Opportunity Area Planning Framework, Meridian Water Masterplan and Proposed Submission CLAAP, all support the priority for social and physical infrastructure, which includes housing, and any proposals within the key regeneration sites and CLAAP areas must take account of this.
- 6.5.29 Furthermore, the proposals would overlap the area established for residential uses by the Proposed Submission CLAAP (supported by Policies CL8 and CL10) and as such may directly impact on the quantum of housing that is deliverable in this neighbourhood. It is considered that any potential reduction in the land available for housing in Meridian Water would not be readily offset by other sites in the Borough which in turn significantly compromises the ability of the Council to achieve its local housing target as well as contribute to London's housing needs, and more importantly to deliver and sustain its regeneration plans for the area.
- 6.5.30 To support the Council's aims to establish Meridian Water as a key living destination in the London-wide and Borough context, it has recently applied for Housing Zone funding from the Greater London Authority (GLA). The Council remain optimistic that a funding award will be supported by the GLA.
- 6.5.31 Transport and Access
- 6.5.32 The Council's Highway Officer and Transport for London (TfL) have not objected to the proposals with particular regard to the current impact on the means of access and traffic generation subject to relevant planning conditions and planning obligations to secure highway improvements. However, it should also be noted that both cite their concerns relating to the impact of the proposals on the implementation of the Causeway and seek assurances that design of any future infrastructure can accommodate a range of sustainable transport modes.
- 6.5.33 TfL specifically indicates that it is seeking an improvement to bus access within the area and provision of a bridging point across the canal to prevent double running of buses across the Masterplan area. In addition, they also raise the importance of establishing good pedestrian and cycle ways on the immediate sides of the canal including developing the potential to use the canal for freight purposes.
- 6.5.34 The Council Highways officer has similar concerns in that the deliverability of the Causeway is essential to securing better public transport connectivity between the east and west of Meridian Water.

- 6.5.35 Officers have noted the comments of the applicant's transport consultant which state that the proposals would not prejudice the delivery of a new connecting route and that alternative solutions may exist as well as there being uncertainties about the form and nature of the Causeway. With regard to the first point, the Council would refer the applicant to the advanced stage of the phasing plan and its implementation as early as 2015 as a key indication that the route is established. In respect of the second point, it is considered that the form and nature of the Causeway has been sufficiently documented in the Masterplan as well as the CLAAP.
- 6.5.36 In summary, whilst it is acknowledged that the proposals would be acceptable in access and traffic generation terms, these considerations are considerably outweighed against the longer term aims which seek to establish a holistic and sustainable transport network that in turn provides a platform to support regeneration of Meridian Water in accordance with the strategic directions in the ULV OAPF and CLAAP.
- 6.5.37 Flood risk and land contamination
- 6.5.38 The Environment Agency has objected to the outline planning proposals on grounds that the applicant's flood risk assessment has not demonstrated how surface water will be managed in a sustainable way through a Sustainable Urban Drainage Strategy (SuDS) contrary to Policy 5.13 of the London Plan and Core Policy 28. No objections have been raised in relation to a loss of floodplain storage as this detail would be addressed at a Reserved Matters stage.
- 6.5.39 With regard to the full detailed applications, the EA has requested further information that would demonstrate that the development would not increase flood risk elsewhere given the alterations to ground levels in each respect.
- 6.5.40 Officers are aware that the applicants are in discussion with the EA to resolve the above mentioned issues. Should these issues not be resolved before the Committee meeting a further reason for refusal shall be included to the officer's recommendation. Committee will be updated at the meeting.
- 6.5.41 In terms of site contamination, the applicant's report states that further investigations will be carried out once clearance has been completed. The Environmental Health Officer is satisfied with this although recommends a planning condition to secure relevant details in advance of any development commencing.
- 6.5.42 Ecology and biodiversity
- 6.5.43 A Phase One survey has been submitted indicating that there is potential that the existing buildings and vegetation will harbour nesting birds and in particular Black Redstart(s), as well as roosting bats. However, the Council's ecologist is satisfied that planning conditions could adequately control any adverse effects on any local bird and bat species that may be found.
- 6.5.44 Further recommendations relating to enhanced landscaping and incorporation green roofs are considered justified and reasonable and could be secured by planning condition.



6.5.45 Environmental sustainability

6.5.46 The proposed developments seek to achieve a “very good” rating under the under the BREEAM standards. This would be contrary to Strategic Objective 2 of the Core Strategy which advocates the provision of exemplary flagship sustainable development to the Meridian Water Masterplan and Central Leeside Area Action Plans. This point is reinforced at Point 8 of the ‘Guiding Principles’ sections which states that:

***‘Meridian Water sets out an ambition to deliver the highest standards of sustainability, climate change mitigation and adaptability.’***

The NPPF makes it an explicit presumption that all new development should be sustainable.

6.5.47 In terms of achieving energy efficiency in building design all major developments are required demonstrate a 40% improvement over Building Regulations over a 2010 compliant baseline (or 35% over a 2013 baseline). The amended energy strategy for all the applications reflects the 2013 baseline recommendations including a commitment to achieve 2013 compliance through efficiency measures. This matter can be appropriately secured by planning condition.

6.5.48 In addition, and in accordance with DMD52 the CLAAP and Masterplan, the site is directly adjacent to the Upper Lee Valley Decentralised Energy Network (ULV DEN). The facilitation and delivery of the ULV DEN is a Strategic Priority for the Borough. Whilst it is acknowledged a low heat demand would be generated by the development, to ensure associated infrastructure is fit-for-purpose and responsive to future end-user demands, the provision of a connection to the ULV DEN is a Policy and Strategic requirement and would need to be secured as part of any s106. While any agreement would stop short of compelling connection, the importance of securing relevant connection points (and associated infrastructure) cannot be discounted at this stage.

6.5.49 The proposals indicate the intention to adopt photovoltaic technology to achieve energy saving targets. However, it is unclear from the level of detail provided how this would relate to ULV DEN.

6.5.50 The submitted sustainability strategy fails to engage with the requirements for living roof / walls completely despite this issue being raised during the pre-application stage. The broad statements made to justify the omission of living roofs such a structural load issues is inadequate, particularly as a detailed design stage/specification has not been reached. The Council’s Sustainable Design Officer remains committed to discussing the outstanding issues raised in order to achieve a reasonable and balanced position.

6.5.51 There are no objections with regard to recycling targets for waste generated from the demolition of buildings and the water efficiency design of buildings. Both these matters could be addressed through planning conditions.

6.5.52 Archaeology

6.5.53 The applicants have prepared desk based assessments for each application although these fall short of being conclusive to enable a robust analysis to be undertaken by English Heritage. The applicant is currently liaising with English Heritage and an update on this matter will be provided for Committee at the meeting.

6.5.54 Noise and air quality

6.5.55 Noise generated from demolition and construction could be mitigated by a planning condition in the form of a construction management plan.

6.5.56 However officers remain concerned that the redevelopment proposals do not attempt to consider the future interface between industrial and the high density residential uses that are planned on both the east and west sides of the canal (Canal Side West and Meridian East neighbourhoods). A lack of design foresight at this stage would potentially harm the quality of the residential environment provided which in turn may affect the viability of regeneration.

6.5.57 Therefore, the proposals in the respect of noise would be contrary to Policy CL8 of the Proposed Submission CLAAP which establishes the type of employment uses that would be considered to provide a compatible residential/industrial interface and consequentially Policy 32 of the Core Strategy.

6.5.58 No objections have been raised in terms of the impact of the developments on air quality as this matter could reasonably be dealt with through planning conditions and/or obligations.

6.5.59 Design considerations

6.5.60 It is recognised that design is not for consideration as part of the assessment of the outline application although does fall to be considered with regard to the two detailed applications. From analysis of the proposals against the Masterplan design objectives, it becomes clear that there would be significant conflict between the aims and objectives as conceived. The conflict is principally caused by the quantum of development for all three applications relative to site boundaries and the impact this would have on the alignment of the Causeway, the setting of the developments (with reference to the potential for future landscaping need to create the enhanced public realm) and its capacity to accommodate the relevant pedestrian and cycle infrastructure including wider environmental enhancements.

6.5.61 In particular, it is noted that the outline application seek to establish acceptance of a maximum floor area for a single unit up to **29,750 sq.m**. This represents a sizeable building likely to incorporate extensive blank elevations (due to the likely operational needs of end users) which would not meet the objectives identified by the Council and the GLA of providing active frontages or the setting to provide a high quality environment that is conducive to supporting mixed use development especially as this route would form a key desire line for occupiers of residential development to the south seeking to access the bridge and riverside frontage.

6.5.62 These matters pose significant implications to the realisation of the regeneration aims as set out and would need to be urgently addressed by the applicants.

6.5.63 Planning obligations and Community Infrastructure Levy (CIL)

6.5.64 Planning obligations relating to highway improvements, the provision of pedestrian and cycle infrastructure, public realm improvements, and a construction employment strategy would be necessary and justifiable to make each of the applications acceptable in planning terms. Officers note that the each of the application submissions do not clarify their intentions in this respect although would welcome discussions to illicit the range and type of obligations required once fundamental policy objections have been satisfactorily resolved.

6.5.65 All three development proposals would collectively result in a net reduction in built footprint and therefore liability against the Mayor's CIL would not be triggered.

6.6 Response to the comments of the GLA

6.6.1 Officers have acknowledged the GLA's support for the outline planning proposals and provide the following review in light of the above issues.

6.6.2 Principle of development: Officers note that the proposed developments would be compatible in land use terms and acknowledge the broad benefits secured from improving the physical assets on the estate. However, officers reiterate that their recommendations are a narrow and misdirected interpretation of the clear aims and objectives set out in policy guidance with the main points being:

- a. The quantum of development proposed would significantly interfere with the alignment of the Causeway and the location of the bridge (Angel Bridge). As acknowledged by the GLA, this is a key enabling component that underpins the regeneration aims for Meridian Water. The importance of the proposed alignment cannot be dismissed as it represents the optimum route in landownership and deliverability terms. In the absence of an alternative and more viable route, the proposals would frustrate delivery of this key infrastructure and consequently delay the regeneration of Meridian Water;
- b. The quantum of development proposed would significantly compromise the ability to secure the active frontages and environmental enhancements in the public realm that is sought by the proposed submission CLAAP as well as Meridian Water Masterplan. The amount of development being proposed would result in large commercial buildings dominating the interface of the Causeway and in particular the canal side, reducing the opportunities to maximise provision of the open spaces required in any well planned and sustainable development;
- c. The quantum of development and the type of uses proposed would compromise the ability to deliver a successful interface with future residential uses at Meridian East and Canal-side West. As will have been noted, it is envisaged that Meridian Water will accommodate a substantial proportion of future housing growth in the Borough (up to 5000 new homes), an essential component in supporting the long term regeneration of the area and as recognised in the application for Housing Zone status. In essence, this would

undermine the Council's ability to secure the strategic housing allocation for Meridian Water.

- 6.6.3 **Employment:** Officers acknowledge that any redevelopment would potentially provide additional jobs compared to that existing although the projected increase is considerably below the target figures envisaged for Central Leaside as stated in the ULV OAPF and CLAAP. Moreover, it is acknowledged that as new units, there would be a qualitative improvement in the standard of accommodation on offer. However, the projected employment figures presented are optimistic and at best a speculative scenario which is inconsistent with current statistical evidence underpinning the Council's assumptions for future job growth in the area. Whilst the benefit of the proposal in job terms has not entirely been dismissed by officers, the nature of the uses and the indicative size of units being proposed would fail to maximise job creation in accordance with the policy aims, and therefore compromise the long term regeneration of the area.
- 6.6.4 **Transport and access:** The proposed quantum of development would undermine/compromise the ability to secure a sustainable, safe and interconnected transport network. A core principle of the regeneration aims is to reconnect Meridian East with the rest of Borough. The proposals not only frustrate the alignment of the Causeway but it would harm the ability of the resulting infrastructure to satisfactorily accommodate pedestrian and cycle ways which are considered pivotal to achieving an integrated and sustainable transport network.

## **7. Conclusion**

- 7.1.1 The applications submitted are considered to be incompatible with the strategic and local aims and objectives for the regeneration of Central Leaside and Meridian Water.
- 7.1.2 The main issues that arise from the assessment of the proposals are summarised as follows:
- Frustrate delivery of the Causeway, a central component underpinning the ability to deliver the regeneration aims for Meridian Water;
  - Given the nature and type of the uses proposed, the quantum of jobs that would be created are speculative only. They largely avoid the long term aims to create job growth and opportunities (as envisaged in the ULV OAPF) that would support the future communities at Meridian Water as well as tackle the acute unemployment in neighbouring Edmonton;
  - The amount and type of the uses comprised in the proposals would compromise the ability to plan an acceptable interface between future residential uses at Meridian East and Canal Side West. Accordingly, this may compromise the ability to achieve adopted strategic and local housing targets;
  - Given the amount and type of development, commercial units would dominate the key access routes into the site, harming the quality of the public realm and wider environment;
  - The amount of development proposed and its location would compromise the ability to deliver key infrastructure to support an

integrated and sustainable transport network at Meridian Water and its connection with the area and beyond;

- The proposals have failed to provide satisfactory drainage strategy for the future uses in accordance with; and
- Inadequate justification has been made with regard to the ability to connect to the Lee Valley Heat Network. Providing a connection to the LVHN is integral to supporting a low carbon community at Meridian Water and Central Leaside.

7.1.2 Accordingly, it is recommended that the proposed applications be refused.

## 8. Recommendation

8.1 It is recommended that each proposal should be refused for the following reasons:

8.2 Application No.1 Planning Reference 14/02806/OUT)

### **Redevelopment of site to provide up to 46,451 sqm of industrial floorspace (B1c), (B2) and or (B8) (OUTLINE with some matters reserved - ACCESS).**

1. The proposed redevelopment by reason of its total floorspace would frustrate the delivery of “The Causeway” and Angel Bridge, both considered to be critical infrastructure that achieves the reconnection of the east of Meridian Water (including the Lee Valley) with the west of the Borough as well as underpinning the future successful regeneration of Meridian Water and Central Leaside. As such the proposals would be contrary to the strategic directions provided in the Upper Lee Valley Opportunity Area Planning Framework, Policies 2.8 and 2.13 of the London Plan, Policy CL1 of the proposed submission Central Leaside Area Action Plan, Policies 9, 25, 37 and 38 of the Adopted Core Strategy including the aims and objectives set out in Section 4 of the Meridian Water Masterplan (2013).
2. The proposed redevelopment would constrain the amount of land that would be available for residential redevelopment at Meridian East, impacting on the ability of the Council to accommodate the housing required to meet its local target of 5000 new homes in this area. As such the proposals would be contrary to the strategic directions provided in the Upper Lee Valley Opportunity Area Planning Framework, Policies 2.13, 2.16, 3.3, 3.4 and 4.4 of the London Plan, Policy CL8 and CL10 of the proposed submission Central Leaside Area Action Plan, Policies 1, 2, 37 and 38 of the Adopted Core Strategy including the aims and objectives set out in Sections 5.6 and 5.7 of the Meridian Water Masterplan (2013).
3. The proposed amount and type of uses would fail to maximise employment opportunities in the area. Whilst the proposals indicate that additional jobs would be created, these are speculative and do not reflect the established assumptions for future job creation at Central Leaside and Meridian Water. As such the proposals would be inconsistent with the strategic directions provided in the Upper Lee Valley Opportunity Area Planning Framework, Policies 2.7, 2.13 and 4.4 and London Plan which

seeks the intensification of employment uses, Policies CL8, CL10 and CL20 of the proposed submission Central Leaside Area Action Plan, Policies 13, 37 and 38 of the Adopted Core Strategy including the aims and objectives of the Meridian Water Masterplan (2013).

4. The proposal by reason of its amount, type and location together with the failure to facilitate the provision of the Causeway would constrain the developments ability to enable the proper integration with future land uses, provide active and vibrant building frontages, and as a result would prejudice the creation of a successful and sustainable place where different land uses can interact. The urban landscape would as a result become illegible, unattractive and unfriendly for future commercial and residential occupiers including visitors, which in turn is detrimental to the regeneration aims for Meridian Water. As such the proposals would be inconsistent with the strategic directions provided in the Upper Lee Valley Opportunity Area Planning Framework, Policies 2.13, 6.1, 7.1, 7.3, 7.4, 7.5 and 7.30 of the London Plan, Policy CL10 of the proposed submission Central Leaside Area Action Plan, Policies 30 and 38 of the Adopted Core Strategy including the aims and objectives of the Meridian Water Masterplan (2013).
5. The applicants have failed to satisfactorily justify the lack of provision of relevant infrastructure to enable future connection to the Lee Valley Heat Network. As a consequence the development would be inconsistent with both national and local objectives that support the transition to a low carbon economy. Accordingly the proposals are contrary to the strategic directions provided in the National Planning Policy Framework, Upper Lee Valley Opportunity Area Planning Framework, Policy 5.5 and 5.6 of the London Plan, Policy CL30 of the proposed submission Central Leaside Area Action Plan, Policies 20 and 38 of the Adopted Core Strategy, Policy DMD52 and including the aims and objectives set out in the Meridian Water Masterplan (2013).
6. The proposals by reason of the amount and its resulting impact on key enabling infrastructure would undermine the ability to provide a safe, sustainable and interconnected transport network. As such the proposals are contrary to strategic direction set out in the Upper Lee Valley Opportunity Area Planning Framework, Policies 2.8, 2.13 and 6.1 of the London Plan, Policies CL1 and CL26 of the proposed submission Central Leaside Area Action Plan, Policies 24, 25 and 38 of the Adopted Core Strategy including the aims and objectives set out in the Meridian Water Masterplan (2013).
7. The application proposals have failed to provide appropriate infrastructure contributions to enable the implementation of highway and public realm enhancements including a mechanism to secure employment and training initiatives which are considered necessary to make the application acceptable in planning terms. As such the proposals are contrary to Policy 8.2 of the London Plan, Policies CL10 and CL20 of the proposed submission Central Leaside Area Action Plan; Policy 46 of the Adopted Core Strategy; and advice contained with the Adopted S.106 Supplementary Planning Document.

8.3 Application No.2 (Planning Reference 14/02807/FUL)

**Redevelopment to provide 2,298 sq m (GEA) of light industrial (B1c) and/or storage and distribution (B8) floorspace, including ancillary showroom and office floorspace with associated car parking and access arrangements.**

1. The proposed size and siting of the new building would compromise the alignment of "The Causeway" and Angel Bridge, critical infrastructure that would secure the reconnection of the east of Meridian Water (including Lee Valley) with the west of the Borough as well as underpinning the future successful regeneration of Meridian Water and Central Leaside. As such the proposals would be contrary to the strategic directions provided in the Upper Lee Valley Opportunity Area Planning Framework, Policies 2.8 and 2.13 of the London Plan, Policy CL1 of the proposed submission Central Leaside Area Action Plan, Policies 9, 25, 37 and 38 of the Adopted Core Strategy including the aims and objectives set out in Section 4 of the Meridian Water Masterplan (2013).
2. The proposed size, siting and use would constrain the amount of land that would be available for residential redevelopment at Meridian East, impacting on the ability of the Council to accommodate the housing required to meet its local target of 5000 new homes in this area. As such the proposals would be contrary to the strategic directions provided in the Upper Lee Valley Opportunity Area Planning Framework, Policies 2.13, 2.16, 3.3, 3.4 and 4.4 of the London Plan, Policy CL8 and CL10 of the proposed submission Central Leaside Area Action Plan, Policies 1, 2, 37 and 38 of the Adopted Core Strategy including the aims and objectives set out in Sections 5.6 and 5.7 of the Meridian Water Masterplan (2013).
3. The proposed development would not sufficiently maximise the employment potential of the site which in turn compromises the aims and objectives to achieve job growth as set out in strategic and local guidance. As such the proposals would be inconsistent with the strategic directions provided in the Upper Lee Valley Opportunity Area Planning Framework, Policies 2.7, 2.13 and 4.4 and London Plan which seeks the intensification of employment uses, Policies CL8, CL10 and CL20 of the proposed submission Central Leaside Area Action Plan, Policies 13, 37 and 38 of the Adopted Core Strategy including the aims and objectives of the Meridian Water Masterplan (2013).
4. The proposal by reason of its size, siting and design would not provide the integrated, active or vibrant building frontages advocated in strategic and local guidance, prejudicing the creation of a successful and sustainable place. As such the proposals would be inconsistent with the strategic directions provided in the Upper Lee Valley Opportunity Area Planning Framework, Policies 2.13, 6.1, 7.1, 7.3, 7.4, 7.5 and 7.30 of the London Plan, Policy CL10 of the proposed submission Central Leaside Area Action Plan, Policies 30 and 38 of the Adopted Core Strategy including the aims and objectives of the Meridian Water Masterplan (2013).
5. The applicants have failed to satisfactorily justify the lack of provision of relevant infrastructure to enable future connection to the Lee Valley Heat Network. As a consequence the proposed development would be inconsistent

with both national and local objectives that support the transition to a low carbon economy. Accordingly the proposals are contrary to the strategic directions provided in the National Planning Policy Framework, Upper Lee Valley Opportunity Area Planning Framework, Policy 5.5 and 5.6 of the London Plan, Policy CL30 of the proposed submission Central Leaside Area Action Plan, Policies 20 and 38 of the Adopted Core Strategy, Policy DMD52 and including the aims and objectives set out in the Meridian Water Masterplan (2013).

6. The proposed building by reason of its size and location would impact on the provision of key enabling infrastructure particularly the Causeway, undermining the ability to provide a safe, sustainable and interconnected transport network. As such the proposals are contrary to strategic direction set out in the Upper Lee Valley Opportunity Area Planning Framework, Policies 2.8, 2.13 and 6.1 of the London Plan, Policies CL1 and CL26 of the proposed submission Central Leaside Area Action Plan, Policies 24, 25 and 38 of the Adopted Core Strategy including the aims and objectives set out in the Meridian Water Masterplan (2013).
7. The application proposals have failed to provide appropriate infrastructure contributions to enable the implementation of highway and public realm enhancements including a mechanism to secure employment and training initiatives which are considered necessary to make the application acceptable in planning terms. As such the proposals are contrary to Policy 8.2 of the London Plan, Policies CL10 and CL20 of the proposed submission Central Leaside Area Action Plan; Policy 46 of the Adopted Core Strategy; and advice contained with the Adopted S.106 Supplementary Planning Document.

#### 8.4 Application No.3 (Planning reference 14/02808/FUL)

**Redevelopment to provide 2,201 sq m (GEA) of light industrial (B1c) and/or storage and distribution (B8) floorspace including ancillary showroom and office floorspace with associated car parking and access arrangements.**

1. The proposed size and siting of the new building would compromise the alignment of "The Causeway" and Angel Bridge, critical infrastructure that would secure the reconnection of the east of Meridian Water (including Lee Valley) with the west of the Borough as well as underpinning the future successful regeneration of Meridian Water and Central Leaside. As such the proposals would be contrary to the strategic directions provided in the Upper Lee Valley Opportunity Area Planning Framework, Policies 2.8 and 2.13 of the London Plan, Policy CL1 of the proposed submission Central Leaside Area Action Plan, Policies 9, 25, 37 and 38 of the Adopted Core Strategy including the aims and objectives set out in Section 4 of the Meridian Water Masterplan (2013).
2. The proposed size, siting and use would constrain the amount of land that would be available for residential redevelopment at Meridian East, impacting on the ability of the Council to accommodate the housing required to meet its local target of 5000 new homes in this area. As such the proposals would be contrary to the strategic directions provided in the Upper Lee Valley Opportunity Area Planning Framework, Policies 2.13, 2.16, 3.3, 3.4 and 4.4 of the London Plan, Policy CL8 and CL10 of the proposed submission Central



Leeside Area Action Plan, Policies 1, 2, 37 and 38 of the Adopted Core Strategy including the aims and objectives set out in Sections 5.6 and 5.7 of the Meridian Water Masterplan (2013).

3. The proposed development would not sufficiently maximise the employment potential of the site which in turn compromises the aims and objectives to achieve job growth as set out in strategic and local guidance. As such the proposals would be inconsistent with the strategic directions provided in the Upper Lee Valley Opportunity Area Planning Framework, Policies 2.7, 2.13 and 4.4 and London Plan which seeks the intensification of employment uses, Policies CL8, CL10 and CL20 of the proposed submission Central Leeside Area Action Plan, Policies 13, 37 and 38 of the Adopted Core Strategy including the aims and objectives of the Meridian Water Masterplan (2013).
4. The proposal by reason of its size, siting and design would not provide the integrated, active or vibrant building frontages advocated in strategic and local guidance, prejudicing the creation of a successful and sustainable place. As such the proposals would be inconsistent with the strategic directions provided in the Upper Lee Valley Opportunity Area Planning Framework, Policies 2.13, 6.1, 7.1, 7.3, 7.4, 7.5 and 7.30 of the London Plan, Policy CL10 of the proposed submission Central Leeside Area Action Plan, Policies 30 and 38 of the Adopted Core Strategy including the aims and objectives of the Meridian Water Masterplan (2013).
5. The applicants have failed to satisfactorily justify the lack of provision of relevant infrastructure to enable future connection to the Lee Valley Heat Network. As a consequence the proposed development would be inconsistent with both national and local objectives that support the transition to a low carbon economy. Accordingly the proposals are contrary to the strategic directions provided in the National Planning Policy Framework, Upper Lee Valley Opportunity Area Planning Framework, Policy 5.5 and 5.6 of the London Plan, Policy CL30 of the proposed submission Central Leeside Area Action Plan, Policies 20 and 38 of the Adopted Core Strategy, Policy DMD52 and including the aims and objectives set out in the Meridian Water Masterplan (2013).
6. The proposed building by reason of its size and location would impact on the provision of key enabling infrastructure particularly the Causeway, undermining the ability to provide a safe, sustainable and interconnected transport network. As such the proposals are contrary to strategic direction set out in the Upper Lee Valley Opportunity Area Planning Framework, Policies 2.8, 2.13 and 6.1 of the London Plan, Policies CL1 and CL26 of the proposed submission Central Leeside Area Action Plan, Policies 24, 25 and 38 of the Adopted Core Strategy including the aims and objectives set out in the Meridian Water Masterplan (2013).
7. The application proposals have failed to provide appropriate infrastructure contributions to enable the implementation of highway and public realm enhancements including a mechanism to secure employment and training initiatives which are considered necessary to make the application acceptable in planning terms. As such the proposals are contrary to Policy 8.2 of the London Plan, Policies CL10 and CL20 of the proposed submission Central Leeside Area Action Plan; Policy 46 of the Adopted Core Strategy; and advice contained with the Adopted S.106 Supplementary Planning Document.



**Stonehill Estate, Silvermere Drive, London, N18 3QH**

in the London Borough of Enfield

planning application no. 14/02806/OUT

**Strategic planning application stage 1 referral**

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008

**The proposal**

Outline application (all matters reserved except access) for the demolition of existing buildings on the site, and redevelopment to provide up to 46,451 sq.m of industrial floorspace (Use Classes B1(c), B2 and/or B8).

**The applicant**

The applicant is **LaSalle Investment Management** and the architect is **Michael Sparks Associates**.

**Strategic issues**

The **principle** of replacement industrial units on this site within a **Strategic Industrial Location** and within the **Upper Lee Valley Opportunity Area** is supported in strategic terms, and the qualitative improvements outweigh the reduction in floorspace. Whilst in outline form, there is no strategic concern with the indicative **design, height or massing**, and the **public realm** improvements proposed are welcomed.

More information is required on **transport** to ensure that the scheme adequately considers the transport objectives set out in the Meridian Water Masterplan, particularly in relation to **buses**. Some further information is also required on matters of **energy** and **flooding** to ensure full compliance with the London Plan.

**Recommendation**

That Enfield Council be advised that the application broadly complies with the London Plan but that the issues set out in paragraph 67 of this report should be addressed before the scheme is referred back to the Mayor.

**Context**

1 On 7 August 2014 the Mayor of London received documents from Enfield Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008 the Mayor has until 17 September 2014 to provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

2 The application is referable under Category 1B of the Schedule to the Order 2008:

*Development (other than development which only comprises the provision of houses, flats, or houses and flats) which comprises or includes the erection of a building or buildings (c) outside Central London and with a total floorspace of more than 15,000 square metres.*

3 Once Enfield Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or allow the Council to determine it itself.

4 The Mayor of London's statement on this case will be made available on the GLA website [www.london.gov.uk](http://www.london.gov.uk).

### **Site description**

5 The Stonehill Estate is 9.54 hectares in size and currently occupied by a series of industrial and office buildings bounded by Harbet Road to the east, Towpath Road to the west and Anthony Way to the south. The A406 North Circular Road meets with Harbet Road interchange just east of the site. The River Lee Navigation runs along the western boundary of the site, and the River Lee Diversion runs through the Lee Valley Regional Park to the east. There are also a series of reservoirs along this stretch of the Lee Valley, with Banbury Reservoir located to the south of the site.

6 The majority of buildings on site are used for purposes within Use Classes B1, B2 and B8 with some sui generis and retail use. Apart from the northern corner of the site, which was until recently occupied by the Lee Valley Business Centre (now demolished), the remainder of the site has complete building coverage, containing a total floorspace of 53,297 sq.m. There is also a network of internal access roads through the site, such as Silvermere Drive and Hawley Road.

7 The Stonehill Estate forms part of a conglomeration of industrial estates and large format retail stores to the north and south of the A406 North Circular Road. The Stonehill Estate together with the Hastingwoods Trading Estate to the south, form part of the Harbet Road Industrial Area, identified as a Strategic Industrial Location in Enfield Council's Core Strategy, which together with other industrial areas in Waltham Forest and Haringey, falls within the Central Leaside Strategic Industrial Location (SIL) as identified by Policy 2.17 of the London Plan (Annex A3.1 and Map 2.7). The site is also located within the Upper Lee Valley Opportunity Area as identified in London Plan Policy 2.13 (Map 2.4 and Annex One).

8 The nearest bus stops to site are located on the A406 off slips just north of the site. The nearest railway station is Angel Road, which is a kilometre from the site. The public transport accessibility level (PTAL) for the site is 1b where six represents high accessibility and one represents poor accessibility.

### **Planning history**

9 Although none of the planning history for the site is relevant to this case, the Council has included with its referral details of two connected applications, as required by paragraph 4(1)(b) of the Town & Country Planning (Mayor of London) Order 2008. These relate to two smaller sites adjacent to the southern boundary of the site, known as the Triangle site and the Silvermere site. The proposals for these two sites are similar. Both seek to demolish existing industrial warehousing and erect new buildings for purposes within Use Classes B1, B2 and B8. They are being brought forward independently of each other and the outline scheme so a quicker decision can be made to suit the timescales of a known end-user.

## Details of the proposal

10 The proposals seek to demolish the existing buildings and redevelop the site to provide up to 46,451 sq.m of industrial floorspace (Use Classes B1(c), B2 and/or B8). The application is submitted in outline form with only matters of access to be determined in detail at this stage.

## Strategic planning issues and relevant policies and guidance

11 The relevant issues and corresponding policies are as follows:

- Land use principles *London Plan;*
- Employment *London Plan; Land for Industry and Transport SPG;*
- Urban design *London Plan; Shaping Neighbourhoods: Character and Context SPG;*
- Blue ribbon network *London Plan;*
- Flooding *London Plan;*
- Inclusive access *London Plan; Accessible London: achieving an inclusive environment SPG;*
- Sustainable development *London Plan; Sustainable Design and Construction SPG; Mayor's Climate Change Adaptation Strategy; Mayor's Climate Change and Energy Strategy; Mayor's Water Strategy;*
- Transport and parking *London Plan; the Mayor's Transport Strategy*
- Crossrail *London Plan; Mayoral Community Infrastructure Levy.*

12 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the Enfield Core Strategy (2010); the saved policies of Enfield's Unitary development Plan (originally adopted in 1994, and further saved in 2007), and; the London Plan 2011 (with 2013 Alterations).

13 The following are also relevant material considerations:

- The Upper Lee Valley Opportunity Area Planning Framework (July 2013);
- Enfield Council's draft Central Leaside Area Action Plan (interim version May 2012);
- Enfield Council's Meridian Water Masterplan – Planning and Urban Design Guidance (July 2013).
- The Further Alterations to the London Plan (January 2014 consultation draft)
- The National Planning Policy Framework and Technical Guide to the National Planning Policy Framework.

## Land use principles

14 As noted in paragraph seven, the site is designated by London Plan Policy 2.17 as a Strategic Industrial Location (SIL), and is therefore part of London's main reservoir of industrial land, identified based on evidence of future need.

15 As noted in paragraphs five and six, the site also is within the Upper Lee Valley Opportunity Area (ULVOA) as identified on London Plan Map 2.4 and Annex One. London Plan Policy 2.13 seeks development in opportunity areas to maximise residential and non-residential output and

densities and contain a mix of uses as well as support wider regeneration objectives. The London Plan envisages that the ULVOA has capacity for 15,000 new jobs and 20,100 new homes.

16 Within the ULV Opportunity Area Planning Framework (ULV OAPF), the site is located in the Meridian Water area of Central Leaside, which is an identified growth area with the potential to deliver up to 5,000 new homes and 3,000 new jobs, and is noted as being the largest regeneration priority area in Enfield's Core Strategy (2010). Both the Central Leaside Area Action Plan (AAP) and the Meridian Water Masterplan (MWM), provide an outline vision for managing change and development in the area for the future, and the OAPF echoes many of these objectives. In short, the objectives of these documents are to deliver improved transport connections focussed on Angel Road station and pedestrian and cycle connections with a new bridge, maximise access to the Lee Valley waterways and regional park, regenerate and improve the appearance of the industrial areas and establish a new residential mixed-use neighbourhood, and promote a new grand civic public space along The Causeway connecting the eastern and western parts of the area.

17 In terms of industrial land designation, the OAPF indicates that the Harbet Road Industrial Area, where this site is located, is potentially suitable for mixed-use development given its proximity to Meridian Water, River Lee and the Lee Valley Regional Park. It is also noted however, that any re-designation of SIL will require further investigation through the Central Leaside AAP and a development plan review.

18 Both the draft Central Leaside AAP and the MWM investigate this further, and suggest that partial SIL release of the southern portion of the Harbet Road Industrial Area is appropriate to deliver the objectives of the masterplan. The northern part of the estate, where this site is located, is indicated for continued SIL protection apart from a narrow strip of land fronting the River Lee Navigation to allow for mixed-use development fronting the water to improve the appearance of the industrial area.

19 Whilst the Council's aspirations for Meridian Water and Central Leaside are supported as set out in the ULV OAPF, these are long-term aspirations that require further work and policy formulation. Indeed the MWM is guidance only, and it is clear that the Meridian East area (where this site is located) would be a later phase of the masterplan. The applicant asserts that as modern industrial and storage/distribution units tend to have an estimated life span of 20-25 years, and considering the Meridian East area of the masterplan is envisaged to come forward as a later phase, the current proposals to improve the employment facilities and create new jobs in the short to medium term, could be brought forward in a way which would not prejudice those aspirations. For instance, ensuring the key link across the river can still be delivered and that the development fronting the east bank of the River Lee Navigation includes some small commercial units and/or the uses that generate the most activity, the proposals go some way to delivering the aspirations of the masterplan in terms of the quality of environment and type of uses proposed. This is discussed in more detail in the urban design section.

20 In addition as the proposals are in outline form, there is adequate scope through the reserved matters stages for the exact siting and scale of the buildings to be negotiated and agreed with the Council in order to maximise the connections sought through the Council's vision, and the proposals therefore do not prejudice the long-term vision of the MWM or the AAP in that regard. GLA officers would however expect detailed proposals to be submitted for the canal side part of the proposal for the reasons detailed above, and outline proposals for the remainder based on design codes.

21 The proposals directly respond to current market demand and will result in a significant improvement in the quality of employment floorspace, and are fully in accordance with current strategic and local policy protecting land for industry in London. The proposals are therefore

supported from a strategic perspective, in accordance with London Plan Policies 2.13 and 2.17 and the ULV OAPF.

## **Employment**

22 The quantum of employment floorspace proposed is up to 46,451 sq.m, which represents a reduction in quantitative terms compared with the existing estate which provides 53,297 sq.m. Of the two linked planning applications referred to in paragraph eight, one proposes a slight increase in floorspace quantum, but the second also proposes a reduction, meaning there would be an overall reduction of 7,815 sq.m of industrial floorspace across the three sites as a whole.

23 However, what is lost in quantitative terms will be compensated for significantly in qualitative terms. The existing units are inefficient in layout, and the estate is dominated by servicing and access routes with inadequate car parking. The submitted Socio-Economic and Market Report states that vacancy levels have only remained healthy because the landlord has kept rent at an unsustainably low level in the knowledge that redevelopment proposals were being pursued. The replacement units will be modern with an improved appearance and more efficient layout, an increased employment density and an improved public realm with new landscaping.

24 The report states that the development has the potential to create in the region of 735 jobs, an increase of 465 jobs compared to the existing estate, and identifies that there is market demand for a large storage and distribution unit in the area with a lack of alternative provision or sites capable of meeting this demand. Whilst the OAPF and AAP both seek to diversify the range of business uses on the estate and promote low carbon and creative businesses, the report states that these types of uses are unlikely to locate to the Harbet Road Industrial Estate in the short to medium term, especially considering the proximity of Edmonton Eco Park. Nonetheless, the two layout options for the site propose a mix of flexible unit sizes to suit a range of business uses in response to the changing demands of the employment market. This diversification in the range of businesses potentially occupying the estate responds directly to the MWM objective.

25 GLA officers accept that the reduction in the quantum of employment floorspace is outweighed by qualitative improvements, to both the physical characteristics of the estate including the public realm improvements, and also the delivery of more jobs with an improved employment density. The proposals are therefore in accordance with the objectives of the London Plan, the draft Central Leaside AAP and the ULV OAPF, and are supported in strategic terms.

## **Urban design**

### Layout and ground floor activity

26 Whilst the site and surroundings are industrial in character, it is important that permeability and legibility through the site is maintained and improved so that members of the public can pass through the space and connect to other areas. It is particularly important that access to the regional park and the nearby transport interchanges is promoted. Whilst the layout removes a number of internal access roads within the estate, it retains the two key east-west routes to serve the new units and connect to wider areas, which is welcomed. It would also not necessarily compromise on the Council's vision for the alignment of The Causeway as set out in the ULV OAPF, the AAP and the MW masterplan. By reducing the number of connections to just these two straight and clearly legible routes, pedestrian movement and other commercial activity is concentrated and will help to animate the streets, rather than resulting in stark and inactive roads flanked by swaths of industrial sheds. To maximise street level activity, the design codes should commit to locating the active uses, such as ancillary offices or service desks to support the business use, on the corners of the ground floor plan.

27 As detailed in the design and access statement, the canal edge is a key asset to the scheme and the intention to landscape this area to provide new public realm is welcomed. As noted in paragraphs 19 and 20, the layout should be adapted to also include smaller commercial units and/or the commercial uses that generate the most activity along the length of the canal edge to promote pedestrian footfall and maximise activity. The proposals for this part of the site should also be submitted in detail to ensure the masterplan's aspirations for the east bank of the River Lee Navigation can be delivered.

28 The layout options put forward provide opportunities for retaining and enhancing the existing routes through the site, which is welcomed, although further clarification is needed that demonstrates how building frontages are optimised both along the canal edge and along the east-west connection routes through the site, while also balancing the ability to open up views through the site towards the neighbouring green belt.

29 Opportunities for extending the proposed public realm along Towpath Road around the northern boundary of the site, creating a buffer zone with the North Circular should be explored further and included within a spatial hierarchy of pedestrian routes, vehicular links and areas of public realm to form part of the design code. This should include indicative visuals to demonstrate the different character areas within the site.

#### Form, height and architecture

30 As the application is in outline form, details of the scale, height and appearance of the units are unknown at this stage. The intention to include a landmark building of up to 20 metres in height at the northern end of the site can be supported subject to an appropriately defined access arrangement along the northern boundary of the site. Reducing the scale of development towards the southern end of the site will give massing variation and acknowledge the setting of the Banbury Reservoir and surrounding green belt, which is welcomed. The design and access statement includes indicative details and examples of similar units which the design intends to follow, and these appear suitable for the uses proposed and would be a significant improvement on the appearance of the estate.

### **Flooding**

#### Flood risk

31 A Flood Risk Assessment (FRA) has been undertaken by SKM Environs, which confirms that the site is within flood zones two and three and is also within an area at risk of potential reservoir flooding, in the unlikely event of a reservoir failure. Surface water and ground water risks are minimal in this location. As the proposals are for industrial/storage land uses which are considered to be less vulnerable to flood risk, a low level of risk can therefore be accepted.

32 The FRA demonstrates that in a 1 in 100 years flood event, flooding would affect the site but this would mainly affect the highways and parking/service yard areas. Nonetheless, the FRA recommends that building floor levels are elevated to 10.9 metres AOD to reduce the risk of internal building flooding. It also recommends drawing up emergency flood response plans for each building and signing up to Environment Agency's flood warnings, which are both welcomed. Careful attention needs to be paid to the access and egress arrangements for staff and visitors to the buildings under flood conditions.

33 The measures proposed assist in reducing the impact of any flood event, although further precautions could be taken by requiring that flood resilient design is applied to any permitted buildings. Such measures should include the raising of electrical and telecoms circuits and cabling to an elevated height above floor level and the siting of any sensitive utilities or electrical



equipment at either an elevated height or within a flood proof enclosure. Such measures will improve the resilience of the buildings and should be capable of being built at minimal additional cost if designed in from the outset.

34 The FRA also demonstrates that the completed development will result in a net increase in the amount of flood storage volume available, therefore giving a small benefit in overall flood risk terms for other sites in the Lee Valley, which is welcomed. These flood awareness and resilience measures should be secured by an appropriate planning condition.

#### Surface water run-off

35 The FRA states that the development will reduce surface water discharge by at least 50% through the use of storm water attenuation tanks. This approach is acceptable in terms of London Plan Policy 5.13 and should be secured by an appropriate planning condition.

### **Inclusive design**

36 The aim of London Plan policy 7.2 is to ensure that proposals achieve the highest standards of accessibility and inclusion. Inclusive design principles if embedded into the development and design process from the outset help to ensure that everyone, including older people, disabled and deaf people, children and young people, can use the places and spaces proposed comfortably, safely and with dignity. Further information can also be found in the consultation draft of the Accessible London SPG: <http://www.london.gov.uk/priorities/planning/consultations/draft-supplementary-planning-guidance-on-accessible-london>

37 The Council should ensure that when dealing with the detailed stages of the application, full details are secured showing how disabled people access each of the entrances safely, and includes details of levels, gradients, widths and surface materials of the paths and how they are segregated from traffic and turning vehicles etc, and how any level changes on the routes will be addressed.

### **Climate change mitigation and adaptation**

38 The applicant has broadly followed the energy hierarchy and sufficient information has been provided to understand the proposals. In line with GLA energy planning guidance, the carbon emissions and savings must be calculated against Part L Building Regulations 2013, and must therefore be recalculated based on this software. The guidance is available at:

[http://www.london.gov.uk/sites/default/files/GLA%20guidance%20on%20preparing%20energy%20assessments%20April%202014%20final\\_2.pdf](http://www.london.gov.uk/sites/default/files/GLA%20guidance%20on%20preparing%20energy%20assessments%20April%202014%20final_2.pdf)

#### Energy efficiency standards

39 A range of passive design features and demand reduction measures are proposed to reduce the carbon emissions of the proposed development, with both air permeability and heat loss parameters improved beyond the minimum backstop values required by the Building Regulations. Other features include low energy lighting and controls, variable speed drives, zoned lighting and ventilation. The main warehouse areas will be treated only with frost protection (i.e. no heating and cooling demand except in the office spaces).

40 The information provided suggests that the development meets Part L 2010 by efficiency alone, although the applicant should assess the development's performance under Part L 2013 and commit to meeting Part L 2013 by efficiency alone. BRUKL sheet including efficiency measures alone should be provided to support the savings claimed (please provide these electronically and in

full as the BRUKL page appended to the sustainability statement was incomplete and very difficult to read in hard copy).

#### District heating

41 The applicant has identified that the Upper Lee Valley district heating network is within the vicinity of the development. However, given the low heating demand from the development, the applicant does not propose to connect to the network. Further detail on the breakdown of energy demands within the development needs to be provided to determine whether this argument is acceptable. Given the location of the site within the Upper Lee Valley Opportunity Area and in the vicinity of the proposed network, evidence of correspondence with the network developer should be provided to demonstrate that the opportunity has been properly assessed.

#### Combined heat and power (CHP)

42 Due to the intermittent nature of the heat load, CHP is not proposed. Whilst this seems reasonable in principle given the nature of the buildings proposed, further information on the breakdown of energy demands for the development needs to be provided before the argument can be deemed acceptable.

#### Renewable energy technologies

43 The applicant has investigated the feasibility of a range of renewable energy technologies and is proposing to install 1,880 sq.m of solar PV on the roof of the buildings. A roof plan should be provided showing how the proposed installation will be integrated within the development, and the carbon savings from the PV should be calculated using Part L 2013 methodology and emission factors.

#### Overall carbon savings

44 Based on the energy assessment submitted, the applicant is proposing to meet London Plan Policy 5.2 by efficiency and renewables. The carbon emissions and savings should be resubmitted using Part L 2013 and the comments above should be addressed before compliance with London Plan energy policy can be verified.

### **Transport for London**

#### Meridian Water Masterplan

45 As noted earlier in this report, the site falls within the area of the Meridian Water Masterplan, and it is not currently clear that the proposal accords with the masterplan's transport proposals. In particular, The Causeway, Angel Square and Angel Bridge are important elements of the masterplan seeking to improve pedestrian and cycle links and bus connectivity to support the regeneration envisaged. Of prime importance to TfL is that a bus route across the Lee Navigation linking the east and west masterplan areas is provided. TfL also supports the masterplan proposal to develop the Lee Navigation for freight use and potentially of using the corridor for a local power link from nearby Edmonton Eco Park. These need careful consideration in relation to each other and future land uses at the application site, and TfL requires further information on these aspects in relation to this development.

46 As noted earlier, the vision for Meridian East and the industrial land directly south of the site is for a mixed use neighbourhood. An Arriva bus garage is currently located on part of this land which would need to continue functioning successfully either at, or in the vicinity of its existing location. As the area where it is currently located is indicated for mixed-use development,

the application site may need to be considered in the future as an alternative location to support the improvement of bus services in the area necessary to support regeneration objectives, in accordance with Policy 6.2 of the London Plan and Land for Industry and Transport: Supplementary Planning Guidance (September 2012).

47 Vehicular access to the bus garage is not ideal currently and could be impeded further by the proposal as a result of overspill parking and/or the operation of HGV's. It could also be impacted by new residents to the area from the mixed use neighbourhood contemplated by the masterplan, but who would seek an environment without 24/7 bus operations.

48 The land east of Harbert Road is currently used for car parking and is indicated in the application documents as being retained for this purpose (although it is outline the red line boundary). TfL require clarification on the proposed use and arrangements for parking and servicing for the development within the application site boundary and adjacent areas.

#### Trip generation and modal split

49 A reduced employment floor area for a similar mix of uses is proposed and so it is possible that trip numbers could fall. However, given that the employment density has the potential to increase (as noted in paragraph 23), and a flexible permission for B1(c), B2, and B8 is sought, there could be an increase in the number of trips. The applicant should clarify their intentions over employee numbers and flexible land uses, and ensure that the TA includes existing and expected employee numbers with trip generation based on those figures.

50 For TfL to judge the acceptability of the access arrangements, consistent information on existing and proposed car parking is needed. According to the TA there is a maximum accumulation of 57 vehicles within 122 spaces. However, peak turnover from the existing use is 465 vehicles during the AM peak, and 470 vehicles during the PM peak. Car parking provision according to the application form is zero, whilst there is a reference to a range between 77 and 465 within the TA.

51 The impacts above could be mitigated in transport terms through a travel plan, measures to improve pedestrian and cycle routes, public transport measures, car park management, and cycle and car parking. TfL will require these measures but would expect the applicant to provide further details as part of a revised TA.

52 The mode of travel in the TA is based on travel to work in the local ward, and TfL require clarification that this relates to those employed in the area and is not based on residents. If the ultimate occupiers are predominantly B2 and/or B8 users, there is a potential for increased servicing especially from HGV traffic. A significant increase in HGV's in peak hours may impact upon traffic congestion and the reliability of buses on the A406 and would require mitigation. In any circumstance, TfL encourage a development-wide logistics plan to lessen peak activity and reduce the proportion of empty or half empty vehicles generated by the scheme as a whole.

#### Bus facilities on site

53 In addition to the retention of the Arriva bus garage noted in paragraph 45, land for a bus terminus/standing space of up to four stand spaces will be required in order to accommodate two high frequency bus services which is recommended for the size and scale of development outlined within the Meridian Water Masterplan. This is needed in addition to a route through the site and over the Lee Navigation.

### River Lee Navigation

54 As noted above, the numbers of HGV's could increase as a result of the proposals. In this context, the potential to use water for freight as well as for waste and construction should be considered in the long term.

### Car and cycle parking facilities

55 It is unclear what level of car and cycle parking is proposed, and the provision for Blue Badge holders, electric vehicle charging points and showers and other facilities for cyclists. These should be in accordance with the London Plan, albeit given the outline stage, any condition could allow flexibility with confirmation at the detail design stage when there is more certainty on end users.

### Pedestrian environment and cycle access

56 The TA does not propose any measures to improve pedestrian or cycle links to the area. Given the severance effect of the Lee Navigation and A406, it is important that measures to improve these links are secured to support travel by cycle and foot to the site. The applicant should also assess walking routes from the point of view of wheelchair users and those with visual impairments and other mobility constraints. An audit of pedestrian routes and public transport stops and interchanges should be undertaken.

57 If a pedestrian and cyclist only bridge is taken forward in the masterplan, then TfL strongly recommend that the development be made bus accessible so that the site can be fully served. Details of bus accessibility would need to be agreed with TfL.

58 TfL could agree to a flexible approach where these audits are undertaken at a later stage when more detail is known about end users (say within 500 metres by foot, nearest bus stops and two kilometres by cycle). However, an upfront commitment should be given to fund pedestrian and cycle links to site and accessibility improvements to encourage public transport use, walking and cycling. TfL anticipate that most of this work would be on borough roads, and so not for TfL to deliver.

### Travel plan, servicing and construction

59 TfL welcomes the submission of a travel plan. It is requested that this is monitored closely through the S106 agreement to ensure, for example, the aspirations for mode share are realised and the issues raised above on car and cycle parking are controlled. TfL is willing to focus on a target related to proportion of drivers, and would seek a progressive approach to targets, such that each year they become more challenging (reporting is recommended at one, three and five years). For staff, it makes sense to organise an annual survey; for customers, it may be on a more ad-hoc basis. Stated preference surveys should be cross-checked with observed use of the car park and bus stops.

60 Each tenant should require their suppliers to adopt the work related road risk requirements for the construction industry through the CLoCS (<http://www.clocs.org.uk/>) project for safety. This should be required within one year of commencement and compliance against those requirements should be monitored with a target of greater than 90% compliance by year two. For further information visit: <https://www.tfl.gov.uk/cdn/static/cms/documents/clocs-standard-for-construction-logistics.pdf>. TfL also recommend using operators who are member of the fleet operators recognition scheme – [https://www.fors-online.org.uk/index.php?page=P\\_LANDING](https://www.fors-online.org.uk/index.php?page=P_LANDING)

61 It is expected for a scheme of this size that a construction logistics plan and a delivery and servicing plan be submitted and this should be approved by the Council and TfL prior to commencement of development. These documents should also follow TfL's best practice guidelines and should be secured by condition.

#### Community Infrastructure Levy (CIL)

62 In accordance with London Plan Policy 8.3, the applicant is required to contribute to CIL for the increase in floorspace of the new development compared to the existing uses. Further details can be found at: <http://www.london.gov.uk/publication/mayoral-community-infrastructure-levy>.

### **Local planning authority's position**

63 The applicant has had pre-application meetings with Enfield Council and pre-application advice issued indicates that the Council is unlikely to accept the proposal. The officers' advice raises concern with the reduction in employment floorspace and the lack of integration with the key themes that underpin the vision of Meridian Water, as set out in the Meridian Water Masterplan and draft Central Leaside AAP.

64 Council officers have indicated that the application is likely to be recommended for refusal and presented to the planning committee in October 2014.

### **Legal considerations**

65 Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 of the Order to refuse the application, or issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application and any connected application. There is no obligation at this present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

### **Financial considerations**

66 There are no financial considerations at this stage.

### **Conclusion**

67 London Plan policies on the **principle of development, employment, urban design, flooding, inclusive access, sustainable development and transport** are relevant to this application. The application complies with the majority of these policies and is strongly supported but further information is needed in order to fully comply with the London Plan. The potential remedies to issues of non-compliance are set out below:

- **Principle of development:** The proposals are supported in strategic terms and are in accordance with London Plan Policy 2.17, the ULV OAPF, and the draft Central Leaside AAP, seeking to retain and improve the quality of London's industrial land. The proposals

also respond to current market demand and will result in a significant improvement in the quality of employment floorspace.

- **Employment:** Whilst there would be a reduction in the quantum of employment floorspace, there would be a significant improvement in its quality, with a more efficient layout and subsequent increase in employment density, which is supported in strategic terms.
- **Urban design:** The design code should include further detail on ground floor uses and building frontages and commit to locating smaller commercial units, offices or service desks along street and canal edges to promote pedestrian footfall and maximise activity. Opportunities for extending the public realm along Towpath Road at the northern boundary of the site, creating a buffer zone with the North Circular should be explored further.
- **Flooding:** The site is at risk of flooding, although given the nature of the proposed land uses and the mitigation measures suggested, the proposals are acceptable in flood risk terms from a strategic perspective. The resilience of the buildings could be further improved with some relatively easy and minimal cost flood resilient design measures and it is recommended that these are included in the detailed building design.
- **Inclusive access:** The Council should ensure that at the detailed stage of the application, the proposals include inclusive access principles and conditions should be attached to secure these principles.
- **Climate change:** The energy hierarchy has been followed the applicant is proposing to meet London Plan Policy 5.2 by efficiency and renewables. The carbon emissions and savings should be resubmitted using Part L 2013 and the comments above should be addressed before compliance with London Plan energy policy can be verified.
- **Transport:** TfL require further information on how this scheme fits into the wider Meridian Water Masterplan, in particular the opportunities to improve bus accessibility through the site and other operational bus aspects to ensure the future regeneration of the wider area. TfL encourage the use of the Lee Navigation for freight, and requests further technical information related to on and off site car parking, employee numbers, mode of travel to work within the employment catchment area, cycle parking, pedestrian, cycle routes, road safety audits, and swept paths for HGVs/ buses. The travel plan, delivery and servicing plan and construction logistics plan should be secured by condition or within the s106 agreement.

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## **14/02806/OUT, Stonehill Estate, Silvermere Drive**

### **Response to the GLA Report of 17<sup>th</sup> September 2014; ref D&P/28flb/01**

The purpose of this note is to provide a commentary, from a planning policy perspective, on the GLA's response to the Stonehill planning application Reference 14/02806/OUT.

The GLA's response to the Stonehill application 14/02806/OUT states strong support for the principle of the scheme in strategic terms, subject to compliance with the issues set out in paragraph 67 of the GLA report.

I strongly disagree with the GLA's position, since the proposed scheme clearly contravenes the strategic policies and aspirations of the Mayor's Upper Lee Valley Opportunity Area Planning Framework (2013), the Council's adopted Core Strategy (2010), and the Meridian Water Masterplan (2013). It is noted that both of the latter documents were endorsed by the GLA. Furthermore, the proposed scheme fails to meet the policy requirements of the Proposed Submission Central Leaside Area Action Plan (2014).

The main areas of disagreement and my response are set out below:

#### **Strategic planning issues and relevant policies and guidance**

##### GLA Report section 11

- The relevant issues and corresponding policies should also refer to 'Opportunity and Intensification Areas', as per Annex 1 of the London Plan.

#### **Land use principles**

##### GLA Report section 15

- The Report's reference to the '*Enfield Upper Lee Valley Opportunity Area (ULVOA) as identified on London Plan Map 2.4 and Annex One*', is agreed. '*London Plan Policy 2.13 seeks development in opportunity areas to maximise residential and non-residential output and densities and contain a mix of uses as well as support wider regeneration objectives. The London Plan envisages that the ULVOA has capacity for 15,000 new jobs and 20,100 new homes*'.
- This policy support is critical to the coordinated and effective development of Meridian Water as a dense, modern urban quarter that fully capitalises on the opportunities for housing and jobs which this area of London so critically requires, and that the huge investment in the area is making possible.

GLA Report section 15

- The GLA's reference to the ULVOAPF and Core Strategy as identifying Meridian Water as Enfield's largest regeneration priority area which will deliver up to 5,000 new homes and 3,000 new jobs, is agreed.
- The GLA's view that the '*objectives of these documents are to deliver improved transport connections focussed on Angel Road station and pedestrian and cycle connections with a new bridge, maximise access to the Lee Valley waterways and regional park, regenerate and improve the appearance of the industrial areas and establish a new residential mixed-use neighbourhood, and promote a new grand civic public space along The Causeway connecting the eastern and western parts of the area*', is also agreed.

GLA Report section 19

- I strongly disagree with the GLA report wording that the ULVOAPF and Core Strategy are '*aspirations*' for the future of Meridian Water. The GLA report should reflect the fact that the future of Meridian Water is set out in **policy**, for example Core Policies 37 and 38 on Central Leaside and Meridian Water.
- The GLA report states that there is a requirement for '*further work and policy formulation*' on these '*long-term aspirations*', and it therefore appears that the GLA has omitted to take account of the Meridian Water Masterplan, or the Proposed Submission Central Leaside AAP, which clearly set out detailed work and policies.
- The GLA report also incorrectly accepts the applicant's timeframe of 20-25 years. In fact, the timeframe for the regeneration of Meridian Water is much shorter than this, with work on the western part of the site at Angel Road station underway by 2017, with regeneration progressing eastwards over the subsequent years.
- It should be noted that the Meridian Water Masterplan, adopted by Enfield Council in 2013, is not merely '*guidance only*', and provides a *material consideration* in planning decisions.
- It is also noted that the GLA response completely fails to mention the Mayor's Housing Zone Prospectus (June 2014), which contains a joint foreword by the Mayor and the Chancellor of the Exchequer. Amongst other things this refers to '*...taking action to make sure all families can get a home of their own...*', '*the need to regenerate whole areas of our cities that are wasted*', '*...put in infrastructure...*', and how Housing Zones are '*...designed to get brownfield sites across London ready for new homes.*' This is not an academic point because page 29 of the Prospectus outlines Meridian Water as a case study, where it is said that the London Borough of Enfield '*will create a new neighbourhood of up to 5,000 homes and deliver up to 3,000 new jobs by 2026*' and that a '*Housing Zone designation could greatly accelerate housing delivery...*'. LBE submitted a bid for Housing Zone funding at the end of June 2014; the first Council in London to do so. So the GLA in its response to the Stonehill application is contextually deficient and this has some importance as the Housing Zone Prospectus and submission clearly indicates that there is a real ambition to accelerate delivery.
- The Causeway route through Meridian Water is a key element of the regeneration of the area. The requirement for the Causeway is established in Core Policy 38, with the route established in the MW Masterplan (2013) and the Proposed Submission Central Leaside AAP (2014). Detailed work on the Causeway considers the feasibility of the route, for example by taking account of land ownership. Unfortunately the proposed development does not consider the Causeway route as established in Enfield's planning documents, and supported by the ULVOAPF.



- It is simply not true, as the GLA report states, that the proposal ensures that the '*key link across the river can still be delivered*' - the proposal in no way attempts to do this. Through overlaying its proposals without taking account of the route, the application disregards the very considerable and expensive work undertaken by the Council to ensure a feasible Causeway which will enable successful overall delivery of the vital Meridian Water regeneration site.
- With regard to the east bank of the River Lee Navigation the GLA report mistakenly states that through '*some small commercial units and/or the uses that generate the most activity, the proposals go some way to delivering the aspirations of the masterplan.*' The Council must point out that the GLA view is quite mistaken here, since the proposal in no way commits to small commercial units and therefore it does not support delivery of the MW Masterplan in terms of the quality of environment and type of uses proposed.

#### GLA Report section 20

- At this outline stage, and contrary to the GLA's view, the proposal clearly prejudices the long-term vision of the MW Masterplan and the AAP. This is due to its failure to take account of the Causeway route, the need for higher density and higher value business uses, and the need for housing delivery to the south of the Harbet Road site. It will not be possible at the reserved matters stage to overcome the very significant matters with which the Council disagrees.

#### GLA Report section 21

- It is highly contradictory to read at the beginning of the paragraph that the GLA considers the proposals '*respond to current market demand*' and the policies for industrial land, and then to link this to the strategic perspective as set out by London Plan Policies 2.13 and 2.17 and the ULV OAPF. The Council's view is that the strategic perspective should relate to the long term rather than merely the current market, and takes the strategic view that proposals which affect the future of Meridian Water should always take full account of the policy requirements for 5,000 new homes, 3,000 new jobs and transformational improvements to the infrastructure and environment.

### **Employment**

#### GLA Report section 23

- Whilst the GLA report and the Council are in agreement that the existing industrial estate suffers numerous issues such as poor environmental quality and access roads, the GLA report does not discuss the strategic policies for this site which are established in the London Plan, ULVOAPF, Core Strategy, MW Masterplan and Proposed Submission Central Leaside AAP, and which require environmental and layout improvements that are of a higher quality than those in the application. Furthermore, the proposals fail the crucial requirement to properly integrate the development with the Meridian Water regeneration, and with the existing communities and landscape features.
- This section of the GLA report also makes positive references to job density and landscaping which the Council strongly disagrees with and which will be discussed further, below.

GLA Report section 24

- I am very disappointed indeed that the GLA report accepts the applicant's assertions at face value and has a strong set of evidence and arguments that the proposal does not provide the jobs solution which it purports to do.
- The Proposed Submission Central Leaside AAP, through policy CL10, sets out the expectation for part of the Harbet Road Estate (including some of the Stonehill application site) to become an Industrial Business Park (IBP), with employment uses B1a/b/c that are suited to the greatly improved environment at Meridian Water and which do not conflict with the neighbouring residential uses established in the MW Masterplan and AAP.
- A careful reading of the proposal reveals that the jobs figure quoted is based upon the most optimistic, best case scenario assessment in terms of job density and use type, and that calculations using other, equally valid assumptions, would lead to considerably lower estimates. For example, the applicant's total assumes 36% of the floorspace to be B1c, despite not stating the proportion of such a use in the application, and therefore this figure is highly speculative. It is surprising that the GLA missed this point.
- The 'increase' in job numbers is based upon what the applicant describes as 'current estimates' – these estimates are lower than those made by the Council using ONS job figures from the area. Since the existing jobs figures are higher than those stated by the applicant, it is likely that the proposal is significantly inflating the real increase.
- The GLA report refers to 'layout options' – it should be noted that these plans (Drawing no.s 30371-PL-120B and 30371-PL-121B) are illustrative only, and therefore simply offer no real understanding of the final layout of the site. Instead, reference should be made to the Development Parameter Plan (drawing no. 30371-PL-104D), which indicates only the four main sites and road layout, and does not indicate individual unit sizes.
- The GLA should not have endorsed the applicant's attempts to dismiss the MW Masterplan objectives, and Core Strategy and Proposed Submission CLAAP policies, on diversifying the range of business. The policy requirements towards higher value and creative industries are not only essential to meeting the job density requirements for the area, but are entirely consistent with the GLA-agreed strategy of a comprehensive regeneration of the Meridian Water area. As discussed above, the applicant's definition of short and medium term should not be accepted, since the timeframes for Meridian Water regeneration, including at the eastern part of the development, are far less than the 25 year lifespan of the proposed buildings as asserted by the applicant.
- It is particularly surprising that the GLA has apparently accepted the applicant's assertion that the Edmonton Eco Park incinerator will negatively affect the prospects for higher value industry, considering that the GLA has also endorsed the delivery of 5,000 new homes in the surrounding area. The presence of the Eco Park has not prevented the successful siting and operation of the nearby large IKEA store, and the incinerator facility is scheduled for renewal which will lead to an even lower impact. The GLA's response seems to be just plain wrong.

## Urban design

### GLA Report section 26

- The GLA's assertion that '*permeability and legibility through the site is maintained*', since the current estate is difficult to navigate and comprehend, particularly for pedestrians and cyclists, is really very difficult to understand.
- Whilst I can agree with the GLA asserting the desire that '*access to the regional park and the nearby transport interchanges is promoted*', the proposed design does little to meet this requirement, for example failing to take account of the critical Causeway link, not setting out the actual treatment of canal-side/ Towpath Road area, and not providing a design that is amenable for pedestrian and cyclists.
- The GLA report states that the proposal would '*not necessarily compromise on the Council's vision for the alignment of The Causeway*', a statement which, by its own use of the wording of 'not necessarily', effectively concedes that the proposal may very well have a negative impact on the Causeway. In fact, it is clear that the proposal would compromise the alignment of the Causeway, as set out in the ULVOAPF, the MW Masterplan and the Proposed Submission CLAAP, for the reasons already set out under the response to section 19 above.
- It is not clear why the GLA report states that '*by reducing the number of connections to just these two straight and clearly legible routes, pedestrian movement and other commercial activity is concentrated and will help to animate the streets, rather than resulting in stark and inactive roads flanked by swaths of industrial sheds*' - this statement seems to be positively elaborating upon the facts of the application itself. In reality, the proposal is for an industrial development which will consist mostly, and possibly exclusively, of B8 distribution and logistics uses. Such development typically requires large buildings of a size and type which do not in any way lend themselves to active frontages, or streets 'animated' with pedestrians and cyclists. Furthermore, the necessary entrance and exit of heavy goods vehicles (HGVs) throughout the day does not correspond to the requirements of the Proposed Submission CLAAP policy CL1 for a Causeway route which is navigable and safe along its entire length for cyclists and pedestrians.

### GLA Report sections 27-28

- The canal edge is a key asset in the Meridian Water area, and yet the proposal provides little indication of its final treatment. The proposal does not indicate, as the GLA report states, any firm '*intention to landscape this area to provide new public realm*', since the maps showing this are illustrative only (Drawing no.s 30371-PL-120B and 30371-PL-121B).
- Instead, attention must be directed towards the Development Parameter Plan (drawing no. 30371-PL-104D), which shows the canal edge and Towpath Road as a road with vehicular access, presumably including for HGVs, with no specific landscaping or provision for cyclists and pedestrians (note that the arrows denoting vehicular, cyclist and pedestrian movements are merely proposed), as required by Proposed Submission CLAAP policies 8 and 26.
- The GLA report refers to the application's need for '*further clarification*' on the building frontages, and that along Towpath Road opportunities to extend the public realm around the northern boundary of the site '*should be explored further*'. It is extremely concerning that such essential aspects of the area are liable to not be fully

and properly considered at any later stages of the application, and that in this event the Meridian Water regeneration would be severely compromised.

#### GLA Report sections 30

- Whilst the outline application does not contain details of the scale, height and appearance of the units this stage, the two full applications received (14/02807/FUL and 14/02808/FUL) are of a scale and massing which, together with the large building footprints, would be unsympathetic and overbearing within their surroundings.

#### **Flooding**

#### GLA Report sections 35

- Given that the development site lies within a flood zone, the design and access statement for the proposal does not make clear any SUDS strategy. The development presents a huge opportunity to integrate elements of SUDS as part of the landscaping, for example designing streets with swales, and planting to create a comprehensive green network that connects to the wider green network of the Lee Valley Regional Park.

#### **Climate change mitigation and adaptation**

#### GLA Report section 41

- The view of the Council is that the LVHN pipe network will be nearby and that any heat demand would be beneficial to LVHN, while reducing the carbon footprint of the building. It is feasible to connect, and this would save carbon dioxide emissions, improving the environmental sustainability of the proposed scheme. It would also benefit the scheme since the development will not need to provide its own boiler plant and plant room space, gas supply, Clean Air Act compliant flues, and the operation and maintenance of the plant. The proposal would therefore be contrary to policies DMD 52 and CL30. The LVHN was, it should be noted, recently launched at an event held at the GLA.

#### **Transport for London**

#### GLA Report section 45

- As the TfL comments make clear, *'the Causeway, Angel Square and Angel Bridge are important elements of the masterplan seeking to improve pedestrian and cycle links and bus connectivity to support the regeneration envisaged.'*
- The proposal however, through failing to take account of the Causeway, or of the need for suitable and high quality pedestrian and cycle routes through the area, will simply not meet the policy requirements for access to the improved Angel Road

railway station, improved access to the Lee Valley Regional Park, access throughout the Meridian Water area, and connections beyond to existing communities.

## **Conclusion**

### GLA Report section 67

- For the reasons discussed above, I cannot, in planning policy terms, agree with the GLA's conclusions on the principle of development, employment and urban design.
- Furthermore, the Council considers that the residential elements of the MW Masterplan and Proposed Submission AAP, which show housing to the south of the Harbet Road site and across the River Lee Navigation to the west, should also form part of the GLA Report assessment. This is particularly the case given the acute requirement for housing delivery established in the FALP, and the status of Meridian Water as a key location for housing delivery as established in policy, and other, documents.

Paul Walker MRTPI MIED FRSA  
Assistant Director  
Regeneration and Strategic Planning

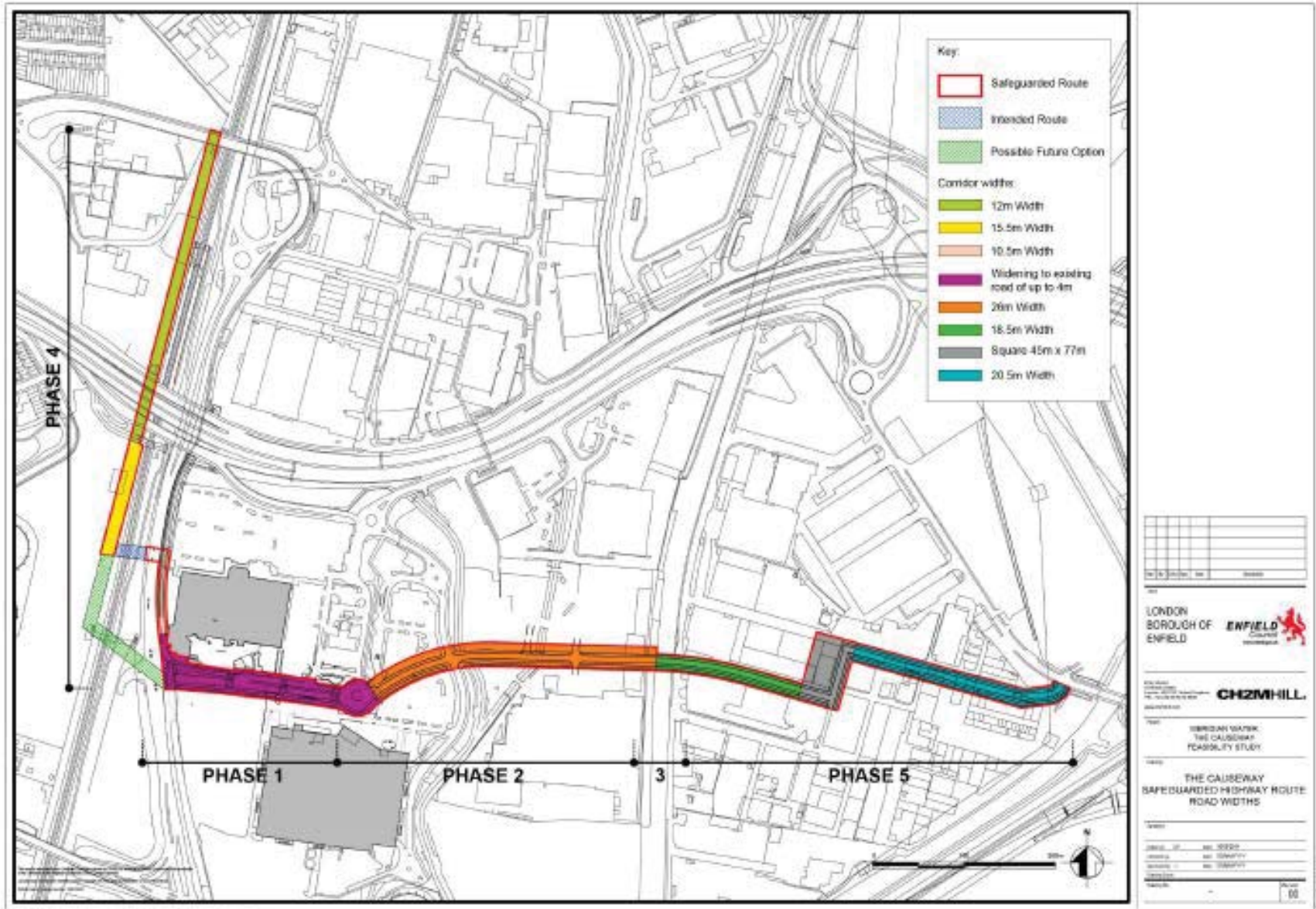
### Contact:

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020 8379 3805

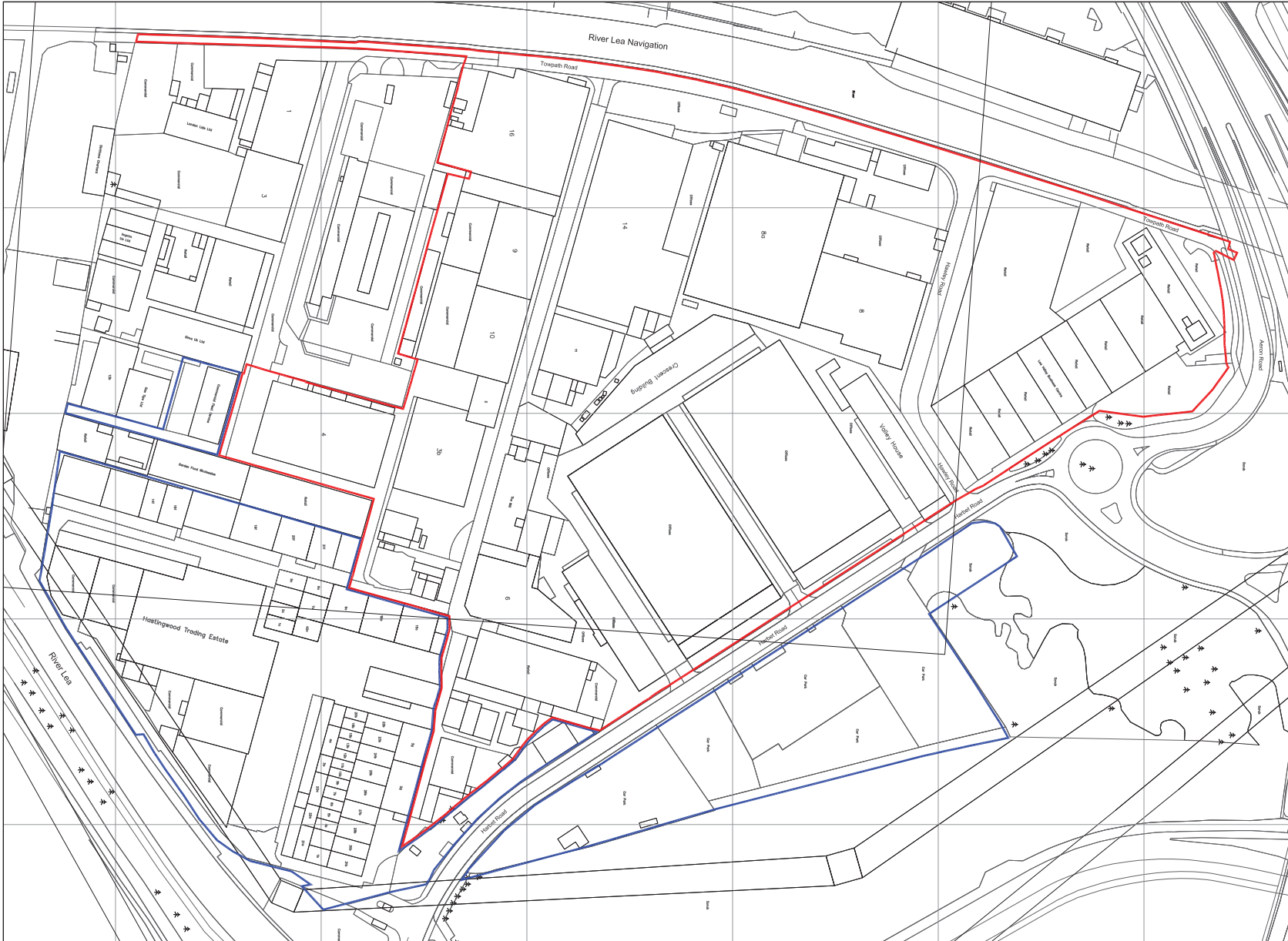
Or

James Gummery MRTPI MA  
Principal Planner  
020 8379 3498

# Phase 2 Preferred Alignment: Safeguarded Highway Route

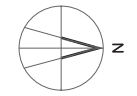
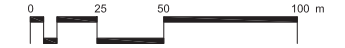


## **14/02806/OUT Drawings Plans**



**NOTES:**

SUBJECT TO STATUTORY CONSENTS  
 BASED ON GREENHATCH GROUP'S  
 TOPOGRAPIHICAL SURVEY,  
 DRAWING REF: TS4\_C01\_REV 2,  
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**FAIRACRE**



**LASALLE INVESTMENT MANAGEMENT**

TITLE			
STONEHILL ESTATE, ENFIELD			
DRAWING			
SITE LOCATION PLAN			
CLIENT			
FAIRACRE & LASALLE INVESTMENT MANAGEMENT			
DATE	SCALE	DRAWN	
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STATUS		CHECKED	
PLANNING		AW	
DRAWING NUMBER			
30371-PL-107C			

01 SITE LOCATION  
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**LEGEND**

- CORE DEVELOPMENT ZONE
- PROPOSED MAIN VEHICULAR ACCESS LOCATIONS
- MAIN ACCESS POINTS FOR CYCLISTS AND PEDESTRIANS
- ROADS
- STRUCTURAL LANDSCAPING
- LIMIT OF BUILDING FRONTALAGE ON SENSITIVE BOUNDARIES
- APPLICATION BOUNDARY

REV	DATE	NOTE	DRAW	CHECK

**MICHAEL SPARKS ASSOCIATES**

**LASALLE INVESTMENT MANAGEMENT**

**FAIRACRE**

<b>TITLE</b>		
STONEHILL ESTATE, ENFIELD		
<b>DRAWING</b>		
DEVELOPMENT PARAMETERS PLAN		
<b>CLIENT</b>		
FAIRACRE & LASALLE INVESTMENT MANAGEMENT		
<b>DATE</b>	<b>SCALE</b>	<b>DRAWN</b>
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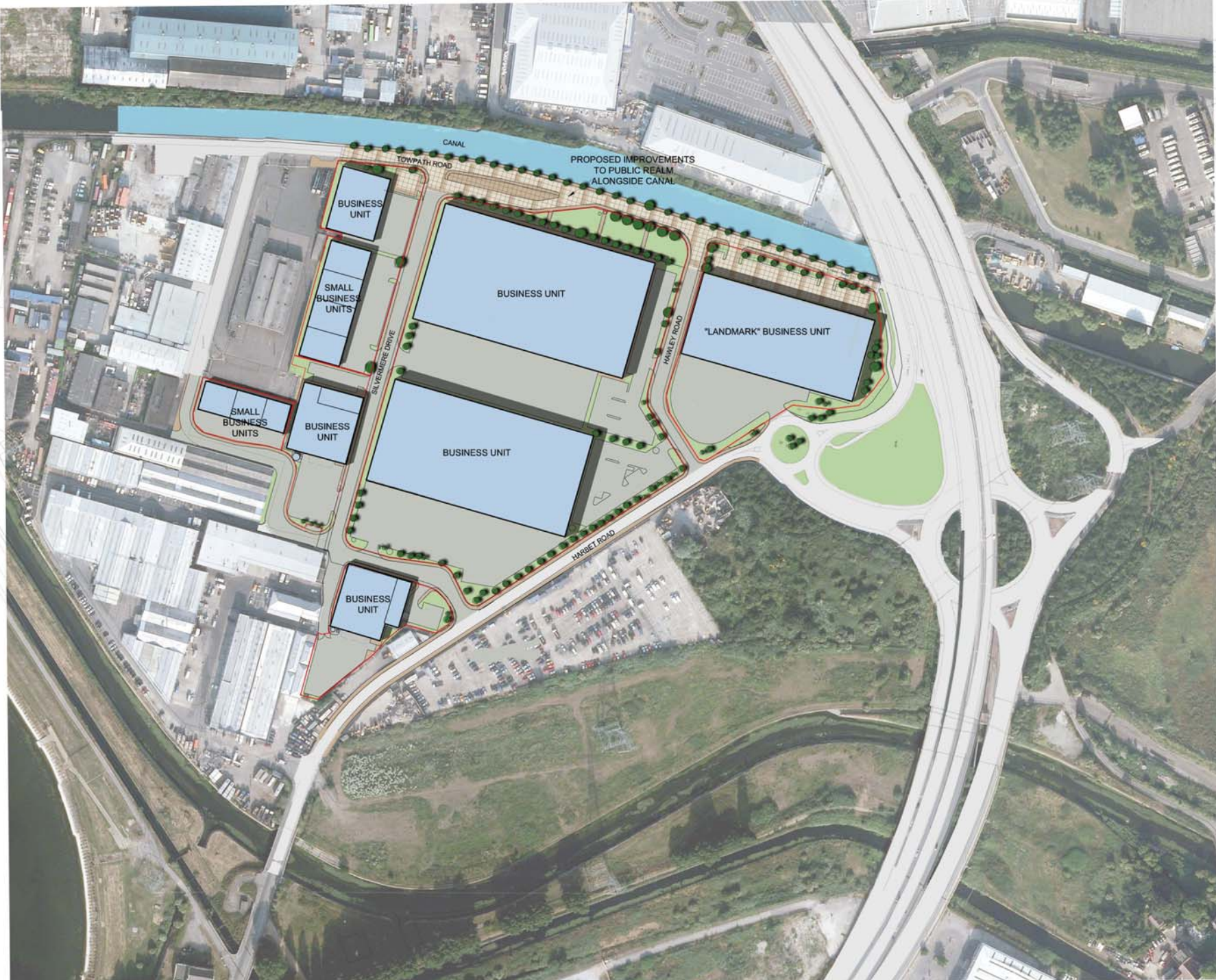


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 DRAWING  
**ILLUSTRATIVE MASTERPLAN  
 OPTION 1**  
 CLIENT  
**FAIRACRE &  
 LASALLE INVESTMENT MANAGEMENT**

DATE MARCH 2014	SCALE 1:1250@A1	DRAWN IN
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**30371-PL-120B**



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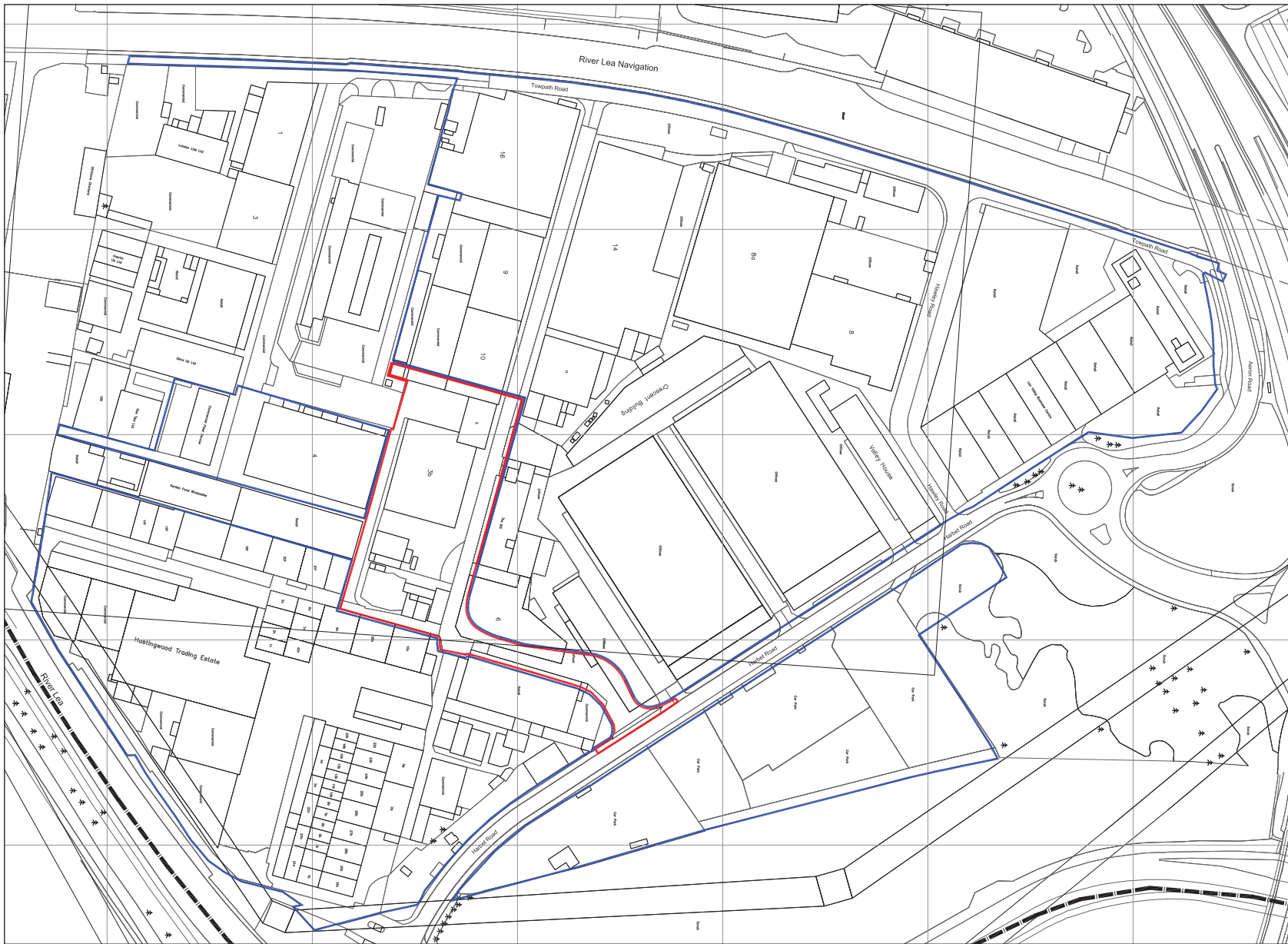


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 OPTION 2**  
 CLIENT  
**FAIRACRE &  
 LASALLE INVESTMENT MANAGEMENT**

DATE MARCH 2014	SCALE 1:1250@A1	DRAWN IN
STATUS PLANNING	CHECKED AW	

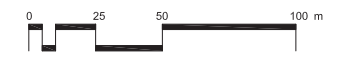
DRAWING NUMBER  
**30371-PL-121B**

## **14/02807/FUL Drawings Plans**



**NOTES:**

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 TOPOGRAPHICAL SURVEY,  
 DRAWING REF:0754\_DGL REV 2,  
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REV	DATE	NOTE	DRAWN	CHECK
C	Aug 2014	Red and blue lines adjusted	FMR	AW
B	July 2014	Planning issue. Road junction as per Vectus' proposals	FMR	AW
A	Mar 2014	Boundaries changed	---	AW
--	--	--	--	--



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FAIRACRE



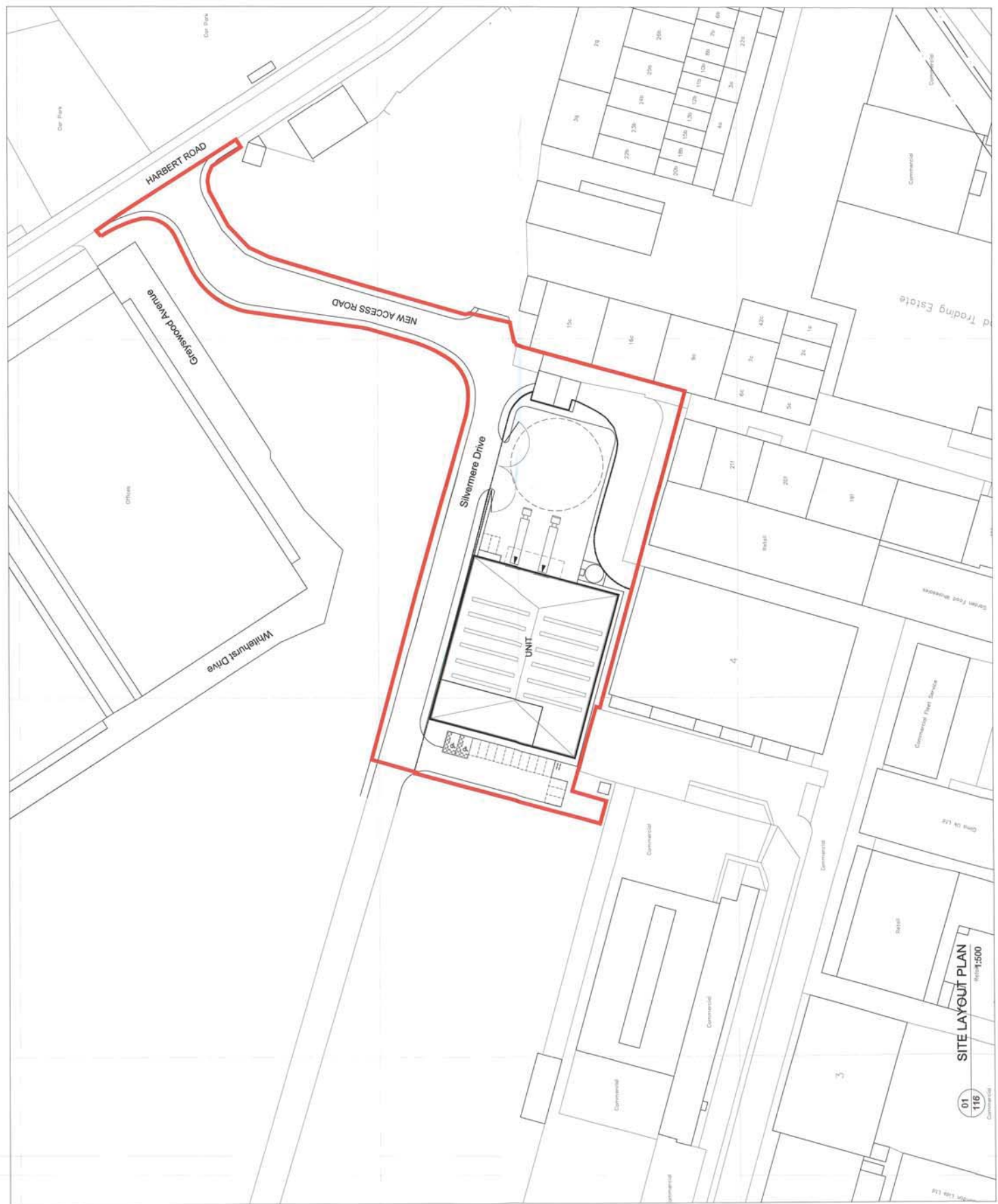
LASALLE INVESTMENT MANAGEMENT

TITLE <b>STONEHILL ESTATE, ENFIELD</b>			
DRAWING <b>THE SILVERMERE SITE SITE LOCATION PLAN</b>			
CLIENT <b>FAIRACRE &amp; LASALLE INVESTMENT MANAGEMENT</b>			
DATE JANUARY 2013	SCALE 1:1000@A1	DRAWN IN	
STATUS PLANNING		CHECKED AW	
DRAWING NUMBER 30371-PL-109 C			

01 SITE LOCATION  
1:1000

**NOTES:**

- SUBJECT TO STATUTORY COMMENTS
- BASED ON INFORMATION PROVIDED BY THE APPLICANT
- DATE: 14/08/2014
- SCALE: 1:500
- PROJECT: THE SILVERMERE SITE
- CLIENT: LASALLE INVESTMENT MANAGEMENT
- DESIGNER: MICHAEL SPARKS ASSOCIATES
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- APPROVED BY: LASALLE INVESTMENT MANAGEMENT



REV	DATE	NOTE	DRAWN	CHECKED
B	22/07/14	Red line as per B-120 A	1901 JM	
A	July 2014	Planning base, Road junction as per 'Notes'	1901 JM	
-	Jan 2014	Final issue	1901 JM	

**MICHAEL SPARKS ASSOCIATES**  
PLANNING ARCHITECTS

**FAIRACRE**  
LASALLE INVESTMENT MANAGEMENT

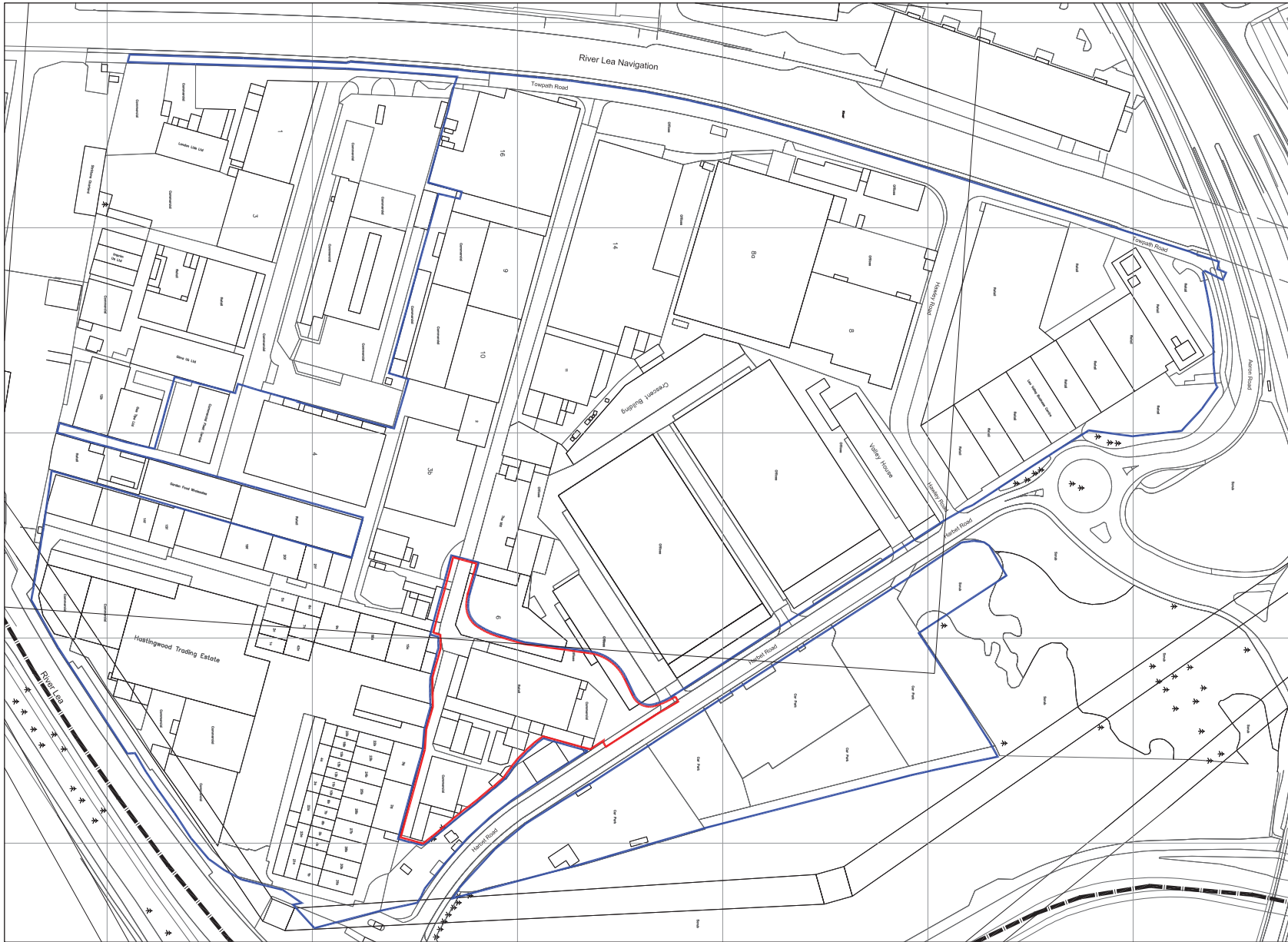
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**TITLE:** STONEHILL ESTATE, ENFIELD  
**DRAWING:** THE SILVERMERE SITE  
**CLIENT:** LASALLE INVESTMENT MANAGEMENT  
**DATE:** JAN 2014  
**SCALE:** 1:500(BA1)  
**DRAWN:** FMR  
**CHECKED:** AW  
**PLANNING:** AW  
**DRAWING NUMBER:** 30371-PL-116 B

**01**  
**116**  
SITE LAYOUT PLAN  
1:500

14/08/2014

## **14/02808/FUL Drawings Plans**



**NOTES:**

SUBJECT TO STATUTORY CONSENTS  
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 DATE: 10.08.12

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REV	DATE	NOTE	DRAWN	CHECK
D	Aug 2014	Red and blue lines adjusted	FMR	AW
C	July 2014	Extent of blue line corrected proposals	FMR	AW
B	July 2014	Planning Issue, Road junction as per Vectos' proposals	FMR	AW
A	Mar 2014	Boundaries changed	--	AW
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**MICHAEL SPARKS ARCHITECTS**

**FAIRACRE**

CHARTERED ARCHITECTS

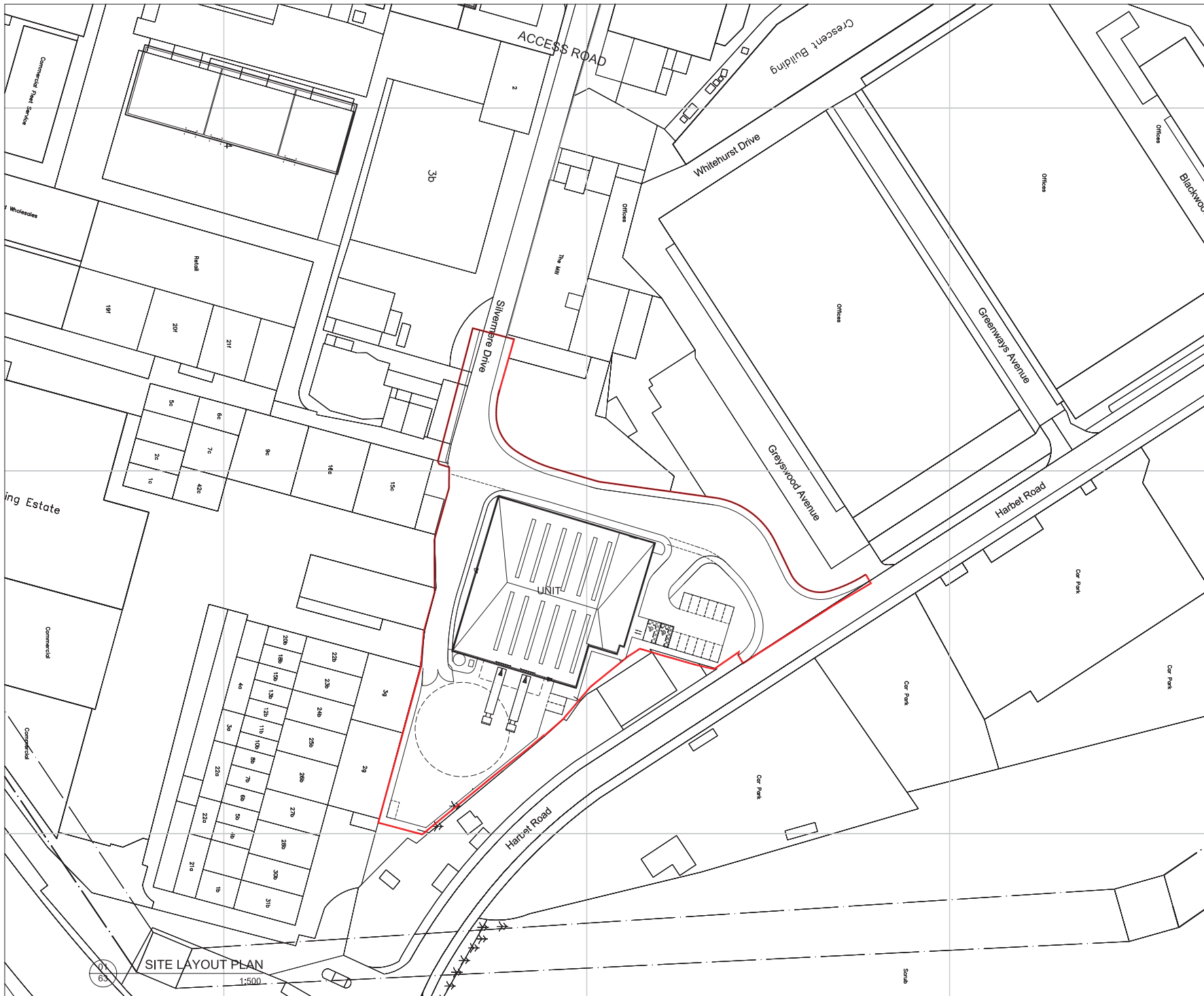
11 PLATO PLACE  
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**LASALLE INVESTMENT MANAGEMENT**

TITLE		STONEHILL ESTATE, ENFIELD	
DRAWING		THE TRIANGLE SITE SITE LOCATION PLAN	
CLIENT		FAIRACRE & LASALLE INVESTMENT MANAGEMENT	
DATE	SCALE	DRAWN	
JANUARY 2013	1:1000@A1	IN	
STATUS		CHECKED	
PLANNING		AW	
DRAWING NUMBER			
30371-PL-108 D			

01 SITE LOCATION  
 01 1:1000





NOTES:

SUBJECT TO STATUTORY CONSENTS

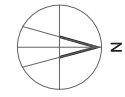
BASED ON GREENHATCH GROUP'S TOPOGRAPHICAL SURVEY DRAWING REF: T34\_DJGL REV. 2, DATED 15/06/12

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0 5 10 20 50 m



REV	DATE	NOTE	DRAWN	CHECK
C	Sep 2014	Boundary edge revised. Building footprint amended to suit	FMR	AW
B	July 2014	Planning Issue. Road junction as per Vector' proposals	FMR	AW
A	18-11-2013	Building enlarged and revised	FMR	AW
-	06-11-2013	First issue	FMR	AW

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FAIRACRE

LASALLE INVESTMENT MANAGEMENT

TITLE <b>STONEHILL ESTATE, ENFIELD</b>		
DRAWING <b>THE TRIANGLE SITE SITE PLAN SHOWING CONTEXT</b>		
CLIENT <b>FAIRACRE &amp; LASALLE INVESTMENT MANAGEMENT</b>		
DATE JAN 2014	SCALE 1:500@A1	DRAWN FMR
	STATUS PLANNING	CHECKED AW
DRAWING NUMBER 30371-PL-110 C		

SITE LAYOUT PLAN  
1:500



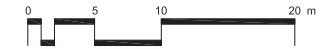
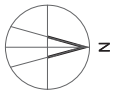
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SUBJECT TO STATUTORY CONSENTS  
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 DRAWING REF: 17384\_DWG\_REV 2,  
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**UNIT AREA SCHEDULE**  
**GROSS INTERNAL AREAS**

1	sqm	sqft
Unit	1,495	16,090
Offices	585	6,300
<b>TOTAL</b>	<b>2,080</b>	<b>22,390</b>

**GROSS EXTERNAL AREAS**

1	sqm	sqft
Ground	1,888	20,325
First Floor	313	3,365
<b>TOTAL</b>	<b>2,201</b>	<b>23,690</b>

PLOT AREA	ha	acres
	0.45	1.12

REV	DATE	NOTE	DRAWN	CHECK
D	Sep 2014	Boundary edge revised. Building footprint amended to site.	FMR	AW
C	July 2014	Planning Issue. Road junction as per Vector proposals	FMR	AW
b	05-02-14	Tunnel indicated	PF	AW
a	18-11-2013	Building enlarged and revised	FMR	AW
-	06-11-2013	First issue	FMR	AW



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TITLE  
**STONEHILL ESTATE, ENFIELD**

DRAWING  
**THE TRIANGLE SITE  
 SITE LAYOUT PLAN**

CLIENT  
**FAIRACRE &  
 LASALLE INVESTMENT MANAGEMENT**

DATE  
 NOV 2013

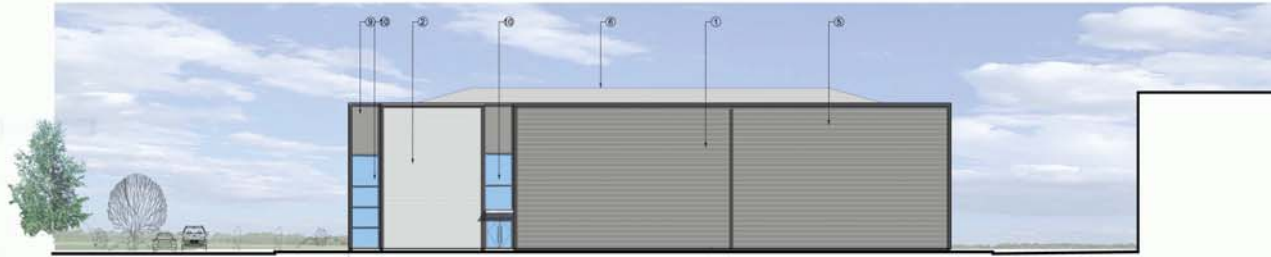
SCALE  
 1:200@A1

DRAWN  
 FMR

STATUS  
 FEASIBILITY

CHECKED  
 AW

DRAWING NUMBER  
**30371-PL-111 D**



01  
70 WEST ELEVATION  
1:200



02  
70 NORTH ELEVATION  
1:200



03  
70 EAST ELEVATION  
1:200



04  
70 SOUTH ELEVATION  
1:200

**NOTES:**

SUBJECT TO STATUTORY COMMENTS  
 BASED ON OPERATIONS GROUP'S  
 TOPOGRAPHICAL SURVEY  
 DRAWING REF: TOSK\_OGA\_REV.3  
 DATED 16.08.12  
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**SCHEDULE OF EXTERNAL FINISH MATERIALS**

**[URF]**

- 1. Profiled Wall Cladding 1 1000 x 32W Horizontally (panel out) profiled steel cladding  
Finish: Tata Coloursol Prima colour: Ocean (dark metallic grey)
- 2. Profiled Wall Cladding 2 1000 x 32W Horizontally (panel out) profiled steel cladding  
Finish: Tata Coloursol Prima colour: Sika (metallic silver)
- 3. Loading Doors Sectional composite loading doors  
Finish: Polyester powder coated colour: RAL 9006 (metallic silver)
- 4. Personnel Doors Steel Finish Polyester powder coated colour: RAL 9006 (metallic silver)
- 5. Joints Top half Vertical Flashing  
Finish to match Tata Coloursol Prima colour: Sika / Zieco
- 6. Roof Profiled steel roof cladding Finish: Tata HPS200 Colour: Merit Grey
- 7. Canopy over Loading Doors Continuous Colour coated fascia channel. Colour: RAL 9006 (Metallic Silver) with roof as (6)

**[OFFICE]**

- 8. Office Cladding 1 1000 x 32W Horizontally (panel out) profiled steel cladding  
Finish: Tata Coloursol Prima colour: Sika (metallic silver)
- 9. Office Cladding 2 F&B: Microfibre composite panels Finish: Tata Coloursol Prima  
Colour: Sika (metallic silver)
- 10. Windows and curtain walling to office Green tinted anti-sun glass to polyester powder coated  
aluminium curtain walling system. Colour: KSLB 03 (metallic grey)  
8006 (metallic silver)
- 11. External Louvers Colour coated aluminium louvers. Colour: RAL 9006
- 12. Canopy over office entrance



4	29.05.14	East and North elevation amended to reflect plans	FMR	AW
	28.05.14	Planning Issue		
REV	DATE	NOTE	DRAWN	CHECK



TITLE <b>STONEHILL ESTATE, ENFIELD</b> DRAWING <b>THE TRIANGLE SITE          ILLUSTRATIVE ELEVATIONS IN COLOUR</b> CLIENT <b>FAIRACRE &amp;          LASALLE INVESTMENT MANAGEMENT</b>		
DATE JAN 2014	SCALE 1:200@A1	DRAWN FMR
STATUS PLANNING	CHECKED AW	
DRAWING NUMBER 30371-PL-113 A		

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21<sup>st</sup> October 2014

## 14/02806/OUT, Stonehill Estate, Silvermere Drive

### Response to the GLA Report of 17<sup>th</sup> September 2014; ref D&P/28flb/01

The purpose of this note is to provide a commentary, from a planning policy perspective, on the GLA's response to the Stonehill planning application Reference 14/02806/OUT.

The GLA's response to the Stonehill application 14/02806/OUT states strong support for the principle of the scheme in strategic terms, subject to compliance with the issues set out in paragraph 67 of the GLA report.

I strongly disagree with the GLA's position, since the proposed scheme clearly contravenes the strategic policies and aspirations of the Mayor's Upper Lee Valley Opportunity Area Planning Framework (2013), the Council's adopted Core Strategy (2010), and the Meridian Water Masterplan (2013). It is noted that both of the latter documents were endorsed by the GLA. Furthermore, the proposed scheme fails to meet the policy requirements of the Proposed Submission Central Leaside Area Action Plan (2014).

The main areas of disagreement and my response are set out below:

#### Strategic planning issues and relevant policies and guidance

##### GLA Report section 11

- The relevant issues and corresponding policies should also refer to 'Opportunity and Intensification Areas', as per Annex 1 of the London Plan.

#### Land use principles

##### GLA Report section 15

- The Report's reference to the '*Enfield Upper Lee Valley Opportunity Area (ULVOA) as identified on London Plan Map 2.4 and Annex One*', is agreed. '*London Plan Policy 2.13 seeks development in opportunity areas to maximise residential and non-residential output and densities and contain a mix of uses as well as support wider regeneration objectives. The London Plan envisages that the ULVOA has capacity for 15,000 new jobs and 20,100 new homes*'.
- This policy support is critical to the coordinated and effective development of Meridian Water as a dense, modern urban quarter that fully capitalises on the opportunities for housing and jobs which this area of London so critically requires, and that the huge investment in the area is making possible.

### GLA Report section 15

- The GLA's reference to the ULVOAPF and Core Strategy as identifying Meridian Water as Enfield's largest regeneration priority area which will deliver up to 5,000 new homes and 3,000 new jobs, is agreed.
- The GLA's view that the '*objectives of these documents are to deliver improved transport connections focussed on Angel Road station and pedestrian and cycle connections with a new bridge, maximise access to the Lee Valley waterways and regional park, regenerate and improve the appearance of the industrial areas and establish a new residential mixed-use neighbourhood, and promote a new grand civic public space along The Causeway connecting the eastern and western parts of the area*', is also agreed.

### GLA Report section 19

- I strongly disagree with the GLA report wording that the ULVOAPF and Core Strategy are '*aspirations*' for the future of Meridian Water. The GLA report should reflect the fact that the future of Meridian Water is set out in **policy**, for example Core Policies 37 and 38 on Central Leaside and Meridian Water.
- The GLA report states that there is a requirement for '*further work and policy formulation*' on these '*long-term aspirations*', and it therefore appears that the GLA has omitted to take account of the Meridian Water Masterplan, or the Proposed Submission Central Leaside AAP, which clearly set out detailed work and policies.
- The GLA report also incorrectly accepts the applicant's timeframe of 20-25 years. In fact, the timeframe for the regeneration of Meridian Water is much shorter than this, with work on the western part of the site at Angel Road station underway by 2017, with regeneration progressing eastwards over the subsequent years.
- It should be noted that the Meridian Water Masterplan, adopted by Enfield Council in 2013, is not merely '*guidance only*', and provides a *material consideration* in planning decisions.
- It is also noted that the GLA response completely fails to mention the Mayor's Housing Zone Prospectus (June 2014), which contains a joint foreword by the Mayor and the Chancellor of the Exchequer. Amongst other things this refers to '*...taking action to make sure all families can get a home of their own...*', '*the need to regenerate whole areas of our cities that are wasted*', '*...put in infrastructure...*', and how Housing Zones are '*...designed to get brownfield sites across London ready for new homes.*' This is not an academic point because page 29 of the Prospectus outlines Meridian Water as a case study, where it is said that the London Borough of Enfield '*will create a new neighbourhood of up to 5,000 homes and deliver up to 3,000 new jobs by 2026*' and that a '*Housing Zone designation could greatly accelerate housing delivery...*'. LBE submitted a bid for Housing Zone funding at the end of June 2014; the first Council in London to do so. So the GLA in its response to the Stonehill application is contextually deficient and this has some importance as the Housing Zone Prospectus and submission clearly indicates that there is a real ambition to accelerate delivery.
- The Causeway route through Meridian Water is a key element of the regeneration of the area. The requirement for the Causeway is established in Core Policy 38, with the route established in the MW Masterplan (2013) and the Proposed Submission Central Leaside AAP (2014). Detailed work on the Causeway considers the feasibility

of the route, for example by taking account of land ownership. Unfortunately the proposed development does not consider the Causeway route as established in Enfield's planning documents, and supported by the ULVOAPF.

- It is simply not true, as the GLA report states, that the proposal ensures that the '*key link across the river can still be delivered*' - the proposal in no way attempts to do this. Through overlaying its proposals without taking account of the route, the application disregards the very considerable and expensive work undertaken by the Council to ensure a feasible Causeway which will enable successful overall delivery of the vital Meridian Water regeneration site.
- With regard to the east bank of the River Lee Navigation the GLA report mistakenly states that through '*some small commercial units and/or the uses that generate the most activity, the proposals go some way to delivering the aspirations of the masterplan.*' I must point out that the GLA view is quite mistaken here, since the proposal in no way commits to small commercial units and therefore it does not support delivery of the MW Masterplan in terms of the quality of environment and type of uses proposed.

#### GLA Report section 20

- At this outline stage, and contrary to the GLA's view, the proposal clearly prejudices the long-term vision of the MW Masterplan and the AAP. This is due to its failure to take account of the Causeway route, the need for higher density and higher value business uses, and the need for housing delivery to the south of the Harbet Road site. It will not be possible at the reserved matters stage to overcome the very significant matters with which I disagree.

#### GLA Report section 21

- It is highly contradictory to read at the beginning of the paragraph that the GLA considers the proposals '*respond to current market demand*' and the policies for industrial land, and then to link this to the strategic perspective as set out by London Plan Policies 2.13 and 2.17 and the ULV OAPF. My view is that the strategic perspective should relate to the long term rather than merely the current market, and takes the strategic view that proposals which affect the future of Meridian Water should always take full account of the policy requirements for 5,000 new homes, 3,000 new jobs and transformational improvements to the infrastructure and environment.

### **Employment**

#### GLA Report section 23

- Whilst the GLA report and the Council are in agreement that the existing industrial estate suffers numerous issues such as poor environmental quality and access roads, the GLA report does not discuss the strategic policies for this site which are established in the London Plan, ULVOAPF, Core Strategy, MW Masterplan and Proposed Submission Central Leaside AAP, and which require environmental and layout improvements that are of a higher quality than those in the application. Furthermore, the proposals fail the crucial requirement to properly integrate the development with the Meridian Water regeneration, and with the existing communities and landscape features.

- This section of the GLA report also makes positive references to job density and landscaping which I strongly disagree with and which will be discussed further, below.

#### GLA Report section 24

- I am very disappointed indeed that the GLA report accepts the applicant's assertions at face value and has a strong set of evidence and arguments that the proposal does not provide the jobs solution which it purports to do.
- The Proposed Submission Central Leaside AAP, through policy CL10, sets out the expectation for part of the Harbet Road Estate (including some of the Stonehill application site) to become an Industrial Business Park (IBP), with employment uses B1a/b/c that are suited to the greatly improved environment at Meridian Water and which do not conflict with the neighbouring residential uses established in the MW Masterplan and AAP.
- A careful reading of the proposal reveals that the jobs figure quoted is based upon the most optimistic, best case scenario assessment in terms of job density and use type, and that calculations using other, equally valid assumptions, would lead to considerably lower estimates. For example, the applicant's total assumes 36% of the floorspace to be B1c, despite not stating the proportion of such a use in the application, and therefore this figure is highly speculative. It is surprising that the GLA missed this point.
- The 'increase' in job numbers is based upon what the applicant describes as 'current estimates' – these estimates are lower than those made by the Council using ONS job figures from the area. Since the existing jobs figures are higher than those stated by the applicant, it is likely that the proposal is significantly inflating the real increase.
- The GLA report refers to 'layout options' – it should be noted that these plans (Drawing no.s 30371-PL-120B and 30371-PL-121B) are illustrative only, and therefore simply offer no real understanding of the final layout of the site. Instead, reference should be made to the Development Parameter Plan (drawing no. 30371-PL-104D), which indicates only the four main sites and road layout, and does not indicate individual unit sizes.
- The GLA should not have endorsed the applicant's attempts to dismiss the MW Masterplan objectives, and Core Strategy and Proposed Submission CLAAP policies, on diversifying the range of business. The policy requirements towards higher value and creative industries are not only essential to meeting the job density requirements for the area, but are entirely consistent with the GLA-agreed strategy of a comprehensive regeneration of the Meridian Water area. As discussed above, the applicant's definition of short and medium term should not be accepted, since the timeframes for Meridian Water regeneration, including at the eastern part of the development, are far less than the 25 year lifespan of the proposed buildings as asserted by the applicant.
- It is particularly surprising that the GLA has apparently accepted the applicant's assertion that the Edmonton Eco Park incinerator will negatively affect the prospects for higher value industry, considering that the GLA has also endorsed the delivery of 5,000 new homes in the surrounding area. The presence of the Eco Park has not prevented the successful siting and operation of the nearby large IKEA store, and the incinerator facility is scheduled for renewal which will lead to an even lower impact. The GLA's response seems to be just plain wrong.



## Urban design

### GLA Report section 26

- The GLA's assertion that '*permeability and legibility through the site is maintained*', since the current estate is difficult to navigate and comprehend, particularly for pedestrians and cyclists, is really very difficult to understand.
- Whilst I can agree with the GLA asserting the desire that '*access to the regional park and the nearby transport interchanges is promoted*', the proposed design does little to meet this requirement, for example failing to take account of the critical Causeway link, not setting out the actual treatment of canal-side/ Towpath Road area, and not providing a design that is amenable for pedestrian and cyclists.
- The GLA report states that the proposal would '*not necessarily compromise on the Council's vision for the alignment of The Causeway*', a statement which, by its own use of the wording of 'not necessarily', effectively concedes that the proposal may very well have a negative impact on the Causeway. In fact, it is clear that the proposal would compromise the alignment of the Causeway, as set out in the ULVOAPF, the MW Masterplan and the Proposed Submission CLAAP, for the reasons already set out under the response to section 19 above.
- It is not clear why the GLA report states that '*by reducing the number of connections to just these two straight and clearly legible routes, pedestrian movement and other commercial activity is concentrated and will help to animate the streets, rather than resulting in stark and inactive roads flanked by swaths of industrial sheds*' - this statement seems to be positively elaborating upon the facts of the application itself. In reality, the proposal is for an industrial development which will consist mostly, and possibly exclusively, of B8 distribution and logistics uses. Such development typically requires large buildings of a size and type which do not in any way lend themselves to active frontages, or streets 'animated' with pedestrians and cyclists. Furthermore, the necessary entrance and exit of heavy goods vehicles (HGVs) throughout the day does not correspond to the requirements of the Proposed Submission CLAAP policy CL1 for a Causeway route which is navigable and safe along its entire length for cyclists and pedestrians.

### GLA Report sections 27-28

- The canal edge is a key asset in the Meridian Water area, and yet the proposal provides little indication of its final treatment. The proposal does not indicate, as the GLA report states, any firm '*intention to landscape this area to provide new public realm*', since the maps showing this are illustrative only (Drawing no.s 30371-PL-120B and 30371-PL-121B).
- Instead, attention must be directed towards the Development Parameter Plan (drawing no. 30371-PL-104D), which shows the canal edge and Towpath Road as a road with vehicular access, presumably including for HGVs, with no specific landscaping or provision for cyclists and pedestrians (note that the arrows denoting vehicular, cyclist and pedestrian movements are merely proposed), as required by Proposed Submission CLAAP policies 8 and 26.
- The GLA report refers to the application's need for '*further clarification*' on the building frontages, and that along Towpath Road opportunities to extend the public

realm around the northern boundary of the site '*should be explored further*'. It is extremely concerning that such essential aspects of the area are liable to not be fully and properly considered at any later stages of the application, and that in this event the Meridian Water regeneration would be severely compromised.

#### GLA Report sections 30

- Whilst the outline application does not contain details of the scale, height and appearance of the units this stage, the two full applications received (14/02807/FUL and 14/02808/FUL) are of a scale and massing which, together with the large building footprints, would be unsympathetic and overbearing within their surroundings.

### **Flooding**

#### GLA Report sections 35

- Given that the development site lies within a flood zone, the design and access statement for the proposal does not make clear any SUDS strategy. The development presents a huge opportunity to integrate elements of SUDS as part of the landscaping, for example designing streets with swales, and planting to create a comprehensive green network that connects to the wider green network of the Lee Valley Regional Park.

### **Climate change mitigation and adaptation**

#### GLA Report section 41

- My view is that the LVHN pipe network will be nearby and that any heat demand would be beneficial to LVHN, while reducing the carbon footprint of the building. It is feasible to connect, and this would save carbon dioxide emissions, improving the environmental sustainability of the proposed scheme. It would also benefit the scheme since the development will not need to provide its own boiler plant and plant room space, gas supply, Clean Air Act compliant flues, and the operation and maintenance of the plant. The proposal would therefore be contrary to policies DMD 52 and CL30. The LVHN was, it should be noted, recently launched at an event held at the GLA.

### **Transport for London**

#### GLA Report section 45

- As the TfL comments make clear, '*the Causeway, Angel Square and Angel Bridge are important elements of the masterplan seeking to improve pedestrian and cycle links and bus connectivity to support the regeneration envisaged.*'
- The proposal however, through failing to take account of the Causeway, or of the need for suitable and high quality pedestrian and cycle routes through the area, will

simply not meet the policy requirements for access to the improved Angel Road railway station, improved access to the Lee Valley Regional Park, access throughout the Meridian Water area, and connections beyond to existing communities.

## **Conclusion**

### GLA Report section 67

- For the reasons discussed above, I cannot, in planning policy terms, agree with the GLA's conclusions on the principle of development, employment and urban design.
- Furthermore, I consider that the residential elements of the MW Masterplan and Proposed Submission AAP, which show housing to the south of the Harbet Road site and across the River Lee Navigation to the west, should also form part of the GLA Report assessment. This is particularly the case given the acute requirement for housing delivery established in the FALP, and the status of Meridian Water as a key location for housing delivery as established in policy, and other, documents.

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