

21st October 2014

14/02806/OUT, Stonehill Estate, Silvermere Drive

Response to the GLA Report of 17th 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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