

# LONDON BOROUGH OF ENFIELD

## PLANNING COMMITTEE

Date : 19 December 2017

**Report of**  
Assistant Director,  
Regeneration & Planning

**Contact Officer:**  
Andy Higham  
David Gittens  
Ms Claire Williams  
Tel No: 02083794372

**Ward:**  
Southbury

**Ref:** 17/00986/FUL

**Category:** Full Application

**LOCATION:** Unit 5 Martinbridge Industrial Estate , 240-242 Lincoln Road, Enfield, EN1 1SP

**PROPOSAL:** Subdivision of existing self-storage unit with ancillary offices (Class B8) into 3 units involving demolition of 2-storey office block to south elevation, part retention of Class B8 use, part change of use from Class B8 to a mixed commercial use (Class B8/A1), construction of mezzanines to 2 units, partial increase in height of building, including entrance way to south elevation, associated building alterations, reconfigured car park and revised servicing arrangements.

**Applicant Name & Address:**  
Travis Perkins (Properties) Ltd And Tesco  
Pension Trust...  
C/O Agent

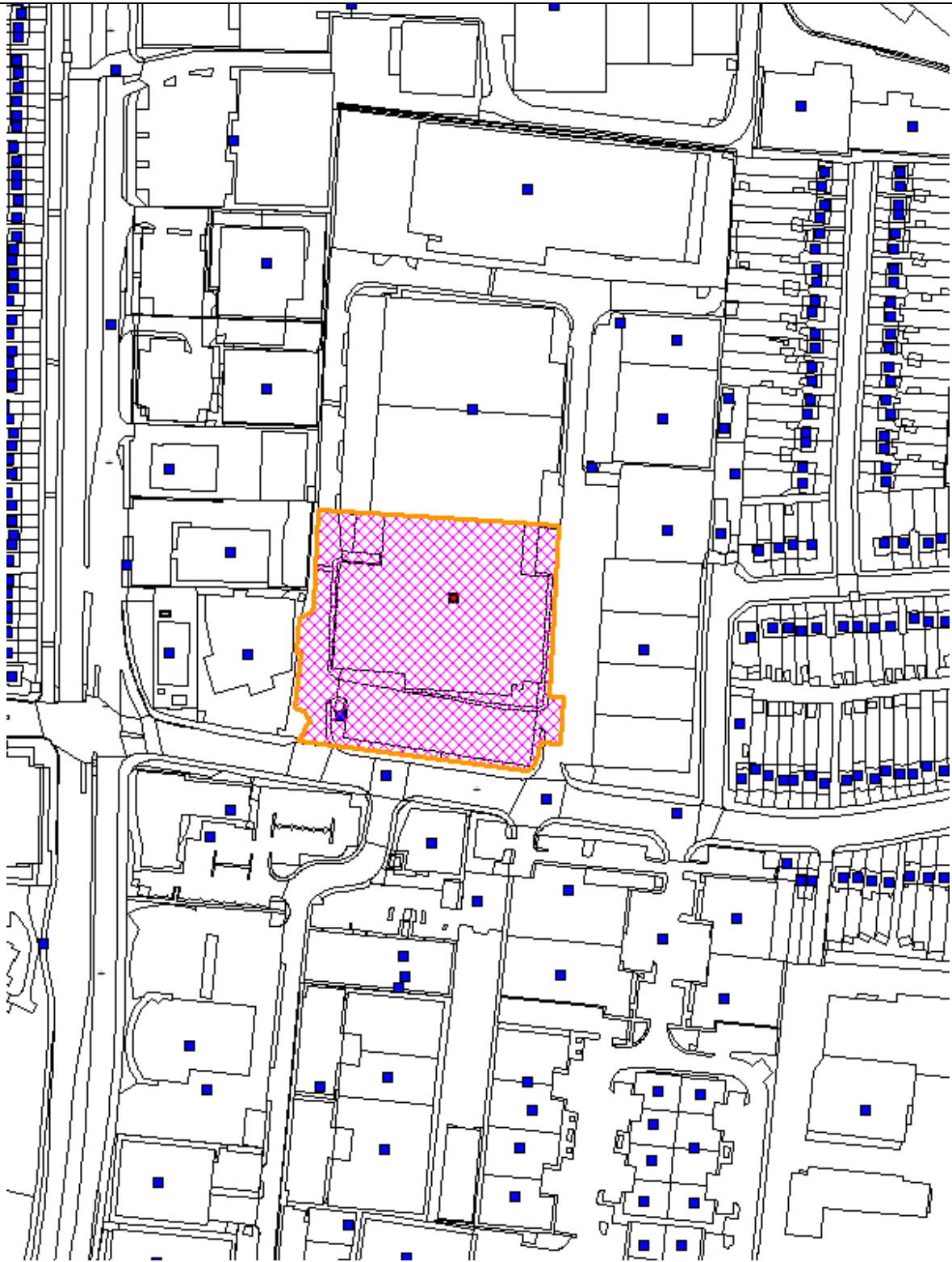
**Agent Name & Address:**  
Mr Tim Rainbird  
Ingeni Building  
17 Broadwick Street  
London  
W1F 0AX

**RECOMMENDATION:** That planning permission be **REFUSED**.

**Note for Members:**

Applications of this nature would normally be considered under delegated authority but the application has been brought to the Planning Committee due to the planning issues raised.

Ref: 17/00986/FUL LOCATION: Unit 5 Martinbridge Industrial Estate , 240-242 Lincoln Road, EN11 1



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Scale 1:2500

North



## **1.0 Site and Surroundings**

- 1.1 The application site is a square plot that measures approximately 1.05 hectares. The site comprises a B8 storage unit with ancillary B1 (office) uses occupied by Big and Red Storage, a self-storage company. The building sits to the north of the site and a two storey extension has been implemented to the south for office use. To the east and west of the building are service areas. The total floor space of the building measures approximately 9,950sqm. There is hardstanding that provides parking for cars within the front of the site. There is also a substation close to the front boundary on the western side of the site.
- 1.2 The site lies to the east of the Great Cambridge Road and is accessed from Lincoln Road. The site is bounded by warehouses and ancillary offices to the north, access roads to the east and west and Lincoln Road to the south. The immediate area consists of large generally two storey warehouse buildings. The site is located within the Great Cambridge Road and Martinbridge Industrial Estate which is designated as Strategic Industrial Land (SIL). More specifically, the site has been defined as an Industrial Business Park (IBP). The site is also located within flood zone 1. The site is not located within a Conservation Area and the site does not comprise any listed buildings.

## **2.0 Proposal**

- 2.1 Planning permission is sought for the subdivision of the existing self-storage unit with ancillary offices (Class B8) into 3 units involving demolition of the two storey office block to the south elevation, part retention of Class B8 use, part change of use from Class B8 to a mixed commercial use (Class B8/A1), construction of mezzanines to 2 units, partial increase in height of building, including entrance way to south elevation, associated building alterations, reconfigured car park and revised servicing arrangements.
- 2.2 The building would increase in height to the south by 0.5 – 2 metres and the roof form would change from a pitched roof to a flat roof. With the removal of the two storey extension to the south, the depth of the building would be reduced by 6.3 metres. The proposed two storey front projection with a flat roof serving unit 1 would measure approximately 12.7 metres wide, 10 metres high and 1.8 metres deep. The projection would be set approximately 0.8 metres higher than the new roof to the south of the building.
- 2.3 The proposed floor space and use class of the new units is set out below. Unit 1, the largest unit would be located to the southern portion of the building and is proposed to be occupied by Wickes. Unit 3 would be occupied by the existing occupier. The occupier of unit 2 has not been specified.

Unit	Original Floor Space Proposed (sqm)	Total Floor Space Proposed with Additional Mezzanine Floor Area (sqm)	Use Class
1	3,371sqm (2,906sqm & a mezzanine area of 465sqm)	3,416sqm	B8/ A1
2	1,484sqm (1,006sqm & a mezzanine area of 478sqm)	1,915sqm	B8
3	1,285sqm (No mezzanine)	2,250sqm	B8

**Table 1:** Proposed Floor Space (Sqm) and Use Class

- 2.4 The building to the south and partially to the west and east elevations would be re-clad with horizontal composite cladding finished in midnight blue and vertical profiled built up cladding system finished in merlin grey. The rest of the building would be re clad in vertical profiled built up cladding system in midnight blue and merlin grey. The roof of unit 1 and 2 would be re-clad and new roof lights installed. Roller shutter doors are proposed to the north and south elevations of the building.
- 2.5 The secure storage and service area to the front of the site would be enclosed with a 4m high security fence and gates. The remainder of the boundaries of the site to the front which are currently enclosed with palisade fencing would be enclosed with 0.6m high timber knee rails.
- 2.6 The service access will remain as existing however the vehicular access from Lincoln Road would be modified to include the alteration of the radii for the kerbs. Service access would only be gained from the west. The car park would be rearranged and would provide a total of 51 parking spaces (including 11 van, 2 car and trailer spaces and 3 disabled designated spaces). A total of 18 cycle spaces, 8 of which will be covered by a shelter.
- 2.7 The application form states that there are three existing employees and the proposal would provide 63 full time members of staff. In terms of opening times the application form states that the opening times would be Monday to Sunday 6am to 10pm.
- 2.8 Amended drawings have been provided that include the following:
- Second pedestrian access onto Lincoln Road introduced to the east of the site
  - Removal of staff car parking spaces from the service yard
  - Reconfiguration of the long and short stay cycle parking
  - Additional landscaping introduced to the south west corner
  - Additional mezzanine floorspace introduced.
  - Flashings on the corner of the two storey front projection

- 2.9 The agent requested that the proposal description be amended so that unit 1 falls within the sui generis class as a builders merchants rather than an A1/ B8 use class. The proposal description has not been amended as it is considered that a Wickes store is not a builders merchant and that A1/ B8 better describes the proposed use of the unit.

### **3.0 Relevant Planning History**

- 3.1 P13-01309PLA - Change of use from warehouse/distribution centre/vehicle preparation and servicing (B2) to warehouse (B8) and offices (B1) in 3 separate suites (RETROSPECTIVE). – Approved 4 July 2013
- 3.2 TP/10/0995 – Change of use from warehouse/distribution centre (B2) to warehouse (B8) and offices (B1) RETROSPECTIVE. - Withdrawn 17.08.2011
- 3.3 TP/06/1690 - Change of use from warehouse (Class B8) to warehouse / distribution centre / vehicle preparation and servicing (Class B2), involving erection of a security hut and customer lounge. – Approved 14 November 2006

### **4.0 Consultation**

#### **4.1 Public:**

Letters were sent to 18 adjoining and nearby residents, a site notice was posted and a press notice was published in the Enfield Independent. No responses were received.

#### **4.2 Internal and External Consultees:**

- 4.2.1 Planning Policy: Objection. The proposal would be harmful, as the proposed A1 retail use would be at odds with the Great Cambridge Road and Martinbridge Estate SIL and IBP designation.
- 4.2.2 Traffic and Transportation: Objection based on the lack of information on the trip generation and impacts, unacceptable parking layout and the lack of acceptable levels of parking proposed. The scheme would be an overdevelopment of the site where the required level of parking cannot be wholly and safely accommodated within the boundaries of the development leading to problems of over spilling parking and potential delays to traffic on Lincoln road especially from vehicles waiting to turn right in to the site.
- 4.2.3 Greater London Authority (GLA): Objection as the principle of the change of use of part of the warehouse to a Class B8/ A1 use is unacceptable and contrary to London Plan Policies 2.17 and 4.4 and would threaten the long term industrial capacity of the wider SIL.
- 4.2.4 Environmental Health: No objection subject to the attachment of a Construction Management Plan condition that includes details of how dust and emissions would be managed.

4.2.5 Tree Officer: No objection.

4.2.6 Urban Design Officer:

- The introduction of smaller unit size for the cladding panels around the entrance would be of benefit as it would bring some added visual interest to the building around the main entrance.
- A dedicated route through the site would be of benefit rather than expecting pedestrians to cross through the car park.

4.2.7 SuDS Officer:

The proposal does not take into account surface water floor risk and a Sustainable Drainage Strategy has not been submitted that accords with policy requirements. The current drainage approach is unacceptable due to the following:

- Not clear whether the paving would be permeable.
- Proposed extension does not incorporate a green, blue or brown roof.
- Rain gardens are not proposed.

4.2.8 Commercial Waste: No waste plans have been submitted.

4.2.9 Thames Water: No objection.

4.2.10 Design out Crime Officer: No objection conditions suggested.

4.2.11 London and Fire Emergency Planning Authority: Satisfied with the proposals but recommends that sprinklers are considered.

4.2.12 Transport for London (TfL): Raised concerns with the proposed layout of the servicing area and the potential to create congestion. Stated that the applicant must be required to adopt a booking system so that no vehicles have to wait on the highway to access.

## **5.0 Relevant Planning Policies**

5.1 London Plan (2016)

Policy 2.6 – Outer London: vision and strategy

Policy 2.7 – Outer London: economy

Policy 2.8 – Outer London: transport

Policy 2.17 – Strategic Industrial Locations

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 4.7 – Retail and town centre development

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 5.9 – Overheating and cooling  
Policy 5.10 – Urban greening  
Policy 5.11 – Green roofs and development site environs  
Policy 5.12 Flood Risk Management  
Policy 6.3 - Assessing Effects of Development on Transport Capacity  
Policy 6.13 – Parking  
Policy 7.1 – Building London’s neighbourhoods 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 7.15 – Reducing noise and enhancing soundscapes  
Policy 7.18 – Protecting local open space and addressing local deficiency  
Policy 7.19 – Biodiversity and access to nature

## 5.2 Core Strategy (2010)

Core Policy 13 Promoting Economic Prosperity  
Core Policy 14 Safeguarding Strategic Industrial Locations  
Core Policy 15: Locally significant industrial sites  
Core Policy 16: Taking part in economic success and improving skills  
Core Policy 18: Delivering shopping provision across Enfield  
Core Policy 20: Sustainable energy use and energy infrastructure  
Core Policy 24 The Road Network  
Core Policy 28 Managing Flood Risk through Development  
Core Policy 29: Flood management infrastructure  
Core Policy 30 Maintaining and Improving the Quality of the Built and Open Environment  
Core Policy 32: Pollution  
Core Policy 36: Biodiversity  
Core Policy 40: North East Enfield  
Core Policy 46: Infrastructure contributions

## 5.3 Development Management Document (2014)

DMD19 Strategic Industrial Locations  
DMD21 Complementary and Supporting Uses within SIL and LSIS  
DMD23 New Employment Development  
DMD25: Locations for New Retail, Leisure and Office Development  
DMD37 Achieving High Quality and Design-Led Development  
DMD45 Parking Standards and Layout  
DMD46 Vehicle crossovers and dropped kerbs  
DMD47 Access, New Roads and Servicing

DMD53: Low and Zero Carbon Technology  
DMD54: Allowable Solutions  
DMD55: Use of Roof space/ Vertical Surfaces  
DMD56: Heating and Cooling  
DMD57: Responsible Sourcing of Materials, Waste Minimisation and Green Procurement  
DMD58: Water Efficiency  
DMD59: Avoiding and Reducing Flood Risk  
DMD61: Managing Surface Water  
DMD68: Noise  
DMD69: Light Pollution  
DMD79: Ecological Enhancements  
DMD80: Trees on development sites  
DMD81: Landscaping

#### 5.4 Other Policy

National Planning Policy Framework 2012 (NPPF)  
National Planning Practice Guidance 2016 (NPPG)  
London Plan 2016  
Enfield Core Strategy 2010  
Enfield Development Management Document 2014  
North East Enfield Area Action Plan 2016  
Section 106 Supplementary Planning Document 2016 (s106 SPD)  
Enfield Employment Land Review (2012)

#### 6.0 Analysis

6.1 This report sets out an analysis of the issues that arise from the proposals in the light of adopted strategic and local planning policies. The main issues are considered as follows:

- Principle of development and land use
- Traffic and transport
- Design and appearance
- Flood Risk
- Sustainability

##### Principle of Development

6.2 The site is located within the Great Cambridge Road and Martinbridge Industrial Estate which is designated as Strategic Industrial Land (SIL) and more specifically, the site has been defined as an Industrial Business Park (IBP).

6.3 Policy 2.17 of the London Plan sets out that Boroughs should manage and where appropriate, protect the SILs designated within the Plan as London's main reservoirs of industrial and related capacity. Policy 2.17 sets out that IBP's are particularly suitable for activities that need better quality surroundings including



research and development (Use Class B1b), light industrial (Use Class B1c) and higher value general industrial (Use Class B2) some waste management, utility and transport functions, wholesale markets and small scale distribution.

6.4 Policy 6.2 of the North East Enfield Area Action Plan (NEEAAP) identifies the Great Cambridge Road and Martinbridge Estate SIL as being Enfield's largest employment area outside of the Lee Valley Opportunity Area Planning Framework boundary and the only estate within NEEAAP designated as an Industrial Business Park (IBP). It sets out that proposals falling within the IBP will need to demonstrate compliance with the relevant London Plan and Enfield's Local Plan policies. Part B of the policy states that redevelopment of existing buildings is required to support the Estates role as an Industrial Business Park by:

- *Encouraging high quality employment uses that fit with its role as an Industrial Business Park (IBP); and*
- *Ensuring that any trade counter uses supports the overall function and quality of the IBP.*

6.5 SIL designated areas are protected through Policy CP14 of the Core Strategy and Policy DMD19. These policies seek to resist changes of use outside of industrial uses (use classes B1, B2 and B8) in order to retain, preserve and enhance the industrial function of the area and consequently maintain an adequate mix of employment uses. The proposed change of use of unit 1, which is the largest unit of the three units, from a B8 use to an A1/ B8 use would not fall into any of the appropriate developments within SIL set out in strategic and local planning policies. It is of the view of both the GLA and the LPA that the introduction of a retail use on the site within a designated SIL would set an unacceptable precedent that would further erode the capacity of the SIL to accommodate appropriate industrial and related uses.

6.6 Policy DMD19 states that a change of use from industrial uses in the Great Cambridge Road Industrial Business Park will be refused, unless the criteria set out below is met.

- *The proposed use would not compromise: the function and operation of the industrial area as a whole, the operating conditions of the other remaining industrial uses, or the potential future use of neighbouring sites for appropriate industrial uses;*
- *The proposed use does not have a significant adverse impact on surrounding residents in terms of pollution, noise and traffic;*
- *There is no significant net loss of industrial capacity;*
- *The proposed use generates significant additional employment;*
- *The proposed development makes a significant contribution to the public realm*

6.7 In terms of the elements of Policy DMD19 underlined above the proposal would not accord with these policy requirements.

- 6.8 The application seeks planning permission for a change of use from Class B8 to a mixed commercial use (Class B8/ A1). The submitted Economic Development Assessment states that Wickes Building Supplies Limited sell building products to the trade and visiting members of the public. The document goes on to state that Wickes concentrate at the 'heavy end' of the DIY sector and appeal in particular to the serious DIY enthusiast and local tradesmen and builders. Typically, more than 40% of a store's turnover will be derived from local tradesmen or builders, and this figure is increasing with recent research by Wickes Building Supplies suggesting more than 50% of a Wickes Building Supplies store derives its sales from the trade.
- 6.9 The Economic Development Assessment includes reference to a UK DIY and Gardening March 2010 report produced by the analysts, Verdict which suggested that an estimated 60% of Wickes store sales are from DIY/non-trade retail. Evidence has also been provided that suggests that 60% of Wickes stores turnover is generated from trade with the remaining 40% comprising of DIY retail. However this was based on an independent survey that was undertaken by Marketing Sciences from only two Wickes stores located in close proximity to each other in November 2011. The survey found that of the 1,498 people surveyed, 54% of trips were for trade purposes and 46% were for retail and 61% of the branch turnover was from trade sources.
- 6.10 An updated customer survey was undertaken in July 2017 at two Wickes Building Supplies' branches and this information was submitted to the LPA. The branches opened within the last 2 to 3 years and represent the current business model. The adopted methodology of the July 2017 surveys reflected those of the November 2011 survey; the survey was undertaken throughout an entire 7 day week to reflect the full opening hours, and involved interviewing nearly 1,400 visiting customers at the two sites.
- 6.11 "Trade" respondents were tradesmen, house builder, property developer or landlords and respondents who answered DIYer, or shopping for someone else where classified as "retail". The survey found that 51% of trips to the two branches were for either trade customers or for trade related purposes. The total spend within the two branches, accounted for nearly 60% for trade customers / trade related purchases and just over 40% of the total spend was from DIY customers. Although more up to date surveys have been provided the submitted evidence remains insufficient to allow a deviation from strategic and local planning policies.
- 6.12 It is considered that DIY/ non-trade retail is a dominant use within the Wickes B8/A1 quasi-employment land use designation and that an assumption can be made that over 10% of the overall floorspace of the unit will have a DIY/non-trade retail element. This would fail to accord with Policy DMD21 which states that proposals involving an element of direct sales will generally be accepted, provided that the retail element does not become the dominant use and is no more than 10% of the overall floorspace of the unit and the retail element is on the ground floor.

- 6.13 As set out in paragraph 6.4.2 of the DMD the Council recognises the changing nature of industrial/ business activities and accepts in some instances that industrial type uses in industrial areas may include an element of direct sales in the form of trade counters which are ancillary to the main use unit. These uses are considered acceptable provided that the retail element does not become the predominant use. Proposals that include retail use which forms a significant part of the activity will be contrary to the policies set out in Chapter 7 'Town Centres and Shopping' of this document and will therefore be refused. This scheme would not accord with these policy requirements.
- 6.14 The planning application was originally submitted as a mixed commercial use (A1/ B8) for unit 1 and not a sui generis use class. To support the proposed mixed use an appeal decision relating to a new Wickes Building Supplies proposal in the London Borough of Sutton was submitted with the application which sets out that the definition of Wickes Building Supplies' operation as a mixed B8/A1 use was supported by the Inspector. Whilst the Inspector noted that the Wickes Building Supplies operation did evidently include a retail element, he determined that a *"planning unit may have more than one primary use and in that event it is perfectly legitimate to treat it as having a mixed-use"*, i.e. Class B8/A1. The Inspector noted that if the Class B8 (trade) element of the proposed Wickes was to cease entirely, or if the retail component were to predominate then *"the question of whether a material change of use had taken place could legitimately be assessed"*. Although the Inspector in this particular case agreed that Wickes falls within an A1/ B8 use, that does not mean that the mix of uses on this site is acceptable. It is acknowledged that the appeal was allowed and the site was SIL however the site circumstances were different to that of the subject scheme due to the points set out below.
- The site had previous approval for a Travis Perkins trade supply use
  - The site was considered 'unsuitable' for industrial uses listed at paragraph 2.79 of the London Plan, because of proximity to residential areas and other site specific characteristics
  - It was located on the edge of SIL
  - It was vacant/unused
- 6.15 The agent requested a change to the proposal description. The proposed Class A1 retail use was put forward to be removed from the description of development on the basis that the split of retail and trade sales (A1/B8 use) does not apply to floorspace, but rather the composition of sales from the planning unit. On the basis that A1 and B8 elements are not distinguishable in floorspace terms, like builders' merchants, the applicant/ agent felt that the proposed sui generis – builders merchants use is a more accurate and appropriate means of defining the use.
- 6.16 The proposal is not considered to be a builder's merchant due to the extent of non-trade that Wickes stores comprise. Travis Perkins for instance is a timber and builder's merchants that supplies products to trade professional and builders. Changing the proposal description to sui generis – builders merchants would not remove the retail element of the proposal and would result in the same analysis of the scheme being applied.

6.17 Other planning applications and planning permissions that have been submitted for Wickes stores across the country have been reviewed and there were no examples of sui generis – builders merchant schemes that had been submitted to any LPA. The planning applications found are either use class A1 or a mixed commercial Class B8/ A1 use.

- Planning permission (ref. no. CR/2016/0176/FUL) was granted for the construction of one commercial mixed use building (Class B8/ A1) to be occupied by Wickes on 20 July 2016 in Crawley.
- Planning permission was sought from Rochdale Metropolitan Borough Council for the part demolition of the former B&Q unit and subdivision to create two retail units (Use Class A1) to be occupied by Wickes and B&M Home store.
- Planning permission was sought for the refurbishment and change of use of existing building for a mixed use (Class B8/A1) together with first floor amenity space, trading mezzanine, revised parking and servicing arrangements and associated works from Epping Forest.
- Planning permission (ref. no. DC/16/1634/FUL) was sought for the construction of one retail warehouse (Class A1) on 16 August 2016 from Forest Heath District Council.

6.18 In terms of job creation, the supporting information states that there would be an increase in the number of employees from 3 to 63. The proposal would also generate jobs during the construction stage as well as ongoing maintenance such as site security and cleaning. It is acknowledged that the proposal would contribute to the local economy and create new jobs however this is not sufficient justification for the introduction of a non-industrial use into what is a good quality, fully functioning SIL which benefits from excellent transport connections particularly suited to the needs of modern industrial occupiers. Of particular concern is the likely impact of the scheme on the long-term viability of the SIL. The GLA noted that a large portion of the SIL to the north has already been encroached upon by a retail park and by allowing retail uses within the SIL this is likely to set an unacceptable precedent which would further reduce the industrial capacity of the SIL in a borough which has been identified for increased industrial capacity. The unit has also not been actively marketed for Class B8 use or any other alternative industrial use befitting the SIL designation.

6.19 The GLA also have concerns over the viability of the two remaining B8 units. As the Wickes store will take up the vast majority of the footprint of the existing warehouse, the two remaining warehouse units will be very limited in size. Furthermore only one unit will have access to forecourt parking and neither will benefit from a dedicated loading area. These factors will significantly limit their attractiveness to prospective tenants and therefore, their viability in the longer term.

6.20 The Council's Employment Land Review (2012) found that the supply of land in North London is limited and there is a need to retain industrial capacity to accommodate existing and future demand. The site needs to be safeguarded and available for suitable businesses wishing to expand/locate in the borough. IBPs

are distinct from Preferred Industrial Locations (PILs) due to the fact that they meet the business needs of enterprises that need better quality surroundings including Research and Development B1 (b), light industry B1(c) and higher value added general B2 activities. They also require significantly less heavy goods access and are able to relate more harmoniously with neighbouring uses than those in PILs. Policy safeguards the IBP designation for enterprises that require these higher quality industrial conditions, especially since the estate is the only allocated IBP in Enfield.

- 6.21 The Employment Land Review recognises the estates significance by saying that it is the borough's main employment area away from the Lee Valley, whilst the London Plan lists the estate as one of thirteen IBP locations in the whole region. This emphasises that the estate plays a significant role for Enfield, London and the wider South East region. If the Council were to approve this application it would establish a precedent for similar non-policy compliant uses in the future. As a result, this would result in further significant loss of industrial capacity and threaten the legitimacy of the IBP designation.
- 6.22 During the period of 2011-2026, the Employment Land Review of 2012 indicates there should be no net loss of industrial land in Enfield. An increase in demand for warehousing land offsets a loss in traditional production space. As such, it is essential that the Great Cambridge Road and Martinbridge Trading Estate is retained for industrial use and that there is no loss of industrial activity, especially since the study notes that the estate is the Borough's main employment area away from the Lee Valley, extending to 40ha.
- 6.23 In regards to industrial land borough-wide, the net absorption of industrial floor space has been generally positive from 2009 to 2016 at 23,200 sqm. From a property perspective, vacancy among industrial premises is low at 4.7% (lower than levels judged suitable to facilitate optimal operation of the market), vacant land churn is strong and rental values are buoyant which points towards supply being in a healthy state.
- 6.24 The GLA has recently published the Industrial Land Demand Study (June 2017). The study found that London's stock of industrial land has continued to diminish and has done so at well above the London Plan benchmark rates. Given the considerable tightening of the industrial land market across the whole of London, the report advises that significant further industrial land release must be restricted. It has been recommended that most boroughs retain their existing industrial land. More specifically, Table 15.1 identifies Enfield requiring further industrial capacity. The report estimates that the borough has an estimated baseline net demand for industrial land of 41.7 hectares.
- 6.25 Meridian Water is the largest regeneration priority area in the borough to deliver jobs and houses. The Proposed Submission Edmonton Leaside AAP (January 2017) removes the SIL designation from the Harbet Road Industrial Estate (Policy EL2). In response to the consultation of the Proposed Submission ELAAP the GLA stated that such a large scale loss of SIL cannot be supported until there is full consideration of the potential SIL/ industrial land reconfigured across the whole of the Upper Lee Valley. In addition the GLA stated that the approach to

the quantum of SIL and LSIS release and reconfiguration as detailed in Policy EL14 of the ELAAP is not currently in general conformity with the London Plan.

- 6.26 The proposed loss of industrial floor space as a result of the proposed change of use to A1/ B8 uses fails to accord with both local and strategic policy. There is an objection in principle to the loss of industrial land and this is supported by the GLA. There is also no sufficient justification to outweigh the clear and strong policy position regarding the safeguarding of strategic industrial land over the longer term. This is an important consideration and needs to be given significant weight given the need to retain remaining industrial land to support local employment, if planned regeneration is to be supported elsewhere in the Borough particularly at Meridian Water.
- 6.27 The proposal would be contrary to Policy CP14 of the Core Strategy, Policies DMD19 and DMD21 of the Development Management Document, Policy 6.2 of the North East Enfield Area Action Plan, the Employment Land Review and Policy 2.17 of the London Plan, as well as the aims and objectives outlined within the National Planning Policy Framework.
- 6.28 The impact the scheme would have on the surrounding residents in terms of pollution, noise and traffic is assessed later in this report.

#### Impact on Town Centres

- 6.29 Policy DMD25 of the DMD states that new retail development will be permitted within Enfield Town and the borough's four district centres. In accordance with the sequential test if no sites are suitable or available within the town centres for the development proposed, then retail development at edge of centre locations that are accessible and well connected to and up to 300 metres from the primary shopping area will be permitted.
- 6.30 The NPPF seeks to promote the vitality and viability of town centres, recognising that town centres are at the heart of communities. This policy is in accordance with the NPPF which advocates a sequential approach requiring sites within town centres to be explored first where suitable sites or buildings for conversion are available, followed by edge of centre sites, and only then out of centre sites. A town centre first policy is essential to ensure the future vitality and viability of Enfield's centres. The decline of the high street can be attributed to reasons including the rise of online retail, increased out of town shopping and supermarket product offer, and the recession. This town centre first policy seeks to combat decline of the high street.
- 6.31 The submitted retail impact assessment states that the proposed building will not have a significant adverse impact on in centre investment or Enfield's vitality and viability. It also states that the 'need' for an additional DIY store was identified in a Council study, which demonstrates that capacity exists to support another store such as that proposed. However, the scope only extends to vacant units in Enfield Town and Edmonton Green. Policy DMD25 states that sites will need to be explored within Enfield Town and the four district centres. The proposal does

not demonstrate that the sequential test has been applied extensively and is in line with Policy DMD25 and therefore fails to accord with policy requirements.

#### Impact on Street Scene and Character

- 6.32 Policy CP30 of the Core Strategy requires new development to be of a high quality design and in keeping with the character of the surrounding area. Policy DMD37 sets out criteria for achieving high quality and design led development. The immediate area consists of large generally two storey warehouse buildings.
- 6.33 The increase in height and the changes to the building would not result in any undue harm to the visual amenity within the street scene. Amended drawings have been received that increases the amount of soft landscaping on the site to help soften and screen the proposed security fencing, improves pedestrian access to the site and introduces flashings on the corner of the building to add more visual interest to the front entrance of the building. Further details of the external materials to be used and also the layout of the parking area to improve access for pedestrians to the store would be required.

#### Traffic and Transportation

- 6.34 The London Plan, Core Strategy and DMD encourage and advocate sustainable modes of travel and require that each development should be assessed on its respective merits and requirements, in terms of the level of parking spaces to be provided for example.
- 6.35 Policy DMD45 requires parking to be incorporated into schemes having regard to the parking standards of the London Plan; the scale and nature of the development; the public transport accessibility (PTAL) of the site; existing parking pressures in the locality; and accessibility to local amenities and the needs of the future occupants of the developments.
- 6.36 The car park would be rearranged and would provide a total of 51 parking spaces (including 11 van, 2 car and trailer spaces and 3 disabled designated spaces). A total of 18 cycle spaces will be provided, 8 of which will be covered by a shelter.
- 6.37 In terms of cycle spaces, 14 long stay and 14 short stay spaces would be required to comply with the London Plan. The long-stay cycle parking should be provided in a safe, secure location within the building along with shower and changing facilities for employees.
- 6.38 The London Plan states that the maximum standards for non-food retail space is 50 – 30 within a PTAL of 4 to 2. B8 floor space is also proposed. The GLA raised no objection to the proposed number of car parking spaces including the number of disabled spaces and active and passive electric charging points. However the GLA advised that an additional 4% of the spaces should be enlarged so that they could be adapted to be disabled spaces in the future.

- 6.39 The Traffic and Transportation department were consulted on the proposal and raised concerns with the level of parking provision proposed for the development including the lack of adequate parking to accommodate the B8 uses and the trade/DIY customers for the retail element of the proposed Wickes. T&T stated that the parking accumulation and trip generation elements of the study makes reference to three other Wickes sites (Huntingdon, Folkestone and Christchurch) which are of similar size and location, however no background information on the floor area, number of parking spaces and the uses of the site (i.e. whether it is a Trade/DIY store) etc. has been included and there is therefore no way of verifying the similarities of the sites and how comparable they are to the subject development. Furthermore the submitted information shows that there would be a significant increase in trip generation overall which would adversely impact the junctions of the service roads on the east and west of the site with Lincoln Road. There is also no evidence to demonstrate that the proposed additional traffic can be accommodated on site and on the surrounding public highway network without any further delays to traffic on Lincoln Road.
- 6.40 The GLA found that the trip generation methodology and forecast was acceptable however a trip generation forecast for all modes of transport would be required to fully assess whether any public transport mitigation is required and secured as necessary. The GLA also stated that the Transport Assessment has found that there will be little or no impact on the A10 Great Cambridge Road/ Lincoln Road.
- 6.41 In terms of the car parking layout the changes made during the application process are noted i.e. improvements to pedestrian crossing, the removal of the staff car parking spaces from the service yard and the re-configuration of the long and short stay cycle parking. However outstanding issues remain, for instance T&T have stated that most of the spaces in the corners of the car park (i.e. 5, 6, 21, 22, 27, 28, 29 etc.) would be difficult to use with vehicles struggling to pull in and out when neighbouring spaces are occupied. Spaces numbered 50-53 and the trolley holding area in the middle of the car park should be removed. The GLA has stated that the external layout would need to be amended to be more attractive to pedestrians and cyclists to promote walking and cycling. Furthermore TfL have also raised concerns with the proposed layout of the servicing area and the potential to cause congestion and stated that the applicant must be required to adopt a booking system so that no vehicles have to wait on the highway to access the area.
- 6.42 Policy DMD47 states that new development will only be permitted if the access and road junction which serves the development is appropriately sited and is of an appropriate scale and configuration and there is no adverse impact on highway safety and the free flow of traffic. A delivery and servicing plan would be required that accords with TfL guidance, London Plan policy 6.14 and the local plan.
- 6.43 Insufficient information has been provided on the trip generation and impacts and parking provision and an unacceptable external parking layout to the front of the site has been provided, leading to conditions prejudicial to the free flow of traffic and highway safety. The proposal would be contrary to Policies CP24 and CP25 of the Core Strategy, Policies DMD19, DMD45 and DMD47 and DMD48 of the



Development Management Document and Policy 6.3 and 6.14 of The London Plan.

### Flooding

- 6.44 Policy DMD59 states that new development must avoid and reduce the risk of flooding, and not increase the risk elsewhere. Policy DMD61 states that a Drainage Strategy will be required for all development to demonstrate how proposed measures manage surface water as close to its source as possible and follow the drainage hierarchy in the London Plan.
- 6.45 A flood risk assessment was submitted with the application however the FRA did not take into account surface water flood risk and the sustainable drainage strategy does not comply with policy requirements. A revised FRA was submitted and reviewed by the SuDS Officer however the retrofit of sustainable drainage across the site still has not been maximised for instance rain gardens or a green/brown roof have not been incorporated within the scheme. Consequently a condition would be attached to any permission to ensure that a SUDS strategy is submitted for LPA approval.

### Sustainable Design and Construction

- 6.46 Policy DMD49 states that all new development must achieve the highest sustainable design and construction standards having regard to technical feasibility and economic viability. An energy statement in accordance with Policies DMD49 and DMD51 is required to demonstrate how the development has engaged with the energy hierarchy to maximise energy efficiency.
- 6.47 Policy DMD50 requires major non-residential development to achieve an Excellent BREEAM rating. For new developments Policy DMD51 relates to energy efficiency standards and requires a 35% reduction in carbon dioxide emissions over Part L of the Building Regulations 2013.
- 6.48 Policy DMD55 requires all available roof space/ vertical spaces to be available for the installation of low zero carbon technologies, green roofs and living walls subject to technical and economic feasibility and other relevant planning considerations.
- 6.49 An Energy Report has been submitted which demonstrates that the development has gone some way in achieving CO2 reductions and sets out a target to achieve at least a 9% reduction in carbon emissions over Part L 2013.
- 6.50 Several conditions relating to sustainability would need to be attached to any permission.

### Trees, Landscaping and Biodiversity

- 6.51 In line with Policy DMD81, developments must provide high quality landscaping that enhances the local environment. A landscaping plan has been submitted and has been reviewed by the tree Officer who raised no concerns with the proposal.

### Contamination, noise and air quality

- 6.52 Policy DMD64 sets out that planning permission will only be permitted if pollution and the risk of pollution is prevented, or minimised and mitigated during all Phases of development.
- 6.53 The Environmental Health Officer was consulted and raised no concerns with the scheme subject to the attachment of conditions relating to a construction management plan (including details of dust and emissions).

### S106

- 6.54 Policies 8.1 and 8.2 of The London Plan (2011) seek to ensure that development proposals make adequate provision for both infrastructure and community facilities that directly relate to the development. Developers will be expected to meet the full cost of facilities required as a consequence of development and to contribute to resolving deficiencies where these would be made worse by development. In accordance with the S106 SPD an Employment and Skills Strategy, a travel plan and travel plan monitoring fee should be secured through a S106 legal agreement.

### CIL

- 6.55 There would not be an increase from the existing floor space and therefore the scheme is not liable to the Mayoral or Enfield CIL.

## **7.0 Conclusion**

- 7.1 The application site is located within the Great Cambridge Road and Martinbridge Industrial Estate which is designated as Strategic Industrial Land (SIL) and is more specifically defined as an Industrial Business Park (IBP). Although the proposal would generate a moderate number of jobs and contribute to the boroughs economy, the introduction of a retail use on the site would reduce the industrial capacity of SIL in the borough which has been identified for increased industrial capacity. There is an objection in principle to the loss of industrial land and this is supported by the GLA. There is also no sufficient justification to outweigh the clear and strong policy position regarding the safeguarding of strategic industrial land which is an important consideration and needs to be given significant weight given the need to retain remaining industrial land to support local employment, due to the planned regeneration proposed across the Borough including at Meridian Water. It is also important to note that the site is not vacant and the unit has not been actively marketed for Class B8 use or any alternative use appropriate to the SIL designation.

- 7.2 The proposed change of use would also result in traffic and transport implications to the detriment of the safe and free flow of the highway and insufficient information has been provided to demonstrate that the proposed change of use to a mixed commercial use (B8/A1) would not adversely undermine the vitality and viability of the Enfield Town Centre and the four district centres.

## **8.0 Recommendation**

That PLANNING PERMISSION BE REFUSED for the following reasons:

1. The proposed change of use to a mixed commercial use (B8/ A1) would result in the loss of industrial floor space within the Martinbridge Industrial Estate which is located within a Strategic Industrial Location (SIL). The proposal would compromise the function and operation of the industrial area as a whole and result in a significant loss of industrial capacity. The proposal would be contrary to the aims and objectives outlined in the National Planning Policy Framework, Policy 2.17 of the London Plan 2016, Policy CP14 of the Enfield Core Strategy 2010, Policies DMD19 and DMD21 of the Enfield Development Management Document 2014, Policy 6.2 of the North East Enfield Area Action Plan 2016, the Enfield Employment Land Review (2012) and as well as.
2. Insufficient information has been provided to demonstrate that the proposed change of use to a mixed commercial use (B8/A1) would not adversely undermine the vitality and viability of the Enfield Town Centre and its four district centres, this would be contrary to Policies CP17 and CP18 of the Enfield Core Strategy 2010 and Policy DMD25 of the Enfield Development Management Document 2014.
3. Insufficient information has been provided on the trip generation and impacts and parking provision and an unacceptable external parking layout to the front of the site has been provided, leading to conditions prejudicial to the free flow of traffic and highway safety. The proposal would be contrary to Policies 6.3 and 6.14 of The London Plan 2016, Policies CP24 and CP25 of the Enfield Core Strategy 2010, and Policies DMD19, DMD45 and DMD47 and DMD48 of the Enfield Development Management Document 2014.
4. A Section 106 legal agreement to secure the contributions towards the implementation of an Employment Skills Strategy and a Travel Plan has not been advanced and secured. This would be contrary to the National Planning Policy Framework 2012, Policy 8.2 of the London Plan 2016, Policies CP16, CP24 and CP46 of the Enfield Core Strategy 2010, the Enfield s106 Supplementary Planning Document 2016.