

Meridian Water Phase 2

in the London Borough of Enfield

planning application nos. 19/02717/RE3, 19/02718/RE3 & 19/02749/FUL

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

GLA/4921 - Full application for Strategic Infrastructure Works to support the wider Meridian Water Masterplan.

GLA/4921a - Change of use of buildings (units 4, 5, 6, 9 and 9a) and adjacent land to an events and entertainment space ('The Drumsheds') for a temporary period of five years.

GLA/4921b - An outline planning application, with all matters reserved for development of Phase 2 of Meridian Water comprising up to 2,300 residential units (Class C3), Purpose Built Student Accommodation and/or Large-Scale Purpose-Built Shared Living (Up to 18,000 sq m); a hotel (Up to 16,000 sq m), commercial development (Up to 26,500 sq m - Class B1a,b,c); retail (Up to 2,000 sq m), social infrastructure (Up to 5,500 sq m), a primary school up to three forms of entry, new public open spaces and associated works.

The applicants

The applicants are the **London Borough of Enfield**, the architects are **Karakusevic Carson**.

Strategic issues

Principle of development: The principle of a residential-led redevelopment of the site and Strategic Infrastructure Works (SIW) is broadly supported in this Opportunity Area and Housing Zone. However, the proposal would result in the significant loss of industrial land in an area where future provision is uncertain. Accordingly, the applicant is strongly advised to secure a minimum quantum of new floorspace for industrial use only. The applicant must also demonstrate that the proposed SIW on the Stonehill Industrial Estate will not prejudice future industrial redevelopment.

Affordable Housing: The proposed 43% affordable housing offer (split 70:30 in favour of London Affordable Rent) is supported as a starting point, subject to clarification of how this could be increased through a phased review mechanism. . Early and Late Stage Viability Review Mechanisms should also be secured.

Urban Design: The overall approach to the masterplan layout, heights and massing is supported. Further refinement of the southern entry into the site from Leaside Road Site and further information on courtyards and the Riverside Path are required. A high standard of residential quality, including PBSA and LSPBSL should be more robustly secured in the Design Code.

Transport: For the development to be acceptable in strategic transport terms, bus services must be enhanced and integrated (Phase 2 and SIW). This requires £2,750,000 for rerouting and extending bus services to site (linked to SIW), and £4,175,000 for capacity enhancements along the same routes to meet the needs of future residents, visitors and workers (linked to Phase 2). The phasing of the development needs to be coordinated with delivery of the SIW, using Section 106 obligations as appropriate. Suitable safeguards and mitigation must be undertaken to support the operation of large events within the temporary use.

Further information relating to **agent of change, climate change, flood risk, and green infrastructure** is also required.

Recommendation

That Enfield Council be advised that while the schemes are generally supported in strategic planning terms, the applications do not fully comply with the London Plan or draft New London Plan, for the reasons set out in paragraph 129 of this report.

Context

1 On 16 August and 4 September 2019 the Mayor of London received documents from Enfield Council notifying him of planning applications 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 must provide the Council with a statement setting out whether he considers that the applications comply 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 applications are referable under the following Categories of the Schedule to the Order 2008:

- 1A.1 *“Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats.”*
- 1B.1(c) *“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 outside Central London and with a total floorspace of more than 15,000 square metres.”*
- 1C.1(c) *“Development which comprises or includes the erection of a building more than 30 metres high and is outside the City of London.”*
- 3B.1 *“Development which occupies more than 4 hectares of land which is used for a use within Class B1 (business), B2 (general industrial) or B8 (storage or distribution) of the Use Classes Order; and which is likely to prejudice the use of that land for any such use”* (application GLA/4921a is only referable under this category)

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

4 The environmental information for the purposes of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 has been taken into account in the consideration of this case.

5 The Mayor of London's statement on this case will be made available on the GLA website www.london.gov.uk.

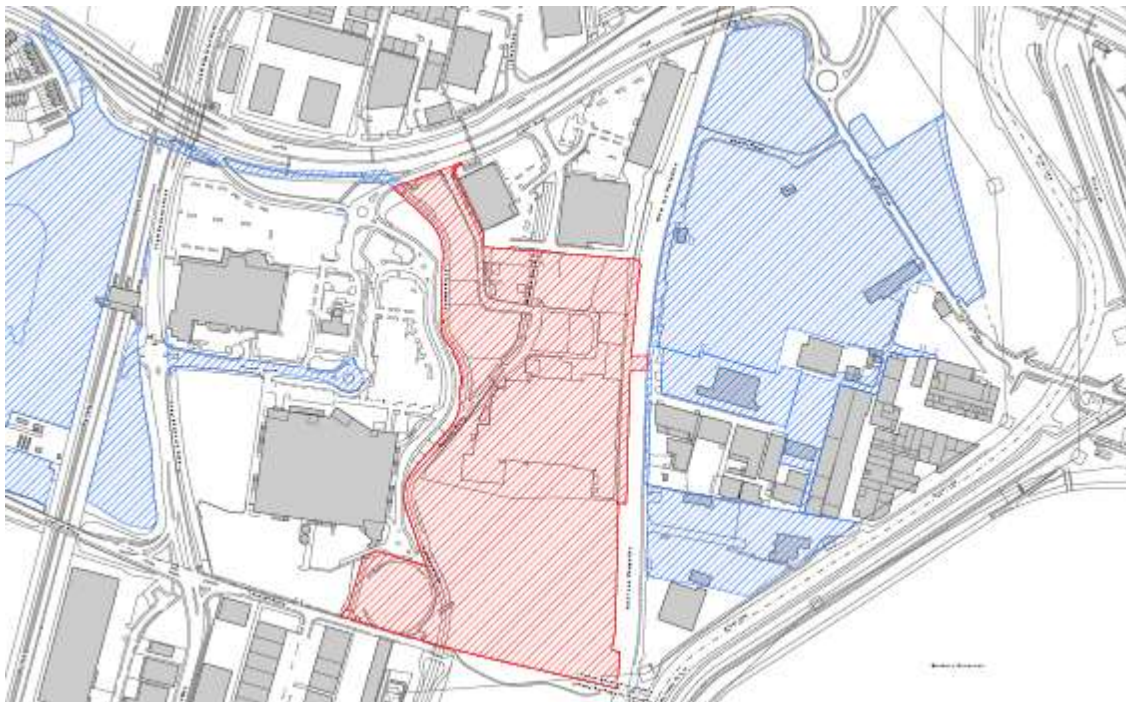
Site description

Main Phase 2 site

6 The application site for the second phase of the Meridian Water Masterplan is approximately 11 hectares located between the River Lee Navigation to the east, Pymmes Brook and Salmon Brook to the west, publicly accessible Green Belt land to the south and Ravenside Retail Park and the A406 Angel Road (North Circular) to the north. The site is made up of three sub areas: the Orbital Business Park to the north of the site, a cleared area of land to the south known as 'Ikea Clear' and a former Gasholder Site located to the south west of the site adjacent to Pymmes Brook.

7 Orbital Business Park comprises hardstanding, currently in use for open storage and warehousing within existing buildings, including a number of large warehouses formerly occupied and used by the British Oxygen Company (BOC). The site has also been temporarily used as an events space. The land known as 'Ikea Clear' has been vacant for approximately 40 years but was

formerly in industrial use. The former Gasholder Site was previously occupied by a gasometer. The gasholder has since been decommissioned and demolished and its foundations filled in. The site is now currently in use for open vehicle storage. The site is shown below in relation to the wider Meridian Water Masterplan area, to the east and west.



Strategic Infrastructure Works site

8 The Strategic Infrastructure Works (SIW) application site is a wider site of approximately 30 hectares bordered by: the River Lea with the London Borough of Waltham Forest beyond, to the east; Leaside Road, Leaside Road and publicly accessible Green Belt land within the London Borough of Haringey to the south; A1055 Angel Edmonton Road (Meridian Way) to the west and the A406 Angel Road (North Circular) to the north. The site is composed of the land within the Phase 2 application site in addition to Land at Stonehill Industrial Estate and land within the Lee Valley Regional Park (LVRP) to the east and Glover Drive and Leaside Road to the west.

9 Land at Stonehill Industrial Estate is largely vacant land within the wider Stonehill Industrial Estate. Stonehill Industrial Estate sits adjacent to the Phase 2 masterplan area on the opposite side of the River Lee Navigation and is a designated Strategic Industrial Location. Land within the LVRP comprises an area of unmanaged and inaccessible vegetation and an area of hardstanding to the east of Stonehill Industrial Estate. The land is designated Green Belt Land and whilst part of the LVRP, is not actively managed. Glover Drive is unadopted highway which provides pedestrian and vehicular access from Meridian Way to the existing Ikea and Tesco stores. Leaside Road is highway adopted by the London Borough of Haringey and provides access to Mowlem Trading Estate, and pedestrian and cyclist access to Tottenham Marshes. The SIW application site is shown in relation to the wider masterplan area below.



Overall context

10 More widely to the west is the retail area dominated by the existing Lea Valley Tesco Extra (with associated petrol filling station and car parking) and Ikea retail stores and associated car parking. Further west beyond Meridian Way is the site of the first phase of the Meridian Water Masterplan and Meridian Water Railway station. To the north of the site is big box retail within the Ravensdale Retail Park. Further north, beyond the A406, is largely characterised by light industrial and storage uses, as well as the Edmonton Eco Park waste-to-energy facility. To the east within the wider Stonehill Industrial Estate are a number of industrial uses and the Edmonton Bus Garage, beyond which is further Green Belt land and Banbury Reservoir. To the south, Mowlem Trading Estate is a Strategic Industrial location, comprising a mix of light industrial uses, and Tottenham Marshes is a large expanse of publicly accessible grassland.

11 The A406 is part of Transport for London Road Network (TLRN). The nearest part of the Strategic Road Network (SRN), the A1010 Fore Street/ High Road is over 1 kilometre west of the site. The A1055 Meridian Way is also an important local distributor road and extends north/south through the masterplan area. In the immediate vicinity of the site, the key local highway connections are Glover Drive, Leaside Road, Argon Way and Harbet Way. Bus routes 192 and 341 are accessible from Glover Drive, serving major the retail stores (Ikea and Tesco). Routes 34 and 444 are served by bus stops on the westbound on-slip of the A406 North Circular Road, to the north of the site on an elevated section of highway.

12 The Public Transport Accessibility Level (PTAL) of the site currently ranges between zero and 2 (with 0 being the lowest level and 6b being the highest accessibility level possible). This is expected to increase to PTAL 3 with the addition of a direct walking link to the station with new and re-routed bus services along the Central Spine Road and Leaside Link Road. The new Meridian Water station on the West Anglia Main Line railway is located approximately 400 metres to the west of the Phase 2 site. Service frequency recently increased to 4 trains per hour in the morning peak period. It provides links to London Underground and other rail services at Tottenham Hale and Stratford stations

13 The site is identified in Enfield’s Local Plan as a Placeshaping Priority Area and is in the Upper Lea Valley Opportunity Area. It is identified as part of a growth area within the Upper Lee Valley Opportunity Area Planning Framework. The wider Meridian Water area is designated as a Housing Zone. The outline application represents the second phase of Meridian Water. It comprises part of Zones 2, 4 and 5 within the Meridian Water Masterplan (as shown in the map below). It also falls within the emerging Edmonton Leaside Area Action Plan area. The SIW application is proposed to introduce key infrastructure required to enable Phase 2 and later phases of the Meridian Water masterplan and is within Zones 6, 7 and LV1.



Case history

14 A series of pre-planning application meetings have been held between the applicant, Enfield Council planning officers and the Greater London Authority on the above proposals. An initial meeting was held on 17 October 2018, with a follow up meeting held on 5 December 2018. GLA officers concluded that the principle of the redevelopment of the wider Meridian Water Masterplan area, and the Phase 2 proposal, to provide additional employment and homes with supporting infrastructure, is strongly supported. However, it was advised that the scheme should continue to provide industrial and/or distribution-based activities, building on the long-term specialisms of the area. Full support for the Phase 2 proposals was considered to be dependent on agreement to the approach to industrial land designation in the wider AAP area, including both de-designation of existing SIL and LSIS, and designation of new areas.

15 An outline planning application (with all matters reserved, except access to the public highway) for the Meridian Water Masterplan Phase 1 (part 1 on the above map) was referred to the Mayor in March 2016 (GLA Ref: D&P/2734a/02; LPA Ref: 16/01197/RE3). This comprised up to 725 residential units (of which 35% would be affordable housing) in buildings of up to 12

storeys; a new Meridian Water Railway Station (including, , a pedestrian link across the railway; a maximum of 950 sq.m. retail (A1/A2/A3) floorspace; a maximum of 600 sq.m. of community (D1) floorspace; and a maximum of 750 sq.m. of leisure (D2) floorspace.;associated site infrastructure works; public open space and play areas; and various temporary 'meanwhile' uses without structures (landscaping and open space). In his response at Stage 1 the Mayor advised that while the development was strongly supported in strategic planning terms, issues with respect to the level of affordable housing, urban design, climate change and transport should be addressed before the application is referred back to the Mayor. The application was referred back to the Mayor in April 2017 and the above matters were found to be appropriately addressed. Planning permission was subsequently issued in July 2017.

Details of the proposal

16 An outline application for Phase 2 of the masterplan (with all matters reserved) and a full detailed application for SIW have been submitted in tandem and are considered jointly this report. A full detailed application for the temporary use of five existing industrial sheds and adjacent land, within the redline boundary of the above applications has also been submitted. This temporary proposal forms part of the meanwhile use strategy of the masterplan and is also considered in this report.

17 These applications form the second in a series of phases of the wider Meridian Water proposed development. As noted above, the first phase was granted permission in July 2017 and has since been implemented by the Council and Network Rail with Meridian Water railway station opening in June 2019 and the selection of a development partner for its delivery. The Phase 2 proposals and associated infrastructure works are considered to be important in establishing east-west links across the masterplan area to provide access to surrounding communities and linkages with the nearby Lee Valley Regional Park.

Phase 2 outline application

18 The outline application proposes the comprehensive redevelopment of Meridian Water Development Zone 4 and 5 and a part of Zone 2 for up to 284,000 sq.m of residential-led mixed use development. The development comprises the following elements:

- Up to 2,300 new homes (Use Class C3), of which 40% shall be affordable;
- Option to provide a Hotel (Use Class C1) circa 250 rooms with up to 16,000 sq m GEA (allowing for a range of specification from budget to luxury);
- Option to provide Purpose Built Student Accommodation (PBSA) and/or Large-Scale Purpose-Built Shared Living (LSPBSL) (Sui Generis) with up to 18,000 sq m GEA in total;
- Up to 26,500 sq m GEA of commercial development (Use Class B1a,b,c);
- Up to 2,000 sq m GEA of retail (Use Class A1 and/or A2 and/or A3 and/or A4);
- Up to 5,500 sq m GEA of social infrastructure (Use Class D1 and/or D2);
- A three-form entry primary school;
- The associated works to create hard and soft landscaping, new public open spaces including equipped areas for play, sustainable drainage systems, car parking provision, and formation of new pedestrian and vehicular access.

19 Detailed designs for the individual development plots and internal roads (excluding those proposed in the SIW application) will be submitted as part of Reserved Matters applications, which will come forward subsequent to this application. The primary infrastructure is proposed within the SIW application; however, internal minor roads, walkways and further infrastructure

may come forward as Reserved Matters separate to the individual development plots. The public realm and plot layout are shown below.



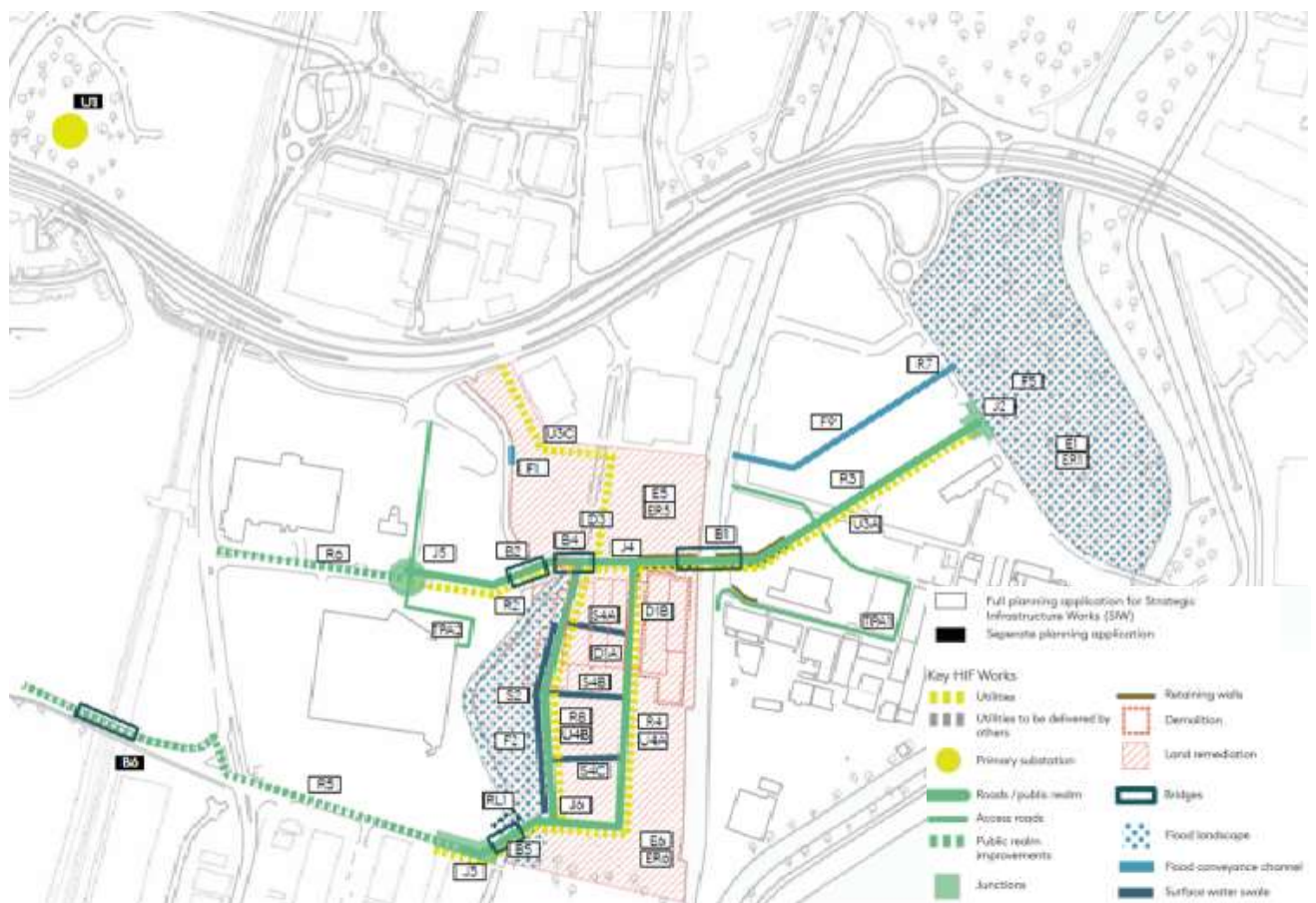
Strategic Infrastructure Works application

20 Strategic infrastructure works have been identified to enable Phase 2 and later phases of the masterplan to be realised. The infrastructure works seek to remediate the site, introduce parks to provide flood attenuation, provide flood defence measures and create new roads and utilities networks. These works form part of a successful Housing Infrastructure Fund application and are proposed within the detailed Strategic Infrastructure Works (SIW) application which comprises the following elements:

- **The Central Spine Road** - a tree-lined east-west boulevard connecting to Glover Drive and new Meridian Water Station in the west, crossing the Pymmes and Salmons Brook and River Lee Navigation to Harbet Road in the east;
- **Leaside Link Road** – a link road providing access for cars, pedestrians and cyclists from Leaside Road through to the Central Spine Road;

- **Bridges (x4)** – erection of bridges and associated works to enable the Central Spine Road and Leaside Link Road to span the Pymmes and Salmons Brook and River Lee Navigation;
- **Brooks Park and River Naturalisation** – naturalising the channelised Pymmes Brook to introduce an ecological river landscape, as well as providing riverside parkland;
- **Edmonton Marshes and Flood Alleviation Works** – re-levelling and remediation of land to the east of Harbet Road, providing comprehensive flood alleviation works and a new public open space within the Lee Valley Regional Park.
- **Access Works** – third party access works to provide new and altered accesses to the IKEA store, a north-south link between Argon Road and Glover Drive, the creation of a link between the Central Spine Road and Anthony Way and other improvements to maintain access, along with other ancillary highway works to Glover Drive, Leaside Road and Meridian Way.
- **Earthworks, Remediation, Utilities and other ancillary works** – earthworks, retaining structures and remediation within Development Zones 4 and 5, installation of main utility networks and ancillary works including the demolition of existing buildings and structures.

21 Plans setting out the proposed infrastructure works are shown below.



Temporary use application

22 The temporary use application relates to five industrial sheds (units 4, 5, 6, 9 and 9a) in the southern part of the Orbital Business Park and land known as 'Ikea Clear' adjacent to Orbital Business Park to the south. The proposals seek the use of the buildings and land as an events and entertainment space for a period of 5 years and forms part of the meanwhile use strategy of the wider masterplan applications. No external works are proposed as part of the application. The applicant anticipates the site would likely accommodate a range of events in the first three years with capacities up to 30,000.

Strategic planning issues and relevant policies and guidance

23 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 2010 Enfield Core Strategy, 2014 Development Management Document and the 2016 London Plan (Consolidated with Alterations).

24 The following are also relevant material considerations:

- The National Planning Policy Framework and National Planning Practice Guidance;
- The draft New London Plan consolidated suggested changes version (July 2019). The Panel of Inspectors appointed by the Secretary of State issued their report and recommendations to the Mayor and this was published on the GLA website on 21 October 2019. In line with paragraph 48 of the NPPF, the weight attached to the draft London Plan should reflect the stage of its preparation; the extent to which there are unresolved objections to relevant policies; and the degree of consistency of the relevant policies in the emerging Plan to the NPPF;
- Affordable Housing and Viability SPG (August 2017) which must now be read subject to the decision in R (McCarthy & Stone) v the Mayor of London;
- Upper Lee Valley Opportunity Area Planning Framework (2013);
- Meridian Water Masterplan (July 2013);
- Draft Edmonton Leaside Area Action Plan (Post Examination Update, August 2019);
- Enfield Council's Towards a new Local Plan 2036 (Public Consultation Version, December 2018).

25 The relevant issues and corresponding policies are as follows:

- | | |
|-------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| • Opportunity Areas | <i>London Plan; New London Plan;</i> |
| • Industrial Land | <i>London Plan; New London Plan; Land for Industry and Transport SPG;</i> |
| • Employment | <i>London Plan; New London Plan; Land for Industry and Transport SPG;</i> |
| • Retail and town centre uses | <i>London Plan; New London Plan; Town Centres SPG;</i> |
| • Student Accommodation | <i>London Plan; New London Plan;</i> |
| • Shared Living | <i>London Plan; New London Plan; Affordable Housing and Viability SPG;</i> |
| • Visitor infrastructure | <i>London Plan; New London Plan;</i> |
| • Housing | <i>London Plan; New London Plan; Housing SPG; Housing Strategy; Shaping Neighbourhoods: Play and Informal Recreation SPG; Shaping Neighbourhoods: Character and Context SPG;</i> |
| • Affordable housing | <i>London Plan; New London Plan; Housing SPG; Affordable Housing and Viability SPG; Housing Strategy;</i> |

- Social infrastructure *London Plan; New London Plan; Social Infrastructure SPG;*
- Urban design *London Plan; New London Plan; Shaping Neighbourhoods: Character and Context SPG; Housing SPG;*
- Sustainable development *London Plan; New London Plan; London Environment Strategy*
- Transport *London Plan; New London Plan; the Mayor's Transport Strategy;*
- Crossrail *London Plan; New London Plan; Mayoral Community Infrastructure Levy; Use of planning obligations in the funding of Crossrail and the Mayoral Community infrastructure levy SPG;*

Principle of development

Main outline application

Non-designated industrial sites and industrial capacity

26 Given the existing and former land uses of the component parts of the site as outlined in the site description above, the entire site is considered to be non-designated industrial land. Land to the east of the site beyond the River Lee Navigation is currently designated as a Strategic Industrial Location (SIL), which is no longer proposed for release following post examination modifications to the Edmonton Leaside AAP (ELAAP).

27 London Plan Policy 4.4 states that a rigorous approach is required to ensure a sufficient stock of land and premises to meet the future needs of different types of industrial and related uses, including good quality and affordable space; and that any release of surplus industrial land must be planned, monitored and managed. This applies to SIL, locally significant industrial sites, and non-designated industrial sites. Enfield is classified as a 'limited release' borough on Map 4.1 of the London Plan. London Plan Policy 2.17 states that development proposals within or adjacent to SIL should not compromise the integrity or effectiveness of these locations in accommodating industrial type activities.

28 Policy E4 of the draft New London Plan also seeks to ensure a sufficient supply of land and premises to meet current and future demands for industrial and related functions to be maintained, and states that any release should be facilitated through industrial intensification, co-location, and substitution as set out in Policy E7. This applies to SIL, locally significant industrial sites, and non-designated industrial sites. In response to updated strategic evidence on the supply and demand for industrial land, Enfield has been reclassified as a 'provide capacity' borough in Table 6.2 of the draft New London Plan. The recently published Inspector's Panel Report into the New London Plan does not include significant recommendations to the industrial land policies. As such these policies can be afforded significant weight.

29 Draft New London Plan Policy E7 supports mixed use developments on non-designated industrial sites where the site has been allocated in the adopted local development plan document for residential or mixed-use development. Whilst the site is not explicitly allocated within Enfield's current planning framework, the site (a non-designated industrial site) is identified as a major residential-led growth area in Enfield's Core Strategy (Policy 38); the Upper Lee Valley Opportunity Area Planning Framework; the Meridian Water Master plan; and the emerging ELAAP. As such, a residential-led redevelopment of the site follows a plan-led approach and is considered to be in line with part D of Policy E7. However, whilst the ELAAP no longer proposes to de-designate SIL within the Meridian Water Masterplan Area and a review of

SIL capacity is proposed in the emerging Local Plan, there remains uncertainty about the future provision of industrial capacity in Enfield and the potential loss of approximately 16,000 sq.m. of non-designated industrial floorspace through this application raises concern.

30 To address the above concern and in recognising the wider benefits of the application, GLA officers advised, at pre-application stage, that the development should seek to secure a minimum amount of dedicated industrial floorspace in a consolidated location. The current application proposes 26,500 sq.m of flexible commercial floorspace. Whilst the flexibility of the B1 floorspace includes capacity for occupation in industrial use, including specifications within the Design Code supporting co-location of industrial uses, this does not go far enough to address the above raised concern.

31 The applicant should seek to secure a minimum amount of industrial floorspace in a consolidated location with appropriate servicing capacity. Plot Z05-01, appears to have been designed with capacity for occupation as a multi-level industrial space and is in a preferable location, to the north of the site, where direct access to the A406 (North Circular) can be achieved. Consideration should be given to broadening the scope of potential industrial uses, particularly in the northern plots, beyond B1(c) to enable to incorporation of heavier industrial type uses in line with Part A of draft New London Plan policy E7. In the first instance, the applicant should look to secure a third of the proposed commercial floorspace for industrial uses; however, the minimum amount acceptable would be subject to assessment of the quality and location of this space, including its ability to accommodate a range of industrial occupiers to meet market demand. Further discussions are required with GLA officers to address this issue.

Potential impact on Strategic Industrial Land

32 As well as securing industrial floorspace capacity, Policy E5 and E7 of the draft New London Plan states that the introduction of residential uses must be delivered in a way that does not compromise the integrity or effectiveness of these locations in accommodating industrial type activities and their ability to operate on a 24-hour basis. This is reflected in Policy D12 'Agent of Change' of the draft London Plan, which places the responsibility for mitigating impacts from existing noise-generating activities or uses, on the proposed new noise-sensitive development. The adjacent SIL to the east (Stonehill Industrial Estate) is physically separated from the site by the River Lee Navigation, the development is further set back behind the proposed riverside open spaces with commercial uses at ground floor level. It should be noted that the Edmonton Bus Garage within this SIL operates on a 24 hour basis. To the South, plot Z2-01 fronts onto Mowlem Trading Estate, which is a SIL within the neighbouring borough of Haringey. The potential introduction of residential uses within this plot raises concerns about mitigation potential, given the proximity to the SIL and the lack of buffer space between the development site and the industrial designation.

33 Further detail of how the development aligns with the Agent of Change principles should be provided, in relation to the interfaces with both Mowlem and Stonehill Industrial Estates. Development proposals should manage noise and other potential nuisances by ensuring good acoustic design to mitigate and minimise noise; explore mitigation early in the design stage, with necessary provisions secured through planning obligations; and separate noise sensitive uses through distance, screening, internal layout, sound-proofing and insulation, and other acoustic design measures. This should also address other impacts, such as dust and odour.

Opportunity Area and residential use

34 The site is located in the Upper Lee Valley Opportunity Area, as identified in London Plan Policy 2.13 and Table A1.1, and Policy SD1 of the draft New London Plan. The London

Plan identifies the Opportunity Area as providing a minimum of 20,100 new homes up to 2031, with an indicative employment capacity of 15,000, which is reflected in the Upper Lee Valley Opportunity Area Planning Framework (OAPF). The draft New London Plan identifies it for 21,000 new homes and 13,000 new jobs from 2019 to 2041. The site is located within the Meridian Water Masterplan area, which is identified for up to 5,000 homes and 3,000 new jobs, although this document is being revised. The site is also within the emerging ELAAP, which identifies Meridian Water to provide around 5,000 new homes and 1,500 net new full-time jobs.

35 London Plan Policy 3.3 and draft London Plan Policy H1 seek to significantly increase the supply of housing in the capital. The London Borough of Enfield is assigned a ten-year housing target of 7,976 units by 2025 within the current London Plan, whilst the draft New London Plan increases the ten-year target to 18,760 units by 2029, although the Panel Report revises this figure down to 12,460. The proposal includes up to 2,300 new homes, equating to approximately 29% of Enfield's ten-year housing target within the adopted London Plan. Accordingly, the proposal would make a significant contribution to increased housing supply within the London Borough of Enfield in response to the strategic targets set out above and is strongly supported.

Principle of commercial workspace

36 As noted above, the site is within the Upper Lea Valley Opportunity Area, Meridian Water Masterplan area and the Edmonton Leaside AAP which identify the site as suitable for increased commercial capacity and seek the creation of new jobs. The development proposes a range of potential workspace typologies across the development plots, including ground floor flexible workspace within mixed use buildings, and standalone floorspace within plot Z05-01 which has flexibility to accommodate a variety of office based and/or light industrial uses. Notwithstanding the above concerns with regard to the potential loss of industrial floorspace, the proposed creation of 26,500 sq.m. of new commercial workspace across the site is supported in principle in line with London Plan policies 2.7, 2.13 and 4.1.

37 The proposals have the potential to introduce a significant quantum of office floorspace to the site. London Plan Policy 4.2 'Offices', and draft New London Plan Policy E1 support increases in the stock of offices of different sizes where there is evidence of demand, particularly in town centres, having regard for the town centres network. Whilst the site would create part of a new town centre, the quantum of office floorspace to be located within the new town centre boundary is unclear. Additionally, there are a lack of uses in the vicinity that would mark the site as an office destination and no evidence has been provided which demonstrates the demand for office space in this location. Nonetheless, the benefits of providing opportunities for job creation are noted given the site's Opportunity Area location. Consideration should be given to New London Plan Policies E1 (Part G) and E2 which encourages proposals to take into account the need for a range of suitable workspace. Suitable mechanisms, such as marketing and further actions strategies, should be secured by condition to minimise the number of vacant ground floor commercial units.

38 Workspace provision across the development site provides accommodation spaces for businesses of a range of different types and sizes, including micro, small and medium-sized enterprises which is in line with London Plan policy 4.1 and draft New London Plan policies E2 and E4 and is supported.

Retail and town centre uses

39 London Plan Policy 2.15 'Town Centres' promotes town centres as the main focus for commercial development and intensification, including residential development. Policy 4.7 'Retail and Town Centre Development' requires that retail, commercial, culture and leisure

development should be focused on sites within town centres, or if no in-centre sites are available, on sites on the edges of centres that are, or can be, well integrated with the existing centre and public transport (the sequential test). Policy 4.7 also requires proposals for new, or extensions to existing, edge or out of centre development to be subject to an assessment of impact. These policies are reflected in draft New London Plan policies SD6, SD7, SD8, and E9.

40 The principle of the creation of a new local centre, providing 2,000 sq.m. of retail floorspace is established in the Core Strategy, the Meridian Water Masterplan and the emerging ELAAP, although the boundaries of the new local centre are not made clear. The proposals include flexible retail provision (Use Classes A1/A2/A3/A4) located along the Central Spine Road and the River Lee Navigation.

41 Up to 950 sq.m. of retail floorspace was consented within Phase 1 of the Meridian Water Masterplan which was considered as additional to the 2,000 sq.m. proposal within the Meridian Water local centre. The provision of a local centre within Phase 2 would support the consented retail provision within Phase 1, with it becoming an 'edge-of-centre' retail location well connected to the proposed local centre. The proposed retail provision is in line with London Plan and draft London Plan policies and is supported

Social infrastructure

42 London Plan Policies 3.16 'Protection and Enhancement of Social Infrastructure', 3.17 'Health and Social Care Facilities', and 3.18 'Education Facilities' support proposals that provide high quality social infrastructure in areas of identified need, particularly in places easily accessible by public transport, cycling and walking. The policies are reflected in draft New London Plan policies S1, S2, and S3.

43 The provision of a new primary school is supported by national and London Plan policy. Paragraph 94 of the NPPF states that "It is important that sufficient choice of school places is available to meet the needs of existing and new communities."

44 London Plan Policy 3.18 'Education Facilities' states that "proposals for new schools, including free schools, should be given positive consideration and should only be refused where there is demonstrable negative impacts which substantially outweigh the desirability of establishing a new school and which cannot be addressed through the use of planning conditions or obligations". Additionally, the Mayor's Social Infrastructure SPG states that new sites for schools should be secured to meet additional educational need.

45 It is noted that the applicant's assessment of education capacity and impacts, provided in the Environmental Statement, finds evidence of surplus school capacity in primary and secondary schools within a 3 mile radius of the site. Notwithstanding this, the provision of a new school at the site is strongly supported in strategic planning terms as a means of addressing the requirements of future residents and residents of the wider masterplan proposals, No additional secondary provision is proposed; however, given the above mentioned capacity and the ability for secondary students to travel further, this approach does not raise concern. Community use of school facilities should be secured through the S106 agreement.

46 The proposed development seeks to provide up to 5,500 sq.m. of social infrastructure (Use Class D1/D2) floorspace located within the proposed local centre, this floorspace is envisaged to be commercially operated. An assessment of need for community facilities found there to be adequate provision within a 2 mile radius of the site as such no dedicated community facilities, such as community centres, are proposed.

47 The development would see the significant regeneration of the area and would introduce a new community to the site. Notwithstanding improvements to public transport, the site is isolated from existing communities in the surrounding area. Draft New London Plan policy S5 states that in areas of major new development and regeneration, social infrastructure needs should be addressed via area-based planning such as Opportunity Area Planning Frameworks, Area Action Plans, Development Infrastructure Funding Studies, Neighbourhood Plans or master plans. Enfield's Infrastructure Delivery Plan and the emerging ELAAP indicate that community facilities such as a community hub, library or youth facility would be required within the Meridian Water regeneration area. Given the above, further information should be provided to explain how the application will deliver a high quality and inclusive dedicated community facility serving needs of residents on site. Clarity on the delivery model of social infrastructure within the development should also be provided to ensure new services are inclusive and cater to residents on a range of incomes.

48 The Environmental Statement identifies that there is currently insufficient capacity in existing healthcare provision in the area and the additional demand from the proposed development is likely to have a significant effect. It is understood that local healthcare providers have expressed a preference for a financial contribution to allow flexibility to expand existing or provide new healthcare facilities to meet rising demand both within Meridian Water and beyond. The financial contribution should be secured by the Council.

Purpose Built Student Accommodation

49 London Plan Policy 3.8(h) 'Housing Choice' states that strategic and local requirements for student housing meeting a demonstrable need are to be addressed by working closely with stakeholders in higher and further education and without compromising capacity for conventional homes. Policy H17 'Purpose-built student accommodation' (PBSA) of the draft New London Plan states that boroughs should ensure that local and strategic need for such accommodation is addressed, provided that it contributes to mixed neighbourhoods; is secured for students; is secured for occupation by one or more higher education institution; provides 35% affordable student accommodation (or 50 per cent where the development is on public land or industrial land appropriate for residential uses); provides adequate living space; and is well-connected to local services. Policy H17 also encourages provision in well-connected locations away from existing concentrations in central London. Paragraph 4.17.1 of the draft New London Plan identifies that purpose-built student accommodation contributes to meeting London's housing need, and that every three student bedrooms equate to meeting the same need that one conventional housing unit meets, and therefore contribute to a borough's housing targets.

50 The application includes flexibility to provide up to 18,000 sq.m. of PBSA which would indicatively provide approximately 450 bedspaces. If developed, the student accommodation would make provision for 40% affordable student housing which would fall short of the 50% threshold for affordable student accommodation, given the former industrial use of the site. A review of financial viability appraisal is currently being undertaken, considering all elements of the residential offer, to establish the maximum amount of affordable student accommodation that can viably be provided. The S106 agreement would need to secure the affordability of the student housing, as well as links to one or more higher education institutions.

51 The application allows for the PBSA to be located in blocks on plots to the north of the masterplan area, within close walking distance to the new local centre. Given the proposals in the surrounding area, the introduction of student accommodation is likely to contribute to the vitality of the new local centre and would be well connected to the local services provided, as well as nearby public transport links. As such the proposed use would contribute to a mixed and

inclusive neighbourhood. Subject to the positive resolution of matters pertaining nomination and affordable student housing, the principle of PBSA is supported and in line with London Plan and draft New London Plan policies.

Large scale purpose-built shared living

52 Draft New London Plan Policy H18 supports large-scale purpose-built shared living (LSPBSL) accommodation where it is of good quality and design; contributes towards mixed and inclusive neighbourhoods; is well-connected to local services and employment by walking, cycling and public transport, and does not contribute to car dependency; is under single management; has minimum tenancy lengths of no less than three months; has sufficient communal facilities and services; provide adequate functional living space and layout; and are not self-contained homes or capable of being used as self-contained homes. A cash in lieu contribution would be required towards conventional C3 affordable housing, either as an upfront payment, or an annual in perpetuity payment. This would need to be equivalent to 50% of the units, as the site is non-designated industrial land, to be provided at a discount of 50% of the market rent. All LSPBSL schemes will be subject to the Viability Tested Route. As with the PBSA above, the application includes flexibility to provide up to 18,000 sq.m. of LSPBSL.

53 Key to the acceptability of this form of housing is the quality of the residential accommodation provided. Further detail should be provided within the Design Code setting out design standards for the LSPBSL, particularly regarding size and layout of private living spaces and both internal and external shared amenity/communal spaces. Operation under single management, minimum tenancy length and details of access to communal facilities and services should also be secured in the S106 agreement

54 In line with draft London Plan policy H18, a cash in lieu contribution towards conventional C3 affordable housing elsewhere on the development is proposed. As above, a review of the financial viability appraisal is currently being undertaken, considering all elements of the residential offer, to establish the maximum contribution towards affordable housing that can viably be provided.

55 The application allows for the LSPBSL to be located in blocks on plots to the north of the masterplan area, within close walking distance to new local centre. The proposals are likely to contribute to the vitality of the new local centre and would be well connected to the local services provided, as well as public transport links. Subject to the positive resolution of matters pertaining quality of the residential accommodation, management and affordable housing, the principle of LSPBSL is supported and in line with London Plan and draft New London Plan policies.

Visitor accommodation

56 London Plan Policy 4.5 'London's Visitor Infrastructure' seeks to achieve a target of 40,000 net additional hotel rooms by 2036, and where located beyond the Central Activities Zone, should be located in town centres and Opportunity Areas with good public transport access. Draft New London Plan Policy E10 also supports such accommodation, and paragraph 6.10.2 identifies that London will need to build an additional 58,000 bedrooms of serviced accommodation by 2041.

57 The application proposes up to 16,000 sq.m. of visitor accommodation floorspace in close proximity to the town centre. Given the above policy context, the principle of new visitor accommodation is supported.

Green and sustainable infrastructure

58 London Plan Policy 7.18 'Protecting Open Space and Addressing Deficiency' provides a strategic aim to address areas with a deficiency of open space. The application secures approximately 2.4 hectares of public open space to be delivered in the form of a new local park (Brooks Park), linear open space along Salmons Brook and the River Lee Navigation, a new public square (Riverside Square) and community streets. The SIW application will provide a further 6.5 hectares of public open space within Edmonton Marshes which sits within the Lea Valley Regional Park (LVRP), which is discussed below. Although the amount of space provided within Phase 2 is below the Local Plan requirement for open space provision in relation to the expected population of the site, having regard for the significant public open space proposed at Edmonton Marshes and given the accompanying SIW application would significantly improve east-west and north-south linkages, for pedestrians and cyclists, to the wider green network, including the LVRP and Tottenham Marshes, the proposed level of public open space is acceptable.

Strategic Infrastructure Works

59 The infrastructure works application proposes a raft of enabling works as described in paragraph 20 above to address existing constraints on the site in respect of flood risk, contamination and transport. The proposed works would enable the redevelopment of brownfield land identified for major redevelopment within the local development plan and within the Upper Lea Valley Opportunity Area in line with the masterplan proposals in place for the site. However, it is noted that the Stonewell Industrial Estate, where part of the proposed spine road, access roads and flood alleviation channel is proposed, is designated SIL. The applicant should therefore demonstrate that these infrastructure works could facilitate a wholly industrial, or mixed residential and industrial development, to ensure that future redevelopment options are not prejudiced. Subject to this, the principle of the proposed infrastructure works are in line with London Plan policy and support the strategic growth aspirations of the site.

60 The proposed infrastructure works include the creation of flood alleviation storage within the LVRP which is designated Metropolitan Green Belt Land. As set out in London Plan Policy 7.2 and draft New London Plan Policy G2, the Mayor strongly supports the continued protection of London's Green Belt. The NPPF provides a clear direction for the management of development within the Green Belt and sets out the processes and considerations for defining Green Belt boundaries. Paragraph 143 of the NPPF states that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. Paragraph 146 establishes that engineering operations which preserve the openness of the Green Belt are not inappropriate.

61 The proposed works would see an enhancement in the visual amenity, biodiversity and recreational value of the land, through the removal of existing hard standing and landscaping works to provide a new publicly accessible park. The proposals will restore the verdant character and openness of the Green Belt land with clear demarcation of Green Belt and the urban area established by Herbert Road. Accordingly, the development is appropriate development within the Green Belt and is supported.

Temporary Use for events space

62 The proposals seek the temporary use of five industrial sheds within Orbital Business Park and cleared land to the south for event and entertainment space for a temporary period of 5 years. Notwithstanding the above concerns with regard to the potential loss of industrial floorspace, given the site is identified for redevelopment in Enfield's Local Plan; the Upper Lee Valley Opportunity Area Planning Framework; the Meridian Water Masterplan; and the emerging Edmonton Leaside Area Action Plan and proposals for the site's redevelopment are currently under consideration, the temporary use of current vacant spaces within the development site is acceptable.

63 The land identified is considered suitable for a large scale events space given its distance from noise and light sensitive uses and recently upgraded transport links. Furthermore, London Plan 4.6 and draft New London Plan policy HC5 support the use of vacant properties and land for meanwhile uses for cultural and creative activities during the day and at night-time to stimulate vibrancy and viability. Accordingly, the proposed temporary uses are considered acceptable subject to appropriate event day management and mitigation which should be secured by condition and where appropriate by planning conditions.

Principle of development conclusion

64 The principle of the proposed redevelopment of the wider Meridian Water Masterplan area, and the Phase 2 proposal to provide additional employment, homes and social infrastructure, together with the associated strategic infrastructure, is strongly supported. However, concerns are raised regarding the potential loss of industrial capacity and the applicant is strongly encouraged to secure a minimum provision of industrial-type floorspace in order to achieve compliance with draft London Plan policies E4 and E7 in this regard. The applicant must also demonstrate that the proposed SIW on the Stonehill Industrial Estate will not prejudice future industrial redevelopment. Further to this, on-going discussion is required on social infrastructure provision, student housing and LSPBSL.

Housing

Affordable housing and viability

65 London Plan Policies 3.11 and 3.12 and draft New London Plan Policy H5 seek to maximise the delivery of affordable housing, with the Mayor setting a strategic target of 50%. Policy H6 of the draft New London Plan identifies a minimum threshold of 35% (by habitable room) affordable housing, with an upper threshold of 50% for industrial sites and public land, such as this site. Applications providing the relevant threshold level of affordable housing before public subsidy; with an appropriate tenure split; having explored potential additionality through grant funding; and, meeting all other relevant policy requirements and obligations to the satisfaction of the Mayor and the Local Planning Authority can follow the 'Fast Track Route'. Such applications would not need to submit a viability assessment, and would not require a late stage viability review mechanism to be secured as part of any legal agreement attached to the permission.

66 As referred to in paragraph 7 above, as the site is a former industrial site and is public land, the relevant threshold for consideration under the 'Fast Track Route' is 50%. The development does not meet this threshold and as such will be considered under the 'Viability Tested Route', whereby a Financial Viability Assessment (FVA) will be considered and any permission will be subject to a late stage viability review. Mid term reviews are also recommended for long-term phased developments, such as this. The mechanism for the requirement of an early stage viability review, triggered if an agreed level of progress on implementation is not made within two years of any permission being granted, should be secured in accordance with draft New London Plan policy H6 and the Mayor's Affordable Housing and Viability SPG.

67 The applicant has submitted an FVA as part of the application. The FVA considers both the scenario where the development delivers its maximum commercial potential (maximum mixed-use) and the scenario where the development delivers its maximum residential potential. In both scenarios the FVA concludes that the maximum the development can deliver is 28% affordable housing by habitable room, without grant. The FVA considers the proposal where the development receives grant funding and concludes that the development can achieve 43% by habitable room. As such, the FVA concludes that the delivery of the Mayor's strategic target of 50% affordable housing is unviable and the maximum amount of affordable housing the development can deliver is 43%.

68 It is noted that the Council, as Local Planning Authority, has not commissioned a review for the FVA at this stage. GLA officers are interrogating the scheme's viability and the viability assumptions made to ensure that the maximum amount of affordable housing is delivered. Following a review of the FVA, the GLA's in-house viability team have provided detailed comments to the applicant and Council in advance of this Stage 1 report.

69 Further discussions are required to ensure that the S106 agreement secures the maximum viable level of affordable housing, the affordability of the offer and any Build to Rent provisions (covenant, clawback and management arrangements). Viability testing should be required for each reserved matters applications and this report updated at each stage.

70 Taking into account these issues, although the Benchmark Land Value (BLV) is considered too high, and is not agreed, the modelling includes some conservative assumptions on build costs so overall the FVA reflects a reasonable position in terms of the ability of the scheme to provide affordable housing based on current day costs and values. GLA officers are of the view that, as the borough is both applicant and local planning authority and has not obtained an independent review at this stage, it is essential that independent advisors are appointed well in advance of the first reserved matters application and at each relevant subsequent stage. It should be clarified how the legal agreement will be structured given the long term phased nature of the development and review mechanisms should be built into the legal agreement to enable later phases or sub-phases to include more affordable housing, should viability improve. The GLA's viability team can support S106 discussions, if required, to ensure the review provisions are adequate.

Tenure mix and affordability

71 Policy H7 of the draft New London Plan and the Mayor's Affordable Housing and Viability SPG set out a tenure split of at least 30% low cost rent, with London Affordable Rent as the default level of rent, at least 30% intermediate (with London Living Rent and shared ownership being the default tenures), and the remaining 40% to be determined in partnership with the Local Planning Authority. In this case, Enfield Council's Core Strategy sets a Borough-wide strategic tenure split target of 70% social/affordable rent and 30% intermediate.

72 The current proposals (informed by Maximum Residential Capacity) makes provision for; 30% intermediate (as London Living Rent and London Shared Ownership) and 70% London Affordable Rent. This accords with the tenure mix requirements set out in London Plan policy 3.11, policy H7 of the draft New London Plan and is supported.

73 The Mayor is committed to the delivery of genuinely affordable housing. In line with draft New London Plan Policy H7, the proposed London Affordable Rent units should be secured by planning obligation at the benchmarks set out annually in the Mayor's affordable housing funding guidance. These rent levels are significantly lower than the Government's definition of affordable rent, which is not affordable or acceptable within London. Shared ownership units should be available to households on a range of incomes below the maximum income threshold set out in the draft London Plan and AMR (£90,000 a year). In addition to this, annual housing costs (including service charges, rent and any interest payment) should be no greater than 40% of net household income. These requirements should be secured in any legal agreement, and carried through subsequent phases, in accordance with London Plan Policy 3.10, Policy H7 of the draft New London Plan and the Mayor's Affordable Housing & Viability SPG.

Housing Choice

74 London Plan Policy 3.8 encourages new developments to offer a range of housing choices in terms of mix and size. Draft London Plan Policy H12 recognises that a higher proportion of one and two-bedroom units is generally more appropriate in more central or urban locations and Part C states that boroughs should not set prescriptive dwelling size mix requirements for market and intermediate homes (although it is noted that the Inspector's Panel Report recommends that Part C be deleted). In strategic planning terms, the target provision of 30% family size (3+ bedroom dwellings) is acceptable, however, GLA officers would expect the provision of family housing to be appropriately prioritised within the social/affordable rent component of the mix, in response to strategic need. As the application is in outline, appropriate conditions are required to ensure that the proposed mix is secured throughout.

Children's playspace

75 London Plan Policy 3.6 and draft New London Plan Policy S4 require development proposals to make provisions for play and informal recreation based on the expected child population generated by the scheme. The Mayor's Play and Recreation SPG and draft New London Plan Policy S4 expect a minimum of 10 sq.m. per child to be provided in new developments. Play space provision should normally be provided on-site; however, off-site provision may be acceptable where it can be demonstrated that this addresses the needs of the development and can be provided nearby within an accessible and safe walking distances, and in these circumstances contributions to off-site provision should be secured by Section 106 agreement. The GLA published an updated play space calculator in June 2019, which is available here and should be used to assess provision: <https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/planning-guidanceand-practice-notes/play-and-informal-recreation>

76 The applicant has calculated a playspace provision requirement of 9,460 sq.m. However, this is based on the 2012 calculator. Based on the GLA's updated play space calculator, a total of 1,199 children would be expected, taking into account the site location and indicative housing mix. This would necessitate a total of 11,999 sq.m. of play space. The development provides a total of 24,000 sq.m. of playable space, including 1,500 sq.m. of dedicated equipped play space. Further information should be provided to demonstrate that the play strategy provides all the required door step play provision required based on the updated calculator. This provision should be agreed with Enfield Council and secured by an appropriate planning condition/obligation.

Urban design

77 Good design is central to all objectives of the London Plan and is specifically promoted by the policies contained within chapter seven, which address both general design principles and specific design issues. London Plan Policy 7.1 sets out a series of overarching design principles for development in London. Other design policies in this chapter and elsewhere in the London Plan include specific design requirements relating to optimising the potential of sites, the quality of new housing provision, tall and large-scale buildings, built heritage, views, and the public realm. New development is also required to have regard to its context, and make a positive contribution to local character within its neighbourhood (Policy 7.4). These objectives are mirrored in the draft New London Plan, with the concept of Good Growth, growth that is socially and economically inclusive and environmentally sustainable, the bedrock of the plan. Policies contained within chapter 3 of the draft London Plan, specifically look to promote development that reinforces or enhances the character, legibility, permeability and accessibility of neighbourhoods.

78 Due to the outline nature of the application, a series of parameter and illustrative plans are included in the application, together with a Design Code, which provides a framework for design against which future Reserved Matters applications will be assessed and be required to accord with. The Design Code sets out a series of design principles, including building design and character setting; materiality street design principles, distribution of non-residential uses; parking; privacy; heights and setbacks; approach to tall buildings; meanwhile use strategy, commercial use standards, student housing standards; access arrangements; public realm and SUDS location and design. The Design and Access Statement also includes an illustrative scheme in line with the parameters and Design Code.

Density and Design Review

79 The London Plan and draft New London Plan seek to optimise housing capacity, taking into account a range of factors including local context, character, public transport provision and good design. Policies D1, D1A and D1B of the draft New London Plan place a greater emphasis on a design-led approach being taken to optimising the development capacity of a particular site and to make the best use of land, whilst also considering the range of factors set out above. The residential density of the proposed development would equate to approximately 193 dwellings per hectare. Whilst the density and height of the application does not trigger the additional design scrutiny requirement set out in Policy D2 of the draft London Plan, the proposals have been subject to six Enfield Design Review Panel workshops, as well as pre-application meetings with GLA and Enfield Council planning and design officers. The pre-application process has positively informed the evolution of the masterplan. The site is located within an Opportunity Area, and is identified for high density development, including tall buildings. Accordingly, noting the positive evolution of the scheme in response to the above-mentioned pre-application process, and having regard urban design and residential quality considerations within this report more generally, the proposed density is acceptable.

Layout

80 The Phase 2 layout principles are broadly supported. The proposed blocks and key routes are aligned to connect with future links towards the new Meridian Water Station to the west, Tottenham Marshes to the south, and future development as part of the wider Masterplan to the east.

81 The block layout and plot sizing creates the potential for a clear hierarchy of routes, streets and public spaces. The layout responds appropriately to its context with a more regular

street pattern proposed along Brooks Park to the west and the River Lee Navigation to the east, south of the Central Spine Road. To the north of the site, a less regular pattern emerges in response to river and road infrastructure, adjoining blocks to the north and the new Riverside Square. The positioning of the blocks in relation to the street layout allows for some views through to the river edge, to the east, and Green Belt land, to the south, which supports legibility and orientation from within the site. The intention to create a tight grain of development to provide a distinctive character and optimised housing density is supported in principle. The creation of Riverside yards provides a parallel north-south route through the Eastern blocks which enhances visual and physical permeability and creates variety to the public realm; however, clarity is required on access through these yard spaces given their dual function as residential courtyards. The Riverside seeks to provide a linear public space which would also support north-south pedestrian and cyclist movement. Whilst broadly supported, this element would benefit from more generous pavement width along the Riverside path. Further information should be provided demonstrating how the proposed configuration would ensure the safe flow of pedestrians and cyclists and encourage pedestrian activity along the Riverside path, including around or under waterway crossings.

82 Parameter plans secure active frontages along key pedestrian routes, including the primary east-west route on Central Spine Road and secondary north-south routes along Parkside Street and Riverside. Active frontages are also secured along Leaside Road and around Riverside Square where increased levels of pedestrian activity are anticipated. The Central Spine Road and Leaside Road are the primary bus routes for the site, with accessible and well located bus stops adding to the urban character and amenity of these streets. Servicing to workspaces are proposed at lower ground floor level on units which benefit from vehicular access, as shown on indicative plans, and free up ground floor frontages for activation.

83 The southern entry into the site from Leaside Road would benefit from a better-defined point of arrival and more generous zone of public realm at the base of the proposed 'landmark' Gasholder Site building. This would also provide an improved physical transition between the proposed school site and residential frontages and support the creation of a buffer between the residential uses within the Gasholder Site and the SIL to the south. Townscape views along Leaside Road and Leaside Link Road should also be tested along their lengths. The creation of sightlines from this route through to the Green Belt land to the south is supported.

84 The utilisation of the form and scale of the former Gasholder Site to inform the design of the new building is supported and has the potential to create a distinctive fulcrum on the approach along Leaside Road, while providing definition to the park edge. The Design Code encourages greater articulation of the form of the site which would enable a more conventional plan form, this approach is supported in terms of enabling more efficient internal layouts and reducing awkward floorplans and single aspect dwellings. As discussed above, consideration should be given to securing further separation from the industrial uses opposite in line with Agent of Change principles.

85 The distribution of character areas across the masterplan is welcomed and will promote legibility and sense of ownership for future residents. Design Code requirements in relation to character areas, block layout, frontages, building design, landscaping and public realm set out robust principles that establish varied and distinct character areas and secures a high quality pedestrian-focussed environment; with active frontages along key routes, and varied and conveniently located green and open spaces.

Height, massing and appearance

86 To the south, the proposed blocks opposite the Mowlem Trading Estate would be up to 10 storeys in height. The Gasholder Site, also opposite Mowlem Trading Estate and marking the southern entry point into the site and into Brooks Park would allow development up to 16 storeys. The eastern riverside blocks would be predominantly up to 8-9 storeys with some taller elements rising up to 12 storeys and a single taller element at the southern most point rising up to 16 storeys. To the west along Brooks park, heights are generally up to 10 storeys with a taller element rising up to 18 storeys at the main junction between the Central Spine Road and Lee Side Link Road. To the north of the Central Spine Road, landmark tall building up to 22 storeys is proposed at the central junction and gateway point into the site. Height across the remaining northern blocks range up to 8-10 storeys, with another taller element, up to 16 storeys, fronting onto Riverside Square. The rationale behind the distribution of height across the site is supported, with taller buildings positioned to relate to key zones of public space and pedestrian routes.

87 Given the development is submitted in outline, limited detail is provided on the proposed architecture of the buildings; however, the Design Code provides sufficient detailed guidance on building design, including specific tall building guidance, to ensure that a good quality of architecture, details and materials will be achieved. The Design Code secures that materials will be of brick and masonry, with no render or panel treatments on primary facades, and trim and detailing will be metal and not plastic. The Code also secures details such as, the configuration of threshold spaces, positioning of ventilation grilles, shuttering to non-residential frontages, balcony soffits to not be rendered, rooftop services to be hidden, solid drained balcony floors, and all drainage and downpipes to be hidden, which indicate a good quality of detailing will be achieved. GLA officers strongly encourage the local planning authority to consider securing retention of the architect through to delivery.

Residential quality

88 London Plan Policy 3.5 'Quality and Design of Housing Developments' and draft London Plan Policy D4 promote quality in new housing provision, with further guidance provided by the Mayor's Housing SPG. This includes minimum standards for internal space and external private and amenity space, as well as the requirement to maximise the provision of dual aspect units and minimise single aspect units, as well as avoiding north facing single aspect units. The design and access statement provided details of typical layouts which accord with the above requirements, these key requirements should form part of the Design Code, together with compliance with the Housing SPG (2016) benchmark ratio for units per core per floor, and secured appropriately by condition. For the avoidance of doubt, compliance with internal space standards and private amenity space standards should be a mandatory requirement in the Design Code.

89 In terms of the PBSA, the Design Code provides minimum space standards for bedroom, studios and shared living spaces, a requirement to provide shared facilities and amenity spaces and supporting Student Management Plans. 5% of bedrooms are to be provided as wheelchair accessible, in accordance with Building Regulations. The Design Code supports the delivery of adequate functional living spaces and layout for occupants and is supported. The standards set out in the Design Code should be appropriately secured by planning obligation or condition as appropriate.

90 Paragraph 4.18.7 of the draft New London Plan specifies that residential accommodation provided in large scale purpose built shared living accommodation (LSPBSL) should be appropriately sized to be comfortable and functional for a tenant's needs and, given the generally small size of private space provided in this form of accommodation, extra emphasis should be placed on providing good quality communal amenity spaces. The Design Code should specifically identify requirements for residential quality of LSPBSL accommodation in terms of

private living space, communal spaces, access to services and management. For the avoidance of doubt, given the different circumstances of occupiers of student accommodation and LSPBSL, the standards for shared living accommodation must exceed those of student accommodation in terms of size of living space and access to communal facilities and services, in line with the requirements set out in draft New London Plan H18

Agent of change principles

91 In line with draft London Plan Policy D12 the applicant will need to demonstrate that there would be sufficient mitigation measures in place to ensure that: i) the proposed combination of future employment and residential uses at the site would successfully coexist as part of the proposed co-location; and, ii) surrounding businesses/industrial areas would not be compromised by the proposed development in terms of their function, access, servicing and hours of operation.

Inclusive access

London Plan Policy 7.2 and draft New London Plan Policy D3 require that all new development achieves the highest standard of accessible and inclusive design. These policies seek to ensure that all new development can be used easily and with dignity by all. The provision of bus routes through the site must be supported by fully accessible bus stops, which can contribute more widely to inclusive environment by the provision of seating, shelter and information. The proposals should ensure that routes from public transport facilities to entrance points are legible and clearly identifiable, and that way-finding makes access easy, safe and comfortable. The application should secure how disabled people access each of the entrances safely, including details of levels, gradients, provision of accessible seating, widths and surface materials of the paths; how they are segregated from traffic and turning vehicles; and how any level changes will be addressed.

92 These principles are included in the applicant's Design Code and should be secured by condition. M4(2) units should be distributed across tenure types and sizes to give disabled and older people similar choices to others, with disabled car parking provision secured close to the residential core entrances. Landscaping and highways conditions should ensure inclusive step-free access is provided within the proposed areas of public realm, with acceptable gradients and convenient movement routes provided, free of barriers.

Climate Change

Energy

93 Based on the energy assessment submitted, an on-site reduction in CO₂ emissions of 82% beyond 2013 Building Regulations compliant development is expected. This would be achieved through a range of passive design features and energy efficiency measures; connection to the Meridian Water District Heating Network and approximately 6,557 sq.m. of Photovoltaic (PV) panels. The Meridian Water District Heating Network is proposed to be a new Energy Recovery Facility at Edmonton EcoPark and is being designed to support all phases of the Meridian Water Masterplan. The network is expected to go online in 2021, initially with back-up boilers. This is acceptable subject to a review of the strategy should the boilers operate for an extended period of time.

94 The applicant should provide a commitment to ensure that the development is designed to allow future connection to a district heating network, and to provide a site-wide heat network served by a single energy centre..

The application therefore complies with London Plan Policy 5.2 and Policy SI2 of the draft London Plan . Accordingly, the remaining shortfall in CO₂ reductions should be met through a Section 106 contribution to the Council's offset fund in order to meet the zero carbon target in place for the residential element.

Flood risk, drainage and water

95 While the general approach to flood risk management for the proposed development emphasising natural flood management solutions is strongly supported, there are elements of the proposal that do not fully comply with London Plan policy 5.12 (and draft New London Plan policy SI12) as it does not clearly address the need for flood resistance or resilience measures. The applicant should clearly explain the planning implications of the change in flood risk resulting from the flood mitigation works and any residual flood risk that may require flood resilience measures. The applicant should also agree specific flood safety measures for the floodable public realm areas with the Environment Agency and the LB Enfield Emergency Management function.

96 The surface water drainage strategy for the proposed development generally complies with London Plan policy 5.13 (and draft New London Plan Policy SI13). The attenuation systems have generally been sized to restrict the surface water discharge in the 10% event to the greenfield rate. Greenfield rate calculations have not been provided so it is not clear what event the selected greenfield runoff rate corresponds to. The applicant should provide greenfield runoff calculations.

97 Centralised attenuation storage is proposed in a swale in Brooks Park and in the Edmonton Marshes, which will both be delivered as part of the Strategic Infrastructure Works. The Brooks Park swale appears to be in the same position as many of the new trees proposed for the park and it is unclear whether it could be effectively implemented. Clarification should be provided as to how these elements will work together.

98 The remainder of the attenuation volume is distributed across the Phase 2 roads and plots. Section 6.1.11 of the Design Code mandates that Phase 2 developments contribute towards the delivery of the drainage strategy, using green infrastructure-based SuDS where possible. The language in this section of the Design Code should be strengthened to require the buildings and infrastructure to incorporate these measures at the earliest stages so that they are accounted for in structural concepts and space proofing exercises. Accordingly a revised Design Code should be provided. A completed London Sustainable Drainage Proforma should also be provided.

99 The proposed development does not meet the requirements of London Plan policy 5.15 (and draft New London Plan policy SI5) as it does not meet the water consumption targets of these policies. The applicant should undertake additional consultation with stakeholders to better inform the options selection for water reuse. The applicant should also provide a clear commitment to implementing a water reuse scheme that supplies internal water demands as well as landscaping demands.

Green infrastructure and biodiversity

100 Green infrastructure has been well considered throughout the proposed development and has evidently been a fundamental element of the design. The provision of public open space, diversity of vegetation, proposed green connections and the multifunctionality of the proposed green infrastructure is all strongly supported. The proposed development has recognised its position relative to the Lee Valley Regional Park and sets out a number of well-considered and ambitious proposals, both within the outline Phase 2 application and detailed infrastructure works.

101 The easternmost part of the Site designated as Green Belt and forms part of the Lee Valley Regional Park. It should be noted however that the land is currently blighted by fly-tipping and no built development is proposed on the land. The applicant should confirm the findings concerning viewpoint 15 and 16 (representative of views from the Green Belt) on page 281 of the TVIA as there appears to be an inconsistency in the table.

102 A commitment is made within the Design Codes stating that “Predominantly residential-led development should achieve the Draft New London Plan Urban Greening Factor target of 0.4”. The same commitment should be made for commercial-led development meeting an Urban Greening Factor of 0.3.

103 The measures proposed to mitigate the effects on the two European biodiversity designations should be secured by planning conditions. Whilst the number of trees proposed to be planted appears to outweigh the number lost, the total number proposed is not clear. This number should be provided. The recommendations set out in the Arboricultural Report should be secured by planning conditions.

Transport: Main outline scheme and SIW

Transport context

104 TfL has already provided detailed pre application advice on the Transport Assessment (TA) model assurance that underpinned the Strategic Infrastructure Works HIF bid and is currently advising on strategic modelling to support the wider masterplan. Through this process, officers would want to ensure in capacity and quality that infrastructure being proposed in this application supports mode shift in accordance with the Mayor’s Transport Strategy and London Plan/New London Plan policy related to Good Growth. This includes the bus only link over the Lee Navigation, increased public transport provision, Healthy Streets led design, pedestrian and cycle facilities. Vision Zero is embedded in the design of new streets, with 20 mph as maximum speed, and an ethos that focuses on people and place, which is welcomed.

105 The proposed development will therefore need to be supported by a package of transport mitigation, with phasing and delivery to be identified as the wider strategic modelling exercise is concluded. The phasing of the development will need to be coordinated with delivery the SIW infrastructure, using Grampian conditions or Section 106 obligations as appropriate. It would be expected that additional funding and modelling will be required to ensure the area is served by a reliable bus network.

Edmonton Bus Garage

106 Edmonton Bus Garage is currently located to the east of the Lee Navigation. Vehicular access via Towpath Road will be severed by the addition of the central spine road. The continued safe and efficient operation of this transport facility must be safeguarded as up to 200 buses currently operate from the site. Proposals and phasing of the diverted road to mitigate the loss of the current bus garage access are welcome and they must be secured by conditions and S106 obligations as necessary in accordance with draft New London Plan policy T3. The design of adjacent residential units must also accord with the agent of change principle set out in Policy D4 to protect residents from 24 hour bus operations.

Public Transport Strategy

107 For draft New London Plan Policy G2 ‘Good Growth’ aim to be achieved on this site, public transport services should have sufficient capacity and quality to meet the needs of future residents,

workers and visitors to the site. The application includes a bus strategy, which is necessary to support this policy outcome. However, a wider public transport strategy should be secured to help ensure public transport system is brought forward in accordance with Policy T1. The strategy should be a guide for Phase 2 implementation and for the wider masterplan.

Active Travel

108 This phase of development should address the pedestrian and cycle severance caused by Meridian Way as this is a key link to Meridian Water Station. The proposed cycle network strategy is supported. There are concerns about how and when the wider cycle network will be delivered and how this is secured in the S106 agreement. Concerns are also raised regarding space around schools and how this would be managed to encourage walking and cycling to school, whilst discouraging car use. Agreement is required on how bus stop infrastructure along Central Spine Road, Leaside Link Road and elsewhere will be delivered. A process should be agreed in the S106 to secure the delivery of bus infrastructure alongside bus network development. The applicant proposes to meet the draft London Plan Cycle Parking Standards which is welcomed. The design of the cycle parking should be prepared in accordance with advice within London Cycle Design Standards. TfL recommends detail design of cycle provision is provided to TfL at early stage of plot and building design.

Rail and London Underground

109 During the AM peak, 290 passengers are expected to use rail and 225 London Underground, during the PM peak 282 expected to use rail and 234 using London Underground. It is noted that the predicted rail demand can be accommodated at Meridian Water based on assumptions about rail capacity in the TA. At Tottenham Hale station the TA indicates that the trains can accommodate additional peak demand from Meridian Water Phase 2. The demand at Tottenham Hale includes rail and bus interchange as well as other modes of arrival (walking, cycling etc). The applicant should also assess how this will impact on station capacity (e.g. gate line, ticket hall, stairs, escalators etc) for the current proposed phase of development, as well as dynamic 'Legion' modelling for the wider master planning scenarios.

Bus strategy

110 The development is expected to generate 695 bus trips during the AM peak hour and 672 during the PM peak hour. Increasing bus access to the area is strongly supported by policy in the London Plan, with new and or extended bus routes using the proposed Central Spine Road and Leaside Link Road. Re-routing buses to site adds additional mileage to the routes effected, which means additional buses need to be run in the schedule to ensure there is no detrimental impact to existing bus users. The S106 should include funding for at least the first 5 years of re-routing/route extension to mitigate this impact. The re-routing of the 192, 341 and 444 costs £550,000 per annum. A S106 contribution would therefore be £2,750,000 to offset additional running costs for 5 years. This ensures bus network changes due to the highway infrastructure do not impact on wider users of the bus network. This payment should be made by March 2022, one year before the highway works are completed to allow TfL to consult the public and other stakeholders on the route.

111 In addition to the required re-routing, to accommodate extra demand due to the new homes and jobs, an increase in the frequencies of routes 192 and 444 by 2 and 1 buses per hour respectively during peak times at a cost of £835,000 per annum is anticipated. This also needs to be funded for five years. A further contribution of £4,175,000 is therefore required to be secured in the S106. If this funding is not secured then the risk is the mode share targets in the TA will not be achieved with detrimental impact on the local and strategic highway, air quality and noise on

site, and road safety. As Phase 2 is being constructed over 11 years, phased payment can be agreed based on occupation, which requires further discussion.

112 The impact on existing bus operations must also be fully mitigated during construction. Conditions should ensure that the Glover Drive bus stands/stops remain operational until replacement or interim bus stands/stops.

Bus priority

113 The applicant is currently undertaking strategic highway modelling to support their masterplan. Following that a microsimulation model (Vissim) should be built to support the delivery of the highway and traffic network changes and to assess impact on bus journey time. This links to the wider masterplan to help support wider area bus priority and traffic signal upgrades, and to enable bus re-routing. For example, buses will be rerouted along Meridian Way through severely congested junctions that could delay buses. Vissim modelling would assess this and help identify mitigation. In total five junctions are expected to need funding for bus priority measures.

Crossrail 2

114 Crossrail 2 supports this proposal, however to deliver the Crossrail 2 scheme and the necessary improvements to the railway, Crossrail 2 will require access at Leaside Road (east of the railway line and partially onto Angel Edmonton Road). This partially overlaps with the Strategic Infrastructure Works application for the 'construction of a link road between Leaside Road and the Central Spine, pedestrian and cycleway improvements to Glover Drive and Leaside Road'. Crossrail 2 seeks two requirements:

- That the Strategic Infrastructure Works programme will not preclude Crossrail 2 construction and logistics requirements and commitment from the applicant to work together with Crossrail 2 to ensure this can be achieved; and
- Access in this location to the railway will be available permanently to Crossrail 2/Network Rail.

Transport: Temporary Events/Festival use

Access to events/festival site

115 Pedestrian access to the site for attendees will be from the south west, via the bridge over Pymmes Brook that connects to Leaside Road. Vehicular access is via Argon Road/ Orbital Business Park to the North and is limited to production traffic only. Any temporary works in the highway should be subject to highway authority approval and independent road safety audits and risk assessments. Evidence that these temporary works are shown to be safe in accordance with Vision Zero must be provided. Temporary crossing points and other traffic management on Meridian Way and Leaside Road are of particular concern due to impact upon the reliability of bus service operations. TfL would expect to be consulted on the details of these arrangements which should be secured through any event management plan. Vehicle access to Watermead Way via Tottenham Hale Station to the south and Leaside Road must be maintained at all times to access the Northumberland Park Depot and Victoria Line Control Centre. TfL would expect safeguards to be secured.

Transport Assessment

116 As the proposed use will be for up to 5 years, the proposals should be supported by a transport assessment in line with TfL guidance and the exact details of which should be agreed with TfL and Enfield Council. This application includes material describing proposed operations for

the four categories (A, B,C, D) of event but doesn't include material for the largest events envisaged (up to 30,000 capacity). Therefore the TA needs to include this scenario as well as this has the largest impact on the transport network. An active travel zone assessment should be undertaken because attendees will also be drawn from the local area. An ATZ assessment covers the key walking and cycling corridors within 20 minutes radius of the site in order to identify deficiencies and appropriate improvements along those routes used by staff and ticket holders attending events. This includes event only as well as permanent wayfinding. The applicant should assess the risks to safety of the cycle and pedestrian routes to and from the site, and identify measures to help ensure they operate safely in line with a commitment to Vision Zero. Routes from the site to the nearest part of the national cycle way network should also be included in this assessment as this runs adjacent to the site. This is to ensure that the risk of collision and personal safety are appropriately assessed and mitigated.

Cycle and Car Parking

117 Proposals are to provide 50 cycle spaces for both staff and festival attendees. This could accommodate only 0.5% of attendees at a 10,000 capacity event, which would not encourage active travel and not accord with draft New London Plan policy T5. The recent Field Day festival provided sufficient cycle spaces for up to a 4% mode share (1,000 spaces). This is a more ambitious target which would result in 400 cycle spaces for this use. Assuming an appropriate quantum of cycle parking is agreed, details of the location and design could be secured by condition to ensure it complies with draft London Plan policy T5A and the London Cycling Design Standards (LCDS).

118 Car parking will be provided for staff and disabled attendees only which is reasonable. In line with draft London Plan policy T6, where car parking is provided, provision should be made for infrastructure for electric or other Ultra-Low Emission vehicles. A Parking Design and Management Plan should be produced and secured by condition including a strategy in place to ensure prioritisation of provision for accessible users (staff should be encouraged to use sustainable travel modes). Further details should be provided regarding parking restrictions on the surrounding road network and measures to prevent overspill.

Edmonton Bus Garage

119 Edmonton bus garage is located approximately 400 metres east of the site. The safe operation of the garage must be maintained, (as per draft London Plan policy T3B1 and E) without obstructions by parked cars or people travelling to and from the venue. Parking must therefore be restricted along Towpath Road through the use of access only closure points and signage. Warning of the bus garage operation should be installed along the pedestrian footway east of Leaside Road. These measures must be secured before first operation of the proposed use and the applicant should liaise with Arriva, the operator of the bus garage.

Taxi pick-up and drop-off point

120 The applicant should clarify the proposed arrangements for taxi pick-up and drop-off. If a new location for the designated taxi-drop off/ pick-up is proposed, detailed plans for the new arrangements need to be provided and approved by TfL Taxi and Private Hire (TPH). TfL requires professional taxi marshals to be deployed to ensure safe operation and access is ensured for all users including disabled taxi users. The designated 'Uber' area separate to other private hire vehicles (PHVS) will lead to confusion and deviation of pedestrians from designated and safe routes. A space for all pre-booked PHVS together is more easily managed from a public safety perspective. Clear plans of signage for the taxi rank and PHVS area and the location of this signage need to be submitted and approved by TfL TPH. A taxi management protocol should be secured by condition to set out principles to help ensure there is a safe provision for all taxi users with details

prepared for each event. It is important that the taxi provision is designed to be accessible by all taxi users including wheelchair users. Sufficient space will need to be provided for ramp access to vehicles. The applicant should demonstrate that the taxi mode share forecasted can be safely accommodated given the designated area capacity as there is concern that taxis may queue back onto the wider highway network.

Network Impact: Rail and London Underground Demand

121 The methodology used to produce mode share projections and trip generation numbers for different category events should be provided. The applicant should consider, for example, whether smaller events would have a more local catchment. For Category D events (2,000 Capacity), the applicant should estimate the number of people using Tottenham Hale station and assess the cumulative impact on station capacity. The applicant should also consider event timings and capacity of less frequent and earlier finishing services on Victoria line on Sunday nights. Appropriate staffing levels and how they can be provided at Meridian Water Station with the train operator should be confirmed in line with draft London Plan Policies T3 and T4. A finishing time of 11pm on a Sunday raises practical concerns for egressing events as the last Victoria Line southbound leaves Tottenham Hale at 23.33 meaning there is a risk that people may be stranded at Tottenham Hale without a safe alternative that can accommodate this level of demand. Earlier finishing times are therefore recommended for Sunday evenings. The application includes timetabling information without properly considering the proposed timings of events and available capacity of the transport system later in the evening, when frequency on the Victoria line and other services are reduced. The applicant must provide further details regarding the management of queues outside the stations (Tottenham Hale and Meridian Water) as well as clarification on communication strategies in place between event staff and operational staff at these stations. The number of staff proposed along the route to and from the station should be confirmed. For larger events (Categories A, B and C), TfL will need extra staff to deal with crowd flows before and after events, which will need to be funded by the applicant. TfL would expect this funding for additional LU staff to be secured in S106 agreement. A demand profile for each category of event (including staff) should be provided, considering primary ingress and egress routes as well as interchanges. Where the applicant is relying on additional train services from Meridian Water for earlier finishing events, evidence of agreement in principle with the train operating company will need to be provided.

Shuttle Bus Services

122 There should be a clear commitment on the use of shuttle bus services based on the scale of the event and the availability of rail services. A London Service Permit would be required for operators. It is recommended that the specification and proposed timetable for these services should be clearly set out and secured in the Section 106 agreement. Details on the location of standing points, drop off/ pick up areas on site and at destination and associated facilities should also be secured by condition.

Bus Network Impact

123 There is concern that road closures, taxi pick-up/ drop off and crowd management will impact on the safe operation of local bus services. Therefore, an assessment should be made within the TA showing there will be no impact. It is expected that larger events would increase demand for bus services at night, particularly route 192, for which the applicant will need to mitigate through Section 106 contributions alongside shuttle bus services. Discussions about the scale and timing of mitigation should be arranged with TfL.

Other mitigation

124 Major events (A, B and C) should be planned in advance to avoid clashing with planned engineering works on the railway and LU network system and events in the wider area. Licensing authorities should coordinate events with neighbouring licensing authorities to minimise impact on the operation of the Victoria Line; particularly for concerts and late finishing events at the Tottenham Hotspur Stadium. It is welcomed however, that other nearby stations will not be promoted as primary transport routes to and from the venue. However, if required in contingency, the applicant will need to discuss how the use of these stations would work with TfL and other stakeholders.

Build-up / break-down of events, production vehicles, deliveries and traders

125 It is noted that within the building and adjacent field events will need to be set up. In accordance with draft London Plan policy T7, a Delivery and Servicing Plan (DSP) should be secured prior to the commencement of the meanwhile use on site.

Local planning authority's position

126 Enfield Council officers are currently assessing the applications.

Legal considerations

127 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 applications comply 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 applications (unless it proposes to refuse application GLA/4921a, in which case it need not refer it back), in order that the Mayor may decide whether to allow the draft decisions to proceed unchanged, or direct the Council under Article 6 of the Order to refuse the applications, 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 applications (applications GLA/4921 and GLA/4921b only) and any connected applications. 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

128 There are no financial considerations at this stage.

Conclusion

129 London Plan and draft New London Plan policies on; Opportunity Areas, industrial land, Green Belt land, community uses, town centre uses, housing, affordable housing, urban design, inclusive access, sustainable development, flood risk and transport are relevant to these applications. The applications comply with some of these policies but not with others as set out below:

- **Principle of development:** The principle of a residential-led redevelopment of the non-designated industrial land and SIW is broadly supported and in line with the strategic objectives of the site. However, the proposal would result in the significant loss of industrial land in an area where industrial provision is uncertain. Accordingly, the applicant is strongly advised to secure a quantum of new floorspace for industrial use only in order to achieve compliance with draft London Plan policies E4 and E7 in this regard. The applicant must also demonstrate that the proposed SIW on the Stonehill Industrial Estate will not prejudice future industrial redevelopment. Further to this, on-going discussion is required on social infrastructure provision, student housing and LSPBSL. The principle of the proposed temporary use is acceptable
- **Affordable housing:** Whilst the 43% affordable housing offer (split 70:30 in favour of London Affordable Rent) is supported in principle, the Financial Viability Assessment is undergoing robust assessment to ensure that the maximum contribution is secured in accordance with the London Plan, Mayor's Affordable Housing and Viability SPG, and draft London Plan. Early engagement with GLA officers is necessary to ensure that affordability, Build to Rent provisions and robust review mechanisms are secured.
- **Urban design:** The massing and layout of the development is well considered and responds positively to its context. The new high street and a series of well-defined character areas are broadly supported in strategic planning terms and proposed a high-quality development. Further refinement of the southern entry into the site from Leaside Road Site and further information on the Riverside Yards and Riverside Path are required. A high standard of residential quality, including PBSA and LSPBSL should be more robustly secured in the Design Code
- **Agent of Change:** Further information is required to demonstrate that consideration has been had to the Agent of Change principle due to the proximity of the proposed development to Strategic Industrial Land.
- **Inclusive access:** The schemes provides appropriate levels of accessible accommodation and public realm. This is supported and should be secured by condition, along with Building Regulations standards M4(2) and M4(3) in line with London Plan Policy 7.2 and draft London Plan Policy D3.
- **Climate Change:** The Energy Hierarchy has been followed as required in London Plan policy 5.2 and draft London Plan policy SI3. The applicant should provide a commitment to ensure that the development is designed to allow future connection to a district heating network, and to provide a site-wide heat network served by a single energy centre, this should be secured by obligation or planning condition
- **Flood Risk, Drainage and Water:** The general approach to flood risk management drainage and water use, for the proposed development emphasising natural flood management solutions is generally supported; however, there are elements of the proposal that do not fully comply with London Plan policy 5.12 and draft New London Plan policy SI12, 5.13 (and draft policy SI13) and 5.15 (and draft New London Plan policy SI5). The applicant should provide further information to address the matters raised.
- **Green Infrastructure:** The provision of public open space, diversity of vegetation, proposed green connections and the multifunctionality of the proposed green infrastructure is strongly supported. Commitment should be made for commercial-led development meeting an Urban Greening Factor of 0.3 and tree protection measures should be secured by condition.

- **Transport:** For the development to be acceptable in strategic transport terms, bus services must be enhanced and integrated to better serve this development (Phase 2 and SIW) in accord with Good Growth GG2 policy, Active Travel and Healthy Streets approach. This requires £2,750,000 for rerouting and extending bus services to site (linked to SIW), and £4,175,000 for capacity enhancements along the same routes to meet the needs of future residents, visitors and workers (linked to Phase 2). The phasing of the development also needs to be coordinated with delivery of the SIW infrastructure, using Grampian conditions or Section 106 obligations as appropriate. Additional funding and modelling will be required to ensure the area is served by a reliable bus network and work associated with reducing pedestrian and cycle severance caused by Meridian Way. The continued safe and efficient operation of this Edmonton Bus Garage must be safeguarded as up to 200 buses currently operate from the site. Suitable safeguards and mitigation must be undertaken to support the operation of large events within the temporary use and to minimise impact on transport users and ensure safety for all users accessing the area

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