

To: Paul Osborn (Chairman) Heather Johnson
David Andrews (Vice Chairman) Chris Kennedy
Susan Barker Graham McAndrew
Ross Houston Gordon Nicholson

A meeting of the **ADDITIONAL EXECUTIVE COMMITTEE** (Quorum – 4) will be held at via remote access:

TUESDAY, 14 MAY 2024 AT 1PM

at which the following business will be transacted:

AGENDA

Part I

1 To receive apologies for absence.

2 DECLARATION OF INTERESTS

Members are asked to consider whether or not they have disclosable pecuniary, other pecuniary or non-pecuniary interests in any item on this Agenda. Other pecuniary and non-pecuniary interests are a matter of judgement for each Member. (Declarations may also be made during the meeting if necessary.)

4 PUBLIC SPEAKING

To receive any representations from members of the public or representative of an organisation on an issue which is on the agenda of the meeting. Subject to the Chairman's discretion a total of 20 minutes will be allowed for public speaking and the presentation of petitions at each meeting.

5 **LAND WEST OF RAMMEY MARSH, ENFIELD. Paper E/856/24**
LAND OWNER REPRESENTATIONS TO SITE
ALLOCATION IN LONDON BOROUGH OF
ENFIELD'S DRAFT LOCAL PLAN 2019-2041

Presented by the Chief Executive

6 Such other business as in the opinion of the Chairman of the meeting is of sufficient urgency by reason of special circumstances to warrant consideration.

- 7 Consider passing a resolution based on the principles of Section 100A(4) of the Local Government Act 1972, excluding the public and press from the meeting for the items of business listed on Part II of the Agenda, on the grounds that they involve the likely disclosure of exempt information as defined in those sections of Part I of Schedule 12A of the Act specified beneath each item.

AGENDA
Part II
(Exempt Items)

- 8 Such other business as in the opinion of the Chairman of the meeting is of sufficient urgency by reason of special circumstances to warrant consideration.

13 May 2024

Shaun Dawson
Chief Executive

**LAND WEST OF RAMMEY MARSH, ENFIELD.
LAND OWNER REPRESENTATIONS TO SITE ALLOCATION
IN LONDON BOROUGH OF ENFIELD'S DRAFT LOCAL PLAN
2019-2041**

Presented by the Chief Executive

EXECUTIVE SUMMARY

In September 2023 officers presented a report (Paper E/818/23) seeking approval for the Authority to enter into a Memorandum of Understanding with the London Borough of Enfield in relation to each party's land ownership of land west of Ramme Marsh. This site was previously also brought to Members in June 2018 to be declared at that time as no longer required for Park purposes (Paper E/567/18) and officers sought approval for the site be disposed on the open market.

The Authority and London Borough of Enfield entered into the Memorandum of Understanding in December 2023 and subsequently appointed consultants to undertake stage one works. The stage one works were required to better understand the potential development capacity and value of the site and the work concluded in April 2024. A separate report outlining the outcome of this work will be brought to the June 2024 meeting.

This report seeks to address the Authority and London Borough of Enfield's representations (as two of the landowners) to the Draft Site Allocation RUR.03 of the Draft New Enfield Local Plan 2019-2041. The emerging London Borough of Enfield Local Plan was approved for publication for a minimum 6-week period of public consultation by Full Council on 21 March 2024. The consultation period commenced on Thursday 28 March and will conclude on Monday 20 May 2024.

RECOMMENDATION

- Members Approve:
- (1) the Authority's representations to the Draft Site Allocation RUR.03 in the London Borough of Enfield's draft New Local Plan (2019-2041) as set out in Appendix B to this report; and
 - (2) delegation to the Chief Executive to make any non-material changes to the above.

BACKGROUND

- 1 The land west of Rammey Marsh (RMW) site was acquired in December 1993 from the Borough of Broxbourne. The site was acquired in its present form of rough grassland and since acquisition has been subject to minimal management. Due to its lack of access and limited potential as open space it has been closed to the public since acquisition. It lies adjacent to the M25 motorway, it is not contiguous with other land in Authority ownership (site is isolated) and has no express access rights benefitting the Authority within its title. In view of its restricted value as open space available for the public to enjoy, Members were asked in June 2018 to (at that time) declare the site as no longer required for Park purposes and therefore surplus to the Authority's requirements and to authorise steps be taken to dispose on the open market.

- 2 To initiate this process the Authority proceeded to include the site in the London Borough of Enfield's (LBE) call for sites process.
 The land ownership of the RMW site totals approximately **27.14 acres (10.98ha)**. Appendix A to this report shows the site area of **14.28 acres (5.78ha)** is owned by the Authority as shown in red, Transport for London (TfL) owns **9.19 acres (3.72ha)** with LBE's ownership in blue of approximately **3.67 acres (1.49ha)**.
 The joint ownership of the LBE and LVRPA land extends to approximately **17.5 acres (7.3 ha)** and is situated at the western end of the overall allocation.

- 3 In seeking to support the initial Local Plan evidence base and the potential marketing of the opportunity thereafter, LBE and LVRPA jointly instructed consultants Montagu Evans to appoint a consultant team to carry out a range of stage one works to provide greater clarity on the following areas:
 - **Highways Design Work** - To identify a workable means of accessing the site and the likely cost, timeframe and other considerations of these works. The purpose of the study is to assess potential access and egress from land within the redline boundary plan, from either the subject site or the public highway, to support the proposed development.

 - **Ground Conditions (Desktop)** -To identify ground conditions and contamination and provide a high level remediation strategy.

 - **Utilities/Services (Desktop/Site Survey)** - To provide a survey plan of utility and service provision to the site and its surrounding area including water (potable), drainage, gas, electricity and telecommunications.

 - **Topographical (site survey)** - To produce a measured topographical plan of the site showing levels and boundaries and other topographical features.

 - **Development capacity/net developable area of site** - High level design work to illustrate and calculate the likely net developable area and the development capacity of the site.

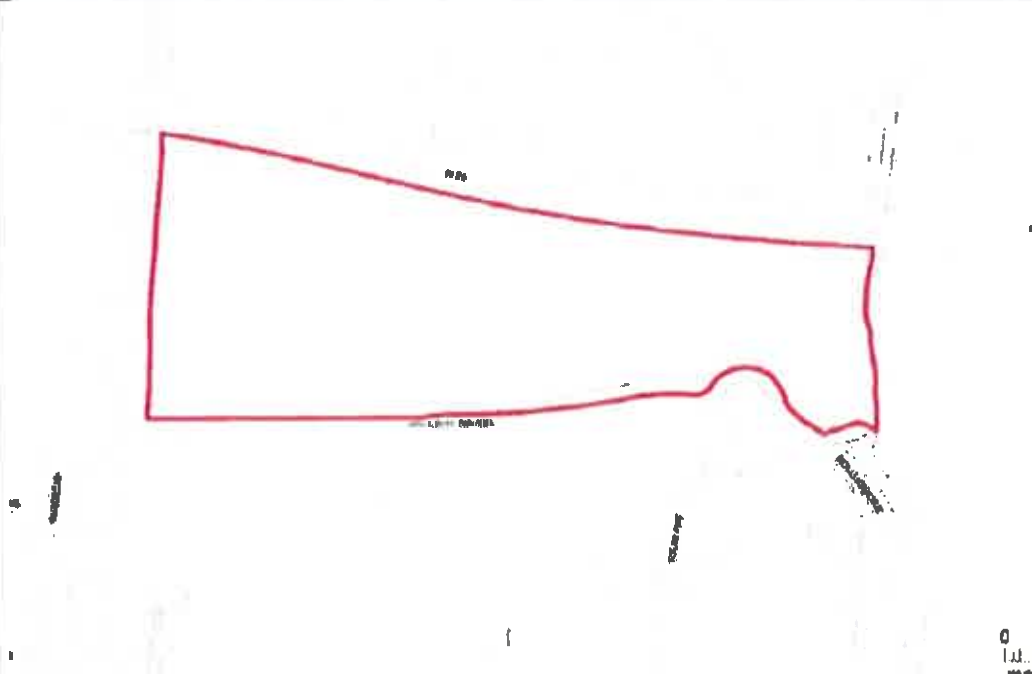
It should be noted that futile attempts were made to engage with TfL before the two parties decided to proceed at least to the first stage of works.

A detailed report setting out the outcome of the above works will be presented to Members at the June 2024 meeting.

- 4 In June 2021 the whole site (including the TfL land) formed part of an allocation within the emerging LBE Local Plan (LP) under reference SA52: Land West of Rammey Marsh (Regulation 18 version).

The site plan and detail as included in the LP Regulation 18 version is shown as follows:

SA52: Land West of Rammey Marsh



| Existing Site Information | | | |
|---|---|------------|-----------|
| Address | Rammey Marsh Mollison Avenue | | |
| Site Area | 12.01ha | | |
| Existing Use(s) | Open land | | |
| Site Considerations | | | |
| Flood Zone | 1 | | |
| PTAL | 1a | | |
| Heritage Considerations | None | | |
| Impacts an Archaeological Priority Area | None | | |
| Proposal | | | |
| Land Use Requirements | <ul style="list-style-type: none"> • Redevelopment should provide at least 70,200 sq m of new employment floorspace (light industrial, general industrial, storage and distribution, and related sui generis) floorspace | | |
| Implementation | | | |
| Timeframe for Delivery | 0-5 years | 5-10 years | 10+ years |
| | - | X | - |

- 5 In Autumn 2022, the Regulation 18 version of the Local Plan was paused. LBE then proceeded with an early release of the Regulation 19 version of the Local Plan on 6th December 2023 prior to consideration by the LBE Full Council on 21 March 2024. The Regulation 19 version included the RMW Draft Site Allocation RUR.03 as Appendix C of the Draft New Enfield Local Plan 2019-2041 and in

keeping with the previous version (Reg 18) seeks to allocate the site for new employment floorspace and remove the site from the Green Belt. The principle of this allocation is consistent with the New Enfield Local Plan Regulation 18 Consultation undertaken in Summer 2021.

- 6 As landowners, both the Authority and LBE are seeking to support the allocation of the site within the new LBE Local Plan and at the Examination in Public (EIP) stage demonstrating that the site is suitable and available for development, noting that the site is currently designated as Local Open Space and as Greenbelt, forming part of Lee Valley Regional Park. The site has been identified (with the TfL land) as part of a wider site for employment development of at least 70,200 sq. m
- 7 It should be noted that in the Site Allocation RUR.03, as set out in Table C1.177 additional details including Design Principles and Infrastructure Requirements were added to the allocation and the site plan amended. Below is the new Reg 19 site plan.



Table G1.177: SA RUR.03- Land West of Ramney Marsh

| SA RUR.03: LAND WEST OF RAMNEY MARSH | | | |
|---|--|----------------------|-----------|
| Existing site information | | | |
| Address | Land West of Ramney Marsh, Mollison Avenue | | |
| Site Area | 12.01 ha | | |
| Existing Use(s) | Open land | | |
| Site considerations | | | |
| Flood Zone | 1 | | |
| PTAL | 1a | | |
| Heritage Considerations | None | | |
| Impacts on Archaeological Priority Area | Within AFA | | |
| Proposal | | | |
| Land Use Requirements | <p>Redevelopment should provide at least 70,200 sq m of new employment floorspace (light industrial, general industrial, storage and distribution, and related sui generis) floorspace.</p> <p>This sites lies within the Lee Valley Regional Park Authority area. Regard must be had to the proposals and policies within the Park Development Framework (2019) and associated documents in assessing any planning application on this land.</p> | | |
| Implementation | | | |
| Timeframe | 0-5 years | 5-10 years | 10+ years |
| Approximate estimated Industrial capacity | | at least 70,200 sq m | |

| SA RUR.03: LAND WEST OF RAMNEY MARSH | |
|--------------------------------------|---|
| Proposal | |
| Proposed use requirements | <p>Reconfiguration of the site:</p> <ul style="list-style-type: none"> A. should contribute towards a crossing provision of more direct and frequent bus services along A1000 to improve connectivity to and from central areas B. should contribute towards enhanced pedestrian and cycle connectivity from Epping Lane Station C. should contribute towards delivery of streetscape improvements (landscaping and tree planting) D. should deliver biodiversity improvements to Ramney Marsh E. must deliver ecological enhancements in strengthening the link between the Lee Valley Regional Park and Epping Chase as part of the wider local green space F. must contribute to the creation of a north-south active travel and accessibility corridor along the Small Heath canal <p>* The Environment Agency has noted that this site is within 260m of a portable groundwater abstraction, is within SPZ1, particularly sensitive with respect to groundwater and as partly or fully overlying historic landfills. Redevelopment proposals will need to comply with the Environment Agency's Approach to Groundwater Protection.</p> |
| Design Principles | <p>Development on the site:</p> <ul style="list-style-type: none"> A. must maximise the provision of existing high quality trees along Mollison Avenue, the Small Heath Lea and the riverside to complement the existing green infrastructure B. must enhance and positively contribute to the existing Wildlife Corridor and Metropolitan SPZ, including greening and ecology enhancements throughout the site C. must create a new public open space along the Small Heath Lea with additional tree planting and biodiversity enhancements D. should provide streetscape improvements along Mollison Avenue and the roundabout, for example wider footpaths, tree planting and the installation of speed humps E. must create active frontages and high levels of local permeability at ground level along key routes F. must create well used loading spaces away from the street edge G. must be articulated and broken down to avoid a large single mass building H. must provide building heights of up to 11m to industrial accommodation I. must be sensitive to the context of the site to minimise impact on neighbouring lower rise existing buildings J. should consider long views from the east when designing loading bays along the eastern edge. Articulation, change of materials, colour or window arrangements should be considered to add visual interest to these important viewpoints K. should provide on-site parking to promote active travel L. must provide pedestrian and vehicular access from Mollison Avenue throughout and a secondary pedestrian access point off Mollison Avenue |

8 Whilst the allocation is positive and welcome and supported by both LBE and LVRPA, there are a number of issues that are to be considered in order to ensure that once allocated, the site is brought forward in a manner that

maximises both the value of the land but also, maximises employment potential of the site in a manner that is consistent with the policies and objectives of the Local Plan.

- 9 Authority and LBE officers, with the advice of external agents and King's Counsel, have agreed the wording attached as Appendix B to this report will form the joint landowner representations to the Enfield New Local Plan (2019-2041). **Members are being asked to approve this document.**
- 10 Paragraphs 11- 19 below detail the salient points of the representations document and the full detail of all the other representations both parties will be making are set out in Appendix B of this report.
- 11 Due to time constraints involved to meet the deadline of making any representations by 20th May 2024, LBE property officers may be required to make some changes to the proposed representations after this report has been discussed with Members. There may then be a requirement for some non-material changes to be made to Appendix B. Officer delegation is therefore required to make any non-material changes.
- 12 **Landowner representations to Enfield's New Local Plan (2019-2041)**

Both LVRPA and LBE have reviewed the evidence base, and the historic representations relevant to the site and the draft allocation. The floorspace figure of 70,200sqm set out within the draft allocation is derived from Table 8 of the Enfield Employment Topic Paper (EETP) (March 2024), which states that based on 65% development plot ratio, the RMW site is capable of providing 70,200sqm industrial and employment floorspace.

- 13 Both parties would highlight that the Regulation 19 draft site allocation includes a number of detailed design principles and land use requirements (that did not form part of Regulation 18 draft site allocation) which will serve to reduce the developable area, and consequently the quantum of floorspace that can be delivered on site, if maintaining the identified 65% development plot ratio.
- 14 In referring to the plan set out in paragraph 7 above, Members will note that these design principles include the creation of a new public open space to the east of the site, along the Small River Lea with additional tree planting, reinforcement and maintaining of existing green buffers along Mollison Avenue, the Small River Lea and the railway line and delivery of ecological enhancement throughout the site, including contributing positively to the Metropolitan Site of Important for Nature Conservation(SINC). The green shading identifies areas for retention, enhancement and creation of new green and public open spaces as seen on the plan above.
- 15 **Allowing for the provision of new public open space adjacent to the Small River Lee and a green buffer around the site of the approximate size indicated on the plan above (para 7) would reduce the developable area from 12.01 hectares to 7.70hectares.**

Based on the above review, both parties therefore suggest that the policy wording is amended to allow for an element of flexibility in relation to the quantum of floorspace that is to be delivered, taking into account the detailed design principles criteria set out within the draft site allocation but also other presently unknown site constraints (such as ground conditions, highways

capacity modelling etc), to ensure that the identified minimum floorspace is indeed deliverable, and commercially viable.

- 16 The representations wording therefore suggests that Table C1.177 (of the Reg 19 version set out in para 7 above) is amended to include an updated developable site area reflecting the above referenced design principles, and not only the wider site area of 12.01ha, as this no longer reflects the developable site area, and the Proposal text be amended to read as follows:

Redevelopment should seek to maximise the quantum of new employment (light industrial, general industrial, storage and distribution, and related sui generis) floorspace.

Site floorspace capacity of at least 70,200 sq m of new employment floorspace is identified within the Council's Employment Topic Paper (March 2024), reflecting historic assumptions relating to developable site area and a target development plot ratio of 65%.

Development proposals should therefore seek to achieve a 65% development plot ratio reflecting the developable site area, site specific constraints and opportunities.

- 17 It should be noted that both parties support maximising efficiency and quantum of commercially viable floorspace that can be delivered at the RMW site, taking into account the site specific constraints associated with the historic use of the site as a landfill, as well as balancing the requirements of the design criteria included within the draft RUR.03 allocation.
- 18 LVRPA and LBE support the proposed allocation of the Ramme Marsh West site for industrial and logistics uses. The representations include suggested revisions to the draft allocation wording to reflect the site specific constraints and opportunities that the RMW site presents.
- 19 **Timing and Phasing**
The allocation sets an approximate estimated implementation timeframe of 5-10 years. It is the LVRPA's view that the site could come forward within a shorter time-frame, and fall within the 0-5 years implementation timeframe. This would allow the socio-economic benefits associated with the proposed development realised within a more immediate timeframe.

This also reflects the findings of the Enfield Employment Topic Paper (EETP) (March 2024), which states at paragraph 3.49 that "*these sites [including Ramme Marsh West] have the potential to come forward early in the plan period.*"

The LVRPA would therefore support an amendment to the draft site allocation to bring forward the implementation timeframe to 0-5 years timeframe.

ENVIRONMENTAL IMPLICATIONS

- 20 There are no environmental implications arising directly from the

recommendations in this report. However Members should note that the June update paper will consider this area into further detail.

FINANCIAL IMPLICATIONS

- 21 If the Authority disposes of this land then there would be financial implications. The capital receipt achieved on any proposed disposal will be included as part of the capital programme funding plan to support the overall programme going forward. Members would also need to give such approval to apply to the Secretary of State for this purpose under S22 of the Lee Valley Regional Park Act 1966 (the Park Act).
- 22 The Authority may derive a greater financial benefit from any disposal of its interest in the joint approach with LBE as the adjacent landowner. Part of the TfL site may be required but it is not currently viewed to provide an added benefit/capital receipt. Again, the June 2024 report will delve into more detail.

HUMAN RESOURCE IMPLICATIONS

- 23 There are no human resource implications arising directly from the recommendations in this report.

LEGAL IMPLICATIONS

- 24 The Authority is able to dispose of any area of land whether in whole or in part when it is no longer required for Park purposes. This must be a properly applied test under Section 21 of the Park Act and all of the facts should be taken into consideration when making a decision to dispose of land. If Members make this initial decision then officers will market the site and a report will come back to Members outlining any offers received and requesting a decision for disposal. Any disposal will require a formal Member decision under Section 21 of the Park Act and Members will again consider the circumstances at the time of that decision and subject to Member approval the Authority will also be required to obtain consent from the Secretary of State. Under Section 22 of the Park Act the Authority is required to obtain approval for the use of any capital receipt obtained under Section 21 of the Park Act.
- 25 The Authority sought written advice from Counsel on its powers to dispose of its property interests for the purposes outlined in its Land & Property Strategy. Members should note that in some cases it may be necessary to take more specific legal advice based on the circumstances of the disposal. This will be considered again when the report requesting a decision to dispose of this land is brought back to Members. At the time of writing this report officers consider that the advice from Counsel is sufficient. It confirms that the Authority can sell land that is not currently required for any of the Authority's functions. The previous report set out the position in that there was no requirement for this land for any of the Authority's functions at that time. It will be necessary for Members to re-consider this at the time any disposal is being considered in a future report.

RISK MANAGEMENT IMPLICATIONS

- 26 The site includes contaminated land although no recent investigations have been carried out to confirm the scale of the contamination. In addition the land

has Green Belt status and Enfield are proposing that the site is removed from the Green Belt as part of the Pre-Submission Reg 19 draft Local Plan – a matter that is likely to be scrutinised as part of the Examination into the Local Plan later this year.

EQUALITY IMPLICATIONS

- 27 There are no equality implications arising directly from the recommendations in this report.

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BACKGROUND REPORTS

PROPOSED DISPOSAL OF : LAND WEST OF RAMMEY MARSH, ENFIELD E/818/23

PROPOSED DISPOSAL OF SITE AT RAMMEY MARSH WEST, ENFIELD E/567/18

APPENDIX ATTACHED

Appendix A Plan showing the site to be considered for disposal including adjacent land owned by LBE and TfL.

Appendix B Site Allocation SA.RUR.03 representations

LIST OF ABBREVIATIONS

| | |
|--------------|--|
| TfL | Transport for London |
| the Park Act | Lee Valley Regional Park Act 1966 |
| RMW | Rammey Marsh West |
| LBE | London Borough of Enfield |
| LVRPA | Lee Valley Regional Park Authority |
| LP | Local Plan |
| EETP | Enfield Employment Topic Paper |
| SINC | Site of Importance for Nature Conservation |
| MoU | Memorandum of Understanding |
| EIP | Examination in Public |

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Rammey Marsh West - Ownership Context

NTS @ A4
07.09.23

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Appendix B to Paper E/856/24

London Borough of Enfield – Site Allocation SA.RUR.03

These representations to Enfield’s New Local Plan (2019-2041) Regulation 19 public consultation are submitted jointly on behalf of Lea Valley Regional Park Authority (LVRPA) and London Borough of Enfield Property (LBEP)¹, in relation to Land at Rammey Marsh, subject to a proposed draft Site Allocation SA.RUR.03 – Land West of Rammey Marsh (‘the draft allocation’, ‘the Site’) to assist the Council’s consideration of the draft allocation.

These Site specific representations should be read alongside the broader representations submitted on the New Local Plan Regulation 19 Consultation by the LVRPA, dated [XX 2024]. The enclosed representations do not therefore engage with the wider policies set out within the Draft Local Plan, focusing solely on Draft Site Allocation RUR.03 – Land West of Rammey Marsh.

Site Allocation – SA RUR.03 – Land West of Rammey Marsh

i) Introduction

The Site extends to 12.01ha, and forms part of the wider Rammey Marsh area, part of the Lee Valley Park. Lee Valley Park extends to circa 10,000 acres of land, across circa 26 miles, and is managed by the LVRPA.

Draft Site Allocation RUR.03 (Appendix C of the Draft New Enfield Local Plan 2019-2041) seeks to allocate the Site for new employment floorspace, and remove the Site from the Green Belt. The principle of this allocation is consistent with the New Enfield Local Plan Regulation 18 Consultation undertaken in Summer 2021.

The Site is in three ownerships, namely LVRPA, Transport for London and London Borough of Enfield. Whilst LVRPA are the majority land owner of the Site, they are collaborating with LBEP with a view to maximising the development potential of their landholdings and not prejudicing the delivery of the Transport for London land.

ii) Principle of Proposed RUR.03 Rammey Marsh West Site Allocation

The Rammey Marsh West employment allocation was proposed by the LVRPA as part of the plan making process in preparation of the Regulation 18 Local Plan Consultation. The LVRPA continue to strongly support the principle of industrial and logistics uses on this Site, as set out within the LVRPA’s various representations on the draft Local Plan process.

¹ To be confirmed

The principle of the proposed allocation of the Site for Industrial uses is fully supported by the LVRPA. This reflects the evidence base undertaken by the Council in preparation of the new Local Plan. The identified need for additional employment floorspace is set out within the Council's evidence base, with the Employment Topic Paper (March 2024), identifying a need of 304,000sqm of industrial and logistics floorspace within the Plan Period (2019-2041).

The Site Allocation Topic Paper (March 2024) provides further justification for the allocation of the Site for industrial and logistics uses as follows:

"The site sits within the UK Innovation Corridor, would form a logical extension to the nearby SIL and is an attractive location for logistics (with good access to the strategic road network). This 12 ha site, immediately south of the M25 and with good connections to Junction 25, is an excellent location for a large logistics scheme, similar to those immediately adjacent at Freezy Water (Mollison Avenue) to the west and Innova Park to the south. Redevelopment can provide at least 70,200sqm of new employment floorspace (light industrial, general industrial, storage and distribution, and related sui generis) floorspace in a strategically connected location to the M25."

And:

"It is an excellent location for employment use given the high quality road transport links and the proximity to neighbouring established industrial locations which makes its relative deliverability, a key challenge with employment allocations nationally, more certain, particularly over the short term."

The LVRPA re-affirms the in-principle support for the allocation of the Site for industrial and logistics employment uses.

iii) Review of Allocation Requirements and Design Principles

Table C1.177 of Appendix C – Draft Site Allocations document sets out the site specific criteria which inform the detailed allocation of the Site for employment uses.

This confirms, inter-alia, that the Site extends to 12.01ha, is located within Flood Zone 1, has a PTAL rating for 1a and is located within an Archaeological Priority Zone.

The draft allocation within the Regulation 19 consultation document is more prescriptive in relation to a number land use requirements and design criteria than the Regulation 18 draft allocation for Rammev Marsh West. This includes the identification of a minimum of 70,200sqm of floorspace to be delivered on site, timescales for the delivery of the scheme that is to be delivered on the Site, and various site specific design and land-use criterion that must be satisfied for any proposals on the Site to be compliant with the draft allocation. These are considered in further detail below.

A) Land Use Requirements - Floorspace

The draft allocations states that:

“redevelopment should provide at least 70,200sqm of new employment floorspace (light industrial, general industrial, storage and distribution, and related sui generis) floorspace.

LVRPA agree that the Site is able to provide a significant contribution towards the identified employment floorspace need in the borough within the Plan Period.

LVRPA have reviewed the evidence base, and the historic representations relevant to this Site and the draft allocation. The floorspace figure of 70,200sqm set out within the draft allocation is derived from Table 8 of the Enfield Employment Topic Paper (EETP) (March 2024), which states that based on 65% development plot ratio, the Site is capable of providing 70,200sqm industrial and employment floorspace.

The LVRPA would highlight that the Regulation 19 draft site allocation includes a number of detailed design principles and land use requirements (that did not form part of Regulation 18 draft site allocation) which will serve to reduce the developable area, and consequently the quantum of floorspace that can be delivered on site, if maintaining the identified 65% development plot ratio.

These design principles include the creation of a new public open space along the Small River Lea with additional tree planting, reinforcement and maintaining of existing green buffers along Mollison Avenue, the Small River Lea and the railway line and delivery of ecological enhancement throughout the Site, including contributing positively to the Metropolitan SINIC. An extract of the Site Allocation Map is provided below, with the various green shading identifying areas for retention, enhancement and creation of new green and public open spaces.



Allowing for the provision of new public open space adjacent to the Small River Lee and a green buffer around the Site of the approximate size indicated on the plan above, would reduce the developable area from 12.01 hectares to 7.70 hectares.

In addition, further detailed work is being undertaken in relation to the ground conditions of the Site, given its historic use as a landfill. This work is ongoing, and it is not known at this stage whether the ground conditions investigation works will highlight any further concerns regarding the buildability of the Site, and potential implication on quantum of floorspace that can be delivered on this site.

The LVRPA would therefore suggest that the policy wording is amended to allow for an element of flexibility in relation to the quantum of floorspace that is to be delivered, taking into account the detailed design principles criteria set out within the draft site allocation but also other presently unknown site constraints (such as ground conditions, highways capacity modelling etc), to ensure that the identified minimum floorspace is indeed deliverable, and commercially viable.

The LVRPA therefore suggests that Table C1.177 is amended to include an updated developable site area reflecting the above referenced design principles, and not only the wider site area of 12.01ha, as this no longer reflects the developable site area, and the Proposal text be amended to read as follows:

“Land Use Requirements:

Redevelopment should seek to maximise the quantum of new employment (light industrial, general industrial, storage and distribution, and related sui generis) floorspace.

Site floorspace capacity of at least 70,200 sq. m of new employment floorspace is identified within the Council’s Employment Topic Paper (March 2024), reflecting historic assumptions relating to developable site area and a target development plot ratio of 65%.

Development proposals should therefore seek to achieve a 65% development plot ratio reflecting the developable site area, site specific constraints and opportunities.

This site lies within the Lee Valley Regional Park Authority area. Regard must be had to the proposals and policies within the Park Development Framework (2019) and associated documents in assessing any planning application on this land.”

Notwithstanding the above, the LVRPA support maximising efficiency and quantum of commercially viable floorspace that can be delivered at Rammey Marsh West, taking into account the site specific constraints associated with the historic use of the site as a landfill, as well as balancing the requirements of the design criteria included within the draft RUR.03 allocation.

B) Design Principles

The draft allocation includes a number of detailed and prescriptive design principles. LVRPA are fully supportive of the allocation coming forward, and in order to ensure that a commercially viable development can be brought forward on this Site, the LVRPA suggests the introduction of minor elements of flexibility to the below design criteria as set out below, with new text highlighted in bold.

Design Criteria C – proposed amendment:

“C. must create a new public open space along the Small River Lea with additional tree planting and biodiversity enhancements. Details of this new public open space and enhancement is to be agreed with relevant stakeholders, including the LVRPA”

The proposed amendment will ensure appropriate engagement with relevant stakeholders, including the LVRPA, who manage the wider Rammey Marsh, is undertaken, and forms part of the wider considerations of the redevelopment of the Site.

Design Criteria D – proposed amendment:

“D. should provide streetscape improvements along Mollison Avenue and the roundabout, for example wider footpaths, trees, planting, and the incorporation of street furniture, where feasible.”

The proposed amendment will allow for appropriate level of flexibility, to allow for any relevant street scape improvements to be considered in detail as part of any future application proposals that may come forward on the Site.

Design Criteria E – proposed amendment:

“E. must create active frontages and high levels of visual permeability at ground floor along key routes, reflecting the nature and function of industrial and logistics buildings, and their operational requirements.”

The suggested amendment seeks to place the aspiration for active frontages in the context of the allocation of the site for industrial and logistics uses. Whilst there is an element of active frontage to industrial and logistics buildings, particularly around the office and reception areas, it is important to highlight within Design Criteria D, that the active frontage aspirations should reflect the proposed industrial and logistics use of the Site.

Design Criteria F – proposed amendment:

“F. Must locate yard and loading spaces away from the street edge, where feasible.”

The proposed amendment is suggested to allow flexibility around the potential design and layout of the Site. On the basis that detailed design work has not yet been undertaken, it is not considered

appropriate at this stage to impose detailed operational design criteria that could impact on the deliverability and operational effectiveness of a potential development. Whilst the LVRPA support the broad aspirations of this design criteria, an element of flexibility is required to allow for further site assessment and design to be undertaken.

Design Criteria I – proposed amendment:

"I. Must consider the impact of the proposal on local amenity, and decrease building heights towards the south west of the site to minimise impact on neighbouring lower rise existing buildings to the south west of the site."

The suggested amendment would reflect the broader aspirations of the Council, ensuring that any proposed development will consider the impacts of the proposed development on any adjoining sensitive receptors, including residential uses. The text as currently drafted is considered to be overly prescriptive given the early stages of this proposed draft allocation.

Design Criteria K – proposed amendment:

"K. should provide limited parking to promote active travel, taking into consideration staff and operational parking requirements of industrial and logistics users, as well as the site's PTAL 1a rating."

The proposed revision reflects the poor PTAL rating of the Site, and poor existing public transport connections. Any proposals on the Site will need to reflect operational and occupational tenant requirements. The LVRPA supports the intensification of the site, and maximising the quantum of deliverable floorspace on the Site, however the quantum of car parking will need to reflect the commercial requirements and expectations of prospective tenants and operators.

Design Criteria L – proposed amendment:

"L. ~~must provide~~ Pedestrian and vehicular access from Mollison Avenue roundabout and a secondary pedestrian access point on Mollison Avenue to be informed by further detailed highways capacity and junction modelling."

The proposed amendment will allow for the necessary technical and capacity assessments to be undertaken to determine the optimum way that the site can be accessed by a mix of methods of transport, and the number of access points that may be necessary to accommodate the proposed industrial and logistics uses on the Site.

iv) Timescales and Phasing

The allocation sets an approximate estimated implementation timeframe of 5-10 years. It is the LVRPA's view that the site could come forward within a shorter time-frame, and fall within the 0-5

years implementation timeframe. This would allow the socio-economic benefits associated with the proposed development realised within a more immediate timeframe.

This also reflects the findings of the EETP, which states at paragraph 3.49 that *“these sites [including Rammey Marsh West] have the potential to come forward early in the plan period.”*

The LVRPA would therefore support an amendment to the draft site allocation to bring forward the implementation timeframe to 0-5 years timeframe.

v) Closing

The LVRPA supports the proposed allocation of the Rammey Marsh West site for industrial and logistics uses. The representations include suggested revisions to the draft allocation wording to reflect the site specific constraints and opportunities that the Site presents.

The above representations are submitted to assist the Council with the preparation of the Local Plan process, and the consideration of the draft allocation.

LVRPA are happy to discuss the above allocations with London Borough of Enfield, and would welcome a meeting to discuss further the draft Rammey Marsh West allocation.