

**MATTER 3 –
EMPLOYMENT LAND
NEED AND SUPPLY**

**ENFIELD LOCAL PLAN
EXAMINATION**

Land to the South of William Girling Reservoir

Hearing Statement by Carter Jonas

On Behalf of Thames Water

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Carter Jonas

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Client: Thames Water

Job Number: J0060455

Contact: Jenny Turner (Associate Partner)

One Chapel Place
London
W1G 0BG
T: 020 7518 3200

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1.0 INTRODUCTION

- 1.1 This Statement has been prepared on behalf of Thames Water, the owner of Land to the South of William Girling Reservoir. Thames Water has engaged in the Local Plan process to date and has sought to provide comments on the legal compliance and soundness of the draft Local Plan from the outset.
- 1.2 Thames Water supports, in-principle, the Plan-led system. In order for a Plan-led system to function it requires Local Plans to be not only legally compliant and sound, but for them also to be deliverable, proportionate and based on clear evidence.
- 1.3 The National Planning Policy Framework (NPPF) confirms that Plans will be sound if they are positively prepared, justified, effective and consistent with national policy. For the reasons identified in the representations, which we will expand on, the Plan accords with some of these requirements.
- 1.4 Land to the South of William Girling Reservoir (the Site) extends to approximately 35 acres and constitutes a lawful waste use site and previously developed land. The northern part is in operational use for waste recycling and includes large mounds of recycling material and associated buildings and roads. The southern part is currently used by North London Waste Authority as a contractor's depot as part of the Development Consent for the North London Heat and Power Project.
- 1.5 The Site is sandwiched between open space and residential development to the east, the A406 (North Circular) to the south, industrial uses to the west, and the reservoir and open space to the north. The Site is previously developed land in the Green Belt.
- 1.6 As part of the emerging Local Plan process, Thames Water has sought a site allocation for the Site for Strategic Industrial Land that would be suitable for future water infrastructure/utilities development or alternative industrial use. A comprehensive development strategy for the Site could also enable improvements to public access/open space and biodiversity net gain.
- 1.7 Thames Water has made representations to each stage of the Local Plan process. For clarity, this has included representations to:
 - Issues and Options Consultation – February 2019;
 - Preferred Approaches Consultation – September 2021; and
 - Draft Local Plan Consultation – May 2024.
- 1.8 This Hearing Statement expands on the issues identified within the representations relating to employment land need and supply. It considers the implications of the revised NPPF published on 12th December 2024.

2.0 MATTER 3 – EMPLOYMENT LAND NEED AND SUPPLY

Issue 3.1 – Whether the assessment of overall employment land need and requirement is justified, positively prepare, consistent with national policy and in general conformity with the London Plan

Question 3.1: Are the requirements for additional floorspace justified and based on robust and up-to-date evidence of need?

- 2.1 Yes. The Borough’s Employment Topic Paper dated March 2024 provides an overview of the work that has been commissioned to support the additional floorspace needed for industrial, warehousing and logistical use.
- 2.2 Thames Water understands there have been four Employment Land Review assessments since 2018, with the most recent published in 2023. This work appears robust, with the latest assessment undertaken a good while after the Covid pandemic which had a significant impact on consumption, need and supply.
- 2.3 Thames Water therefore considers that the evidence base justifying the amount of employment space is sound.

Question 3.2: Do the requirements appropriately reflect the quantitative and qualitative need for those forms of development over the Plan period?

- 2.4 No. The NPPF confirms the planning system has an important economic overarching objective which is to build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity (paragraph 8). For plan-making, this means the promotion of growth and it is made clear that forecast needs are not a maximum figure, indeed it is the opposite. It states that “*strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas*” (paragraph 11).
- 2.5 Thames Water supports the preferred strategy for industrial development, confirmed as to meet the Borough’s industrial and logistics needs in the urban area and selected Green Belt sites. However, it is considered there is a need to allocate additional industrial land at sites in the Green Belt beyond those identified in the draft Local Plan. This is necessary in order to meet Borough’s employment land requirements, to provide the additional capacity, which is beyond the currently identified needs, and to provide adequate flexibility to address future changes in circumstances.
- 2.6 The Borough’s Employment Topic Paper (2024) outlines at Chapter 5 that an engagement session was organised with logistic stakeholders in August 2023 and some of the key insights were:
 - *“the lack of supply poses a challenge, resulting in rising rents”.*
 - *“the current pipeline is notably constrained particularly for developing modern ‘best in class’ facilities”*
 - *“the scarcity of supply had sparked increased interest in intensification as a compromise solution”*
- 2.7 The Employment Topic Paper outlines that there is a need for 304,000sqm of industrial space for the period 2019-2041. Paragraph 3.43 of the report states that total brownfield supply of 305,315sqm slightly exceeds the identified need of 304,000sqm industry and logistics space. However, this is only 1,315

sqm in excess, which is 0.4% over the identified need. Given that 200,000sqm is identified as 'potential supply' from brownfield sites there is a lot that can affect the ability of that land to come forward for intensified industrial use be that lease, ownership, viability or contamination issues, amongst other commercial issues.

- 2.8 Three Green Belt sites are proposed for release from the Green Belt for industrial purposes including Kennet Property's (wholly owned subsidiary development company within Thames Water group) Land to the North West of Innova Park (ref SA RUR.05).
- 2.9 The Employment Topic Paper (March 2024) at paragraph 3.50 outlines the issues and complexities of delivering the 30,550sqm Land East of Junction 47 site (site allocation ref SA RUR.04). This site sits within the open countryside and forms part of a wider site within Hertsmere District Council. The development of Land East of Junction 47 will be dependent on Hertsmere's local plan timetable and their willingness to release their portion of the site from Green Belt designation. It is therefore considered a long-term prospect by Enfield. Thames Water considers the inclusion of this site as a draft allocation to provide such a large amount of industrial space as high risk, as its delivery is questionable and it is wholly dependant on third party actions and decisions. Thames Water questions if the inclusion of site allocation reference RUR.05 is sound.
- 2.10 Furthermore, Land East of Junction 47 is agricultural land. Paragraph 148 of the revised NPPF published on 12th December, outlines that during a Green Belt review grey belt land should be given priority before considering other Green Belt non developed land. It is unclear whether this required assessment has been undertaken by the Council. Land to the South of William Girling has less impact on the five purposes of the Green Belt than a greenfield agricultural site, as outlined below.
- (a) to check the unrestricted sprawl of large built-up areas
- 2.11 The Site is adjacent to the built-up area and is previously developed. There is no distinction between the Site and the urban area. The Site's contribution to this purpose is weak.
- 2.12 This compares to developing a greenfield agricultural land site for industrial use which would introduce sprawl within the open countryside. Such a site would have a strong contribution to checking the unrestricted sprawl of large built-up areas.
- (b) Prevent neighbouring towns merging into one another
- 2.13 The urban use of the Site means it is indistinguishable from the built-up area and there is no distinction between the Site and the urban area. The Site's contribution to this purpose is weak.
- 2.14 This compares to developing a greenfield agricultural land site for industrial use which would introduce new built form within the open countryside. Such a site would have a moderate contribution to neighbouring towns merging into one another.
- (c) Assist in safeguarding the countryside from encroachment
- 2.15 The Site is a waste recycling facility and a site compound. This is an inappropriate use in the Green Belt. The Site is developed, it is not countryside. The waste and recycling centre is an urban use that is indistinguishable from the built-up area around it and therefore the Site serves a very weak contribution to safeguarding the countryside from encroachment.
- 2.16 This compares to developing a greenfield agricultural land site for industrial use which would introduce new built form within the open countryside. Such a site would have a strong purpose to protecting the countryside from encroachment.

(d) Preserve the setting and special character of historic towns

- 2.17 The release of Site from Green Belt will not have any detrimental impact on the setting and special character of a historic town. The Site does not have a contribution to this purpose.
- 2.18 Similarly, developing a greenfield agricultural land site for industrial use would not serve a contribution in relation to preserving the setting and special character of historic towns.

(e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land

- 2.19 The release of this Site from the Green Belt would assist with the recycling of this land that is effectively part of the urban area.
- 2.20 This compares to developing a greenfield agricultural land site for industrial use which would result in new development on greenfield land.

Summary

- 2.21 The above assessment demonstrates that the William Girling Site has a much weaker contribution to the five purposes of the Green Belt, compared to a greenfield agricultural site which is currently identified as a site allocation (reference SA RUR.04).
- 2.22 Thames Water considers that Land south of William Girling has a much more realistic prospect of development for industrial use. It is located within the southern part of the borough, adjacent to existing industrial uses and is previously developed. It does not strongly contribute to Green Belt purposes (a), (b) or (d) as stated at paragraph 143 of the NPPF, and as demonstrated above at paragraphs 2.11-2.14 and 2.17. The William Girling Site should therefore be considered for designation for industrial use before other non grey belt Green Belt land.

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