



**Places for London
Property Development**

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Annette Feeney
Programme Officer
Planning Inspectorate

Sent by email

Dear Annette

Examination of the Enfield Local Plan 2019-2041
IN2: Stage 1 – Matter 4 - questions 4.7 and 4.8

Thank you for providing the opportunity to provide a written statement on the draft Enfield Local Plan.

We are pleased to provide written statements relating to Matter 4: Green Belt, questions 4.7 and 4.8.

This statement principally relates to TfL owned land at site allocation SA RUR.03: Land West of Ramney Marsh). We strongly support the proposed de-designation of the site and its proposed allocation for employment floorspace. We welcome the opportunity to provide further more site specific written statements on the proposed site allocation in due course.

Please note that the views expressed in this letter and our site submissions are those of Places for London planning team in its capacity as a significant landowner and developer only, and do not form part of the Transport for London (TfL) response in its role as transport operator and highway authority in the area, which has been issued separately.

Places for London

Places for London is TfL's financially independent property company. Places for London provides space for over 1,500 businesses in TfL stations and railway arches and on London's high streets. And now, it's working to release more of the untapped opportunity in TfL's property portfolio to deliver much-needed new homes and jobs to create places for Londoners to live, work and play which are sensitive to local needs and communities and improve access for all. We are a significant landowner within the borough.

Question 4.7 is there a quantitative need to remove land from the Green Belt to ensure identified need for additional industrial and warehousing floorspace can be met by 2041?

Places for London believes that the 2024 employment land review which forms part of the evidence base for this Local Plan is very clear that there is a quantitative need for land to be removed from the Green Belt to ensure that identified need for industrial and warehousing floorspace can be met within the plan period.

This is supported by the Employment Land Review (2024) which forms part of the evidence base. In the Industrial and Logistics section of this report, Paragraph 10.78 concludes that *“Releasing Green Belt would appear to be the only route to demonstrating a plan period supply.”*

Paragraph 10.79 of the review states that it has been established that *“around 70ha. of land needs to be redeveloped and intensified to address a 124,556 sqm shortfall (in industrial and warehousing floorspace) – assuming 70ha. of land moves from 40% to 65% plot ratio.”*

Paragraphs 10.80 and 10.81 of the review is clear that identified non-green belt sites for industrial intensification will not be enough to meet demand for industrial and warehousing floorspace through the plan period.

Paragraph 10.82 states that *“If all the Green Belt sites set out in the ELR are allocated, and developers work to a 65% plot ratio, the Borough can meet its economic needs”*

The above evidence is clear that there is a quantitative need to remove land from the Green Belt to ensure that identified need for additional industrial and warehousing floorspace can be met within the plan period to 2041.

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Question 4.8 Overall, are there exceptional circumstances in principle to justify altering Green Belt boundaries for A) Housing and B) Employment Development?

There is no definition of the policy concept of "exceptional circumstances". Whether any particular case can be treated as an exceptional circumstance is a matter of planning judgement.

Enfield's Green Belt Exceptional Circumstances Topic Paper (2024) is part of the evidence base for the Local Plan. This identified that previous case law (Calverton Parish Council v Greater Nottingham Councils) sets out the planning judgment that are involved in the consideration of exceptional circumstances. These include but are not limited to:

- i. the acuteness/intensity of the objectively assessed need.
- ii. the inherent constraints on supply/availability of land
- iii. The consequent difficulties in achieving sustainable development without impinging on the Green Belt;
- iv. the nature and extent of harm to this Green Belt

V. the extent to which the consequent impacts on the purposes of the Green Belt may be ameliorated or reduced to the lowest reasonable practicable extent.

The Enfield topic paper considers exceptional circumstances for employment development in the Green Belt. It identifies that without the release of Green Belt land (including TfL land at site allocation SA RUR.03: Land West of Ramney Marsh) the acute need for employment space and particularly industrial and logistics space cannot be met within the plan period as evidenced in the employment land review. The Topic Paper and employment land review also identify that intensifying existing employment sites which are not within the Green Belt will not meet the identified need for employment space.

The Green Belt sites which have been selected for potential release for employment land includes SA.RUR.03 land west of Rammey Marsh. The release of this site would as recognised in the 2021 Green Belt Land Review, cause a low level of harm to the Green Belt. This site would qualify as Grey Belt land using the definition set out in the most recent National Planning Policy Framework.

Places for London agree with the topic papers conclusion that the acute need for plans economic ambitions can only be achieved with the release of Green Belt land and therefore exceptional circumstances may, in principle, apply.

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Yours faithfully



Andrew Russell
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