



# The Enfield Society

*conserving our heritage and environment*

Enfield Local Plan Examination

## **Matter 3: Employment Land Need and Supply**

This written statement refers to the following representations [01794-1-1 \(hyperlink\)](#) especially Policies SS1 para 4 (p9) and E1 p57-8.

### **Q3.1: Are the requirements for additional floorspace justified and based on robust and up-to-date evidence of need?**

SS1: Spatial Strategy paragraph 4 (p27) states that *“to meet the Borough’s identified economic needs this plan will provide for a minimum of:*

- 304,000 sqm of net additional industrial and logistics floorspace; and
- 40,000 sqm of net additional office floorspace.”

Paragraph 5 then goes on to identify that this need will be met through new logistics hubs close to Junction 24 of the M25 (RUR.04) and close to the M25 north of Innova park (RUR.05) but in error omits *RUR.03: West of Rammey Marsh*, the largest of the proposed new employment sites. All three sites would require release of Green Belt.

#### **304,000sqm industrial and logistics floorspace**

This figure is derived from the *Employment Land Review* figures by Stantec (document library EMP1 [link here](#)) by adding together projections based on 5-year past trends for a) core industrial (Table 7.13) and b) warehouse floorspace (Table 7.14).

However, as stated in paragraph 7.72, 2015-2019 was a period of accelerated growth that generates an *“extreme floorspace demand that does not accord with any other approach nor is it reflective of the market”*. Furthermore, as stated in paragraph 7.44 *“the property market assessment does suggest that the very rapid growth rates seen in this ‘short’ past trend are unlikely to repeat in the future, and this fast growth should not be treated as normal and should not be projected forward in the Plan.”* Paragraph 7.45 states that *“the move away from the high street to online and warehouse-based deliveries can happen only once, and this paradigm shift in the way goods are ordered and deliver has largely taken place and will not repeat.”*

Given the above assessment, it is unclear why a five-year period 2016-2021 (as shown in Table 7.3 on p73) would be more robust, given that the period includes four out of the five years that were considered to represent *“extreme floorspace demand.”*

In light of this, the decision to select a ‘need’ figure aligned to what Stantec admits in paragraph 7.74 is *“the most optimistic view of future floorspace growth”* is not justified.

Rather than selecting an unduly optimistic figure, it would be more robust to take a longer-term view. According to Table 7.14 (p83) the 10-year trend-based projection for warehousing is 102,553sqm gross demand. Added to the 10-year trend for industrial floorspace (42,123sqm, Table 7.14 p82) gives a total of **142,833sqm** combined gross demand for industrial and warehouse floorspace in the period 2019-2041, or  $(1915 + 4661) = \mathbf{6,576sqm \text{ per annum}}$ .

As set out in our hearing Statement regarding Q1.1, the Council has an interest in demonstrating higher need figures because this helps to justify its Green Belt plans, to achieve its corporate objective of achieving £800million through the sale of Green Belt land in its ownership, both inside Enfield and beyond its boundaries. Higher figures could be used to explain release of Green Belt at the very harmful site at SARUR.04, degrading the Green Belt function of land in Hertsmere Borough and

probably ultimately resulting in the loss of strongly performing Green Belt in that Borough and causing coalescence between London and Hertfordshire.

### **40,000sqm net additional office floorspace**

The figures in Table 7.5 (p74) show a loss of office employment floorspace for each of the past five years. It does not appear that there is a quantitative or qualitative need for new office floorspace in Enfield.

### **Q3.2: Do the requirements appropriately reflect the quantitative and qualitative need for those forms of development over the Plan period?**

See our response to Q3.1 above.

### **Q3.3: Are the requirements for additional floorspace consistent with the expectations of the London Plan?**

London Plan [Policy E1: Offices](#) identifies agglomerations in specific locations set out in Part C and D. This does not support office development on the scale envisaged in the Enfield Local Plan, unless this can be defined as local office provision within town centres.

The provisions of London Plan [Policy E4: Land for industry, logistics and services to support London's Economic function](#), does not indicate any specific additional floorspace requirements. However, when read in the context of the overarching London Plan 'Good Growth' principles in Chapter 2 and restrictions on the use of open space (Policy GG2 part F and Glossary) it is clear that the London Plan does not expect release of open spaces in order to provide additional employment floorspace. Whilst paragraph 7.73 of the Employment Land Review states that distribution warehouses and industrial uses share common characteristics, the London Plan [Policy GG5: Growing a good economy](#) (part G) makes clear that plans must make the fullest use of public transport, walking and cycling network to support agglomeration, rather than promoting stand-alone isolated new employment sites. The requirement in E4 part A to "*take account of local employment land reviews*" is not a justification for ignoring the core 'good growth' approach.

In light of the specific quantitative requirements in the London Plan, the policy context is established by the London Plan "Good Growth" Spatial Strategy as expressed in the Key Diagram. That prohibits new employment sites on open Green Belt countryside. It would also undermine the basis for strategic planning across London for Enfield to encourage an *ad hoc* approach to using Green Belt countryside when there could well be other more suitable locations elsewhere in London, including brownfield or 'grey belt' opportunities aligned with the "Good Growth" principles that go unutilised.

**TOTAL 947 WORDS**