

## **MATTER 4 – GREEN BELT**

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# **ENFIELD LOCAL PLAN EXAMINATION**

**Land to the South of William Girling Reservoir**

**Hearing Statement by Carter Jonas**

**On Behalf of Thames Water**

**January 2025**

**Carter Jonas**



**Date: January 2025**

**Client: Thames Water**

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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.
- 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) and to the north of Meridian Water, 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 being 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, employment 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 as 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 Representations have been made 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
  - Regulation 19 consultation – May 2024.
- 1.8 This Hearing Statement expands on the issues identified within the representations relating to the Green Belt. It considers the implications of the revised NPPF published on 12<sup>th</sup> December 2024, and particularly the introduction of grey belt Green Belt land.

## 2.0 MATTER 4 – GREEN BELT

**Issue 4.2: Whether removing land from the Green Belt as proposed in the Plan necessary to ensure that the identified need for housing and employment development can be met in a way that promotes sustainable patterns of development.**

**Removing land from the Green Belt to provide land for housing and employment development**

**Question 4.5: In selecting the locations to be removed from the Green Belt, was first consideration given to land which has been previously developed and/or is well served by public transport?**

- 2.1 Thames Water consider the council did consider previously developed land first but that some developed sites in the Green Belt were incorrectly assessed and dismissed, such as Land to the South of William Girling Reservoir. Furthermore, since the publication of the revised NPPF on 12<sup>th</sup> December 2024, Paragraph 143 sets out a requirement for plans to consider grey belt Green Belt sites for release first, before other Green Belt locations.
- 2.2 Land to the South of William Girling Reservoir is one such grey belt site. It is suitable for employment use but is currently in the Green Belt. It is previously developed land that is in use to the north as a waste recycling site and, to the south, as a contractor's depot. The Site was assessed in the Green Belt Review (2023) as a mineral extraction site, but this is incorrect. The Site is a significant space that is relatively open and operates as a waste use.
- 2.3 The Site has direct access to the strategic road network (North Circular) which would provide sustainable access for future logistics and warehousing uses. It also has the potential for transport by rail and water being adjacent to the River Lee Navigation. The Site is very close to the existing employment area at Eley Industrial Estate, evidencing that the general area is suitable for industrial and warehousing uses.
- 2.4 Thames Water considers Land to the South of William Girling Reservoir could be grey belt. The NPPF definition of grey belt is land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143. 'Grey belt' excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development.
- 2.5 The Site is previously developed land. The Site is not in a designated area or asset as outlined in footnote 7 of the NPPF, except the Site is liable to some flooding.
- 2.6 The Site does not strongly contribute to Green Belt purposes (a), (b) or (d) as outlined at paragraph 143 of the NPPF. This is considered below.
 

Purpose (a) - To check the unrestricted sprawl of large built-up areas
- 2.7 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.
 

Purpose (b) - Prevent neighbouring towns merging into one another
- 2.8 The urban use of the Site means it is indistinguishable to the built-up area and there is no distinction between the Site and the urban area. It serves a weak contribution to this Green Belt purpose.

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

- 2.9 The release of the 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 Green Belt purpose.
- 2.10 Overall, the Site serves a weak function to purposes (a), (b) and (d) of the Green Belt.
- 2.11 Thames Water contend that that this Site should be considered before other greenfield Green Belt land, such as site allocation reference SA RUR.04 (Land East of Junction 24) which is agricultural land. Land to the South of William Girling has less impact on the five purposes of the Green Belt than an agricultural land site, as outlined at Paragraphs 2.10-2.21 of the Matter 3 (Employment Land Need and Supply) Hearing Statement prepared by Carter Jonas.
- 2.12 The 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 (ref SA RUF.04). Thames Water considers that the William Girling Site should be the preferred choice for a Strategic Industrial Use allocation.

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

- 2.13 Yes. The Employment Topic Paper (2024) outlines that there is a need for 304,000sqm of industrial space during 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 could affect the ability of that land to come forward for intensified industrial use be that lease, ownership, viability, contamination, or other commercial issues.
- 2.14 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 site (ref SA RUR.05).
- 2.15 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.
- 2.16 As stated at paragraphs 2.2-2.4 above, Thames Water considers that Land to the South of William Girling has much greater certainty of delivery for industrial use. It is located within the southern part of the borough, adjacent to existing industrial uses and is previously developed land that could be considered grey belt.

## **Q4.8: Overall, are there exceptional circumstances in principle to justify altering Green Belt boundaries for a) housing and b) employment development?**

- 2.17 Yes. It has been evidenced in the Employment Evidence Paper (2024) that there is significant need for high quality modern industrial and warehousing space in Enfield. The Employment Evidence Paper outlines that consultation with logistics stakeholders was undertaken in 2023 which demonstrated there is significant need and lack of supply of high-quality industrial space, which is causing rents to rise.

- 2.18 The employment evidence paper identifies that there is insufficient brownfield sites to accommodate the identified needs for employment. Therefore, the release of Green Belt sites in sustainable locations should be considered. In line with the revised NPPF after previously developed sites, grey belt sites should be considered before other Green Belt locations.
- 2.19 Thames Water contends that Land to the South of William Girling should be allocated for industrial use and removed from the Green Belt.

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