

WH/381/130/1

8 September 2021

Strategic Planning & Design  
Enfield Council  
NW1 3BR

Submission via email: [Localplan@enfield.gov.uk](mailto:Localplan@enfield.gov.uk)

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LONDON  
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Dear Sir/Madam

**Re: Enfield Local Plan Main Issues and Preferred Approaches (Regulation 18) Consultation  
Representations on behalf of LaSalle Investment Management in respect of Trafalgar Trading Estate,  
Jeffreys Road, Enfield EN3 7TY**

We act on behalf of LaSalle Investment Management ('LaSalle') and have been instructed to submit representations to the above local plan consultation in respect of our client's interests at Trafalgar Trading Estate in Brimsdown Industrial Estate.

### **Background and Context**

LaSalle asset manages Trafalgar Trading Estate (circa 1.5ha) in Brimsdown Industrial Estate. It is an established trading estate, located to the northeast of the junction of Mollison Avenue and Jeffreys Road in the southern part of Brimsdown Industrial Estate. The site comprises 11 industrial/warehousing/trading units with dedicated yard and parking areas.

The site is designated as a Strategic Industrial Location ('SIL') in the adopted Local Plan and the London Plan (2021). The London Plan designates the Lee Valley area, in which Trafalgar Trading Estate is located, as an Opportunity Area. It recognises that the Lee Valley is ideally located for freight and logistics, and will continue to play an important strategic role in providing industrial and logistic function to support the wider London economy and contribute to local employment.

As set out in our client's previous representations to the Local Plan consultation in February 2019, LaSalle's objective is to ensure that Trafalgar Trading Estate is fully occupied and remains commercially viable in future. As such, they invest in ongoing maintenance and improvements to the site as necessary to meet the market demand and to maintain its attractiveness to existing and future occupiers. Our client's objective is consistent with the site's designation as a SIL. The representations set out in this submission are made in this context.

### **Site's Designation**

We support the continued designation of Trafalgar Trading Estate as a SIL, as it reflects the current operation and function of the site.

## **Strategic Policy SP**

### **Policy E5 (Transforming Strategic Industrial Locations and Locally Significant Industrial Sites)**

The policy supports the intensification of industrial uses within SILs, subject to criteria including a requirement (point 2d) to engage with existing businesses to seek to retain them on site where possible, to implement effective transitional arrangements and to provide support for any businesses that cannot be incorporated to relocate off site. We object to this requirement, as commercial leases and arrangements dealing with specific occupiers are a matter of commercial considerations. It should categorically be outside of planning control which concerns with land use (rather than specific occupiers/businesses). Furthermore, this requirement will place a significant financial and practical burden on the landowners and developers, and consequently undermine the deliverability of development proposals. We therefore request that point 2d is deleted.

## **DM Policies**

### **Policy SE2 (Sustainable design and construction)**

We object to the policy which requires all developments, including change of use and refurbishments, to submit a sustainable design and construction statement setting out how sustainable design principles have been integrated into design-led approach. LaSalle is committed to improving sustainability of its portfolio when existing assets are going through a major refurbishment or redevelopment. However, it is not always financially viable to retrofit sustainable construction measures through minor refurbishments or a change of use. We are therefore concerned that the blanket requirement could make minor refurbishments and change of use applications unacceptable. We request that the requirement applies only to major new developments and excludes change of use and refurbishment.

### **Policy SE3 (Whole-life carbon and circular economy)**

All major development proposals are required to provide a circular economy statement and calculate whole life-cycle carbon emissions. Proposals which are minor in nature (e.g. a refurbishment of façade) or change of use would be categorised as major developments based on the site area. As such, the trigger should be amended so that the policy requirements would apply to major development proposals resulting in the creation of 1000sqm or more of new floor area (in the case of non-residential development).

### **Policy SE4 (Reducing energy demand)**

The policy requires all developments including any commercial scheme comprising 500sqm or more (including change of use, conversion and major refurbishments) to meet space heating demand targets and operational energy use targets (criteria 1 and 2). We object to these requirements as the thresholds are such that meeting the requirements may not be practically feasible or viable for change of use, conversion and refurbishment proposals.

We object to criterion 4 which requires all major development including change of use, conversions and major refurbishments to evaluate the operational energy use using realistic information on the intended use, occupancy and operation of the building to minimise any performance gap. The policy should recognise whether it is appropriate to apply the requirement based on the nature and scale of the development, feasibility and viability.

## Policy SE5 (Green gas emissions and low carbon energy supply)

Policy requires all developments (including change of use, conversions and major refurbishments) to provide an energy statement and achieve carbon reduction as far as possible and to be net-zero carbon. The policy should recognise feasibility and viability considerations in order to ensure that the policy requirements do not compromise the delivery of refurbishments and change of use on existing industrial sites.

### Conclusion

Our client wishes to ensure that there is an appropriate policy framework to facilitate the maintenance and improvements to Trafalgar Trading Estate so that it can continue to contribute to the objective of the site's designation as a SIL. However, we are concerned about policy requirements which could make such proposals unviable or undeliverable. We therefore request that our concerns are taken into account in the preparation of the next consultation document.

We would be grateful for acknowledgement of receipt.

Yours sincerely

*Wakako Hirose*

Wakako Hirose (Sep 9, 2021 11:50 GMT+1)

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