

13 September 2021

Strategic Planning and Design
Enfield Council
Freepost NW5036
EN1 3BR

By email only: localplan@enfield.gov.uk

Dear Sir / Madam

Draft Enfield Local Plan 2039 (Main Issues and Preferred Approaches) Consultation

On behalf of our client, Universities Superannuation Scheme Limited (USS), we are writing to respond to the consultation on the Draft Enfield Local Plan 2039 (Main Issues and Preferred Approaches) published for consultation until 13 September 2021.

Background

USS owns the freehold of Enfield Retail Park, Crown Road, Enfield EN1 1TH ('the Site') and as such has an interest in emerging planning policy and proposed site allocations which affect the Site.

Draft Planning Policy Position

The Site is located in Southbury, an area occupied by retail parks and industrial parks, which acts as a key gateway into the Lee Valley, Ponders End and Enfield Town. *Draft Strategic Policy PL2: Southbury* sets out the vision for the upcoming development and placemaking for the area. The proposed vision seeks to introduce new residential-led mixed use development including some taller buildings (above 15 storeys) marking the area's role as a gateway to Enfield. It also seeks the intensification and co-location within the Great Cambridge Road Strategic Industrial Location (SIL) to provide local employment opportunities and renewed employment floorspace, together with proposed SIL extension areas. It is understood that a spatial framework or masterplan will be prepared as a Supplementary Planning Document in due course.

Draft Strategic Policy PL2 supports the provision of an appropriate mix of uses within Southbury such as employment, leisure, community and cultural uses. It identifies the potential for the creation of a new local centre through the phased release of the "retail park". This must include offsetting the reduction in any retail floorspace with the appropriate mix of uses. It is important to note that the policy wording itself does not set out which retail park it is referring to. It is thought that the reference is to the Colosseum Retail Park which is allocated under Site Allocation SA9 for mixed use; however, this should be clarified given the multiple retail parks within the Southbury area that are subject to an allocation.

We note that Enfield Retail Park has been allocated for Future Strategic Industrial Location Extensions on the draft Policies Map under *Draft Strategic Policy SP E2: Promoting jobs and inclusive business growth* within the wider Strategic Industrial Location.

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Draft Strategic Policy SP E2 seeks to support a growing and diversifying economy, enabling development in industrial areas, encourages sustainable economic growth by promoting job growth and supporting employment locations.

USS supports the principles of promoting sustainable economic growth and employment in general terms. However, USS is not supportive of the proposed allocation of Enfield Retail Park as a Future Strategic Industrial Location Extension at the present time (refer to Appendix 1 for the emerging Proposals Map). The assets on the park are presently subject to long leases and certainty needs to be provided to ensure that these businesses can continue to operate and be adapted to meet changing consumer demands. USS has not been consulted by Enfield Council regarding the proposed allocation of Enfield Retail Park as a Future Strategic Industrial Location Extension and there have been no discussions to date regarding the change of use of the retail park (to any alternative use) in the future.

USS welcomes future flexibility for the Site, however, this needs to be within the context of ensuring the ongoing successful operation of the Park at present and responding to potential future market changes. We therefore recommend that the draft Local Plan allocates the Site for future mixed use development, in the same way as the neighbouring retail sites (Sainsburys and Colosseum Retail Park), to provide flexibility and the opportunity to maximise the development potential of the Site in the longer term. The mix of uses should include both residential and commercial uses, including retail, to provide flexibility. The appropriate mix of uses should be explored through a future Masterplan or Strategic Regeneration Framework in due course to guide redevelopment principles. The proposed Future Strategic Industrial Location Extension allocation is not supported at the present time.

USS would welcome the opportunity of a meeting with Enfield Council to discuss emerging priorities for Enfield Retail Park in more detail, including any developments in the preparation of a Masterplan or Spatial Framework, to ensure the most appropriate allocation for the Site.

If you have any queries in regards to these comments, please contact Julia Krause (jkrause@deloitte.co.uk / +44 207 303 3744). In the meantime, I would be grateful if you could confirm receipt of this letter.

Yours faithfully

Appendix 1

Draft Enfield Local Plan 2039 (Main Issues and Preferred Approaches) Consultation Emerging Proposals Map 2021:

