



Strategic Planning and Design Team,
Enfield Council,
FREEPOST,
NW5036,
EN1 3BR

6 March 2020

Dear Sir/Madam,

BY EMAIL

New Local Plan, Call for Sites – Mollison Avenue, Waltham Cross, Enfield

We are writing to you on behalf of our client, Gazeley, in response to Enfield's Call for Sites request in preparation of their New Local Plan. This letter, together with the supporting drawings and technical information, promotes the land to north of Mollison Avenue, Waltham Cross (the 'Site'), for allocation as employment land for industrial warehousing (Use Class B1(c), B2, B8).

It is our contention that demand for industrial land capacity within Enfield vastly outstrips supply and that Enfield will be unable to deliver their requirements without the release of suitable Green Belt land. In this respect, the Site at Mollison Avenue is ideally located within the Upper Lea Valley Opportunity Area to contribute towards industrial and logistics requirements and deliver sustainable economic job creation.

This letter sets out the case for the Site's allocation in planning terms and should be read in conjunction with the Enfield Industrial Demand Report by JLL and the Highways and Transport Technical Note by MGCE. These reports are also supported by Masterplan options by RPS which demonstrate the form of development that could be achieved on the Site. When read together, this information makes evident that the site is achievable, viable, deliverable and is ideally located to make an important contribution to Enfield's economic strategy.

Gazeley

Gazeley are a leading developer, investor, owner and manager of prime logistics real estate in Western Europe. Our business is focused on France, Germany, Netherlands, Spain, Italy, Poland and the United Kingdom, the strongest logistics markets in Europe. We have industry leading capabilities across the whole value chain including Investment, Development, Asset management and Leasing. Gazeley have a proven track record of delivering 8.5 million sqm of warehouse space to a cross-section of industry customers.

In December 2017, Gazeley became part of GLP, the leading global investment manager specializing in logistics and related technology investments, with US\$66 billion of AUM in real estate and private equity

funds around the world and a portfolio of 75 million square meters (810 million square feet). GLP's funds are dominant in logistics globally with variety across the risk-spectrum. GLP currently manages three funds in Europe totalling more than €6 billion (US\$7 billion) AUM when fully invested.

Gazeley have a longstanding involvement in the London Borough of Enfield, originally developing out 230,000 square feet at Delta Park almost 20 years ago. Gazeley also acquired G-Park Enfield (the former ESAB site) in 2007 adjacent to the subject site at Mollison Avenue and subsequently delivered 151,000 square feet for Tesco and a further 100,000 square feet to meet market demand and let the building to Yodel. Gazeley are proud to have brought urban regeneration, new jobs and served customers in Enfield and London.

Industrial Land in Enfield

It is recognised within the Enfield Draft Local Plan and supporting evidence base that Enfield is ideally positioned between Central London and the London-Stansted-Cambridge Innovation Corridor. Gazeley agree with the Council's aspiration to take every opportunity to grow, innovate and diversify the economic base, whilst at the same time provide for associated land and premises to deliver the Borough's requirements for industry and infrastructure.

It is also recognised that Enfield are reviewing the type of economy to proactively target in order to ensure that the competition for land is allocated according to evidence and related to growth needs. In this respect, an Enfield Industrial Demand Report has been completed by JLL which sets out the demand and supply for industrial and logistics in the Borough. The report demonstrates that demand for industrial space has been very strong in Enfield but that there is very little supply in the pipeline to meet future demand. The evidence and insights provided by the report concludes that the Borough needs to add in extra opportunities for industrial land development which should build on locational advantages related to clustering, compatibility with the wider area and the utilisation of existing infrastructure. Support is therefore given to the Draft Local Plan's strategy to direct growth towards Strategic Industrial Locations and Opportunity Areas.

Enfield is a strategically important industrial location for London. It has the locational advantage and balance of infrastructure to enable businesses to adequately have access into London and beyond. It is these factors that support the Industrial Demand Report's evidence that demand for modern logistics is extremely strong. Indeed, the Draft Local Plan demonstrates that there is a contingent of larger business engaged in logistics and warehousing operations concentrated in the Upper Lea Valley. The Plan goes on to state in 6.2.4 that:

“The majority of employment land lies within Strategic Industrial Location (SIL) and several of the Locally Significant Industrial Sites (LSIS) areas remain the most suitable locations in Enfield for accommodating industrial and warehousing demand based on their characteristics and assessed quality for example, the excellent strategic road access to markets and supply chains, access to an appropriately skilled workforce, the size of industrial clusters, and the clear demarcation and separation from sensitive uses. Land is also occupied by wider industrial uses, which serve strategically important city functioning roles.”

Gazeley supports the principle that Strategic Industrial Locations are the most suitably located destinations to provide growth, however the evidence has shown that the intensification of existing sites will be insufficient to deliver the demand for industrial land. In order to support the necessary growth in the Borough, section 2.12.2 of the Draft Local Plan acknowledges that there “*are strong sustainability arguments in favour of developing some green belt land*”. In the circumstances, it is our assertion that the site at Mollison Avenue is ideally located directly adjacent to two Strategic Industrial Locations within the Upper Lea Valley and is therefore ideally positioned to accommodate the identified demand for logistics in Enfield.

Industry in the Upper Lea Valley

The Site is situated within the Upper Lea Valley Opportunity Area which has a clear directive to optimise development opportunities along the A10/A1010 Corridor with the ambition to deliver 15,000 new jobs across a range of industries.

The Upper Lee Valley is one of the largest areas of manufacturing and technology-led industry in London. Given its strategic position as a business and employment centre within the London-Stansted-Cambridge-Peterborough growth corridor, the area contains a significant amount of industrial land, much of which is designated as Strategic Industrial Locations (SIL). The Upper Lee Valley (ULV) also contains a number of Locally Significant Industrial Sites (LSIS) including two directly adjacent to the west and south of the Site.

Warehousing and distribution activities are the dominant sector in the Upper Lea Valley (26% of businesses). This sector generates a large amount of employment, almost 13,500 jobs or 34% of employment in the ULV. However, these uses tend to be space hungry, requiring large amounts of yard space for HGV access and thereby generating lower employment densities than other sectors. The predominance of large logistics and distribution type uses is reflected in the building stock, which tends to be larger and newer than the rest of the ULV.

The area, particularly Freezywater, benefits from good road access to the M25 and radial routes into London. As a result, warehousing and logistics have a strong presence here. Occupiers in the vicinity include national retailers Tesco, John Lewis and Iceland, as well as specialist courier firms such as Yodel, Hermes and DHL.

Evidence from the London Plan suggests that Authorities had a sense that the decline in manufacturing output meant industrial land was no longer required within the various Boroughs. This has led to the continued loss of employment land particularly to housing which has created an incredible pressure and scarcity of resource for industrial land. This pattern has been felt in the ULV where it is evident that there is insufficient existing employment land to deliver the low estimation of Objectively Assessed Need and cannot be delivered through intensification alone.

The London Plan evidence base is clear that, once the already established pipeline of residential development on industrial land is accounted for, demand for industrial land capacity across London will outstrip supply by in excess of circa 605ha. Additional industrial land is therefore needed at the strategic and local level. The imbalance between demand and supply will be greatest in Central London and in areas

earmarked for significant growth, such as Opportunity Areas. Opportunity Areas are expected to deliver large amounts of new housing and jobs which will generate new demand for industrial services, both locally and strategically.

It is our contention that Enfield should seek to focus their industrial needs in the Upper Lea Valley Opportunity Area but that additional sites will be required in order to meet their demand. It is noted that Enfield made submissions to the London Plan Examination in Public and stated that in order to meet their economic and housing needs, additional sites would need to be allocated and that the Borough will need to undertake a Green Belt Review to assess sites most appropriate for Green Belt release. In this respect, the Site at Mollison Avenue is ideally located as it is sandwiched between Freezywater and Innova Park and within the A10 Growth Corridor.

Green Belt

Paragraph 136 of the National Planning Policy Framework states that “Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans.”

Paragraph 134 of the NPPF sets out the five purposes of the Green Belt, namely:

- a) to check the unrestricted sprawl of large built-up areas;
- b) to prevent neighbouring towns merging into one another;
- c) to assist in safeguarding the countryside from encroachment;
- d) to preserve the setting and special character of historic towns; and
- e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

It is against these criteria that we have made the case for the removal of the Site at Mollison Avenue and its allocation for industrial warehousing.

Enfield Council recognises that there are less well performing areas of the Green Belt and proposed to allocate some Green Belt land for housing development to meet identified needs.

The NPPF sets out that when Green Belt it to be released, then brownfield sites and / or sites that have good access to public transport should be prioritised. In this case, whilst there has been historic development on part of the site through landfill, this has mostly been overgrown now so that the site is essentially greenfield. In terms of the PTAL of the site, this ranges from 2 to 1b. As such, the site has relatively good public transport accessibility and can utilise a choice of means of transport other than the private car.

As further consideration that the NPPF requires us to set out is how release of Green Belt land can increase accessibility. Paragraph 138 sets out that councils “*should also set out ways in which the impact of removing*

land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land". The site itself is not currently accessible and does not provide any public access or recreational value. The site is fully enclosed with roads bounding it both to the north and south, the railway line to the west and the Small River Lea to the east. The development of the site will provide an opportunity to provide public access onto the site, and in particular the eastern area which is located adjacent to the Lee Valley Regional Park.

The site is identified in the Lee Valley Park Development Framework as Rammey Marsh West. The Framework sets out that for the site, LVRPA will "*Explore opportunities with stakeholders for the provision of recreation and leisure facilities on Rammey Marsh West, for example a BMX facility. Informal recreational use to be supported and encouraged across both Rammey Marsh East and West, co-ordinated with measures to create habitats and improve access to nature*". Whilst we are seeking an industrial and logistics primary use, the development opportunities could encompass leisure opportunities that meet these aspirations.

The Framework also identifies the potential for a large art installation on the site and this is supported by the promoters.

In terms of the wider effects on the Green Belt, we set out the following considerations:

- The site does not contribute to checking the unrestricted sprawl. The site is surrounded by development on all sides (other than Rammey Marsh itself, albeit, that is also bounded by large scale development). Therefore, the release of the site from the Green Belt would not materially affect this purpose of including land in the Green Belt;
- In terms of neighbouring town merging into one another, this has already occurred both to the east and west of the site. Whilst this land is currently undeveloped, the visual and physical merging has already occurred, and development of this land would not materially increase the already merged settlements;
- The development of the site would lead to loss of countryside, albeit, the quality of the countryside where is very poor both in terms of visual qualities and ecological / leisure qualities with known contamination from landfill. As set out in our wider evidence (and also acknowledged by the Council itself) development needs cannot solely be accommodated on previously developed land and there is a need to release Green Belt land. As such, whilst the release of this site would be contrary to this purpose, this is not a determinative issue;
- The land in Enfield is not recognised as a historic town and the area to the north within Waltham Cross is also not regarded as falling within such a designation. As such, the release of this site will not affect this purpose; and
- As noted, whilst the site has been previously used as landfill, the current site is in a greenfield condition. However, as recognised by the Council there is a need to deliver development on undeveloped land in order to meet need. Therefore. This issue is not determinative.

When assessing the site against the purposes of including land in the Green Belt, it is our view that the site does not perform strongly against the five purposes. Indeed, given the context of the site and its surrounding uses and development, we would consider that the site does not contribute to the wider Green Belt. We also acknowledge that the site is considered as part of the Lee Valley Framework. However, when considering the quality of the site and the aspirations in relation to it, Rammey Marsh East is the key area where enhancements should be supported. The site itself currently does not offer any public function, and its development could provide wider leisure opportunities and access to the site and the wider area. This could form part of the compensatory measures suggested by the NPPF in relation to Green Belt release and also provide improvements as part of the wider Lee Valley Regional Park.

Land at Rammey Marsh, Mollison Avenue

The Site at Mollison Avenue is located between Freezywater and Innova Park industrial estates which are allocated within the Upper Lea Valley Opportunity Area. The purpose of the Opportunity Area is to optimise development opportunities in order to deliver 15,000 new jobs in the Borough. The Site is also within the A10 Growth Area which is explicitly recognised as being ideally situated to enhance the existing industrial sites which make such a vital contribution to London's economy. The Site is therefore strategically and appropriately located to contribute towards the Opportunity Area.

It has been demonstrated that Enfield does not have sufficient land allocated to meet the employment needs for the Borough. Indeed, this fact is supported by the evidence provided by Enfield in the London Plan Examination in Public. As such, additional sites will need to be allocated to ensure that the Borough's target of delivering 15,000 jobs is met.

Furthermore, the Enfield Industrial Demand Report produced by JLL has demonstrated that there is significant demand for urban logistic floorspace in the Borough. The Report has summarised the urgent demand that exists and has demonstrated that the current supply of land is insufficient to meet the demand for industrial and logistics floorspace.

It is therefore contended that in order to meet the evidenced demand for industrial and urban logistics, Enfield need to allocate new sites for development. In this respect, we agree with the evidence provided by Enfield which expands upon the new Local Plan Issues and Options document and which concludes that Green Belt release will be required in order to meet demand.

To this end, it has been demonstrated that the Site at Mollison Avenue is not meeting the five tests of the Green Belt purposes and is suitable for release. Given that the site is not functioning as Green Belt, is fantastically located within the A10 Growth Area and is directly adjacent to two existing and successful industrial sites, it is suggested that the Site should be allocated for Industrial development.

In support of the proposed allocation, Gazeley have provided a series of Masterplan Options to demonstrate the form and function of development that could take place on the Site. This Masterplanning exercise is supported by a series of Opportunity and Constraints plans which have influenced the layout and massing

of the scheme. This exercise has demonstrated that the Site can deliver between 400,000 – 600,000 sqft of industrial warehouse floorspace in a mixture of 2 – 8 buildings. Such quantum of development could deliver up to 700 jobs to the Borough.

The Masterplan Layouts have been assessed by MGCE and have demonstrated that the Site can be suitably accessed and that vehicles can circulate within the Site. Furthermore, MGCE have provided a summary highways technical note which demonstrates that the wider highway network can support the quantum of floorspace without impact or the requirement for mitigation. It is therefore concluded that there are no technical constraints which would prevent the Site being delivered.

The Upper Lea Valley Regional Park is an outstanding and important asset to Enfield and the proposed site sits within one underused disjointed limb of the Park. The release of this poorly accessed and unused area for industrial development will provide opportunities for wider biodiversity enhancements, nature conservation and improved access to the Park.

Gazeley welcomes the opportunity to promote a key site as part of the New Local Plan Call for Sites and trusts that the comments contained within this letter and supporting documents are received in the spirit within which they were written. Gazeley also welcomes the opportunity for future discourse and ability to shape the planning policy framework within which it hopes to thrive.

Yours sincerely