



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

26 February 2021

Dear Sir/Madam,

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

We are writing to you on behalf of our client, GLP, in response to Enfield's Call for Sites request in preparation of their New Local Plan. This letter should be read in conjunction with the information submitted as part of the March 2020 'Call for Sites' process and provides a brief technical update which further evidences the suitability and material benefit in allocating the Site for employment land for industrial warehousing (Use Class B1(c), B2, B8).

It remains 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.

Following the 'Call for Sites' process in March 2020, Enfield has undertaken a Functional Economic Market Area (FEMA) report to assist in meeting the strong forecast need for industrial land in the Borough identified in the Employment Land Review. The report explicitly acknowledges that even if all vacant land in the Borough were to be taken up and every development concerning industrial land in the pipeline came forward (an unlikely scenario), there would remain a net requirement for approximately 6.8 hectares of additional industrial land to meet demand. Therefore, even under this optimistic position, where all known supply options come forward, the additional unconstrained land requirement is not met without further release of new sites for development. The report concludes that Uttlesford is the only Local Authority within Enfield's FEMA which has 'potential' to assist with accommodating Enfield's industrial land demand. However, the assessment notes the difficulties of substituting demand between Enfield and Uttlesford, due to the distance between the LAs and the relative benefits of operating industrial activity between them.

It is our considered opinion that the substituting of industrial land does not actually address the specific needs of businesses within the Borough and their locational requirements. Rather, the evidence collected within the FEMA further reinforces the acute requirement for Enfield to consider the allocation of suitable Green Belt sites for employment uses. In this respect, the Site at Mollison Avenue is not functioning as a Green Belt site against the five purposes, it is strategically and appropriately located to contribute towards the Upper Lea Valley Opportunity Area and the A10 Growth Area, and 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.

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*”. It is notable that a key amendment enforced by the Secretary of State on the Intend to Publish London Plan was to amend the draft Green Belt policy to conform with National Planning Policy Framework. In this respect, Enfield now has the opportunity to alter the Green Belt boundary where exceptional circumstances apply and through the preparation of the Development Plan. The overwhelming need for employment floorspace and the direct economic benefits that this will bring are considered such Exceptional Circumstances.

Following the March 2020 ‘Call for Sites’ process, GLP has undertaken an assessment of the historical records of the Site’s ground conditions which indicates that the former landfill underlying the site has detrimentally impacted Controlled Waters receptors and that a remediation programme is likely to be required. This remediation is highly unlikely to occur without enabling development and therefore the proposed scheme by GLP will provide a demonstrable and significant material benefit to this unused section of the River Lea Valley. Whilst the Site is part of the Lee Valley Framework, when considering the known contamination, the visual and functional quality of the site and the aspirations in relation to it, its development will provide environmental and ecological benefits and could form part of the compensatory measures suggested by the NPPF in relation to Green Belt release and also provide ecological and leisure improvements as part of the wider Lee Valley Regional Park.

GLP 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. GLP also welcomes the opportunity for future discourse and ability to shape the planning policy framework within which it hopes to thrive.



Yours faithfully