



Strategic Planning and Design Team
Enfield Council
FREEPOST
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13 September 2021

Dear Sir/Madam,

New Enfield Local Plan, Main Issues and Preferred Approaches (Regulation 18 Consultation)

We are writing to you on behalf of our client, GLP, to submit representations to the “Draft New Enfield Local Plan 2039 - Main Issues and Preferred Approaches” (Regulation 18 Consultation). This letter should be read in conjunction with the information previously submitted as part of the ‘Call for Sites’ process on 26 February 2021 and 6 March 2020.

The need for Industrial Land in Enfield

In our previous submissions we identified that demand for industrial land capacity within Enfield vastly outstrips supply and that Enfield Council will be unable to deliver their requirements without the release of suitable Green Belt land. The need for a minimum of new 251,505 sqm of floorspace for industrial uses identified in Employment Land Review (2018) (and referenced in the draft Local Plan) is considered to be a conservative figure given that the Covid-19 pandemic has accelerated the shift from high street retail to e-commerce and seen demand for logistics space increase substantially since the study was completed. (This represents a significant reversal of a trend which saw 2 million sqft of developable industrial floorspace lost in the borough between 2001-2015.)

JLL’s researched market opinion contends the Council’s estimate of the potential to intensify existing industrial sites to represents an overly ambitious level of provision and suggests that providing sufficient provision will be challenging at a time when demand is rising further. The acceptance then (at paragraph 9.16 of the Draft Local Plan) that *“it is unlikely that the ELP can rely on intensification alone to fully meet the Borough’s needs in this plan”* is welcomed, as is the recognition (at paragraph 9.17) that *“development of selected Green Belt sites is needed”* as *“[r]estricting development solely to urban sites [will] only meet about half of the borough’s needs for industry and logistics.”*

The delivery of “new sites for industry and logistics and related functions (including mixed use developments) in urban areas accessible to the strategic road network alongside new locations for industrial and logistics development in appropriate parts of the Green Belt” under part 2(b) of draft Policy SP.E1 (Employment and Growth) is therefore strongly supported.

In accordance with this approach, the proposed allocation of sites for employment related use under draft Policy SP.E1 (at Table 9.1) and the identification of these sites – including “SA52 Land West of Rammey Marsh” - both within the policy and on the draft policies map is also strongly supported.

SA52 - Land West of Rammey Marsh

In our previous submissions, we asserted that GLP’s “Site at Mollison Avenue” is ideally located to help meet the Borough’s industrial and logistics requirements and deliver sustainable economic development to contribute towards the Upper Lea Valley Opportunity Area and the A10 Growth Area.

The Highways and Transport : Technical Note (prepared by MGCE) provided in March 2020 demonstrated that the site is in a sustainable location; that safe and suitable access to the site can be achieved for all users; and the traffic flows associated with the proposed allocation can be appropriately managed without resulting in any unacceptable impacts on the operation and safety of the highway network.

Also submitted with those representations were 3 potential layouts demonstrating delivery of between 400,000–600,000 sqft of industrial warehouse floorspace in a mixture of 2 – 8 buildings. In this regard, whilst we entirely support the Council’s ambitions (and the site’s approximate capacity of 70,200sqm (755,626 sqft) of Industrial floorspace), flexibility in the draft allocation must be provided to ensure all development priorities are achieved, as well as the maximisation of industrial floorspace provision.

It is pleasing to see that the ‘Green Belt and Metropolitan Open Land Study 2021’, which has informed the draft allocation “SA52 - Land West of Rammey Marsh”, recognises the site to constate an isolated parcel of land, whose strategic release would constitute “Low-Moderate” harm. However, it is considered that the site’s release from the Green Belt would in fact only amount only to “Low” harm. This is because the site performs poorly against the “five purposes” of green belt identified by the National Planning Policy Framework (NPPF) 2021, as identified below:

1. The site does not contribute to checking the unrestricted sprawl;
2. The existing merging of settlements to the east and west of the site means that development of the land would not have any material impact in terms of settlement merging;

3. Although there would be loss of Countryside from development of the site, the land is very poor both in terms of visual qualities and ecological / leisure qualities, having been used as a landfill site;
4. Development would not impact the setting and special character of any historic towns; and
5. The level of demand for employment land in the borough simply cannot be accommodated on existing urban land. Demand for industrial land is sufficiently strong for the site's development to complement the recycling of nearby derelict and other urban land rather than conflict with it.

Overall, the proposed allocation “SA52 Land West of Rammey Marsh” for “Industrial development” in the “Draft New Enfield Local Plan 2039 - Main Issues and Preferred Approaches” (Regulation 18 Consultation)” is strongly supported, as it recognises that the site is suitable to meet industrial demand and support economic development in the borough.

Objection is however raised regarding the timeframe for delivery as being 5-10 years. There are there are no significant obstacles to bringing forward the site for development and (as there is substantial demand for industrial floorspace) GLP are intent on progressing a planning application as soon as possible, to enable development to be brought forward and completed within the 0-5 year period.

We trust that due consideration will be given to these representations in the preparation of the “Regulation 19” draft Enfield Local Plan 2039 in due course. GLP also welcomes the opportunity for future discourse and ability to shape the planning policy framework within which it hopes to thrive.

Yours faithfully