13 September 2021



Strategic Planning & Design LB Enfield

By email: localplan@enfield.gov.uk

**Dear Sirs** 

# Prologis (UK) Ltd Enfield Draft Local Plan consultation

We act on behalf of Prologis (UK) Ltd, which is a major developer and owner of high quality industrial and logistics buildings in London and throughout the country. As you know from previous discussions, Prologis is very active in LB Enfield and we would be grateful if you would accept the comments set out in the letter as the company's formal response to the Enfield Local Plan consultation.

### Ravenside Retail Park

Prologis is the owner of Ravenside Retail Park, which was acquired in 2019. The site is very well located adjacent to the North Circular Road and it presents an excellent opportunity to provide new high quality logistics floorspace in a sustainable location next to the strategic road network. This approach is supported by the London Plan at policy E4 which seeks to provide a supply of industrial premises in London suitable for a range of functions including logistics and last mile uses, emerging sectors and hybrid space. The provision of additional capacity should be prioritised in locations that are "accessible to the strategic road network" and which "support London's economy and population" (Policy E4 (D)).

There is an acknowledged shortage of land for industry and logistics throughout London and in Enfield, and the re-purposing of the site would help to address this need.

The provision of additional capacity on sites that are well located has the additional benefit that it can help to allow the release of other less suitable land for other uses, as part of the London Plan policy of intensification, co-location and substitution (Policy E7).

We are aware that the draft Local Plan proposes to allocate Ravenside Retail Park for new industrial development, under policy SA47. Prologis supports this draft allocation which mirrors the company's longer term intentions for the site. There are a number of occupational leases in place on some of the existing units which will expire in 2029, meaning that the projected 5-10 year time frame for delivery is sensible.

The draft policy seeks to provide at least 21,700 sq metres of new industrial floorspace in a multi storey development. This is broadly supported subject to the caveat that the delivery of the site will of course be dependent on economic circumstances at the time including the needs of occupiers.

Overall, Prologis fully supports draft policy allocation SA47.

## **Other Comments**

## Other sites

Whilst the above comments are intended to relate specifically to the Ravenside site, there is a broader point about the need to re-purpose other sites in the Borough which may no longer be suitable for their current uses. For example, there are likely to be other retail or retail warehouse sites in Enfield which no longer meet the modern needs of shoppers but are not well suited to be repurposed for residential or similar uses owing to the proximity of unneighbourly uses or busy roads. Sites such as this are often very well suited for urban logistics



and last-mile delivery uses, and Prologis would support the allocation of any sites for additional logistics floorspace in Enfield.

### Green Belt

We are aware that the Council has undertaken a Green Belt and MOL review and that proposed releases are due to be determined at the Reg 19 stage of the Plan. There are many areas of land in the Green Belt which only perform a limited function in terms of the main purposes for including land within the Green Belt, mainly because the openness has been compromised by surrounding development or because the land is already developed to some degree. Some of these such as Innova Park (SA55) are acknowledged within the review. There are other areas of land for example some of the utility sites in the Lea Valley which could provide good opportunities to provide excellent high quality new employment floorspace without compromising the openness of the Green Belt.

The release of these sites in the right circumstances would allow other constrained land within the urban area to come forward for much needed residential uses. Overall, Prologis supports the review of the Green Belt and the release of land in appropriate circumstances, in order to provide good quality logistics land close to the strategic road network.

In summary, Prologis welcomes the opportunity to comment on the draft Local Plan at this stage of the process and we hope that these observations are helpful. We would welcome the opportunity to submit more detailed representations at the Reg 19 stage if it is helpful and we look forward to engaging further over these matters.

Please do not hesitate to contact Nick Green at Savills if there is anything that you would like to discuss.

Yours faithfully