

Our Ref: TAR-111-C

Date: 13th September 2021

Strategic Planning and Design

Enfield Council
Civic Centre
Silver Street
Enfield
EN1 3XA

Sent by email only: localplan@enfield.gov.uk

Dear Sir/Madam,

ENFIELD NEW LOCAL PLAN: REGULATION 18 DRAFT PLAN PUBLIC CONSULTATION - REPRESENTATIONS ON BEHALF OF TARMAC TRADING LIMITED

Heatons have been instructed by our client, Tarmac Trading Limited ('Tarmac'), to prepare and submit a formal representation to the above consultation in relation to their landholding at 6 Morson Road, Enfield. A Site Location Plan showing Tarmac's freehold interest is provided at "Enclosure 1" to this letter for reader ease.

The purpose of this letter is to support the proposed allocation of the site for an employment redevelopment opportunity in the emerging Enfield Local Plan, and to comment on broader draft policies relating to employment and economic growth.

Introduction

The site is approximately 0.5ha in size and is located in the southeast corner of the Meridian Business Park in the Ponders End area of Enfield London Borough. The Business Park is accessed directly from the A1055 onto Morson Road, part of which is also owned by Tarmac.

The Meridian Business Park is identified as a Strategic Industrial Location (SIL) and a Preferred Industrial Location (PIL) in the adopted Enfield Core Strategy 2010 – 2025 (2010). Therefore, the site is located in a well-established employment area and has been lawfully used for ready-mix concrete production, which falls within the B2 General Industrial and Sui Generis use classes as per the provisions of the Use Class Order. The surrounding plots also fall within these uses as well as B8 Storage and Distribution.

The site is not subject to any specific environmental or ecological protections (other than the

aforementioned employment land allocation). However, the River Lee Navigation Canal runs adjacent along the site's eastern boundary, and beyond that is the Chingford Reservoirs (which is also a SSSI). The site itself is in Flood Zone 1 and adjacent to Flood Zone 2 and 3, as indicated by the Environment Agency.

Previous Engagement

On behalf of Tarmac, Heatons have previously engaged with the Council to promote 6 Morson Road for employment redevelopment. In November 2020, a pre-application advice request (ref: 20/03900/PREAPP) was submitted to Enfield Council regarding a proposed B2 General Industrial and/or B8 Storage or Distribution redevelopment. The following advice was received from Enfield Council on 19th January 2021:

“The redevelopment of this site for B2/B8 purposes is considered acceptable in principle as it is compatible with the designation of the site as a Primary Industrial Location (PIL) and Strategic Industrial Land (SIL) within the London Plan and Core Strategy.”

In February 2021, the site was promoted as part of a Call for Sites process for a proposed employment redevelopment allocation in line with the in-principle agreement received as part of the pre-application process.

The Call for Sites submission outlined the opportunity to redevelop and intensify an existing employment use at a brownfield site in a sustainable location. It was considered the site represents a suitable, deliverable and available location for an employment allocation in the emerging Enfield Local Plan. The site is now a proposed allocation for this purpose in the current Reg 18 draft plan and subsequent public consultation.

Enfield Employment Topic Paper (June 2021)

The new Employment Topic Paper summarises key evidence to inform the draft employment policies of the new Enfield Local Plan. The Topic Paper identifies the amount of additional land and floorspace required in Enfield for the period up to 2039 and considers various locations where this could be accommodated in the Borough.

The Topic Paper states that redevelopment of 6 Morson Road offers the potential for an increase in employment floorspace and that it is currently “underused”.

Enfield Local Plan 2019 – 2039: Reg 18 Draft Plan Document

Preparation of the Enfield Local Plan began in 2015. The current Regulation 18 Issues and Options consultation (June – September 2021) forms the latest stage of this process and includes the publication of a Draft Plan. Figure 1 below shows the draft proposals map for the site subject of

this representation.

Draft Strategic Policy E1: *Employment and Growth* allocates sites for employment related uses to ensure the provision of additional floorspace to support business growth in Enfield up to 2039. Table 9.1 identifies 6 Morson Road as site allocation SA50, with an estimated capacity of 2,600 sqm.

Six Morson Road is proposed as an industrial site allocation (reference SA50). This states that the site should provide a new employment use, including a minimum of 2,600sqm of employment (light industrial, general industrial, storage and distribution, and related sui generis) floorspace.

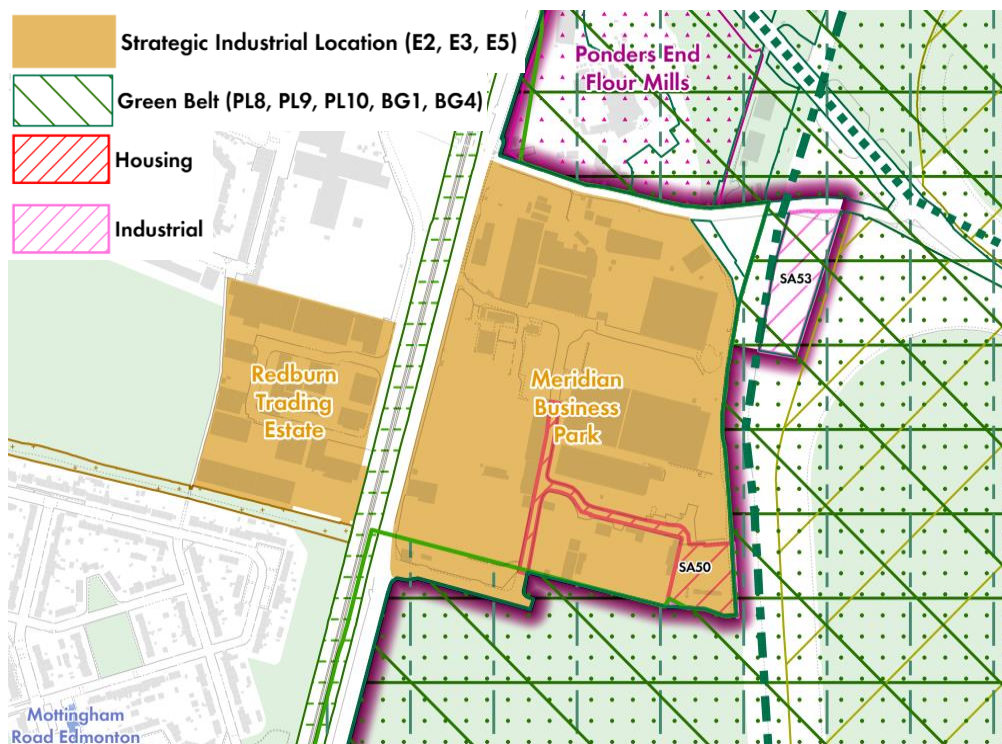


Figure 1: Proposals Map Extract (Enfield Borough Council Website)

Draft Strategic Policy E2: *Promoting Jobs and Inclusive Business Growth* identifies employment locations across Enfield. Strategic Industrial Locations (SIL) are designated and are described as important industrial locations critical to the effective functioning of London's economy. Policy E2 states that these SILs will be safeguarded in accordance with London Plan policies and intensification will be encouraged.

Draft Strategic Policy E3: *Protecting Employment Locations and Managing Change* reiterates the proposed safeguarding of SIL and expands on proposed development that could be acceptable. This states that a wide range of employment uses, including ancillary office and small scale food

and drink and leisure uses to meet the day-to-day needs of workers, will be encouraged in SIL.

Draft Policy E3 also outlines that where sites are redeveloped, scope for intensified industrial floorspace should be prioritised over other forms of development.

Draft Strategic Policy E5: *Transforming Strategic Industrial Locations and Locally Significant Industrial Sites* reinforces that the Council will encourage the intensification of industrial uses within SILs and LSISs through the more efficient use of space. Proposals involving the intensification of industrial uses in these locations will be supported where, amongst other things, as a minimum result in a net increase in employment floorspace and seek to maximise industrial development potential.

Figure 9.1 identifies areas for SIL intensification. Six Morson Road is not indicated as a site with the potential to deliver a significant uplift in industrial floorspace through intensification.

Representation

This representation has been produced by Heatons on behalf of our client, Tarmac, who own 6 Morson Road, Enfield. In regard to the current draft version of the Enfield Local Plan 2019 – 2039, Tarmac are supportive of the intention to retain the industrial allocation of 6 Morson Road as part of a wider Strategic Industrial Location of Meridian Business Park

It is considered that allocation SA50 incorporates the vision for the site as outlined in the Call for Sites and Pre-Application Enquiry submissions earlier this year. Therefore, Tarmac would like to reaffirm the site's availability and deliverability for the proposed employment redevelopment as set out in the draft local plan document.

The range of uses considered acceptable for proposed development in SIL is also supported. Draft Strategic Policy E3 sets out a wide range of employment uses, including small scale food and drink and leisure uses. It is considered this allows a good amount of flexibility for potential owners and occupiers, particularly in relation to 6 Morson Road, whilst also ensuring that provisions for encouraging employment intensification are not undermined.

It is noted that the draft strategic policy earmarks the redevelopment of 6 Morson Road to provide a minimum of 2,600 sqm of employment floorspace. An illustrative site layout plan is attached at "**Enclosure 2**" of this letter. This shows a workable proposal for approximately 2,000 sqm of employment floorspace on the site with sufficient room for access, parking and landscaping. The draft strategic policy should therefore be amended to provide greater flexibility for an employment redevelopment of the site and avoiding any potential significant constraints in the future.

Lastly, figure 1 of this letter shows the draft proposals map published as part of the Reg 18 Issues and Options consultation. This could potentially cause confusion as the proposals map key indicates the site is allocated for housing. To ensure consistency, allocation SA50 should be clearly marked as a proposed industrial allocation on the proposals map.

Conclusion

Overall, the above representations seek to continue to promote Tarmac's 0.5ha freehold interest at 6 Morson Road. To this end, we are supportive of industrial site allocation SA50. This allocation proposes a new employment use for the site in line with previous submissions to Enfield Council through a pre-application request and the Call for Sites process. This representation also confirms the site's continued availability and deliverability in accordance with the proposed allocation.

Tarmac are also supportive of the broader employment policy proposals which encourage the intensification of existing sites in order to meet Enfield's economic needs for the emerging plan period. The aims of draft Strategic Policy E1 and E2 are considered to be consistent with allocation SA50, and we therefore encourage a continued harmony as the new local plan develops.

However, we submit that allocation SA50 should be amended to provide greater flexibility in relation to floorspace.

We trust that these representations are of benefit to the Council in refining the emerging Local Plan. Should any matters require clarification we would be delighted to assist.

Yours faithfully,