



Planning Policy
Enfield Borough Council

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By email: localplan@enfield.gov.uk



13th September 2021

Enfield New Local Plan - Main issues and preferred approaches June 2021

Dear Sir/Madam,

I refer to the above consultation. Thames Water are the statutory water and sewerage undertaker for the borough and is therefore a “specific consultation body” in accordance with the Town & Country Planning (Local Development) Regulations 2012. In addition, Thames Water are a significant landowner in the borough owning a number of reservoirs and surrounding land together with smaller sites that could provide for a variety of future uses and Deephams Sewage Treatment Works. These representations are submitted on behalf of Thames Water as landowner and separate representations will be submitted in relation to water and wastewater infrastructure.

General comments on Thames Water Landholdings

Thames Water are a significant landowner in the borough, including but not limited to, the Lee Valley Reservoirs, the New River and Deephams Sewage Treatment Works and it is considered that areas of land in Thames Water’s ownership could play a significant role in delivering growth within the borough through provision of land for new employment development in particular.

A key sustainability objective for the preparation of Local Plans should be for new development to be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. Paragraph 20 of the revised National Planning Policy Framework (NPPF), 2021, states: “Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for... infrastructure for waste management, water supply, wastewater...” Thames Water seeks to co-operate and maintain a good working relationship with local planning authorities in its area and to provide the support they need with regards to the provision of water supply and sewerage/wastewater treatment infrastructure.

Water and wastewater infrastructure is essential to any development. Failure to ensure that any required upgrades to the infrastructure network are delivered alongside development could result in adverse impacts in the form of internal and external sewer flooding and pollution of land and watercourses and/or low water pressure.

In operating, managing and investing in our assets and landholdings we have to consider what is in the best interest of our customers. This includes considering opportunities for biodiversity, recreation and education, alongside maximising the value of our redundant land, which helps ultimately to keep customers bills lower.

The majority of Thames Water's landholdings are in operational use or are retained for future operational use. By their nature, this means that it is not normally possible for us to provide public access to these operational areas and our operational and security requirements must take precedence.

Thames Water supports the aim of improving access, recreational and leisure opportunities in the Lea Valley, but this must not conflict with our health and safety and operational requirements.

We work to protect and enhance wildlife habitats on and around our operational sites and to share them with communities where possible. From 2020 to 2025 we have committed, with our regulator Ofwat, to enhance biodiversity by 5% at 253 of our most important sites for nature. The area of land to be improved by this five-year biodiversity programme is c.4,000 hectares. We will achieve this by improving the condition of existing habitats through changes in management regimes of grassland. We will also create new habitats with improved connectivity, such as wetlands, woodlands and hedgerows.

In relation to improving biodiversity and landscaping around the Lee Valley reservoirs additional tree planting and grass growth on our embankments can make it very difficult to monitor the integrity of the reservoir. The grass level on the embankments also needs to be kept low with regular mowing/grazing to enable easy surveillance of the embankments and this doesn't normally permit species rich meadow land (which doesn't thrive with regular mowing).

As set out in the new Local Plan at paragraph 9.12 there is a significant need for new industrial land: *"In line with the London Plan, the Council has assessed the Borough's need for industrial land and floorspace, drawing on the Employment Land Review (2018)25. This has identified a minimum (net additional) need for 251,505 sq. m of floorspace for industrial uses. This could require 56 ha of new land"*. This need is particularly acute given the loss of employment land as part of the Meridian Water development.

A number of Thames Water's sites are suitable for employment development and are particularly well located adjacent to the strategic road network and the River Lee navigation.

Energy Generation

In 2019/20, Thames Water pledged to reduce their net carbon emissions from their operations to zero by 2030.

In 2018/19, Thames Water generated 22 per cent of their own electricity needs from renewable sources including sludge, wind and solar power. Most of the renewable electricity Thames Water self-generate comes from the treatment of sewage sludge via anaerobic digestion such as at Deephams Sewage Treatment Works (STW), but to help meet the carbon zero target the use of more biogas and solar power is proposed on operational sites.

We are also planning to build our first biomethane plant at Deephams STW which involves making more efficient use of the biogas generated from the existing treatment of sewage sludge via the

installation of a biomethane upgrading plant to convert biogas to biomethane for injection into the local gas grid.

Thames Water have over 40 solar arrays on our sites across London and the Thames Valley, including the UK's largest floating solar array on the Queen Elizabeth Reservoir. We are continuing to explore opportunities to expand our land and floating solar capacity, as part of our vision of maximising the renewable energy we produce for ourselves and our local communities. We are developing land and floating solar projects in and around our critical infrastructure in north London, including in the Borough of Enfield. This is going to be evermore important for us to ensure operational resilience against the context of population growth and climate change.

Sustainability and Environment

In addition, there may be opportunities for some of the Thames Water land to be used to help facilitate and unlock development on other sites within its portfolio, such as through providing joined-up strategies for green space including biodiversity net gain or flood alleviation schemes where required, where land is being released for development. Thames Water aims to view its portfolio at a strategic level rather than site by site, thus giving the ability to consider how development sites can come forward and offer appropriate mitigation where required alongside this.

General Comments – Employment Land

As set out in the draft Local Plan Policy E1: “To meet the Borough’s identified economic needs this plan looks to provide for a minimum of:

- a) 251,500 sqm of net additional industrial and logistics floorspace
- b) 37,000 sqm for off net additional office floorspace.”

Paragraphs 9.1.1-9.1.3 state: “9.1.1 *Enfield has an identified net additional need for both industrial/ logistics space and office space over the plan period. This means the Borough needs to provide for more – not less – employment floorspace going forward. This raises the challenge of how best to go about accommodating this anticipated growth.* 9.1.2 *An assessment of potential development sites has demonstrated that the Borough cannot accommodate all our anticipated employment needs solely within the urban area. By confining industrial and logistics development to the urban area Enfield would only meet approximately 48% of the borough’s additional need for these types of businesses. Duty to Cooperate (DtC) discussions with local authorities within Enfield’s Functional Economic Market Area (FEMA) have revealed, unsurprisingly, that many face the same challenges as Enfield and they are unable to provide industrial capacity on the Borough’s behalf.* 9.1.3 *By developing selected Green Belt sites in addition to urban sites there is the potential to meet approximately 98% of industrial and logistics needs....*” This need is particularly acute given the **loss of employment land as part of the nearby Meridian Water development.**

Thames Water supports the preferred strategy for industrial development, confirmed as Policy Option B to ‘Meet the Borough’s industrial and logistics needs in the urban area and selected Green Belt sites’ set out at Table 9.2 of the draft Local Plan. However, it is considered there is a need to allocate additional industrial land at sites in the Green Belt beyond those identified in the draft Local Plan. This is necessary in order to meet Borough employment land requirements local requirements, to provide the additional capacity which is beyond the currently identified needs (as

we set out below) and to and provide adequate flexibility to address future changes in circumstances.

Analysis of requirement for additional industrial land need in Enfield is provided below.

Implications of Covid 19 Pandemic

Paragraph 2.27 of the Employment Topic Paper confirms that the evidence regarding industrial and logistics land need was prepared in early 2020 in advance of the Covid 19 pandemic. As the Paper concedes, Covid has set in train a number of features that may now require the Borough to reconsider its assessment of need. Thames Water agree with this statement. Attached to these representations is a Note which provides evidence demonstrating the extent of this acceleration.

With regard to logistics development, the Note confirms that impact of the pandemic has been to accelerate an increase in demand which has already been increasing in recent years. This has primarily been driven by an increase in e-commerce and the pandemic has caused a steep acceleration of this trend.

The growth in on-line retail and the recent steep acceleration of this trend has direct implications for the levels of demand seen from the logistics sector in terms of both the type and quantity of space required. It is estimated there will be a need for an additional 5,593,054 sq. m (60.2 million sq. ft.) of new warehouse space to meet the demands of the online sector by 2025.

This need is particularly pronounced at the local level due to the location of much of Enfield in relation to main arterial routes making it a particularly desirable location for logistics development to accommodate this increased demand.

Due to this very likely significant increase in requirement for logistics development during the plan period, we consider that it will be necessary to allocate additional sites above the minimum 251,500 sqm floor space, determined as the required need before the pandemic. Therefore, we suggest that the evidence base be updated to seek to identify a more suitable increased figure for the next stage of the Local Plan production.

Evidence Base

The calculation of employment land requirement summarised in the Employment Topic Paper (June 2021) states that 47% of industrial land need can be accommodated on urban sites and industrial intensification. This equates to 117,297sqm floorspace or 26ha of land. It is noted, however, that intensification of existing industrial land can provide 34,009 sqm or 7.5ha of land, equating to 13.5% of total need and urban sites are referenced as providing 21% (12ha) of the floorspace.

It is therefore unclear from the evidence base documents how the figure of 47% has been reached from these two sources of urban supply. Clarification is required and, should urban sites not result in this proportion of the overall floorspace, then additional sites outside of existing urban areas will be required to be allocated to meet the evidenced demand.

The Local Plan confirms that a minimum of 251,500 sqm of industrial and logistics floorspace is required to meet Enfield's economic needs. Notwithstanding the likelihood that land in addition to

this will be required, addressed above, the Plan does not actually identify sufficient sites to meet this minimum requirement.

If existing employment sites are to be subject to intensification in accordance with London Plan Policy E7 'Industrial intensification, co-location and substitution' then there is potential that the resulting mix of development is of a different industrial character, meaning that for example residential-led mixed use industrial and logistics floorspace may be provided, which may present a difficult challenge for occupiers and businesses. Additional sites should therefore be identified in order to provide opportunities for industrial and logistics use to respond to this circumstance.

It is also considered preferable for additional sites to be identified in order that former industrial sites will be able to deliver positive placemaking benefits by introducing mixed-use development as per London Plan Policy E7. Allocation of further sites would allow for this, with additional Green Belt sites which make a low contribution to the purposes of the Green Belt and that are well located strategically addressing any shortfall in employment floorspace that might arise as a consequence.

Additional employment land should also be identified to ensure that in the event of a shortfall against the requirement occurring that this can be quickly addressed and to allow for further responses in the event of allocations not coming forward for development as anticipated or sites yielding a lower level than expected amount of employment floorspace.

It is therefore necessary to consider additional appropriate sites to release from the Green Belt now in order to meet and exceed the minimum requirement to provide an adequate safeguard and buffer against non or under delivery of sites, because Green Belt Review must happen as part of this Local Plan process. Details of Thames Water sites, which are available and appropriate to meet this demand, are provided below.

Providing Flexibility and Meeting Additional Need

For the reasons set out above it is necessary to identify additional land to accommodate industrial and logistics development due to likelihood of further land being required in excess of the previously assessed need and to provide additional flexibility and buffer of land to account for floor space not being delivered and maintained as the draft Plan anticipates. Given the limited available land in the urban area and potential for intensification of existing sites, it is necessary for additional release of Green Belt land.

The Thames Water owned site on Land North West of Innova Park (SA55) is already proposed for allocation as employment land in the draft plan and removal from the Green Belt and this is supported by Thames Water. Site specific comments demonstrating its suitability are provided below and confirm it is correct for this allocation to be retained to assist in meeting demand for employment land.

It is noted that strategic exceptional circumstances to release land from the Green Belt for employment purposes are not specifically articulated in the draft Local Plan or evidence base. Strategic exceptional circumstances set out in the Growth Topic Paper (May 2021) are confined to addressing Green Belt release to meet housing land requirements. The existence of exceptional circumstances relating to releasing Green Belt land for employment purposes is necessary in order to understand the justification for release of land for this use and whether the Local Plan complies with NPPF Paragraphs 140 and 141.

NPPF Paragraph 142 requires sustainable patterns of development to be taken into account when reviewing Green Belt boundaries, *'channelling development towards urban areas inside the Green Belt boundary'* and that, *'where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport.'*

This means that once all sources of brownfield land and density maximisation have been assessed (which, as we set out above, we consider has been done adequately and reasonable assumptions have been made about the supply expected from these sites) and adjoining Boroughs have been consulted (we do not expect any adjoining Boroughs to have significant surplus capacity), a case should be put forward for exceptional circumstances in order to justify the release of Green Belt to meet employment and economic growth needs.

This case should relate to the evidence-based demand requirements, in the context of the Borough and London-wide economic needs. It should also consider the need for sustainable patterns of growth as per NPPF paragraph 142, which should ensure that new economic development is delivered sustainably and within more urbanised areas in the Green Belt.

In considering site-specific exceptional circumstances, we have set out below the cases for release from the Green Belt of the identified draft allocation at land north west of Innova Park (reference SA55); and in relation to the need for the allocation of further sites within the Green Belt, four other Thames Water sites as listed below are available and suitable for employment development:

- Land to South of William Girling Reservoir EN3 4TG
- Land to North West of William Girling Reservoir, Wharf Road, Columbia Wharf, Ponders End EN3 4TG
- Land to North West of William Girling Reservoir, Wharf Road, Ponders End EN3 4TG
- Land to South West of King George V Reservoir, Lea Valley Road E4 7PX

Details of each of these Sites demonstrating their suitability for development and exceptional circumstances associated with each to justify their release from the Green Belt are provided below.

Figure 1 shows the location of the Thames Water owned sites with red coloured boundaries. The figure demonstrates that each site is very well related to existing employment areas, with each being in close proximity to defined Strategic Industrial Locations and the Strategic Road Network. These sites are therefore considered the best locations for accommodating additional employment development being within or adjacent to urban areas of industrial character and well located in relation to public transport provision. The removal of these sites from the Green Belt and allocation for employment use should therefore be prioritised.

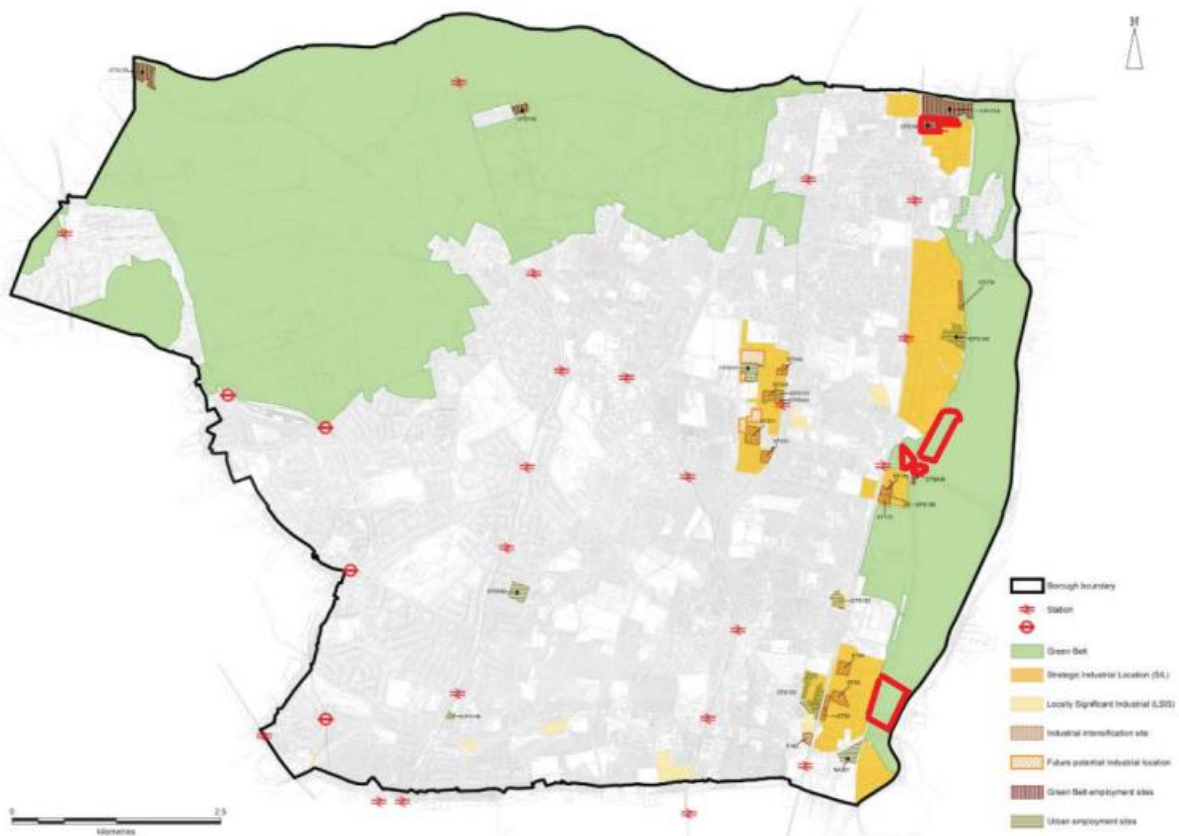


Figure 1: Location of proposed Thames Water Employment Sites in Enfield

Figure 1 shows the location of the Thames Water owned sites with red coloured boundaries. The figure demonstrates that each site is very well related to existing employment areas, with each being in close proximity to defined Strategic Industrial Locations and the Strategic Road Network. These sites are therefore considered the best locations for accommodating additional employment development and their removal from the Green Belt and allocation for employment use should be prioritised.

Specific Site Comments – Proposed Allocations

Employment

SA55: Land to North West Innova Park

Kennet Properties Limited (KPL) is a wholly owned subsidiary development company within the Thames Water group. KPL's remit is to identify land that is, or may become, surplus to the operational requirements of Thames Water Utilities Limited and to promote it for alternative beneficial uses.

KPL wholly supports the removal of the site from the Green Belt and allocation for employment and confirm that it is available for development.

The site is identified under allocation SA55 for employment development comprising at least 16,455 m² of new employment floorspace (light industrial, general industrial, storage and

distribution, and related sui generis). Thames Water consider this minimum amount of floor space is reasonable and deliverable at the site for office, warehouse and distribution development.

Allocation SA55 sets out that redevelopment should:

- Address highways impacts of development
- Mitigate flood risk.

In support of these representations please find enclosed:

- Transport Technical Note by TPA, dated September 2021, which confirms highways impacts would be acceptable and appropriate access to the site can be taken from the public highway.
- Preliminary Ecological Appraisal, dated August 2021, which confirms that subject to implementation of mitigation measures, no significant reduction in ecological interest of the site or surrounding area is likely to arise as a result of development pursuant to the proposed allocation and that there are opportunities for biodiversity enhancement measures including minimum 10% Biodiversity Net Gain.

Site History

The site forms part of the Former Thames Water Romney Marsh Sewage Sludge beds that have previously been redeveloped into Innova Park. Innova Park is one of Enfield's key Strategic Industrial Locations (SIL) and is an important component of both the Borough and London's economy accommodating a number of companies, which form a key part of the supply chain for Central London businesses.

Innova Park is made up of modern office, warehouse and distribution units. Occupiers include John Lewis, Iceland and Sony. Given its good access to the local and regional road network and generous plot ratios, the Council Industrial Estates Strategy recommends that it is suitable for continued logistic and distribution uses.

The proposed SA55 site is generally flat and overgrown with bunds around the southern boundary. In the eastern end of the site is an overgrown pond and around the northern boundary is a stream within a concrete channel.

The site is surrounded by existing development to the west (railway line with residential development beyond), south and east (Innova Park) with the Mollison Avenue carriageway to the north. There is mature vegetation along the northern boundary of the site adjacent to Mollison Avenue.

There is an existing highways access to the site off Mollison Avenue, but this is currently blocked off to prevent illegal access/trespass.

Highways Impacts

The enclosed Technical Note prepared by Transport Planning Associates confirms that appropriate and safe access can be taken from Mollison Avenue into the site, allowing for safe access and egress by HGVs. Appended to the Note is a detailed access plan from the southern side of Mollison Avenue providing suitable visibility

Further, the Note confirms the quantum of HGV movements associated with development of the site in accordance with proposed allocation would not pose a highways safety issue or impede the existing character of Mollison Avenue, which currently serves a large number of industrial and warehouse units.

Development at the site would not therefore result in any severe detrimental highways effects.

Ecology

The enclosed Preliminary Ecological Appraisal confirms that there are no statutory or non-statutory wildlife sites within the site or in the surrounding area.

The Appraisal also confirms the site has potential to support a number of protected and notable species and recommend surveys are undertaken. Such surveys will be undertaken in the correct season in advance of any planning application, to inform the layout, design and any specific mitigation required; and can be made available on request.

A number of principles for avoidance of harm, biodiversity mitigation and enhancement are included in the Appraisal. The principles set out will be taken forward, discussed with stakeholders, designed and implemented appropriately in any scheme here in order to provide at least 10% Biodiversity Net Gain.

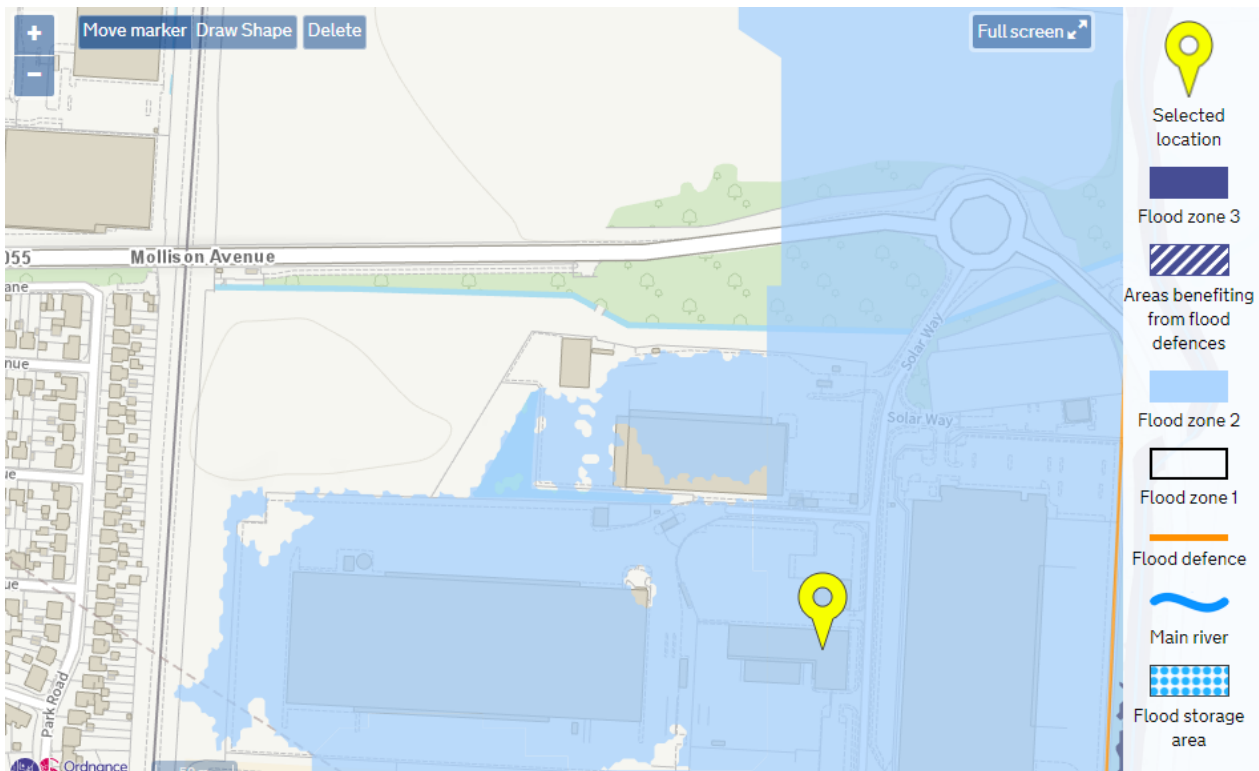
There is, therefore, no reason for ecological considerations to be considered a constraint to delivering employment development at the site, with a scheme being wholly capable of meeting NPPF and local planning policy requirements in this regard.

Flood Risk

The site is shown to be predominantly located within Flood Risk Zone 1 on the Government flood risk map and therefore is low risk. However, the existing small pond in the south east corner is shown to be located within Flood Zone 2.

As the site is over 1 hectare and a small part is located within Flood Zone 2, a flood risk assessment will be undertaken to support any future planning application.

It is considered that given the site is predominantly located within Flood Risk Zone 1 (other than the existing small pond which is unlikely to be developed) the future users of the proposed development will be safe from flooding and there will be no detrimental impact on third parties. The proposal complies with the NPPF and local planning policy with respect to flood risk and is an appropriate development at this location.



Extract from Government Flood Risk Map

Green Belt

We support the Council’s assessment of the impact of releasing the site from the Green Belt and agree that the impact would be low (part of site LV1).

We agree that Mollison Avenue maintains a greater sense of separation from the inset urban edge for the open land in the northern section of LV1 and screens the site from the wider Green Belt to the north and east. Release of the KPL land south of Mollison Avenue, along the weakest urban boundary shared with Innova Business Park would retain the strong boundary features enjoyed by the land to the north and have a negligible impact on the distinction of the remaining Green Belt land – due to its current lack of distinction from urban area. Release of the KPL land therefore results in low Green Belt harm.

As such, we consider that exceptional circumstances do exist for the release of this land from the Green Belt and that the council should set this out in evidence-based assessment produced for the next stage of the Local Plan.

Specific Site Comments – Additional Green Belt Employment Sites

There are a number of other specific sites owned by Thames Water which are considered to be suitable for development to help meet the needs of the borough:

Employment

Land to South of William Girling Reservoir EN3 4TG

Thames Water consider that the site as identified on the enclosed plan should be removed from

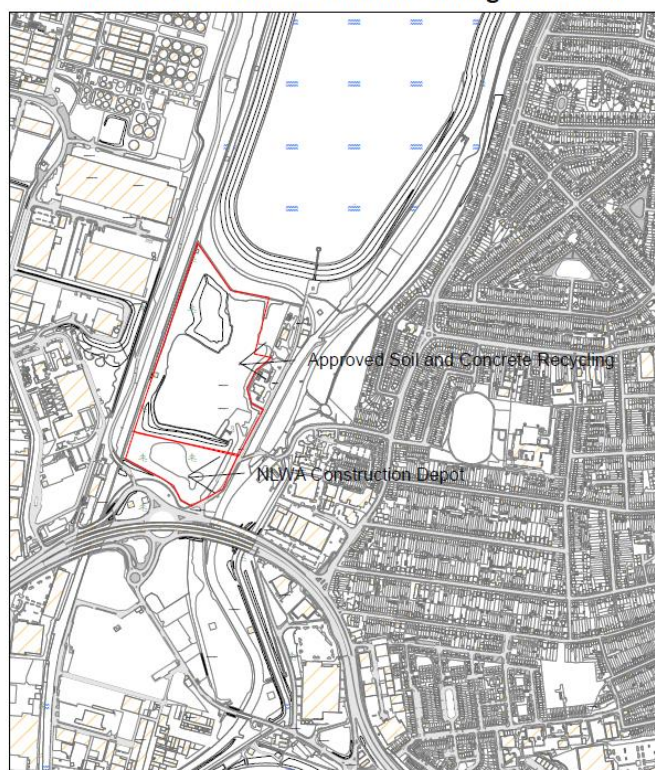
the Green Belt and allocated as Strategic Industrial Land that would be suitable for future water infrastructure/utilities development or alternative employment development. A comprehensive development strategy for the site could also enable improvements to public access/open space and biodiversity net gain.

Site History

A Certificate of Lawfulness was granted for the northern part of the Site by Enfield Council for the use of the site for soil and concrete recycling on 24th February 2020 (Ref: 18/02077). The site therefore constitutes a lawful waste use site and previously developed land. The site is in operational use for waste recycling and includes large mounds of recycling material and associated buildings and roads.

The southern part of the Site is currently being used by North London Waste Authority as contractors depot as part of the Development Consent for the North London Heat and Power Project.

Land to the South of William Girling Reservoir

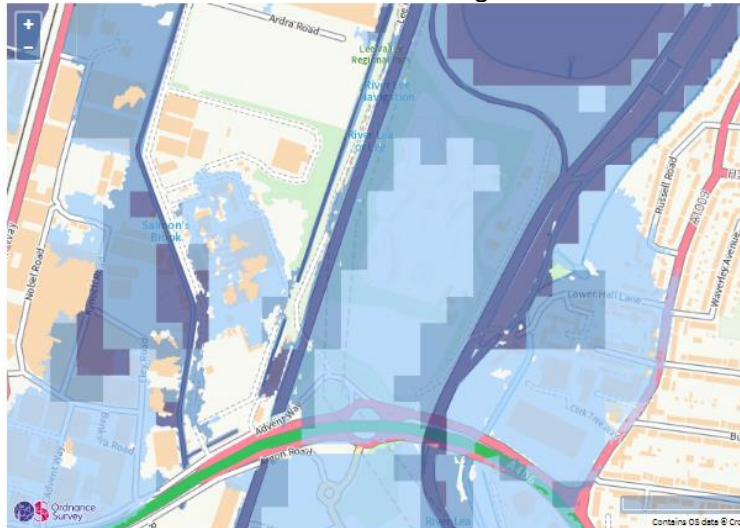


The Council's HELAA 2021 also concurs that the site is '*potentially developable*' subject to a review of planning policy constraints and appropriate mitigation. The HELAA confirms the site is within the built-up area and does not contain heritage assets, higher grade agricultural land and is not designated local open space.

The key planning policy constraint is Green Belt designation which covers the site, with environmental constraints in the form of flood risk, with approximately 10% of the site being in Flood Zone 2 and 3 and ecology, with part of the site designated as a Site of Metropolitan Importance for Nature Conservation.

Flood Risk & Ecology

It is understood that historically the site may have been affected by flood risk. However, the majority of the site is now shown on the Government flood risk map as Zone 1 – Low Risk, with Zone 2 – Medium risk around the edges as shown on the extract below:



Extent of flooding from rivers or the sea

● High ● Medium ● Low ● Very low 📍 Location you selected

Extract from Government Flood Risk Map

Following the issue of Certificate of Lawfulness, the northern part of the site constitutes a lawful waste use site and previously developed land. The site is in operational use for waste recycling and includes large mounds of recycling material and associated buildings and roads located above the flood risk level.

It is recognised that the southern part of the site, currently used as a contractor's depot, is covered by a Site of Metropolitan Importance for Nature Conservation (SMINC). The operations being undertaken at the site in accordance with the Certificate of Lawfulness and contractor's depot significantly prejudice high quality habitats and opportunities to enhance biodiversity. However, as part of any development, mitigation can be provided elsewhere on site or Thames Water's landholdings to provide biodiversity net gain.

The two parts of the site could be developed comprehensively or independently. Given the different planning status of the two parts of the site, they should be considered both individually and together. However, a comprehensive development strategy for the whole site could enable joined up improvements to public access/open space and biodiversity net gain.

Green Belt

As set out above, we support Option B set out in table 9.2 of the draft Local Plan that selected Green Belt sites will be required to help meet the Borough's industrial and logistics need and analysis of employment land evidence demonstrates that additional sites to those currently identified will be required to meet this need.

The Thames Water site to south of William Girling Reservoir and north of Meridian Water, is such a suitable location for removal from the Green Belt that has direct access to the strategic road

network (North Circular) and has the potential for transport by rail and water being adjacent to the River Lee Navigation.

Given the location and current waste use on the majority of the site and the surrounding development it is considered that it weakly performs in accordance with the 5 purposes for Green Belt as set out in paragraph 134 of the NPPF and below:

- a) the site largely constitutes previously developed land (where new development is encouraged in the NPPF) on the edge of the urban area which will not impact urban sprawl. The site is surrounded by a tall landscaped screening bund and contains large mounds of waste material and therefore does not contribute towards openness;
- b) the redevelopment of the site will not reduce the gap between existing settlements as it is already developed and largely covered with tall mounds of waste material;
- c) the redevelopment of this previously developed site will assist in safeguarding the countryside from encroachment;
- d) the redevelopment of the site will not have any detrimental impact on the setting and special character of a historic town; and
- e) it will positively contribute towards urban regeneration, by encouraging the recycling of previously developed land which currently detracts from the character of the surrounding area. It is considered that the redevelopment of the site could significantly enhance the environmental quality of this part of London by bringing forward development in unison with high quality landscaping and open space rather than maintaining the current status of the site comprising of high stockpiles of materials for recycling which are screened by a screening bund which impacts upon openness.

The Council’s Green Belt and MOL Assessment identifies the site as Site LV21 as per the extract below:

LV21
20.82ha



Parcel location
The parcel is located north of Angel Road and south of William Girling Reservoir.

The Green Belt and MOL Assessment 2021 conclude that the harm of release would be ‘moderate-high’, but there are considered to be major flaws in this assessment.

The assessment sets out that release of the parcel would significantly narrow the gap between

Edmonton and Chingford to the east. However, what the assessment fails to make reference to, is that the site already fails to contribute towards the gap and fails to make any reference to the lawful waste use and large stockpiles/bunds on the site.

As set out above, the majority of the site is in lawful waste use site and constitutes previously developed land. The site is in operational use for waste recycling and incorporates large mounds of recycling material with large screening bunds and associated buildings and roads, all of which significantly detract from openness to this part of the Green Belt.

Summary

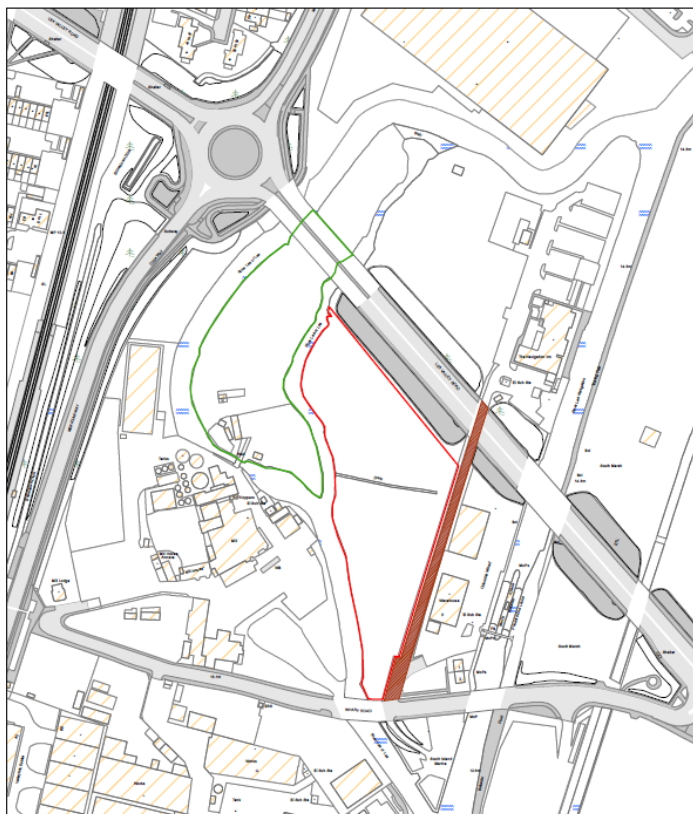
It is therefore considered that this very accessible low performing site should be removed from the Green Belt and allocated as Strategic Industrial Land that would be suitable for future water infrastructure/utilities development or alternative employment to help meet the high need in the Borough.

The HELAA estimates the site can provide 53,000 sqm of industrial or logistics floorspace. Thames Water consider this amount of floorspace is reasonable and deliverable and, therefore, this site can make such a significant contribution to meeting employment land need in Enfield.

Land to North West of William Girling Reservoir, Wharf Road, Columbia Wharf, Ponders End EN3 4TG

Thames Water consider that the site as identified on the enclosed plan should be removed from the Green Belt and Local Open Space allocated for employment development.

TW Land at Ponders End, Columbia Wharf, Enfield



The site outlined in red on the plan above is currently retained operational land, but could be made available for development.

The Council's HELAA 2021 also concurs that the site is '*potentially developable*' subject to a review of planning policy constraints. The HELAA confirms the site is adjacent to the edge of the urban area with no known physical or access constraints to development. The site does not comprise higher grade agricultural land, heritage assets or local open space designation.

The key planning policy constraint is Green Belt designation which covers the site, with environmental constraints in the form of flood risk, being partially within EA Flood Zone 2 and ecology designations in the form of a Site of Special Scientific Interest (SSSI) which is outside of the site, but nearby.

Green Belt/Local Open Space

As set out above, we support Option B set out in table 9.2 of the draft Local Plan that selected Green Belt sites will be required to help meet the Borough's industrial and logistics need and analysis of employment land evidence demonstrates that additional sites to those currently identified will be required to meet this need.

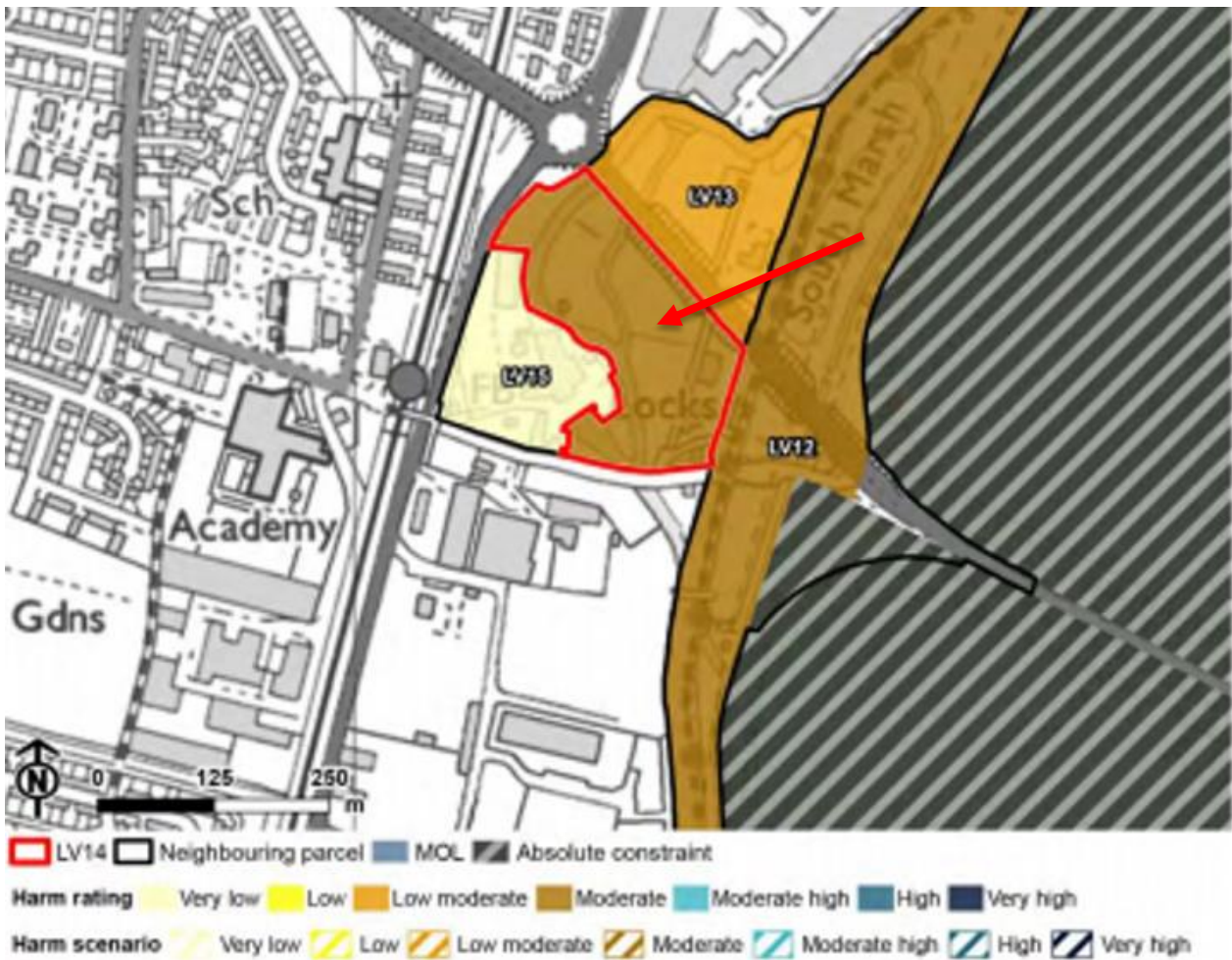
It is considered that exceptional circumstances exist to remove the weakly performing site from the Green Belt as part of the Green Belt Review and to help meet employment development needs.

The site to the north west of William Girling Reservoir, is such a suitable location for removal from the Green Belt that has direct access to the A110 Lee Valley Road and has the potential for transport by rail and water being close to the River Lee Navigation.

Given the location of the site, it is considered that it weakly performs in accordance with the 5 purposes for Green Belt as set out in paragraph 134 of the NPPF:

- a) the site is located on the edge of the urban area and is surrounded by existing development to the west, south and east and Lee Valley Road to the north. The site is well contained with defensible boundaries and development will not impact urban sprawl;
- b) the redevelopment of the site will not reduce the gap between existing settlements and will not lead to neighbouring towns merging into one another;
- c) the development of this site will assist in safeguarding the countryside from encroachment;
- d) the redevelopment of the site will not have any detrimental impact on the setting and special character of a historic town; and
- e) an appropriately designed employment development could enhance the character of the site and surrounding area and it will positively contribute towards urban regeneration by developing land which is within an urban location rather than open countryside.

The Council's Green Belt and MOL Assessment identifies the site as Site LV14 as per the extract below:



The Green Belt and MOL Assessment 2021 conclude that the harm of release would be ‘moderate’.

We support the removal of the Local Open Space designation in the new Local Plan as there is no public access to the site and it does not perform any Local Open Space or amenity function. Indeed, through allocation and development of the site, there would likely be the potential to create and enhance amenity use on parts of the site for biodiversity and other uses.

Ecology & Flood Risk

It is recognised that the site is covered by a Site of Metropolitan Importance for Nature conservation (SMINC) but as part of any mitigation can be provided elsewhere on site or on Thames Water’s landholdings within the Borough to provide biodiversity net gain. It is similarly considered that any necessary flood risk mitigation can be provided elsewhere similar to the strategy for the Meridian Water development.

Summary

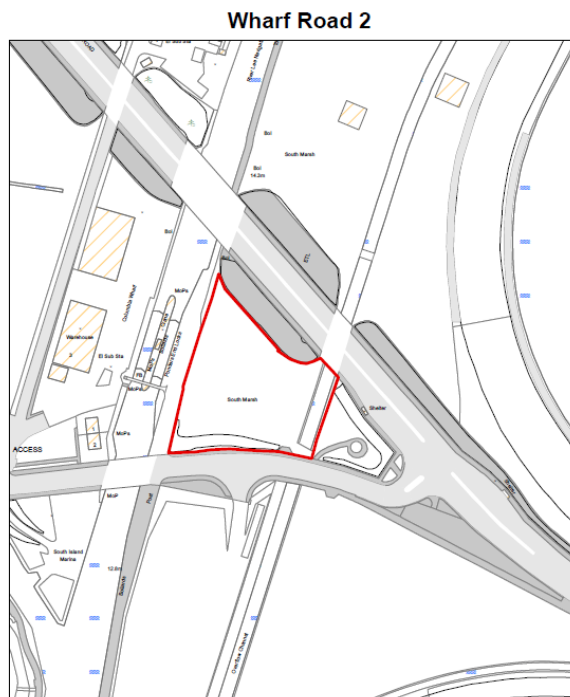
It is therefore considered that this very accessible site should be removed from the Green Belt and allocated for employment to help meet the high need in the Borough.

The HELAA estimates the site can provide 6,825 sqm of industrial or logistics floorspace. Thames

Water consider this amount of floorspace is reasonable and deliverable here and, therefore, this site can make such a valuable contribution to meeting employment land need in Enfield.

Land to North West of William Girling Reservoir, Wharf Road, Ponders End EN3 4TG

Thames Water consider that the site as identified on the enclosed plan should be removed from the Green Belt and Local Open Space allocated for employment development.



The site outlined red on the plan above is currently retained operational land, but could be made available for development.

The Council's HELAA 2021 also concurs that the site is '*potentially developable*' subject to a review of planning policy constraints. The HELAA confirms the site is adjacent to the edge of the urban area and does not comprise higher grade agricultural land, heritage assets or local open space designation.

The key planning policy constraint is Green Belt designation which covers the site, with environmental constraints in the form of flood risk, with part of the site being within EA Flood Zone 2 and ecology designation in the form of a SSSI which is outside of the site, but nearby.

Green Belt/Local Open Space

As set out above, we support Option B set out in table 9.2 of the draft Local Plan that selected Green Belt sites will be required to help meet the Borough's industrial and logistics need and analysis of employment land evidence demonstrates that additional sites to those currently identified will be required to meet this need.

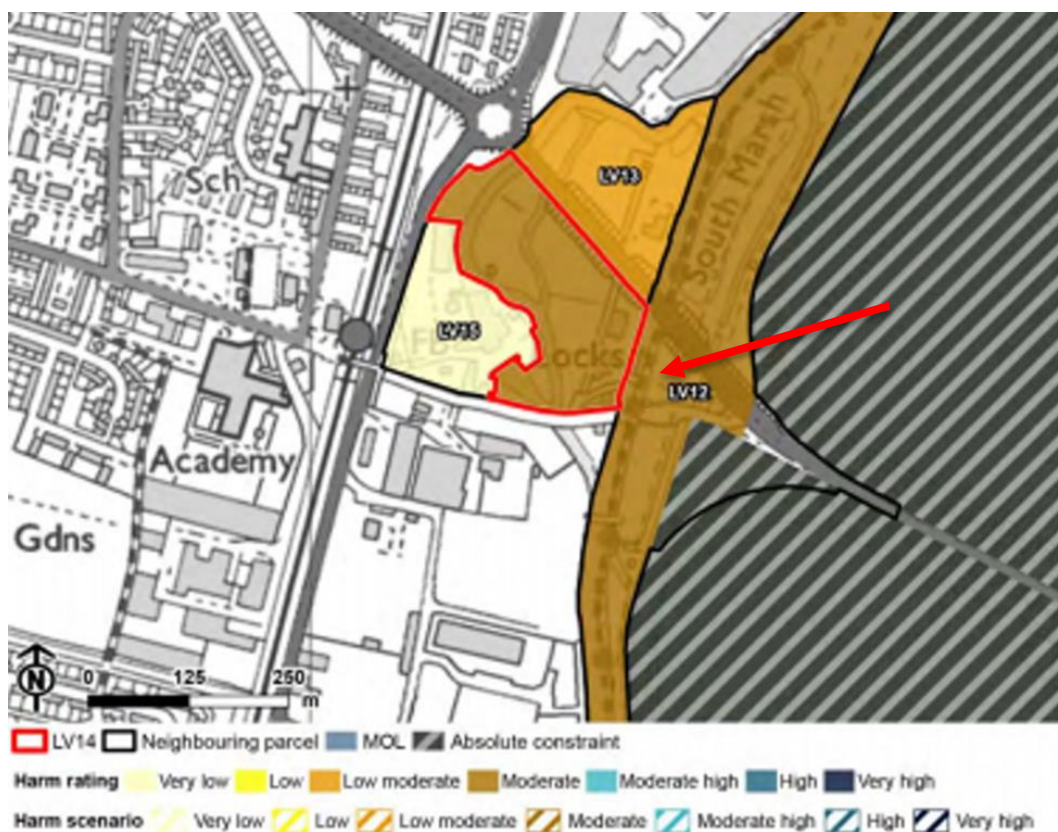
It is considered that exceptional circumstances exist to remove the weakly performing site from the Green Belt as part of the Green Belt Review and to help meet employment development needs.

The site to the north west of William Girling Reservoir, is such a suitable location for removal from the Green Belt that have direct access to the A110 Lee Valley Road and has the potential for transport by rail and water being close to the River Lee Navigation.

Given the location of the site it is considered that it weakly performs in accordance with the 5 purposes for Green Belt as set out in paragraph 134 of the NPPF:

- a) the site is located on the edge of the urban area and is surrounded by roads and existing development. To the north and east is Lee Valley Road, Wharf Road to the south and the River Lee Navigation and Ponders End Lock to the west. The small infill site is well contained with defensible boundaries and development will not impact urban sprawl;
- b) the redevelopment of the site will not reduce the gap between existing settlements and will not lead to neighbouring towns merging into one another;
- c) the development of this site will assist in safeguarding the countryside from encroachment;
- d) the redevelopment of the site will not have any detrimental impact on the setting and special character of a historic town; and
- e) an appropriately designed employment development could enhance the character of the site and surrounding area.

The Council’s Green Belt and MOL Assessment identifies the site as Site LV12 as per the extract below:



The Green Belt and MOL Assessment 2021 conclude that the harm of release would be ‘moderate’.

We support the removal of the Local Open Space designation in the new Local Plan as there is no public access to the site and it does not perform any Local Open Space function.

Ecology & Flood Risk

It is recognised that the site is covered by a SMINC but as part of any mitigation can be provided elsewhere on site or Thames Water's landholdings to provide biodiversity net gain. It is similarly considered that any necessary flood risk mitigation can be provided elsewhere similar to the strategy for the Meridian Water development.

Summary

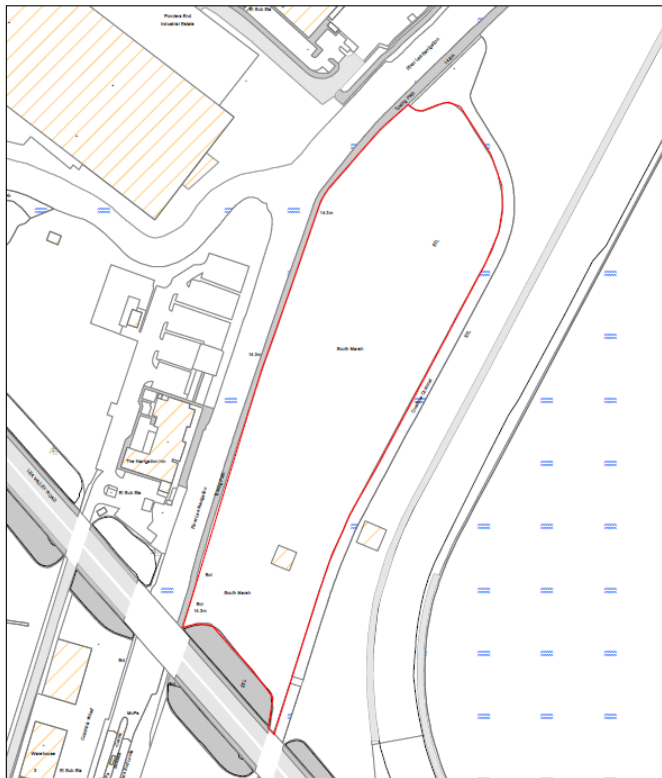
It is therefore considered that this very accessible site should be removed from the Green Belt and allocated for employment to help meet the high need in the Borough.

The HELAA estimates the site can provide 3,575 sqm of industrial or logistics floorspace. Thames Water consider this amount of floorspace is reasonable and deliverable and, therefore, this site can make such a valuable contribution to meeting employment land need in Enfield.

Land to South West of King George V Reservoir, Lea Valley Road E4 7PX

Thames Water consider that the site as identified on the enclosed plan should be removed from the Green Belt and Local Open Space and allocated for employment development.

TW Land adj to King George V Reservoir



The site is currently retained operational land, but could be made available for development.

The Council's HELAA 2021 also concurs that the site is '*potentially developable*' subject to a review of planning policy constraints. The HELAA confirms the site is adjacent to the edge of the urban area and does not comprise higher grade agricultural land, heritage assets or local open space designation.

The key planning policy constraint is Green Belt designation which covers the site, with environmental constraints in the form of flood risk, with the site being in EA Flood Zone 2 and ecology designation in the form of a SMINC

Green Belt/Local Open Space

As set out above, we support Option B set out in table 9.2 of the draft Local Plan that selected Green Belt sites will be required to help meet the Borough's industrial and logistics need and analysis of employment land evidence demonstrates that additional sites to those currently identified will be required to meet this need.

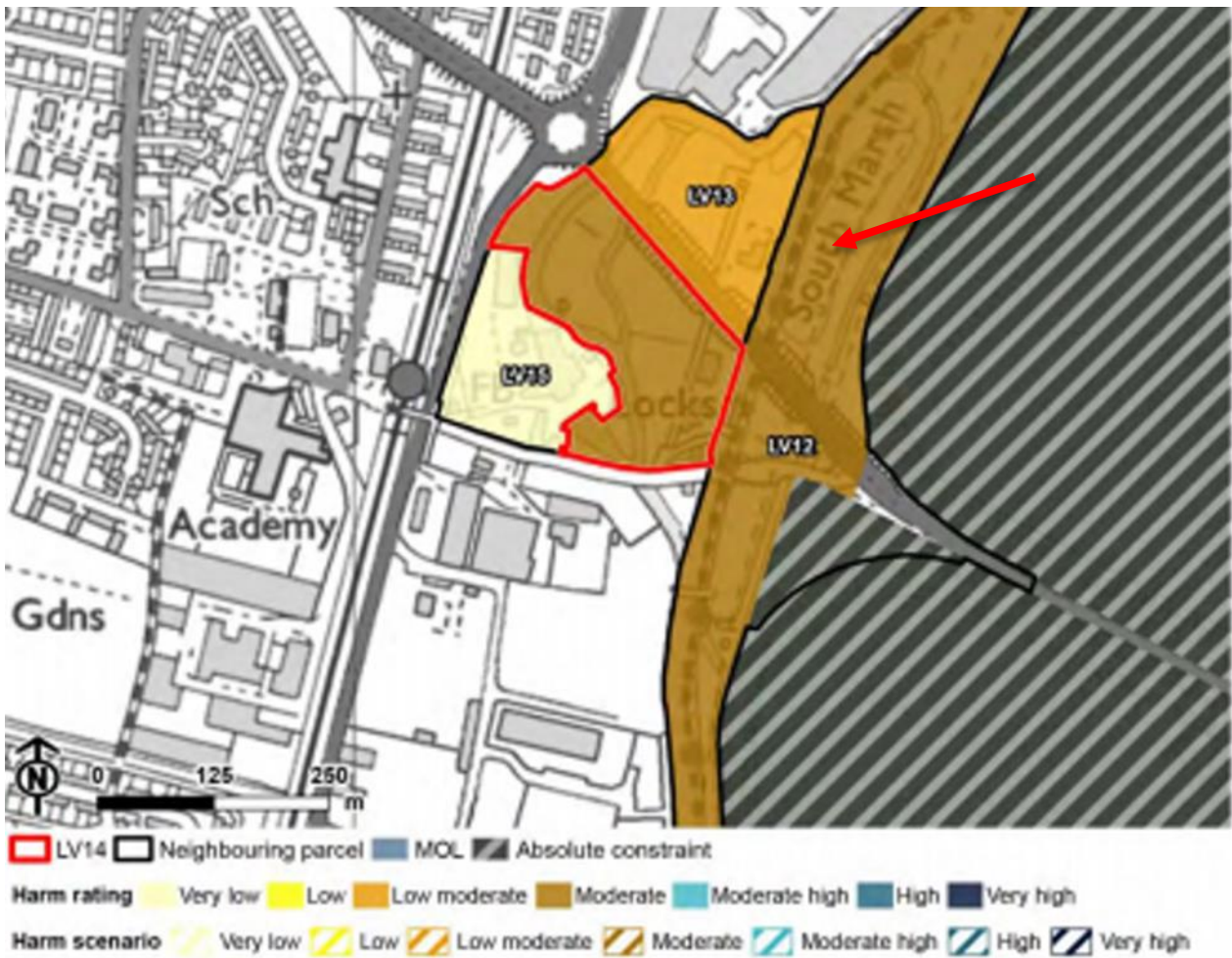
It is considered that exceptional circumstances exist to remove the weakly performing site from the Green Belt as part of the Green Belt Review and to help meet employment development needs.

The Thames Water site to south west of King George's Reservoir, is such a suitable location that has direct access to the A110 Lee Valley Road and has the potential for transport by rail and water being directly adjacent to the River Lee Navigation.

Given the location the site it is considered that it weakly performs in accordance with the 5 purposes for Green Belt as set out in paragraph 134 of the NPPF:

- a) the site is located on the edge of the urban area and is surrounded by roads and existing development. To the north west is Enfield Distribution Park, to west is River Lee, to the south is Lee Valley Road and to the east are the embankments of King George's Reservoir. The site is therefore well contained with defensible boundaries and development will not impact urban sprawl;
- b) the redevelopment of the site will not reduce the gap between existing settlements and will not lead to neighbouring towns merging into one another;
- c) the development of this site will assist in safeguarding the countryside from encroachment;
- d) the redevelopment of the site will not have any detrimental impact on the setting and special character of a historic town; and
- e) an appropriately designed employment development could enhance the character of the site and surrounding area.

The Council's Green Belt and MOL Assessment identifies the site as Site LV12 as per the extract below:



The Green Belt and MOL Assessment 2021 conclude that the harm of release would be 'moderate'.

We support the removal of the Local Open Space designation as there is no public access to the site and it does not perform any Local Open Space function.

Ecology & Flood Risk

It is recognised that the site is covered by a SMINC but as part of any mitigation can be provided elsewhere on site or Thames Water's landholdings to provide biodiversity net gain. It is similarly considered that any necessary flood risk mitigation can be provided elsewhere similar to the strategy for the Meridian Water development.

Summary

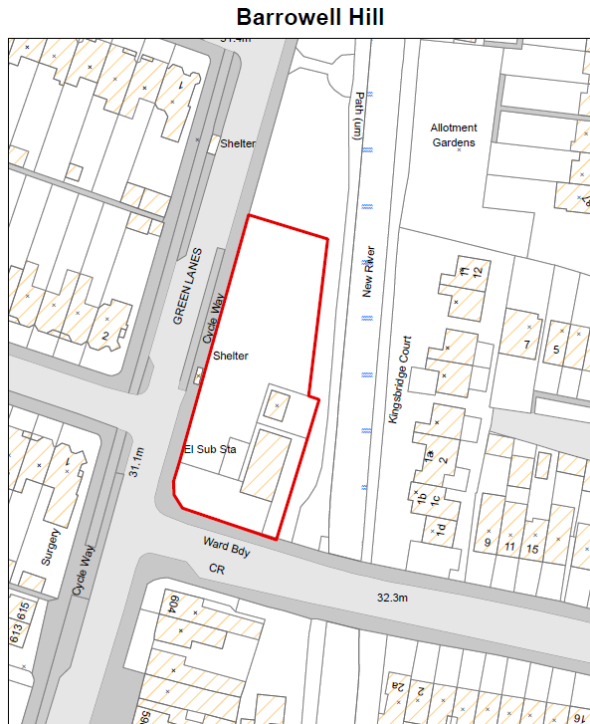
It is therefore considered that this very accessible site should be removed from the Green Belt and allocated for employment to help meet the high need in the Borough.

The HELAA estimates the site can provide 12,350 sqm of industrial or logistics floorspace. Thames Water consider this amount of floorspace is reasonable and deliverable and, therefore, this site can make such a valuable contribution to meeting employment land need in Enfield.

Specific Site Comments – Additional Housing Site

Depot at Barrowell Hill N21 3AR

Thames Water consider that the site as identified on the enclosed plan should be allocated for residential development.



The Council's HELAA 2021 also concurs that the site is '*potentially developable*' subject to a review of planning policy constraints and appropriate mitigation. It is considered that there are no policy constraints covering the majority of the site and therefore should be allocated.

The site is a disused depot, the majority of which is not covered by any designations. The site is previously developed land incorporating buildings and hardstanding which detract from the residential character of the area.

The site is surrounded by existing residential development and is sustainably located in PTAL 2 and is considered appropriate for around 15 dwellings (at a density of approximately 75 dwellings per hectare).

The site is located in Flood Risk Zone 1 (low level) and there are not known to be any technical constraints.

It is recognised that a small part of the site (strip adjacent to New River) is covered by a Site of Metropolitan Importance for Nature Conservation (SMINC) designation, but this does not need to be impacted by the redevelopment. Any necessary mitigation can be provided either on site or elsewhere on Thames Water's landholdings to provide biodiversity net gain.

It is considered that a well-designed residential scheme would remove the unsightly development and significantly enhance the site and the character of the surrounding area and setting of the New River (a Thames Water operational asset).

DRAFT STRATEGIC POLICY SP BG1 Enfield's blue and green infrastructure network

Thames Water object to the Wildlife Corridor designation covering the Thames Water sites at:

1. SA55: Land to North West Innova Park
2. Land south of William Girling Reservoir

Policy SP BG1 (i) sets out the aim of “*protecting and enhancing the Borough’s habitat and wildlife resources, including linking green spaces with identified wildlife corridors, protecting and enhancing species and habitats identified in the Blue and Green Infrastructure Audit and London Biodiversity Action*”.

However, neither of the above sites are covered by any existing wildlife designation and no surveys have been undertaken on the sites to justify why they are considered to be suitable for this designation. As such, this policy approach is not based on evidence.

The Innova Park site is proposed for allocation for employment under Policy SA55 and the land south of William Girling Reservoir has a Certificate of Lawfulness for waste recycling and therefore it is not appropriate to include the new wildlife corridor designation on these sites.

However, there would be the potential to create and enhance amenity use on parts of the site for biodiversity and other uses as part of any redevelopment proposals as set out above.

We would be keen to meet with the Council to discuss the above development opportunities and look forward to hearing from you in due course.

Yours faithfully,

Thames Water Utilities Limited