

## **Written Statement**

On behalf of Danescroft (FRELD Claverings) LLP  
(Representation ID 7417)

May 2025

## Introduction

- 1.1 Our client, Danescroft (FRELD Claverings) LLP (“Danescroft”), is the landowner of the Claverings Industrial Estate, Edmonton (“the site”), subject to Draft Site Allocation URB.32, as fully set out in Paragraph 3 of our Reg. 19 written representations<sup>1</sup>.
- 1.2 In April 2025, the London Borough of Enfield’s (“LB Enfield”/“the Council”) Planning Committee resolved to grant full planning permission for the comprehensive redevelopment of the site to provide 11,653 sqm (GIA) of flexible industrial and logistics floorspace (falling within Use Classes E(g)(ii)/(iii), B2 and/or B8) across seven individual units (LPA ref. 24/03805/FUL; “the resolved planning application”). Our client is currently in the process of agreeing the Section 106 legal agreement with the Council following which the resolved planning application is expected to be determined and delivered without delay.
- 1.3 The layout of the resolved planning application, designed to make optimum use of the site in response to market and occupier requirements, is shown in **Figure 1** below.



**Figure 1: Layout of the resolved planning application**

<sup>1</sup> See Enfield Local Plan 2019-2041 Regulation 19 Consultation Stage Representation Form on behalf Danescroft (FRELD Claverings) LLP, dated 17 May 2024 (Rep. ID 7417).

1.4 As a reminder, at Regulation 19 stage, our client has duly made representations to the emerging Local Plan (“the Plan”), raising the following matters:

- Strong *in-principle* support to the comprehensive redevelopment of the site which is considered available, suitable, achievable and developable;
- The allocation boundary should remove the Enfield Public Safety Centre adjacent to the site (which is understood not to be available for redevelopment at this point in time);
- A redevelopment of the site needs to be reflective of industrial/logistics market demand and occupier requirements;
- The allocation’s design principles should reflect key site constraints and be based on an optimised site layout which addresses key occupier requirements ensuring that the site can reach its full potential;
- Concern that the minimum site intensification requirement is prescriptive and unrealistic, not based on detailed feasibility testing and, ultimately, inconsistent with the flexibility advocated for by the National Planning Policy Framework (“NPPF”) (2023)<sup>2</sup> and London Plan (2021).

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<sup>2</sup> Under which the Plan is considered to be assessed. For the avoidance of doubt, the same flexibility and requirement for economic policies to pay regard to meeting needs/enabling a rapid response to changes in economic circumstances have been maintained (and expanded upon) in the NPPF (2024).

## Matter 7: Allocations outside Placemaking areas and the Green Belt

### Site Allocation URB.32: Claverings Industrial Estate

***Q7.1: Is there any substantive evidence to suggest any of the above sites should not be allocated based on one or more of the following factors, where relevant:***

- *biodiversity*
- *green infrastructure or agricultural land*
- *landscape quality and character*
- *heritage assets*
- *strategic and local infrastructure including transport*
- *the efficient operation of the transport network and highway safety*
- *contamination, air and water quality, noise pollution, odours, land stability, groundwater and flood risk*
- *open space, recreational facilities and public rights of way*

***Response:***

- 1.5 Given that there is a resolved planning application for the redevelopment of the site, our client does not consider that there is any substantive evidence that URB.32 should not be allocated due to any of the factors listed in Q7.1. The site has been demonstrated to be acceptable for employment-led redevelopment as part of the resolved planning application.

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***Q7.2. Are the development requirements set out in Appendix C for the above allocations consistent with national policy and justified and would they be effective in securing an acceptable form of development? In particular:***

***a) The scale and density of development. Is the amount of development proposed justified having regard to any constraints and provision of necessary infrastructure?***

***b) Infrastructure requirements.***

***c) Design principles.***

***Response:***

- 1.6 Our client continues to offer its strong support for the allocation of the site to seeks its employment-led redevelopment. As noted in Para. 1.2 above, an employment-led planning application for the site's redevelopment has indeed been resolved by the Council in April 2025.
- 1.7 However, our client regretfully noticed that its proposed modifications (included in **Section 6** of our Reg. 19 submission) to align the allocation with national policy (and the London Plan) were not reflected in the Council's proposed modifications [E6]. Whilst the Council indicated that it would welcome entering into a Statement of Common Ground ("SoCG") with our client, to date no attempt has been made to do so.
- 1.8 With regard to the *scale* and *density* of development, **Paragraphs 18-34** of our Reg. 19 submission are still applicable. Based on the Council's estimated existing floorspace for the site set out in the **Employment Land Review (2023)** [EMP1] of 16,258 sqm<sup>3</sup>, the required provision of an additional 3,219 sqm of employment floorspace is unrealistic and has not been informed by robust feasibility testing undertaken by the Council (also see **Paras. 18-20 & 23**). For the avoidance of doubt, other than through the provision of a number of 'industrial typologies' set out in the Council's evidence base (i.e. Industrial Intensification Report, 2020 [EMP3]), it is not considered that the requested net additional floorspace has been specifically tested for the site.
- 1.9 As part of the pre-application and planning application process, our client and its project team fully considered the site's constraints, opportunities and surrounding development context to test several development and intensification options, none of which were capable of realistically achieving the Council's estimated additional employment floorspace. This is fully illustrated in the Design and Access Statement (November 2024) prepared by Chetwoods accompanying the resolved planning application (and **Figure 2** below)<sup>4</sup>.

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<sup>3</sup> Note: A Site Audit Report, agreed by LB Enfield as former landowner, accompanying the resolved planning application identified the existing floorspace to be c.17,075 sqm (excl the Enfield Public Safety Centre which sits outside our client's landownership, but within allocation URB.32) of which 9,369 sqm were (last) lawfully occupied under an industrial/storage & distribution land use (as of November 2024).

<sup>4</sup> Note: The Design and Access Statement (p.45) also includes a feasibility testing for the potential redevelopment of the Enfield Public Safety Centre (as a future development phase) for small, potentially double-storey industrial and logistics scheme achieving c.720 sqm (GIA). However, whether the site is available and achievable is unknown.



**Figure 2: Extracts of Design and Option Testing in relation to minimum intensification figure contained in URB.32** (see Chapter 8 of the Design and Access Statement accompanying the resolved planning application for full details, p.28-33 & 44-45)

- 1.10 Based on the site's existing floorspace lawfully falling within an LSIS-/London Plan Policy E4-compliant use of 9,369 sqm and the proposed floorspace subject to the resolved planning application (11,653 sqm), a net intensification of c. 2,284 sqm has been achieved. Whilst the resolved planning application demonstrated that the floorspace may be further increased through the provision of full mezzanine floorspace (achieving up to 19,469 sqm), this would be subject to occupier/tenant requirements.
- 1.11 In short, and as set out in **Paragraphs 26-33** of our client's Reg. 19 submission, the allocation's minimum intensification requirement is overly optimistic and largely unrealistic and should therefore be removed or based on the site's true employment/industrial capacity, as demonstrated by the resolved planning application. The feasibility and options testing undertaken by our client since Reg. 19 stage goes way beyond the testing undertaken by the Council in the preparation of the Plan.
- 1.12 Separately, and whilst the resolved planning application demonstrated (as confirmed by the Council's Committee Report) that the site made optimum use of brownfield land responding to market needs/requirements, thereby complying with national policy (and the London Plan), it is not considered justified/in accordance with national policy to require (unachievable / untested) minimum additional employment capacity (i.e. **Chapter 6, Paragraph 84d** of the NPPF (2023)).
- 1.13 In relation to Design Principles, our client's position set out in **Paragraphs 14-17** of our Reg. 19 submission still stands and remains unchanged. The resolved planning application demonstrated that a deliverable form of development - which optimises the site's industrial capacity - should follow our suggested modifications.

***Q7.3. Is there a reasonable prospect that the site in question could be viably developed at the point envisaged?***

***Response:***

- 1.14 Yes, our client considers that the site can be viably developed ahead of the timeframe set out in Appendix C (5-10 years). Given that the Council resolved to grant planning permission for the site's comprehensive redevelopment (excluding the part of the site occupied by the Enfield Public Safety Centre), it is anticipated that the resolved scheme will be delivered within the 0-5 year timeframe delivering much-needed modern employment floorspace for LB Enfield and the local economy.

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***Q6.12. Where relevant, are the suggested modifications to allocations SA2.1 – SA2.8 set out in document E6.1 necessary to make the Plan sound?***

***Response:***

- 1.15 The principle of the suggested modifications to URB.32 set out in document E6.1 are acceptable to our client, albeit not deemed necessary to make the Plan sound (or necessarily in accordance with national policy).
- 1.16 In relation to Infrastructure requirement i), our client considers that the development *should* contribute towards transport infrastructure improvements where they are fully justified in accordance with **NPPF (2023) Para. 57** and any such contribution is *fairly and reasonably related in scale and kind to the development*.
- 1.17 It is noted with regret that our client's own suggested modifications (**Section 6** of our Reg. 19 submission) have not been considered/incorporated which are indeed considered necessary to ensure the Plan/URB.32 is sound.

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