



## EDMONTON LEESIDE AREA ACTION PLAN

### EXAMINATION

#### FINAL

### Hearing Position Statement

#### Matter 2: Employment

Issue: Whether the policies in the plan accord with the aim of the Framework, to contribute to a strong, responsive and competitive economy?

#### **i. Are the proposed employment projections at Meridian Water justified and based on sound evidence?**

Policy EL2 of the AAP aims to deliver 6,000 to 7,000 net new jobs.

*'Evidence Base for Employment Land, Industries and Jobs'* (AECOM, Nov 2016) provides an assessment of the future long-term employment growth forecasts and the type of employment opportunities which redevelopment at Meridian Water (MW) could support.

The report aims to illustrate whether the scale of employment growth envisaged could be supported by analysing:

- Employment forecasts over the long term (GLA Economics London Labour Market Projections, June 2016): The growth potential of the wider economy within which Meridian Water is located, in terms of employment forecasts; and
- The potential of MW to capture economic growth: In light of the wider growth and the additional factors driving a step change in demand, the potential for Meridian Water to capture a significant proportion of economic growth considering:
  - o Demand-push factors for industrial and office provision; and
  - o Demand-pull factors such as the characteristics and assets of a regenerated MW.

Though employment forecasts are trend based and so future projections are defined in part by the historic performance of sectors, as well as being shaped by place specific factors (such as supply conditions, accessibility, perception of place etc.), they provide a useful starting point and context for the growth potential in terms of scale and rate of change. The analysis of forecast employment change is conducted across an area which has economic linkages, primarily due to its highway and public transport network connectivity allowing for strong flows of services, products and labour: LB Enfield, the surrounding boroughs and inner London's office market. GLA Economics forecasts projects employment across sectors relevant to the MW vision (office, retail/leisure, administration support

and industrial) to grow by 13,400 within LB Enfield, 57,300 across key surrounding boroughs, and by 160,000 in inner London between 2016-2036. In addition, Enfield's position within both the Stansted-Harlow-Broxbourne and the London-Stanstead-Cambridge Corridor London life science clusters means it is also well located to benefit from the anticipated growth in the life sciences sector (11,000 new jobs projected in the LSCC between 2013 and 2023).

These figures suggest there is good growth potential across the wider area. MW has the potential to capture this growth because of:

- The supportive policy and strategy context (in addition to the alignment with Council policy, the London Plan, Upper Lee Valley Opportunity Area Planning Framework, and London Stansted Cambridge Corridor Consortium LSCC Prospectus also support substantial growth in new homes and jobs);
- How the development scale (bringing about critical mass), regeneration and infrastructure investment (with West Anglia Mainline four tracking and the potential for Crossrail 2 leading to improved journey times, capacity improvements and wider network connectivity) could promote and support the location as a place to do business; and
- How trends in the commercial property market (such as out migration of businesses driven by land and property prices) could favour demand for outer London locations, such as Meridian Water.

The report also considers those characteristics which can help distinguish between the attractiveness of places for large scale high quality office provision. These include factors such as the potential for expansion; public transport connectivity; proximity to Central London core market; availability of social and cultural infrastructure; and affordability. The report suggests that MW compares favourably with other outer London locations, highlighting advantages including potential for expansion, affordability, improving public transport accessibility and planned improvements to social and community infrastructure.

Taking these factors into account the report concludes that, on balance, there is positive evidence to show that Meridian Water is positioned to capture a critical level of demand to fulfil the Plan's objective for a net gain of 6,000 jobs on site.

In terms of spatial layout, urban design and density, the KCA '*Scenario Testing*' report [ELAAP 14] shows that this level of jobs would be compatible with the delivery of around 10,000 new homes and supporting infrastructure, provided a greater mix of uses can be achieved by a flexible approach to currently designated industrial areas of the Meridian Water site.

The transformational nature of change at Meridian Water inevitably means some degree of uncertainty over future outcomes, particularly when this involves attracting private sector businesses to establish their operations in the area. However, the Council's view is that the AAP meets the requirements of NPPF paragraph 16b that '*Plans should be prepared positively, in a way that is aspirational but deliverable*', and that the evidence shows that Meridian Water has the potential to support a net provision of 6,000 new jobs should it be able to capture a share of the economic growth forecast across the wider area. The AAP is the policy framework to underpin and facilitate these aspirations.

**ii. What would be the effects of the loss of 9.5 hectares of land designated as Strategic Employment Land (SIL) on employment in the Borough and on the wider area?**

Whilst paragraph 6.4.4. of the submitted Plan proposes release and de-designation of the whole of Harbet Road SIL land at Meridian Water, the general conformity issue raised by the GLA on de-designation relates to the northern section of Harbet Road, north of the proposed central spine route, referred to as ‘the Causeway’. The northern part of Harbet Road is a particularly valuable location due to its accessibility onto the strategic road network. The southern portion (south of the proposed route) would be seen as more suitable for de-designation subject to intensification, consolidation and co-location of industrial uses as in accordance with the draft London Plan.

The Edmonton Leaside AAP now provides for a position of no net loss in land in accordance with current London Plan policy. The new allocations put forward are entirely consistent with national and London Plan policies. They provide for SIL land in the Lee Valley corridor, particularly in the major industrial and warehouse corridor between the North Circular Road (A406) and the M25 in Enfield as identified in the most recent London Industrial Land Demand Study<sup>1</sup> supporting the emerging draft London Plan. Of note, industrial land to the south of the North Circular Road, i.e. within the Meridian Water boundary is given no such mention.

The de-designation of SIL land at Meridian Water is not intended to preclude ‘B’ uses in the future rather, the proposed release builds on the natural strengths of the location, addresses a key strategic priority for the GLA and London (supporting industry, technologies and new production) but also enables an employment offer to compliment new residential areas, the flexibility and mix of which is so vital to making a successful place at Meridian Water (alongside a range of other place attributes).

As set out in Policy EL2, the ELAAP seeks delivery of net new jobs, achieved through mixed-use developments and a more intense usage of land at Meridian Water. This is in line with the policy approach of the new draft London Plan Policy E5 which states that “Boroughs, in their Development Plans, should: define the detailed boundary of SILs in policies maps having regard to the scope for intensification, co-location and substitution”.

As set out in the statement of common ground being prepared in cooperation with the GLA, the AAP now proposes to designate sufficient new Strategic Industrial Land, (i.e. hectares) to more than replace the area of SIL land lost. In addition, the Council brings forward evidence of the likely scope of intensification and co-location which will replace the SIL floorspace lost, even when discounting the designation of Deephams Sewage Treatment Works. Finally, and in addition to this, the emerging Meridian Water Masterplan proposes extensive employment floorspace outside of SIL, mostly at the ground floor levels of proposed mixed-use development, bringing forward high density and quality employment through B1 office and other uses compatible with colocation of residential uses.

Currently existing SIL sites (Harbet Road) and some other LSIS or non-designated sites are vacant or have low rates of utilisation with a degree of vacancy, inefficient build or site use. As such there is significant potential for intensification of industrial land over the long term, under the right planning and property market conditions and demand-supply environment. As the demand-supply conditions tighten over the long term (assuming the trend of supply contraction over and above demand contraction continues) sites designated as SIL in ELAAP will become more intensively used (at higher employment densities) and will support a net increase in employment, both at Meridian Water and beyond its boundary. In addition there could be growth in non B use class employment. For example, there will be significant retail, school-related, leisure, cultural and other employment opportunities to support the residential-led mixed-use development proposed at Meridian Water and in the wider ELAAP area.

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<sup>1</sup> London Industrial Land Demand Study (CAG Consultants October 2017)

De-designation and redevelopment of Meridian Water SIL would displace some existing jobs and the estimated effect of this is shown in the AECOM report '*Evidence Base for Employment Land, Industries and Jobs*', Table 3.2. For the entirety of the Harbet Road Industrial Estate of 18ha some displacement of jobs could be expected, though relatively limited (compared to its potential site capacity) as a large proportion of the site is currently cleared in preparation for redevelopment. There could be potential however for local businesses displaced through the redevelopment of MW to be relocated to other local SIL and other employment sites, and this process is expected to be supported strongly by the Council. The new proposed ELAAP strategy of replacing SIL floorspace lost through intensification, in combination with other employment uses coming forward as part of mixed use development at higher employment densities than industrial, will result in a substantial net increase of employment which is an overriding priority objective of the Plan.

### **iii. How could its retention support Meridian Water?**

Meridian Water is one of the largest brownfield redevelopment opportunity in London and a significant regeneration opportunity in the Upper Lee Valley. MW is a transformational regeneration project which will bring about significant benefits beyond its boundaries. To maximise benefits in terms of homes, jobs and environmental improvement, the Council is approaching Meridian Water in a proactive, plan-led way.

The re-designation of SIL land within MW has been designed to maximise these benefits. Retaining the SIL designation would reduce the density and quality of housing and supporting infrastructure, including transport and access, otherwise achievable and necessary to support comprehensive redevelopment. It would also decrease the flexibility to bring forward a greater variety of higher density employment as part of mixed use redevelopment. It is for these reasons that the ELAAP seeks the of Meridian Water site to be available for a mix of uses.

Additionally, the Council is now proposing, through a statement of common ground being prepared in cooperation with the GLA, to retain some further sites within the ELAAP boundary as strategic industrial land, as well as designating some new replacement SIL, in strategic locations most suitable for continued industrial use (e.g. next to the North Circular Road). This approach would allow for a proactive, plan-led approach of managing retention, replacement and intensification of SIL, in a manner which would still leave the Council sufficient mixed-use land with the flexibility to carry out comprehensive, mixed use redevelopment.

Through the provision of much needed workplaces, new homes, local facilities and supporting infrastructure, Meridian Water will create a thriving new economy in the Lee Valley. Meridian Water will retain and enhance the presence of industrial sectors, manufacturers, creative/sustainable production and logistics in the Lea Valley hungry for space and providing a unique opportunity to be close to a network of business communities. The longer-term targets currently under investigation include a large-scale education occupier, an urban business park, life sciences, advanced manufacturing and media/studio.

Allowing appropriate commercial uses to mingle amongst residential and community uses in these mixed-use areas, will not only provide far better environmental quality for residents and workers, but also underpin the provision of more and higher quality jobs in an area historically characterised by high levels of deprivation. The SIL designation for the purpose of a transformational project like Meridian Water is restrictive in only allowing B-uses and the ELAAP provides the critical opportunity to open up Meridian Water's potential for a greater density, quality and variety of employment. In summary, therefore, it is not considered that the full retention of SIL land, as it is located at the

moment, in comparison with the new plans put forward by the Council for replacement and intensification, could support the redevelopment of Meridian Water in any way; rather, its retention in its current form, significantly reduces Meridian Water's market potential as a development opportunity, thus increasing the chances that the area would remain under-developed and under-used despite the evidenced demand for new homes, especially affordable homes, and jobs across Enfield and beyond.

**iv. Could these effects be mitigated by the other SIL designations proposed in the plan? How are these justified? Would the size and position of the other 2 pieces of land render them useful/appropriate for SIL?**

*Could these effects be mitigated by the other SIL designations proposed in the Plan?*

Chapter 6 of the submitted Plan talks at length to the commitment of supporting the borough's strategic industrial heritage and presence (for which it has a natural competitive advantage due to location, access and quality of stock). In the best interests of its residents and business community the Action Plan is also committed to diversifying and intensifying employment bases to also unlock higher value sectors and opportunities.

The replenishment package of SIL designations put forward, as well as Policy EL15, new will provide an opportunity for the redevelopment and intensification of these industrial estates, including at the Council-owned Montagu Road Industrial Estates, where investment can improve outdated infrastructure. This approach supports the new draft London Plan policies regarding intensification and more efficient use of industrial land.

Discussions are being held with the GLA regarding new allocations and aprtial retention of SIL within the Plan now encompass a total of 44.3 hectares (ha). The current view of the Council is for SIL provision to comprise the following parcels of land:

- Parcel to the north of Pickett's Lock Lane (2.1 ha)
- Two parcels of land to the east of Pickett's Lock Lane (2.0 ha)
- Deephams Sewage Treatment Works (34.0 ha)
- North East corner of Harbet Road (currently SIL but vacant and measuring 1.5 ha)
- Strip of land to the north of the Ray's Road open space (1.0 ha)
- North side of Montagu Industrial Area South (1.9 ha)
- Proposed intensification of Montagu Industrial Area North (currently SIL measuring 9.6 ha); and
- Kenninghall Site (3.3 ha).

The ultimate position on exact areas and measurements will be finalised in discussion with the GLA.

The total area of these sites measures significantly more than the area of SIL proposed to be lost at Harbet Road (16.5 ha). This will provide for a net increase of 27.8ha in SIL land.

The measurements provided above are made in terms of land. However the New Draft London Plan policy regarding industrial provision places increased emphasis on capacity (perhaps best measured as floorspace, including supporting space such as yards), recognising that land may be used at different levels of intensity. As such the designation of land as SIL is not only about land gained or lost but also about the ability of the newly designated SIL sites to be used at a level of intensity which offsets and improves on the current levels of SIL capacity (or assumed levels of capacity).

*How are these justified?*

The justification for these other SIL designations is that a larger overall area can be protected from development as non-industrial uses (AAP paragraph 6.4.4) while at the same time consolidation can occur. The sites were selected as most suitable for designation as Strategic Industrial Land due to their characteristics (such as location, proximity and access to the North Circular Road, seclusion from sensitive receptors such as residential areas, strategic importance to the wider area etc), while allowing for sufficient land to remain to enable pursuit of a more flexible mixed-use redevelopment strategy across MW.

Consolidating the other SIL designations as an extension of the existing area of SIL which includes the Eley's and Aztec industrial estates and EcoPark will promote a more efficient use of land by providing greater clarity to developers where industrial activities should locate which would promote intensification opportunities.

The strategy of replacement, consolidation and intensification of SIL proposed is supported by Policies E5 and E7 of the emerging London Plan. Policy E5 states that Boroughs should, in setting SIL boundaries, 'have regard to scope for intensification, co-location and substitution' of SIL Land. Policy E7 states that 'intensification should facilitate the consolidation of the identified SIL to support the delivery of residential and other uses, such as social infrastructure'. The AAP thereby takes a proactive stance to encourage intensification.

Likewise, paragraph 2.85 of the adopted London Plan notes that 'in...parts of North London there is particular scope for strategically co-ordinated consolidation and/or reconfiguration of parts of some SILs. Release of surplus industrial land should be focused around public transport nodes....to enable higher density redevelopment, especially for housing'.

Some of these points are broadly restated in the emerging London Plan (see paragraphs 6.5.1-6.5.3).

*Would the size and position of the other 2 pieces of land render them useful/appropriate for SIL?*

The land parcels proposed to be designated or retained as SIL (see above) are readily accessible by road and provide sites which are either currently in industrial use or have been in the recent past. A number of these sites are set away from sensitive receptors such as residential areas and would enable 24hr access and working. In addition, clusters such as Montagu Road North and sites immediately to the south are bounded by rail and A-roads which generate adverse effects (air quality and noise) and therefore opportunities exist to intensify those frontages to deliver an increased capacity of industrial activity.

The 2 parcels of land provide for some 2ha of underused industrial land and as a cluster alongside Deephams STW provide for a greater quantum of safeguarded industrial land entirely consistent with existing and emerging policy related to utilities and waste uses suitable to SIL. As a cluster of sites including adjacent existing and other new proposed designations, they have the potential to facilitate moves towards a more comprehensive industrial land offer. The resulting supply of sites could support a move towards circular economy and related industrial activities.

In summary, the effects of the loss of SIL at Harbet Road could be mitigated and justified by the other SIL designations proposed in the Plan, in a plan-led, proactive way, which will also allow for additional higher density, quality and variety of employment on more flexible mixed use sites alongside the SIL designations.

**v. What is the rationale behind the designation of land at Deephams Sewage Works as SIL? Is this realistic given Thames Water's stated aim of keeping the site operational, what aim would it achieve?**

The AAP recognises that the Deephams site will continue in ongoing use as an operational sewage treatment works, with Chapter 9 of the document supporting the site in this usage. This is also enshrined in a statement of common ground being prepared in cooperation with Thames Water, who agree that the designation is in line with the appropriate uses for SIL as set out in the London Plan.

The Plan's intention to designate Deepham's STW as SIL is not with the intention to seek to provide additional industrial capacity, but is rather to conform with existing London and National Policy on designating waste and utility uses as appropriate uses within SIL areas and in doing so safeguards a strategic North London operational sewage treatment works.

The Council considers that designation of Deephams STW as SIL would improve conformity with the London Plan which specifically references waste management as an appropriate land use for SIL, as set out in Policy 2.17 and paragraph 2.79 of the 2016 London Plan, and Policies E4 and E5 of the draft London Plan (2017), the latter of which also references utilities infrastructure as a suitable use within a SIL designation. Designation of Deephams as SIL will also be in conformity with draft London Plan policy SI9, which requires the safeguarding of existing waste sites and retaining them in waste management use. This last policy in particular indicates that the current situation, whereby Deephams occupies unsafeguarded 'white land', could be improved on by this designation. Finally, the Environment Agency, in its submission to the ELAAP, states: 'We strongly recommend a plan wide policy to safeguard the waste capacity provided by sites in the plan area including mechanisms for relocation and improving environmental quality. There are a total of 37 waste sites in the plan area which collectively manage a large tonnage of waste – approximately 1.4 million tonnes, received not just within Enfield and London, but across the country. The Edmonton EcoPark provides around half of this capacity but the rest is provided by other permitted waste sites in the area.

Deephams is one of the waste sites that the EA would like safeguarded and, on the basis of the London Plan policies referred to above, designating it as SIL is considered the most straightforward and appropriate way to do so.

Designating Deephams STW as SIL will have the additional benefit of extending northwards the existing area of SIL which lies to the south - and includes the Eleys and Aztec industrial estate and EcoPark – to create a single, consolidated area of industrial land which also includes the sites to the north and east of Pickett's Lock Lane (see answer to iv for an assessment of the benefits of consolidation). This is also in line with the North London Waste Plan Regulation 19 draft soon to be published for consultation and currently available on the Enfield Council website.

**vi. Does the plan appropriately recognise the potential contribution of jobs from retail?**

The ELAAP recognises the potential to create new jobs in retail in paragraphs 5.12, 5.3.20, 5.3.26, 5.4.9, 5.4.10 and 5.4.12. Paragraph 5.4.10 notes that retail is expected to comprise 12% of all new jobs generated by the plan. Furthermore, the Schedule of Minor Amendments adds the sentence that '*The Meridian Water location already provides many jobs that are predominantly in the retail sector*'.

Meridian Water already includes 1,100 retail jobs, as noted in paragraph 5.4.4 and recognised in the document '*Evidence Base for Employment Land, Industries and Jobs*', Table 3.2. These jobs are located in the large retail stores of Ikea and Tesco, and within the outlets on the Ravenside Retail Park. Added recognition of the contribution of these existing retail activities are going to be enshrined in new

wording proposes as part of a statement of common ground, currently being prepared in cooperation with Ikea.

While retail jobs form a significant element of the existing Meridian Water jobs base and planned net job increase, Meridian Water will seek to complement rather than compete against surrounding district centres, as set out in the ELAAP Section 5.5 and Policy EL3, having regard to parallel but separate investment in neighbouring centres such as Edmonton Green, Northumberland Park and Tottenham. It is envisaged that shops will largely cater to local needs, although there is potential to develop a café and dining culture, especially around the unique watercourse features of the area.

Additionally, Policy EL4 on the Ravenside Retail Park is clear in recognising the appropriate contribution of jobs from retail, seeking for the Retail Park to be retained and enhanced, thus supporting the current importance of retail jobs in this location, and indeed maximising opportunities for potential future growth through improved access and improvements to the public realm. Policy EL4 makes a particular contribution to supporting jobs in comparison retail to complement the new convenience retail proposed across the rest of the Plan area.

Policy EL6 and paragraph 5.8.5 also both recognise the importance of retail use as a contributor to the vibrancy and sense of place of the proposed Causeway, maximising its function as a place for interaction and communities.

Finally, the proposed mixed-use development, including significant housing numbers, will support the viability of operations of both existing as well as new retailers by increasing their potential local customer base.

**vii. Does the plan take appropriate measures to support employment uses within the plan area, including those outside Meridian Water?**

The support of employment within Meridian Water is covered by the detailed responses to items (i), (ii), (iii) and (xi).

The Edmonton Leaside area contains large areas of designated industrial land (both SIL and LSIS), and the ELAAP provides appropriate support for industrial employment uses, particularly through Chapter 6 '*Edmonton Leaside Employment and Industrial Estates*'.

Policy EL15 seeks to improve the environment on existing industrial areas, for example in terms of the quality of the public realm, traffic circulation, car parking and accessibility for pedestrians and cyclists. The improvements in transport and connectivity are further supported through Policy EL21 '*Improving the Quality of the Pedestrian and Cycling Environment*', EL22 '*Proposed Route – Improvement Principles*', EL23 '*Enhancing the Bus Network and Services*', EL24 '*Use of the Waterways for Transportation*' and EL25 '*Design of the Road Network*'.

Policy EL14 extends the area of designated industrial land to further protect land for suitable industrial uses, including utility uses.

Chapter 7 and Policy EL16 set out changes to the Angel Road Retail Park area, establishing this as a new location for employment mixed uses. This will include integrating with and supporting local business, particularly at the adjacent Eley's Industrial Estate, through improving the public realm and providing opportunities for business-supporting uses.

The new mixed use employment areas are planned to offer much higher quality, density and variety of employment, in an area with historically high levels of deprivation and access to only a limited pool of jobs.

**viii. Are the employment policies in the AAP consistent with the aims and objectives of the Local Development Framework?**

Enfield's key Local Plan/ LDF documents are the Core Strategy (2010) and Development Management Document (2014).

The Core Strategy sets out Strategic Objectives, of which three are particularly relevant to the issue of employment in the Edmonton Leaside AAP and are summarised below.

- Objective 1 *Enabling and focusing change* – to meet the needs of Enfield's existing and future population by focusing transformational change and growth in the Upper Lee Valley.
- Objective 6 *maximising economic potential* – maximising the economic potential of the Upper Lee Valley, enhancing appropriate employment locations and ensuring a more efficient use of land. To support new business enterprises, inward investment and economic diversity and promote higher wage growth sectors such as knowledge based industries.
- Objective 7 *Employment and skills* – to support job creation and address the levels of unemployment and economic inactivity particularly in the south and east of the borough, including amongst young people and disadvantages section of the community.

Core Policy 13 seeks to protect and improve Enfield's employment offer and identifies the Upper Lee Valley – where Edmonton Leaside is located – as a focus for the new growth. The policy states that the Edmonton (previously 'Central') Leaside area must undergo significant policy intervention to achieve transformational change to position the area as somewhere attractive to growth sectors such as creative industries and business services.

Core Policy 16 commits the Council to tackling worklessness and creating new jobs and working to ensure that local residents are able to access these jobs. This is particularly important around Edmonton Leaside where there are higher levels of unemployment and deprivation.

Core Strategy policies 37 and 38 address the AAP and Meridian Water areas and support retaining the industrial and employment character across the majority of the AAP area. The ELAAP increases the number of jobs above that established in the Core Strategy due to the need to achieve more jobs, and higher value jobs, to tackle worklessness and deprivation in the area, and provide jobs for the new population at Meridian Water.

While the policy positions within the Core Strategy and Development Management Document (2014) are protective of SIL, it is the purpose of the Area Action Plan to provide a detailed and more proactive policy approach for this specific locality. The Council is complying with the London Plan approach which requires that de-designation of SIL must be through the plan-making process.

For the reasons discussed above, the ELAAP policies relating to employment, in particular EL2 and EL15, can therefore be seen as consistent with the overall aims, objectives and policies of the Council's adopted Local Plan/ LDF document.

**ix. How will the plan respond to the business needs of existing businesses, within the Plan area?**

The response to item (vii) above describes how the AAP supports existing employment-generating businesses across the Edmonton Leaside area. Part D of Policy EL15, and paragraphs 6.5.19 and 14.2.8, set out the requirement for the Council to support businesses where relocation is required.

Within the Meridian Water area, redevelopment will mean change for some businesses, potentially including relocation. At the Harbet Road Industrial Estate there is a special need to ensure the functionality provided by the Arriva bus depot in supporting north London's transport infrastructure continuing seamlessly in the event of relocation – as detailed within the ELAAP at paragraph 5.4.19.

The AAP is also responding to the business needs of existing employers in the area, by reassuring existing local businesses that their needs are recognised and will be taken into account. This will be enshrined in statements of common ground currently being prepared in cooperation with Ikea and Aytan's.

**x. Does the Plan adequately reflect the need to protect key wharfs and the road access to them?**

The Edmonton EcoPark Planning Brief (2103) considers the potential to bring a wharf on the River Lee Navigation back in to use for the purpose of serving the EcoPark facility.

*The Council is currently in dialogue with both the NLWA and TfL regarding any minor modifications through Statements of Common Ground that may provide greater protection and promotion of water borne freight.*

**xi. Would the wording proposed in policy EL2 be an effective means of achieving the aims and objectives of the Plan?**

Policy EL2 largely relates to achieving the aims of ELAAP Objective 2, through supporting the development and growth of new industrial sectors at Meridian Water, particularly of high job-density, high value-added sectors.

The policy establishes a realistic, achievable set of actions aimed at supporting the delivery of new jobs at 6,000 to 7,000 FTE, based on the evidence as discussed in item (i) above. To achieve this level of new jobs, Policy EL2 is clear that the development of appropriate supporting infrastructure and the removal of restrictive industrial designations in certain locations will be necessary, because they are spatially not compatible with the economic development proposed through Objective 2.

Policy EL2 both requires and supports transformational change, seeking a more efficient and effective configuration of land which supports a stronger and more diverse economy. The policy sets out the need for intensification of land uses, including through the introduction of multi-storey buildings, and requires development proposals to demonstrate high quality and innovative design which allows mixed uses through not compromising the viability of other activities and developments, including residential.

For these reasons, it is considered that the wording of policy EL2 comprises an effective means of achieving the aims and objectives of the Plan.