Enfield FEMA Study

Final Report

London Borough of Enfield

June 2020

Quality information

Prepared by	Checked by	Verified by	Approved by
Monica Laucas Consultant	Jake Billington Senior Consultant	Jon Howells Associate Director	Jon Howells Associate Director

Revision History

Revision	Revision date	Details	Name	Position
V1	14th April 2020	Draft Report	Jon Howells	Associate Director
V2	19th June 2020	Final Report	Jon Howells	Associate Director

Prepared for:

London Borough of Enfield

Prepared by:

AECOM Limited
Aldgate Tower
2 Leman Street
London E1 8FA
United Kingdom
aecom.com

This report has been prepared while in the UK COVID-19 lockdown. While the full implications of this on the content of this report are not yet known, there may well be medium and long-term implications for Government, Mayoral and/or Borough policies and the relative funding priorities as currently set out in this report.

At the time of writing, the draft London Plan was available as an 'Intend to Publish' version which was submitted by the Greater London Authority to the Secretary of State for approval on 9 December 2019. On 13 March 2020, the Secretary of State issued a Direction pursuant to s.337(6) of the Greater London Act 1999. The Direction prevents publication of the London Plan until a range of matters are addressed to the satisfaction of the Secretary of State to achieve consistency with national policy. On 24 April 2020 the Mayor wrote to the Secretary of State seeking to resolve the issues that have been raised by the Secretary of State through discussion by their officials, so as to enable the London Plan to be adopted. It remains open to the Mayor - should he conclude that inadequate progress is being made with the Secretary of State - (i) to challenge the Direction by bringing a claim for judicial review, on or before 12 June 2020; or (ii) to abandon the plan.

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1. Introduction

1.1. Purpose of the study and context

1.1.1. The London Borough of Enfield (LBE) are currently working on the preparation of the next stage of their new Local Plan[1]. The Council has started work on a new Local Plan to start planning a good growth up to the period between 2018 to 2036[2]. As part of the supporting technical evidence base preparation, LBE has commissioned AECOM to prepare this report, which presents the outputs of two assessments. Firstly, it provides a review of the London Borough (LB) of Enfield's Functional Economic Market Area (FEMA) that was identified in the Borough's 2018 Employment Land Review (ELR). It then provides an assessment of the potential for substitution of industrial employment land between Enfield and other local authorities (LAs) in its FEMA to assist in meeting the strong forecast need for industrial land in the Borough identified in the ELR, and in alignment with regional planning policy.

1.1.2. Put broadly, FEMAs aim to encapsulate areas in which there are significant economic linkages. The concept of a FEMA was introduced in UK planning practice guidance (PPG), but due to the wide range of factors which resemble economic linkages between areas, this guidance does not offer a standardised approach to identifying FEMAs. It instead provides a list of indicators which point to economic linkages, including areas which people travel to work within and how areas are connected by transport infrastructure. This report uses this guidance as well as professional judgement to understand Enfield's economic linkages to other boroughs and identify its FEMA.

1.1.3. The PPG[3] states that the need for employment (and housing) land in a local authority should be assessed in the context of its FEMA. As part of several proposed measures that London Boroughs are directed to follow to ensure that boroughs industrial land needs are met, Policy E7 of the draft New London Plan (dNLP) requires boroughs to explore opportunities to substitute land requirements with others or with LAs in the wider South East region. The policy references local authorities outside of London as being particularly attractive opportunities to substitute land due to the presence of a significant amount of industrial and logistics capacity available in these areas. Therefore given Enfield's position at the boundary of Greater London it is especially important in understanding how employment land needs are met that the spatial extent of Enfield's FEMA is confirmed and mapped.

1.1.4. In respect of industrial land needs the 2018 ELR concluded that forecast demand for industrial land is considerably in excess of levels of existing supply, with net additional land demand for industrial uses amounting to 48.6ha to 2036 – the Local Plan period. The report stated that even if all vacant land in the Borough were to be taken up and every development concerning industrial land in the pipeline came forward, there would remain a net requirement for approximately 6.8 hectares of additional industrial land to meet demand. Therefore even under this optimistic position, where all known supply options come forward, the additional unconstrained land requirement is not met.

1.1.5. In order to understand what is achievable in terms of how this requirement can be met, there is a need to further investigate, in line with the relevant aspect of DNLP Policy E7, the extent of the potential for substitution of Enfield's industrial land need with other authorities within its FEMA. This report therefore presents an analysis of the opportunity and potential for substitution with the local authorities (LAs) in

[1] Local Plan Review - https://new.enfield.gov.uk/services/planning/local-plan/#1
[2] Regulation 18 Local Plan - https://new.enfield.gov.uk/services/planning/enfield-draft-local-plan-2036-planning.pdf
[3] PPG (2019), MHCLG. Paragraph: 019 Reference ID: 61-019-20190315.

Enfield's FEMA based on, firstly, a re-examination of what this area comprises and, secondly, a review of the available evidence relating to industrial employment land produced by the local authorities within it.

1.1.6. The analysis which has been conducted in preparing this report, and the evidence-based documents which the analysis is based on, pre-date the emergence of COVID-19. It is not possible to predict whether the impact of the outbreak will significantly alter the conclusions of this report. However it is considered that the nature of the two assessments is such that any material changes resulting from the impact will occur over the longer-term by which time the findings of the assessment would need revisiting to reflect a range of possible changes to the analysis independent of the outbreak.

1.2. Report structure

1.2.1. This report is principally structured into the two assessments identified above, as follows:

- Section 2: Identifying Enfield's FEMA
    - Approach
    - Analysis
    - Enfield's FEMA
- Section 3: Potential for substitution in the FEMA
    - Approach
    - Analysis
- Section 4: Conclusions

2. Identifying Enfield's FEMA

2.1. Approach

2.1.1. The 2018 ELR identified a FEMA comprising of the following LAs: Barnet, Broxbourne, Epping Forest, Haringey, Hertsmere, Waltham Forest; and Welwyn Hatfield. This assessment reviews this FEMA based on professional judgement and PPG guidance to ensure that this it is most appropriate in the context of the assessment of substitution opportunity.

2.1.2. As stated in section 1.1.2, the PPG provides a list of indicators to be used to identify the extent of a FEMA. The list is not exhaustive, and the PPG recognises that the factors used to identify a FEMA will vary based on the nature of the assessment being carried out. The indicators identified in the PPG are as follows:

- *"The extent of any Local Enterprise Partnerships (LEP) with the area;*
- *Travel to work areas;*
- *Housing market area;*
- *Flow of goods, services and information within the local economy;*
- *Service market for consumers;*
- *Administrative area;*
- *Catchment areas of facilities providing cultural and social well-being; and*
- *Transport network*".

2.1.3. The 2018 ELR identifies that Enfield has a large industrial land market and a comparatively small office floorspace market. The Borough's industrial areas cater for a considerable number of large businesses which serve the wider London market, particularly in the logistics, warehousing and food and drinks processing sectors. The market also caters for small and medium sized enterprises (SMEs) serving the local area and overall the business base using industrial land in the Borough is vast in scale and varied in activity. In contrast, the Borough's office market comprises mostly SMEs serving the local area and the market is dominated by smaller units and floorplates

2.1.4. Subsequently, Enfield's economic links to other LAs are dominated by industrial activity. Businesses using industrial land require good access to the strategic road network and there is a high volume of goods and services moving between industrial areas in Enfield and industrial areas elsewhere.

2.1.5. With the above information in mind, the assessment provides an analysis of the FEMA based on the following factors:

- the extent of any partnerships with other LAs such as strategic corridors;
- where Enfield's employees travel from and where its residents travel to access work;
- links to other LAs via strategic roads and the public transport network;
- flow of goods, services and information between employment land in Enfield and employment land elsewhere;
- any commercial property market areas which Enfield is within; and
- similarities in characteristics between Enfield and other LAs.

2.2. Analysis

2.2.1. For each factor listed in section 2.1.5 above, the following section provides an analysis of LB Enfield's links to other LAs to determine what the Borough's FEMA should be.

Partnerships with other local authorities

2.2.2. Enfield is part of the UK Innovation Corridor (formerly known as the 'London Stansted Cambridge Corridor'). The corridor is characterised by the presence of businesses in the advanced technology and bioscience industries which is promoted via a partnership between the public and the private sectors.

2.2.3. The corridor starts in London and encompasses five other London Boroughs (London Borough (LB) of Hackney, LB Haringey, LB Islington, LB Redbridge and LB Waltham Forest). It spans through three LAs in Hertfordshire (Broxbourne, East Hertfordshire and Stevenage), three in Essex (Uttlesford, Harlow and Epping Forest) and two in Cambridgeshire (Cambridge and South Cambridgeshire) before ending in Peterborough.

2.2.4. The region has a fast-growing economy. The London-Stansted-Cambridge Corridor (LSCC) Growth Commission, in their report on economic performance in the corridor[4], state that the region has grown by 4.9% per annum on average, compared to 4.1% in the UK. The report notes private sector firms, including those in professional and administrative services and science, technology and IT industries, are growing particularly fast and contribute to a larger share of the economy in the Innovation Corridor than they do in the UK.

2.2.5. Hertfordshire County Council has a prominent role in shaping growth in much of the UK Innovation Corridor relevant to Enfield, with its Hertfordshire Infrastructure and Funding Prospectus (HIFP)[5] providing a overview of the wider spatial economic context. Among the findings of this work is the reinforcement of the importance of the UK Innovation/LSSC Corridor within the county and the confirmation of the locally relevant growth corridors within Hertfordshire. The work of the Hertfordshire Growth Board involves building on the HIPF in shaping the delivery of good growth and economic success in the county, including currently examining the role of two "East-West" corridors, the southern of which interacts with Enfield.

2.2.6. The ability of firms in the advanced technology and bioscience industries to cluster in the Corridor area creates productivity benefits. They require links with local suppliers and a highly skilled local workforce, and they benefit from partnerships with public authorities. The presence of these firms contributes to strong economic links between LAs within the corridor. It encourages the flow of knowledge, labour and goods and services between these LAs, buoyed by presence of several major universities, the strong regional road and rail networks and a highly skilled labour force. A number of these firms are based at Innova Park in Enfield, which is the location of several high-profile technology firms providing software and manufacturing solutions for enterprises across the country but primarily in other parts of the Innovation Corridor. Other LAs within the UK Innovation Corridor can be therefore be considered to form part of Enfield's FEMA, as far as reasonably practicable.

Travel patterns

2.2.7. The flow of labour between LAs is represented in Travel to Work (TTW) statistics published in the 2011 Census[6]. This data is nine years old yet remains the most recent source which presents both where people work and where they come from to access work.

2.2.8. The data shows that only 33% of residents in Enfield work inside the Borough. There are three common out-commuting destinations for Enfield residents which are: to

[4] The London-Stansted-Cambridge Corridor Growth Commission (2016); The London-Stansted-Cambridge Corridor: Economic Characteristics and Performance.
[5] Hertfordshire County Council, (2018); Hertfordshire Infrastructure and Funding Prospectus (HIFP) 2018-31
[6] ONS (2016), Travel to work area analysis in Great Britain: Census 2011.

Inner London and the Central Activities Zone, to neighbouring Outer London boroughs, and to Local Authorities north of London in the UK Innovation Corridor. Approximately 55% of residents work within these boroughs. This comprises of 31% of residents which travel to boroughs in Inner London and the CAZ (with the highest proportion of people travelling to Westminster and the City of London). A further 17% travel to neighbouring Outer London boroughs (Haringey, Barnet, Waltham Forest and Redbridge), and 6% travel to Local Authorities north of London in the UK Innovation Corridor (primarily Broxbourne, Hertsmere and Epping Forest).

2.2.9. Of those which work in Enfield, 47% of them also reside in the Borough. A further 33% of Enfield's employees travel from neighbouring Outer London boroughs (Barnet, Haringey, Waltham Forest, Redbridge and Brent) and from LAs to the north of London in the UK Innovation Corridor (with a particularly high number of employees coming from Broxbourne and Epping Forest). The other 20% of Enfield's employees come from other LAs in London and across the wider South East.

2.2.10. Inner London and the CAZ attracts a highly skilled labour force from a large catchment area. It is a primary destination for workers across London and the wider South East. The type and size of businesses which the area attracts, and the employment opportunity which it offers, is different to that in Enfield. Residents in Enfield are likely to travel to the CAZ for work in, amongst other industries, Professional, Financial and Insurance, Information Technology and Business Administration. There are only a very small (4%) number of workers which, as of 2011, resided in Inner London boroughs and travelled to Enfield for work. Therefore, though there are many people residing in Enfield and working in Inner London boroughs, these boroughs should not be included within Enfield's FEMA solely based on this finding.

2.2.11. The data shows that the largest flow of labour is between Enfield and neighbouring boroughs in Outer London and LAs north of London, notably Broxbourne, Haringey, Barnet and Waltham Forest. Approximately 23% of Enfield's residents travel to these areas to access work, and approximately 33% of Enfield's workforce comprises of residents of these LAs. This is in part due to the presence of the UK Innovation Corridor, which encourages the flow of labour in the advanced technology and bioscience industries between LAs (see section 2.2.3). Residents in these areas are also likely to travel between these LAs to access employment in a variety of other sectors including Wholesale & Retail Trade, Transport and Storage, Manufacturing, Education and Human Health and Social work.

2.2.12. Additionally, informal consultation with districts in Hertfordshire suggests that many businesses based in Enfield, particularly those which are light industrial/manufacturing in nature, are owned by people residing in Hertfordshire. There is some evidence that, as industrial land becomes more expensive in Enfield, some owners are considering relocating to Hertfordshire due to cheaper land, reduced travel times and the opportunity to reorganise and consolidate on one single site.

Transport network

2.2.13. Enfield has excellent strategic road networks and good access to other LAs across London and the wider south-east of England via public transport.

2.2.14. The North Circular (A406) inner ring-road passes through the densely populated south of the Borough and links it with other Outer London areas including Brent, Barnet, Waltham Forest and Redbridge. The A10 dual carriageway travels north to south and extends north beyond the Borough across Haringey, Broxbourne and East Hertfordshire. The M25 travels east to west to the north of the Boundary and its boundary with Broxbourne. The M25 provides direct connections with Epping Forest, Welwyn Hatfield and Hertsmere, and via linking with the M11 it also provides motorway connections with Harlow and Uttlesford. This removes the need to use the many local roads travelling between Enfield and these other areas. Businesses and residents in Enfield can access the M25 via the A10 and Junction 25. Industrial areas along the Lea Valley in the north-east corridor of the Borough are well connected to both the A10 and the M25 via the A1055 Mollison Avenue/Bullsmoor Lane.

2.2.15. The East Coast Mainline, West Anglia Mainline and Hertford Loop Line all travel through the Borough, providing it with direct rail access to Liverpool Street, Stratford, Kings Cross, Moorgate, Cambridge and London Stansted Airport. Additionally, the Borough is the terminus for the Piccadilly Line of the London Underground network, ending in Cockfosters ward. In total, Enfield is home to five Piccadilly Line stations.

2.2.16. Enfield's excellent strategic road connections are important for the considerable number of people travelling between Enfield and other areas of Outer London/to the north of London to access employment. These strategic links also attract a high number of logistics, distribution and manufacturing businesses to Enfield and other boroughs which they travel through. In Enfield, these firms are distributed across the Borough, but particularly in the Borough's 'Eastern Corridor'. They rely on this road network to deliver goods in London and across the wider south-east, such as transporting goods between industrial areas in Enfield and those elsewhere as part of the network of supply chains which exists in the regional area. This is particularly the case between Enfield and Brent which can be accessed by the North Circular and between Enfield and Waltham Forest, Epping Forest, Haringey and districts in Hertfordshire which can be accessed by the A10 and the M25. These LAs all contain industrial areas close to the strategic road network. For example, as is noted in the Hertfordshire Infrastructure and Funding Prospectus[7], the majority of large distribution companies in the county are located in the major road corridors, including the A10 corridor which connects the east of the county to Enfield and to an extent along the M25 from the west.

2.2.17. Enfield's rail connections are used primarily by its residents to commute to work in Central London and Stratford, or to access London Stansted Airport. The airport is an important contributor to the UK Innovation Corridor and is a large employment base which attracts workers from across the south-east. The airport attracts potential workers from locations along the West Anglia Mainline by implementing incentives such as travel card subsidies.

Property Market Areas shared with other local authorities

2.2.18. Property Market Areas (PMAs) are identified based on shared characteristics, such as labour market structure, access to market areas and suppliers and rental values. Businesses searching for land and premises will typically consider locations within a property market area.

2.2.19. The London Industrial Land Demand Study (LILDS)[8] classifies the Borough as being part of the Lea Valley Property Market Area. Other areas in the Lea Valley PMA include areas in Newham, Haringey and Waltham Forest. The Lea Valley is a major industrial and warehousing location with excellent road transport links via the North Circular Road and the A10. The area is strategically important for these industries and therefore contains a significant amount of industrial land, much of which is designated as Strategic Industrial Locations (SIL) as well as Locally Significant Industrial Sites (LSIS).

2.2.20. The LILDS states that the area has recently seen a marked increase in industrial employment. It identifies that employment in logistics and manufacturing, the two largest industrial sectors in the area, increased by approximately 4,000 and 2,500

[7] Hertfordshire County Council, (2018); Hertfordshire Infrastructure and Funding Prospectus 2018-2031
[8] GLA, (2017); London Industrial Land Demand Study

respectively between 2009 and 2015. This was primarily due to development of industrial land in Enfield, particularly in the Ponders End area, with locations in Haringey and Newham experiencing declines.

2.2.21. Industrial areas in the boroughs which comprise the PMA are interlinked. The PMA is one of the largest areas of manufacturing and technology in London. Firms work together within the PMA to operate supply chains and support the output of these sectors. Several large distribution and logistics businesses have large centres in Enfield, including Amazon, Asda, DPD, John Lewis and Lidl. These businesses work with many suppliers, including smaller wholesaling firms, located in the PMA. The relationship between the boroughs comprising the Lea Valley is vital to strengthen and unlock further development of industrial land within the PMA.

Similarities to other local authorities

2.2.22. In 2015 the Office of National Statistics (ONS), based upon the most recent Census in 2011 provided a measure to review the similarities of different local authorities in England[9]. Measuring similarity between LAs was based on 157 socio-economic and demographic statistics from the 2011 Census in five different domains: demographic structure, household composition, housing, socio-economic character and employment. The assessment indicated that Enfield is most similar to the following local authorities: Croydon (classified as ‘very similar’); Barnet; Waltham Forest; Redbridge; and Barking and Dagenham (all classified as ‘similar’).

2.2.23. The LAs identified as ‘very similar’ or ‘similar’ to Enfield are all Outer London boroughs which are suburban in nature and have excellent links to the strategic road network. They all have high rates of car use, and residents use these strategic roads to access employment in neighbouring Outer London boroughs and in areas outside of London. They also all have adequate (but rarely excellent) public transport links to London, and a lot of residents in these boroughs choose to travel to the CAZ to access employment via these public transport links.

2.2.24. Enfield and Croydon are both important strategic locations for distribution, logistics and manufacturing. They both comprise a considerable amount of industrial land which supports a large employment base. These are likely primary factors as to why the boroughs are identified as ‘very similar’ to each other. Barnet, Waltham Forest and Redbridge are all in the UK Innovation Corridor, and all have a relatively high number of employees in the advanced technology and bioscience industries.

2.2.25. Though not identified in Enfield’s top five most similar LAs by ONS, Brent and Epping Forest are both also characterised by large supplies of industrial land, a relatively high proportion of employees in the distribution and manufacturing industries, and excellent links to the strategic road network. They also have high rates of private car use amongst their residents.

2.2.26. Another indication of similarities between Enfield and other LAs is the characterisation study which Enfield Council conducted in 2011[10]. The study identified the different areas within the Borough based on physical characteristics, history and social identity. The study recognised that the majority of industrial land in the Borough is located in the ‘Eastern Corridor’ i.e. to the east of the A10 and along the Lea Valley (including the major industrial areas of Brimsdown Industrial Park and Freezy Water). The study noted that this area has very similar characteristics to other boroughs in the Lea Valley Property Market, including Waltham Forest and Haringey.

[9] ONS, (2015); Area Classifications for Output Areas: Census 2011.
[10] Urban Practitioners on behalf of LB Enfield, (2011); Enfield Characterisation Study: Final Report.

2.4. Enfield's FEMA

2.4.1. Based on the above analysis, this report defines Enfield's FEMA as comprising the following LAs:

- Barnet;
- Brent;
- Broxbourne;
- East Hertfordshire;
- Epping Forest;
- Haringey;
- Harlow;
- Hertsmere;
- Newham;
- Redbridge;
- Uttlesford;
- Waltham Forest; and
- Welwyn Hatfield.

2.4.2. The below provides an overview of why each of the LAs listed above are included in our definition of Enfield's FEMA, drawing upon the analysis provided in section 2.2.

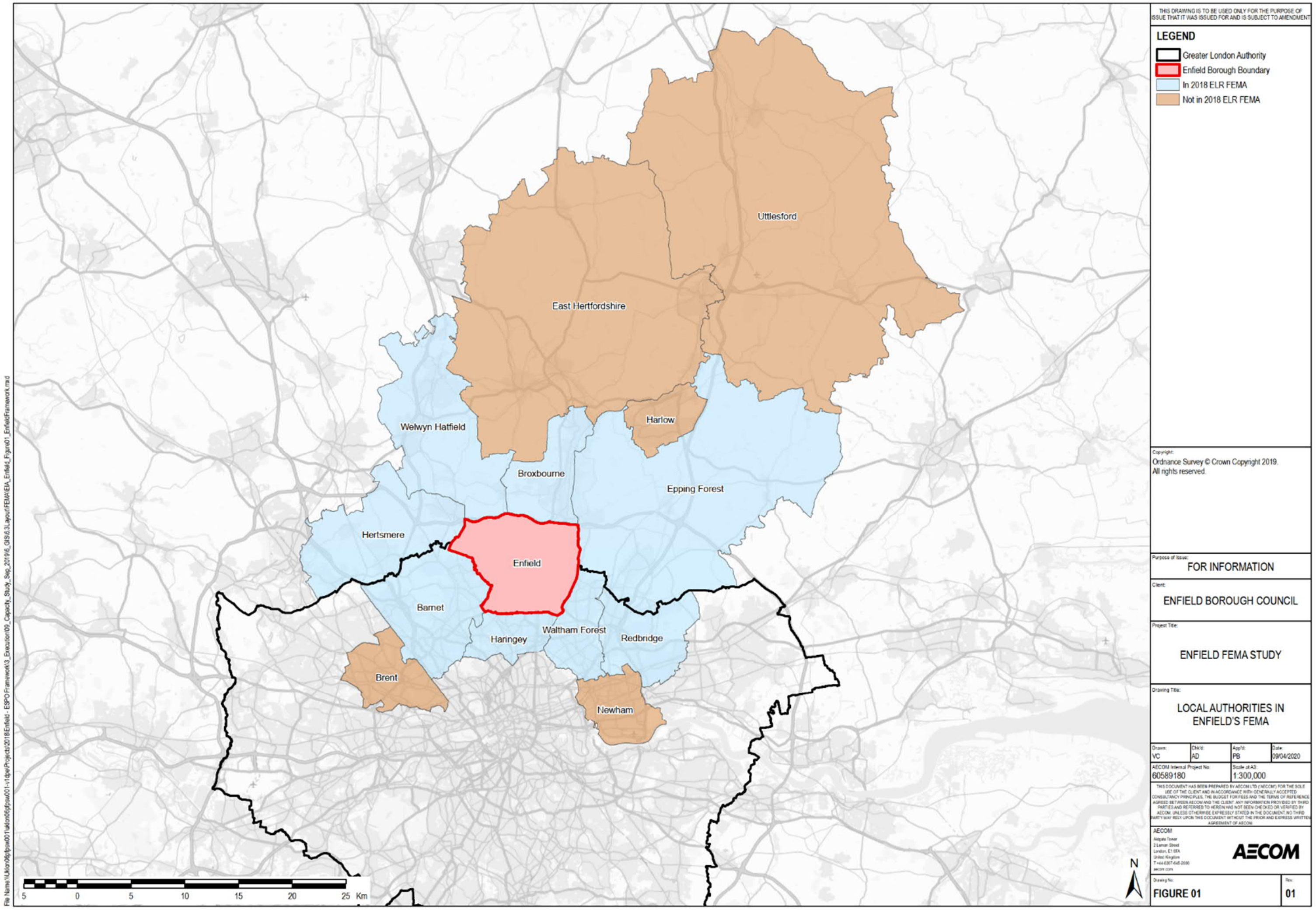
2.4.3. Areas within the London Boroughs of Newham, Haringey and Waltham Forest are part of the Lea Valley Property Market Area (as defined in the LILDS) along with areas of eastern Enfield. The Lea Valley PMA is a strategically important industrial and warehousing location. Firms work together within the PMA to operate supply chains and support the output of these sectors. There are a high number of people travelling between these boroughs for employment, and they are all Outer London boroughs with a suburban nature. They have therefore all been included in Enfield's FEMA.

2.4.4. The London Boroughs of Redbridge and Barnet, and LAs to the north of London (Broxbourne, East Hertfordshire, Harlow, Hertsmere, Uttlesford and Welwyn Hatfield) have also been included in Enfield's FEMA. There are excellent strategic road and public transport connections between these areas, and there are a high number of people which travel between the boroughs to access employment. Along with Haringey, Waltham Forest and Epping Forest, these Local Authorities are all also part of the UK Innovation Corridor, which is characterised by the presence of businesses in the advanced technology and bioscience industries. These businesses work together to create symbiotic economic links between the boroughs; spanning labour, supply chains and the transfer of knowledge and information.

2.4.5. Like Enfield, Brent and Epping Forest are both important industrial and warehousing locations. A relatively high proportion of the employee bases within all three boroughs are in the distribution and manufacturing industries. They are well connected via the strategic road network which appears to be facilitating a steady flow of goods between their respective industrial areas. These excellent strategic road links between the boroughs contributes to a high number of people travelling between them to access work as identified in the travel-to-work analysis.

2.4.6. Figure 1 shows the LAs included in Enfield's FEMA. Distinction has been made between those identified to be in the FEMA in the 2018 ELR and those new proposed additions.

Figure 1: Local authorities in Enfield's FEMA



Source: Aecom 2020

3. Potential for substitution in the FEMA

3.1. Approach

3.1.1. As described in Section 2.3, Enfield's FEMA comprises the following local authorities: Barnet, Brent, Broxbourne, East Hertfordshire, Epping Forest, Haringey, Harlow, Hertsmere, Newham, Redbridge, Uttlesford, Waltham Forest and Welwyn Hatfield.

3.1.2. For each of these areas, a desk-based assessment of supply and demand for industrial land was undertaken to identify the potential for substitution of industrial land with Enfield as per Policy E7 of the dNLP (see section 1.1.3). Overarchingly, the potential for substitution of industrial land with Enfield is considered possible where a local authority has a supply of industrial land which exceeds its forecast need.

3.1.3. The assessment used both local and regional evidence-based documents to inform a view on demand and supply for industrial land. Local studies include, but are not limited to, Employment Land Reviews. Regional studies include the London Industrial Land Supply and Economy Study (2015)[11] and the London Industrial Land Demand Study (2017). For some LAs, local and regional evidence-based studies present contrasting findings. Where this is the case, the study seeks to provide an accurate forecast of supply and demand using professional judgement given that a thorough understanding of the basis for these differences is beyond the scope of this study.

3.1.4. The assessment also considered, for those areas with potential for substitution, policy documents principally Local Plans to understand local authorities' positions on accommodating additional employment land beyond their own needs. Other factors impacting an LAs ability to provide additional industrial land were also considered including the demand and supply of office floorspace. In addition, the assessment takes account of wider potential impacts such as increased congestion, pollution and vehicular mileage that could arise from substitution of industrial land within the FEMA.

3.1.5. The output of the analysis was a traffic-light or 'red amber green' (RAG) rating assessment showing the potential of each LA to assist in meeting Enfield's need for additional industrial employment land.

3.1.6. Table 1 shows the categories LAs were assigned to based on the analysis and the criteria underpinning them.

Table 1: RAG Rating Categories and Criteria

Category	Description
No Potential	The LA will struggle to meet its own industrial land needs, or the LA faces pressures to accommodate other uses within the limited land supply it has.
Limited Potential	The LA has a limited surplus of land once it has provided for its own need, and planning policy is supportive of providing small quantities of additional industrial land beyond what is required to facilitate meeting their own needs.
Potential	The LA has a large surplus of land once it has provided for its own needs, and planning policy is supportive of providing additional industrial land, including in enabling other LAs to their needs.

[11] GLA (2015); London Industrial Land Supply and Economy Study

3.2. Analysis

3.2.1. Table 2 overleaf shows the results of the RAG rating assessment. For each LA, the findings are presented by the documents which provide the evidence of supply and demand. For example, in Barnet there are two studies which assess supply and demand for employment land: the Barnet Employment Land Review (2017), and the West London Employment Land Evidence (2019). The table presents the findings of both documents in separate rows, and then provides an assessment of potential for substitution based on the findings of both documents.

3.2.2. For each study, the table presents the following: the total stock of industrial land, the total stock of vacant land, demand, and the net requirement for industrial land. The total stock of industrial land is the stock of land used for industrial and warehousing purposes and comprises B1c, B2 and B8 uses. Wider industrial uses, including land for transport, waste and utilities are not included in the figure though it is recognised that were land within these uses to become surplus to requirements that they could potentially be returned to use as employment land; the evidence reviewed has not identified such instances. Vacant industrial land is identified as land which is not currently in use and readily able to accommodate industrial land demand.

3.2.3. The demand figures identified in the table represent net demand over the study period. In line with figures for supply, the figures represent change in demand for B1c, B2 and B8 uses. The net requirement for land is identified as the difference between forecast demand and forecast supply. Some studies present an analysis of the forecast change in supply over the study period and the presence of vacant land (which is readily available to accommodate incoming businesses). Other studies present the change in demand as the net requirement for land.

3.2.4. The figures for total supply provided in the London Industrial Land Supply and Economy Study (LILSE) represents the sum of land designated for core industrial uses and vacant land. The total stock of vacant land represents both vacant industrial land (including cleared sites and land with derelict industrial buildings) and land with vacant buildings.

3.2.5. The net requirement figure taken from the London Industrial Land Demand Study (LILDS) represents all core industrial and warehousing uses. It consists of the change in demand for these uses between 2017 and 2041 and the presence of vacant land at the time of the study. These figures consider the potential use of some surplus vacant land (in line with the optimal frictional vacancy rate) in their identification of net requirement.

3.2.6. The final column presents an analysis of the potential for substitution, considering the evidence provided in the relevant studies. The analysis in some instances has considered evidence from other studies beyond the core documents named earlier in the table, which contain useful information on supply or demand for industrial employment land. The analysis also draws upon Local Plans, to understand if any of the LAs are likely to be receptive to assisting in meeting Enfield’s need for additional industrial employment land.

Table 2: RAG rating assessment identifying opportunity for substitution of industrial land with each Local Authority in Enfield's FEMA.

Local Authority	Local Evidence Base						London Evidence Base (where applicable)			Potential for substitution (No Potential / Limited Potential / Potential)
	Study	Study period	Total stock of industrial land	Total stock of vacant industrial land	Net demand over study period	Net requirement for industrial land	Total stock of industrial land identified in LILSE	Total stock of vacant industrial land identified in LILSE	Net requirement for industrial land identified in LILDS (2017-2041)	
Enfield	Enfield Employment Land Review (2018)	2016-2036	329.1ha	15.5ha	46.1ha, based on employment projections.	48.6ha	340.3ha	24.3ha	52.0ha	n/a
Barnet	Barnet Employment Land Review (2017)	2016-2036	42ha	5ha	7.3ha, based on employment projections.	7.3ha	73.5ha	6.2ha	5.1ha	**No Potential** Barnet has a small (42ha) stock of industrial land, much of which is identified in the evidence as being underutilised and in poor quality. To meet its positive net requirement for industrial land, the Borough will seek to intensify/redevelop existing poor-quality stock. Since the Borough only has a small supply of industrial land, it will seek to rely on industrial land elsewhere to accommodate demand, including in Brent and the OPDC/Park Royal area. Therefore, there is assessed to be no potential for Barnet to accommodate additional industrial land demand from Enfield.
	West London Employment Land Evidence (2019)	2016-2041	34.3ha	2ha	13.5ha, based on employment projections.	13.5ha				
Brent	Brent Employment Land Demand Study (2015)	2015-2029	316.1ha	8.1ha	Between -30.7ha and 25.4ha, based on three scenarios which use either employment projections or past trends.	Between -14.4ha and -8.8ha.	328.1ha	8.1ha	46.9ha	**No Potential** Brent has a large stock of industrial land (316ha), much of which is good quality and the rate of vacancy is low. Brent's 2015 Employment Land Demand Study predicted that demand for industrial land demand to 2029 is negligible. However, the LILDS predicts that Brent has a net requirement to provide an additional 46.9ha of industrial land to 2041. Due to its industrial nature, Brent also experiences pressures to accommodate demand for neighbouring boroughs including Barnet. The net requirement predicted by the LILDS is high and it is reasonable to assume that the Borough will be required to facilitate for this level of existing demand. Therefore, there is assessed to be no potential for Brent to accommodate additional industrial land demand from Enfield.
	West London Employment Land Evidence (2019)	2016-2041	Information not included in study, though it identifies 69ha of industrial land in the Borough outside of the Old Oak and Park Royal Development Corporation (OPDC) area.	1.3ha	0.6ha, based on employment projections not including demand for land at OPDC and Park Royal.	0.6ha				

Local Authority	Local Evidence Base						London Evidence Base (where applicable)			Potential for substitution (No Potential / Limited Potential / Potential)
	Study	**Study period**	**Total stock of industrial land**	**Total stock of vacant industrial land**	**Net demand over study period**	**Net requirement for industrial land**	**Total stock of industrial land identified in LILSE**	**Total stock of vacant industrial land identified in LILSE**	**Net requirement for industrial land identified in LILDS (2017-2041)**	
Broxbourne	Broxbourne Employment Land Study (2016)	2016 - 2031	63.7ha	5.9ha	44.9ha, based on employment projections.	34.1ha	n/a	n/a	n/a	**No Potential** Broxbourne's industrial land is generally of a good quality, but there is limited supply available (63.7ha). Broxbourne's Employment Land Study forecasts the LA will be required to provide 34ha of additional industrial land to meet demand to 2031. The LA will be required to find new industrial land as well as make use of vacant land and intensifying/redeveloping older stock to accommodate this. In their Local Plan (2018-2033), the LA state their intention to provide growth in the creative and life sciences sectors instead of catering only for manufacturing and warehousing uses which is what many of its employment sites currently consists of. Therefore, there is assessed to be no potential for Broxbourne to accommodate additional industrial land demand from Enfield.
East Hertfordshire	West Essex and East Herts Assessment of Employment Needs (2017)	2016 - 2033	Information not included in study.	Information not included in study.	13ha, based on employment projections.	13ha	n/a	n/a	n/a	**No Potential** East Hertfordshire has a relatively limited supply[12] of industrial land which is generally of good quality with low vacancy rates. The supply of industrial floorspace in the district has reduced by 14% since 2008[13]. The West Essex and East Herts Assessment of Employment Needs predicts that demand for industrial land will increase by 13ha to 2033. In response, the LA's Local Plan (2018) allocated 15ha of land for industrial uses to 2033. The LA is therefore capable of meeting its industrial land requirements. However, the LA does not have high levels of industrial land supply and it is not able to cater for additional land demand from Enfield.

[12] The East Herts Council Authority Monitoring Report 2018-2019 states that, in 2019, the district's total stock of industrial land was 82.4ha.
[13] Lambert Smith Hampton (2019): Loss of Employment Space in Hertfordshire: Study into extent, implications and solutions.

Local Authority	Local Evidence Base						London Evidence Base (where applicable)			Potential for substitution (No Potential / Limited Potential / Potential)
	Study	Study period	Total stock of industrial land	Total stock of vacant industrial land	Net demand over study period	Net requirement for industrial land	Total stock of industrial land identified in LILSE	Total stock of vacant industrial land identified in LILSE	Net requirement for industrial land identified in LILDS (2017-2041)	
Epping Forest	Epping Forest Employment Land Supply Assessment (2017), in conjunction with the Epping Forest Employment Review (2017).	2016 - 2033	125.7ha	Information not included in study.	14ha, based on employment projections.	14ha	n/a	n/a	n/a	**No Potential** Epping Forest has a large quantity of industrial land which is generally of good quality with only negligible levels of vacancy. The LA's ELR states that additional industrial land demand to 2033 can be accommodated within the LA by redeveloping and intensifying existing sites. However, opportunities for providing additional land demand are limited given the LA's high office demand which is well in excess of forecast supply. The LA is also forecast to experience a large increase in population over the planning period (2011-2033) and land will be required to provide housing to meet targets. Therefore, there is assessed to be no potential for Epping Forest to accommodate additional industrial land demand from Enfield.
	West Essex and East Herts Assessment of Employment Needs (2017)	2016 - 2033	Information not included in study.	Information not included in study.	14ha, based on employment projections.	14ha				
Haringey	Haringey Employment Land Study (2015)	2015 - 2031	Information not included in study.	Information not included in study.	Between 0.1ha and 9.6ha, based on three scenarios which use either employment projections or past trends.	Between -10.6ha and 5.1ha.	130.6ha	11.3ha	-28.7ha	**No Potential** Haringey has a relatively large quantity of industrial land which is generally of good quality with low vacancy rates. Demand for industrial land in the Borough is expected to be stable (as per the Borough's 2015 Employment Land Study between 2015 and 2031) or reduce (as per the LILDS between 2017 and 2041). However, the supply of warehousing and manufacturing industrial land in the Borough is expected to reduce. The Borough has a high forecast demand for office floorspace which is in excess of supply. It also seeks to expand its supply of floorspace for businesses in the creative industries and in the research and development sector. Therefore, there is assessed to be no potential for Haringey to accommodate additional industrial land demand from Enfield.

Local Authority	Local Evidence Base						London Evidence Base (where applicable)			Potential for substitution (No Potential / Limited Potential / Potential)
	Study	**Study period**	**Total stock of industrial land**	**Total stock of vacant industrial land**	**Net demand over study period**	**Net requirement for industrial land**	**Total stock of industrial land identified in LILSE**	**Total stock of vacant industrial land identified in LILSE**	**Net requirement for industrial land identified in LILDS (2017-2041)**	
Harlow	Harlow Employment Land Review (2013)	2011-2031	Information not included in study.	Information not included in study.	-5.6ha, based on employment projections.	-5.6ha	n/a	n/a	n/a	**No Potential** Harlow is a small, rural LA which, given its size, only has a small supply of industrial land. This is concentrated in Enterprise Zones (EZs) between the town and the M11 and is generally in good condition. The West Essex and East Herts Assessment of Employment Study undertaken in 2017 predicted that demand for industrial land is likely to increase by 16ha to 2033. The draft Harlow Local Plan (set to be adopted in 2020) states that the LA can accommodate this additional demand by intensifying and redeveloping land within its EZs. However, there is limited land available beyond this to accommodate further demand. Therefore, there is assessed to be no potential for Harlow to accommodate additional industrial land demand from Enfield.
	West Essex and East Herts Assessment of Employment Needs (2017)	2016-2033	Information not included in study.	Information not included in study.	16ha, based on employment projections.	16ha				
Hertsmere	South West Herts Economic Study (2019)	2018-2036	Information not included in study.	1.6ha	8.2ha, based on past trends.	2.4ha	n/a	n/a	n/a	**No Potential** Hertsmere is a rural Borough which has a considerable quantity of land located within areas designated as green belt. It therefore has a has a limited supply of industrial land (which has reduced by 11% since 2008[14]) which is generally in good condition with low vacancy levels. The South-West Herts Economic Study projects that the LA will be required to provide 2.4ha of additional land above the 6 hectares the LA has already allocated in their Local Plan (2012) to cater for industrial land demand to 2036. The Local Plan states that this demand can only be met if re-designation of Green Belt land is permitted. Therefore, there is assessed to be no potential for Hertsmere to accommodate additional industrial land demand from Enfield.

[14] Lambert Smith Hampton (2019): Loss of Employment Space in Hertfordshire: Study into extent, implications and solutions.

Local Authority	Local Evidence Base						London Evidence Base (where applicable)			Potential for substitution (No Potential / Limited Potential / Potential)
	Study	**Study period**	**Total stock of industrial land**	**Total stock of vacant industrial land**	**Net demand over study period**	**Net requirement for industrial land**	**Total stock of industrial land identified in LILSE**	**Total stock of vacant industrial land identified in LILSE**	**Net requirement for industrial land identified in LILDS (2017-2041)**	
Newham[15]	Newham Employment sites audit (update November 2017), in conjunction with the Newham Employment Land Review: Demand Assessment (November 2017).	2015 - 2032	Information not included in study.	42.5ha	26ha, based on employment projections.	-16.5ha	306.7ha	104.5ha	-112.5ha	**Limited Potential** The LLDC area, which will be well connected to Enfield due to the construction of a new public transport link between the two areas, is expected to see a reduction in demand for industrial land to 2031 and a likely net surplus of industrial land between 0.4ha and 6.2ha. However, in the area, office development and housing are prioritised and the LLDC is not in a position to accommodate Enfield's industrial land demand. In the wider Newham area, there is considered to be more potential. The LILDS states that, due to the large quantity of vacant land in the Borough, as well as declining demand for industrial land, there is a surplus of industrial land of 112.5ha to 2041. However, the more recent Council's Newham Employment Land Review (ELR) predicted that net demand to 2032 was 26ha and vacant land was 42.5ha, resulting in a surplus of industrial land of 16.5ha. Since the ELR, comprehensive redevelopment of vacant land at Thameside West has been proposed, and plans for expansion of waste management uses and transport (DLR depot in Beckton Riverside have developed further Taking this into account the recorded 16.5ha surplus has likely reduced with surplus land located only within Beckton Riverside, the part of the Borough which is most distant from Enfield. Any opportunity for substitution with Newham is thus considered to be limited and likely to diminish further such that it is unlikely to provide meaningful potential in the medium-term. Overall, there is assessed to be limited potential for Newham to accommodate Enfield's forecast additional industrial land requirements.
	LLDC Area Employment Land Review (2014)[16]	2014 - 2031	Total stock of industrial land in the LLDC is 49ha.	1.9ha	Between -7.5ha and -2.2ha, based on three scenarios which use employment projections.	Between 6.2ha and -0.4ha.				

[15] For Newham, this study has assessed the demand and supply for industrial land for the entirety of the Borough, including the area operated by the London Legacy Development Corporation (LLDC). The LLDC assumes responsibility for all planning decisions in the recently redeveloped Queen Elizabeth Olympic Park. The LLDC area is primarily in Newham but is also in Waltham Forest, Hackney and Tower Hamlets.

[16] The statistics included in this study are for the area operated by the LLDC. This is primarily located in Newham but there are parts of the LLDC in Waltham Forest, Hackney and Tower Hamlets.

Local Authority	Local Evidence Base						London Evidence Base (where applicable)			Potential for substitution (No Potential / Limited Potential / Potential)
	Study	**Study period**	**Total stock of industrial land**	**Total stock of vacant industrial land**	**Net demand over study period**	**Net requirement for industrial land**	**Total stock of industrial land identified in LILSE**	**Total stock of vacant industrial land identified in LILSE**	**Net requirement for industrial land identified in LILDS (2017-2041)**	
Redbridge	Redbridge Employment Land Review (2016)	2016 - 2036	Information not included in study.	Information not included in study.	Between -14.5ha and 23.4ha, based on three scenarios which use either employment projections or past trends.	Between -14.5ha and 23.4ha.	53.7ha	3.7ha	-0.7ha	**No Potential** Redbridge has a limited supply of industrial land which is generally of good quality. The LILDS and the Redbridge Employment Land Review both indicate that demand for industrial land in the Borough is projected to be stable over their respective forecasting periods. The Borough is catering for industrial land by protecting its SIL and LSIS. The Borough is experiencing high demand for office space and housing. It is therefore releasing non-designated industrial land to provide for other uses. Therefore, there is assessed to be no potential for Redbridge to accommodate additional industrial land demand from Enfield.
Uttlesford	Uttlesford Employment Land Review (2017)	2016-2033	80.5ha	0.7ha	Between -3.6ha and 3.8ha, based on three scenarios which use employment projections.	Between 2.5ha and 10.5ha.	n/a	n/a	n/a	**Potential** Uttlesford has approximately 80ha of land in industrial use which is generally of good quality with very low vacancy. The LA's 2017 ELR forecasts that it will need to provide between 2.5ha and 10ha of industrial land to meet its demand to 2033. The West Essex and East Herts Assessment of Employment Needs, also covering up to 2033, predicts an industrial land demand increase which is higher (approximately 22ha). In this study, the LA's forecasted demand for office space is forecast to be up to 2.1ha. The Draft Local Plan allocates a site for approximately 55ha of non-airport related B1, B2 and B8 employment use. This land is located in the North Stansted Employment Area and is currently part of the London Stansted Airport Strategic Allocation. Airport related uses will be limited to the remainder of the Strategic Allocation, including land to the south of the runway. On this basis, if the 55ha were to be re-allocated for non-airport related use, this land would be suitable for accommodating industrial activities including logistics, distribution, light industrial and manufacturing as well as non-industrial office employment uses based on the land uses permitted. Therefore, there is assessed to be potential for Uttlesford to accommodate additional industrial land demand from Enfield.
	West Essex and East Herts Assessment of Employment Needs (2017)	2016-2033	Information not included in study.	Information not included in study.	22ha, based on employment projections.	22ha				

Local Authority	**Local Evidence Base**						**London Evidence Base (where applicable)**			**Potential for substitution (No Potential / Limited Potential / Potential)**
	Study	**Study period**	**Total stock of industrial land**	**Total stock of vacant industrial land**	**Net demand over study period**	**Net requirement for industrial land**	**Total stock of industrial land identified in LILSE**	**Total stock of vacant industrial land identified in LILSE**	**Net requirement for industrial land identified in LILDS (2017-2041)**	
Waltham Forest	Employment Land Review (2016)	2015-2031	Information not included in study, though total stock of employment land identified to be 140.3ha.	1.64ha	Between 5.6ha and 12.7ha, based on three scenarios which use employment projections.	Between 5.6ha and 12.7ha.	120.4ha	2.3ha	6.2ha	**No Potential** Waltham Forest's industrial land is primarily located in the Lea Valley area. It is generally of good quality with low levels of vacancy. The Waltham Forest ELR states that demand for industrial land in the Borough is expected to increase between 5.6ha and 12.7ha to 2031. The LILDS forecasts an increase of 6.2ha to 2041. The Local Plan states that Waltham Forest will be able to meet this demand by redeveloping and intensifying space within its existing employment land sites. However, the Borough has a high demand for office floorspace which is in excess of supply. Its population is also increasing at a high rate and the Borough is therefore experiencing an increase in demand for housing resulting in land being limited. Therefore, there is assessed to be no potential for Waltham Forest to accommodate additional industrial land demand from Enfield.
Welwyn Hatfield	Examination of the Welwyn Hatfield Local Plan: Council's Statement for the Stage 6 Hearing on 17th December 2019 - Employment Land Need (2019)	2016 - 2036	Information not included in study.	Information not included in study.	6.5ha	Between 6.3ha and 0.9ha.	n/a	n/a	n/a	**No Potential** The Welwyn Hatfield ELR predicts that demand for industrial land in the LA will increase by between 6.5ha by 2036. The study states that the LA cannot meet this demand, and is projected to have a shortfall of between 6.3ha and 0.9ha by 2036, depending on if planning applications which require the conversion of space in the green belt are allowed to come forward. The LA is therefore in no position to cater for the industrial land demand of other LAs.

3.2.7. The RAG assessment concludes that Uttlesford is the only LA identified as having ‘potential’ for substitution with Enfield. Uttlesford’s employment land studies forecast that there is demand for up to 22ha of industrial land and 2ha of office floorspace to 2033. The Draft Local Plan allocates a site for approximately 55ha of non-airport related B1, B2 and B8 employment use. This land is located in the North Stansted Employment Area and is currently part of the London Stansted Airport Strategic Allocation. Airport related uses will be limited to the remainder of the Strategic Allocation, including land to the south of the runway. Therefore, if 55ha of land were to be made available for development for general industrial and office purposes, there would be up to 31ha of additional land available in Uttlesford. This available land could accommodate some of Enfield’s industrial demand. This land would be suitable for accommodating industrial activities including logistics, distribution, light industrial and manufacturing as well as non-industrial office employment uses based on the land uses permitted.

3.2.8. However, Uttlesford and the potential area of surplus land within it are located at considerable distance from Enfield, and the benefits of substitution could be undermined by the potential increased congestion, pollution and vehicular mileage. Demand for industrial and warehousing land in Enfield is strong, predicated on its good connections with the strategic road network and other major employment hubs in Outer London. Enfield is also well placed to provide for London’s large and growing population. Uttlesford’s employment land, though well-connected via the M11, does not offer many of these benefits. It may therefore be difficult in practice to straightforwardly substitute demand between Enfield and Uttlesford were this to be agreeable to the relevant parties.

3.2.9. Newham has been assessed as having ‘limited potential’ to assist in accommodating Enfield’s net additional requirement for industrial land. The quantity of land which the Borough has after catering for its own demand is disputed. The LILDS projects that demand in the Borough for industrial land will reduce by approximately 18ha to 2041, and states that in 2017 there was 95ha of vacant land. It therefore states that the Borough has a net surplus of 112ha of land. However, the Newham Employment Land Review, published later in the same year as the LILDS, states that demand will increase by 26ha to 2032 and identified 42.5ha of vacant land, resulting in a net surplus of 16.5ha. Regardless of which forecast is most accurate, Newham is projected to have a surplus of industrial land and there is therefore, on this basis alone, some potential that it could, in part, assist in accommodating Enfield’s net additional requirement for industrial land. However taking into account development proposed since the ELR, this surplus has likely reduced and is located only within Beckton Riverside, the part of the Borough which is most distant from Enfield. Any opportunity is thus considered to be limited at present and likely to diminish further rather than increase such that it is unlikely to be a meaningful and viable potential location in the medium-term.

3.2.10. All other LAs are assessed to have ‘no potential’ to assist in accommodating the additional requirement for industrial land which exists in Enfield. This is based on the following:

- Barnet, Broxbourne and Brent do not have enough forecast supply to meet their own demand;
- Epping Forest, Haringey, Waltham Forest and Redbridge are all projected to have enough supply to meet demand, but many of these LAs have growing populations and in their Local Plans they place emphasis on prioritising other uses including housing and office floorspace;
- Hertsmere and Welwyn Hatfield can meet their own demand, but only if all planning applications in their pipeline come forward including those which involve loss of Green Belt land;

- Harlow and East Hertfordshire are projected to have enough supply to meet demand, however, these LAs have small stocks of industrial land with very few land parcels which could sufficiently cater for Enfield's industrial land demand.

4. Conclusions

4.1.1. This report has firstly provided a review of LB Enfield's FEMA which was initially identified in the Borough's 2018 Employment Land Review. The review was based on indicators of economic linkages provided by the PPG to identify FEMAs with emphasis placed on links with Enfield's large industrial and warehousing economy. The analysis included, amongst other factors, identifying partnerships with other LAs and the presence of any shared property market areas, travel to work patterns, and any similarities in terms of characteristics between Enfield and other LAs.

4.1.2. The analysis concluded that Enfield's FEMA comprises the following: Barnet. Brent, Broxbourne, East Herts, Epping Forest, Haringey, Harlow, Hertsmere, Newham, Redbridge, Uttlesford, Waltham Forest and Welwyn Hatfield. Five of these LAs were not included in the 2018 Enfield ELR FEMA (East Hertfordshire, Harlow, Brent, Newham and Harlow).

4.1.3. Secondly, an assessment ascertaining the potential for other authorities to assist in meeting Enfield's need for additional industrial employment land was undertaken. This has concluded that Uttlesford is the only LA in the FEMA which has 'potential' to accommodate Enfield's industrial land demand. This is because the LA plans on making available for development around 55ha of land for general industrial and office use which is currently designated for use by activities associated with Stansted Airport. This would cater for Uttlesford's industrial and office demand, with additional surplus land left over. However, the assessment notes the difficulties of substituting demand between Enfield and Uttlesford, due to the distance between the LAs and the relative benefits of operating industrial activity between them. The study also identifies that there is 'limited potential' for Newham to accommodate Enfield's industrial land due to the borough having some surplus supply of industrial land after catering for its own needs. All other LAs within Enfield's FEMA are assessed to have 'no potential' to assist in meeting Enfield's need for additional industrial land. Many of these LAs are not able to readily meet their own industrial land needs, and others are prioritising other uses such as housing and office floorspace.

4.1.4. This evidence-based report has been prepared to support preparation of the Enfield Local Plan (2036). This report will be subject to engagement with relevant parties as part of Duty to Cooperate and other stakeholder engagement.

AECOM Limited
Aldgate Tower
2 Leman Street
London E1 8FA
United Kingdom
aecom.com