

Enfield Local Plan

Employment Topic Paper

June 2021



<https://new.enfield.gov.uk/services/planning/evidence-base/>

Contents

Executive summary	3
1. Policy context.....	4
2. Economic need in Enfield	5
3. Economic supply in Enfield.....	11
4. Summary and conclusions.....	20
Appendix A: Land availability assessment process	22
Appendix B: Site Selection Methodology	24

Executive summary

Enfield's economic and employment evidence is extensive, this Topic Paper summarises key evidence that sets the direction of travel for our draft employment policies in the Enfield Local Plan (ELP). Employment policies, for the purpose of the ELP, are those which deal with industrial and logistics and office activities.

In Section 2 of this paper sets out the policy context, and section 3 sets out how the Council arrived at its estimate of economic 'need', taking into consideration national policy and guidance.

The assessment of need tells us how much additional land and floorspace the ELP should look to accommodate. It is important that the Council tries to meet these needs in full, both to provide jobs for existing and future residents but also to secure a supply of land/ floorspace for business to grow and prosper.

The Council recognises that Covid will require us to review our evidence of need. Early indications suggest that Enfield may need more floorspace to meet the demands of a post Covid boom in logistics – partly related to the rapid decline of the retail high street. Office evidence will also need to be updated to reflect trends in homeworking and social distancing.

Section 4 considers the various routes to meet this need, starting with maximising brownfield potential by making several new employment and mixed use site allocations. The section also explores the future potential for new industrial sites where large format retail sites can be used for new industrial uses. The shift in retail has presented a small number of new opportunities that the Council will look to harness to meet our economic needs where possible.

This section also considers the scope to intensify industrial activity within existing employment areas. This is perhaps the most challenging area of policy and evidence. Here a large amount of our designated industrial land is considered strategic in the London Plan and it makes sense to use this as efficiently as possible for industrial uses before considering releases.

The draft ELP seeks to protect the existing floorspace on sites but also encourage genuine intensification of industrial land. This is a considerable challenge because viability and deliverability of intensified industrial property limits the quantum of space that can 'count' against our assessed need. The policy framework seeks to encourage developers to assemble industrial sites to deliver more intensive formats on our limited stock of land.

The approach taken by the draft ELP is to maximise the potential of urban sites as a means of meeting identified needs. However, as the potential of urban sites is insufficient, the plan also proposes the selective development of a small number of Green Belt sites.

Section 5 provides a summary and conclusion.

1. Policy context

Meeting identified needs

- 1.1 A crucial issue for the ELP is the extent to which the supply of employment sites can meet identified needs.
- 1.2 This requirement is grounded in national policy. The National Planning Policy Framework (NPPF) indicates that 'plans should positively seek opportunities to meet the development needs of their area' and 'strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses.' (Para 11). It indicates that plans should 'be prepared positively, in a way that is aspirational but deliverable.' (Para 16).
- 1.3 Strategic policies need to 'make sufficient provision for housing, employment, retail, leisure and other commercial development.' (Para 20):
 - They should 'look ahead over a minimum 15-year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure.' (para 22); and
 - 'provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period' (para 23).
- 1.4 The NPPF also requires Local Plans to 'set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period.' (Para 81).

2. Economic need in Enfield

Introduction

- 2.1 In mid-2016 AECOM was commissioned to update the Borough's employment land evidence. This took the form of an Employment Land Review or ELR following the guidance set out in the Planning Practice Guidance (PPG).
- 2.2 The ELR assessed the quantity and quality of the Borough's employment land and reported in late 2018. The ELR was supplemented by a number of other documents including:
- Industry in Enfield (2017);
 - Enfield Socio-Economic Assessment (2017);
 - Enfield Functional Economic Market Study (2020);
 - Enfield Industrial Intensification Study Final Draft Report (2020); and
 - Enfield Industrial Intensification Market Deliverability Study (2021).
- 2.3 This section first outlines the Borough's 'economic' need – as calculated by the evidence. The report then moves to examine how to apply this evidence in light of the new London Plan and set out how the Council intends to approach refreshing the evidence to reflect Covid and more recent changes in policy.

Assessment of economic need

- 2.4 The assessment of 'need' is found mainly in the 2018 Employment Land Review.
- 2.5 The Planning Practice Guidance (PPG) provides three broad approaches to assessing economic needs:
- Labour supply
 - Projections based on past trends of development completions
 - An assessment based on labour demand (economic forecasts)
- 2.6 The ELR considered all three approaches but ultimately promoted the use of the economic forecast (labour demand).
- 2.7 The labour supply approach was dismissed because:
- “while providing a broad estimate of employment need across all sectors in the economy, the labour supply approach does not make any distinction between which sectors in the economy are expected to grow and hence does not account for structural economic changes. A simple review of population growth does not capture the potential for residents to travel elsewhere to work (whether in or out of the Borough) and how this is expected to change over time.” (Para 6.4.6).*
- 2.8 The consultants also dismissed a past trends approach because:
- “The suitability of this approach is contingent on the extent to which we may reasonably expect past trends to continue. This approach is also sensitive to the effects of short term fluctuations in data, which do not provide an accurate representation of long term growth trends. This therefore may not provide the*

most accurate indication of future expectations” ... “As a result, historic take-up rates alone are not considered a suitable method of estimating future floorspace demand.” (Para 6.4.7).

- 2.9 To arrive at a view of need based on ‘labour demand’ the ELR used two sets of economic forecasts. The first forecast was from the East of England Forecasting Model (EEFM). The model was originally designed to support regional planning in the East of England but also covered Enfield. Although termed the EEFM in practice the model was based on a 2015/16 Cambridge Economics Forecast. The consultants also used the most recent GLA Economics forecasts.
- 2.10 Table 6.4 of the report presents the findings / conclusions for Enfield and its Functional Economic Market Area (FEMA).

	Use Class	2016	2036	Difference	Change (%)	CAGR (%)
LB Enfield	Office (B1a/b)	17,300	22,200	4,900	28.2%	1.3%
	Industrial (B1c/B2/B8)	17,500	20,900	3,400	19.2%	0.9%
FEMA	Office (B1a/b)	131,900	180,700	48,800	37.0%	1.6%
	Industrial (B1c/B2/B8)	88,600	103,000	14,400	16.3%	0.8%

Source: EEFM, (2016); ONS, (2016); GLA Economics (2015); AECOM calculations.

Figure 1: AECOM Employment Projections

- 2.11 Although data from both the Borough and FEMA is presented, the consultants advised that Enfield should plan for the growth rates reported at the FEMA level, derived from the East of England Forecasting Model (EEFM). They recommended this because:

“The FEMA is considered a more suitable level of geography to forecast at” (paragraph 6.5.3)

- 2.12 Practically this choice would appear to increase office need in Enfield because the FEMA growth rates were higher than Enfield alone. Conversely the choice would appear to slightly reduce industrial (and warehousing) need because the FEMA growth rate was very slightly lower. The council intends to update the economic evidence base once the impacts of COVID and Brexit have become clearer.
- 2.13 Finally, before concluding on need, AECOM made a number of allowances for vacancy and underused land before concluding on need in chapter 7 of their report.
- 2.14 For industrial and warehousing uses the final recommendation was to plan for an increase of 48.6ha of land. For offices the recommendation was expressed as 32,000 sqm of floorspace.

Demand for Industrial Land	Industrial Land (Ha)
A. Total stock of core industrial land (2016) plus vacant land [B+C]	329.1
B. Current vacant industrial land equivalent (4.7%) ...of which is actively marketed vacant land	15.5 ...2.9
C. Supply of occupied core industrial land (2016) [A-B]	313.6
D. Land demand to 2036	46.1
E. Optimum frictional vacancy at 2036 [5% of C+D]	18.0
F. Additional Demand for Utilities, Transport and Waste Management 2016-2036	0
G. Surplus/deficit of vacant land in 2036 [E-B]	2.5
H. Gross requirement for industrial land 2016-2036 [A+D+F+G]	377.7
I. Net requirement for industrial land 2016-2036 [H-A]	48.6

Figure 2: Net Additional Industrial Projections

Demand for Office Floorspace	Office Floorspace (sqm)
A. Supply of occupied office floorspace (2016)	215,100
B. Current vacant office floorspace (1.1%)	2,400
C. Total stock of office floorspace (2016) [A+B]	217,500
D. Floorspace demand to 2036	22,700
E. Optimum frictional vacancy at 2036 [5% of A+D]	11,900
F. Surplus/deficit of vacant floorspace in 2036 [E-B]	9,500
G. Gross requirement for office floorspace 2016-2036 [C+D+F]	249,700
H. Net requirement for office floorspace 2016-2036 [G-C]	32,200

Source: AECOM.

Note:

Point A: Using CoStar stock data (November 2016) rather than VOA data (December 2016) as this is closer to that estimated by Cushman and Wakefield for the London Office Policy Review 2017 (GLA), which estimated office stock to be 223,000sqm (para 6.2.39).

Point B: % vacancy rate as estimated by CoStar Data (November 2016).

Point D: Derived from the FEMA CAGR % pa in Table 6-6. The PPG advises that where possible employment floorspace should be converted to employment land using plot ratios. However, due to the wide range of densities of offices it is less meaningful to translate the floorspace demand figures into land. The demand for office space is therefore presented in terms of floorspace (sqm).

Figure 3 Net Additional Office Projections.

Aligning with the London Plan

- 2.15 The approach to assessing need was developed by AECOM in line with the PPG. As a cross check AECOM checked their recommendation with the London Plan evidence suite.
- 2.16 The London Office Policy Review suggested less growth in Enfield than recommended by AECOM, but the consultant team chose to recommend a quantity of need based on their EEFM FEMA analysis.
- 2.17 For Industrial, as part of their 2020 intensification evidence, AECOM noted that their recommendation to provide 48.6ha of land up to 2036 broadly aligned with the 52ha of land reported in the GLA Industrial Land Demand Study (2017). The GLA evidence was for a slightly longer period (2039) but the difference was not significant.

Adjusting for the Enfield Plan Period

- 2.18 As noted above, AECOM concluded that Enfield requires 48.6ha of net additional industrial (and warehousing) land and 32,200 sqm of office floorspace. This is for the period up to 2036, which was the former proposed plan period. The plan period has since been revised to extend to 2039, in line with the NPPF (para 22).
- 2.19 To provide an estimate of need for the new plan period the Council has 'rolled forward' the AECOM estimate – so increasing need for the period up to 2039 to 56ha (251,505 sq m) for industrial uses and 37,030 sq m for offices.

Managing Losses

- 2.20 The ELR presented its results 'net' without any allowance for windfall or plan led losses. This was in line with emerging London Plan policy which required Boroughs to adopt a nil net loss approach. But this may mask a trend of continuing losses from the stock – as opposed to gains.
- 2.21 Data from the Valuation Office Agency (VOA) shows that Enfield lost around 60,000 sqm of industrial space lost in the three years since the 2016 base date used by AECOM.
- 2.22 Our office stock losses have been proportionally even higher with 22,000 sqm lost between 2016 and 2019.
- 2.23 In both cases, industrial and office, the likelihood is that this space was occupied at the time it was lost. The ELR noted an office vacancy rate of only 1.1% and an industrial vacancy rate 4.7% rate. Both rates are below rates considered healthy for frictional vacancy (at least 5%).

Summary

- 2.24 The estimate of economic need in the Plan is based on a series of studies, undertaken by AECOM, between 2016 and 2020. This work followed the PPG with the consultants promoting a 'labour demand' scenario informed by economic forecasts from the EEFM (Cambridge) and GLA Economics.
- 2.25 Ultimately the Council was recommended to plan for:
- A net increase of 32,200 sqm of office floorspace up to 2036 (37,030 sq m up to 2039); and

- A net increase of 48.6ha (218,700 sqm) of industrial and warehousing land up to 2036 (56ha/ 251,505 sqm up to 2039).

2.26 Compared to the GLA evidence available at the time, the recommendations for industrial land/floorspace broadly aligned with the GLA view as set out in the GLA Industrial Land Benchmarks study. For offices AECOM advised a more aspirational view of need – at least double the growth set out in the London Office Policy Review.

How has evidence been applied to the plan?

2.27 Our evidence was largely complete in early 2020 – just before the Covid emergency, and before changes were made to the London Plan by the Mayor in response to the Secretary of State’s directions, prior to its adoption in 2021.

2.28 It is very likely a review of the evidence will be needed as a result of these events, but it has not been appropriate to do this through the lockdown period due to a lack of clarity in how demand dynamics could change in the medium to long term.

Use Class E

2.29 Since the Council’s evidence concluded the Government has confirmed changes to the Use Classes Order and associated permitted development rights.

2.30 For this Topic Paper the most relevant change are those related to the new E use class. Offices were previously class B1a and light industrial B1c, but both are now included in the new Class E.

2.31 The NPPF/PPG has not been substantively updated, and it is still a requirement for the council to understand, and plan for, ‘business needs’ in the area.

2.32 Class E to residential permitted development rights are due to be introduced in August 2021. Buildings over 1,500 sqm are exempt, so their loss to residential would still be subject to the full planning process. Small premises can still be lost without planning control, although the Council is now able to consider the impact on the intended occupiers from the introduction of residential use in an area the authority considers is important for heavy industry, waste management, storage and distribution, or a mix of such uses. In the Enfield context this would appear to include designated industrial sites; namely Local and Strategic Industrial Sites as defined in the Development Plan.

Covid

2.33 All of the Borough’s economic evidence was completed prior to the Covid pandemic. Covid will have profound impact on the way we live and work and could influence the demand for employment floorspace over the Plan period. However, it is not clear exactly how the economy will recover. Almost all reliable data published predates Covid or reflects the ‘distressed’ Covid economy and needs to be treated with care.

2.34 The short-term impact of Covid has been extreme. The impact was particularly acute for offices as employees switched to home working. Industrial activity was harder to substitute for home working and much of the Borough’s industrial stock continued operation as ‘essential’ activities.

2.35 The Council does not under-estimate the short-term impact of the crisis. But for planning purposes, the pandemic has not removed the pre-pandemic capacity of land and floorspace to re-accommodate jobs and economic activity. An office that closed in lockdown remains available for re-occupation, though could also of course be subject to permitted development change to residential. Sites allocated in plans for economic

development remain available to be taken up post pandemic. So considerable care is needed before concluding that recovering from the pandemic needs more employment space.

- 2.36 In the short term then, space vacated in Covid remains available to be re-occupied as society recovers. But Covid has set in train a number of features that may now require the Borough to reconsider its assessment of need.
- 2.37 In recent years London has seen a reversal of fortunes for its industrial land demand. For many years demand was declining, sites were released for housing and local plans looked to manage this decline. But even pre-Covid this reversed with a widespread recognition that many boroughs (including Enfield) needed to grow its stock of industrial land, as is evidenced by the demand forecasts in the London Industrial Land Demand Study (2017) and Enfield's ELR.
- 2.38 This was partly driven to an improved manufacturing outlook but also a growing demand for logistics space – the presence of large distribution warehouses in the borough demonstrates this. Almost all emerging evidence suggests Covid has dramatically sped up this trend. But demand is not just coming from logistics – Enfield has also experienced demand for space from other sectors, most notably the Film and TV sector. There are currently three large format film studios in the borough and growing interest from the sector.
- 2.39 For offices this is much less certain – staff are only just starting to return to offices and in many instances this is on a hybrid basis with much greater emphasis on home working than pre-Covid. On one hand an increase in homeworking may reduce the need/demand for offices but conversely social distances means office space may not be as intensively used as previously.

3. Economic supply in Enfield

Assessing supply

- 3.1 Following the requirements of the NPPF, a robust assessment is an important source of evidence to inform the Local Plan and seeks to establish realistic assumptions about development potential of the land identified and when development is likely to occur.
- 3.2 An assessment was carried out in line with the methodology set out in the Government's National Planning Practice Guidance (NPPG) - Housing and economic land availability assessment (July 2019).¹
- 3.3 In summary, the method comprises the following five stages:
 - Stage 1 - Identification of sites and broad locations with potential for development.
 - Stage 2 - assessing their development potential including site suitability, availability and achievability.
 - Stage 3 was omitted as the NPPF and NPPG indicates this is only appropriate for housing sites.
 - Stage 4 – reviewing the assessment.
 - Stage 5 – assessing the core outputs to inform the evidence base for the Local Plan.
- 3.4 The site assessment process is set out in Appendix B of this topic paper.
- 3.5 The detailed assessment of sites can be found in the forthcoming HELAA (2021).

Calculating capacity

- 3.6 For sites with potential as employment-led site allocations, the indicative capacity set out in Figures 4 and 5 below have been assessed by applying a plot ratio of 65%, in line with London Plan guidance.²
- 3.7 However, a more tailored approach has been followed for sites where existing activities need to be re-provided as part of a redevelopment scheme. In these cases, the floorspace figure has discounted re-provided floorspace.

Industrial and logistics: urban supply

- 3.8 A number of employment sites were identified as developable or potentially developable in the HELAA assessment exercise and so were carried forward as part of the site selection assessment.
- 3.9 The Council first looked at the potential of urban sites in order to prioritise the more efficient use of urban land and safeguard the Green Belt from development. Figure 4 sets out the urban sites identified for employment-led site allocations. A map of these sites can be found in Appendix C of this report.

¹ <https://www.gov.uk/guidance/housing-and-economic-land-availability-assessment>

² London Plan, p. 179.

Site ID	Site address	Estimated additional capacity (sq m)
Mixed use sites		
SA8	Sainsburys Baird Road	20,865
SA39	Travis Perkins Palmers Green	3,209.5
SA32	Sainsburys Green Lanes	13,325
SA30	Claverings Industrial Estate	TBC
Employment only sites		
SA47	Crown Road Lorry Park	4,530
SA48	Ravenside Retail Park	21,645
SA50	Land to the south of Millmarsh Lane, Brimsdown Industrial Estate	10,500
SA51	6 Morson Road	2,600
SA52	Montagu Industrial Estate	6,613
SA30	Claverings Industrial Estate	TBC
Total		83,288

Figure 4 Urban Sites

- 3.10 Mixed use development sites offer the potential for industrial and logistics activity to be accommodated alongside other land uses. None of these sites are subject to policy or environmental designations that would prevent redevelopment for employment-led purposes.
- 3.11 The Sainsburys sites at Baird Road (SA8) and Green Lanes (SA32) offer potential for ground floor employment uses with residential above. A replacement retail store was not specified in either Call for Sites submissions. The owners have indicated their aspirations to redevelop the sites for a mix of uses, including employment activities. The developable area of the Green Lanes site has been calculated to retain the generous landscaping and mature trees at the perimeter of the site.
- 3.12 Palmers Green Travis Perkins builders' merchants has potential for mixed use development. Whilst the introduction of additional employment floorspace is not

specified in the Call for Sites submission, it is considered that there is some potential for additional ground floor employment uses alongside the reprovided builders' merchants.. The site (SA39) has potential for residential uses above a reprovided builders' merchant plus additional ground floor employment as it is not located within SIL.

- 3.13 Several sites are suitable for solely industrial and logistics redevelopment. None of these sites are subject to policy or environmental designations that would prevent redevelopment for employment-led purposes.
- 3.14 The site with most potential is Ravenside Retail Park (SA48). Although the site was promoted by a third party, the landowner has informally expressed an interest in redeveloping the site for industrial/ logistics purposes. The site is currently occupied by large format retail stores and is close to existing designated employment sites and the strategic road network, so offers a good prospect for redevelopment for employment purposes.
- 3.15 Both Crown Road Lorry Park (SA47) and 6 Morson Road (SA51) are located within SIL. The former is under-occupied, and the latter does not have any buildings on site. Redevelopment offers the potential for an increase in employment floorspace.
- 3.16 Montagu Industrial Estate (SA52) and Claverings Industrial Estate (SA30) are council-owned sites with potential for redevelopment. The latter is occupied by multistorey buildings so further work is needed to ascertain development potential. Both sites are currently in industrial use so they do not represent 'new' supply, but there is potential to increase industrial floorspace at these locations.
- 3.17 As set out in Figure 4, the total urban supply amount to 83,288 sq m, or 33% of identified need for floorspace for industry and logistics. This can be expressed as 18.5ha of land for industry and logistics.

Industrial Intensification

- 3.18 The Council is keen to make the most of our stock of employment land. Industrial intensification, delivering more efficient multi-storey formats, offers a way of accommodating an uplift in industrial and logistics floorspace within the urban area, reducing the need for new employment sites.
- 3.19 The London Plan provides a supportive policy framework. Policy E7 indicates that:

“Development Plans and planning frameworks should be proactive and consider, in collaboration with the Mayor, whether certain logistics, industrial and related functions in selected parts of SIL or LSIS could be intensified to provide additional industrial capacity.”
- 3.20 The GLA has provided practice guidance for boroughs to follow in order to develop their plan strategies in line with the London Plan.³
- 3.21 AECOM and Avison Young (AY) were commissioned to carry out an industrial intensification study (2020) following the GLA guidance. It is important to note that the AECOM evidence applies the GLAs definition of industrial intensification and intensified space is only counted where it exceeds the current floorspace on site or a 65% plot ratio redevelopment.

³ https://www.london.gov.uk/sites/default/files/136_industrial_intensification_and_co-location_study_-_design_and_delivery_testing_reduced_size.pdf

- 3.22 The AECOM/ AY suite provides an up-to-date analysis of Enfield's industrial land and estimates the likely floorspace which could be delivered through intensifying existing industrial land in the borough. It builds on the 2018 Employment Land Review's analysis of industrial employment clusters with potential for intensification in the borough by assigning categories to the sites within them based on a comprehensive assessment of capacity including technical and market deliverability considerations.
- 3.23 Of the 297 sites assessed, 13 were identified as having potential for accommodating intensification. The study makes an assessment of the average uplift in floorspace which could reasonably be expected to come forward on these sites, totalling 198,500 sq m, or 91% of the net floorspace requirement identified in the Employment Land Review (2018) to 2036. This represents 79% of the need for industrial and logistics floorspace to 2039.
- 3.24 However, this work was not thoroughly tested for viability or deliverability. The London Plan Inspectors found that the London Plan strategy, and especially its reliance on intensification to meet economic needs was not realistic. Viability and deliverability were raised as a particular challenge and the Inspectors concluded that Green Belt release was very likely to be needed. This adverse Inspectors report has implications for the assessment of intensification potential.
- 3.25 The Council commissioned Stantec and Grant Mills Wood (GMW) to carry out a robust Market Deliverability Study (2021) to assess the findings with a bottom up view of demand and deliverability. GMW are agents active in the local market and well placed to advise the Council on the 'realism' of the AECOM work.
- 3.26 In summary this further work concluded that it would not be sound to rely on the full quantum of intensified space identified by AECOM.
- 3.27 Two main reasons are discussed in the Stantec/GMW report. First the issue that upper floor industrial space is generally more expensive to deliver but at the same time less attractive to occupiers. This is particularly the case where intensified formats are reliant on goods lifts to access upper floors.
- 3.28 Secondly the qualitative mix of some formats of intensified space does not meet the Boroughs identified economic need – nor the main driver of industrial demand in Enfield. Enfield has a buoyant industrial market and is one of the prime locations for logistics – which would struggle to operate from some of the AECOM formats.
- 3.29 The Stantec work concluded that it would not be sound to rely on some intensification formats – generally where the format suggested by AECOM promoted the replacement of industrial and logistics space with 'light' workshop space on upper floors. But Stantec found that the strength of the logistics market in Enfield was such that some formats of intensified space were likely to become viable over the life of the plan, particularly formats that provided ramp access to upper floors and so could be used by logistics firms. GWM reported active developer interest in intensified logistics space – with their clients exploring new style logistics formats. Such proposals had not yet reached the planning stage, but the market was moving in a positive direction.
- 3.30 The Stantec work recognised the 198,500 sq m as a maximum capacity (as identified by AECOM) but for viability and deliverability reasons the ELP should not rely on all this space to meet needs.
- 3.31 The Stantec work recommended that the Council look to rely only on the formats that were most likely to be viable and deliverable in the plan period. These are still intensified formats but generally less intensive formats than the maximum cited in the

AECOM work. The Stantec evidence recommended that the council only 'count' for plan making purposes 104,223 sqm of intensified space.

- 3.32 It is relevant here to note that the site with the most potential to deliver intensified space is found at the East Bank area of Meridian Water (Harbet Road) (ST77 & ST92 in the AECOM work).
- 3.33 The AECOM ELR (2018) recommended this area remain as SIL and the intensification evidence, building on this recommendation, highlighted this area as one which would meet a significant amount of the borough's economic needs over the plan period through the delivery of intensified space. Together, ST77 and ST92 represent 67.4% of total intensification potential.
- 3.34 However; the Meridian Water area is one where the Council has been looking at large scale regeneration for many years. This programme of regeneration was put in train well before the current shortage of industrial property became so acute and the London Plan policies significantly tightened.
- 3.35 At present it is understood that there is no prospect of the Meridian Water landowners implementing the AECOM recommendations for the East Bank area, even though the Stantec/GMW work considered this as a realistic prospect over the plan period. It has been advised that it would be unsound to rely on this intensified space in the plan and to remove ST77 and the smaller ST92 as contributors to helping to meet industrial/logistics needs through intensification.
- 3.36 Their omission reduces significantly the contribution which intensification can make in meeting the borough's identified needs for industry and logistics floorspace. Intensification could therefore only deliver 34,009 sq m, or 13.5% of total need for industrial and logistics floorspace up to 2039. This can be expressed as 7.5ha of land.

Other sources of urban supply?

- 3.37 The council's evidence base suggests there will be negative demand for comparison retail over the plan period. This raises the question of how best to deal with declining demand for comparison goods floorspace.
- 3.38 The Local Plan proposes de-designation of the borough's retail parks as a response to this quantitative driver. The London Plan provides a supportive policy framework for the managed transition of out-of-centre retail to other uses (Policy SD7).
- 3.39 Angel Road Retail Park (to the south of Eleys Estate) was de-designated as part of the Edmonton Leaside Area Action Plan (ELAAP). ELAAP identifies the site as a mixed-use employment location.
- 3.40 As has been discussed earlier, the owners of Ravenside Retail Park have aspirations for logistics-led redevelopment of the site.
- 3.41 In addition, Colosseum Retail Park in Southbury has been granted consent for mixed use redevelopment.
- 3.42 This leaves Enfield Retail Park and De Mandeville Retail Park, both situated on the A10 close to Southbury. These adjacent retail parks are already subject to redevelopment interest – the Morrisons and Sainsburys stores have been submitted as part of the Council's Call for Sites for mixed use redevelopment.

- 3.43 Five remaining sites within these retail parks have been identified as having some future potential for industry and logistics-led redevelopment. They comprise large format retail stores dating from the 1990s with an average of 30% site coverage.
- 3.44 If these sites came forward for redevelopment, they could provide approximately 53,580 sq m of industrial and logistics floorspace, assuming single storey development at a 65% plot coverage. This is equivalent to 21% of floorspace need up to 2039 and could be expressed as 12ha. This represents an indicative minimum, as more capacity could be gained by assembling sites to deliver larger intensified formats.
- 3.45 However, this initial desktop assessment is insufficient for this floorspace to robustly 'count' towards employment land supply for the purposes of the ELP.
- 3.46 The Council is nevertheless keen to manage the decline of physical comparison retail and ensure the future of these sites are properly and sustainably planned for. The ELP has identified these sites as potential future industrial locations, in recognition of the need for employment floorspace and their suitability to accommodate industrial and logistics activities.

Duty to Cooperate

- 3.47 As part of Duty to Cooperate (DtC) discussions, the Council reached out to local authorities within the FEMA area to explore whether there was any potential for Enfield's employment land needs to be met outside the borough boundaries.
- 3.48 Discussions have not been fruitful. Many DtC authorities face the same strategic challenges as Enfield, and most have limited capacity to meet their own needs. DtC partners have formally indicated that they are unable to help with meeting Enfield's employment need.
- 3.49 The Council is however continuing discussions and remains open to exploring potential for Enfield's employment land needs to be met with the cooperation of FEMA partners.

Green belt sites

- 3.50 Taken together, urban sites and industrial intensification sites have the potential to provide 117,297 sq m, equivalent to 47% of total need for industry and logistics floorspace up to 2039. This could be expressed as 26ha of land.
- 3.51 This leaves a shortfall of roughly half of the floorspace needed for industry and logistics. In order to address this shortfall, we examined the potential of sites located outside the urban area to be redeveloped for industry and logistics.
- 3.52 Following the site assessment and selection process set out in Appendices A and B of this report, five sites currently designated as Green Belt have been identified as being potentially appropriate and developable locations for industrial and logistics development.

Site ID	Site address	Estimated additional capacity (sq m)
SA49	Land at 135 Theobalds Park Road	3,250

SA53	Land West of Rammey Marsh	70,200
SA54	Car Park Site, Wharf Road	5,115
SA55	Land East of Junction 24	30,550
SA56	Land to the North West of Innova Park	16,445
Total		125,560

Figure 5 Green Belt Sites

- 3.53 With the exception of Land at Theobalds Park Road (SA49), which has been put forward for a mix of industrial and retail uses, all the Green Belt sites proposed for allocation are for solely industrial and logistics purposes.
- 3.54 The Car Park site at Wharf Road (SA54) is undeveloped but owned by a developer who aspires to develop the site for employment/ industrial purposes. It is located close to existing SIL.
- 3.55 The site with the most quantitative potential for new industrial and logistics development is Land West of Rammey Marsh (SA53). The site is close to the M25 with logistics occupiers close by. The site has been promoted for development in two separate Call for Sites submissions by Enfield Council and Lee Valley Regional Park Authority respectively (two of the three landowners of the site).
- 3.56 However, the eastern portion of the site is designated SINC and flood risk zone 3 – for this reason this portion of the site has been excluded in calculating the potential developable area. The site is also designated as a local open space. The site is also being investigated as a potential location to deliver improvements to the road network. If these considerations could satisfactorily be addressed, the site could accommodate new industrial and logistics development.
- 3.57 Land to the North West of Innova Park (SA56) is located close by and is owned by a development company with aspirations for employment/ industrial redevelopment. Developing the two sites in tandem could yield benefits.
- 3.58 Land East of Junction 24 (SA55) is an 11ha site which spans the boundary between LB Enfield and Hertsmere, close to the M25. 4.7ha of the site lies within LB Enfield. The Hertsmere part of the site was submitted to Hertsmere’s Call for Sites in 2021.
- 3.59 The entire site is owned by Enfield Council, who have aspirations for employment/ industrial development. The development of the wider site would require close collaboration between Enfield and Hertsmere, and it is estimated that approximately 5ha of the site could come forward during Enfield’s plan period.
- 3.60 The capacities of the Green Belt sites have been calculated in line with the method set out in section 4.2. Taken together, the Green Belt sites have potential to provide 125,560 sq m of industrial and logistics floorspace, or 50% of identified needs up to 2039. This could be expressed as 28ha.
- 3.61 The development of green belt sites, alongside urban supply, have the potential to meet almost all industrial and logistics needs up to 2039.

Office supply

- 3.62 No sites have been allocated for significant office development. This is due to a lack of suitable sites coming forward as part of successive rounds of Call for Sites exercises.
- 3.63 However, some office supply may be forthcoming from current planning applications. These can be identified on the completion of the HELAA.
- 3.64 Whilst no sites can justifiably be allocated for significant office development, the local plan contains supportive policies to encourage office development in town centre locations and seeks to control losses where planning powers allow the local planning authority to do so.

Sites not carried forward to allocation

- 3.65 As detailed above the Council has a very limited supply of new land in the face of a positive requirement for additional floorspace.
- 3.66 The HELAA will set out site analyses and reasons for their inclusion or exclusion as Local Plan site allocations. Two of these sites are profiled in more detail below because they are relevant to the Council's employment policies.
- 3.67 Meridian Water East Bank (Harbet Road) (CFS139) is currently designated SIL.
- 3.68 The site has been put forward for the site for mixed use redevelopment. It has not been allocated for mixed use because de-designation of SIL at this stage would be difficult to justify for the following reasons:
- The Borough has an identified net need for floorspace for industry and logistics,
 - The proposals would result in the net loss of employment floorspace, and
 - The site is not currently available and not expected to be so for a further 15 years.
- 3.69 Elsewhere in the Borough – at Brimsdown – the site promoter has illustrated how they could deliver a mixed-use redevelopment scheme on land designated as SIL (CFS149). The site was not allocated for the following reasons:
- Redevelopment of the site would require de-designation from SIL status for a central east-west portion of the site, cutting through the centre of Brimsdown Industrial Estate.
 - High density residential-led mixed use development close to existing SIL occupiers and proposed intensified industry would create conflicts between incoming residential occupiers and businesses. This would negatively affect the integrity and effectiveness of the remaining SIL, and the operation of businesses within this location.
 - Additional employment floorspace is proposed through industrial intensification. Whilst the Local Plan strongly supports industrial intensification, it is not clear if intensified typologies capable of delivering an uplift of 31,000 sq m would be viable during the plan period.

- 3.70 Whilst it may be possible to deliver replacement floorspace via a mixed-use scheme, such solutions do not maximise the potential for sites to be assembled and intensified for industrial purposes.
- 3.71 Given this context, the net additional 31,000 sq m represents a poor yield for a 20ha SIL site. It is also unclear whether the 31,000 sqm is net additional given the GLAs definition of intensified space measures intensification from either the floorspace on site or from a 65% plot ratio hypothetical scenario. A mixed-use redevelopment proposal may not maximise the contribution the site could potentially make to meeting economic needs over the life of the plan.
- 3.72 Releasing SIL is not a matter the Council considers lightly given the need to maximise urban potential as a priority.

4. Summary and conclusions

Introduction

- 4.1 The Topic Paper has summarised the council's assessment of need, undertaken by AECOM in 2018 following the guidance set out in PPG.
- 4.2 This has identified a positive need for:
 - 251,505 sqm of net additional industrial floorspace, and
 - 37,030 sqm of net additional office floorspace.

Supply

- 4.3 In response to a positive need for more industrial and office space the Council has looked to maximise the use of brownfield land where possible. However; it is unlikely that Enfield can meet its needs from only brownfield land.

Urban sites

- 4.4 Several urban sites have come forward for redevelopment for employment purposes. A number of these are currently retail sites – the economics of a post covid economy suggest that a broader range of uses could beneficially be explored at these locations. Our retail evidence base suggests that this may indeed be the case.
- 4.5 Several urban sites are currently in employment use but underused (such as Crown Road Lorry Park and 6 Morson Road). Enfield's buoyant industrial land market supports demand for more intensive uses at these locations.
- 4.6 In addition, we have highlighted the potential of several large format retail sites at the A10 corridor. The ELR did not assess these sites because they were in active retail use and, at the time, there was no prospect that they could be delivered as new employment sites. However, they have potential as new urban industrial locations, but cannot be counted against our need on the basis of current evidence.
- 4.7 The limited supply of new sites but a positive need makes it very hard to substitute industrial land and facilitate the release of designated industrial sites. If, or when, additional capacity is identified, we need to use this to meet our growth needs before we actively consider releasing land from industrial designations.
- 4.8 Very little new office supply has been identified but this is not surprising given the ELR took an 'aspirational' view to assessing office needs in the plan and the office market has been struggling to deliver new space. However; there is scope to address office needs in town centres and via mixed use redevelopment proposals, including at Meridian Water. The Council will keep its office policy and evidence under special review given the need to respond quickly to the post Covid market.

Industrial Intensification

- 4.9 Industrial Intensification is one of the most challenging areas of policy and evidence. The London Plan has a strong focus on maximising the capacity of designated industrial sites in London to meet economic needs.
- 4.10 Large parts of Enfield's employment portfolio is under used and has potential to be redeveloped resulting in a net increase in industrial floorspace. The Council has

undertaken considerable work to understand the scope for industrial intensification to meet economic needs.

- 4.11 The Stantec/GWM work concluded that some of the formats tested by AECOM were unlikely to be deliverable. But the strength of the logistics market in Enfield is such that intensified space, purposely designed to meet the needs of logistics firms, is likely to become viable in the plan period. In summary, if the Borough is to accommodate its growth 'need' the most likely route was via logistics driven intensification on larger sites and particularly SIL sites where 24-hour operation is possible.
- 4.12 Total industrial intensification potential in the borough amounts to 34,009 sq m.

Duty to Cooperate

- 4.13 The Council reached out to Duty to Cooperate partners, who have formally confirmed they are unable to help Enfield in meeting identified employment land needs. The Council remains open and willing to engage in further discussions.

New Green Belt Sites

- 4.14 The Council will continue to work with developers to encourage industrial intensification – with the priority to maximise industrial intensification potential by retaining strong policy designations (SIL/ LSIS).
- 4.15 But even with these protections in place it is unlikely that Enfield can meet its needs in full. The future of Meridian Water illustrates the dilemma the Council faces balancing the needs of core SIL activities with wider plan making and policy objectives.
- 4.16 As a result, the ELP is proposing selective releases of Green Belt land for industrial use. These Green belt sites include Land at Rammey Marsh, Land to the North West of Innova Park, and the Car Park site at Wharf Road.
- 4.17 The addition of Green Belt sites to urban and intensified sites will allow the council to meet almost all industrial and logistics needs in full (242,857 sq m)
- 4.18 By retaining the SIL designations for key sites for the time it is expected that this would work to encourage land assembly to deliver intensified industrial space and maximise the potential of brownfield sites to meet economic needs.

Appendix A: Land availability assessment process

The area selected for assessment was the plan-making area. The assessment took into consideration sites identified through three 'Call for Sites' exercises, sites submitted by Enfield Road Watch in collaboration with the Enfield Society and CPRE, London SHLAA 2017 sites, and pre-application sites.

A sift was then applied to remove sites which were:

- smaller than 0.25ha in size (the threshold at which employment sites should be assessed in Economic Development Needs Assessments based on PPG)
- subject to submitted planning applications for non-employment uses
- currently in residential use

In accordance with the National Planning Practice Guidance, sites were then assessed to determine their availability, suitability and achievability.

Sites submitted to the Council's Call for Sites exercise by either a) a landowner or site promoter, or b) by a third party with evidence of availability from a landowner or site promoter were considered to demonstrate evidence of availability, sufficient for them to be counted in the study. Sites which were submitted solely for housing redevelopment are considered not to be available. Sites which were submitted for employment uses, or for a mix of uses which could include an employment component, are considered to be available.

The suitability of sites was then assessed with regard to several key environmental and policy criteria, as set out in the Housing and Economic Land Availability Assessment (HELAA). These include 'level 1' constraints such as SSSI or Ancient Woodland designation which would merit the exclusion of the site. 'Level 2' constraints, such as Green Belt or MOL designation, are not cause alone for a site to be excluded, but rather this constraint would cause a site to be considered potentially suitable, and further work was undertaken to assess whether there is a need to review policy designations.

To establish whether a site is 'achievable' entailed a judgement on whether there is a reasonable prospect that the particular type of development will be developed on the site at a particular point in time. This is essentially a judgement about the economic and viability of a site, and the capacity of the developer to complete and let or sell the development over a certain period.

This process led to sites being classified as follows:

- Sites classified as "deliverable" or "developable" may be expected to be developed within the next 15 years.
- Sites classified as "potentially developable" comprise a basket of sites from which some might be deemed developable following further consideration through the local plan process.
- Sites classified as "not developable within the next 15 years" cannot realistically be expected to be developed in the foreseeable future.

The classification of sites can be found in the HELAA (2021).⁴

⁴ <https://new.enfield.gov.uk/services/planning/evidence-base/>

This assessment exercise was then supplemented by a further site selection process to determine which sites were allocated for employment-led uses in the local plan.

Appendix B: Site Selection Methodology

Site Assessment Process Overview	
Stage 1: Identification and initial sift of sites	<ul style="list-style-type: none"> • Stage 1a: Identification of sites • Stage 1b: Assessment of absolute constraints • Stage 1c: Size threshold (50 homes+ or 0.25ha / 500sqm or 0.25ha)
Stage 2: Promoting a Sustainable Pattern of Development	<ul style="list-style-type: none"> • Stage 2: Sites considered on a sequential approach directing growth to specific locations, based on the overall hierarchy which: <ul style="list-style-type: none"> ○ Prioritises land in the urban area, then ○ Prioritises brownfield land in the Green Belt, then ○ Prioritises lower performing land in the Green Belt
Stage 3: Detailed Planning Assessment	<ul style="list-style-type: none"> • Stage 3a: Consideration of technical constraints (e.g. highways) • Stage 3b: Consideration of other non-absolute constraints (e.g. historic/ecological etc.)
Stage 4: Integrated Impact Assessment	<ul style="list-style-type: none"> • Stage 4: Identify any significant negative effects that may require mitigation if site is put forward for allocation
Stage 5: Deliverability	<ul style="list-style-type: none"> • Stage 5: Does the evidence indicate that the site could be delivered within the plan period?
Stage 6: Overall Conclusion	<ul style="list-style-type: none"> • Stage 6: Identification of preferred site allocations.

Appendix 3: Map

