

Enfield Local Plan

Employment Topic Paper

March 2024



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1. Policy context

- 1.1 A crucial issue for the Enfield Local Plan (ELP) is the extent to which the supply of employment sites can meet identified needs.
- 1.2 This requirement is grounded in national policy, as articulated in the National Planning Policy Framework (NPPF), which 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.' (Paragraph 11). It indicates that plans should *'be prepared positively, in a way that is aspirational but deliverable.'* (Paragraph 16).
- 1.3 Strategic policies need to *'make sufficient provision for housing, employment, retail, leisure and other commercial development.'* (Paragraph 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.'* (Paragraph 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'* (Paragraph 23).
- 1.4 Additionally, the NPPF 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.'* (Paragraph 86).
- 1.5 Planning Practice Guidance (PPG) provides further details on how economic needs and supply should be assessed. In July 2019, further advice on planning for warehousing and logistics was provided, emphasising the role of the sector and how their needs can be assessed (para 031 Reference ID: 2a-031-20190722).
- 1.6 At a regional level, the London Plan requires London boroughs to provide and maintain *'A sufficient supply of land and premises in different parts of London to meet current and future demands for industrial and related functions ... taking into account strategic and local employment land reviews, industrial land audits and the potential for intensification, co-location and substitution.'* (Policy E4). Boroughs should also define and develop policies for Strategic Industrial Locations (SILs) (Policy E5) and Locally Significant Industrial Sites (LSIS) (Policy E6).
- 1.7 Whilst not a planning' document, Enfield's plan for 2023-26, 'Investing in Enfield' emphasises the ambition to foster an 'economy that works for everyone.'¹ As part of this, the Council has made a commitment to 'transform our industrial land to create modern and low carbon spaces for business.'

¹ https://www.enfield.gov.uk/data/assets/pdf_file/0022/34087/Enfield-Council-Plan-2023-2026-Your-Council.pdf

2. Economic need in Enfield

Introduction

- 2.1 In mid-2016, AECOM was commissioned to conduct an Employment Land Review (ELR) for the Borough, following the guidance outlined in the Planning Practice Guidance (PPG). The ELR was finalised in 2018.
- 2.2 The needs assessment contained within the 2018 ELR informed the employment target outlined in the Regulation 18 draft Enfield Local Plan (ELP) of 2021. This assessment forecast 'economic' needs until 2036, which were 'rolled on' to cover for the plan period up to 2039.
- 2.3 In summary, the Regulation 18 ELP of 2021 sought to address:
- A net increase of 32,200 sqm of office floorspace by 2036 (equivalent to 37,030 sq m up to 2039); and
 - A net increase of 48.6 ha (equivalent to 218,700 sqm) of industrial and warehousing land by 2036 (56 ha or 251,505 sqm by 2039).
- 2.4 Considering the significant changes in the economic landscape since 2016-18, notably Brexit, the Covid Pandemic, the war in Ukraine, and high inflation, a new ELR and associated needs assessment were commissioned in 2023.
- 2.5 This section provides a synopsis of the insights from the material in the 2023 ELR with regards to economic need.

Assessment of economic need

- 2.6 The primary assessment of 'need' is predominantly documented within the 2023 ELR.
- 2.7 The PPG provides three overarching approaches to assessing economic needs, which include:
- Labour supply;
 - Projections based from historical trends of development completions; and
 - An assessment based on labour demand (economic forecasts).
- 2.8 The 2023 ELR conducted four updated assessments regarding future demand for industrial and office spaces, which encompass:
- Three assessments based on historical trends –
 - Two evaluations related to competed floorspace utilising data from five and ten-year trend periods respectively; and
 - One assessment focused on job changes over a four-year period between 2015-19, using data sourced from leading economist house Experian Economics.
 - The fourth assessment used the latest economic forecast (June 2022) also provided by Experian Economics.

Industrial (including core industrial and warehousing)

2.9 Below are tables presenting the outcomes of the four assessments for industrial floorspace need. Firstly, the table focus on core industrial requirements, followed by warehousing needs, and finally provide an aggregate overview, encompassing both core industrial and warehousing requirements.

Table 1: Core industrial floorspace - summary of the 2019-41 demand assessments

Demand 2019-41	1	2	3	4
	Past trends 5 year Completed floorspace sq m	Past trends 10 year Completed floorspace sq m	Past trends 4 year Job change sq m	Economic forecast sq m
Net demand	121,554	42,123	673,456	32,278
Gross demand	121,554	42,123	673,456	32,278
Gross demand per annum	5,525	1,915	30,612	1,467

2.10 For core industrial needs, the past trends approach (based on a ten year completed floorspace) and economic forecast demonstrate a broad alignment, contrasting with the past trends (i.e. a four year job change), which appears to deviate as an outlier.

Table 2: Warehouse floorspace - summary of the 2019-41 demand assessments

Demand 2019-41	1	2	3	4
	Past trends 5 year Completed floorspace sq m	Past trends 10 year Completed floorspace sq m	Past trends 4 year Job change sq m	Economic forecast sq m
Net demand	184,779	100,710	781,305	264,816
Gross demand	186,621	102,553	783,147	266,658
Gross demand per annum	8,483	4,661	35,598	12,121

2.11 Similar to core industrial, the past trends (i.e. a five year completed floorspace) indicate a strengthening demand over the past 5 years compared to the longer term perspective. Notably, over the past decade, the delivery of warehousing floorspace has exceeded twice the amount compared to core industrial.

Table 3: Total industrial and logistics floorspace - summary of the 2019-41 demand assessments

Demand 2019-41	1	2	3	4
	Past trends	Past trends	Past trends	Economic
	5 year	10 year	4 year	forecast
	Completed floorspace	Completed floorspace	Job change	
	sq m	sq m	sq m	sq m
Net demand	306,333	142,834	1,454,761	297,094
Gross demand	308,176	144,676	1,456,603	298,936
Gross demand per annum	14,008	6,576	66,209	13,588

2.12 The table provided above presents the demand for the industrial market in aggregate, encompassing both core industrial and warehousing activities. This aggregation is reflective of the practical reality that there exists a singular property market catering to the needs of manufacturers, logistics operators and other forms of industrial use. These entities share similar locational, site and premises characteristics.

2.13 When considering core industrial and warehousing collectively, the past trends' data illustrates the strength in demand observed over the past five years. However, the past trends (4 year job change) approach is predicated on a period marked by accelerated growth in the recent past (2015-19), which the 2023 ELR identified as generating:

'an extreme floorspace demand that does not accord with any other approach nor is it reflective of the market. We must therefore treat this as an outlier' because it generates a demand in excess of the Borough's total current stock of industrial floorspace, which is clearly a position that does not pass any sense test.'

(Para 7.59).

2.14 Consequently, the past trends (4 year job change) approach is disregarded.

2.15 Notably, the economic forecast closely aligns with the past trend (i.e. five year completed floorspace) approach, which also resonates with the perspective of the property market. Based on the recommendations from the 2023 ELR, the Council is advised to proceed with the five year past trend assessment, considering it as the more positive of the two assessments.

2.16 The use of the five year past trend is considered to be the most positive and robust approach, as the economic forecast is likely to underestimate the need for warehousing space. This discrepancy arises because the Experian model allocates 'delivery to customer' jobs to the retail sector, whereas in reality these roles are likely to require warehousing space.

Office

2.17 The table provided below illustrates the decline in office employment in Enfield, accompanied by associated reduction in office provision. Notably, all past trends exhibit a negative trajectory.

Table 4: Office floorspace - summary of the 2019-41 demand assessments

Demand 2019-41	1	2	3	4
	Past trends	Past trends	Past trends	Economic
	5 year	10 year	4 year	forecast
	Completed floorspace sq m	Completed floorspace sq m	Job change sq m	sq m
Net demand	-135,832	-89,451	-40,471	28,143
Gross demand	-151,098	-104,718	-55,738	43,410
Gross demand per annum	-6,868	-4,760	-2,534	1,973

2.18 The 2023 ELR projects a relatively stagnant trajectory concerning office space. Notably, the losses driven by the Permitted Development Rights (PDR) have already taken place, resulting in a relatively low supply aligned with relatively low demand. Among the various scenarios considered, the economic forecast presents the most positive scenario, albeit situated at the 'optimistic end' of the spectrum characterised by a relatively flat trajectory.

2.19 Recommended by the 2023 ELR, the economic forecast is advised to be adopted to integrate opportunities within the office market. This strategic decision aims to benefit on potential improvements in demand throughout the plan's lifespan.

Market balance

2.20 Considering the existing supply, the 'balance to find' is as follows:

- For industrial/ logistics, the requirement amounts to 303,525 sqm. This is rounded to **304,000 sqm**. This is based on a 5 year past trend approach.
- For office space, the need is estimated at 40,009sqm. This is rounded to **40,000 sqm**. This is derived from the economic forecast approach.

2.21 The assessment of industrial/logistics need exceeds the Regulation 18 figure of 251,505 sqm. This variance is attributed to the extended plan period, now reaching 2041, coupled with the anticipated improvement in economic conditions by the Experian model towards the end of the plan period. Notably, the 2023 ELR notes the current undersupply in the market, emphasising the urgency to prioritise the front-loading of land supply as far as possible before more intensified formats become viable.

2.22 Conversely, the office space requirement slightly falls below the Regulation 18 figure of 37,000 sqm. Given the significant losses observed over the past decade, any positive figure may be questionable. However, as previously mentioned, the benefits of a positive need figure lies in its potential to offset losses and accommodate future growth in office supply should market dynamics shift. The 2023 ELR recommends prioritising short term supply at recent rates, acknowledging the potential for market changes by the plan's review.

Alignment with the London Plan

- 2.23 The evidence base from the London Plan with regards to employment needs primarily includes:
- London Industrial Demand Study (LILDS) (2017)
 - London Office Policy Review (LOPR) (2019)
- 2.24 According to the LILDS, there is a projected need figure for 52 ha over the 25 year period from 2016 to 2041, equivalent to 338,000 sqm (calculated using a 65% plot ratio) of 13,520 sqm per annum. This figure broadly aligns with the industrial/logistics requirement identified in the 2023 ELR of 13,818 sqm per annum.
- 2.25 The LOPR indicates a need figure of 43,658 over the same 25 year period, averaging 1,746 sqm per annum. Although, slightly lower, this aligns closely with the office space requirement identified in the 2023 ELR of 1,818 sqm per annum.

Covid

- 2.26 The impacts of the Covid-19 pandemic, along with the resulting shift to remote/home working, continue to shape business practices and real estate markets.
- 2.27 Remote working has become a daily reality for many individuals, prompting some employers to rationalise their real estate portfolios and reimagine offices as places primarily for meetings and collaboration rather than locations for a five day week working. Even in central London, vacancy rates have risen to 9.9%, accompanied by a decline² in leasing and investment activity. For Enfield's relatively 'small and insignificant office market' (LOPR, 2017) immediate future prospects are discouraging, as outlined in the LOPR of 2017. However, the plan adopts a positive approach to support potential future changes in the market.
- 2.28 Conversely, the outlook for industrial and logistics sector appears more promising. The decline in traditional bricks and mortar retail has led to a corresponding rise in home deliveries, driving demand for logistics floorspace. The northern part of the borough hosts large scale distribution hubs, such as Evri, Waitrose, John Lewis and Tesco, strategically positioned near the M25 and radial routes into central London. Additionally, the rise of streaming services has spurred the arrival of film and TV production companies such as OMA, OMAX, Troubadour, and London Film Studios, in recent years. These activities rely heavily on fast internet infrastructure supported by data centres, of which Enfield has several, albeit without experiencing the surge in applications seen in some west London boroughs in particular in recent years.
- 2.29 The abovementioned factors have collectively served to dampen the appetite for offices and bolster demand for industrial/ logistics floorspace. These trends, which were already underway before the pandemic, have accelerated due to Covid-19, particularly in terms of the shift towards online, home-based activities. These developments have implications for the future attractiveness of commercial properties.

² JLL (2023) Q2 2023 Central London Office Market Report <https://www.jll.co.uk/en/trends-and-insights/research/q2-2023-central-london-office-market-report>

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 identified land and the anticipated timing when development is likely to occur.
- 3.2 The 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).
- 3.3 In summary, the methodology comprises the five key 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 methodology for the Housing and Economic Land Availability Assessment, which sets out the process that has been followed to assess sites is set out in Appendix C of the HELAA (2023)³.

Changes to sites following Reg 18

- 3.5 Consultation on the Regulation 18 draft occurred in the summer of 2021, followed by an additional Call for Sites. The consultation and subsequent Call for Sites identified a number of new sites which subsequently were earmarked for allocation, including:
- Heritage House
 - Land and buildings to the south east of Stockingswater Lane
 - Land and buildings north of Lincoln Road
 - 5 Picketts Lock Lane
- 3.6 In addition, a review of the proposed allocations from the Regulation 18 stage led to the removal of the employment component from several mixed-use sites. This adjustment was prompted either by updated intentions from the site promoter or by a reconsideration of uses to aid in the delivery of positive placemaking. The sites no longer relied upon for employment delivery include:
- Sainsburys Baird Road

³ <https://www.enfield.gov.uk/services/planning/evidence-base>

- Sainsburys Green Lanes
 - Travis Perkins Palmers Green
- 3.7 The site at Land at 135 Theobalds Park Road site, initially proposed as an employment-led allocation in the Regulation 18 draft Enfield Local Plan, has not been retained for Regulation 19 due to evolving conclusions from the Green Belt work. Instead, this site has been considered as part of the wider Crews Hill strategic allocation.
- 3.8 Conversely, the Wharf Road Car Park site, allocated for employment in the Regulation 18 draft Enfield Local Plan, has not been taken forward to Regulation 19 due to evolving conclusions from the Green Belt evidence base.
- 3.9 The intensification evidence base has been further developed in anticipation of Regulation 19. Consequently, many employment sites without extant consents have had their site capacities reviewed – this is discussed in the ‘potential supply’ section below.

Extant planning consents

- 3.10 The short term supply consists of sites with extant planning consents for industrial redevelopment which have not yet been implemented.

Table 5: Extant planning consents for industrial development

Site	Planning ref	Net additional sqm
Heritage House	23/00824/FUL	22,060
Montagu Industrial Estate	22/00168/OUT	17,902
Riverwalk Business Park	21/04302/FUL	924
Snowbird Foods	21/00804/FUL	3,289
Meridian 7	19/02718/RE3	8,500
		Total: 52,675

- 3.11 The site capacities for these sites are taken from the planning consents. Heritage House is the only contemporary instance of an intensified format with granted planning consent in Enfield. While the sites under consideration may have intensification potential, and it remains possible that subsequent proposals might seek to increase floorspace delivery, their emergence occurs at a time when the viability of intensification is questionable within the context of London. Specifically, Montagu Industrial Estate holds significant intensification potential, yet this prospect remains unrealised given current market conditions.

Potential supply

- 3.12 The Regulation 18 draft Enfield Local Plan aimed to establish a positive planning framework to encourage intensification. However, a conservative approach was adopted when considering the capacities of employment sites. This decision was aligned with evidence indicating that a 65% plot ratio represented the median average for industrial plots in outer London, based on industrial schemes consented between 1 April 2011 to 28 February 2018.⁴ Moreover, the 65% approach to calculating industrial site capacity was referenced in a footnote to supporting text linked to Policy H5 of the London Plan.⁵
- 3.13 This conventional approach to calculating site capacities faced criticism from the GLA, as reflected in their representation to the Regulation 18 draft Enfield Local Plan consultation in 2021. The GLA recommended that:

'We propose that Enfield take a more optimistic and pragmatic approach, understanding that viability for industrial intensification will become more attractive from the middle of the Plan period. ... Brownfield sites should be allocated accordingly and earmarked for the viable intensification typologies.'

- 3.14 In response to this comment, the intensification evidence base underwent a thorough reassessment to understand the most suitable intensification typologies for the Enfield context and to address any necessary modifications to improve viability and deliverability.
- 3.15 The initial range of intensification typologies proposed is detailed in the AECOM and Avison Young (2020) report: 'Enfield Industrial Intensification Study: Final Draft Report.' Subsequently, the findings of this report were then scrutinised by Stantec and Grant Mills Wood, as document in their report titled: 'Enfield Industrial Intensification Market Deliverability Study.' (2021).
- 3.16 Following the review provided by Stantec and Grant Mills Wood, four intensification typologies emerged as having the best prospects to meet industrial and logistics needs in the Enfield context. These typologies are summarised as follows:

Typology B: Berlartza, Donostia-San Sebastian, Spain

- 3.17 This typology involves a collection of ground-dependent and small stackable units with clustered shared yards, along with LGV ramp and goods lifts designed to maximise efficiency.
- 3.18 The evaluation conducted by Stantec and Grant Mills Wood revealed that the 'B' typology, as outlined by AECOM, is not currently deemed suitable. However, with certain recommended adjustments, it could potentially facilitate the delivery of small and medium sized units. It is anticipated that this format may become a viable option at some stage during the plan period.'

⁴ Mayor of London (2018) 'Analysis of plot ratios in industrial development in London (2011-2018)' https://www.london.gov.uk/sites/default/files/analysis_of_industrial_development_plot_ratios_2011-2018.pdf

⁵ London Plan (2021) footnote 59, page 179.



Figure 1: Typology B

Typology D: Prologis Georgetown Crossroads, Seattle, USA

3.19 This typology entails a collection of large and medium units, with the potential to stack smaller light industrial spaces on top of the larger units, serviced by cargo lifts. HGV ramp access is provided at Level 1 and Level 2.

3.20 According to the assessment by Stantec and Grant Mills Wood, Typology D is deemed suitable and feasibly viable for delivery within the Enfield market. It was tested by GMW without light industrial components.'



Figure 2: Typology D

Typology E: Prologis Narashinio 4, Tokyo, Japan

- 3.21 This typology consists of a collection of large units catering both ground-dependent and stackable units. Each floor features an operational yard with direct HGV access facilitated by ramps.
- 3.22 According to the assessment conducted by Stantec and Grant Mills Wood, Typology E is considered suitable and potentially viable albeit only in very selective areas characterised by very strong logistics demand.'



Figure 3: Typology E

Typology F: Binck Twins Business Centre, The Hague, Netherlands

- 3.23 This typology encompasses as a group of small to medium units designed to accommodate both ground dependent and stackable uses. The configuration includes two storeys of industrial space with very light uses located above. Additionally, there are two level of operational yard with ramp access and parking facilities situated on the roof.
- 3.24 As per the assessment by Stantec and Grant Mills Wood, Typology F is deemed suitable provided that only the lower units are delivered. Implementing this approach would result in a reduction of the intensification yield by approximately one third.'



Figure 4: Typology F

- 3.25 As mentioned in the typology profiles above, Stantec and GMW have made a number of adjustments to the original typologies proposed by AECOM and Avison Young. For example, floor loading was increased to account for the needs of logistics occupiers, and the upper-level lighter space was reduced as it was less attractive and not in demand in the Enfield context.
- 3.26 Whilst typologies B and E remained unmodified, typology D's plot ratio was reduced from 100% to 88%, and typology F's plot ratio decreased from 126% to 85%.
- 3.27 These modified typologies were then applied to the seven sites which constitute the 'potential' supply. These sites were actively promoted for industrial redevelopment, though not necessarily for intensification.
- 3.28 Minimum site size requirements were determined based on the standards set out in Table 10 of AECOM and Avison Young (2020) study. The appropriateness of these typologies to Enfield's sub-areas was reassessed according to the standards set out in Table 13 of the same study.
- 3.29 The results of this analysis are set out in the table below:

Table 6: Net additional floorspace

Site	Net additional floorspace (sqm at 65%)	Net additional floorspace (sqm intensification min)	Net additional floorspace (sqm intensification max)	Developer aspiration
Land to the south of Millmarsh Lane	11,230	19,262 (typology F)	76,669 (typology E)	10,500
Land and buildings to the south east of Stockingswater Lane	14,175	32,999 (typology D)	80,735 (typology E)	25,375
Crown Road Lorry Park	4,530	8,213 (typology B)	8,213 (typology B)	4,495
Land and buildings north of Lincoln Road	3,310	10,937 (typology F)	26,328 (typology B)	Not stated
Claverings Industrial Estate	-580	3,219 (typology F)	3,219 (typology F)	Not stated
5 Picketts Lock Lane	-570	2,296 (typology F)	2,296 (typology F)	Not stated
6 Morson Road	2,600	2,600 (site too small for typologies)	2,600 (site too small for typologies)	Not stated
TOTAL	34,695	79,526	200,060	

- 3.30 The table above shows a significant variation in floorspace capacity depending on the approach taken. It was considered appropriate to consider the maximum intensification scenarios should be taken forward when assessing overall supply. This decision aligns with the positive framework for intensification set out in the emerging draft ELP. Additionally, through the site allocation process, further assurance can be obtained on the achievable floorspace on each site.
- 3.31 Collectively, the additional floorspace gained from extant planning consents and sites with potential totals 257,159 sqm. While this exceeds the Regulation 18 requirement of 251,505 sqm, it falls short of meeting the revised need figure of 304,000 sqm.

Meridian Water

- 3.32 A bespoke approach has been employed to calculate capacity for industrial sites at Meridian Water, aligning with the proposed Strategic Industrial Location (SIL) consolidation strategy intended to deliver industrial-led regeneration. This approach is comprehensively outlined in policies PL5 and E11 of the Regulation 19 draft Enfield Local Plan, with a summary provided in Chapter 7 of this paper.
- 3.33 In the context of establishing overall supply, the SIL consolidation strategy at Meridian Hinterlands is projected deliver a net additional 52,580 sqm of floorspace. This estimation factors in the replacement of the notional capacity of Harbet Road parcels proposed for SIL release (Parcel B and Parcel D).

Other sources of supply

- 3.34 The Core Strategy (2010) initially designated four retail parks in Enfield. However, the draft Enfield Local Plan proposed removing retail park status for all four sites, reflecting findings from Lichfield's (2021) 'Enfield Retail and Leisure Study: Updated Needs Assessment' which indicated negative demand for comparison retail over the plan period. Moreover, the wider policy environment encourages the reuse of out-of-centre retail locations for alternative uses, as outlined in London Plan Policy SD7, coupled with market interest in mixed use and industrial redevelopment.
- 3.35 Presently, the status of Enfield's retail parks is as follows:
- Ravenside Retail Park: promoted for logistics redevelopment by Prologis, with allocation in both the draft Regulation 18 and 19 iterations of the Enfield Local Plan.
 - Angel Road Retail Park: a very small retail park redesignated as a Mixed Use Employment Opportunity Area by the Edmonton Leaside Area Action Plan (ELAAP).
 - Colosseum Retail Park: granted outline consent for residential-led mixed use redevelopment.
 - De Mandeville Retail Park: acquired by British Land, owners of the adjacent Heritage House industrial intensification site.
 - Enfield Retail Park: The Morrisons supermarket portion has been promoted for mixed use redevelopment with allocation in both the draft Regulation 18 and 19 iterations of the Enfield Local Plan.
- 3.36 As a result, Enfield's retail parks have either a) granted planning consent for mixed use redevelopment, b) de-designated from retail park status and given an employment-led designation, or c) promoted and allocated for mixed use or industrial redevelopment.
- 3.37 The remaining sites comprising parts of De Mandeville and Enfield Retail Park have been given a 'Future SIL extension' status, acknowledging the policy and market shift away from out-of-centre retail. These sites are considered capable for redevelopment to meet existing and future needs of logistics and industrial occupiers.
- 3.38 The 2023 Employment Land Review estimates that these 'future SIL extension' sites could deliver approximately 108,070 sqm additional floorspace. However, as these sites were not actively promoted for redevelopment, they cannot be relied upon for floorspace delivery over the plan period. Nonetheless, the 'Future SIL' designation marks a future direction of travel for the evolution of Southbury.

Duty to Cooperate

- 3.39 As part of Duty to Cooperate (DtC) obligations, the Council engaged in discussions with neighbouring local authorities within the FEMA area to assess whether there was any potential of meeting Enfield's employment land needs beyond its boundaries.
- 3.40 Regrettably, these discussions have not been fruitful. Many DtC authorities encounter similar strategic challenges as Enfield, and most have limited capacity to meet their own needs, let alone others. DtC partners have formally indicated their inability to assist in fulfilling Enfield's employment need.
- 3.41 Despite the current impasse, the Council remains committed to continuing discussions and remains receptive to exploring potential for Enfield's employment land needs the cooperation of FEMA partners.

Green Belt sites

3.42 Taken together, the brownfield land supply is as follows:

Table 7: Brownfield Land Supply

Source	Net additional floorspace sqm
Extant planning consents	52,675
Potential supply	200,060
Meridian Hinterlands	52,580
Total	305,315

3.43 The total supply therefore slightly exceeds the identified need of 304,000sqm industry and logistics.

3.44 Nevertheless, there is also a qualitative dimension. As outlined above in the ‘potential supply’ section and in the updated market analysis in Chapter 4, the viability of intensification is uncertain. According to the NPPF glossary, for a site to be considered ‘deliverable’ it must be available now, offer a suitable location for development now, and be achievable with a realistic prospect of delivery within five years. At present, it remains unclear that these sites can be considered ‘deliverable’ in this strict sense.

3.45 Indeed, the 2023 Employment Land Review observes:

‘all of the typologies we tested will now be unviable ...There is no doubt that short-term and possibly medium to longer term, delivering additional industrial floorspace through redevelopment is very challenging.’

3.46 The larger ‘potential supply’ sites would need to come forward with the level of intensification envisaged to avoid a shortfall. Currently, they offer 200,060sqm of floorspace, all of which is crucial to ensuring the Council delivers its need. Moreover, Green Belt sites provide an early source of supply earlier in the plan period, particularly valuable given the uncertain prospects for intensification.

3.47 The NPPF states that Green Belt sites can be release under ‘exceptional circumstances’ (paragraph 144). These circumstances should be set out in strategic policies, demonstrating why normal planning policies are inadequate, and highlighting major changes in circumstances necessitating such measures. In this instance, Enfield faces a considerable shortfall in employment floorspace that it may not be able to deliver on existing sites alone, nor without development on Green Belt land.

3.48 In order to address the shortfall resulting from the limited capacity of intensification sites to deliver the full quantum of 200,060sqm, three Green Belt sites were proposed for allocation for industrial/ logistics purposes:

- Land West of Rammev Marsh;

- Land to the North West of Innova Park; and
- Land East of Junction 24.

Table 8: Green Belt sites proposed for industrial/logistics purposes

Site	Developable area sqm	35% plot ratio	65% plot ratio	95% plot ratio
Land West of Rammey Marsh	108,000	37,800	70,200	102,600
Land to the North West of Innova Park	25,300	8,855	16,445	24,035
Land East of Junction 24	47,000	16,450	30,550	44,650
TOTAL	180,330	63,105	117,195	171,285

3.49 Land West of Rammey Marsh and Land to the North West of Innova Park are located adjacent to existing SIL, within an established industrial district, that have ready access to the strategic road network. These sites have the potential to come forward early in the plan period.

3.50 Land East of Junction 24 of the M25, presents a more complex scenario. Situated in open countryside, it forms part of a wider site within Hertsmere District Council. Development of this site necessitates both portions of the wider cross-boundary area advancing simultaneously to optimise the employment offering and in the interest of good placemaking. For this reason, development of the site will be dependent on Hertsmere’s local plan timetable, and their willingness to countenance releasing their portion of the site from Green Belt designation. The Land East of Junction 24 is therefore considered to be a longer-term prospect.

3.51 Given these considerations, the Regulation 19 draft Enfield Local Plan proposes that industrial/ logistics needs can be met through a combination of brownfield sites and as a last resort, greenfield development.

Office

3.52 As set out in the 2023 Employment Land Review, Enfield is not a strategically significant office location. Indeed, the 2017 London Office Policy Review, prepared as part of the London Plan evidence base, observed that:

‘Enfield is a small and insignificant office market and we do not expect this to materially change.’ (p. 116).

3.53 The Call for Sites resulted only one notable proposal for new office development, with the promoters of Meridian Water proposing 100,000 sqm of office across Meridian West, the regeneration area situated west of the River Lee Navigation.

3.54 However, to prevent an oversupply scenario and mitigate the potential issues such as vacancy and unplanned changes of use, the boroughwide need figure of 40,000 sqm was used to allocate office capacity across Meridian Water.

3.55 The allocation of office capacity was guided by two key principles:

- The site promoter must have indicated willingness to consider office development as part of their Call for Sites submission, and
- The site under consideration must either wholly or partially be located within the indicative town centre of Meridian Water.

3.56 Consequently, the site allocations have been updated as follows:

- Meridian 13: 6,800 sqm;
- Tesco: 6,800 sqm;
- IKEA: 13,200 sqm; and
- Phase 2: 13,200 sqm.

4. Property Market Review

4.1 This section provides a summary of the property market review, which forms Chapter 5 of the 2023 Enfield Employment Land Review.

4.2 The commercial property market in Enfield has been influenced by several unusual and high impact events since the 2018 ELR prepared by AECOM, these include:

- The UK's departure from the EU introduced insecurity to property markets post Brexit vote. Despite this, the industrial and logistics market remained resilient, driven in part by the growth of e-commerce over the past 15 years. Enfield is a strong logistics position, especially in e-commerce, continued to drive development activity.
- The Covid-19 pandemic further increased demand for industrial-type premises due to the rise in e-commerce, coupled with a much slower than hoped high street (partial) re-opening continued to drive e-commerce demand and supply chain vulnerability leading to increased focus on reshoring. This resulted in a period of high occupier demand, limited supply and record rents in the logistics market. As a result of increased occupier demand, the investment market remained robust with demand high and compressed yields.

4.3 While the logistics sector experienced a boom, driving development and increasing property values, there are indications that this trend may be slowing down. Factors such as inflation and higher interest rates have made developers more reluctant to progress new opportunities, leading to a weakening of the pre-planning pipeline.

4.4 Broadly speaking, Enfield's industrial market can be characterised as:

- According to VOA⁶ data, the stock of industrial floorspace in 2022 was 1,195,000 sqm, representing a slight decrease of 2% compared to 1,221,000 sqm reported in 2017. This reduction is relatively small compared to other London boroughs. Indeed, the quantum of industrial floorspace in Enfield has fallen by only 14% since 2000/01.
- The available unit count has increased significantly by 125%, from 2022 to 2023. This increase in availability reflects a transition in the market from a period of rapid growth and buoyancy (where occupiers were rapidly securing additional industrial warehousing space due to the COVID-19 pandemic and the particular market forces at that time), to a slower growth phase influenced by wider economic climate. Larger units are more readily available than smaller, with 17 units between 2,000 to 10,000 sqm offering a total of 76,971 sqm of floorspace in 2023. In contrast, there were only four units under 250 sqm, providing a total of just 780 sqm of floorspace in the same year.

⁶ Valuation Office Agency, 'Non-Domestic Rating: Floorspace Tables 2021'

Unit Size (sqm)	Units	Floorspace (sqm)
Under 250	4	780
250 to 500	6	1972
500 to 1,000	11	7,932
1,000 to 2,000	7	9,560
2,000 to 10,000	17	76,971
Over 10,000	0	0
Total	45	97,215

Figure 5: LB Enfield Industrial stock availability by unit size, 2023

- 4.5 Enfield’s vacancy rate is 4.5%, slightly below the 4.9% ten-year average. These rates are broadly average for Outer London boroughs, but notably higher than in Inner London boroughs, where vacancy rates are typically very low.
- 4.6 Take up in Enfield has seen a reduction. Between August 2021 and August 2022, take-up amounted to 92,008 sq m. Comparatively, for the same time period between August 2022 and August 2023, take-up was substantially less at 11,566 sq m, equating to a year-on-year decrease of 87%. Economic uncertainties combined with the expansion during the bullish market driven by COVID-19, have led to slow take-up of logistics and industrial property as the uncertainty persists.
- 4.7 Rents in Enfield are estimated to average £13.60 per sq ft, with the ten-year average being £10 per sq ft. These rents are broadly comparable with those in the East London outer boroughs, but lower than boroughs in the other outer London sub-regions, and substantially lower than Inner London boroughs.
- 4.8 However, industrial rents vary widely within asset classes, and depending on the location, size and specifications of the unit in question. The table below summarises evidence from the ELR (2023).

Table 9: Summary of evidence from 2023 Employment Land Review

Format	Indicative size	2023 rents	Comments
Modern Detached Distribution Warehouse	c.100,000 plus sq ft	Headline rents of £20 per sq ft	There is strong market demand for this type of building in the study area due to its proximity to the M25 and other arterial routes, as well as its accessibility into central London. Rental demand for these premises has been strong over the past 24 months. However, more recently the market has experienced increased uncertainty due to the ongoing economic and political issues in the wider economy.
Modern Detached or Terraced Warehouse,	c.20,000 – 100,000 sq ft	£16 - £24 per sq ft	Parcel operators typically use these units in outer areas of London. This market had shown strength, with occupiers seeking larger buildings to improve their supply chain

Format	Indicative size	2023 rents	Comments
including older refurbished stock			efficiency. However, it is currently experiencing a state of flux.
Modern Terraced Warehouse, including older refurbished stock	Less than c.20,000 sq ft	£18 - £27 per sq ft	There is a good market for these types of units across both outer and inner London, typically occupied by local businesses and often serving as a complete business unit encompassing office, storage and distribution functions. Whilst there is demand for new space, there is also a strong market for second hand / refurbished including older generation buildings. The ability to refurbish and recycle existing stock, which offers cost efficiency, has historically been a barrier to redevelopment and intensification of such properties. The cost to benefit ratio of redeveloping to seek additional floorspace has not been sufficiently attractive.
Older Generation Warehouse Units	NA	£10 - £15 per sq ft	LB Enfield has retained a large supply of secondary and tertiary industrial stock, unlike many other boroughs where such floorspace has been lost to alternative uses. This retention is crucial because not all occupiers, especially local businesses, can afford new build property, nor do they need new build property. The range of occupiers is broad reflecting the varied profile of available stock.
Open Storage Sites	NA	£5 per sq ft +	Traditionally these sites have been as storage facilities for machinery, building materials, containers, bus depots and other vehicles, More recently, there has been a growing trend of using them for parking last mile delivery vehicles.

4.9 Whilst Enfield has a large and buoyant industrial market, the same is not true for the office sector. The profile set out below provides some key insight into Enfield's small office market:

- In 2022, Enfield's office market comprised 130,000 sq m of floorspace, marking a 22% decrease from 167,000 sqm in 2016/17. This decline is attributed to both a contracting office market and the consequences of Permitted Development (PD).
- The majority of Enfield's offices are smaller units, with over half being under 250 sq m in size.

- Rents were approximately £18 per sq ft in 2021, remaining around the 2016 level, although data volatility exists due to the limited transactions.
 - There was 29,107 sq m of available floorspace, resulting in a 22.4% availability rate.
- 4.10 Enfield lacks an established and sizable office market compared to other London boroughs. According to The Total Floorspace Table produced by the VOA, the borough's total office floorspace was 130,000 sq m in March 2022, declining steadily from a near high of 182,000 sq m in March 2020. Enfield's total office floorspace as of March 2022 ranked in the bottom 25% among London Boroughs. Overall, the ELR (2023) found that Enfield's consistent decline in office provision is unlikely to change in the near future due to a lack of amenities typically sought by office occupiers.

Viability of industrial intensification

- 4.11 Building on the intensification typology profiles outlined in the previous chapter, this section summarises the key findings from the 2023 ELR, comparing the prospects for intensification from 2021 to 2023.
- 4.12 Between 2021 to 2023, build costs increased more than anticipated, accompanied by a substantial increase in borrowing costs starting from a very low base in 2022/23. By 2023, rents had kept pace with the rising costs of development. From a 2023 perspective, short-term viability was challenged as build costs rose by more than 20%, rendering all originally tested typologies unviable, even for standard industrial warehouse schemes on a speculative basis.
- 4.13 However, the ELR (2023) anticipated a rebalancing of development viability over the mid to long term after 2023, as market fundamentals and demand were expected to remain strong. While there was no indication that the market will ultimately adjust, the duration required for values and build costs to align remained uncertain.
- 4.14 The conclusions of this work indicated:
- Highest values are secured for straightforward industrial space appealing to logistics firms, commanding a market premium. However, the inclusion of ramps or access to upper floors for intensified space reduces the quantum of ground floor lettable space.
 - Intensified formats often secure additional space on upper floors, but such space struggles with loading and specifications to meet even modest logistics operator requirements, leading to delivery of lighter specifications, or no delivery at all. As space intensifies vertically, build costs increase, while the value of the gained space diminishes. Including very light, office-like format space rendered the typologies unviable when tested.

5. Market engagement

- 5.1 Enfield Council organised an engagement session aimed at logistics stakeholders, in August 2023 to gain industry perspectives on key locational drivers for logistics development and to assess the strengths and drawbacks of Enfield as a location.
- 5.2 The primary objective of the session was to validate emerging insights from the employment evidence base, and to gain feedback on the emerging policy approach outlined in the Regulation 19 draft Enfield Local Plan.
- 5.3 In line with Planning Practice Guidance, which advises engaging with logistics developers and occupiers to understand evolving requirements, the session aimed to identify the scale of logistics needs across relevant market areas including 'engagement with logistics developers and occupiers to understand the changing nature of requirements in terms of the type, size and location of facilities, including the impact of new and emerging technologies.'
- 5.4 Fifteen stakeholders from a range of development industry backgrounds, participated in the interactive workshop, engaging in regular discussions throughout.
- 5.5 Key insights from the session include:
 - Consensus among participants on e-commerce, streaming (leading to demand for film and tv), and remote working, driving demand for warehouses and studios, while weakening demand for office, with Enfield's strategic location positioning it favourably to capitalise on logistics demand.
 - Underpinning this trend is the wider shift towards digitalisation across all spheres of life. This transformation encompasses the growing demand for data centres, an aspect that Enfield has not encountered to the same extent as other London boroughs, particularly those in west London.
 - Despite Enfield experiencing a lesser loss of stock compared to other London boroughs, the lack of supply poses a challenge, resulting in rising rents.
 - The current pipeline is notably constrained particularly for developing modern 'best in class' facilities. This situation has created a divergence in the market, with older spaces catering to a range of occupiers while newer sought-after spaces are in short supply.
 - The scarcity of supply has sparked increased interest in intensification as a compromise solution. However, while intensification seemed promising 18 months ago, it is now perceived as challenging. Margins for single storey development margins are currently tight, making the viability of intensified formats difficult.
 - An industrial developer noted that whilst they have pursued intensified formats outside of London, they have not done so within London so far. They see intensification as a 'compromise' due to current scarcity but anticipate future opportunities.
 - Participants appreciated Enfield's active interest in intensification, recognising the longer-term perspective as worthwhile. Many other London boroughs are also exploring intensification, with notable public sector-led initiatives like industrial schemes emerging.

- There was interest among participants regarding intensified schemes in Enfield, particularly following the recent planning consent for Heritage House in Southbury.
- Some participants shared positive experiences in bringing forward industrial schemes in Enfield.
- Regarding amenities and placemaking, developers have invested in a significant amount of work in understanding the needs and priorities of logistics occupiers.
 - Amenities and wellness, including access to lunch venues and green environments for relaxation, emerged as top priorities.
 - Developers are integrating these amenities from the outset with environmental, social and governance (ESG) considerations increasingly influencing the provision of new space. This aspect served as a positive distinguishing factor between new modern schemes and older style buildings.
- Proximity to residential areas was seen as a drawback, with complaints from residents potentially hindering industrial development potential adjacent to SIL. Buffering and mitigation strategies are needed to address this issue.

5.6 The session received positive feedback from participants, who welcomed Enfield's focus on logistics and its willingness to engage with stakeholders. The session prompted a number of follow-up discussions with individual participants.

6. Affordable workspace

6.1 The London Plan Policy E3 indicates that:

- Boroughs, in their Development Plans, should consider detailed affordable workspace policies in light of local evidence of need and viability. (Part C).
- Affordable workspace is defined as B use class space where ‘rents (are) maintained below the market rate for that space for a specific social, cultural or economic development purpose.’
- Supporting text 6.3.7 states that ‘The Mayor will encourage the delivery of new workspace for SMEs, the creative industries, artists and the fashion industry within new residential and mixed-use developments.’

6.2 The Employment Land Review (2023) sets out the need for affordable workspace in Enfield.

6.3 In summary the policy promotes a supply of new space, at rents below market rates, catering to specific social, cultural or economic development purposes. However, while the London Plan emphasises the availability of affordable workspace for specific sectors, defining these sectors can be broad since most new economic spaces inherently serve an economic development purpose.

6.4 A more pragmatic interpretation of the policy suggests an aim to a) support small micro firms struggling to afford commercial space on cost grounds, or b) to provide a type of subsidy for charitable or non-profit making activities.

6.5 It is clear from the London Plan that there are two main themes:

- A desire to support the creative industries through policy. Compared to other London boroughs, Enfield is not a location of choice for the creative industries, with only around 15% of its firms classified as creative enterprises.
- A desire to protect firms who struggle to access commercial space on cost grounds through policy. Evidence suggests that smaller firms in Enfield, particularly those needing industrial-type premises, face challenges in accessing commercial space. As is demonstrated in the ELR (2023) there is little to no small unit industrial supply, which represents a clear gap in the commercial market offer.

6.6 In the Enfield context, there is a case to support small industrial and manufacturing firms without the explicit need for a specific link to the creative sector. The ELR (2023) suggests that whilst an Enfield Affordable Workspace policy could focus on supporting the ‘creative sector,’ it could also extend support to small-scale industrial (manufacturing) firms to address economic development needs and market imbalances. This would include firms connected with the creative sector but would also extend to local Enfield businesses engaged in similar activities, using similar property, even if their end customers are not exclusively within the creative sector.

6.7 The ELR (2023) reviewed several different typologies of affordable employment workspace and found that a common factor among them is affordability, offering discounted products that deliver smaller units.

6.8 The Review advises that development partners should be engaged to shape individual proposals, ensuring that the space reflects the micro-market and needs of small firms in the borough at the time of any development proposal. However, a number of broad criteria should be prioritised:

- dedicated light vehicle parking;
- space for pallet loading / unloading – including access into and through the property to individual units;
- dedicated commercial refuse facilities;
- provision for 3 phase power, where practical;
- adequate ventilation and extraction for light industrial activity;
- ground floor loading suitable for small scale pallet and forklift operations in larger units (5kPa);
- light industrial floor to ceiling heights, ideally high enough to accommodate mezzanine floors if required; and
- goods lifts to ensure ongoing flexibility to any upper floor.

6.9 In addition, the ELR (2023) recommended that:

- Encouraging access to shared services and facilities to save costs and support networking;
- Agreeing on the appropriate level of fit-out with the relevant provider, with Category A as the default. The cost of fitting out should not be passed onto the tenants;
- Ensuring that units are capable of operating for 24 hours a day without restriction, where appropriate; and
- Discouraging the delivery of a traditional office format (E(g)(i)) where there is scope for a more industrial-type format.

6.10 In terms of quanta and discounts, the ELR (2023) recommends that Enfield should aim for a 10% of floorspace to be affordable (defined as 10% discount on market rates) in perpetuity on schemes delivering more than 1,000 sqm of net additional economic floorspace.

6.11 Recognising that on-site provision may pose operational and viability issues for developers of industrial schemes, offsite provision should be permitted as an option to optimise the employment capacities of their sites.

6.12 Given the challenging viability of intensified industrial schemes at the time of writing, the ELR's (2023) findings suggest that that any affordable workspace requirement should be subject to viability assessment.

6.13 In terms of 'priority sectors', it is too early to provide to identify them in Enfield. The forthcoming Inclusive Growth Strategy may outline a set of priority sectors, and consideration should be given to prioritising affordable space for these sectors as outlined in the forthcoming Enfield Inclusive Economy Strategy or any updating successor.

6.14 Whilst Enfield does not maintain a list of affordable workspace providers, the ELR (2023) indicates that this may be desirable but not essential. Developers seeking to engage with workspace providers may use those maintained by adjoining boroughs such as LB Haringey, as a starting point.

7. Meridian Hinterlands: approach to Harbet Road

Background

7.1 Harbet Road is an 18.2ha former industrial site, currently designated as Strategic Industrial Land (SIL). Situated within the Meridian Water Regeneration area, it lies east of the River Lee Navigation, west of Harbet Road and Edmonton Marshes, and south of the North Circular Road. It is part of the Edmonton Leaside Area Action Plan (ELAAP) area.

7.2 According to the 2006 Employment Land Review (ELR), Harbet Road accounted for 4.8% of Enfield's employment land, or 17% of employment land within the ELAAP area. The review highlighted that Harbet Road encompassed Stonehill Business Park, Hastingwood and Lee Valley Trading Estates, and Edmonton Wharf, noting that the stock was generally adequate, in good order and meeting market requirements.' The site was not considered suitable for planning change of use, with the 2006 ELR recommending strongly opposition to any proposed changes.

7.3 By 2012, a later iteration of the ELR proposed Harbet Road for 'Managed release, reconfiguration and development for new employment space.' This recommendation was based on the need to balance providing employment space with the opportunity to develop new homes. The report highlighted:

'estimating market demand for space in this area is difficult. The policy context is well publicised so no occupier seeking long term space would commit to the area nor would the owners be willing to invest significantly in improving the stock.'

7.4 In contrast, the 2010 Core Strategy, designated Harbet Road as SIL, specifically identifying it as a Preferred Industrial Location (PIL).⁷

7.5 The 2018 ELR (largely concluded in 2016) assessed the site's condition, noting that much of the site consisted of vacant and cleared land. Remaining premises included small warehouse and manufacturing spaces, workshops, yard storage and a bus depot. The report highlighted that the overall environment and premises were of poor quality, with the exception of the Hastingwood Trading Estate sub-area, which was in good condition.'

7.6 The recommendation (at the time) was to retain the site for industrial use, albeit not in its entirety. It proposed:

'part of the cluster – areas south away from direct access to the strategic road network (and the adverse effects that the A406 generates) - may be suitable for mixed use redevelopment if that were to support B-use class employment.'

7.7 The report highlighted the site's significant for intensification.

7.8 Concurrently, with the development of evidence base and policy, the site promoter formulated plans for a comprehensive mixed use redevelopment. Various iterations of masterplans were prepared over a number of years. Figure 6 shows an extract from the 2013 masterplan for Harbet Road.

⁷ PIL designation related to the 2016 London Plan approach of dividing SIL sites into 'Industrial Business Parks' and 'Preferred Industrial Locations.' (See 2016 London Plan, para 2.79). This distinction was not carried forward into later iterations of the London Plan.



Figure 6: Meridian Water masterplan July 2013

Edmonton Leaside Area Action Plan (ELAAP)

7.9 The ELAAP, adopted January 2020, aimed to deliver substantial connectivity and placemaking enhancements to the Edmonton Leaside area, including the creation of 5,000 new homes and 1,500 additional jobs. The plan aimed to foster greater economic diversity within Meridian Water.

7.10 In terms of spatial planning, the ELAAP initially proposed the removal of Harbet Road's SIL designation. In its place, the plan proposed new SIL designations including Deephams Sewage Treatment Works as well as several smaller parcels.

7.11 However, the Inspector found that the proposed SIL strategy would not align with the requirements of the London Plan. The Inspector noted that:

'Whilst a de-designation of land as SIL would provide the opportunity to introduce higher density employment uses to Meridian Water, there is limited cogent evidence to support the view that existing SIL designations are no longer fulfilling a functional employment need for industry and that any identified need could be adequately accommodated within the other designations proposed.' (Paragraph 27).

7.12 As a result, the ELAAP retained Harbet Road's SIL designation. Despite recognising that Deephams Sewage Treatment Works was essential for ongoing operational requirements and would not contribute additional industrial capacity during the ELAAP's plan period, it was also given SIL status.

7.13 Following the Examination in Public (EiP), the local planning authority and the Greater London Authority (GLA) entered into a Statement of Common Ground (SofCG) on 27th March 2019).⁸ The SofCG indicated that the Mayor of London was fully supportive of the ELAAP's policies and approaches. One aspect of the agreement was the commitment not to pursue the release of SIL part of the ELAAP. This SofCOG replaced an earlier version from 24th October 2018) which highlighted disagreement regarding the approach taken to the de-designation of SIL.⁹

7.14 An earlier version of the SofCG, which remained unsigned, alluded to discussions between the GLA and LBE for a more nuanced approach. This approach suggested that land south of the 'Causeway' (the central spine route) might be more suitable for de-designation compared to the northern portion, which had convenient access to the North Circular Road.¹⁰

Changes since ELAAP

7.15 Since the adoption of ELAAP significant shifts have occurred in the policy environment, as well as in commercial real estate markets.

7.16 Changes in the wider economy have led to rising demand for industrial land. According to the London Industrial Land Supply Study (published 2023), the vacancy rate for core industrial space has halved over the past five years, indicating a rising demand.

7.17 At a boroughwide level, demand for land for industrial and logistics land has shown consistent growth. The 2006 ELR estimated demand at 28ha, which rose to 30ha by 2012, driven by increased logistics demand. By the the 2018 ELR, demand had increased to 46.8ha. The 2023 ELR further found that demand had increased again (see Chapter 1).

7.18 In the three years following ELAAP, demand has remained strong, suggesting the imperative to plan for additional employment floorspace rather than countenance any reduction in capacity.

7.19 Moreover, there has also been greater clarity regarding the means to address these needs. The 2021 London Plan embeds a supportive policy approach on intensification.

⁸ https://www.enfield.gov.uk/data/assets/pdf_file/0028/5689/exd116-post-eip-socg-enfield-council-and-gla-planning.pdf

⁹ https://www.enfield.gov.uk/data/assets/pdf_file/0019/3880/exd82-socg-enfield-and-gla-planning.pdf

¹⁰ https://www.enfield.gov.uk/data/assets/pdf_file/0010/4240/exd57-socg-lbe-gla-final-draft-planning.pdf

Coupled with the prohibition on Green Belt development, intensification is the primary avenue for providing new employment floorspace.

7.20 In summary, Policy E7 of the 2021 London Plan:

- Supports a proactive and encouraging approach to intensification of B1c, B2 and B8 uses (part A)
- Permits SIL and LSIS consolidation 'to support the delivery of residential and other uses, such as social infrastructure, or to contribute to town centre renewal' (Part B), subject to the following (set out in Part D):
 - Must not compromise the function of surrounding industrial;
 - Intensified premises must be completed in advance of any residential occupation; and
 - Appropriate design mitigation is provided in any residential element.

Emerging Enfield Local Plan – Regulation 18: Main Issues and Preferred Approaches (2021)

7.21 As part of the preparations for Regulation 18, the LPA commissioned a range of evidence on the prospects for intensification in the borough. The studies prepared by AECOM and Avison Young (2020) and Stantec and Grant Mills Wood (2021) are available on the council's website.

7.22 Harbet Road in particular, emerged as a site with high potential for intensification. Figure 7 below shows the outcome of the study, with green denoting the highest suitability for intensification.



Figure 7: From AECOM and AY (2020) Enfield Intensification Study

7.23 In the Call for Sites submission received from the site promoter in 2020, their aspiration for comprehensive mixed-use redevelopment at Harbet Road was reiterated.

7.24 However, it was decided not to allocate the site for mixed use due to the difficulty in justifying the de-designation in 2021, for the following reasons:

- The Borough has an identified net need for industry and logistics floorspace;
- The proposed redevelopment would result in the net loss of employment floorspace; and
- The site is currently unavailable and not expected to be so for another 15 years.

7.25 Considering the site owners' aspiration for non-SIL compliant uses, and their lack of appetite for intensification, the site was not allocated for any specific uses or associated floorspace quota.

Changes since 2021

7.26 Since the Regulation 18 consultation in 2021, the evidence base underpinning the draft Local Plan's approach to employment has been further developed.

- The identified ‘need’ for industry and employment increased to 304,000 sqm for the plan period between 2019-2041 (see Chapter 2 of this topic paper for more details).
- However, the deliverability of intensified premises has weakened. The 2023 Employment Land Review noted that:

‘all of the typologies we tested will now be unviable ... There is no doubt that short-term and possibly medium to longer term, delivering additional industrial floorspace through redevelopment is very challenging.’

7.27 During the Regulation 18 consultation, the GLA provided detailed feedback on the approach to Harbet Road, stating that:

‘Local Plan evidence from the two previously cited pieces of Local Plan evidence both indicate that Meridian Water, East Bank (Harbet Road) (Sites ST77 and ST92 in the studies) offer the greatest potential for industrial intensification. In fact, this area alone offers 67.4% of the borough’s total industrial intensification potential. These sites have not been allocated for the intensification of industrial uses in the draft Plan. The Enfield Employment Topic Paper (June 2021) at paragraph 3.35 makes it clear that there is no prospect of the landowners of these sites implementing the recommendations of the evidence work and the sites have therefore been left out. Inclusion of these sites alone would account for much of Enfield’s industrial land needs over the course of the Plan and it is the Mayor’s opinion that their inclusion for industrial intensification should be reconsidered.’

7.28 Repeated engagement with the landowner immediately following the Regulation 18 consultation in 2021 revealed a lack of willingness to consider industrial-led redevelopment in general, and industrial intensification in particular. Consultants reiterated advice to the council that relying on this potential to deliver intensified space in the draft Enfield Local Plan would be unsound. They also advised against considering ST77 and the smaller ST92 as contributors to helping to meet industrial/logistics needs through intensification.

7.29 However, in 2022, negotiations with the landowner show progress. Instead of SIL loss, SIL consolidation was proposed as a means to deliver industrial-led regeneration, including the provision of new homes alongside an increase in employment floorspace.

7.30 In July 2022, the landowner submitted a Call for Sites proposal reflecting these revised aspirations. The submission indicated that new industrial floorspace could be delivered alongside residential development and supporting infrastructure.

Enfield Local Plan – Regulation 19 approach

7.31 Policy PL5 of the draft Enfield Local Plan sets out the overarching strategic approach to Meridian Water in its entirety. The policy articulates an aspiration to:

‘deliver employment-led regeneration at Meridian Hinterlands.¹¹ Deliver a net increase in employment floorspace through intensification and mixed use redevelopment. Consolidate SIL to deliver new homes and jobs and successfully manage interfaces to ensure that businesses can thrive.’

¹¹ Meridian Hinterlands relates to the elements of Meridian Water Regeneration Area outside the core town centre area, close to the station (known as Meridian West). Meridian Hinterlands also known as Harbet Road, and ‘Meridian East’ including: Ravenside Retail Park and Kenninghall Metals and Waste

7.32 Policy E11 of the draft Enfield Local Plan outlines a comprehensive strategy to facilitate industrial-led regeneration through the following mechanisms:

- Implementation of ambitious industrial intensification at Parcel A, which will be retained as SIL;
- Construction of a Park Link Route (consented under application 19/02717/RE3) and associated mixed use development at Parcel B, with the intention to remove its SIL designation;
- Introduction of new intensified development at Parcel C, to be retained as SIL; and
- Preparation of a masterplan to manage the transition of Parcel D from SIL to LSIS designation.

7.33 Figure 8 below sets out the location and boundaries of these parcels.

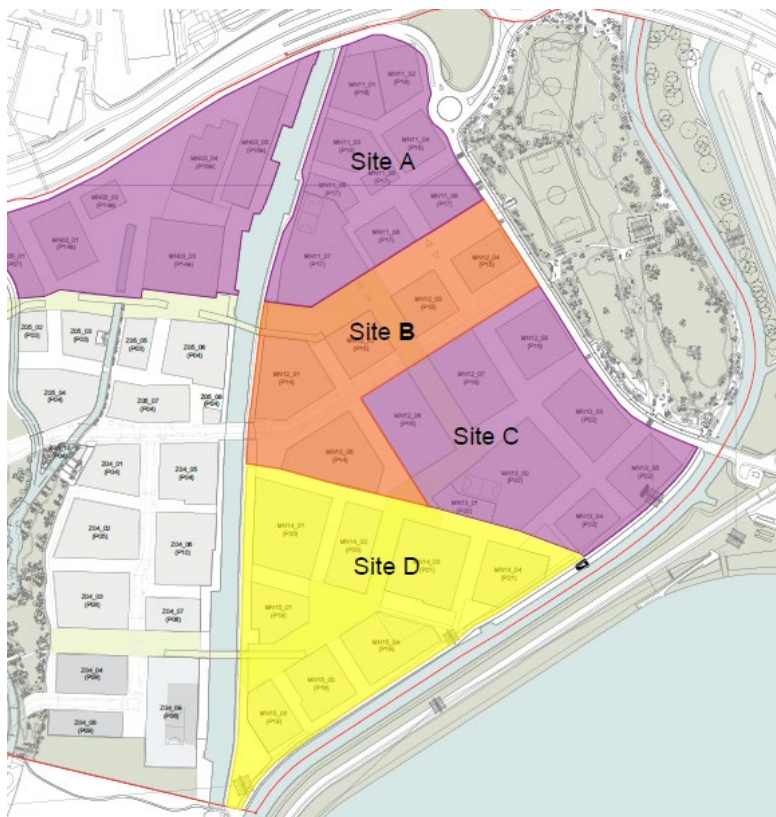


Figure 8: Harbet Road parcels

7.34 In summary, the industrial-led regeneration approach outlined within the Regulation 19 draft Enfield Local Plan for Harbet Road will result in the following outcomes:

- A net increase in employment floorspace totalling 125,430 sqm;
- Approximately 2,095 new homes;
- Gain in LSIS of 2.4ha; and
- A minor reduction in SIL of 2.54ha from a total of 331ha.

8. Employment designations

Policy context

- 8.1 The London Plan sets a framework for designating employment land in London, categorising land and premises for industry, logistics and services into three main categories:
- Strategic Industrial Locations (SIL);
 - Locally Significant Industrial Sites (LSIS); and
 - Non-Designated Industrial Sites.
- 8.2 This framework provides the basic used in the draft ELP to categorise the borough's stock of industrial and logistics land, including sites relied upon for future supply.
- 8.3 The London Plan does not explicitly define the key characteristics of SIL, but provides some broad qualities in supporting text 6.5.1 and 6.5.2. In summary, SILs:
- Serve as London's main reservoir of land for industrial, logistics and related uses.
 - Receive strategic protection due to their critical role in the functioning of London's economy;
 - Can accommodate activities which by virtue of their scale, noise, odours, dust, emissions, hours of operation and/or vehicular movements can create tensions with other land uses, particularly residential development;
 - Support strategic logistics operations for the capital and provide relatively low-cost industrial space for SMEs;
 - Typically located close to the strategic road network and may have access to rail, river, canals and safeguarded wharves for the sustainable movement of goods, construction materials and waste to, from and within London.
- 8.4 LSIS have a specific local importance for industrial and related functions as outlined in supporting text 6.6.1. In summary, LSIS:
- are locations which have particular local importance for industrial and related functions;
 - complement provision in SILs;
 - Inner London LSIS may focus on providing sustainable distribution services for key areas like the Central Activities Zone and Northern Isle of Dogs.
- 8.5 Non-designated sites are those not subject to SIL or LSIS designation in a Local Plan, as per Policy E4 of the London Plan.
- 8.6 Additionally, the ELAAP designates one site as a 'Mixed Use Employment Opportunity Area.'¹² This designation aims to transition previous retail park use to a mixed-use

¹² Angel Road Retail Park Site, north of the North Circular Road on the edge of the Meridian Water regeneration area.

employment-led approach, supporting the nearby SILs like the Eleys' Estate and facilitating greater integration with neighbouring industrial activities.

Enfield's Local Plan – Regulation 19 approach

8.7 As part of the Regulation 19 plan, existing industrial locations and proposed new employment sites underwent review by Stantec and GMW to assess their suitability for SIL/ LSIS/ undesignated status.

8.8 Factors considered were taken into consideration:

- Location: access to the strategic road network or rail/ river freight without significant constraints;
- Absence of constraints, such as nearby sensitive uses or heritage/ urban design restrictions
- Capacity to meet strategic needs.

8.9 An 'typical' SIL candidate site would be large and uncomplicated, offering opportunities to meet market demand effectively.

8.10 Factors considered in assessing suitability for LSIS included:

- proximity to sensitive uses; and
- capacity to meet locally-oriented or supporting needs within a mixed use context.

8.11 The 'typical' LSIS site would be situated within a mixed-use context, serving as an employment hub embedded integrated with a range of different uses and activities.

8.12 Proposed employment designations outlined in the Regulation 19 ELP are as follows:

Table 10: Proposed employment designations

Cluster	Site	Proposed designation	Size in ha if newly designated
Brimsdown Part B SIL	Land to the South of Millmarsh Lane	Existing SIL	N/A
Brimsdown Part B SIL	Land and Buildings South East of Stockingswater Lane	Existing SIL	N/A
None	Beavertown Brewery	New SIL	2.66ha
Meridian Business Park SIL	6 Morson Road	Existing SIL	N/A

Cluster	Site	Proposed designation	Size in ha if newly designated
Great Cambridge Road Part A SIL	Heritage House	Existing SIL	N/A
Great Cambridge Road Part A SIL	Crown Road Lorry Park	Existing SIL	N/A
Great Cambridge Road including Martinbridge Trading Estate Part B	Land to the north of Lincoln Road	Existing SIL	N/A
Montagu Industrial Area North SIL	Montagu Industrial Estate	Existing SIL	N/A
Angel Road MUEOA	Angel Road	MUEOA to SIL	2.2ha
Montagu Industrial South LSIS	Montagu Industrial South LSIS (AKA Kenninghall)	LSIS to SIL	Northern section – 1.73ha Southern section – 3.45ha. Total = 5.18ha
Claverings Industrial Estate LSIS	Claverings Industrial Estate	Existing LSIS	N/A
Picketts Lock Wholesale (undesigned)	5 Picketts Lock Lane	New LSIS	1.82ha
Wharf Road Industrial Estate (undesigned)	Wharf Road Industrial Estate	New LSIS	0.6ha
Ravenside Retail Park (undesigned)	Ravenside Retail Park	New SIL	3.3ha
Land W of Rammey Marsh (undesigned)	Land W of Rammey Marsh	New SIL	12ha
Land East of Junction 24 (undesigned)	Land East of Junction 24	New SIL	10.8

Cluster	Site	Proposed designation	Size in ha if newly designated
Land to the North West of Innova Park (undesignated)	Land to the North West of Innova Park	New SIL	3.2
Harbet Road SIL	Harbet Road/ 'Meridian East'	SIL consolidation	-9.9 net
Harbet Road SIL	Harbet Road/ 'Meridian East'	SIL to LSIS	5.8

Outcomes

8.13 The proposed designations will lead to the following net area gains:

- An increase of 29.44ha SIL
- An increase of 3.04ha LSIS

8.14 Much of the newly designated SIL is located close to existing SIL, thereby offering much needed additional capacity within the Lee Valley industrial corridor. This will enhance agglomeration advantages for industrial and logistics businesses.

8.15 The modest increase in LSIS is largely due to employment-led regeneration at Meridian East. This initiative will provide employment floorspace as part of mixed-use proposals, contributing to job creation and services for a growing new community.

9. Summary and Conclusion

- 9.1 As set out in the Employment Land Review prepared by Stantec, Enfield has the following employment needs for the period 2019-2041:
- Industrial: 304,000sqm;
 - Office: 40,000sqm.
- 9.2 The existing supply of office land matches this demand, with development at Meridian Water anticipated to fulfil the requirement entirely. However, the industrial supply, presents a more nuanced situation.
- 9.3 There are extant permissions for a net additional 52,675sqm, with a further 52,580sqm expected to be delivered as through the Meridian Water redevelopment. This totals 105,255sqm, leaving a shortfall of 198,745 sqm.
- 9.4 The draft Plan suggests a potential increase of 200,060sqm on existing employment land through intensification. However, as outlined in the ELR, this outcome is uncertain. Stantec's report suggests a more achievable uplift of 74,189sqm. If this figure was carried forward, the total net increase in floorspace across the borough would be 179,444 sqm, leaving a shortfall of 124,556sqm that needs addressing.
- 9.5 Currently, it seems challenging to address the shortfall over the Plan period without releasing Green Belt land. Assuming a plot ratio of 65% across the three Green Belt sites, there is the potential to deliver 117,195sqm, thereby reducing the shortfall to 7,362sqm.

Source of supply	Net increase in floorspace (sqm)
Total need	304,000
Established Supply	179,444
<i>(i) Extant permissions</i>	<i>52,675</i>
<i>(ii) Meridian Water</i>	<i>52,580</i>
<i>(iii) Intensification</i>	<i>74,189</i>
Green Belt (65%) ratio	117,195
Shortfall (excl. Green Belt)	124,556
Shortfall (inc. Green Belt)	7,362

Table 11: Sources of supply

- 9.6 Given the circumstances, it is therefore likely that the Council will have to promote the identification of new employment land and support significant levels of intensification to meet its employment requirements over the period covered by the emerging plan.
- 9.7 Relying solely on one approach, whether it be intensification or the identification of new land, will likely fall short of meeting the Borough's needs. A balanced strategy that incorporates both approaches will be necessary to adequately address Enfield's employment needs.