



Enfield Local Plan (Regulation 24) 2024 - Examination in Public

Statement of Common Ground

Between

London Borough of Enfield

And

Greater London Authority

Dated 1 November 2024

1. Parties

1.1 This Statement of Common Ground (SoCG) is agreed between the following parties to assist in the Examination of Public of the Enfield Local Plan (ELP):

- The Mayor of London / Greater London Authority (GLA); and
- The London Borough of Enfield (LBE).

2. Context / Need for a Statement of Common Ground

2.1 The GLA submitted representations on the Regulation 19 Consultation on the Pre-Publication Enfield Local Plan: 2019-2041, raising several concerns. These related to alignment with the Mayor's Good Growth objectives, particularly around building strong and inclusive communities, creating a healthy city, Green Belt release, affordable housing provision, housing target calculations, accommodation for Gypsies and Travellers, tall buildings policy, industrial land capacities, sustainable transport, and Green Belt sites.

2.2 This SoCG addresses these matters to the extent that both parties are able to at this stage. The GLA has identified two specific areas that are not considered to be in general conformity with the London Plan:

A) Tall Buildings Policy: The GLA expressed concerns that the current drafting of the Tall Buildings Policy includes exceptions that simply describes the planning system as a whole when determining planning applications. By including this statement within the tall buildings policy, but not others, creates the perception of a point of difference in how this is applied where there is an 'in principle' objection against one element of the Development Plan.

B) Green Belt Release: The GLA highlights that the borough must demonstrate exceptional circumstances to justify Green Belt release for housing and industrial sites. In light of emerging national policy, and the acute housing challenges in London, the GLA also notes that in order to meet 80,693 homes per year any Green Belt release needs to be optimised and aligned with good public transport accessibility in order that higher densities and sustainable development can be achieved. The GLA does not believe the sites identified at Crews Hill and, as per the current proposals, Chase Park achieve this due to poor public transport accessibility.

2.3 In response to **A**: the Borough has agreed to make modifications to try and address the GLA's concerns regarding the Tall Buildings policy. However, the GLA are of the view the modifications do not resolve the objection. LBE will continue to engage collaboratively to explore any further adjustments that might address these concerns and work toward alignment on this matter.

2.4 In response to **B**: the Borough understands that this objection can only be fully addressed by clearly establishing the necessary exceptional circumstances.

3. Changes since the Regulation 19 Representation

3.1 Both the GLA and the Borough acknowledge the national 'direction of travel' toward boosting the delivery of new homes.

- 3.2 The application of paragraph 4.1.11 of the London Plan, which the GLA considers the Borough did not apply in relation to its housing target, may not fully support this objective in its current form.
- 3.3 It is recognised that the Government is proposing to delete the reference in paragraph 61 of the NPPF that allows for the calculation of housing need using alternative methods where exceptional circumstances exist, an approach that has applied in London historically including the current London Plan. The London Plan was based on an alternative assessment of housing need that estimated a need for approximately 66,000 homes a year (2017 SHMA). However, the GLA and Borough note that this should be 80,693 should the September 2024 NPPF consultation progress; and if carried forward into a new NPPF, the net iteration of the London Plan will need to plan for 80,693 homes per year.
- 3.4 As such, Enfield's housing target is more likely to increase than decrease and for this reason the GLA are now advising boroughs to roll over their current housing target rather than apply the approach set out in paragraph 4.1.11 of the London Plan.
- 3.5 Additionally, the GLA and Borough acknowledge that national policy has been moving toward a different approach on Green Belt land, including the potential role of 'grey belt' in meeting housing needs. The next London Plan will need to be prepared in this context.
- 3.6 It is the shared position of the GLA and LBE that the release of Green Belt in the ELP requires exceptional circumstances to be demonstrated.

Chase Park and Crews Hill

- 3.7 It is a matter of difference between the parties that the GLA does not currently support the proposed Green Belt release at Crews Hill or Chase Park.
- 3.8 It is the GLA's position that any release of Green Belt must be in locations with good public transport accessibility, with a 'turn up and go' service as a minimum. This is required to secure sustainable densities which does not result in a disproportionate amount of development potential given to private vehicles use.
- 3.9 In the case of Crews Hill, the GLA does not believe the local station provides a public transport service that would support a sustainable neighbourhood.
- 3.10 In the case of Chase Park, the GLA notes that the land currently identified is too distant from the good public transport accessibility provided by the Piccadilly Line stations at Oakwood and Cockfosters to support a sustainable neighbourhood.
- 3.11 The GLA would be happy to work with LBE to develop alternative proposals that could take advantage of the existing infrastructure and service levels.
- 3.12 In light of recent proposed changes to national policy, the GLA remains concerned that the LBE proposals in the Green Belt represent a lack of optimisation of Green Belt land linked to the lack of public transport. The GLA considers that this will almost inevitably lead to low density, car dependent development that goes against the principles of sustainable locations in the emerging national policy on utilisation of 'grey belt' or 'previously developed land' and entail much greater loss of Green Belt land than would otherwise be necessary.

- 3.13 The Borough considers that both locations can be, or are, sustainable locations to accommodate growth and, while LBE welcomes the support of the GLA to take advantage of existing infrastructure and service levels to develop alternative proposals.
- 3.14 By way of context, the proposed standard method consultation figure for Enfield is 2,531 homes per year. This figure represents a 41 decrease from the previous estimate of 4,286 home per year. The London Plan's 'roll on' target for Enfield is 1,246 dpa. The draft ELP, as submitted, plans for 1,490 dpa.

4. Land Supply

Small Sites

GLA Comment

- 4.1 LBE should include its small site target in the draft Plan.

LBE Response

- 4.2 The Borough has updated its small sites monitoring and can now demonstrate compliance with the London Plan Small Sites target of 353 dpa.
- 4.3 LBE commits to compliance with its small sites target in line with the London Plan.

Matter(s) in Agreement or Disagreement

None.

Backlog

- 4.4 At the time of submission, the ELP acknowledged a housing delivery backlog of approximately 1,500 homes over the past three years. Initially, this shortfall was planned to be addressed within a seven-year period, by using a variant of the Sedgefield Method to clear the shortfall by 2028/29, aligning with the London Plan period. However, the backlog has since risen to 2,500 homes.
- 4.5 LBE has proposed to reflect the impact of these adjustments in updates to the ELP's land supply and will be referenced in response to the Inspector's Preliminary Question (PQ) 49.

Matter(s) in Agreement or Disagreement

- 4.6 This needs further discussion with the GLA.

5. Affordable Housing

- 5.1 The Mayor welcomes LBE's proposed strategic target that 50% of all new homes should be affordable, in line with London Plan Policy H4. Part 6 of Policy H2 in the draft ELP also aligns with London Plan Policy H5, which is similarly welcomed.

Affordable housing thresholds

GLA comment

- 5.2 The affordable housing thresholds as set out in the LP2021 are not minimum requirements for affordable housing; and as such should not be treated as targets but instead represent the level above which viability assessments are not required in accordance with the fast-track approach. By treating the thresholds as targets it could appear that where development proposals do not meet them, this indicates of itself grounds for refusal of planning permission and this is not the intention of the Mayor's threshold approach. To make the correct approach clearer Paragraph 8.20 should be amended.

LBE Response

- 5.3 LBE is open to considering minor rewording of the explanatory text in Paragraphs 8.20 and 8.21 to clarify our affordable housing objectives. Our aim is to ensure these sections clearly reflect our commitment to delivering affordable housing while aligning with the overall objectives of the Local Plan. We also want to ensure the text is accessible and easily understood by all stakeholders.

Matter(s) in Agreement or Disagreement

- 5.4 Both the GLA and LBE will review and consider minor revisions to Paragraphs 8.20 and 8.21 to improve clarity around affordable housing thresholds. This will ensure that the ELP's objectives are clearly communicated and aligned with local and regional housing priorities. These modifications will be submitted to the Inspector in LBE's response to PQ22.

Tenure split

GLA comment

- 5.5 Part 3 of Policy H2 sets a 50/50 tenure split for social and intermediate affordable housing. This approach is in line with LP2021 Policy H6 which requires a minimum of 30 per cent for each tenure type with the remaining 40 per cent to be determined by the borough based on local evidence. Paragraph 4.6.2 of the LP2021 sets out a presumption that the 40 per cent will be used for Social and London Affordable Rent, given the London wide need for this tenure type. It would be helpful for LBE to be clear how they have arrived at a 50/50 split by referring to evidence that justifies it.

LBE Response

- 5.6 Paragraph 8.22 of the ELP references the 2020 Enfield Local Housing Needs Assessment (LHNA) as the supporting evidence for the 50/50 tenure split. The Council believes this reference provides sufficient context, as the LHNA comprehensively addresses the borough's housing needs. Therefore, no additional references are considered necessary at this time.

Matter(s) of Agreement or Disagreement

- 5.7 LBE and GLA agree that the explanation is sufficient and no further action is required.

6. Gypsies and Travellers

- 6.1 The GLA welcomes Policy H10 of the draft ELP which acknowledges the need to deliver 21 new pitches for Gypsies and Travellers over the life of the Plan. However, the GLA requests further detail within Policy H10 to clarify how this need will be met.

GLA comment

- 6.2 Policy H10 currently does not identify specific sites capable of meeting the need for 21 pitches. LBE needs to ensure that provision for Gypsies and Travellers is made alongside other housing needs in the Plan.

LBE Response

- 6.3 The LBE is currently in the process of preparing a separate Traveller Local Plan (TLP). A second Regulation 18 consultation, which includes proposed site allocations, is underway.
- 6.4 For information, LBE has considered the emerging London-wide Gypsy and Traveller Accommodation Assessment (GTAA) and has updated its own assessment of need to 30 pitches, as set out in Enfield's GTANA 2024 update¹.

Matter(s) of Agreement or Disagreement

- 6.5 None at this stage, as the TLP is currently at the Regulation 18 consultation stage.

7. Tall Buildings

- 7.1 The GLA acknowledges that the draft Enfield Local Plan (ELP) identifies 58 individual locations deemed suitable for tall buildings, with each location assigned a potentially appropriate height that complies with London Plan 2021 Policy D9, Part B2. However, a few issues have been raised, which are summarised below:

Clarity of Definitions of Tall Buildings

GLA comment

- 7.2 The draft ELP sets several different definitions of what constitutes a tall building in different parts of the borough. The vast majority of the borough is covered by the definition of '(including roof plant) 21m and above'. For clarity and consistency, the definition should be clear about where the measurement begins and should be included in the definition. There are seven further, small areas where different tall building definitions apply. The height definition across these areas varies from 30m to 36m. There is no explanation provided in the draft ELP as to why each of these areas requires a separate definition and this would be useful to underpin the proposed approach and identify the harm that would arise should development within these areas exceed the stated height.

LBE Response

¹ https://www.enfield.gov.uk/_data/assets/pdf_file/0026/63944/Enfield-gypsy-and-traveller-and-travelling-showperson-accommodation-assessment-May-2024-Planning.pdf

- 7.3 To improve clarity, LBE will include minor modification reference to the Character of Growth Report, specifically Section 4.02-4.04., in Paragraph 7.42 of the ELP. This will provide a transparent understanding of the methodology used in assessing the character of growth. Detailed testing for each tall building zone is available in the Character of Growth appendices, ensuring that the rationale behind different height definitions is clearly communicated.
- 7.4 LBE will also include a minor modification adding an additional paragraph (7.43) explaining how the local definition were created.
- 7.5 In response to the GLA's comment requesting clarity on where height is measured from (AOD or ground level) a minor modification will be made to Paragraph 7.42 to clarify that height measurements are taken from ground level, which is set out in section 4.02-4.04 of the Character of Growth Study [DES1-43]. Consequently, paragraph 7.42 of the ELP, will read as follows:

The London Plan describes a tall building as those which are “taller than their surroundings and cause a significant change to the skyline” and that the definition “should not be less than 6 storeys or 18 metres measured from ground to the floor level of the uppermost storey” this is understood to mean a 21m absolute threshold from ground level to roof level. Part A of Policy D9 of the London Plan requires borough to define a local threshold where appropriate. These contextual definitions are shown in Figure 7.3. All height definitions and potentially appropriate heights are measured from ground level.

Matter(s) of Agreement or Disagreement

- 7.6 LBE and the GLA agree that the above response from LBE is sufficient to resolve the GLA comment.

The use of the term ‘Maximum’ rather than ‘Appropriate’ Building Heights – site allocations

GLA comment

- 7.7 The site allocations set maximum building heights. This is not considered to be consistent with Policy D9 of the LP2021, which states that any such locations and appropriate building heights should be identified on maps in Development Plans. This implies some flexibility which could include a range of ‘appropriate building heights’. This enables the tallest buildings in particular parts of a tall building zone and potentially lower building heights as the context and townscape indicates.

LBE Response

- 7.8 Only eight site allocations set maximum building heights. These are: SA.5.4, SA.6.1, SA.7.1, SA.2.1, SA.4.3, SA.2.3, SA.2.4, SA.4.2.
- 7.9 Maximums, applied using the phrase “must” are applied where site specific constraints require a clearly defined height ceiling that has been determined via the application process (for example, impact on heritage at Southgate Office Village, 6.1) or an adopted planning document (Meridian Water SPD) or the relationship with a planning application (SA.4.3, Langhedge Lane, which should be subsidiary to the development to the north).

- 7.10 All other allocations use “should” terms such as “should locate tall buildings of no more than 57m in the north of the site to mark the train station and the junction of the new north-south and east west routes.”
- 7.11 Appendix D3 presents tall building areas in map format as “Potentially appropriate location for tall buildings”. A borough wide version is visible on figure 7.4. The ELP offers clear guidance in Appendix D, emphasising that building height considerations must be context specific. The detailed testing and analysis in the *Character of Growth* appendices further demonstrate the thorough process undertaken to define these areas. This approach guarantees that new developments are contextually appropriate while maintaining flexibility where applicable.

Matter(s) of Agreement or Disagreement

- 7.12 LBE and the GLA agree that the above response from LBE is sufficient to resolve the GLA comment.

Locations

GLA Response

- 7.13 A number of areas identified as potentially suitable for tall buildings are small in scale, often covering just a few existing buildings and often directly adjacent to another identified appropriate location. Where such locations are clustered and adjoining in this way, LBE should consider whether it would be more appropriate to identify broader areas, rather than specific sites.

LBE response

- 7.14 The designated tall building locations have been defined through a comprehensive analysis of the borough’s character areas, ensuring that developments respond appropriately to their surroundings. All of the tall building zones span multiple site boundaries, as they are defined by the firstly the characters areas they emerge from their final boundary is determined by the detailed testing and analysis process. The detailed testing and analysis in the *Character of Growth* appendices further demonstrate the thorough process undertaken to define these areas. These areas have been robustly developed by a detailed evidence base developed in cooperation with relevant stakeholders such as Historic England.

Matter(s) of Agreement or Disagreement

- 7.15 While this is not a general conformity issue, LBE and the GLA are continuing to work together to review the proposed approach and agree the position.

Application Standards

GLA comment

- 7.16 Policy DE6 includes an exception that tall buildings can be acceptable in areas not currently identified as suitable for tall buildings, providing they meet the other requirements of the Development Plan. It is recommended that these exceptions be removed. Policy DE6, part of paragraph 4, and all of 6 reference the operation of the planning system and should be deleted to be consistent with the rest of the plan.

LBE Response

7.17 Policy DE6 has been carefully designed to ensure that tall buildings are designated in appropriate areas such as in town centres and around public transport hubs. These considerations ensure that buildings fit appropriately within the local context, as detailed in the *Character of Growth Report*. However, there are proven examples in the borough such as the New Avenue development in Southgate, where buildings technically defined as tall (i.e. taller than 21m) have been delivered with minimal impact on the townscape due to topographical features that reduce their visibility. In this example, the development sits at the bottom of a natural basin in an area of hills meaning that whilst technically a tall building, it is not perceived as such. Paragraph 5 of the policy allows for such opportunities, optimising sites where appropriate. Exceptions for ancillary and operational equipment (e.g., communication equipment and industrial stacks) will continue to be permitted, provided they do not significantly impact the skyline. Removing this limited exception would create issues with regard to the industrial intensification and telecommunications objectives in the plan. This approach strikes a balance between functional needs and the borough's visual integrity. However, LBE does accept that the policy could be tightened to be more specific.

Matter(s) of Agreement or Disagreement

7.18 The Borough and GLA partially agree how Policy DE6 can be modified to remove the Mayor's general conformity objection:

- Deleting part 6 of Policy DE6; and
- Amending part 4 of Policy DE6 as below:

DE6: Tall Buildings.

~~"4. Figure 7.4 also shows the maximum potentially appropriate height that is acceptable in design terms. Proposals for height above this level must therefore be justified with reference to the requirements of other development plan policies and/or material considerations.~~

5. Proposals for height resulting from changes in topography ~~unusual site conditions (e.g. where the topography creates a lower apparent ground level when viewed from the surrounding area, or where a proposal seeks to introduce a significant civic use that would justify additional prominence will be considered on their merits.~~

~~6. Proposals that do not meet the above location and/or height parameters must be justified with reference to the requirements of other development plan policies and/or material considerations".~~

7.19 The GLA and LBE do not agree on the proposed changes to DE6 part 5.

8. Industrial Land

8.1 The Mayor welcomes the draft ELP's ambition to deliver over 300,000sqm of industrial floorspace, providing jobs for residents of Enfield and beyond. However, much of this growth is predicated on the release of Green Belt sites to provide the necessary space.

Introduction

- 8.2 In previous representations, the GLA had mistakenly assumed that Ravenside and Meridian 7 were already designated industrial sites, leading to an overestimation of industrial land loss at Meridian Water. The Borough has since confirmed that industrial land at Meridian Water is limited to 2.54ha, with scope to provide for additional industrial provision at the former IKEA site. Discussions are ongoing with the site promoter to agree the industrial quantum.
- 8.3 In addition, any minor industrial land loss is offset by adjustments to SIL changes elsewhere and with the addition of (contested) Green Belt allocations.
- 8.4 Modifications are proposed to provide additional clarity regarding land and floorspace changes in Policy E1 and Monitoring Indicator 12 (economic floorspace), which seek to address the GLA's concerns regarding 'plan monitor manage' and additional clarity in the plan text. These are discussed below.

Industrial and Logistics Needs

GLA comment

- 8.5 The draft ELP sets out that there is a need for 304,000sqm of industrial and logistics space over the Plan period. This clarity is welcomed as such space is vital to the success of London and the functioning of its economy. It would be beneficial if the draft ELP could separate this need out into its component parts so there is more clarity over the different types of uses required.

LBE Response

- 8.6 The evidence base and Employment Topic Paper [TOP4] already provide a detailed breakdown of the need between industrial uses and logistics. However, this breakdown is not currently reflected in the supporting text of the Plan. LBE is open to a minor amendment to include this information, ensuring consistency with the evidence base and offering a clearer picture of the distribution of industrial and logistics needs. This addition should also address the GLA's concerns regarding the 'Plan, Monitor, and Manage' approach. LBE agrees to expand Paragraph 9.11 of the Plan to reference additional qualitative evidence from the Plan's evidence base, offering a more comprehensive understanding and ensuring alignment with the supporting data.
- 8.7 To improve clarity and support the 'Plan, Monitor and Manage' approach, the Plan will specify floorspace quantum for B2/B8 and office uses in Monitoring Indicator 12, proposing 190,000 sqm of warehousing (B8) and 120,000 sqm of Core Industrial uses, including B2. Core Industrial Uses encompass manufacturing and specialised construction activities, generally operated from industrial property (B2) but also include Sui Generis and Industrial E class units as set out in the Employment Land Review [EMP1].
- 8.8 The Plan uses the term 'Core Industrial' rather than a simple 'B2' to recognise that not all industrial activities occur in B2 or B8 premises; many industrial sites include Sui Generis uses.
- 8.9 Additionally, the Plan will introduce specific criteria under Policy E1, Part 2 to clarify the reconfiguration of SIL/LSIS land:

- a. The balance of existing Industrial land in in Enfield will broadly be maintained in line with policy E12 (Meridian Hinterlands):
- b. In addition:
 - New SIL will be developed at RUR.03 (5.16ha), RUR.04 (12ha) and RUR.05 (3.47ha)
 - Established estates at Beavertown Brewery (2.66ha) and Angel Road (2.2ha) will be designated as SIL
 - Undesignated land at 5 Pickets Lock & Wharf Road Industrial Estate will be designated as LSIS

8.10 These adjustments will increase the SIL by 29.44ha and LSIS by 3.04ha, as outlined in the Employment Topic Paper [TOP4].

Matter(s) of Agreement and/or Disagreement:

8.11 The GLA is partly in agreement with the above suggestions, however the GLA still feel it is important to understand the further breakdown of the Core Industrial need so this can be planned and monitored effectively. Core Industrial uses -120,000 sqm is a significant amount of the overall floorspace requirements; and from the explanation from LBE Core Industrial also includes Class E Industrial uses.

8.12 If it is not possible to provide this breakdown for technical reasons, the GLA would be concerned that there is no clear understanding of the proportion of industrial need that may depend more on the provision of designated industrial land and separation from sensitive uses, i.e. Class B uses, and those that tend to be less dependent on designated industrial land and can potentially / more easily be intensified and located near other uses, i.e. industrial Class E uses.

8.13 LBE recognises the GLA's preference for a more detailed breakdown within the "Core Industrial" category to distinguish between uses that typically rely on designated industrial land (e.g., Class B) and those that may not (e.g., industrial Class E). However, the current approach in the Plan is aligned with the GLA's own definitions, which broadly associate Core Industrial uses with corresponding Use Classes: general industry (B2), warehousing and storage (B8), and light industry (E(g)(iii)). This alignment reinforces that LBE's approach is based on a practical framework consistent with regional expectations and the evidence base, as set out in the Employment Land Review [EMP1].

8.14 The aggregated categorisation for Core Industrial uses is effective in addressing Enfield's needs while maintaining flexibility in site allocation and land use classifications. LBE believes this approach balances the need for designated industrial land with the practicalities of sustainable urban development.

8.15 LBE remains committed to working closely with the GLA on these points as the Plan progresses, ensuring our strategy continues to support both local and strategic priorities. Further dialogue will enable us to refine and enhance our approach, ensuring effective planning and alignment with broader regional objectives.

8.16 This issue currently remains outstanding and needs further discussion.

GLA comment

8.17 Table 9.1 of the draft ELP sets out the locations where industrial floorspace could be intensified. However, the table does not set out if the sites are designated Strategic Industrial Locations (SILs) or Locally Significant Industrial Locations (LSISs), or the Use Classes they could accommodate.

Matter(s) of Agreement and/or Disagreement:

8.18 Both parties agree that LBE will update Table 9.1 of the Plan to include SIL and LSIS designations, such as 'Heritage House (SIL)' or 'Crown Lorry Park' (LSIS)', to provide clarity on each site's classification.

8.19 Additionally, Table 9.1 will include a total floorspace figure for SIL and LSIS sites, summing to 293,063 sqm, to further clarify the scope of intensification. This addresses the GLA's concerns, and LBE and the GLA will work to update Policy E1 accordingly.

8.20 The title of Table 9.1 will also be revised to indicate it applies specifically to the intensification of B use classes. This modification will be submitted to the Inspector in LBE's response to PQ22.

Brownfield Sites First

GLA comment

8.21 While the majority of additional capacity could come about through the intensification of seven existing sites, the draft ELP also identifies the release of three Green Belt sites in order to accommodate identified need. The draft ELP suggests that opportunities for industrial intensification in the borough are limited due to viability challenges. Given the likelihood that viability for industrial intensification will become more attractive from the middle of the Plan period, it is suggested that Enfield employ a plan, monitor, and manage approach as set out in Part C of Policy E4 of the LP2021. Brownfield sites should be allocated accordingly and earmarked for industrial intensification typologies with more challenging sites phased from the middle of the Plan period onwards.

LBE Response

8.22 The Borough has profiled its delivery of new floorspace following consultation with landowners and an understanding of viability and achievability. As set out in the Green Belt Topic Paper More challenging intensification sites are already programmed in the mid and end of the plan period party to reflect this risk and market evidence that market conditions (esp. viability and build costs) need to improve before they can be relied on. Recent experience from Development Management colleagues confirm this view – that the Borough needs to be cautious in the short term.

8.23 Due to challenges in securing intensive industrial formats, coupled with exceptionally strong demand for new logistics space following Covid, the plan provides a mix of green/brownfield land in the short term before relying on brownfield only approach later on the plan period.

Matter(s) of Agreement and/or Disagreement:

8.24 The GLA is not certain that all brownfield opportunities have been explored and have been exhausted. LBE, however considers that extensive assessments have been conducted, and available brownfield sites have been evaluated in consultation with landowners. The Plan reflects an evidence-based approach, balancing market viability with the pressing need to meet industrial space demands, which necessitates a mix of greenfield and brownfield options early on.

Policy Referencing

GLA comment

8.25 There is an incorrect policy reference - Policy E7.

LBE Response

8.26 LBE is happy to correct this.

Matter(s) of Agreement and/or Disagreement:

8.27 Both parties agree that a minor drafting correction will be made to the Plan.

Policy E5 Agent of Change

GLA comment

8.28 Policy E5 Part D of the LP2021 is clear that development proposals including residential within or adjacent to SILs should not compromise the integrity or effectiveness of these locations in accommodating industrial type activities and their ability to operate on a 24-hour basis, including those in adjoining boroughs such as in Haringey to the south of Meridian Water. Particularly in the context of the LBE's intended approach, the draft ELP should be amended accordingly and should take into account the Mayor's Agent of Change principle as set out in Policy D13 of the LP2021.

LBE Response

8.29 LBE believes the Agent of Change principle is already embedded within Policy E5 and explicitly referenced in the Hinterlands Policy related to Meridian Water. The relationship between developments and adjacent SIL land (including Haringey's SIL) is carefully considered. Phases 1 and 2 of Meridian Water have already been consented and are being implemented, and the IKEA site (SA5.3) includes specific guidelines on how its relationship with nearby industrial uses should be addressed.

8.30 LBE and Haringey have signed a Statement of Common Ground, and the Agent of Change principle has not been raised as a point of disagreement between the two boroughs².

Matter(s) of Agreement and/or Disagreement:

None.

² https://www.enfield.gov.uk/_data/assets/pdf_file/0012/62022/Duty-to-Cooperate-Statement-Planning.pdf

Phasing and space in advance.

GLA comment

8.31 LBE should note that where SIL is planned to be released for residential use, Policy E7 Part D2 of the LP2021 makes it a requirement that the intensified industrial, storage and distribution uses are to be completed in advance of any residential component being occupied and this should be made explicitly clear in the policy.

LBE Response

8.32 Paragraph 9.83 of the ELP regarding the Meridian Water Hinterlands (where SIL losses are proposed already states:

"Where new residential development is proposed, the intensified industrial floorspace should be completed in advance of any residential occupation, in line with London Plan Policy E7 Part D."

8.33 This requirement is also reiterated in Policy E5, which requires:

"Relevant proposals involving industrial loss] are phased to secure the completion and operation of the employment components of the scheme before first occupation of any non-employment uses."

Matter(s) of Agreement and/or Disagreement:

None.

Light Industrial Uses

GLA comment

8.34 Paragraph 9.77 suggests the SIL to be retained within Meridian Water can accommodate lighter industrial uses. However, light industrial uses now fall within Class E and are afforded little protection. Furthermore, SIL is home to heavier industrial uses often vital in meeting strategic demand and Class B uses should therefore be the focus within these key areas on the strategic road network.

LBE Response

8.35 The Borough believes that the SIL designation, with its clear industrial focus as required by the London Plan, provides sufficient safeguards to ensure that development adheres to core SIL principles. This helps mitigate the risk of inappropriate uses and ensures that light industrial activities, which are vital for many sectors, can continue to thrive within SIL.

8.36 While Paragraph 9.77 accepts that some Class E uses may be acceptable in SIL, this is limited to those not appropriate for town centre locations (which would not include offices as a nationally defined town centre use). The Borough will explore the use of design guides to ensure flexibility for Class E properties while maintaining their industrial functionality.

8.37 Both the Borough and the GLA have previously expressed concerns with the Government regarding the introduction of Use Class E. However, since Class E has been implemented, neither the GLA nor the Borough can outright reject proposals for light

industrial uses within industrial designations and especially given the explicit references to workshops and light industrial uses as acceptable SIL uses in the London Plan.

- 8.38 The Council will explore the potential of using design guides and supplementary planning guidance to ensure that Class E properties are designed with flexibility. This will enable them to function effectively as industrial stock, ensuring they remain adaptable for industrial uses where necessary.
- 8.39 The Meridian Water team will take the lead in this initiative, ensuring that developments within SIL remain the required focus while offering the flexibility to support light industrial uses, where appropriate, in line with the London Plan.

Matter(s) of Agreement and/or Disagreement:

- 8.40 GLA notes this and agrees this is principle.

Masterplans

GLA comment

- 8.41 Draft ELP Policy D2 suggests that masterplans can apply to a portion of a site. However, to be consistent with LP2021 paragraph 6.7.2, where SIL or LSIS is to be released, masterplans should cover the whole of the SIL or LSIS area. The Mayor's practice note on Industrial intensification and co-location through plan-led and masterplan approaches (2018) is clear that masterplan approaches are area specific and should consider the whole of a designated SIL/LSIS and their surrounding context. As such we would request that Policy D2 is amended to address this.

LBE Response

- 8.42 LBE agrees with the GLA's two-stage masterplanning process. However, for Meridian Water, requiring a whole-SIL masterplan would cause delays. The Plan's approach ensures progress while maintaining flexibility. For other areas, the Plan supports whole-SIL masterplanning where appropriate.
- 8.43 To ensure comprehensive guidance, the Plan refers to the preparation of masterplans, planning briefs and Supplementary Planning Documents (SPDs) under Policy SS2. This approach allows for a phased and flexible strategy to guide development across SIL and LSIS areas in line with local conditions, while also supporting alignment with the Mayor's practice note on industrial intensification and co-location.

Matter(s) of Agreement and/or Disagreement:

- 8.44 The GLA agrees as long as this is in line with Policy E7. This may require further discussion. LBE remains open to further dialogue with the GLA to refine this approach as needed, ensuring that it supports both Enfield's priorities and broader regional goals outlined in Policy E7. This collaborative approach allows us to adapt masterplanning efforts to local contexts while upholding the strategic framework.

Increases in industrial floorspace

GLA comment

8.45 Table 9.4 sets out increases in industrial floorspace that could potentially be made at Meridian Water. This is welcomed, but LBE should make clear what the resulting needs for Use Class B8 and B2 are as a result of the proposed reconfiguration.

LBE Response

8.46 LBE is working closely with the Meridian Water (MW) team to refine the final mix of space between B2 (general industrial), B8 (storage and distribution), and industrial SG (sui generis) uses within the development. Based on market advice, it has become clear that developers are increasingly seeking flexibility between B2 and B8 uses, as they share similar physical characteristics in modern industrial spaces.

8.47 Given the critical issue of viability for delivering replacement industrial space, LBE is mindful of the need to maintain flexibility in how these spaces are allocated. We acknowledge that specifying the exact balance between B2 and B8 at this stage may be premature, as doing so could restrict adaptability to evolving market demands and conditions.

8.48 LBE also recognises that Meridian Water will be delivered across different economic cycles, during which the needs and specifications of industrial space are likely to shift. For example, the future needs of the motor trade in SG garage space are expected to change as those firms transition to electric vehicles. Therefore, LBE considers it pragmatic for policies on the exact mix of uses to remain flexible.

8.49 While we understand the GLA's interest in more detailed information on the final mix, LBE believes it is crucial to retain flexibility to ensure future developments can respond effectively to market conditions and deliver viable industrial spaces. As planning progresses, LBE will continue to assess and adjust the approach based on ongoing market feedback and development viability considerations.

Matter(s) of Agreement and/or Disagreement:

8.50 The Borough has considered specifying the balance between B2 (general industrial) and B8 (storage and distribution) uses at this stage. However, current market evidence and advice do not support making such distinctions, given the flexible nature of modern industrial spaces and the evolving demands of the market.

8.51 To address this, the Borough will amend the supporting text in the policy to provide a clearer link between the evidence base and the anticipated split between B2 and B8 uses across the Borough. This will help guide more detailed site-specific evidence and policy development as the project progresses.

8.52 The LPA is actively working with the Meridian Water team to explore ways to provide additional detail, particularly regarding smaller sectors or specific uses, to address the GLA's concerns. Any relevant amendments to the policy will be made in response to this ongoing engagement.

9. Transport

9.1 The aspiration of the draft Enfield Local Plan (ELP) to support sustainable growth and enable movement through walking, cycling, and public transport is welcomed by the Mayor.

GLA comment

- 9.2 There are significant concerns about the ability of the rural placemaking areas, particularly at Crews Hill to deliver genuinely sustainable neighbourhoods that would not be car dependent. A robust, masterplanned and phased implementation strategy that ensures delivery of infrastructure and public transport services upfront and a realistic funding strategy that supports such delivery and optimises use of land is necessary to achieve the objectives of Good Growth.
- 9.3 However, the high cost of providing the necessary transport infrastructure and services to support a new settlement which is isolated from existing centres, may not be realistic or viable. There is a real risk that these areas, if developed, could become car dependent, have poor access to essential local services and result in further pressure on the road network.

LBE Response

- 9.4 LBE is committed to developing a robust, masterplanned, and phased implementation strategy for infrastructure and public transport services, aimed at supporting sustainable development and reducing car dependency.
- 9.5 While this type of development may be less common in London, the Borough is confident that semi-rural locations can be made sustainable in line with national policy objectives. Through careful planning and targeted investment in transport and infrastructure, we are committed to ensuring that even in less urbanised areas, residents and businesses will thrive in a sustainable, accessible environment.

Matter(s) of Agreement and/or Disagreement:

- 9.6 Agreement regarding the sustainability of developments at Crews Hill – and the proposals, as currently designed at Chase Park - may remain a point of contention. However, LBE is committed to demonstrating that these areas can be developed sustainably.
- 9.7 LBE will continue to refine and strengthen its transport strategy, focusing on how these sites can be supported by necessary infrastructure and public transport services, to further address concerns and meet sustainable development goals.

Signed on behalf of GLA by:



Name: Rachael Rooney

Role: London Plan Manager, Greater London Authority

Date: 1st November 2024

Signed on behalf of LBE by:



Name: Perry Scott

Role: Executive Director of Environment and Communities

Date: 1st November 2024