



Enfield Local Plan (Regulation 24) 2024

Stage 1 Matters, Issues and Questions

Matter 3: Employment Land Need and Supply

Tuesday 28 January 2025

London Borough of Enfield

Matter 3: Employment Land Need and Supply

Issue 3.1: Whether the assessment of overall employment land need and requirement is justified, positively prepared, consistent with national policy and in general conformity with the London Plan

Q3.1. Are the requirements for additional floorspace justified and based on robust and up-to-date evidence of need?

Response

- 3.1.1 Yes, – the Borough has kept its economic evidence base up to date; reflecting the need to be plan positively as we emerge from the Covid period.
- 3.1.2 The evidence base is justified, based on robust evidence, and adopts a method and approach that is in line with the Planning Practice Guidance Note.
- 3.1.3 As set out in the Employment Topic Paper [TOP4] the Employment Land Review was updated in December 2023 [EMP1] to inform the Regulation 19 version of the Enfield Local Plan and its land allocations.
- 3.1.4 The Borough is aware that a number of developers have concerns regarding the scale of intensification that may be achievable – the Borough has looked to take a pragmatic line whereby intensive formats are relied on in the middle to end of the plan period; when developer confidence has built and viability / deliverability concerns have been addressed by the market. The Borough fully supports the London Plan’s intensification agenda but recognises the development industry concerns around relying on these formats.
- 3.1.5 The Borough is also aware that there are concerns regarding any future office-type provision in the plan. While the ELR has calculated an office-based need following the PPG, the Council accepts that a pragmatic approach is needed to determining applications in the short term while also balancing the need for flexibility over the plan period – including the need for policies to be flexible enough to accommodate needs not anticipated in the plan, and allow for new and flexible working practices and spaces to enable a rapid response to changes in economic circumstances.
- 3.1.6 The Borough has directed its office need to Meridian Water (a long-term development opportunity) and agreed with the GLA to develop a E class focused SPD for this area.

Q3.2. Do the requirements appropriately reflect the quantitative and qualitative need for those forms of development over the Plan period?

Response

- 3.2.1 Yes, as set out in the Employment Topic Paper [TOP 4, para 9.5] the plan meets its quantitative industrial need primarily through intensification on brownfield sites with the development of three greenfield sites needed to meet quantified need in full.
- 3.2.2 Regarding qualitative industrial need, the site allocations reflect the qualitative evidence base [EMP1] and the explicit reference in London Plan (paragraph 2.1.30) to the Lee Valley as a logistics location. This qualitative evidence, and particularly the strength of the logistics sector here, has also been used to assess the intensification capacity of sites with a focus on providing intensified formats that meet our qualitative logistics need.
- 3.2.3 Provision for lighter uses (including Eg(iii) and smaller manufacturing units) are made in Meridian Water where a wider mix of economic uses is proposed, including the designation of 5.8ha of new LSIS at Harbet Road.
- 3.2.4 With regards to offices, the Enfield Local Plan seeks to balance its quantitative need via new allocations at Meridian Water as set out in the Employment Topic Paper [TOP4], paragraph 3.52 onwards. Meridian Water is identified as a new Town Centre in the plan, and Call for Sites submission by the master developer indicated an appetite for new office provision, so Meridian Water is considered to be an appropriate location to direct new office demand. Meridian Water was originally promoted for 100,000 sqm but the allocations in the Plan sum to only 40,000sqm (the Boroughs assessed need) reflecting the weak market evidence relating the deliverability of office formats.
- 3.2.5 Meridian Water is considered the most appropriate location partly because it is a very long term opportunity and the plan does not envisage strong demand for significant office space in the short term. In line with the NPPF, the plan still needs to be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices and to enable a rapid response to changes in economic circumstances (NPPF paragraph 86).

Q3.3. Are the requirements for additional floorspace consistent with the expectations of the London Plan?

Response

- 3.3.1 Yes, as set out in the Employment Topic Paper [TOP4, paragraphs 2.23-25] the Borough's quantitative need, for both office and industrial need aligns with the GLA's more strategic evidence. Our requirement for additional floorspace is informed by an extensive evidence base developed to understand the scope for intensive formats reflecting the London Plan's strong emphasis on meeting London's needs via intensified formats.
- 3.3.2 According to the LILDS (London Industrial Demand Study 2017), 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) or 13,520 sqm per annum. This figure broadly aligns with the industrial/logistics requirement identified in the 2023 Employment Land Review of 13,818 sqm per annum.
- 3.3.3 The LOPR (London Office Policy Review) 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 Employment Land Review of 1,818 sqm per annum.
- 3.3.4 In response to GLA comments, and as set out in the GLA SOCG, the Borough has made a modification to Monitoring Indicator 12 to provide more clarity regarding the split of industrial uses and specifically B class separate from E.