

# London Borough of Enfield

## Regeneration & Economic Development Scrutiny Panel

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**Subject:** Strategic Industrial Sites, planning policies, Enfield Local Plan - Progress and timelines and relevance to Meridian Water

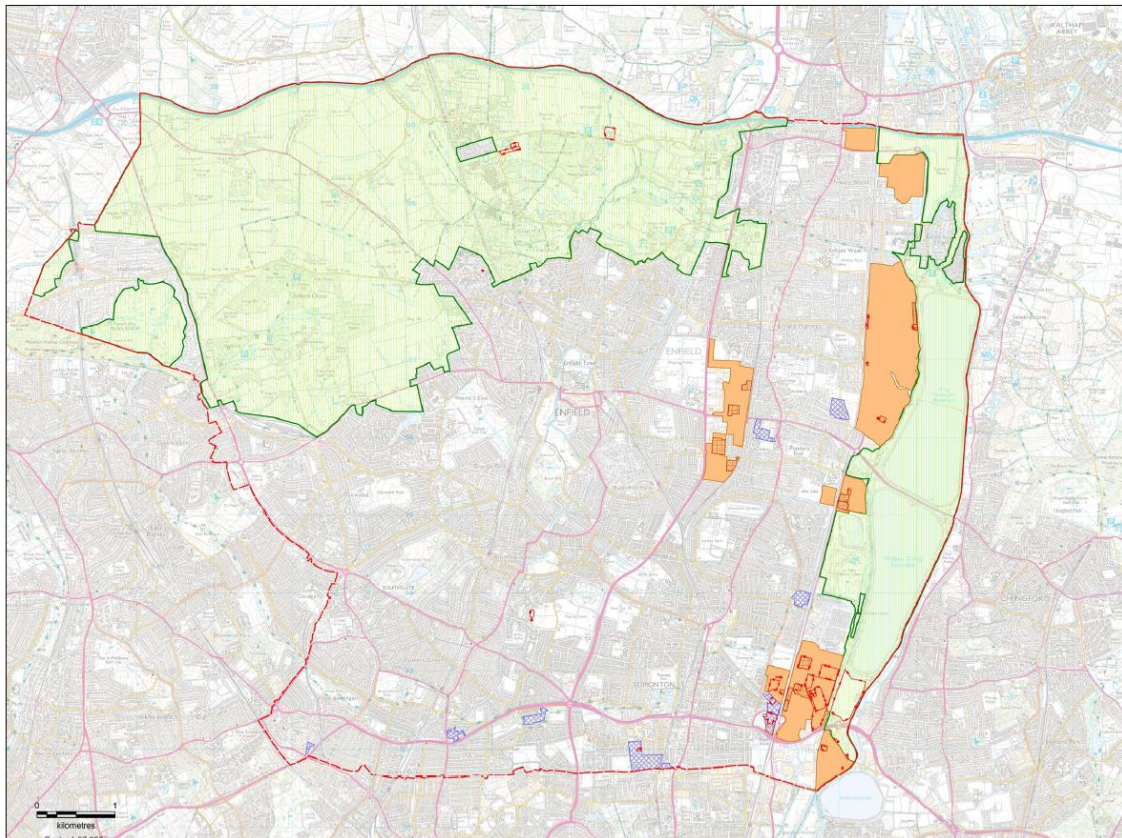
**Cabinet Member:** Cllr Nesil Caliskan  
**Executive Director:** Sarah Cary

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### Purpose of Report

1. This briefing paper is for noting purposes only, around the topic areas of 1) Strategic Industrial Location policies, 2) proposals relating to SIL intensification 3) progress on the Enfield Local Plan including timelines and 4) relevance to Meridian Water.

### Strategic Industrial Location (SIL) Policy



2. The Plan above shows the concentration of industrial sites in the borough. Industrial Estates shown in orange are designated as Strategic Industrial Location (SIL) and lighter purple as Locally Significant Industrial Sites (LSIS).
3. The requirement to ensure that the supply of employment sites can meet identified needs is grounded in national policy. The National Planning Policy

Framework (NPPF) indicates that ‘plans should positively seek opportunities to meet the development needs for their area and ‘strategic policies should as a minimum, provide for objectively assessed needs for housing and other uses’<sup>1</sup>. It indicates that plans should be ‘prepared positively, in a way that is aspirational but deliverable’<sup>2</sup>.

4. Strategic policies need to ‘make sufficient provision for housing, **employment**, retail, leisure and other commercial development’<sup>3</sup>:
  - 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.’<sup>4</sup> (para 22); and
  - ‘provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period’<sup>5</sup> (para 23).
5. The NPPF also requires Local Plans to ‘set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period.’<sup>6</sup> (Para 81).

## London Plan

6. London Plan was adopted in March 2021 and is the Spatial Development Strategy for Greater London. It sets out a framework for how London will develop over the next 20-25 years and the Mayor’s vision for Good Growth.
7. The Plan is part of the statutory development plan for London, meaning that policies in the Plan should inform decisions on planning applications across the capital. Enfield is preparing a new Local Plan, which must be in general conformity with the London Plan.
8. The broad thrust London Plan policies is to address the need to provide sufficient industrial, logistics and related capacity and where possible seek to deliver intensified floorspace capacity in either existing and/or new appropriate location – supported by appropriate evidence.
9. Policies of relevance to this briefing note are set out in policies:
  - E4: Land for industry, logistics and services to support London’s economic function – *this policy requires the borough to provide sufficient supply of land and premises to meet current and future demands for industrial and related functions. This considers strategic and local employment land reviews, industrial land audits and the potential for intensification, co-location and substitution.*

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<sup>1</sup> NPPF Para 11

<sup>2</sup> NPPF para 16

<sup>3</sup> NPPF para 20

<sup>4</sup> NPPF para 22

<sup>5</sup> NPPF para 23

<sup>6</sup> NPPF para 81

- E5: Strategic Industrial Locations (SIL) – the policy sets out London’s reservoir of SILs<sup>7</sup> - and recognises that SILs should be managed proactively through a plan-led process to sustain them as London’s largest concentrations of industrial, logistics and related capacity for uses that support the functioning of London’s economy. In Enfield, this includes: 1. Brimsdown 2. Freezywater/Innova Park 3. Great Cambridge Road and lastly 4. Central Leaside Business Area – which includes Harbet Road, Eleys Estate and Montagu north in Enfield, clusters of land in Haringey and strips of SIL in Waltham Forest.
- E6: Locally Significant Industrial Locations (LSIS)
- E7: Industrial Intensification, co-location and substitution – provides a supportive policy framework for intensification.

10. The detailed policy wording can be found in [Chapter 6 of the London Plan](#).

## Local Plans

11. Alongside the London Plan, the recently adopted North London Waste Plan (2022), Core Strategy (2010), Development Management Plan, 3x Area Action Plans (North Circular Road area, North East Enfield and Edmonton Leaside) – makes up the Borough’s Local Plans.
12. The broad thrust of local policies echo those of the London Plan – primarily to facilitate economic growth and improve the industrial estates. Policies of most relevance are:
- Core Policy 14: Safeguarding Strategic Industrial Locations
  - Core Policy 15: Locally Significant Industrial Sites
  - DMD Policy 19: Strategic Industrial Locations
  - DMD Policy 20: Locally Significant Industrial Sites
  - DMD Policy 21: Complementary and Supporting uses within SIL and LSIS
  - DMD Policy 22: Loss of Employment Outside of Designated Areas
  - Policy EL14: New SIL in Edmonton Leaside – which seeks to designate Deephams STW (34ha) as an additional SIL
  - Policy EL15: Improving existing industrial areas including: Industrial land at Meridian Water, Southern & Northern parts of Montagu Industrial Estate, Aztec A406 Industrial Business Park and Claverings Estate
13. North London Waste Plan was adopted in July 2022 and forms part of Enfield’s Development Plan. Covers land use planning aspects of waste management across 7 boroughs – as the Local Planning Authority. For Enfield, the general thrust of policies in this Plan is to seek to ensure that there is a better spread of waste sites across north London, so Enfield does not have the ‘lion’s share’ of waste in the borough. Key policies are:
- **Strategic Objective B:** Seek a Better Geographical Spread of Waste Sites Across North London, Consistent with the Principles of Sustainable Development
  - **Priority Area:** Eley’s Estate

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<sup>7</sup> London Plan Figure 6.2 and Table 6.2

- **Policy 2:** “Developers should first seek sites in Priority Areas outside Enfield, and must demonstrate that no sites are available or suitable before considering sites within Enfield’s Priority Area.”

### Emerging Plans

14. To ensure the Local Plan is up to date and continues to have a robust basis for determining planning applications, the Council has started the process of preparing a new Local Plan covering the plan period between 2019 and 2039. Enfield’s new Local Plan (ELP) will set out the planning framework on how growth will be delivered in a sustainable manner that maintains and enhances the quality of the many distinctive places that make up the borough. In addition to addressing Enfield’s acute housing crisis, it will also provide the planning framework to enhance social, and physical infrastructure provision, whilst providing a framework to enhance blue and green infrastructure through improved access to blue and green spaces and access to nature, as well as climate change adaptation and mitigation. Once adopted, the New Local Plan will replace the existing policies contained in the Core Strategy (2010) and Development Management Document (2014).
15. The ELP is still in its early stages, at the moment the plan is draft and policies hold no material weight in the determination of the planning applications. However, the general thrust of the ELP policies on strategic industrial land seek to provide an uplift in the supply of employment space whilst realising wider spatial objectives including the London Plan, NLWP, AAPs and the council’s own corporate plans – in particular the realisation of the Council’s Economic Development Strategy’s objective of an expanded business base, encompassing growth sectors such as film and television and low carbon industries, as well as the borough’s long-standing strengths of manufacturing and logistics activities.
16. The plan can be found here:  
<https://www.enfield.gov.uk/services/planning/new-enfield-local-plan>.
17. The emerging policy position on SIL is set out in draft Policies:
  - **SP E1: Employment and growth** – the preferred option set out would ensure a sufficient supply of sites to meet almost of all the borough’s needs for industry and logistics. The approach entails the development of Green Belt Sites. Restricting development solely to urban sites only meet about half of the borough’s needs for industry and logistics. Sites are proposed in Table 9.1:
    - SA8: Sainsburys Baird Road (Southbury) for 20,885 sqm
    - SA46: Crown Road lorry park (Southbury) for 4,530 sqm
    - SA47: Ravenside Retail Park (Meridian Water) for 21,645 sqm
    - SA48: Land at 135 Theobalds Park Road (Crews Hill) for 3,250 sqm
    - SA39: Travis Perkins (Palmers Green) for 3,209 sqm
    - SA49: Land to the south of Millmarsh Lane (Brimmsdown industrial estate) for 10,500 sqm
    - SA32: Sainsburys, Green Lanes for 13.325 sqm
    - SA50: 6 Morson Road for 2,600 sqm

- SA30: Claverings Industrial Estate
  - SA52: Land west of Rammey Marsh for 70,200 sqm
  - SA53: Car Park site, Wharf Road for 5,115 sqm
  - SA54: Land east of Junction 24 of the M25 for 30,550 sqm
  - SA55: Land to the north west of Innova Park for 16,445 sqm
- **SP E2: Promoting jobs and inclusive business growth** – of relevance is part 2 of the policy which seeks to designate and protect SIL and LSIS to support the long term growth of industrial businesses related services in the borough.
  - **SP E3: Protecting employment locations and managing change** – which seeks to protect and increase the capacity of SILs, whilst seeking to safeguard LSISs and non-designated industrial sites in meeting borough-wide and local needs.
  - **SP E5: Transforming Strategic Industrial Locations and Locally Significant Industrial Sites** – recognises that Enfield plays a major role in securing industrial intensification and successfully delivering policy E7 of the London Plan.
  - **DM E6: Redevelopment of non-designated industrial sites** – given that the demand for industrial sites will continue, this policy seeks to protect industrial space.

### **Commentary on Strategic Industrial Sites currently under redevelopment**

18. The Montagu Industrial Estate redevelopment has obtained planning, and was recently discussed at a scrutiny meeting.
19. British Land own Heritage House and they are currently consulting on a redevelopment of the site. The applicant has begun preapplication engagement with the public and ward Cllrs. They have also set up an engagement website - <https://futureofheritagehouse.co.uk/> . This is the borough's first industrial intensification scheme. The proposals are a multi-decked logistics scheme, providing 36,000 sqm of logistics floorspace over two levels. In addition, over 1,000 sqm of SME space is proposed as small workshop units to the Southbury Road frontage.

### **Relevance to Meridian Water**

20. The council is preparing a draft Supplementary Planning Document for the western bank of Meridian Water. This is the area west of the River Lee Navigation, not including the area covered by Harbet Road SIL (i.e. the east bank). Consultation on the draft SPD closed on 14 December 2022. The Council is now in the process of analysing the representations made and will be updating the SPD in due course.
21. The purpose of the SPD is to add further detailed guidance to the policy framework set out in the Edmonton Leaside AAP. The SPD supports the delivery of around 5,000 new homes, alongside a new town centre, new and improved green spaces, naturalised waterways and improved connectivity.

The SPD seeks to manage transitions between existing and new activities to ensure that all land uses can thrive.

### **De-designation of the East Bank (Harbet Road SIL)**

22. Any designation of SIL will need to be informed by a borough wide employment land review and the approach taken through a local plan. This piece of work is underway and will inform the next stage of the ELP.
23. The Meridian Water and Plan Making Teams are currently working together to explore the issues surrounding SIL designations in the Meridian Water area. Harbet Road SIL has been considered for de-designation for some time. The Council's proposals for de-designation were rejected by the inspector as part of the ELAAP examination in 2019 due to the wider policies to protect SIL and the lack of compensation SIL.
24. As part of the Local Plan consultation, Meridian Water has proposed de-designation of the majority of Harbet Road SIL, with compensatory capacity re-provided in the 'Northern Band' of Meridian Water, immediately adjacent to the North Circular Road. Any potential de-designation would need to be pursued through the Local Plan, and must form part of a borough-wide SIL strategy where additional SIL is provided.
25. The borough-wide land supply position is currently being established through two key pieces of Local Plan evidence – the Housing and Economic Land Availability Assessment (HELAA) and Employment Land Review (ELR).

### **Local Plan Progress and Timelines**

26. Work continues on the preparation of the Local Plan, with further workstreams being undertaken on a number of key pieces of evidence base documents including an update to the Housing and Employment Land Availability Assessment (HELAA)<sup>8</sup>, Transport Assessment and Employment Land Review. Enfield's evidence base to inform the ELP is emerging and continuously being updated and published <https://www.enfield.gov.uk/services/planning/evidence-base>
27. Refinement to the employment policies will be informed by the outcomes of the ELR and representations received as part of the Reg-18. Due to this ongoing work, the timetable in Enfield's current [Local Development Scheme](#) is no longer applicable.
28. An updated Local Development Scheme will be published in 2023 providing updated timescales for the publication of the proposed submission plan (Regulation 19) and submission timetable.
29. Next steps
  - Further engagement with stakeholders
  - Refinement of spatial strategy, strategic policies and detailed policies
  - Finalise the consultation statement and publish representations before next plan

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<sup>8</sup> Following the most recent Call for Sites July 2022

- Publish Housing and Employment Land Availability Assessment – Mar-23
- Progress transport assessment Nov-22 to Mar-23
- Progress Employment Land Review Oct-Dec-22
- Progress Authority Monitoring Report (21/22) and update Five Year Housing Land Supply Mar-Apr-23
- Revise Statement of Community Involvement by Mar-23
- Update Local Development Scheme Mar-23
- Refinement and testing of Plan Apr-Sep-23
- Seek approval to consult on Reg-19 Oct-Dec-23
- Consultation on Reg-19 early-24

## **Conclusions**

Please see the attached presentation for more information.

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