Article 4 Direction – Statement of Justification

London Borough of Enfield

July 2020
Quality information

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Revision History

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<td>1</td>
<td>May 2020</td>
<td>Initial draft</td>
<td>SB</td>
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<tr>
<td>2</td>
<td>June 2020</td>
<td>Draft report following client comments</td>
<td>SB</td>
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<tr>
<td>3</td>
<td>July 2020</td>
<td>Final report</td>
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This report has been prepared while in the first weeks of the UK COVID-19 lockdown. While the full implications of this on the content of this report are not yet known, there may well be medium and long-term implications for Government, Mayoral and/or Borough policies and the relative funding priorities as currently set out in this report.

At the time of writing, the draft London Plan was available as an ‘Intend to Publish’ version which was submitted by the Greater London Authority to the Secretary of State for approval on 9 December 2019. On 13 March 2020, the Secretary of State issued a Direction pursuant to s.337(6) of the Greater London Act 1999. The Direction prevents publication of the London Plan until a range of matters are addressed to the satisfaction of the Secretary of State to achieve consistency with national policy. On 24 April 2020 the Mayor wrote to the Secretary of State seeking to resolve the issues that have been raised by the Secretary of State through discussion by their officials, so as to enable the London Plan to be adopted. It remains open to the Mayor – should he conclude that inadequate progress is being made with the Secretary of State – (i) to challenge the Direction by bringing a claim for judicial review, on or before 12 June 2020; or (ii) to abandon the plan.
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Introduction

1. This Statement of Justification presents the case for the non-immediate Article 4 Direction (A4D) proposed by Enfield Council to remove permitted development rights (PDR) for the change of use from office (Use Class B1(a)) to residential (Use Class C3) in Enfield Town Major Centre, Southgate District Centre, Southbury Local Centre, and their environs.

2. This paper summarises the evidence supporting the proposed A4D in question, first to demonstrate why the Council believes it to be necessary, and second to provide the rationale for the type of A4D chosen and the locations to which it will apply.

3. The structure of this paper is as follows:
   - Introduction:
     - A brief overview of the planning framework for PDR and A4Ds;
     - The relevant planning policy context in Enfield;
   - Justification:
     - Summary;
     - Primary justification: Loss of office space;
     - Secondary justification: Housing need and quality;
     - Supporting justification: Risks to heritage;
   - Scope of proposed A4D:
     - Immediacy;
     - Extent;
   - Conclusion;
   - Appendix: maps of scheme locations, A4D boundaries and conservation areas.

Planning framework for PDR and A4Ds

PDR

4. In an effort to increase the supply of housing, Government introduced temporary legislation in 2013 allowing for the conversion of buildings of selected use classes to residential use without the need for full planning permission and associated obligations. This is one of a number of permitted development rights (PDR), granted in the Town and Country Planning (General Permitted Development) (Amendment) (England) Order 2013.1

5. The relevant provision of the legislation permits ‘Development consisting of a change of use of a building and any land within its curtilage from a use falling within Class B1(a) (offices) of the Schedule to the Use Classes Order, to a use falling within Class C3 (dwelling houses) of that Schedule.’2 Prior approval for the conversion is not obligatory, but the developer must apply to the Local Planning Authority (LPA) for a determination as to whether a prior approval is required as to transport and highways impacts of the development, contamination, and flooding risks on the site. The LPA can decide that prior approval will not be required for a given scheme, or that it is required and subsequently grant or refuse such approval.

6. Originally applying for a temporary period of three years, PDR were made permanent in April 2016.3 The legislation was amended to consider noise issues in the prior approval process and to require applicants to specify the number of dwellings proposed.

7. PDR have undergone recent changes and are expected to continue to evolve in the near future. An additional matter for prior approval consideration is to be introduced from 1st August 2020, allowing Councils

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1 Available at: http://www.legislation.gov.uk/uksi/2015/596/contents/made.
2 Ibid.
to assess whether proposed schemes provide adequate natural light. This will allow for greater scrutiny of potential office to residential (O2R) schemes in Enfield on an important consideration for occupant wellbeing. However, natural light has not been identified as a particular issue with the residential stock that has historically come forward in this way in Enfield, and this change is not considered to obviate the need for the proposed A4D.

8. It is also understood that the Government intends to expand PDR in the near future to cover schemes involving the demolition of vacant commercial buildings and their replacement with new housing, among other proposed changes relating to non-office uses.  

A4Ds

9. Article 4 Directions (A4Ds) exist as an optional direction through which individual LPAs may seek to reimpose the requirement for planning permission in specific areas or premises, effectively removing PDR.

10. Originally widely used in relation to heritage and conservation issues (including in the case of Enfield), an A4D can be pursued only in exceptional circumstances where the exercise of PDR would harm local amenity or the proper planning of the area. The Secretary of State retains the right to modify or cancel any A4D they consider to be ‘inappropriate’ or ‘disproportionate’.

11. Planning Practice Guidance (PPG) states that:
   - The use of article 4 directions to remove national permitted development rights should be limited to situations where this is necessary to protect local amenity or the wellbeing of the area. The potential harm that the direction is intended to address will need to be clearly identified, and there will need to be a particularly strong justification for the withdrawal of permitted development rights relating to:
     a) a wide area (e.g. those covering the entire area of a local planning authority, National Park or Area of Outstanding National Beauty).
     b) cases where prior approval powers are available to control permitted development.  
   - Provided that there is justification for both its purpose and extent, an article 4 direction can:
     a) cover an area of any geographic size, from a specific site to a local authority-wide area.
     b) remove specified permitted development rights related to operational development or change of use.
     c) remove permitted development rights with temporary or permanent effect.  

12. Considerations as to the precise nature of the A4D being proposed for Enfield, in line with PPG, are discussed in the ‘Scope of proposed A4D’ section of this paper.

Enfield’s planning policy context

13. Given the acknowledgement in PPG that PDR have the potential in certain cases to frustrate the proper planning of a given area, and that A4Ds provide an appropriate remedy where this is the case, it is relevant to consider the adopted and emerging policy objectives and provisions in Enfield regarding O2R PDR conversion.


15. The Council plays an active role in protecting and supporting the delivery of employment land for office uses. Adopted policies in Enfield’s Core Strategy and Development Management Document (DMD) include a number of stipulations that communicate the Council’s planning strategy for office employment land, make provision for O2R change of use (prior to PDR), and establish the role of key town centres. Relevant adopted policies, which have effectively been superseded by the introduction of PDR, include the following directions:

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8 Paragraph: 037 Reference ID: 13-037-20140306; revision date: 06 03 2014.
- London Plan 2016 Policy 4.2: Boroughs should consolidate and extend the strengths of their office markets by focusing new development on viable locations and supporting managed conversion of surplus capacity to more viable, complementary uses, and ‘monitor the impact of government liberalisation of Permitted Development rights for changes of use from offices to residential.’

- Core Policy 17: ‘The Major Centre of Enfield Town will continue to be supported as the main destination for . . . office uses’; residential uses are not listed as a key or supported use in Enfield Town Centre;

- Core Policy 19: Enfield Town Centre will be protected and enhanced as ‘the main location in the borough for new office development’ and the ‘renewal and modernisation of existing offices’; office uses will be protected in Southgate town centre subject to evidence of demand, and surplus offices in other locations will be supported for conversion where evidence of a lack of demand can be demonstrated;

- DMD 22: Loss of office floorspace will be resisted in key locations ‘unless it can be demonstrated the site is no longer suitable and viable for continued office use’, and only permitted if there is ‘appropriate mitigation for the loss of employment’;

- DMD 24: The loss of office units under 50 sqm suitable for SMEs will be refused;

- DMD 30: The re-use of upper floors of commercial and retail space is encouraged, including for residential;

16. These policies responded to clear evidence of the value of office uses, particularly to Enfield’s key town centres, and the important role of the Council in protecting such uses where it is reasonable and justified to do so. It is also clear that the Council’s intention is not to prevent the loss of office uses in all circumstances, but to ensure that each case is considered on its own merits, with particularly vulnerable segments of the stock afforded stronger protection and measures put in place to mitigate potential impacts on local employment.

17. Enfield is in the process of preparing a new Local Plan 2018-2036, which underwent Regulation 18 consultation from December 2018 to February 2019. The draft Local Plan Issues and Options publication 2018, along with other consultation materials, highlights a number of objectives that align with the adopted policies referenced above and either explicitly seek the retention of office space-based employment or would be indirectly advanced by greater control over O2R PDR:

- Protect employment land that is needed;
- Target service-based sectors;
- Nurture the SME base;
- Focus on high jobs density land uses;
- Enable local businesses to grow;
- Provide higher wage jobs;
- Promote town centre and high street vitality and viability; and
- Provide jobs closer to home so Enfield residents can live and work in the borough.9

18. These objectives are implemented through the draft Local Plan’s emerging policies. It is noted, however, that these are less prescriptive than the adopted policies reviewed above, due in part to the early stage of the Local Plan at Regulation 18, the weakening of planning controls over change of use brought about through PDR and the increasing urgency of boosting the supply of housing. Following the making of the proposed A4D associated with this paper, as well as progress on related evidence base preparation on housing need, employment land and past and pipeline O2R conversions, the Council may consider adaptations and additions to these policies. Key stipulations are as follows:

- Draft New London Plan Intend to Publish version (DNLP) Policy SD6: Town centres should be the primary locations for commercial activity and important contributors to the local economy. ‘The redevelopment, change of use and intensification of identified surplus office space to other uses including housing should be supported, taking into account the impact of office to residential permitted development rights and the need for affordable and suitable business space.’

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9 Issues and Options publication 2018.
• DNLP Policy E1: ‘Existing viable office floorspace capacity in locations outside the areas identified in Part C should be retained, supported by borough Article 4 Directions to remove permitted development rights where appropriate, facilitating the redevelopment, renewal and re-provision of office space where viable and releasing surplus office capacity to other uses.’

• Draft Policies E1d, E2e, and E3: Support is given for the provision of additional office floorspace;

• Draft Policy E2l: Change of use proposals must ‘demonstrate the premises have been vacant for over 12-18 months, following active marketing’ and include compatible employment uses;

• Draft Policy E2l: Proposals involving loss of employment floorspace are expected to deal with relocation requirements for affected businesses; and

• Draft Policy TC2: Housing will be promoted in centres where existing functions are not prejudiced.

19. While the adopted policy provisions will cease to be redundant and the emerging policy provisions would gain importance if the proposed A4D to control PDR O2R conversions is successful, the Council recognises that this does not in itself constitute a justification to remove PDR. It is worth pointing out, however, that the primary justification for the proposed A4D – to stem a potentially irrevocable loss of office space – is consistent with the objectives of those policies.
Justification

Summary of justification

20. As noted above, PPG states that A4Ds 'should be limited to situations where this is necessary to protect local amenity or the wellbeing of the area' and 'the potential harm that the direction is intended to address will need to be clearly identified'.

21. The primary justification for the proposed A4D to remove PDR from O2R conversions in key Enfield locations is the likely future harm to the Enfield economy and local employment which would be caused by the continued loss of office space following a high volume of recent conversions.

22. The conversion of offices in Enfield has surged since the introduction of PDR in 2013, to the extent that vacancy is now at a historical low and a deficit of office supply is imminent. This amounts to direct harm and affects the wellbeing of the area. In particular, it risks the departure of local businesses and jobs if rents rise to a level where they are no longer affordable to the average Enfield company. The conversion pipeline shows little sign of slowing down, which warrants measures to protect the further loss of employment space.

23. The secondary justification for the proposed A4D is the opportunity cost associated with the inappropriate housing mix that has come forward through O2R PDR conversions:
   - It is homogenous rather than aligned with the mix required to serve identified local needs;
   - It does not provide any of the affordable housing urgently needed in the borough; and
   - It is inconsistent in terms of quality, space standards and accessibility.

24. While the impact on housing supply does not amount to direct harm, it is clearly linked to the wellbeing of the area. The proposed A4D would bring future conversion schemes within the normal planning system, allowing them to make a more meaningful contribution to local housing need.

25. It is worth noting that the consequences of the Covid-19 pandemic are likely to have a bearing on the demand for office space and the nature of housing demand, in addition to the wider economic impacts on small businesses and individuals in the borough. At this point in time it is not clear exactly what effects this will have in the short or the long term, but the Council will monitor the situation and review its strategy in this area accordingly.

26. A further supporting justification is risk to the heritage value and function of the borough's conservation areas posed by schemes taking place outside of the purview of the normal planning process and the mitigation measures associated with it. This particularly applies to certain parts of the three geographical extents covered by the proposed A4D under consideration.

27. The successful implementation of this proposed A4D will bring the conversion of office accommodation to residential uses in Enfield within the jurisdiction of the normal planning system. Proposals will therefore once more be subject to the more detailed process of scrutiny and negotiation by the Council as part of the planning application system, with schemes subject to policy requirements including those preventing the conversion of office units of a particular size, and those relating to housing mix and tenure.

28. The purpose of making this proposed A4D is not to place a blanket restriction on future conversions, but to give the Council an appropriate level of control to assess each case on its own merits and on the basis of local evidence: to protect the highest-quality, most affordable and/or most appropriately sized office stock in relation to local supply and demand; to release persistently vacant office units in inappropriate locations for better use; to secure affordable housing and a more balanced dwelling mix; and to retain office space where it remains the more appropriate use.

29. The evidence specifically relating to Enfield, as well as lessons inferred from consideration of the experience of other Councils, strongly suggests that a particular form of A4D is most appropriate in this type of case. Namely, that the following would be most appropriate in Enfield:
   - One non-immediate A4D;
   - Applying only to O2R change of use (and not to any other PDR);

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• Having effect within and immediately surrounding the geographical extents of Enfield Town Centre, Southgate District Centre, and Southbury Local Centre only.

30. The rationale for this form of A4D, including more detailed evidence on the scale and impact of O2R PDR in the proposed locations, is set out in the subsequent section entitled 'Scope of proposed A4D'.

31. The primary, secondary and supporting justifications relating to the borough as a whole are presented in turn below.
Primary justification: Loss of office space

32. The scale of the loss of Enfield’s office space since the introduction of PDR in 2013 is significant. The total estimated quantity of office floorspace converted to residential use through PDR in the period 2014-2018 is 25,396 sqm, or 11% of the total office stock existing in 2013.11 For comparison, the evidence base supporting the 2016 London Plan found that prior approval applications for O2R PDR submitted by March 2015 represented a loss of around 4% of London’s office stock.12

33. Although the pace of O2R PDR conversions has slowed from its initial peak of 17 schemes in 2015 and 12 schemes in 2016, an average of 5-7 schemes per year has been sustained in the borough in the years since. This is borne out by a pipeline of 25 future conversions of which the Council is aware at present. Maps showing the locations of completed and pipeline schemes are provided in the Appendix, Figures 2 to 5. This snapshot in time suggests that demand from developers to undertake conversions through PDR remains buoyant now that the model is proven (with anecdotal evidence from agents suggesting that the resulting residential units have sold quickly).

34. The 25 known pipeline schemes are expected to result in the loss of a further 15,790 sqm of office floorspace.13 This represents 7% of the borough’s remaining office space (as of 2019). If completed, more than one sixth of all the office accommodation existing in Enfield prior to the introduction of PDR will have been lost. With a negligible quantity (under 5,000 sqm) of forthcoming new office supply available to replenish Enfield’s stock, PDR conversion is effectively eroding a finite resource.14

35. While a non-immediate A4D will not prevent the current wave of conversions already in the pipeline, it can give the Council the ability to stem further loss if appropriate.

36. The vacancy rate for office space in Enfield is currently 1.7%.15 This is extremely low compared to historic rates in the borough (above 3% prior to 2014), to other Greater London sub-markets (the Functional Economic Market Area (FEMA) average in 2016 was 3.3%), and very significantly below the frictional vacancy rate of 8% put forward in the London Office Policy Review (LOPR) 2017, below which additional supply is needed to bring an office market back to an equilibrium operating state.16

37. Demand for office space in Enfield is not projected to increase but is stable – with compound annual growth in available space of 0.6% to 2036 required to accommodate employment projections that need to be met to support the borough’s economy. This is, incidentally, higher than the 0.5% annual growth required in the wider FEMA that Enfield is part of.17

38. It is acknowledged that these forecasts may need to be revised in light of the consequences of the Covid-19 pandemic on the financial health of Enfield businesses and a possible shift toward more home-working.

39. Enfield’s historically low vacancy rate is due primarily to the reduction in available stock caused by PDR conversion. The average quantity of office floorspace occupied between 2010 and 2019 was 221,946 sqm.18 During that period, the quantity of total floorspace (both occupied and vacant) has declined from 232,992 sqm in 2013 to 224,474 sqm in 2019.19

40. If a further 2,528 sqm of office space is lost (this is highly likely with an estimated 15,790 sqm awaiting conversion in the pipeline), Enfield’s total stock will fall below the historic average occupancy level of 221,946 sqm for the first time in decades. This suggests that the continued conversion of Enfield’s office

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11 This is comprised of 20,050 sqm of lost space in the 30 schemes for which exact floorspace data is known and an estimate of 5,346 sqm in the 17 schemes for which that metric is not known. The estimate is calculated on the basis that the average floorspace lost per residential unit gained in all completed and pipeline schemes in Enfield is 51.4 sqm and those 17 schemes are expected to deliver 104 residential units. All data on the quantity of conversions is derived from Enfield Council completions and approvals data as submitted to the London Development Database (LDD) for the period 01-04-2013 to 31-03-2019, with approvals since that date gleaned from Enfield’s Planning Portal.
12 GLA Economics, Economic Evidence Base for London 2016, 4.5.2.
13 This is comprised of 10,290 sqm of lost space in the 12 schemes for which floorspace data is known and an estimate of 5,500 sqm in the 13 schemes for which that metric is not known. This estimate is calculated on the same basis as for completed schemes, described above.
14 Only one 5,000 sqm office scheme was recorded as under construction in 2019, with no other submitted applications; Costar 2019. While there is hope the Meridian Water development will help to remedy the shortage of stock beyond the timeframe of present projections, this is not confirmed. Meridian Water is also located in one specific part of the borough, and so will not necessary make up for loss that has taken place throughout, or in the key town centres where the loss is highly concentrated.
15 Costar 2019.
16 Ibid.; ELR Table 6.3; London Office Policy Review 2017 3.1.22.
17 The FEMA includes the following areas: Barnet, Broxbourne, Enfield, Epping Forest, Haringey, Hertsmere, Waltham Forest, and Welwyn and Hatfield, some of which have or intend to introduce A4Ds to remove O2R PDR; ELR 6.5.3.
18 Costar 2019.
19 Ibid.
stock to residential use will almost certainly result in an undersupply of office space, with knock-on effects for the local economy and employment.

41. Enfield’s relatively stable demand for office space, along with the correlation between stock lost to PDR and declining vacancy rates, is presented in Figure 1 below.

**Figure 1: Total Enfield office space and vacancy rate (2010-2019)**

42. It is worth emphasising that the expected deficit of office stock described here is not including Enfield’s forecast requirement of an additional 25,226 sqm of office space (on 2019 levels) by 2036. Even if only the 15,790 sqm of office space currently earmarked for conversion is lost in that period, the quantity of total new office floorspace needing to be built would rise to 41,016 sqm.

43. While the Enfield office market is not considered strategically important for Greater London, it is of local significance and a key segment of local employment that is growing in line with the Council’s wider placemaking strategy. It is the Council’s stated ambition to enhance and protect office provision, nurture the small and medium size enterprise (SME) base, and increase the number of higher-wage jobs in the borough. There were 17,300 office-based jobs in Enfield in 2016 (representing growth of 7.5% on 2015), and 4,900 are expected to be added by 2036. 93% of Enfield’s businesses can be considered SMEs, having fewer than 9 employees.

44. These employment projections and ambitions are unlikely to be achieved if the stock of office floorspace continues to fall below the amount projected to be required by local businesses, and if the decline in supply results in an increase in rental costs beyond what those businesses can afford. The average office rent per sqm in Enfield was £258.33 in 2019, following average annual growth of 6% over the past 5 years and representing a 42% increase on 2010 rents. This is already understandably exerting pressure on local businesses and can reasonably be expected to worsen if the rate of office space loss persists.

45. It is not only the overall loss of office space that harms the local economy; the particular segments of the stock most vulnerable to PDR conversion are also especially valuable. Since the introduction of PDR, the

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20 Costar 2019
21 To reach a forecast total need of 249,700 sqm; ELR Table 7-2.
22 Consultation document 2015 2.2.10: Issues and Options publication 2018 2.8.7 and p. 106.
23 This projection is the main basis for the forecast requirement of 25,226 sqm of additional office floorspace by 2036 referenced above; ELR Table 6-5.
24 Enfield Business Survey, quoted in ELR 3.11.2.
Office unit size bands that have been disproportionately affected by conversions now display the lowest vacancy levels.

46. Office units measuring less than 250 sqm were the most converted in 2014-2018 in terms of the number of schemes, at 59% of all conversions. This category of office space is perhaps the most important to local employment (due to the predominance of SMEs at 93% of all businesses), with a current vacancy rate of 1%.26 This fact warrants the current protection of units measuring less than 50 sqm in Enfield’s adopted DMD Policy 24 (which is currently ineffective for PDR conversions, but would become active again in the event of the successful implementation of the proposed A4D).

47. The larger 250-500 sqm size category also has a vacancy rate of 0% currently, after having experienced a significant amount of conversion.27 Particularly given the potential shortage of grow-on space required for SMEs identified in the 2018 ELR and the suitability of the relatively affordable existing stock to their needs, this size category is an equally at-risk segment of Enfield’s stock.28

48. Office accommodation measuring under 500 sqm, being more at risk from conversion, more strategically important to SMEs, more likely to deliver small studio dwellings if converted, less likely to meet the size threshold to bring forward affordable housing, and less effective in delivering towards Enfield’s housing need, warrants the ability to be protected through the Council’s normal powers of planning oversight.

49. The conversion of office space that is currently relied on for local jobs and incomes, to the point where supply falls below demand, is a present and significant risk of harm to Enfield’s economy. It is considered that office space is a vital local amenity and that office-based employment and income are significant factors in the wellbeing of the area, the protection of which from harm is the stated purpose of A4Ds.

50. The proposed A4D to control O2R change of use in Enfield provides a preventative measure to ensure that if conditions continue to tighten for local businesses and employment as a result of the declining availability of office space, it will be possible to restrict the flow of conversions accordingly,29 or to permit only those affecting office units in surplus size categories, in inappropriate locations, or of inferior quality.

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26 Ibid.
27 This size of unit represents 11.7% of completed conversions by floorspace but only 5.7% of the stock by floorspace; Costar 2019.
28 ELR 8.2.23; 3.9.1.
29 Demand from developers to convert to residential uses could sharply increase following the development of Edmonton Leeside and if Four Tracking and Crossrail 2 proceed as planned. Mechanisms to control PDR would need to be in place in advance of such decisions being made in order to respond to the probable spike in conversions being brought forward.
Secondary justification: Housing need and quality

51. The Council acknowledges the role of PDR in delivering more housing. Indeed, O2R PDR conversion has made a relatively significant contribution to housing delivery in Enfield since PDR was introduced. The Council is committed to increasing housing delivery and acknowledges the particular constraints and challenges this brings in Enfield.

52. However, the extent of this benefit from PDR is considered insufficient recompense for the cost incurred through the loss of employment space described above. Enfield’s average annual residential delivery rate from O2R PDR of 86 units represents just 0.07% growth on the current stock of housing but comes at an approximate cost of 2% of all existing office space in the borough.30

53. Furthermore, 86 additional dwellings per year represents only 7% of the borough’s proposed annual housing target of 1,246 in Draft New London Plan Intend to Publish version (DNLP). Even were all 224,474 sqm of office floorspace remaining in the borough in 2019 to be converted to residential accommodation, this would only be capable of delivering approximately 4,367 dwellings, equivalent to three and a half years’ worth of Enfield’s proposed target.

54. Enfield’s five-year land supply identifies land for 4,808 dwellings over the period 2018/19 to 2022/23, which represents a 20% buffer on the adopted London Plan (2016) annual target of 798 and would also address the previous three-year shortfall of 439 units.31 Enfield therefore does not rely on O2R PDR to meet its requirements. Sites sufficient to demonstrate a land supply in accordance with the higher DNLP target will be identified as part of the emerging Local Plan evidence base.

55. The core justification in this area, however, is that the housing that has come forward through O2R PDR is generally not aligned with identified local needs, nor of a consistently high quality. The proposed A4D is therefore justified, not to halt further housing supply through office conversion, but to bring future schemes (deemed acceptable in terms of the loss of office amenity) within the normal planning system. The impetus for this is threefold.

56. Firstly, dwellings brought about through O2R PDR conversion to date have been homogenous in terms of type and size. While it is not unexpected (nor theoretically undesirable) that 99% were flats or maisonettes, 98% also had two or fewer bedrooms.32 The Enfield Strategic Housing Market Assessment (SHMA) (2015) found that 50% of market housing and affordable rented housing should consist of three and four bedroom dwellings, with only intermediate housing of all tenures found suitable for one and two bedroom homes at a proportion greater than 50%.33 98% of all O2R PDR housing supply (being entirely market tenures) therefore falls into a typology that represents only 50% of need.

57. This housing mix does not represent a balance in terms of tenure or size and does not align with the need identified in the SHMA. Outside of the planning system, O2R conversions cannot be expected to deliver towards the borough’s identified need to supply larger homes (of more than 3 bedrooms) and a more diverse mix of units.

58. Although the impacts remain unclear, it is likely that demand for homes with more rooms, larger internal space, and more access to green space will be raised further as a result of the Covid-19 pandemic. However, the economic consequences of the virus response may also lead to greater affordability challenges for local households and a downturn in the housing market.34 The Council will continue to monitor the situation and assess its effects in this area.

59. A second important reason to bring O2R conversions within the purview of the planning system is Enfield’s acute need for affordable housing. The Enfield SHMA (2015) identified an annual net shortfall of 456 affordable rented dwellings over the period to 2032 in Enfield.35 Recognising the magnitude of the borough’s

30 At an average floorspace loss of 51.4 sqm per residential unit, 86 units would be expected to result in a loss of 4,420 sqm, which is 1.9% of the 224,474 sqm existing in the borough as of 2019; Valuation Office Agency (VOA) data for 2019 on the Council Tax Stock of Properties indicates that there are currently around 125,110 residential dwellings existing in Enfield as of 2019; An additional 86 new homes would represent an increase of 0.068%.


32 Between 2014 and 2018, 32.6% of O2R PDR residential units were studios, 46.2% were one bedroom, and 19.6% were two-bedroom homes.

33 Enfield SHMA 2015, Conclusions pg. 132. This finding is supported by more recent evidence that 47.3% of need on Enfield’s Local Housing Register is for family-sized homes, cited in the draft Enfield Local Plan Issues and Options publication 2018, 5.5.2.


affordable housing need, Enfield’s draft Local Plan (Issues and Options publication 2018) proposes a strategic target that 50% of new housing in the period to 2036 should be affordable. This is in line with the level of affordable housing need and the strategic target put forward in the DNLP, and also reflects the first of Enfield’s five priorities set out in the Enfield Housing and Growth Strategy 2020-3030.

Councillors are not allowed through planning obligations to require affordable housing or other Section 106 contributions from O2R PDR schemes. Applying Enfield’s adopted policy requirements to the completed and pipeline O2R PDR schemes known to the Council suggests that the maximum quantity of affordable housing that would have been provided were those schemes subject to policy is 275 units, subject to viability. For context, 275 units equates to 50.4% of all affordable housing delivery in the borough between 2014 and 2017 (546 units in total).

The successful implementation of the proposed A4D will allow the Council to require affordable housing requirements on O2R conversions, considering viability through its Whole Plan Viability assessment (and, where necessary, through scheme-based appraisals), and to ensure that the housing delivered is suitable in tenure and size to address local needs.

Thirdly, the quality of housing brought forward through PDR conversion is not consistently high, with potential knock-on effects on occupant health and wellbeing.

As part of the work to underpin the proposed A4D, the Council assessed a representative sample of nine O2R PDR conversion schemes in Enfield against a set of metrics derived from space standards set out in Draft New London Plan Policy D4 (housing and quality standards) and Enfield Core Strategy Policy DMD 8 (general standards for new residential development). This assessment found that O2R PDR schemes in the borough generally scored poorly on three key metrics:

- Space standards (including those for individual rooms and entire units) - Around half of schemes did not meet nationally described guidelines;
- Provision of amenity space and communal areas - Just under half of schemes failed to provide any; and
- Wheelchair accessibility - Only 22% of schemes appear to provide at least 10% wheelchair-accessible dwellings in line with London Plan and local policy.

In addition to these general trends, a small proportion of schemes have been found to fall far short of standards and would therefore benefit from the scrutiny and enforcement that comes with a full planning application. It is noted that in some instances, developers have reduced unit sizes or removed amenities (such as parking spaces) as the scheme proceeds through successive proposals. In one particular example, the number of residential units in the scheme was increased from 76 to 92, with the average unit size being reduced from 23 sqm to 17 sqm (both being below nationally described space standards). Furthermore, the issue of quality in O2R PDR schemes is raised frequently by local community groups who have engaged with the Council on the subject.

In conclusion, allowing O2R conversions to take place through PDR presents a significant opportunity cost of not bringing forward a more balanced and appropriate size and tenure mix that addresses Enfield's acute and specific housing needs. As such, this form of PDR inhibits the Council’s ability to administer the proper planning of the area and indirectly risks occupant wellbeing.

This justifies the proposed A4D, which will bring O2R conversions within the normal planning system and the jurisdiction of Enfield’s evidenced policy requirements with regard to housing size mix and tenure, while allowing each scheme to be considered on its own merits with regards to quality.

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36 Policy H2.
37 Policies GG4, H4 and H5.
38 The priority is, in full: ‘More genuinely affordable homes for local people: building more homes that are the right kind of homes, in the right locations and for local people. This means homes that are well-designed and are the right size, tenure and price that local people can afford.’ pg. 6.
39 This is the standard that is required of all new residential development by Enfield Policy DMD 8 and DNLP Policy D5, with which PDR conversions are exempt from complying.
Supporting justification: Risks to heritage

67. Enfield has 22 conservation areas, approximately 480 statutorily listed buildings, and 263 entries on the Local Heritage List. These are protected to various degrees in planning policy from development that may cause harm or fail to conserve the character of the asset or location. The Enfield Heritage Strategy (2019) includes as two of its key objectives:

- Continue to manage the Borough’s heritage and its setting as appropriate to its significance through regulatory and planning functions and develop the instrumental value of heritage in place-making; and
- Maintain the character and significance of the conservation areas.

68. A number of A4Ds are currently already in place to enable more effective management of residential properties within conservation areas throughout the borough, with that covering Enfield Town being revised in 2017.

69. The importance of managing development across the borough’s conservation areas is clearly established in the relevant Conservation Area Character Appraisals and Conservation Area Management Proposals documents. Maps showing the boundaries of the two conservation areas covered by the proposed A4D (Enfield Town and Southgate Circus) are included in the Appendix, Figures 6 and 7.

70. The Enfield Town Conservation Area Character Appraisal highlights the area’s ‘considerable heritage merit’ and the threats to it:

- The Conservation Area constitutes the commercial and historic focus of the Borough and is defined by clear topographical features on the northern and southwest sections of its perimeter, separating it visually from its setting area.
- The market-town character of Enfield town centre radiates from this hub; the mediaeval core is overlaid with a few 18th century survivors, but mainly now with everyday, good-quality buildings of late 19th century and early 20th century commerce and public life.
- Although the ages and styles of its buildings are disparate, the town centre is given cohesion by its limited range of materials; the character of the buildings is derived as much from these materials as from their design.
- Crudely detailed and poorly proportioned shop fronts and fascias belie the good quality at the upper floor levels of individual buildings in The Town, and the 19th century parades and terraces of Church Street and London Road.
- Despite its considerable heritage merit, as summarised in paragraph 3.0 above, the town centre has struggled to retain its distinctive character in the face of economic, cultural, demographic and transport pressures. Whilst listed buildings are supported by detailed statutory requirements and government policy guidance on alteration and repair, domestic and commercial properties in a conservation area rely to a large extent on extra protection provided by the local planning authority, detailed design guidance, and conscientious development control procedures, if their character is to be retained.

71. The Southgate Circus Conservation Area Character Appraisal describes the area’s key assets and threats, as well as the potential opportunity provided by new building uses, when managed appropriately:

- The distinctive cylindrical station and its sweeping oval concourse are the focus of the Conservation Area - the confident simplicity of the geometry and the assured use of sweeping curves in three and two dimensions is in strong contrast to the accumulation of earlier buildings and rectilinear 1930s parades amongst which the station sits.
- The Conservation Area is primarily in retail and commercial use, focused on Southgate Station and the bus station, which together form an important transport interchange. The surrounding streets have

\[\text{Issues and Options publication 2018 3.2.2.} \]
\[\text{Core Strategy Policy 31, DMD Policy 44, Issues and Options publication 2018 Policies HE1, HE2 and HE3.} \]
\[\text{Objectives 10 and 15.} \]
\[\text{Enfield Town Framework Masterplan pg. 28.} \]
\[\text{Enfield Town Conservation Area Character Appraisal 2014 4.1.1.} \]
\[\text{2.1.2.} \]
\[\text{2.6.2} \]
\[\text{2.6.18} \]
\[\text{2.6.21} \]
\[\text{4.1.1.} \]
\[\text{2.4.1.} \]
Article 4 Direction Statement of Justification – L.B. Enfield

parades of shops and cafes at ground level, with flats or offices above, and there is one purpose-built office block, South Point. The station generates much activity throughout the day and evening.\(^{51}\)

- Most of the problems that still affect the area stem from the relatively low value commercial uses around the station.\(^{52}\)
- New uses for vacant buildings should be encouraged, both at ground (shop) level and above. New uses should be appropriate to the architectural interest of the building and aim to sustain the building fabric and reduce the pressure to make interventions such as the introduction of uPVC windows, external roller shutters and poor quality shop-fronts.\(^{53}\)

72. Change of use conversions through PDR proceed with limited oversight from the Council. Such schemes therefore have the potential to impact heritage assets without suitable mitigation measures being agreed and to have a harmful effect on their setting.\(^{54}\)

73. While listed buildings have not suffered direct, measurable harm from O2R PDR conversions, such schemes pose potentially significant ongoing cumulative harm to the appearance of conservation areas and the market town character of Enfield as a whole.

74. 10 completed O2R PDR conversions and 4 pipeline schemes are located within Enfield’s designated conservation areas, representing 12% of all schemes. Change of use conversions outside of the planning system can present a risk to the external appearance of a street arising from works to the external fabric, windows and other modern materials used, as well as to indirectly increase street clutter (such as the placement of bins) and car parking.\(^{55}\) These are identified as specific issues faced by the two conservation areas in their respective Conservation Area Character Appraisals.

75. The proposed A4D to remove PDR for O2R change of use conversions within the three town centres, two of which overlap with conservation areas, will help to safeguard these areas from erosion of their heritage character and patterns of use.

76. However, as noted above, this is not intended to prevent schemes from going ahead but to ensure that the Council fulfils its statutory duty to put in place proposals for the preservation and enhancement of conservation areas. Indeed, the Council recognises the potential opportunity arising from change of use conversions to the built fabric and vitality of town centres, particularly where existing buildings are vacant or in poor condition.

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\(^{51}\) 2.4.5.
\(^{52}\) 4.1.1.
\(^{53}\) 4.1.2.
\(^{54}\) The extent of the risks and mitigation measures employed are described in Enfield’s various Conservation Area Character Appraisals, Conservation Area Management Proposals, the aforementioned A4Ds from 2004 and 2017, Enfield’s 2019 Heritage Strategy, adopted Core Strategy Policy 31, adopted DMD Policy 44, and emerging Local Plan Policies HE2 and HE3.
\(^{55}\) Enfield Town Conservation Area Management Proposals, pp. 8-10; Southgate Circus Conservation Area Character Appraisal 2015 4.1.2.
Scope of proposed A4D

77. As noted in the Introduction to this Statement of Justification, the proposed A4D it supports has the following characteristics:

- It applies only to the change of use from office (Use Class B1(a)) to residential (Use Class C3);
- It is non-immediate, taking effect no less than 12 months after being issued;
- It applies to the previously established boundaries of Enfield Town Centre, Southgate District Centre, and Southbury Local Centre as well as targeted areas adjoining those centres.

78. It is considered that the above section sufficiently justifies the Council’s decision to limit the proposed A4D to the change of use from office to residential, and that because no evidence relating to other forms of PDR is being put forward, this aspect of the proposed A4D is adequately explained.

79. This section will therefore discuss the rationale for the other two characteristics of the proposed A4D, namely its immediacy (non-immediate) and the locations where it will take effect.

Immediacy

80. PPG states that ‘The circumstances in which an immediate direction can restrict development are limited. Immediate directions can be made . . . where the development presents an immediate threat to local amenity or prejudices the proper planning of an area. Immediate directions can also be made in relation to certain types of development in conservation areas.’

81. PPG suggests that immediate A4Ds covering whole types of development (e.g. O2R) may be appropriate in conservation areas. Although parts of both Enfield Town Centre and Southgate District Centre are classified as conservation areas, the intended coverage of the proposed A4D is wider. As such, an immediate A4D to control O2R PDR as a whole type of development for the intended boundaries appears not to be in line with the purposes intended by PPG.

82. PPG also states that ‘If a local planning authority makes an article 4 direction, it can be liable to pay compensation to those whose permitted development rights have been withdrawn’, if planning permission is subsequently refused or more limiting conditions are imposed. Compensation is payable only if the A4D takes effect within 12 months of issue. Non-immediate A4Ds with no compensation implications can therefore take effect at least 12 months after being issued.

83. As a result of the limitations set out in PPG and the compensation risks entailed, it is understood to be extremely rare for LPAs to pursue immediate A4Ds covering an entire category of development or change of use.

84. The evidence of actual and potential harm to local amenity brought by unchecked O2R PDR in Enfield is clearly demonstrated but is not deemed to constitute an ‘immediate threat’ or to be sufficiently urgent to countenance the high risk of compensation liability. Accordingly, the proposed A4D is non-immediate in nature, and no account of the potential financial liability is presented in this Statement of Justification.

Extent

85. PPG states that ‘there will need to be a particularly strong justification for the withdrawal of permitted development rights relating to: a wide area (e.g. those covering the entire area of a local planning authority . . .).’

86. Previous attempted A4Ds in other London boroughs have indeed faltered on this aspect in particular, and it is now widely understood that a successful A4D will generally be limited to a specific geographical area, or combination of areas.

87. In Enfield’s case the past impact of O2R PDR has been unevenly distributed across the borough. The four wards with the highest amount of office floorspace converted through PDR to date are Southbury, Grange,
Together, these wards contain 68% of completed conversions and 87% of known floorspace lost. This is detailed in Table 1 below.

Table 1: Total O2R PDR schemes and floorspace loss (sqm) per ward – completed schemes 2014-2018

<table>
<thead>
<tr>
<th>Ward name</th>
<th>Known floorspace loss</th>
<th>% of floorspace lost</th>
<th>Number of schemes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Southbury</td>
<td>6,270</td>
<td>31.3%</td>
<td>2</td>
</tr>
<tr>
<td>Grange</td>
<td>5,328</td>
<td>26.6%</td>
<td>7</td>
</tr>
<tr>
<td>Town</td>
<td>3,232</td>
<td>16.1%</td>
<td>16</td>
</tr>
<tr>
<td>Southgate</td>
<td>2,520</td>
<td>12.6%</td>
<td>7</td>
</tr>
<tr>
<td>Cockfosters</td>
<td>1,200</td>
<td>6.0%</td>
<td>1</td>
</tr>
<tr>
<td>Palmers Green</td>
<td>825</td>
<td>4.1%</td>
<td>5</td>
</tr>
<tr>
<td>Upper Edmonton</td>
<td>530</td>
<td>2.6%</td>
<td>2</td>
</tr>
<tr>
<td>Bush Hill Park</td>
<td>109</td>
<td>0.5%</td>
<td>1</td>
</tr>
<tr>
<td>Bowes</td>
<td>36</td>
<td>0.2%</td>
<td>2</td>
</tr>
<tr>
<td>Southgate Green</td>
<td>-</td>
<td>0.0%</td>
<td>1</td>
</tr>
<tr>
<td>Winchmore Hill</td>
<td>-</td>
<td>0.0%</td>
<td>3</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>20,050</strong></td>
<td><strong>100.0%</strong></td>
<td><strong>47</strong></td>
</tr>
</tbody>
</table>

89. It is therefore considered appropriate that the proposed A4D be limited to areas of key importance within those wards. The Council want to ensure that the geographical extents of the proposed A4D are not excessively wide but instead concentrate only on the most affected areas. The A4D is therefore proposed for the three town centres located within those boroughs, and which have seen high concentrations of PDR conversions, as well as small targeted areas adjoining those town centres that warrant protection for similar reasons.

90. The reasonable approach taken is to capture the established town centres within the A4D coverage and to include additional areas that are adjacent to those established town centres and are also considered key office locations.

91. The overall intention is to make the proposed A4D boundaries as tightly drawn as possible. As such, it is considered unnecessary and disproportionate to remove buildings with prior approval granted from the proposed A4D coverage. Rather, they are included within the proposed A4D coverage as a precautionary measure so that if the prior approvals go unimplemented and lapse, the Council may be able to scrutinise future proposals for converting them to residential.

92. The justification for including each of the three town centres is amply demonstrated by the concentration of past and pipeline conversions in these areas, their strategic economic importance, and the Conservation Area designations overlapping with parts of Enfield Town Centre and Southgate District Centre. It is considered that the additional areas adjoining the town centres are justified for inclusion owing to their close association in economic and geographic terms with the established town centres (particularly given that edge-of-town-centre locations are often the most appropriate to office use), but this overall justification is also supplemented by evidence specific to each area in the subsequent section.

93. The Council has carefully considered the Planning Practice Guidance and experience of other boroughs in determining which geographical extents are most suitable and acceptable for A4D protection, with the three town centres plus adjoining areas representing a balance between the scale of the impact of PDR and the appropriate geographical coverage of A4Ds. The Council will decide on the requisite notification and public consultation approach to be taken.

94. Maps of the proposed A4D boundaries are provided in Figures 8 to 14 in the Appendix. In the case of Enfield Town and Southgate, where additional areas adjoining the town centres are proposed for inclusion, a second map is provided to show the exact location of the additional areas in relation to the established town centre boundary.

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60 Enfield Town Centre is located on the border of the boroughs of Town and Grange.
Justification for established town centres

95. More than one third of all known O2R PDR schemes are located within the extents of the three town centres in question, with 26% of past office floorspace loss taking place there (18% if the more widely distributed pipeline schemes are included). The three town centres make up only 0.4% of Enfield’s total land area, so the degree of concentration is significant.

96. Detail is provided in Table 2 below, and the maps included in the Appendix (Figures 2 to 5) show the location of all schemes throughout the borough, as well as for the three town centres and their environs.

Table 2: Total O2R PDR schemes and floorspace loss (sqm) per town centre – completed schemes 2014-2018

<table>
<thead>
<tr>
<th></th>
<th>Number of schemes</th>
<th>% of total</th>
<th>Estimated floorspace lost</th>
<th>% of total</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Completed schemes</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Enfield Town Major Centre</td>
<td>10</td>
<td>21.3%</td>
<td>2672</td>
<td>10.5%</td>
</tr>
<tr>
<td>Southgate District Centre</td>
<td>4</td>
<td>8.5%</td>
<td>2619</td>
<td>10.3%</td>
</tr>
<tr>
<td>Southbury Local Centre</td>
<td>5</td>
<td>10.6%</td>
<td>1180</td>
<td>4.6%</td>
</tr>
<tr>
<td>Three centres total</td>
<td>19</td>
<td>40.4%</td>
<td>6471</td>
<td>25.5%</td>
</tr>
<tr>
<td><strong>Pipeline schemes</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Enfield Town Major Centre</td>
<td>4</td>
<td>16.0%</td>
<td>583</td>
<td>3.7%</td>
</tr>
<tr>
<td>Southgate District Centre</td>
<td>2</td>
<td>8.0%</td>
<td>304</td>
<td>1.5%</td>
</tr>
<tr>
<td>Southbury Local Centre</td>
<td>0</td>
<td>0.0%</td>
<td>0</td>
<td>0.0%</td>
</tr>
<tr>
<td>Three centres total</td>
<td>6</td>
<td>24.0%</td>
<td>887</td>
<td>5.6%</td>
</tr>
<tr>
<td><strong>All schemes</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Enfield Town Major Centre</td>
<td>14</td>
<td>19.4%</td>
<td>3255</td>
<td>7.9%</td>
</tr>
<tr>
<td>Southgate District Centre</td>
<td>6</td>
<td>8.3%</td>
<td>2923</td>
<td>7.1%</td>
</tr>
<tr>
<td>Southbury Local Centre</td>
<td>5</td>
<td>6.9%</td>
<td>1180</td>
<td>2.9%</td>
</tr>
<tr>
<td>Three centres total</td>
<td>25</td>
<td>34.7%</td>
<td>7358</td>
<td>17.9%</td>
</tr>
</tbody>
</table>

97. In addition to experiencing a high concentration of schemes, Enfield Town Centre and Southgate District Centre are considered by the Council to be the borough’s strategic locations for office employment, receiving associated protection in Core Strategy Policy 19. They are also identified as the key locations for office uses, with the greatest supply and highest quality stock, by the ELR.61 As the most suitable locations for office employment, it is reasonable that the loss of office uses in these locations should receive a greater degree of oversight and control than is afforded while PDR remain in force.

98. Enfield Town Centre and Southgate District Centre also warrant greater protection from unchecked change of use development due to their designation as conservation areas and the clearly identified risk to their heritage value, as described in the relevant section of this paper.

99. The justification for the proposed A4D to remove PDR from O2R change of use within the defined extents of Enfield Town Centre and Southgate District Centre is therefore threefold: they have experienced the highest concentration of floorspace lost in the borough, they are strategic employment areas and hubs of high-quality office employment, and they contain designated conservation areas with a demonstrated need for mitigation of cumulative harm to heritage and character.

100. Although Southbury Local Centre does not share these particular characteristics of strategic economic importance and conservation designation, it is only narrowly separated from Enfield Town Centre and in many respects forms a coterminous whole with it, in terms of employment uses and character. Having experienced a similar quantity of office floorspace loss to Southgate District Centre from completed schemes, it is also among the areas most impacted by PDR conversion in the borough. Given its limited size in comparison with the other two town centres, it is considered that the inclusion of Southbury Local Centre in the proposed A4D remains proportionate with respect to the strength of the justificatory evidence.

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61 ELR 4.3.38; 4.3.39; 5.3.1.
Justification for additional areas

Enfield Town – north-east of Town Centre

101. This area is home to a high concentration of office uses to the north-east of the established boundary of Enfield Town Centre. Including it under the coverage of the proposed A4D affords protection to a further 8,756 sqm of office space through the greater scrutiny of future conversion schemes (some of which, however, may already be converted before the A4D takes effect).

102. In addition to the large quantity of purpose-built office accommodation present in this location, it is put forward for inclusion in the proposed A4D because of the benefits to Enfield’s economy conferred by the organisations that presently occupy it, and its vulnerability to unchecked PDR conversion.

103. The quality of the environment is generally high, with a chain of purpose-built office buildings linked together along River Front. The location is well-served by transportation, with good road links to the A10, M25 and A406 North Circular Road as well as close proximity to Enfield Town Centre Railway Station and Enfield Town Overground station.

104. A wide range of medium sized businesses are present in the area, providing an array of local services and employing people with diverse skills. Key economic sectors supported include private social care, communications technology, recruitment and legal services, with multiple businesses in each sector effectively forming clusters with potential agglomeration benefits to productivity. The presence of recruitment and legal organisations play a key support role in the wider local economy.

105. This area is an active target for PDR conversion, with Refuge House likely to be converted in the near future and parts of other buildings known to already offer residential accommodation. This area is therefore high risk and the protection of its evident character as an office location clearly warrants protection.

Enfield Town – west of Town Centre

106. This area extends the proposed A4D coverage a short distance to the west of the established boundary of Enfield Town Centre. The office buildings existing in this location are estimated to currently supply 7,619 sqm of office space in total. This is a key source of office accommodation that, appropriately, exists slightly beyond the established town centre boundary.

107. The area encompasses Enfield Chase Overground station and the purpose-built accommodation that has been built within a short walk of this important transport hub. The office accommodation is generally occupied by locally orientated businesses, including several solicitors and accountancy firms, which are characteristic of Enfield’s local economy and a sector that could be harmed by the loss of suitable office space.

108. In addition, the area is home to two offices occupied by Metaswitch, a major local employer and the key component of the borough’s modest but high-skilled telecommunications sector. The ELR notes that this and similar businesses ‘give the Borough a foundation to build upon, to make knowledge and high technology sectors a more significant part of LB Enfield’s economy in the future’, and therefore warrant greater protection going forward. The ELR further notes that the office environment in these dedicated blocks in the east and west of the Town Centre is in good condition.

Enfield Town – south-west of Town Centre

109. This minor addition to Enfield Town Centre allows for the full curtilage of 87 Chase Road to be included under the proposed A4D protections as a precautionary measure to ensure that, if this recently renovated office building is extended into its car park in future, there will be no doubt that the entire site is included within the A4D coverage, if successful.

Southgate – north of District Centre

110. This area extends the proposed A4D coverage beyond the northern edge of the established boundary of Southgate District Centre. Based on the available data, there is a total of roughly 6,539 sqm of office space existing in the area, although two key premises have been earmarked for PDR conversion in the near future.

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62 ELR 4.3.38.
63 ELR 4.8.10-11.
64 ELR 4.3.38.
111. The area, which is strategically located in terms of public transport access, is highly vulnerable to future conversion and warrants inclusion under the proposed A4D coverage as a precaution against the further weakening of this purpose-built office environment.

112. Adding diversity to other parts of Southgate District Centre, this area forms an employment cluster focussed on property development, investment and estate management companies, including businesses responsible for regeneration of office and residential accommodation both within and beyond the borough.

113. The ELR states that ‘Southgate Town Centre has a number of very good quality small to medium scale offices in dedicated blocks (e.g. the Grange and Southgate Office Village) and above retail units. The environment is in very good condition’. 65

Southgate – south of District Centre

114. This area extends the proposed A4D coverage a short distance to the south of the established boundary of Southgate District Centre, where around 8,347 sqm of very good quality office accommodation exists.

115. The location is strategically important, with close proximity to Southgate underground station as well as to local educational institutions and hospitality businesses that have located here in part to serve office employees.

116. Key business sectors occupying office space within this area include housing associations (which provide benefits to local residents), and travel and transportation companies. Grange House is the highest profile office building in the area and offers co-working space to start-up companies and SMEs, in addition to units occupied by larger firms. A Premier Inn hotel was recently constructed next to Grange House to serve business travellers to the area, so the rationale for retaining this office stock extends to the other economic sectors that are dependent on it.

117. Nearby office accommodation has been converted to residential in recent years, suggesting that this area south of the District Centre is also considered a potential target for conversion and warrants greater protection and oversight from future conversion schemes.

65 ELR 4.3.39.
Conclusion

118. The proposed A4D accompanied by this paper is justified primarily by the continued impact to local business and the wider Enfield economy from the loss of office space through O2R PDR in three key locations. If no more than the pipeline schemes currently known to the Council are delivered, the total available quantum of office space in the borough will fall far below the average level of historic demand and frictional vacancy rate cited in the LOPR, impeding the proper functioning of the office market and increasing costs for local employers. The proposed A4D is a tool for managing change and will enable the Council to appropriately resist further loss and its associated consequences in future if necessary.

119. In addition, the housing mix so far delivered through O2R conversion is poorly aligned with identified local needs and nationally described quality standards. It continues to exaggerate Enfield’s past imbalance in terms of type and size; it provides no affordable housing at a time of acute need; and it frequently falls short of space and accessibility standards. The proposed A4D brings future schemes within the remit of the normal planning system and provides a mechanism to ensure they better deliver on the needs of local people.

120. Furthermore, O2R PDR presents a risk of cumulative harm to the heritage and character of Enfield’s conservation areas, where such schemes are most highly concentrated. The proposed A4D will allow for stronger oversight on the part of the Council and more effective mitigation of such risks.

121. The three town centres (and targeted adjoining areas) to which the proposed A4D applies contain the borough’s key employment clusters, the highest volume of office stock most appropriate to local demand, and overlap with two of its most important conservation areas. Yet they are also the locations where past and pipeline O2R PDR is most highly concentrated. Were the Council not intervening through the making of the proposed A4D, these areas would be at risk of irrevocable harm to their character and patterns of use, and the borough as a whole would be likely to suffer economic harm as businesses are no longer able to compete for increasingly scarce and expensive premises in these key employment areas.

122. The making of the proposed A4D does not mean that all O2R PDR conversions will be denied. This is not the Council’s intention. Its purpose is that O2R proposals be submitted as full planning applications that can be properly assessed against national and local policy objectives and be required where appropriate to mitigate associated harm to the borough’s economy, heritage, and resident wellbeing.
Appendix

Figure 2: The location of completed and pipeline O2R PDR schemes across London Borough of Enfield

Note that the two most recent pipeline schemes are not reflected on this map.
Figure 3: The location of completed and pipeline O2R PDR schemes in Enfield Town Centre
Figure 4: The location of completed and pipeline O2R PDR schemes in Southgate District Centre
Figure 5: The location of completed and pipeline O2R PDR schemes in Southbury Local Centre
Figure 6: Geographical extent of Enfield Town Conservation Area
Figure 7: Geographical extent of Southgate Circus Conservation Area
Figure 8: Proposed A4D boundary for Enfield Town Major Centre
Figure 9: Proposed A4D boundary for Enfield Town Major Centre, comprising the established town centre plus two additional adjoining areas
Figure 10: Proposed A4D boundary for Southgate District Centre
Figure 11: Proposed A4D boundary for Southgate District Centre, comprising the established town centre plus three additional adjoining areas
Figure 12: Proposed A4D boundary for Southbury Local Centre
Figure 13: Proposed A4D boundaries, Enfield borough-wide
Figure 14: Proposed A4D boundaries, Enfield borough-wide, comprising three established town centres, plus additional adjoining areas