

Transport for London

Written Statement on Matter 5

Key Diagram, Spatial Strategy and methodology for selecting site allocations

Issue 5.1 Whether the vision and strategic objectives have been positively prepared and are justified and effective.

Q5.1: Are the spatial vision and strategic objectives soundly based, justified by the evidence and is it clear how the Plan's policies will help to deliver the vision and strategic objectives over the Plan period?

No, in relation to Crews Hill and Chase Park strategic sites.

We welcome the aspiration of the Plan to support sustainable growth and sustainable mode share. However, there is lack of robust evidence and appropriate policies to support the delivery of Plan's vision and strategic objectives as currently set out. This specifically relates to sustainable development in the placemaking areas of Crews Hill and Chase Park and the vision for 75 per cent sustainable mode share in these areas.

It is our contention that, considered under the old NPPF, the green belt sites should not be released as exceptional circumstances have not been demonstrated. Considered under the December 2024 NPPF and the national Local Housing Need figures for London, and therefore the significant increase in housing targets in the next London Plan, an alternative approach should be taken to the green belt that optimises densities and enables sustainable transport choices.

Optimal densities and car parking restraint are critical to support sound place-making and ensure sufficient population density to enable cost-effective public transport infrastructure necessary for sustainable development. As indicated in Matter 1 answer to Q1.2, the current policies in SS1, PL10, PL9/11 need to include planning mechanisms and some key principles/parameters to optimise

densities, building height ranges, car parking restraint, and maximum car parking standards to ensure the spatial vision and strategic objectives are soundly based to achieve the target sustainable mode share.

In addition, to ensure that the Plan is sound and can be delivered, the emerging Infrastructure Delivery Plan must be updated to include indicative costs and timescales for the proposed public transport services and infrastructure (agreed with TfL and other stakeholders, as appropriate). This should be supported by a robust funding and phasing plan and a comprehensive bus and active travel strategy. Public transport service provision and active travel infrastructure for the two placemaking areas of Chase Park and Crews Hill must be categorised as essential infrastructure rather than important or desirable.

General Matters

Q5.2: Is the spatial strategy for the scale and distribution of growth, set out in Policy SS1, justified and appropriate for the sustainable development of the area when considered against reasonable alternatives? What reasonable alternatives were considered by the Council and why were these rejected?

No - We believe that there are alternative spatial strategies that could deliver more sustainable development outcomes and better contribute to national ambitions for house-building – building up the pipeline towards 88,000 homes per year for London as set out in the National Planning Policy Framework and new Local Housing Need figures published in December 2024. Also see answers to Q4.2, Q4.5 and Q4.6 in Matter 4.

Within the Green Belt, it is not clear if better connected land than the sites within Crews Hill and Chase Park were considered first. Crews Hill is served by Great Northern that has a frequency of only 2 trains per hour off-peak (4 trains per hour during peaks which is still considered below the 'turn up and go' threshold of six trains per hour) and served by only one infrequent bus service. Much of the Chase Park site is remote with only the southern part near Enfield Road. The south-western corner is more than a 15 minute walk from the

Oakwood station, which is beyond the PTAL threshold of a circa 12 minute walk. Within the Green Belt, we believe the areas closer to Oakwood and Cockfosters stations should have been considered first as these are served by the Piccadilly line with a service of 18 and 9 trains per hour respectively and therefore can deliver a significantly higher density of development. This in turn, alongside a significant increase in housing density overall, would make an additional bus service sustainable thereby unlocking even more housing.

A fundamental requirement for sustainable development is that it is well connected or capable of being well connected. Therefore, policy SSI is currently not justified nor appropriate for sustainable development. This remains the case even with the proposed improvements set out in the IDP (which may not be realistic or viable in the long-term).

Please, see also comments under Q5.1.

Strategic Transport Issues

Q5.8: Have the cumulative effects on the transport network been robustly assessed?

No - To robustly assess the cumulative effects of the proposed development of strategic Green Belt sites on the transport network, Enfield and TfL would need to agree public transport proposals and incorporate a specific bus network design, including bus priority, which could then be tested using strategic and local models. In addition, the proposed assumed densities, car parking ratios and other transport infrastructure would need to be agreed and considered appropriately. This has not comprised part of the strategic assessment thus far.

We have licensed the consultant to use the TfL's strategic model and agreed on parameters they suggested to input to support Enfield's Local Plan. The modelling approach should inform the mitigations needed and the policies. The parameters do not reflect the London Plan policies of Good Growth which we have raised concerns about,

for instance, car ownership ratios are not based on any restrained parking policies for large scale strategic development. The models use more of a 'predict and provide' approach rather than 'a vision-led' approach. The car ownership levels used in the modelling are based on what is predicted and not what will enable a sustainable mode share. Additionally, the proposals for public transport measures that will support the sustainable mode share have not been included. Enfield's consultants have used TfL's strategic modelling tools to assess the impact on highways and the public transport network at the borough level and in relation to adjacent borough highway based on transport assumptions in the strategic models. Insufficient attention has been given to impacts of additional passengers through proposed developments in Chase Park and Crews Hill on bus, national rail, Overground and Underground services, congestion at stations and interchanges, as well as the impacts on bus reliability and journey times. None of the models have been 'rigorously assured by TfL' on a policy basis as mentioned in the transport topic paper [E3.5].

We are also concerned that impacts on the wider bus and rail networks beyond the borough have not been robustly assessed including the impacts at interchanges and at known points of congestion closer to central London.

Q5.9: What strategic transport issues have been identified that would require mitigation to enable the scale of growth envisaged to be delivered?

The main strategic transport issues identified for Green Belt sites of Chase Park and Crews Hill are that as currently proposed these are likely to result in low density car dependent development. Since these are remote locations in areas of poor public transport access, it will result in increased traffic as well as not able to support investment in transport improvements. These proposals will need to be modified to require optimised densities and restrained car parking. Significant upfront investment is needed in the public transport network (rail, London Underground, London Overground and buses), as well as new road links, and reallocation of road space to bus priority, cycling and walking. This can mitigate capacity constraints, crowding on the public transport network, and avoid car dominance.

Alternatively, locations that are already well connected such as around Piccadilly line stations of Oakwood and Cockfosters should be considered first to enable higher densities that can further support investment in public transport and active travel.

Q5. I0: What transport infrastructure, or other mitigation schemes, have been identified that would address these transport issues? Has the likely effectiveness of proposed transport mitigation schemes been assessed?

No - The Strategic Transport Assessment, specifically for Chase Park and Crews Hill sites, does not identify specific measures that would mitigate the impact on the public transport and active travel networks nor assess their effectiveness. For instance, the impact of bus service changes to serve Chase Park and Crews Hill on the wider bus network need to be properly assessed considering impacts on journey time disbenefits for existing passengers. These assessments are needed to identify the most appropriate bus services that can mitigate these impacts.

The emerging Infrastructure Delivery Plan (published 30 September 2024) identifies measures that would be needed to serve released green belt areas of Chase Park and Crews Hill, but the effectiveness of these measures has not been assessed. In the emerging IDP, a number of 'essential' mitigation requirements such as public transport provision and active travel are classified as 'important' or 'desirable'; this undermines both the principle of sustainable development and the stated aim of achieving 75 per cent sustainable mode share. There is a need for continuous, high quality active travel routes that extend beyond Chase Park and Crews Hill to connect the sites to transport interchanges, town centres and other key destinations. These connections are particularly important because there is no established network of routes to build on as there would be in urban placemaking areas.

Premising Green Belt release by following London Plan maximum parking standards of 1.5 car spaces per dwelling units for PTAL 0-1 is not appropriate, does not make the best use of land, does not set exemplary standards of appropriate development that necessitates Green Belt release and does not align with the ambition of achieving

75 per cent mode share. The draft Local Plan policy is using a London Plan parking standard in a way that was unintended. The policy states that car free or car lite development should be the starting point for proposals. The higher allowance for PTAL 0-1 recognises and responds to the relatively limited circumstances in which development of modest scales takes place in less well connected locations. Very large-scale development is not generally appropriate in these locations because they are not well served by public transport and future occupiers are therefore more likely to rely on private vehicles. This approach should also apply in the green belt and for this reason the proposals for Crews Hill and Chase Park in the draft Local Plan are not considered to be the right approach as their transport impacts cannot be mitigated.

One of the most important mitigation measures should be a commitment to limit car parking (below maximum London Plan standards) within the placemaking areas of Chase Park and Crews Hill to ensure that mode share targets can be met and that provision of high quality public transport can be viable in the long-term.

Q5.11: Are there any outstanding concerns on transport matters from Transport for London, National Highways or any other relevant transport authorities?

Yes. In summary, our concerns raised in the Regulation 19 representations have not been addressed. The Statement of Common Ground (SoCG) details the outstanding issues which remain unresolved.

We continue to have significant concerns about the ability of the rural placemaking areas at Crews Hill and Chase Park to deliver genuinely sustainable neighbourhoods that would offer a genuine choice of transport modes are not car dependent. The areas identified are not well connected by public transport compared to the urban placemaking areas and would require substantial investment in transport infrastructure and services, more urban typologies and densities than are currently proposed and a restraint based approach to car parking to deliver sustainable neighbourhoods. In this respect, we suggest that an alternative wider Chase Park area is considered as

indicated within the answers to Q 1.1 in Matter 1, Q 4.5 and 4.6 in Matter 4 and referenced above in Q 5.2.

We remain concerned about the feasibility and viability of the infrastructure required to make these sites 'work'. Our concerns relating to the IDP being unsound, as identified within this Matter statement, SoCG, and Regulation 19 consultation response, remain. As indicated within Matter 1, Q 1.1, further collaboration and agreement is critical. In relation to Chase Park, we remain of the view that alternative approaches that deliver many more homes for the amount of Green Belt released would enable the necessary investment in public transport infrastructure.

Without sufficient safeguards and commitments in the Local Plan (as identified in Matter 1, Q 1.2), development is likely to come forward in a piecemeal manner without the essential transport infrastructure and services being embedded from the outset. This is likely to lock in car ownership, use and dependency. This probability of piecemeal development is further exacerbated by the division of the placemaking areas into discrete site allocations which are likely to hinder comprehensive infrastructure planning.

It is also unclear how the speculative planning applications could be refused for smaller sites within the placemaking areas which are not proposed to provide essential transport infrastructure or services once the principle of development has been accepted through the Local Plan. Given the absence of a delivery vehicle to coordinate development, coupled with resource constraints within Enfield Council (and in the case of Crews Hill, complex land ownership), it is likely that sub-optimal development proposals will be put forward.

If the sites are to be taken forward in some form through the Local Plan process, it is essential for substantial amendments to be made to SS1, PL10, PL11 and for individual site allocations to be brought into a single site allocation with the following policies applied:

- Mode share targets within the relevant strategic policies and site allocations for both areas, with measures identified to ensure those targets are met.

- A requirement to limit car parking to well below London Plan maximum standards across the placemaking areas to both demonstrate a strategic approach to Green Belt release and avoid car dominated development.
- Minimum densities and building heights (in areas that are released) that can enable sustainable development based primarily around active travel and public transport use.
- The development of cost effective and viable bus and active travel networks to match the standards that would be expected of urban development in London through joint working with TfL.
- A coordinated approach which avoids piecemeal development with a credible delivery body that could oversee infrastructure delivery and ensure these commitments are met.

Other Matters

Q5. I2: Is the spatial strategy and scale of growth justified and consistent with national policy in respect of the effect on air quality?

Current proposals for development of the Placemaking Areas of Chase Park and Crews Hill are likely to lead to car dependent development resulting in higher emissions (both during construction and in resulting travel by occupants and visitors) than would be the case with development that was based around active travel and public transport. This will negatively impact air quality.

Q5. I3: Is the Plan effective in ensuring adequate provision of infrastructure and local services to deliver the spatial strategy, in particular those relating to education, health and green infrastructure?

Q5. I4: Does the evidence on whole plan viability and infrastructure demonstrate that the spatial strategy can viably deliver the housing, employment floorspace and infrastructure required to support the growth proposed?

No. As indicated in Matter 4, Q4.2, we recognise that the Plan is supported by a high level viability assessment, which includes assessment of the Green Belt sites of Chase Park and Crews Hill. As evident from the emerging Infrastructure Delivery Plan (published 30

September 2024), the substantial costs of providing substantial transport infrastructure, active travel provision, and other services have not been considered which are essential to make the Green Belt genuinely sustainable as per the vision. A thorough consideration of these costs may further affect the viability of the Green Belt sites (especially Crews Hill) to provide family affordable housing, especially considering the low density car dependent development being proposed through the spatial frameworks for these placemaking areas.

For the Green Belt sites of Crews Hill and Chase Park, we expect a robust viability assessment underpinned by a costed and funded Infrastructure Delivery Plan as part of a formal statutory planning mechanism to allow for a framework and opportunity for collaboration.

Issue 5.5: Whether the allocations in the Plan have been selected using an appropriate methodology based on proportionate evidence.

Q5.20: Is the approach to the assessment and selection of sites, as set out in the Site Allocations Topic Paper justified? Does the submitted evidence demonstrate that the sites have been selected on a robust, consistent and objective basis?

No - Based on table 3 in the Site Allocations Topic paper (pasted below) and our comments throughout our engagement in the local plan process on the remoteness of both Chase Park and Crews Hill, our interpretation of this table is that Chase Park and Crews Hill as a whole and site allocations within them should have been classed as isolated rather than accessible Green Belt locations. This remains the case even when the highest PTAL is used—which for these sites ranges from PTAL 0-1. This would make them category 7 or 8 – no allocation unless exceptional circumstances. Based on this, the Chase Park and Crews Hill sites should have been ruled out by the criteria used in stage 2 of site selection (Table 1 of the Site Allocations Topic Paper pasted below). Our understanding is that these allocations have been justified in appendix 2 table 07. We query how this process is ‘robust, consistent and objective’.

Table 3: Prioritisation of sites by category

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| Priority | Broad Site location | Site typology | Approach to Allocation |
|----------|-----------------------------|---|--|
| 1 | Sites within the urban area | Brownfield sites in urban area | Allocation, subject to other stages |
| 2 | | Greenfield sites in urban area | Allocation, subject to other stages |
| 3 | Accessible Green Belt sites | Brownfield sites in accessible ²⁸ Green Belt location | Potential allocation possible, subject to alignment with emerging spatial strategy |
| 4 | | Greenfield sites in accessible, lower performing Green Belt location | Potential allocation less likely, unless exceptional circumstances |
| 5 | | Greenfield in accessible, moderately performing Green Belt location | Potential allocation less likely, unless exceptional circumstances |
| 6 | | Greenfield in accessible, high performing Green Belt location | Potential allocation less likely, unless exceptional circumstances |
| 7 | Isolated Green Belt Sites | Brownfield in isolated Green Belt location | No allocation unless exceptional circumstances |
| 8 | | Greenfield in isolated low or moderately performing Green Belt location | No allocation unless exceptional circumstances |

²⁸ Accessibility will be determined by the Public Transport Accessibility Level (PTAL) of sites

Table 1: Site Assessment Process

| Site Assessment Process Overview | |
|--|---|
| Stage 1: Identification and initial sift of sites | <ul style="list-style-type: none"> • Stage 1a: Identification of sites • Stage 1b: Assessment of absolute constraints • Stage 1c: Size threshold (25 homes+ or 0.25ha / 500sqm or 0.25ha) |
| Stage 2: Promoting a Sustainable Pattern of Development | <ul style="list-style-type: none"> • Stage 2: Sites considered on a sequential approach directing growth to specific locations, based on the overall hierarchy which: <ul style="list-style-type: none"> • Prioritises land in the urban area, then • Prioritises the most accessible sites in the Green Belt (considering previously developed land first before considering greenfield sites in the Green Belt, starting with the lowest performing against the Green Belt purposes), then • Prioritises the least accessible isolated land in the Green Belt (considering previously developed land first). |
| Stage 3: Detailed Planning Assessment | <ul style="list-style-type: none"> • Stage 3a: Consideration of technical constraints (e.g. highways) • Stage 3b: Consideration of other non-absolute constraints (e.g. historic/ecological etc.) |
| Stage 4: Integrated Impact Assessment | <ul style="list-style-type: none"> • Stage 4: Identify any significant negative effects that may require mitigation if site is put forward for allocation |
| Stage 5: Deliverability | <ul style="list-style-type: none"> • Stage 5: Does the evidence indicate that the site could be delivered within the plan period? |
| Stage 6: Overall Conclusion | <ul style="list-style-type: none"> • Stage 6: Identification of preferred site allocations. |

Irrespective of this, and as indicated in our responses to several questions in Matters 1, 4 and 5, given the scale of growth needed to increase the pipeline for London to 88,000 homes per year, ensuring opportunities to deliver this in a timely way are not undermined and for the Enfield Local Plan to follow through on their vision and objectives, it is essential to make the best use of land in releasing these Green Belt sites. This necessitates critical safeguards in local plan policies and planning mechanisms established for extended Chase Park and Crews Hill as identified in Matter 1, Q 1.2.

Q5.22: Paragraphs 4.5 and 4.6 of the Site Selection Methodology paper refer to sites that fell within priorities 1 and 2 being generally considered suitable for development, but with some exceptions, and sites that fell within priority 7 and 8 were generally considered unsuitable but with some exceptions. On

what basis were the 'exceptions' justified and is it clear which sites fall into which category?

See Q 5.20

Q5.23: Are the reasons for selecting some sites and rejecting others clearly set out and justified?

See Q 5.20

Q5.24: Were constraints to development, such as transport, flooding, landscape character, heritage and mineral safeguarding appropriately taken into account as part of the selection process?

No – Transport was only assessed in terms of PTAL which measures access to the public transport network. PTAL is primarily intended for use within urban areas with a network of public transport services and active travel routes to connect with them. It does not measure transport capacity, nor does it provide a measure of access to essential services such as schools, shops and medical facilities by walking, wheeling and cycling. These should be key considerations when selecting major development sites, particularly established urban areas. As a result, the location of Crews Hill rail station raises the PTAL in its immediate surroundings despite it being isolated. As such, it provides limited active travel or public transport connections to essential services necessary for sustainable development. The important factors of access to services and transport capacity do not appear to have carried weight in the selection process. A reliance on PTAL as the sole transport measure may have elevated consideration of Crews Hill despite its location. Only a small area of Chase Park benefits from existing active travel and public transport links and most of the area is isolated similar to Crews Hill. The challenges in providing transport infrastructure to these areas with virtually no existing network have not been considered and have enabled isolated sites to emerge from the selection process.

As indicated earlier in responses to several questions in Matter 1, 4, and 5, further work is needed. Alternate sustainable approaches are possible to the current proposals of Green Belt release as illustrated

through extended Chase Park area that could result in greater number homes with existing transport infrastructure.

Issue 5.6: Whether Policy SS2 is justified, effective, consistent with national policy and in general conformity with the London Plan

Q2.30: Is the Plan clear as to when masterplans or planning briefs must be prepared and the mechanism by which they would be approved?

No. There appears to be confusion about the terms used. In part 3 there is reference to development in the placemaking areas being guided by Supplementary Planning Documents (SPD), Area Investment Plans, Masterplans and/or planning briefs. It further states that 'For the Crews Hill and Chase Park placemaking areas, comprehensive masterplans must be prepared and approved in advance of development.' SS1 part 12 and PL11 both confirm that for Crews Hill this will take the form of an SPD (which would be subject to consultation) but PL10 places no such requirement on Chase Park. This means that Chase Park could come forward through masterplans and planning briefs prepared by the developers with minimal consultation with infrastructure providers like TfL. There appears to be no formal consultation or approval process with key stakeholders set out. However, in E3.5 Transport topic paper submitted on 1 November, Table 5-2 commits to the preparation of SPDs for both Crews Hill and Chase Park. It is essential that, as a minimum, SPDs should be prepared for both Chase Park and Crews Hill, and preferably a mechanism is used that allows for independent scrutiny such as through an Area Action Plan or subsequent Supplementary Plans. Please refer to Matter 1, Q1.2.

Q2.31: How would Policy SS2 be used in decision making? Are matters covered addressed in more detail in other policies in the Plan? Are there any parts of Policy SS2 that are not addressed by other policies?

This is unclear. PL10 does not require anything more than a coordinated masterplan for Chase Park. See response to Q2.30.