

# Transport for London

## Written Statement on Matter I

### Legal, procedural and other general matters

#### Issue I.1 – Duty to Cooperate

Q1.1: Has the Council maximised the effectiveness of the Plan by engaging constructively, actively and on an on-going basis with neighbouring authorities and the other prescribed bodies on the relevant strategic matters and what form has this engagement taken?

We have appreciated the Council's commitment for collaboration and engagement and we want to highlight extensive and well documented engagement on the highways modelling work that informed the Strategic Transport Assessment.

However, these modelling discussions do not address our fundamental concerns relating to the proposed frameworks and policies within Chase Park and Crews Hill. These are likely to result in low-density and car dependent development. Through the Statement of Common Ground (SoCG) we have suggested changes that can satisfy some of our concerns. We hope that these will be taken forward as part of proposed modifications.

We recognise that there have been very significant changes to national policy and London's cumulative Local Housing Need (LHN) figures over the period when LB Enfield have been in the late stages of plan-making. We note that they are able to rely on transitional arrangements in the NPPF and the plan to be examined under the old NPPF. We believe that under the old NPPF, these green belt sites should not be released.

However, we would like to work positively with LB Enfield towards the provisions of the new NPPF and LHN with a view to a significant development focussed on Chase Park to deliver between 10,000 and 12,000 homes and necessary infrastructure. Release of green belt sites as set out in the draft Local Plan would represent a significant opportunity loss and under-optimisation.

We believe further work and engagement is needed to ensure these sustainable patterns of development, supported by adequate transport infrastructure with optimised densities. The optimised densities and restrained car parking in turn will support infrastructure needed by providing critical mass for bus patronage to support the operating costs and planning obligations needed to support the capital costs of infrastructure. This is needed to align with London Plan Good Growth objectives and the new NPPF paragraph 148.

To enable a strategic approach for both placemaking areas, a structured and statutory planning mechanism is necessary to allow the framework, time and opportunity for adequate public consultation and coordination to develop and realise this opportunity and start building the pipeline towards 88,000 homes per year for London. This is particularly necessary given that there has been limited interaction with TfL to resolve key policy concerns articulated in our Regulation 19 response or seek input and agreement on the emerging Infrastructure Delivery Plan published on 30 September 2024.

This work would also include locations that are much better connected (see Figure 1 below) and would remove the need for substantial transport investment upfront, especially along the Piccadilly line at Oakwood and Cockfosters stations which have frequent train services. This can address the family and affordable housing need that Enfield has articulated as exceptional circumstances for release of Green Belt. An initial assessment of the outcome of including these sites is presented in Matter 4. Some figures and summary table are included here as well.

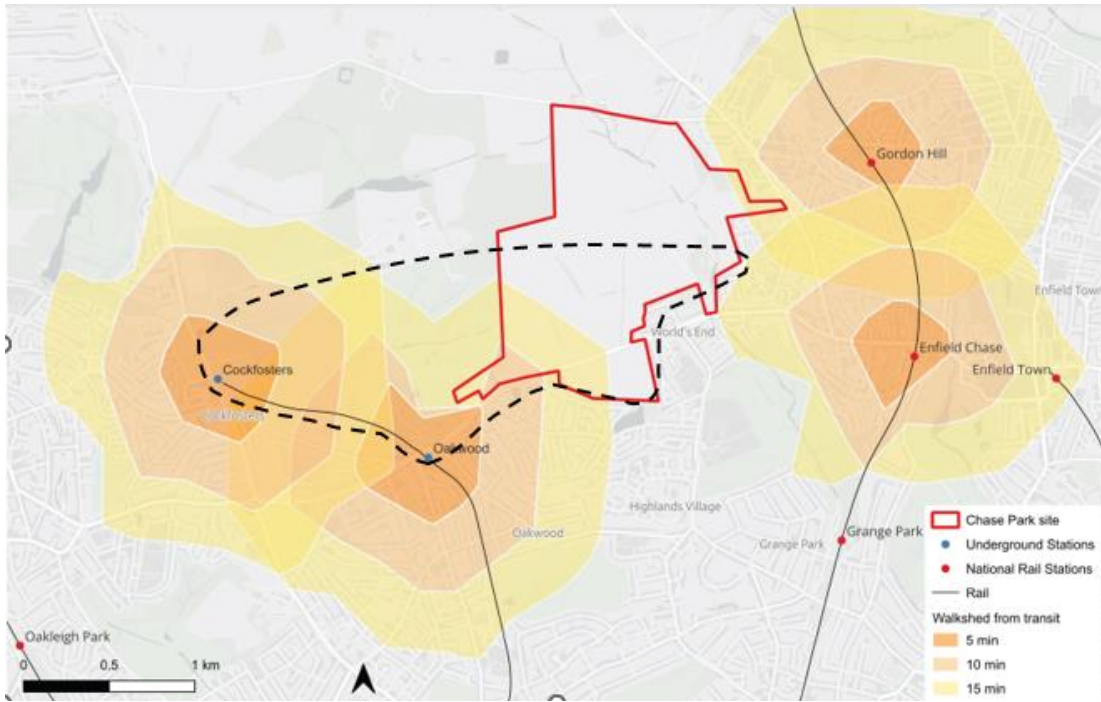


Figure 1: Walk catchments of 5-15 minutes around Oakwood and Cockfosters stations which are west of current Chase Park red line boundary

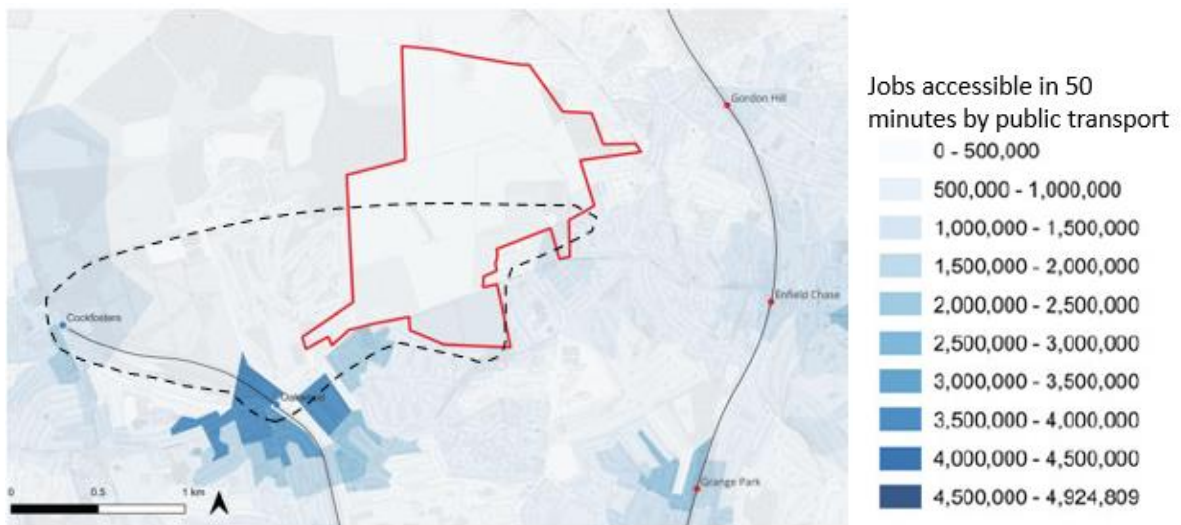


Figure 2: Access to jobs by public transport in 50 minutes



Figure 3: Land ownership

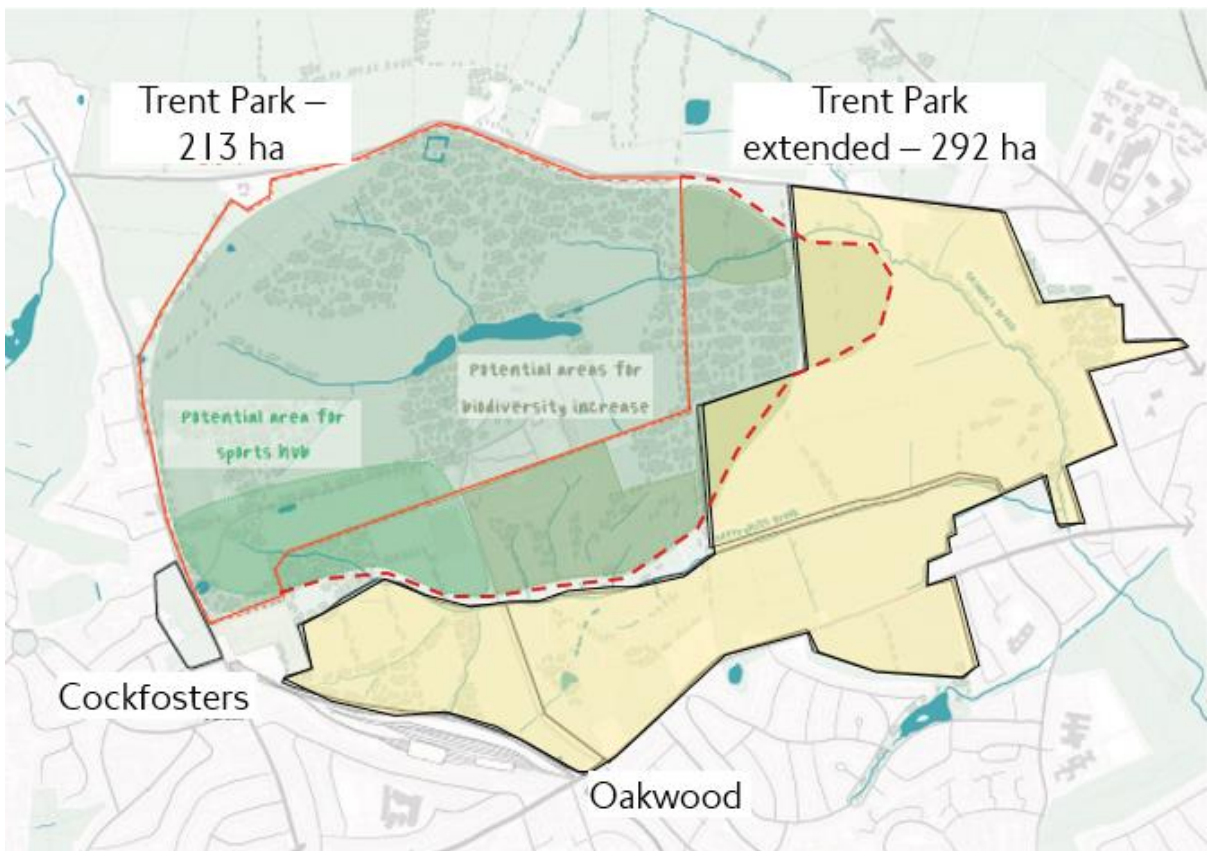


Figure 4: Potential area of Green Belt and development considering land near Oakwood and Cockfosters stations



Figure 5: Indicative potential development plots

	Proposed illustrative scenario	Draft Local Plan (Chase Park only)
Total Green Belt release land area (hectares)	231	167
Developable area (hectares)	97	68
Gross Densities (du/ha)	~47	~22
Density within developable area (du/ha)	108	55.7
Total homes with ≥70% family homes	10,501 (75%)	3,765 (70%)
Total family homes	7905	2636
Accessible open space	139 ha	99ha

Table 1: Potential number of homes and family homes from the above scenario

Q1.2: What outcomes have resulted from engagement and cooperation on relevant strategic matters and how have these informed the Plan’s policies, including but not limited to:

b) Infrastructure g) Transport

Through SoCG interactions, we have made the following suggestions for safeguards to be included within policy to address our concerns. We hope these are included as proposed modifications and appropriate public consultation/examination is required.

1. A commitment to 75 per cent mode share target for both Crews Hill and Chase Park. Currently, it is only mentioned for Chase Park.
2. An alternative plan-making mechanism for development to delivery between 10,000 and 12,000 homes at Chase Park (extended boundary including Piccadilly line stations) without which no developments should come forward in a piecemeal manner.
3. Refocussing development at Crews Hill on previously developed land and land near the station through a mechanism that ensures car parking restraint and optimises viable sustainable transport options, without which no developments should come forward in a piecemeal manner.
4. A commitment that this is supported by a robust and detailed viability assessment and Infrastructure Delivery Plan with adequate phasing plan that is prepared in collaboration and agreement with TfL.
5. The following policy approaches should be included within the local plan:
  - a. represent the areas as single site allocations to affirm the coordinated approach and discourage piecemeal developments
  - b. optimised densities across the areas to make best use of land and provide sufficient densities to make viable the provision of public transport
  - c. minimum building heights
  - d. maximum parking standards set at a low enough level to support the provision of public transport and ensure sustainable travel behaviours
  - e. a commitment to delivering a comprehensive local active travel network
  - f. a commitment to developing and delivering a comprehensive bus strategy

Through our continued engagement with the Council and through our Regulation 19 representations, we have identified a need for more collaboration on policy discussions and on preparation of a robust IDP with indicative costs and timescales to be incorporated in further

updates to the IDP. We have outlined some specific issues with the emerging IDP (published on 30 September 2024) in the Appendix 3 of the updated SoCG (not yet submitted) which indicate what we perceive as misrepresentations of TfL's position. The Council has agreed to adequately engage with TfL to coordinate and agree further updates to the IDP. As it currently stands (30<sup>th</sup> Sept 2024 version), we are not confident that this IDP can support the vision and strategic objectives of the Local Plan in relation to placemaking areas of Crews Hill and Chase Park.

Q1.3: Is the process of cooperation demonstrated with clear evidence, including SoCG as expected by NPPF paragraph 27 and the Planning Practice Guidance (PPG)? Do SoCG identify relevant strategic matters, actions in relation to cross boundary issues, and the outcomes of actions taken?

No. Given the short space of time between the close of the Regulation 19 consultation in May 2024 and submission for Examination in August 2024, there was not sufficient time to prepare a detailed SoCG. An interim SoCG was signed to be followed with a detailed statement addressing our concerns before the examination hearings. Whilst noting successive governments' desire to speed up plan-making, and TfL's role as a statutory consultee, we think the Council has had limited time to allow for adequate engagement needed to work through our concerns. Therefore, we have made recommendations within the updated SoCG (not yet submitted) and the written statements to be considered through the examination and incorporated as proposed modifications.

The modelling discussions with Enfield's consultants were characterised as strategic discussions in the Duty to Cooperate statement, with which we disagree. TfL's key policy concerns were not addressed through conversations about modelling inputs. However, the Council has made a commitment to work with TfL to meet our aligned objectives of making the best use of land (with optimised densities) that results in less need to travel and a high sustainable mode share. As the examination process will not allow sufficient time, it is critical to consider a planning mechanism that allows for further coordination for placemaking areas of Chase Park and Crews Hill.

Q1.4: Are there any strategic matters, as defined by the legislation, which have not been specifically addressed through the DtC?

Yes – see response to Q1.1-1.3 and Q1.5

Q1.5: Are there any outstanding concerns from adjoining authorities or other DtC bodies regarding the DtC itself, or the strategic matters identified? If so, how has the Council sought to address any issues raised?

Yes - There are still outstanding concerns regarding strategic policies as identified in Q1.1-1.3 and outstanding matters regarding the strategic transport measures necessary for sustainable development of the placemaking areas of Chase Park and Crews Hill. These have not yet been dealt with under the Duty to Cooperate.

Q1.6: In overall terms, is there evidence to demonstrate that, during the preparation of the Plan, the Council has engaged constructively, actively and on an on-going basis with relevant authorities and prescribed bodies on relevant strategic matters? Has the Duty to Cooperate been met in a manner consistent with paragraphs 24 - 27 of the NPPF?

Although there has been extensive engagement on transport modelling with TfL Strategic modelling colleagues, joint working on TfL's objections to the Local Plan has been lacking thus far, not aligning with Paragraph 26 of the NPPF which states, '...In particular, joint working should help to determine where additional infrastructure is necessary...'. This applies to policy and infrastructure aspects related to the placemaking areas of Chase Park and Crews Hill as indicated in Q1.1-1.3. The Council has, however, been forthcoming with a commitment to collaborate further. As such (and as indicated in Q1.3 second paragraph), a statutory planning mechanism is needed that provides a framework for collaboration and consultation.

It is also noted that active and constructive dialogue needs to continue to respond to and address the significant impact of the new national context from December 2024, and that this needs to be facilitated through a pragmatic and responsive examination process.