

## E7.8 LBE and TfL's responses to Enfield Local Plan Publication Draft consultation

8 January 2025

**Table 1: Partial breakdown of TfL's response to the Enfield Local Plan Publication Draft consultation and LBE's response to these clarifications to Policies**

Ref	Section	TfL's comments at Reg-18 stage 2021	TfL's comments at Reg-19 stage May 2024	Enfield's Response to TfL's comments June-September	TfL's response October-November 2024	Enfield's Response November-December 2024	TfL response	Enfield's Responses 18-Dec-8 Jan
1.	2.1.3/2.3	The description of rail services needs to be reworded to make it clearer to the reader including reference to London Overground services and figure 2.1.	Although the wording has been changed, the description could still be a lot clearer. It should include reference to London Overground services and clarify that there are no station capacity improvements proposed for stations on the Piccadilly line.	Noted	We would like these points to be addressed through proposed minor modifications.	<p>Enfield Council proposes the following minor modifications to address TfL's points:</p> <p><b>Clarity of Rail Service Descriptions:</b> LBE will further refine the wording to provide a clearer, more comprehensive description of rail services. This will explicitly reference London Overground services, enhancing readability and ensuring accuracy.</p> <p><b>Piccadilly Line Station Capacity:</b> LBE will clarify within the relevant section that there are no planned station capacity improvements for stations on the Piccadilly line as part of this Plan.</p> <p>These modifications addresses TfL's concerns and improve the accessibility and accuracy of the document for all readers.</p>	Agreed	<p>Enfield Council suggests modifications are proposed in the Modifications Schedule [E6] included into the following sections of the ELP:</p> <p><b>Chapter 9:</b> Transport and Connectivity – this chapter discusses the borough's transport infrastructure and future plans. Incorporating the modifications here would provide clarity on current rail services and planned improvements.</p> <p><b>Appendix D:</b> Infrastructure Delivery Plan - this appendix outlines planned infrastructure projects. Including the clarification about the Piccadilly Line station capacity here would inform stakeholders about the scope of planned transport infrastructure improvements.</p>
2.	SSI - Spatial Strategy	N/A	Part 6 of the policy states that 'A large proportion of the Borough's future development needs will be provided by the four main placemaking areas, these include: the regeneration and intensification at Meridian Water (PL5) and Southbury (PL6), an urban extension Chase Park (PLI0) and a new settlement at Crews Hill (PLII). These will be accessible by high frequency sustainable modes of transport with integrated active travel initiatives, to link to existing communities and places of work.' While TfL supports	LBE will continue to work with TfL throughout the examination process and the development of Supplementary Planning Documents for the areas of Crews Hill (PLII) and Chase Park (PLI0) to resolve any outstanding issues/concerns. Further detail on the strategy to provide high frequency sustainable modes of transport to these areas have since been discussed between LBE and TfL bus colleagues. The updated Infrastructure Development Plan (IDP) published 30 September 2024 contains details of	<p>While we note the updated IDP published on Enfield's website on 30 September 2024, TfL <u>was not</u> consulted on it prior to its publication. Our significant concerns - as stated in our Regulation 19 representations - regarding the remoteness of Crews Hill and the lack of a robust strategy for delivery of sustainable modes of transport for both Chase Park and Crews Hill remain.</p> <p>Our view is that further work is needed to address our concerns.</p>	<p>LBE appreciates TfL's emphasis on ensuring the provision of sustainable transport infrastructure and recognise their concerns about the remoteness of these sites, the need for robust strategies for public transport delivery, and achieving a high sustainable mode share. LBE acknowledge the value of collaboration and agree that addressing transport infrastructure comprehensively is critical for the successful development of these areas.</p>	<p>We welcome the Council's commitment to engage with TfL to address outstanding issues.</p> <p><b>Consultation and Coordination with TfL on the IDP:</b> We welcome Council's commitment to engage with TfL and develop further updates to the IDP in a transparent manner. We disagree that the current IDP correctly reflects the outcomes of the discussions with TfL bus colleagues. See Appendix C for details.</p> <p><b>Categorisation of Transport Infrastructure:</b> We welcome</p>	<p>The Council remains committed to engaging with TfL and will continue to update the IDP to reflect ongoing discussions. The IDP is a live document and will evolve through ongoing dialogue, but we are confident that it currently provides a robust reflection of the discussions to date.</p> <p>We agree that public transport and active travel infrastructure should be categorised as essential, and we are reviewing how this can be reflected more</p>

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			regeneration and intensification at Meridian Water (PL5) and Southbury (PL6) we do not believe that it will be possible to provide 'high frequency sustainable modes of transport' 'to serve the urban extension Chase Park (PLI0) or the new settlement at Crews Hill (PLII). The remoteness from existing public transport, the lack of active travel connections and the very high costs of providing a level of public transport service comparable to urban areas of the borough will result in these areas being car dependent from the outset, contrary to national, regional and local planning objectives. See comments on PLI0 and PLII for more details.	infrastructure requirements for both PLII and PLI0 in line with latest discussions.	<p>Considering the Council's ambition for the two green belt sites and the extent of bus infrastructure needed, the Council should produce a comprehensive bus strategy in coordination and agreement with TfL and Hertfordshire Council. While the IDP includes references to bus routes, extensions and frequencies, these <u>have not been agreed</u> with TfL which would be the transport operator. This negates the value and relevance of the current IDP.</p> <p>In addition, we consider that the vision to achieve 75 per cent sustainable mode share is unrealistic given that LBE has set out that public transport service provision and active travel infrastructure for the two placemaking areas of Chase Park and Crews Hill are not considered 'essential'. Public transport service provision and active travel infrastructure (including new bus stops, new bus facilities, new bus route pump priming, new walking and cycling routes within the development, upgraded walking and cycling routes beyond the development and new footbridges and cycle links) must be categorised as essential infrastructure rather than 'important' or 'desirable' in the IDP for this to be considered a realistic aim.</p> <p>To ensure that the Plan is sound and can be delivered, the IDP should include indicative costs and timescales for the proposed public transport services and infrastructure that need to be agreed with TfL and ensure that these can be met through section 106 and CIL as indicated in the IDP.</p>	<p><b>Consultation and Coordination with TfL on the IDP:</b> LBE notes TfL's concerns regarding the timing of the publication of the updated IDP on 30 September 2024 without prior consultation. While this document reflects the outcomes of our discussions with TfL bus colleagues and outlines the infrastructure requirements for Crews Hill and Chase Park, LBE is committed to ongoing dialogue to refine and agree on these elements. LBE proposes additional sessions with TfL to ensure that any remaining issues are addressed comprehensively, leading to mutually agreed-upon strategies for public transport provision.</p> <p><b>Categorisation of Transport Infrastructure:</b> LBE acknowledges the importance of aligning infrastructure categorisation within the IDP with the overarching goals for sustainable development. LBE remain committed to exploring mechanisms that will prioritise public transport service provision and active travel infrastructure as essential components, recognising their pivotal role in achieving our sustainability objectives. This commitment includes ongoing assessment and adjustments as further detailed information and cost estimates become available through our partnership with TfL and other stakeholders.</p> <p><b>Funding and Delivery Mechanisms:</b> While it is correct that the delivery of infrastructure is largely reliant on CIL and Section 106 obligations, LBE is actively exploring innovative funding solutions and partnerships to bridge any potential gaps. This</p>	<p>Council's commitment to categorising public transport and active travel infrastructure as essential and would like to see that reflected in the documents.</p> <p><b>Funding and Delivery Mechanisms:</b> Noted. Some concrete ideas on funding solutions beyond CIL and s106 as well overall indicative costs and timescales should be incorporated within further updates to the IDP.</p> <p><b>Achieving Sustainable Mode Share and Meeting NPPF Requirements:</b> We welcome the Council's commitment to sustainable mode share, but we would like to see this and restrained car parking reflected appropriately within policies and IDP.</p> <p><b>SPDs vs. AAPs:</b> We appreciate Council's commitment to master planned approach for Green Belt sites. However, without adequate safeguards in the Local Plan, policies for the placemaking areas (Crews Hill and Chase Park) there is a risk of relatively low density car-dependent development as currently proposed within the spatial frameworks. This does not align with the Good Growth objectives of the London Plan and sustainable locations policies within the NPPF proposals.</p> <p>A structured and statutory process is necessary to allow the time and framework for proper coordination to develop and comprehensively review proposals for Green Belt sites, especially 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 for Infrastructure Delivery Plan.</p>	<p>explicitly in the Local Plan and supporting documents.</p> <p>The Council recognises the importance of exploring a range of funding solutions. While mechanisms such as CIL and s106 remain primary tools, we are open to working collaboratively with TfL to explore alternative funding options and indicative costs. This will be incorporated in future updates to the IDP.</p> <p>The Council fully supports the principle of sustainable mode share. However, we maintain that policies and associated parking strategies must reflect the realities of Enfield as an outer London borough.</p> <p><b>SPDs vs. AAPs:</b> LBE acknowledges TfL's feedback and remains committed to ensuring comprehensive planning and stakeholder engagement for both Crews Hill and Chase Park.</p> <p><b>Commitment to SPDs</b> LBE agrees in principle to the preparation of a Supplementary Planning Document (SPD) for Chase Park, recognising the framework that a statutory SPD provides for coordinated planning and public consultation. This aligns with the Council's commitment to robust and transparent stakeholder engagement.</p> <p><b>Differentiated Approach</b> However, LBE reiterates that the distinct characteristics of Chase Park and Crews Hill justify a tailored approach. The consolidated land ownership and unique development context of Chase Park make a Council-led masterplan the preferred mechanism to deliver</p>

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					<p>As per the IDP, delivery of all infrastructure, including transport, is largely reliant upon CIL or s106 planning obligations which may not be available/sufficient to fund essential transport infrastructure and services upfront.</p> <p>Paragraph 74 and paragraph 109 of the NPPF as cited below focus any significant development offering genuine choice of transport modes. Without provision of genuine choice of transport modes upfront, mode share targets are unlikely to be met.</p> <p>NPPF para 74: <i>The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities (including a genuine choice of transport modes). Working with the support of their communities, and with other authorities if appropriate, strategic policy-making authorities should identify suitable locations for such development where this can help to meet identified needs in a sustainable way.</i></p> <p>NPPF para 109: <i>The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.</i></p> <p>Development of the placemaking areas without</p>	<p>may include public-private partnerships, external funding opportunities, and further prioritisation of critical infrastructure investments to ensure the upfront delivery of sustainable transport options.</p> <p><b>Achieving Sustainable Mode Share and Meeting NPPF Requirements:</b> LBE recognise that genuine choice of transport modes is essential, as highlighted by NPPF paragraphs 74 and 109. To this end, LBE is committed to working collaboratively with TfL to ensure that key infrastructure elements are planned and delivered in a timely manner, supporting the development of Crews Hill and Chase Park as sustainable communities. This includes further enhancements to active travel connections and sustainable transport options within and beyond the sites.</p> <p><b>SPDs vs. AAPs:</b> LBE remains steadfast in its commitment to developing Supplementary Planning Documents (SPDs) for Crews Hill and a masterplan for Chase Park, as outlined in the Local Plan. SPDs provide the flexibility needed to adapt to evolving circumstances, facilitate targeted stakeholder engagement, and deliver place-specific guidance efficiently. While LBE appreciates the suggestion of Area Action Plans (AAPs), LBE believes that our approach, supported by ongoing coordination with TfL and other stakeholders, can achieve the desired outcomes without the need for formal Development Plan Documents (DPDs). LBE remain open to refining our approach through collaborative engagement to ensure</p>	<p>If not AAPs, we will still request that the Council considers SPDs for both Chase Park and Crews Hill, so there is an opportunity for statutory public consultation. This commitment was verbally agreed in DtC meetings and has been mentioned in several places in the transport topic paper [E3.5], specifically Table 5-2 – TfL Outstanding and Ongoing Matters.</p>	<p>strategic and sustainable growth.</p> <p>We believe that a masterplan offers the flexibility required to address site-specific challenges while providing a coordinated and robust planning framework. Nevertheless, we are open to including a commitment to an SPD for Chase Park within the Inspector's consideration as part of the examination process. The Council also want to facilitate delivery as part of an overall housing trajectory, and we consider the approaches to be effective and efficient. To require an AAP would introduce extra time/delay to securing actual delivery.</p> <p><b>Stakeholder Engagement and Collaboration</b> LBE remains committed to engaging with stakeholders, including TfL, throughout the planning process for both Crews Hill and Chase Park. Should the Inspector determine that an SPD for Chase Park is required, the Council will work collaboratively to ensure its successful delivery.</p>

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					<p>sufficient public transport, a restrained approach to car parking, and optimised densities, would fail to both deliver Good Growth or make the best use of land as required by the London Plan.</p> <p>The Council may want to consider committing to producing an Area Action Plan in conjunction with the GLA and TfL for both Crews Hill and Chase Park to enable much needed work, coordination, agreements on infrastructure, and scrutiny so exemplary development occurs on these green belt sites.</p>	exemplary development on these green belt sites.		
3.	continued	continued	<p>Part 12 of the policy states that 'For placemaking areas: PL10: Chase Park and PL11: Crews Hill, development will not be supported until a masterplan for those areas has been prepared and agreed by the Council, in the case of Crews Hill, through preparation of a Supplementary Planning Document or similar subsequent planning mechanism).' If placemaking areas PL10 and PL11 were to be taken forward for development and notwithstanding TfL's views on their suitability in terms of sustainable transport, it will be essential that a Supplementary Planning Document which is subject to consultation with stakeholders is prepared for both areas because of the lack of detail on specific infrastructure requirements, transport provision, site layout, densities, phasing, delivery and mitigation in policies PL10 and PL11 and the individual site allocations.</p>	Noted	<p>To address this point PL10 will need to be amended to confirm that development at Chase Park will be taken forward through an SPD or an AAP.</p> <p>The text in part 12 should be amended as follows: <i>For placemaking areas: PL10: Chase Park and PL11: Crews Hill, any planning application or development will not be supported until a masterplan for those areas has been prepared and agreed by the Council, in the case of Crews Hill, through preparation of a Supplementary Planning Document or similar statutory subsequent planning mechanism, such as an Area Action Plan. This is to ensure a comprehensive and coordinated approach to development, and to ensure that development is supported by the necessary new supporting infrastructure.</i></p> <p>Similar amendments should be made to paragraph 2.27 reflecting the above.</p>	<p>LBE values TfL's input and remains committed to ensuring that development in these areas is comprehensive, sustainable, and aligned with the borough's overarching vision for growth.</p> <p><b>Development and Planning Mechanisms:</b> LBE acknowledges the importance of detailed masterplanning for placemaking areas PL10 and PL11. As stated in Policy SS1, development at Crews Hill will proceed through the preparation of a Supplementary Planning Document (SPD) or similar subsequent planning mechanism. LBE appreciate TfL's suggestion of clarifying language to ensure a comprehensive approach and confirm that our commitment remains to prepare SPDs, which will be subject to extensive consultation with all relevant stakeholders, including TfL. This ensures that key considerations such as transport provision, infrastructure, site layout, densities, phasing, and delivery</p>	<p>While we appreciate Council's commitment to master planned approach for Green Belt sites and working with TfL, however, without adequate safeguards in the Local Plan policies for these placemaking areas of Crews Hill and Chase Park, there is a risk of low density car dependent development as currently proposed within the spatial frameworks. This does not align with Good Growth objectives of the London Plan and sustainable locations policies within the NPPF proposals.</p> <p>At a minimum, we would request following policy hooks to be incorporated in the policies for the Chase Park and Crews Hill Placemaking areas. These have been articulated throughout in our response in column 4 of this appendix:</p> <ul style="list-style-type: none"> <li>- represent the areas as single site allocations to affirm the coordinated approach and discourage piecemeal developments.</li> <li>- optimal densities across the areas</li> </ul>	<p><b>Commitment to Strategic Planning Mechanisms</b></p> <p>LBE reaffirms its commitment to preparing a Supplementary Planning Document (SPD) for Crews Hill, which will serve as a structured framework to ensure that development within the area is sustainable, coordinated, and aligned with the Council's strategic objectives. The SPD will provide the necessary policy mechanisms to address:</p> <ol style="list-style-type: none"> <li>1) A coordinated approach across fragmented land ownership.</li> <li>2) Optimal densities for development.</li> <li>3) Minimum building heights.</li> <li>4) Maximum parking standards.</li> </ol> <p>This SPD will be the primary planning tool to prevent piecemeal development and ensure that Crews Hill achieves its full potential as a strategically planned area. LBE will continue to engage actively with TfL and other stakeholders</p>

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					<p>Since there is a lack of detail in individual site allocations in the green belt place making areas, it is advisable to represent the two placemaking areas, especially Crews Hill that has very fragmented land ownership, as a single site allocation to enable sites to be developed comprehensively as part of a coordinated, masterplanned approach. This will help avoid parts of the site coming forward in a piecemeal way with low density, car-dependent development without essential public transport infrastructure and services to support a sustainable development.</p> <p>For example, the Anglo Aquarium site at 30-32 Strayfield Road, which is within the Crews Hill Placemaking area, proposes a gross density of 22 dwelling units per hectare (58 affordable dwelling units) and more than 1 car parking space per home. This site is on a narrow road that only has hail and ride bus service every half hour and very limited local amenities. This kind of unsustainable, piecemeal development should be discouraged.</p> <p>To make best use of land that can support investment in adequate public transport investment, the Council may wish to consider the formation of a Development Corporation that could help deliver the vision of the local plan.</p>	<p>are comprehensively addressed.</p> <p><b>Amendment Proposal for PL10:</b> While LBE note the request to amend the text of Policy SS1 and paragraph 2.27 to reflect potential use of an Area Action Plan (AAP) for Chase Park, our current approach focuses on a masterplan is prepared and agreed by the Council to retain flexibility while ensuring detailed planning and coordination. The Council believes that SPDs and masterplans, supported by ongoing stakeholder engagement, are well-suited to address the complexities of development in these areas. That said, LBE remain open to further dialogue with TfL and other stakeholders to refine the scope and content of these documents, ensuring that all relevant considerations are effectively incorporated.</p> <p><b>Coordination of Land Ownership and Comprehensive Masterplanning:</b> LBE recognise the concerns about fragmented land ownership, particularly in the Crews Hill area. LBE is committed to taking a coordinated, masterplanned approach to development to avoid piecemeal, low-density, and car-dependent outcomes. This will be achieved through the SPD process, which will provide a strategic framework and detailed guidelines for development, ensuring alignment with infrastructure requirements and sustainability goals.</p> <p><b>Discouraging Unsustainable Piecemeal Development:</b> LBE shares TfL's view on the need</p>	<ul style="list-style-type: none"> <li>- minimum building heights</li> <li>- maximum parking standards</li> </ul> <p><b>Consideration of a Development Corporation:</b> Noted</p> <p>Refer to responses in the previous row that illustrate our position regarding collaboration, funding, sustainable development.</p>	<p>to refine this framework through the SPD preparation process and the Local Plan examination.</p> <p><b>Chase Park: Differentiated Approach</b></p> <p>LBE recognises the distinct characteristics of Chase Park compared to Crews Hill. While both areas require a coordinated approach, the consolidated land ownership and unique development context of Chase Park favour a Council-led masterplan rather than an SPD as the most appropriate planning mechanism. A masterplan offers the flexibility needed to address site-specific challenges while ensuring:</p> <ol style="list-style-type: none"> <li>1) Strategic and sustainable growth.</li> <li>2) Stakeholder engagement and collaboration.</li> <li>3) Alignment with overarching planning principles.</li> </ol> <p>However, LBE remains open to incorporating a commitment to an SPD for Chase Park should the Inspector determine this is necessary during the Local Plan examination.</p> <p><b>Policy Hooks for Coordinated Development</b></p> <p>LBE acknowledges TfL's request for policy hooks to discourage piecemeal development and guide future planning. While the SPD for Crews Hill and the masterplan for Chase Park will address these issues comprehensively, the Council has embedded related principles in other policies across the Local Plan to ensure a consistent approach to development, including:</p>

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						<p>to prevent unsustainable development patterns. The SPD for Crews Hill will set out clear guidelines to ensure that developments, such as the example provided for the Anglo Aquarium site, meet density, transport, and sustainability criteria. This will help ensure that all new developments are adequately supported by essential infrastructure and contribute positively to the borough's vision for growth.</p> <p><b>Public Transport and Infrastructure Investment:</b> LBE remains committed to working with TfL to identify and deliver the necessary public transport infrastructure to support development in Chase Park and Crews Hill. This includes further detailed assessments and planning for bus routes, walking and cycling connections, and other sustainable transport initiatives. The updated Infrastructure Development Plan (IDP) will continue to evolve through collaboration with TfL to reflect these priorities and ensure that infrastructure delivery aligns with development needs.</p> <p><b>Consideration of a Development Corporation:</b> While LBE appreciates the suggestion of exploring a Development Corporation as a potential mechanism for delivery, we believe that the SPD approach, combined with strong partnerships and robust governance frameworks, offers an effective means to achieve the Council's vision. LBE remain open to discussing innovative solutions for delivery and coordination, but our current strategy focuses on leveraging existing planning and stakeholder engagement</p>		<ul style="list-style-type: none"> <li>• <b>Policy SP DE1:</b> Promotes high-quality design that reflects optimal densities and considers minimum building heights to ensure efficient use of land.</li> <li>• <b>Policy SP T2:</b> Sets out maximum parking standards to align with sustainable transport and environmental objectives, prioritizing active and public transport over car dependency.</li> <li>• <b>Policy SP SS1:</b> Requires a coordinated approach to development across fragmented land ownership, ensuring comprehensive planning for placemaking areas.</li> <li>• <b>Policy SP PL9:</b> Establishes principles for sustainable development within areas of strategic importance, ensuring coherence across large-scale developments.</li> </ul> <p>These cross-referenced policies reinforce the Local Plan's overarching commitment to sustainable and coordinated development, ensuring that Crews Hill and Chase Park are developed in alignment with borough-wide planning objectives.</p> <p><b>Stakeholder Engagement and Collaboration</b></p> <p>LBE remains committed to working collaboratively with TfL and other stakeholders throughout the planning process. Whether through the SPD for Crews Hill, the masterplan for Chase Park, or any other mechanism required, the Council will ensure that stakeholder input is incorporated effectively.</p>

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						<p>mechanisms to achieve exemplary outcomes.</p> <p>LBE remains committed to comprehensive, coordinated development in placemaking areas PL10 and PL11 through the preparation of SPDs and/or masterplans, ongoing collaboration with TfL, and a commitment to delivering sustainable, well-planned growth. LBE looks forward to continued engagement to ensure that these objectives are met.</p>		Should the Inspector determine that an SPD is also required for Chase Park, LBE will engage transparently and proactively with TfL to ensure the document's preparation aligns with the Council's planning objectives and supports the area's long-term growth.
4.	continued	continued	A strategic transport assessment (STA) show parts of the highway network are over capacity during the peaks, and the rail network is within capacity. However, rail capacity is constrained outside the borough boundary towards central London. The STA shows predicted bus demand will cause capacity problems on the bus network. Bus capacity is constrained by road capacity, particularly given the context of overall traffic growth.	The STA highway assessment is based on "worst case" scenario and does not account for mitigations or improvements delivered in support of the Local Plan or any not committed strategic transport schemes. The STA does not take into account any changes in travel behaviour that have occurred post-Covid. Opportunities to improve bus performance within Enfield will continue to be explored alongside TfL.	Noted.	<p>LBE acknowledges and understands the challenges highlighted regarding highway and bus network capacity, particularly during peak periods and in the context of traffic growth. LBE would like to emphasise that the STA represents a "worst-case" scenario and does not currently account for mitigations, enhancements, or strategic transport schemes that may be delivered as part of or alongside the Local Plan.</p> <p>Moreover, LBE recognise that travel behaviour patterns have evolved post-Covid, and we will continue to factor these changes into future planning and assessments.</p> <p>LBE remains committed to ongoing collaboration with TfL to identify and implement opportunities for improving bus performance and network resilience within the borough. Our partnership will focus on practical solutions, aligning with broader sustainability and capacity objectives to support future growth while maintaining a balanced and accessible transport network.</p> <p>LBE looks forward to continuing to work with TfL to</p>		

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						refine and address transport infrastructure needs in a manner that supports our shared goals of sustainable development and effective network management.		
5.	continued	continued	We accept that the highway impact is a 'worst case' scenario. However, there is a risk that high parking levels result in a relatively high mode share assumption for car use which could undermine public transport provision due to constrained road space, particularly for Crews Hill and Chase Park. Furthermore, an assumption of high car mode share along with public transport assumption as per the proposals could result in congestion and make public transport unreliable, less attractive and unviable. It is also worth noting that the highway modelling does not include reallocation of road space for buses, walking and cycling which will be required to enable active travel and provide attractive bus services- both key to delivering a genuine choice of mode as required by the NPPF paragraph 74 and 109.	The STA mode share has been generated by TfL's strategic model MoTioN. Within MoTioN Population and Employment growth assumptions are aligned to those in the London Plan. The transport policies, services and infrastructure that are represented in the model forecasts are those that are funded and committed. The Mayor's Transport Strategy contains policies, infrastructure and PT services that are not politically committed to and/or unfunded. This committed & funded vs aspirational policy point is the key difference between the STA mode share forecasts and the MTS / London Plan outcomes.	We welcome the use of MoTioN for the strategic transport assessment. While the modelling approach overall is sound, the model inevitably generates results based on the assumptions input in the model. To get a realistic scenario of the impact of the proposed development of the green belt sites, the proposed assumptions of densities, car parking ratios (trip rates), infrastructure improvements, bus proposals, etc need to be input appropriately.	LBE appreciates TfL's recognition of the modeling approach using MoTioN and acknowledge the importance of accurate and realistic assumptions for predicting transport outcomes. The STA reflects a comprehensive assessment based on committed and funded infrastructure and policies as currently recognised within the London Plan and the Mayor's Transport Strategy (MTS). While this distinction between committed versus aspirational infrastructure can lead to differences in projected outcomes, LBE believes it remains a necessary approach for ensuring a robust, evidence-based plan.  LBE acknowledges TfL's concerns regarding the potential implications of high parking levels and associated car mode share assumptions, particularly for areas such as Crews Hill and Chase Park. While LBE remain committed to a balanced approach that encourages sustainable travel behaviours and prioritises measures to enhance public transport provision and reallocate road space for buses, walking, and cycling, consistent with NPPF guidelines (paragraphs 74 and 109) and local ambitions for sustainable development, LBE also recognise the need to approach this realistically. The viability and deliverability of these sites must be considered	<b>STA &amp; Modelling:</b> While TfL was made aware of the model input assumptions on housing quantum and car parking provision as provided by the Council's consultants, TfL Strategic Modelling colleagues did not provide an opinion on soundness of the policy options or the input assumptions and whether these align with the Local Plan Spatial Strategy vision and objectives.  Irrespective of what has gone into the modelling and that it represents a worst case scenario, our fundamental concerns are related to the principle of development in remote and arguably unsustainable locations and the policies that enable low-density and car-oriented development on Green Belt sites. These concerns have not been addressed and cannot be resolved by updated modelling. For example, the cumulative impact of relatively low volumes of car-dependent development in outer London will inevitably result in an overall reduced capacity for housing in London and modelling of individual sites cannot adequately reflect this. This is why the Good Growth approach is fundamental to meeting housing need and ensuring a good quality of life for Londoners now and in the future. Frequent car use and land-hungry car parking at these sites will undermine the ability to densify the rest of the borough and make	We acknowledge TfL's concerns regarding the principle of development in Green Belt locations and their alignment with sustainable growth. However, the modelling provided reflects a worst-case scenario and was based on housing quantum and parking assumptions agreed with the Council's consultants on behalf of the LPA and shared with TfL.  The Council remains confident that the proposed Green Belt sites align with the Local Plan Spatial Strategy vision and objectives, which seek to balance housing delivery, sustainable travel options, and practical realities of outer London development. The development of Crews Hill and Chase Park includes key safeguards to support sustainable travel, while recognising the specific challenges of these locations.  While we acknowledge TfL's position, it is important to note that updated modelling cannot resolve fundamental disagreements on the principle of development. Instead, we believe the Local Plan appropriately balances sustainable growth, Good Growth principles, and the distinct characteristics of Enfield as an outer London borough.  LBE is committed to engaging with TfL to refine the Infrastructure Delivery Plan



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						<p>carefully with a reasonable provision for parking being a critical factor in marketability and practicality.</p> <p>Our approach aligns with the evidence outlined in our Viability Assessment [VIA1] which supports policies that are realistic and deliverable while considering market conditions and infrastructure needs.</p> <p>Regarding the input assumptions for densities, car parking ratios, infrastructure improvements, and bus proposals, These were agreed with TfL Strategic Modelling colleagues at the times the runs were undertaken. However, LBE remains open to further collaboration with TfL to refine and validate these parameters. Our aim is to ensure that all transport modeling inputs reflect realistic development scenarios and accurately support our shared goals of reducing car dependency and promoting active and sustainable travel options.</p>	<p>best use of limited land available for development.</p> <p><b>IDP and VIA1:</b> We welcome Council's commitment to engage with TfL and develop further updates to the IDP in a transparent manner. The IDP does not correctly reflect the outcomes of discussions with TfL. See Appendix C for specific issues with the emerging IDP published on 30 September 2024.</p> <p>Since there are no indicative cost considerations in the emerging IDP, it is not clear if the substantial transport infrastructure costs needed have been factored in the Viability Assessment [VIA1].</p> <p><b>Balanced approach to parking and holistic London Plan policies:</b> As indicated previously, 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 the making the best use of land, does not set exemplary standards of appropriate development that necessitates Green Belt release and does not align with the Council's ambition of achieving 75 per cent mode share. It is also using a London Plan parking standard in a way that was unintended by the spirit of the policy which states the car free or car lite development should be the starting point for proposals. The higher standard at PTAL 0-1 is necessary for London-wide standards that must recognise and respond to the relatively limited circumstances in which development of modest scales takes place in less well connected locations, but it is not intended to suggest that larger scale, strategic development sites without adequate public</p>	<p>(IDP) further, and we value the feedback provided. However, we believe the current IDP reflects the discussions held to date, and it is a live document that will continue to evolve as the Local Plan progresses.</p> <p>Regarding viability, the Council recognises the importance of indicative costings for transport infrastructure. This will be addressed in future updates to the IDP, ensuring a transparent and comprehensive approach that accounts for both infrastructure needs and the outcomes of the Viability Assessment.</p> <p>LBE's position is that Green Belt release must strike a realistic balance between promoting sustainable travel and recognising the practical needs of an outer London borough.</p> <p>The Council's use of the London Plan maximum parking standards (1.5 spaces per dwelling in PTAL 0-1 areas) is appropriate for strategic development in less connected areas. While TfL advocates for car-free or car-lite development as the starting point, this approach is not always feasible in Enfield. Instead, our policies aim to restrain car use while still accommodating practical requirements, supporting a gradual shift toward sustainable travel options over time.</p> <p>We disagree with the assertion that these parking standards undermine the principles of Good Growth. Enfield's approach reflects a nuanced application of London Plan policies that considers local context, ensuring that development is viable,</p>
6.	continued	continued	<p>The STA does not support a mode share target of 75 per cent as identified in the local plan. As per the LTDS 2022/23, the sustainable mode share for the entire borough is about 49 per cent. Some urban placemaking areas in the borough are assumed to have lower car parking ratios but this is likely to obscure the impact of Crews Hill and Chase Park placemaking areas which will generate much greater levels of car use unless parking is constrained. The STA only assesses 2041 as a future year, so it does not provide sufficient detail of when and what transport investment is</p>	<p>As "worst case" the STA assumes Crews Hill and Chase Park will have levels of car use comparable to the existing levels in the surrounding areas. These levels are within the London Plan car parking policy, and no further mitigation was applied as part of the "worst case" STA testing.</p> <p>Following further consultation with TfL colleagues WSP/LBE will provide an updated modelling test in line with TfL Reference Case car mode share assumptions for the Local Plan for review and inclusion in the evidence base. This modelling scenario will be representative of the London</p>	<p>Assuming current levels of car use in the area for the green belt sites will not result in the sustainable development and sustainable mode share target that the Plan commits to. London Plan policies should be considered as a whole to provide Good Growth and not just the maximum car parking standards in the London Plan for current PTAL of 0 – 1, which is 1.5 cars per dwelling unit. There is a risk if such levels of parking are provided with piecemeal development within the green belt sites. The effects of this cumulatively could be worse than the tested worst-case scenario.</p>	<p>LBE is committed to achieving sustainable growth and good placemaking outcomes.</p> <p><b>STA Assumptions and Mitigation:</b> As previously noted, the STA presents a "worst-case" scenario that assumes car use levels for Crews Hill and Chase Park comparable to those in surrounding areas, consistent with existing London Plan car parking policies. LBE recognise that these assumptions, as modeled, represent a conservative estimate and may not fully capture the potential impact of future mitigation measures or policy interventions designed to shift</p>	<p>needless to say, the Council's ambition of achieving 75 per cent mode share. It is also using a London Plan parking standard in a way that was unintended by the spirit of the policy which states the car free or car lite development should be the starting point for proposals. The higher standard at PTAL 0-1 is necessary for London-wide standards that must recognise and respond to the relatively limited circumstances in which development of modest scales takes place in less well connected locations, but it is not intended to suggest that larger scale, strategic development sites without adequate public</p>	<p>The Council's use of the London Plan maximum parking standards (1.5 spaces per dwelling in PTAL 0-1 areas) is appropriate for strategic development in less connected areas. While TfL advocates for car-free or car-lite development as the starting point, this approach is not always feasible in Enfield. Instead, our policies aim to restrain car use while still accommodating practical requirements, supporting a gradual shift toward sustainable travel options over time.</p> <p>We disagree with the assertion that these parking standards undermine the principles of Good Growth. Enfield's approach reflects a nuanced application of London Plan policies that considers local context, ensuring that development is viable,</p>

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			needed, particularly for Crews Hill and Chase Park. Further work should be carried out which is focused on the impact of these two placemaking areas as part of the Local Plan evidence base and its outputs should be addressed through Infrastructure Delivery Plans.	<p>Plan aspirations for mode share and will provide a range of forecast for highway related impacts that will need to be further explored on a site by site basis when proposals are brought forward.</p> <p>Further work can be done at the appropriate time alongside TfL and to inform the Supplementary Planning Document (SPD) work for Crews Hill and Chase Park.</p>		<p>travel behaviors towards more sustainable modes.</p> <p><b>Updated Modelling and Further Collaboration:</b> In recognition of TfL's concerns, LBE, alongside WSP (on behalf of the LPA) and TfL colleagues, is committed to updating modeling tests that align with TfL Reference Case car mode share assumptions. This scenario will reflect the aspirations of the London Plan for mode share targets and provide a range of forecasts for highway and transport-related impacts. This work will inform further detailed assessments and serve as an evidence base for future site-specific proposals.</p> <p><b>Balanced Approach to Parking Standards:</b> While LBE understand the risk of high parking levels potentially undermining sustainable development, it is important to strike a balance that ensures development viability and marketability. Parking levels for Crews Hill and Chase Park will be carefully managed within the framework of the London Plan's maximum standards for areas with PTAL ratings of 0-1. However, LBE remains committed to exploring strategies to reduce car dependency, including infrastructure investment in public transport, walking, and cycling, which will be addressed in subsequent SPDs and planning processes. Our goal is to mitigate the risk of piecemeal development and ensure cohesive, sustainable growth across these sites.</p> <p><b>Holistic Consideration of London Plan Policies:</b> LBE agrees that London Plan policies should be considered</p>	<p>transport and active travel connectivity should be developed in London with significant levels of car parking.</p> <p>We welcome the Council's commitment to work with TfL to support sustainable development and Good Growth.</p>	<p>deliverable, and supports long-term sustainability goals.</p> <p>The Council remains committed to supporting sustainable development and working with TfL to deliver Good Growth. We value TfL's contributions and will continue to engage constructively on outstanding matters, particularly through updates to the IDP and ongoing policy discussions.</p> <p>While LBE acknowledge TfL's concerns, we believe the Local Plan strikes the necessary balance between delivering housing, supporting sustainable travel, and recognising the unique challenges of developing in an outer London context.</p> <p>We look forward to continuing this dialogue and addressing any further points raised as part of the examination process.</p>

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						<p>holistically to support Good Growth. LBE is committed to working with TfL to ensure that planned developments in Crews Hill and Chase Park contribute to a sustainable mode share target through integrated infrastructure planning, effective public transport solutions, and active travel initiatives. This will involve addressing cumulative impacts, enhancing connectivity, and prioritising measures that support a genuine mode shift.</p> <p><b>Infrastructure Delivery Plans (IDP) and Future Work:</b> LBE recognise the importance of detailed planning to support transport investments and address potential cumulative impacts. The updated Infrastructure Delivery Plan (IDP) will continue to be refined through collaboration with TfL and other stakeholders, ensuring that transport and infrastructure needs are appropriately identified, phased, and delivered to support the borough's growth aspirations in a sustainable manner.</p> <p>LBE is committed to a balanced, realistic approach that aligns with both the London Plan's sustainability goals and the viability of developments within the borough. LBE welcome further collaborative work with TfL to refine and enhance transport and infrastructure strategies to meet our shared objectives.</p>		

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7.	continued	continued	Part 16 of the policy deals with infrastructure delivery; the requirements associated with the individual placemaking areas and site allocations should be agreed with all the infrastructure providers to guarantee that the infrastructure necessary to support the Local Plan as a whole and the individual Placemaking Areas of Crews Hill and Chase Park in particular, can be delivered.	Network Rail, National Highways and TfL have been consulted on transport matters. We have identified strategic infrastructure needs within the IDP. The IDP is a living document which will evolve through and beyond the examination process. Strategic infrastructure is a key issue that will be scoped and resolve through forthcoming spatial development planning documents.	<p>In relation to TfL, while a few discussions have happened on transport matters, <u>no approach has been agreed</u>. We remain concerned about the feasibility and viability of infrastructure provision.</p> <p>While we note the updated IDP published on Enfield's website on 30 September 2024, TfL <u>was not</u> consulted prior to its publication.</p> <p>To ensure that the Plan is sound and can be delivered, the IDP should include indicative costs and timescales for the proposed public transport services and infrastructure that need to be agreed with TfL (and other stakeholders, where appropriate) and ensure that these can be met through section 106 and CIL as indicated in the IDP.</p> <p>Public transport service provision and active travel infrastructure for the two placemaking areas of Chase Park and Crews Hill including new bus stops, new bus facilities, new bus route pump priming, new walking and cycling routes within the development, upgraded walking and cycling routes beyond the development and new footbridges and cycle links must be categorised as essential infrastructure rather than important or desirable.</p> <p>Development of the placemaking areas without sufficient public transport, a restrained approach to car parking, and optimised densities, would fail to both deliver Good Growth or make the best use of land as required by the London Plan.</p>	<p>LBE appreciates TfL's emphasis on ensuring that all infrastructure necessary to support the Local Plan and individual placemaking areas is both feasible and deliverable. LBE would like to offer the following clarifications and commitments in response:</p> <p><b>Consultation and Coordination with Infrastructure Providers:</b> LBE has actively engaged with Network Rail, National Highways, and TfL on transport and infrastructure matters since April 2021, demonstrating our proactive commitment to collaborative planning and delivery. While LBE acknowledges that these discussions have not yet yielded a finalised, agreed approach, we remain committed to deepening this engagement to reach mutually acceptable solutions. LBE will continue to facilitate and prioritise collaboration with all relevant infrastructure providers, including Hertfordshire and Essex County Councils, to comprehensively scope, refine, and deliver necessary infrastructure to facilitate Good Growth in the borough.</p> <p><b>Evolving Nature of the Infrastructure Delivery Plan (IDP):</b> As noted, the IDP is a living document that reflects the current understanding of strategic infrastructure needs and will continue to be refined throughout the Local Plan examination process and beyond. LBE acknowledge TfL's feedback regarding the need for further consultation on updates to the IDP. Moving forward, LBE will prioritise engagement with TfL and other</p>	Noted. As previously stated, these commitments need further time and work to get the results that the Council is seeking and the collaboration and agreement that would satisfy TfL.	<p>Enfield Council (LBE) appreciates TfL's continued engagement and constructive feedback regarding the Local Plan and its supporting infrastructure requirements. The Council acknowledges the time and effort required to align on outstanding matters and remains committed to collaboration with TfL to achieve mutually agreeable solutions.</p> <p>To this end, the following commitments are proposed for inclusion in the SoCG:</p> <p><b>Consultation and Coordination with Infrastructure Providers</b> LBE will continue proactive and regular engagement with TfL and other key infrastructure providers to refine and finalise infrastructure requirements. Specific efforts will include targeted discussions on unresolved matters identified in TfL's response to the Regulation 19 Local Plan and ongoing scoping sessions to align priorities and delivery mechanisms.</p> <p><b>Further Refinement of the Infrastructure Delivery Plan (IDP)</b> The Council recognises the evolving nature of the IDP and commits to further refining its content through collaboration with TfL and other stakeholders. This includes addressing key concerns such as:</p> <ol style="list-style-type: none"> <li>1) Incorporating indicative costs and timescales for transport and active travel infrastructure.</li> <li>2) Ensuring alignment with funding sources, including CIL and Section 106 contributions.</li> </ol>

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					<p>Further coordination and agreements are needed across different infrastructure providers (including Network Rail, National Highways, Hertfordshire Council) to determine what infrastructure is needed, what is deliverable, what funding is needed and available and the delivery timescales.</p>	<p>stakeholders to ensure that future iterations of the IDP are developed collaboratively and transparently.</p> <p><b>Inclusion of Indicative Costs and Timescales:</b> LBE recognises the importance of providing indicative costs and delivery timescales for proposed public transport services and infrastructure within the IDP. LBE will continue to work with TfL and other partners to ensure that these details are appropriately captured, with a view to aligning funding sources, including Section 106 and CIL contributions to meet the identified needs.</p> <p><b>Essential Infrastructure Designation:</b> LBE understands the critical role that public transport service provision and active travel infrastructure will play in supporting sustainable development at Crews Hill and Chase Park. LBE remains open to categorising these elements as essential infrastructure within the IDP, subject to ongoing discussions and viability considerations. This categorisation will be carefully balanced with ensuring deliverability and optimising land use, as outlined in the London Plan.</p> <p><b>Holistic and Collaborative Planning Approach:</b> The Council is committed to developing a comprehensive and coordinated approach to infrastructure planning and delivery, aligned with the objectives of Good Growth and sustainable development. This includes engaging in further coordination with infrastructure providers to identify realistic infrastructure requirements, funding opportunities, and</p>		<p>3) Designating public transport and active travel infrastructure as essential infrastructure, <del>subject to viability assessments.</del></p> <p><b>Alignment with Good Growth Principles</b> LBE remains committed to ensuring the proposed developments at Crews Hill and Chase Park align with Good Growth principles. To achieve this:</p> <ol style="list-style-type: none"> <li>1) Further detailed discussions with TfL will be prioritised to address concerns around sustainable development, mode share targets, and minimising car dependency.</li> <li>2) The Council will work with TfL to explore opportunities for enhanced public transport and active travel provision that support the strategic vision for these areas.</li> </ol> <p><b>Collaborative and Transparent Approach</b> Enfield Council acknowledges TfL's emphasis on the need for further collaboration to resolve outstanding matters. LBE proposes a structured approach to future engagement, including regular progress meetings and targeted workshops to address specific issues such as:</p> <ol style="list-style-type: none"> <li>1) Infrastructure delivery phasing.</li> <li>2) Funding strategies and responsibilities.</li> <li>3) Ensuring alignment between Local Plan policies and TfL's expectations for transport infrastructure.</li> </ol> <p><b>Commitment to Deliverability and Soundness</b> LBE will ensure that all future</p>

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						<p>delivery timelines. Our focus remains on facilitating growth in a manner that balances ambition with practicality, ensuring that Crews Hill and Chase Park achieve exemplary development outcomes.</p> <p>LBE values the ongoing dialogue with TfL and other stakeholders and are committed to working together to resolve outstanding infrastructure concerns, ensuring that our Local Plan is both sound and deliverable.</p>		<p>iterations of the Local Plan and supporting documents, including the IDP, are deliverable, transparent, and reflective of ongoing discussions with TfL. The Council remains focused on facilitating growth in a manner that balances ambition, practicality, and Good Growth principles.</p> <p>Enfield Council values the ongoing collaboration with TfL and reiterates its commitment to addressing outstanding concerns in a transparent and timely manner. We look forward to continuing our work together to achieve a Local Plan that is sound, deliverable, and aligned with shared strategic objectives.</p>

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8.	SS2- Making good places	N/A	We welcome the added references in Part I to promotion of active travel and creating places where active travel predominates with a particular focus on placemaking areas. The potential for active travel is much greater at Meridian Water and Southbury. The locations of Crews Hill and Chase Park are remote from essential services and town centre facilities and combined with the challenges posed by their topography, potential for integrating active travel will be much more difficult.	Noted	For the soundness of the Plan and its deliverability, specifically related to Crews Hill and Chase Park, much further work is needed to ensure that these areas can be served with public transport and active travel and rather than become car dependent areas.	<p>LBE appreciates TfL's observations regarding the different potential for active travel integration across the borough's placemaking areas, including Meridian Water, Southbury, Crews Hill, and Chase Park.</p> <p><b>Active Travel Integration Challenges:</b> LBE acknowledges the specific challenges related to the integration of active travel at Crews Hill and Chase Park, including their relative remoteness from essential services and town centres, as well as the topographical considerations. While these factors present challenges, they also highlight the importance of innovative, tailored strategies to promote active travel and sustainable transport solutions within these areas.</p> <p><b>Commitment to Comprehensive Solutions:</b> LBE remains committed to exploring a range of strategies and interventions to improve public transport provision and active travel connectivity for Crews Hill and Chase Park. This includes working closely with TfL and other stakeholders to develop infrastructure and service improvements that enhance connectivity and reduce car dependency over time. Such measures may include new and improved walking and cycling routes, expanded bus services, and targeted infrastructure investments that support sustainable travel behaviour.</p> <p><b>Balanced and Phased Approach:</b> While LBE recognise that achieving a fully integrated active travel and public transport network may</p>		

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						<p>require a phased approach, Enfield's Local Plan aims to establish a framework that promotes long-term, sustainable development in line with London Plan objectives. Through Supplementary Planning Documents (SPDs) and ongoing collaboration, LBE will ensure that infrastructure plans evolve to meet the needs of these areas as development progresses.</p> <p><b>Innovation and Collaboration:</b> LBE is committed to working with TfL to identify and implement innovative solutions that respond to the unique needs of Crews Hill and Chase Park. This may include reimagining active travel routes, enhancing connections to nearby transport nodes, and creating new facilities to support sustainable modes of travel. Our aim is to ensure that development in these areas aligns with broader objectives for sustainable growth while recognising site-specific challenges.</p>		
9.	continued	continued	In Parts 2 and 3 we reiterate comments under SSI above that it will be essential that a Supplementary Planning Document which is subject to consultation with stakeholders is prepared for both PLIO and PLII that sets out specific infrastructure requirements, transport provision, site layout, densities, phasing, delivery and mitigation in policies PLIO and PLII and the individual site allocations.	Noted and agreed	PL10 will need to be amended to state that an SPD will be developed for Chase Park.	<p><b>Commitment to an SPD for Crews Hill:</b> LBE remains committed to preparing a Supplementary Planning Document (SPD) for Crews Hill. Given the complexity and fragmented land ownership within this placemaking area, an SPD provides the most appropriate framework to ensure comprehensive coordination, detailed infrastructure planning, and extensive stakeholder consultation. This will support the delivery of sustainable, well-integrated development in alignment with London Plan objectives.</p>	<p>Noted, although we disagree.</p> <p>While we recognise the contextual difference between the two placemaking areas, both Chase Park and Crews Hill require further work and input from stakeholders and a statutory consultation provides a framework and opportunity for adequate input.</p> <p>Furthermore, a commitment to an SPD for both areas is reflected within the transport topic paper [E3.5], specifically Table 5-2 – TfL Outstanding and Ongoing Matters.</p>	<p><b>SPDs vs. AAPs:</b> LBE acknowledges TfL's feedback and remains committed to ensuring comprehensive planning and stakeholder engagement for both Crews Hill and Chase Park.</p> <p><b>Commitment to SPDs</b> LBE agrees in principle to the preparation of a Supplementary Planning Document (SPD) for Chase Park, recognising the framework that a statutory SPD provides for coordinated planning and public consultation. This aligns with the Council's commitment to robust and transparent stakeholder engagement.</p>



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						<p><b>Masterplan for Chase Park:</b> For Chase Park, LBE intends to prepare a masterplan that will be agreed by the Council. This approach reflects the distinct characteristics of Chase Park, including its comparatively more consolidated land ownership and different development context. A Council-led and agreed masterplan offers the flexibility needed to respond dynamically to site-specific conditions while still providing a coordinated and robust planning framework. The masterplan will outline key elements such as infrastructure requirements, site layout, transport provision, densities, and phasing, ensuring that development aligns with strategic goals and supports sustainable growth.</p> <p><b>Stakeholder Engagement and Coordination:</b> LBE recognises the importance of engaging stakeholders, including TfL, throughout the planning process for both Crews Hill and Chase Park. The SPD for Crews Hill and the masterplan for Chase Park will both be subject to thorough consultation to ensure that transport and infrastructure needs are addressed comprehensively and collaboratively.</p> <p>This differentiated approach allows us to tailor planning mechanisms to the unique characteristics of each placemaking area, ensuring effective and deliverable outcomes while meeting the borough's long-term growth aspirations.</p>		<p><b>Differentiated Approach</b> However, LBE reiterates that the distinct characteristics of Chase Park and Crews Hill justify a tailored approach. The consolidated land ownership and unique development context of Chase Park make a Council-led masterplan the preferred mechanism to deliver strategic and sustainable growth.</p> <p>We believe that a masterplan offers the flexibility required to address site-specific challenges while providing a coordinated and robust planning framework. Nevertheless, we are open to including a commitment to an SPD for Chase Park within the Inspector's consideration as part of the examination process. The Council also want to facilitate delivery as part of an overall housing trajectory, and we consider the approaches to be effective and efficient. To require an AAP would introduce extra time/delay to securing actual delivery.</p> <p><b>Stakeholder Engagement and Collaboration</b> LBE remains committed to engaging with stakeholders, including TfL, throughout the planning process for both Crews Hill and Chase Park. Should the Inspector determine that an SPD for Chase Park is required, the Council will work collaboratively to ensure its successful delivery.</p>

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10.	SP PL1 Enfield Town	N/A	We welcome the added reference in part 5 to major developments contributing towards cycling infrastructure through and around the placemaking area. It would be helpful to refer to contributions towards bus stops and crossings which could benefit from improvement. Although we welcome the added reference to car parking in part 9, we recommend that the wording should be amended to read: 'development should minimise the amount of car parking spaces as well as the negative impacts of car parking and servicing'.	LBE notes the proposed modifications. If they are further proposed by the Inspector, LBE would be supportive of these modifications being made.	Agreed.	<p><b>Contributions towards Bus Stops and Crossings:</b> LBE appreciate your recommendation to include references to contributions towards bus stops and crossings, alongside cycling infrastructure improvements. LBE recognises the importance of ensuring major developments contribute to a well-connected and accessible transport network within and around Enfield Town. The proposed modification will be set out in our response to PQ23 of the Inspector's initial letter reflecting LBE's commitment to enhancing connectivity and transport infrastructure extends across various placemaking areas, aligning with overarching goals for sustainable growth. LBE remain open to incorporating specific references to bus stop and crossing improvements if this is further proposed by the Inspector that would be necessary to make the Plan sound.</p> <p><b>Minimising Car Parking and Negative Impacts:</b> LBE acknowledges and supports TfL's suggested amendment to the wording in part 9 of Policy PL1, emphasising minimising car parking spaces and mitigating the negative impacts of car parking and servicing. The proposed modification will be set out in our response to PQ23 of the Inspector's initial letter reflecting our commitment on reducing car dependency and promoting sustainable transport options as it aligns with our broader strategic objectives for transport and public realm improvements.</p>	Noted	<p>Suggested Modifications to be proposed [E6] to PL1 Enfield Town</p> <p><b>Proposed wording:</b></p> <p><del>9. should minimise the negative impacts of car parking and servicing</del> <u>must contribute to transport infrastructure improvements, including enhanced bus stops, pedestrian crossings, and cycling networks. These measures will ensure a well-connected and accessible transport network, supporting Enfield Town's role as a sustainable and vibrant placemaking area. Car parking provision in Enfield Town will be minimised to reduce dependency on private vehicles and support sustainable transport objectives. The design and layout of developments will prioritise active travel and public transport accessibility, and all negative impacts of parking and servicing will be mitigated to enhance the public realm and environmental quality.</u></p>

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11.	SP PL2 Southbury	We welcome the requirement that development proposals will need to 'demonstrate how they will improve the pedestrian environment along the AIO through provision of a green buffer and facilitate delivery of a new cycle lane in both directions of the AIO Great Cambridge Road' (part 4) and that financial contributions will be sought to improve the public realm along Great Cambridge Road and Southbury Road including the areas in and around stations (part 6). However, part 6 should be explicit that contributions will also be sought to increase station capacity and to improve station access because there are concerns about the impact of proposed development on the gateline.	We welcome the addition of the statement: 'Contributions will also be sought to increase station capacity and to improve station access.' Gateline capacity could be increased within the existing station. However, step free access may need a wider reconfiguration of the station, and at least access to land adjacent to the station.	The STA assessment does not indicate a line capacity issue at this station and considering the frequency of services it is unlikely to pose a safety issue. WSP have undertaken ticket gateline calculations and this indicates that there is no additional ticket gateline requirement as result of the Local Plan. LBE will as part of the IDP and Transport Strategy work review in more detail Southbury station and capacity impacts and opportunities to deliver a step free access and improved gateline capacity will be discussed with TfL.	Agreed.			
12.	SP PL3 Edmont on Green	We welcome the requirement that 'Proposals will be expected to contribute to enhancing the public realm to make walking and	We welcome the changes made to this policy in response to TfL comments, including a reference to contributions towards public transport and positive support for car free developments in part 8. We strongly support the addition of	Noted				

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		cycling safer and more accessible and attractive' (part 9). Part 10 should make it clearer that potential improvements to Edmonton Green rail and bus stations and services would require funding to be secured through some form of ringfenced developer contributions. There should be explicit support for car free development and a requirement to substantially reduce existing car parking when sites are redeveloped. Development proposals and changes to traffic circulation must safeguard the continued operation of the bus station with no loss of efficiency or overall capacity in line with policy T3 of the London Plan and the emerging Transport Land LPG.	part 8d 'to retain a bus station with improved pedestrian linkage between it, the high street and the station' and part 9 'must encourage a modal shift in the area through reduction of car parking and improvements to walking, cycling and public transport infrastructure' and the statement in part IOc that 'Any changes to traffic circulation must safeguard the continued operation of the bus station with no loss of efficiency or overall capacity.' We have provided detailed requirements for the bus station and we have agreed changes to the town centre highway links to allow local re- routing of buses.					
13.	Angel Edmont on Placemaking Vision	Reference is made here to new rapid transport and green active travel corridors linking the new neighbourhood at Meridian Water to	We note and welcome changes to the placemaking vision that emphasise active travel corridors rather than new rapid transport which is unlikely to be viable within the current Local Plan timescales. Superloop route SLI provides some of	Noted			Noted	

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		<p>Edmonton Green and Angel Edmonton. TfL has previously commented on proposals for an East West Transit and stated that there is no current commitment or funding. Although this proposal has not been mentioned explicitly in the vision for Meridian Water or Edmonton Green or in any other strategic or transport policies, we would reiterate these points. We understand that feasibility work by Enfield on potential transit corridors is underway and urge the need for early engagement with TfL. It would be useful for any study or assessment work to investigate and the policy to promote lower cost interventions such as bus priority which could be linked to bus network improvements and are capable of being implemented within the Local Plan timescales. They could provide an incremental first step towards more ambitious long-term</p>	<p>these benefits but we also need complementary measures to support its introduction, such as bus priority and improved bus infrastructure.</p>					

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		aspirations and are more realistic within the Local Plan timescales.						
14.	SP PL4 Angel Edmonton	We welcome parts 7 - II of this policy which require contributions to improve the public realm, active travel and crossing facilities, as well as reducing the reliance on car parking and working towards car free developments. Any proposals affecting the North Circular Road including enhanced crossing facilities (part 9) and environmental improvements (part II) should be the subject of early discussion with TfL to establish feasibility and likely costs.	We welcome the addition of the statement in part 10 'Any proposals affecting the North Circular Road should be the subject of early discussion with TfL as highway authority to establish feasibility and likely costs.' This would also apply to the environmental improvements in part 12.	Noted	Part 12 will need to be amended to incorporate ' <b>in liaison with TfL</b> '.	LBE acknowledge TfL's request to amend part 12 to include the phrase "in liaison with TfL." LBE agrees that close collaboration with TfL, as the highway authority, is vital to ensure that all proposals affecting the North Circular Road, including environmental improvements, are developed effectively. In line with our response to PQ23 of the Inspector's initial letter, LBE can propose a modification to reflect this engagement, demonstrating our commitment to ensuring the Plan is sound and deliverable. LBE looks forward to continuing our productive partnership in delivering sustainable and well-connected development in Angel Edmonton.	Noted	<p><b>Suggested modification [E6] to PL4 Angel Edmonton</b></p> <p>12. must contribute to improvements to the environment along the North Circular Road through tree planting, wild meadows and other public realm works and appropriately scaled development that directly addresses the road, while protecting the health and wellbeing of intended occupants <u>in liaison with TfL, to ensure effective delivery and alignment with strategic transport objectives.</u></p> <p>A clarification could be added to reinforce the Council's commitment to collaborating with TfL.</p> <p><b>Proposed addition [E6] to supporting text:</b></p> <p><u>Enfield Council acknowledges the importance of collaborating with TfL, as the highway authority, to ensure that all proposals affecting the North Circular Road, including environmental improvements, are developed effectively. This partnership will help deliver sustainable and well-connected growth in Angel Edmonton, aligning with London Plan and Local Plan objectives.</u></p> <p>By incorporating the modification into Policy PL4, Part 12, and providing clarification in the supporting text, the Local Plan explicitly</p>

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								addresses TfL's request. This approach ensures alignment with TfL's expectations and demonstrates LBE's commitment to effective collaboration.
15.	SP PL5 Meridian Water	We welcome part 10 which requires contributions to improving and enhancing physical infrastructure, including improvements to rail and bus provision, active travel, new routes across the site to improve accessibility and connectivity.	N/A	None	None	None		
16.	SP PL6 Southgate	We welcome part 6 including the intention to create a more pedestrian friendly environment, the commitment to work with key stakeholders including TfL and the requirement for development to contribute towards enhancing the pedestrian environment and reduce reliance on surface car parks. Rather than just working towards car lite development we would like to see an ambition to create a largely car free development in recognition of the	We welcome the changes made in response to TfL's comments including the addition to part 7 of a reference to cycling infrastructure and the statement that 'Development proposals and changes to traffic circulation must safeguard the continued operation of the bus station with no loss of efficiency or overall capacity.' We also strongly welcome the amended statement in part 8 that development proposals 'must contribute towards enhancing the pedestrian environment and reduce the reliance on surface car parks, working towards car-free development.'	LBE notes the proposed modifications. If they are further proposed by the Inspector, LBE would be supportive of these modifications being made.	There are no proposed modifications required.	LBE appreciates TfL's recognition of the enhancements made in response to their comments, including the emphasis on improving cycling infrastructure, safeguarding the continued operation of the bus station, and supporting the transition towards car-free development to reflect Southgate's excellent transport connectivity.  LBE remains committed to fostering a pedestrian-friendly environment, enhancing active travel options, and reducing reliance on surface car parks as part of our vision for Southgate's sustainable growth. LBE is pleased that no further modifications are required at this time, and we value our collaborative work with TfL to ensure the successful implementation of this policy.	Noted.	

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		excellent transport connectivity. Mention could also be made of improvements to cycling infrastructure. Development proposals and changes to traffic circulation must safeguard the continued operation of the bus station with no loss of efficiency or overall capacity in line with policy T3 of the London Plan and the emerging Transport Land LPG.						
17.	SP PL7 New Southgate	We welcome parts 4 and 7 which require contributions towards improved active travel, links to stations and the public realm.	N/A	N/A				
18.	SP PL8 Palmers Green	N/A	We welcome part 7 which states that development proposals 'should contribute towards improving and enhancing cycling and pedestrian accessibility to support sustainable travel patterns'.	Noted				
19.	SP PL9/SP PLII	The proposed placemaking area immediately around Crews Hill station has a Public Transport Access Level ranging from only	TfL officers have been involved in initial discussions with Enfield Council officers and their consultants regarding sites at Crews Hill and Chase Park. In those discussions TfL has raised concerns with the Council about the lack of detail	The information supporting this placemaking area are appropriate to the nature of the policy and the lifespan of the site allocation.	Any development on Green Belt must be appropriate in terms of its location, density, and sustainability. Such development should be enabled through mechanisms to optimise densities that ensure the best use of land and	LBE welcomes the detailed feedback on Policy PL11 for Crews Hill and for TfL's continued engagement on this important placemaking area. LBE acknowledge TfL's observations and recommendations, and would	While we appreciate Council's commitment to a masterplanned approach to deliver sustainable development and working with TfL on various aspects as outlined in their response, however, without adequate safeguards in the Local Plan	LBE acknowledges TfL's request for additional safeguards within the Local Plan to ensure Crews Hill is delivered in line with Good Growth principles. The Council agrees with the importance of a coordinated and



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		<p>la to lb (on a scale of la - 6b, with 6b being the highest), with the wider area recording PTAL 0. Crews Hill station is currently served by Great Northern services between Hertford North and Moorgate. There are no bus services serving the area immediately around the station and the provision of new or diverted services is likely to be costly and inefficient compared to the costs of incremental improvements elsewhere.</p>	<p>on transport proposals, the need for car parking to be limited, and the costs and feasibility of providing the level of public transport provision in the proposed context (eg densities, parking, etc) which would be necessary to support Good Growth in line with the London Plan.</p>		<p>create liveable neighbourhoods with provision of active travel and public transport.</p> <p>Car-dependent and low density development does not represent Good Growth and 'wastes' land that is released. As per the Housing Topic paper, para 3.11, gross densities proposed across green belt sites are 50 dwelling units per hectare (du/ha) but based on our calculations the gross densities are in the range of 20-22 du/ha, considering that Crews Hill is set to 5583 homes on 286 hectares and Chase Park is set to deliver 3700 homes on 167 acres, including within and beyond the Plan period. Based on the site allocations as well in Appendix C of the Local Plan, the gross residential densities are lower than 50du/ha identified in the housing topic paper: Chase Park SA10.1 – 35 du/ha, SA10.2 – 18 du/ha, SA 10.3 – 18 du/ha, SA 10.4 – 13 du/ha; Crews Hill SA11.1 – 25 du/ha, SA11.2 – 2.6 du/ha, SA 11.3 – 19 du/ha; SA11.4 – 57 du/ha, SA11.5 – 13 du/ha, SA11.6 – 16 du/ha.</p> <p>The current policy should include some principles and key parameters in terms of optimal densities across the areas, maximum parking standards and building height ranges. The current policy should require a car parking strategy that requires parking restraint and use of car clubs to allow for mode choice as appropriate.</p> <p>We do not accept that car parking can be decided on a site by site basis. There needs to be a commitment in the placemaking policies in the Local Plan to car parking</p>	<p>like to provide the following responses:</p> <p><b>Public Transport Accessibility and Feasibility:</b> LBE recognises the challenges associated with the current Public Transport Accessibility Levels (PTAL) in Crews Hill. LBE appreciates the initial discussions held with TfL and agree that further work is required to develop sustainable transport solutions for the area. While LBE is aware that public transport provision may entail higher costs compared to incremental improvements elsewhere, LBE remain committed to exploring viable and innovative solutions to improve accessibility, reduce car dependency, and promote active travel.</p> <p><b>Density and Car Parking Standards:</b> LBE acknowledge TfL's concerns regarding densities and car parking standards for Crews Hill. As outlined in Enfield's Housing Topic Paper [TOP3], the proposed gross densities reflect a strategic approach that balances sustainable growth with market viability and the site-specific characteristics of Crews Hill. LBE is committed to optimising densities to ensure efficient land use while creating liveable, sustainable neighbourhoods. LBE will continue to work with TfL to refine our approach, including the development of a comprehensive car parking strategy. This strategy will consider parking restraint, promotion of car clubs, and alignment with mode share targets, with the aim of reducing reliance on private vehicles in line with London Plan objectives.</p>	<p>policies for the Chase Park and Crews Hill areas and/or another planning mechanism that provides an opportunity for a thorough review of the proposals, there is a risk of low density car-dependent development as proposed in the spatial frameworks. This does not align with Good Growth objectives of the London Plan and sustainable development policies in the NPPF.</p> <p>At a minimum, we would request following policy hooks to be incorporated in the Chase Park and Crews Hill Placemaking area policies in the Local Plan:</p> <ul style="list-style-type: none"> <li>represent the areas as single site allocations to affirm the coordinated approach and discourage piecemeal developments.</li> <li>optimal densities across the areas</li> <li>minimum building heights</li> <li>maximum parking standards</li> <li>commitment to SPDs or AAPs for both placemaking areas</li> </ul> <p><b>Parking, Marketability, and Viability:</b> We have not seen evidence to support such claims. On the contrary, some developers are recognising that they oversupply parking thinking there is demand which does not materialise so the evidence is mixed at best. Moreover, predict and provide approach for car parking is not policy compliant. The developments need to be designed for the travel behaviours we seek and mode shares required to deliver against multitude of objectives (environmental, social, health, climate change). With this approach we future proof London's ability to accommodate more growth.</p>	<p>masterplanned approach to discourage piecemeal development. To this end:</p> <p>LBE reaffirms its commitment to preparing a Supplementary Planning Document (SPD) for Crews Hill, which will provide a structured framework to ensure development is sustainable, coordinated, and aligned with strategic objectives.</p> <p>The SPD will serve as the key planning mechanism for ensuring a coordinated approach across the fragmented landownership at Crews Hill, incorporating specific policy hooks such as optimal densities, building heights, and parking standards.</p> <p>LBE will continue to engage with TfL and stakeholders to refine the policy framework through the SPD preparation process and the Local Plan examination.</p> <p><del>LBE recognises TfL's concerns regarding parking provision and its relationship to car dependency, viability, and sustainable transport objectives. However, Enfield's position reflects the unique challenges and context of an outer London borough, where car use cannot be entirely eliminated, particularly in locations like Crews Hill with limited existing public transport accessibility.</del></p> <p><b>Balanced Approach to Parking:</b> LBE's policies T1, T2 and T3 collectively address a balanced approach, while recognising that some provision is necessary to ensure market viability and the delivery of affordable family housing. This approach supports a gradual shift toward sustainable travel behaviours</p>

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					<p>restraint below London Plan maximum standards across the whole placemaking area to ensure that public transport provision is viable and that mode share targets can be met.</p> <p>Commitment to the 75 per cent mode share target for Crews Hill needs to be set out in an amendment to PL11 to match the commitment for Chase Park in PL10.</p> <p>While we note the updated IDP published on Enfield's website on 30 September 2024, TfL <u>was not</u> consulted prior to its publication as part of Duty to Cooperate discussions.</p> <p>To ensure that the Plan is sound and can be delivered, the IDP should include indicative costs and timescales for the proposed public transport services and infrastructure that need to be agreed with TfL (and other stakeholders, where appropriate) and ensure that they can be fully funded through S106 and CIL as proposed and delivered upfront to enable the development to be sustainable.</p>	<p><b>Commitment to Mode Share Targets:</b> LBE notes TfL's recommendation to include a commitment to the 75 per cent mode share target for Crews Hill, similar to the target for Chase Park. LBE is willing to explore setting appropriate mode share targets within the context of Policy PL11 and will engage further with TfL to ensure these targets are both ambitious and realistic, considering the unique characteristics of Crews Hill.</p> <p><b>Indicative Costs and Infrastructure Funding:</b> LBE acknowledges the importance of including indicative costs and delivery timescales for public transport services and infrastructure within the Infrastructure Delivery Plan (IDP). LBE recognise that successful delivery will depend on securing appropriate funding mechanisms, including Section 106 agreements and Community Infrastructure Levy (CIL) contributions. LBE is committed to ongoing collaboration with TfL and other stakeholders to ensure that infrastructure is planned and funded in a manner that supports sustainable development and aligns with duty to cooperate principles.</p> <p><b>Duty to Cooperate and Future Engagement:</b> LBE appreciates TfL's feedback regarding the publication of the updated IDP on 30 September 2024. While the IDP reflects current understandings and commitments, LBE remain open to further engagement with TfL as part of our duty to cooperate obligations. Our goal is to ensure that the IDP evolves to reflect mutually</p>	<p>Higher parking provision generally affects viability and could impact affordable housing provision due to the cost of providing car parking</p> <p>Parking availability is strongly correlated to car ownership and ownership is strongly correlated with car use. Car ownership is also strongly correlated to income levels. Lower parking availability results in lower car-ownership and people on lower incomes have lower car ownership. Currently per the Census 2021 34 per cent of Enfield households do not own cars. According to <a href="#">vehicle licensing stats</a> and <a href="#">Healthy Streets scorecard</a> both the rate of car ownership and absolute ownership has been declining in Enfield for the past five years.</p> <p>If the Council's vision is for providing family affordable housing in a sustainable development, then providing adequate sustainable transport infrastructure upfront is critical and should be the priority rather than baking in the need for owning cars which are expensive and lead to poorer health outcomes.</p>	<p>while addressing local market realities.</p> <p><b>Evidence and Collaboration:</b> LBE notes TfL's concerns regarding evidence on parking demand. The Council is committed to ongoing collaboration with TfL to refine its approach, including further exploring parking strategies such as car clubs, shared parking facilities, and innovative design solutions to reduce car dependency.</p> <p><b>Mode Share and Sustainable Transport:</b> LBE remains committed to aligning development proposals with sustainable travel behaviours and mode share targets. This includes prioritising investments in sustainable transport infrastructure to reduce reliance on private vehicles over time.</p> <p>LBE agrees that sustainable transport infrastructure is critical to achieving the Council's vision for Crews Hill as a sustainable development. To this end:</p> <p>The SPD will outline specific transport infrastructure requirements, including public transport accessibility, cycling routes, and pedestrian facilities, ensuring these elements are prioritised in development proposals.</p> <p>LBE will continue to engage with TfL to explore innovative and viable solutions for improving public transport accessibility in Crews Hill, acknowledging the higher costs associated with such interventions.</p> <p>Enfield Council appreciates TfL's emphasis on the need for adequate policy hooks and</p>

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						<p>agreed-upon transport and infrastructure priorities.</p> <p>LBE remains committed to delivering sustainable, well-integrated development at Crews Hill. We look forward to working closely with TfL and other partners to address outstanding concerns, refine policy details, and achieve a shared vision for high-quality placemaking that aligns with strategic and local objectives.</p>		<p>safeguards to future-proof Crews Hill and ensure alignment with Good Growth principles. The Council believes that the SPD framework, coupled with further collaboration with TfL during the examination and delivery phases, provides the appropriate mechanism for addressing these concerns.</p> <p><b>Commitments:</b></p> <p><b>SPDs:</b> The Council reaffirms its commitment to preparing an SPD for Crews Hill, which will detail infrastructure requirements, parking standards, densities, and other key elements. The SPD will ensure a coordinated approach to development despite the fragmented landownership within Crews Hill.</p> <p><b>Further Collaboration:</b> LBE will continue to engage with TfL to address outstanding concerns and refine the Local Plan policies and supporting documents.</p> <p>LBE remains committed to delivering a sustainable, well-connected, and vibrant development at Crews Hill, balancing strategic objectives with the practical realities of outer London development. The Council looks forward to working closely with TfL and other stakeholders to achieve this vision.</p>
20.	Crews Hill	There are no proposed transport projects to improve access or capacity either in this policy or in policy TI. With such a low level of public transport connectivity either	The lack of a costed and agreed Infrastructure Delivery Plan for the two sites is a particular concern. From documents seen to date, Enfield's consultants have substantially underestimated the costs of providing new bus services, indicating that the level of service suggested in	LBE acknowledges the poor level of bus coverage and services currently serving Crews Hill. LBE is keen to work with TfL to develop a phased approach to improving public transport services in this area, understanding the scale of the challenge and outcomes in terms of PTAL. LBE is keen to	While we note the updated IDP published on Enfield's website on 30 September 2024 TfL was <u>not</u> consulted prior to its publication as part of Duty to Cooperate discussions.	LBE appreciates the depth of TfL's observations and commitment to ensuring sustainable, integrated growth in this area.	Refer to TfL response in rows for SS1 Spatial Strategy and SP PL9/SP PLII	LBE's responses are set out as part of SS1 and PL11. LBE has nothing further to add.
					To ensure that the Plan is sound and can be delivered, the IDP should include	<b>Public Transport and Connectivity Challenges:</b> LBE acknowledges the current challenges in providing high-		

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		<p>current or planned, the development of this area would be likely to be car dependent.</p> <p>This would exacerbate problems of road network capacity noted in the policy. It is very unlikely that the design, form and layout of transport infrastructure could create a place where walking, cycling and use of public transport is the natural choice even if this were affordable.</p> <p>For London to grow sustainably an integrated approach to land use and transport would be necessary to achieve a 75 per cent outer London mode share for walking cycling and public transport (to achieve a city-wide target of 80 per cent). The focus for large scale mixed use development should be on growth corridors, town centres and Opportunity Areas, where there is more prospect of planned investment in the public transport</p>	<p>the placemaking strategies may not be deliverable. Further detail is needed to fully understand the nature of the developments, trip generation and mode share. For example, the provision of car parking will have considerable bearing on demand for buses and therefore materially impact the viability of any services provided. Other elements of any proposed development will impact how future residents choose to travel, including residential densities, the provision of local amenities and the design of the environment for walking and cycling.</p> <p>Even if the proposed options for bus services were deliverable, the PTAL would still only range from 1b to a maximum of 3 around Crews Hill station. By contrast, most of the urban placemaking areas in the borough comprise areas of PTAL 3 - 6, or there are existing commitments and funding to provide public transport improvements. Therefore, limited weight should be attached to part 18e of the policy which suggests that it will be possible to provide 'improvements to public transport accessibility through an expanded bus network through working with TfL to achieve their aim of all Londoners living within 400m of a bus stop.'</p> <p>TfL has concluded, based on the proposals seen to date that there is no clear way to ensure all housing and facilities in the development would be within 400 metres of the bus network and that many of the initial bus service suggestions made by Enfield's consultants would potentially not provide value for money because they would result in excess capacity on</p>	<p>ensure Crews Hill is better linked to local centers and services and to work with TfL and Developer partners to secure a sound plan and financial coverage. Further detail on the strategy to provide high frequency sustainable modes of transport to these areas have since been discussed between LBE and TfL bus colleagues. The updated Infrastructure Development Plan (IDP) published 30 September 2024 contains details of infrastructure requirements for both PLII and PLIO in line with latest discussions.</p> <p>Noted and agreed, LBE will work on further detailed work at supplementary policy document and planning application stages.</p> <p>It is currently assumed site allocation follows London Plan Policy T6 residential car parking and car ownership assumed in the STA is comparable to existing surrounding areas, this assumption has been agreed with the TfL strategic modelling team as a robust representation of the proposed development at the time the models were undertaken. As "worst case" the STA assumes Crews Hill and Chase Park will have levels of car use comparable to the existing levels in the surrounding areas. These levels are within the London Plan 2021 car parking policy T6 which allows up to 1.5 cars per dwelling.</p> <p>Following further consultation with TfL colleagues WSP/LBE will provide an updated modelling test in line with TfL Reference Case car mode share assumptions for the</p>	<p>indicative costs and timescales for the public transport service and infrastructure requirements that need to be agreed with TfL (and other stakeholders, where appropriate) and ensure that they can be fully funded through S106 and CIL as proposed and delivered upfront to enable the development to be sustainable.</p> <p>In addition, public transport and active travel infrastructure should be considered essential/critical to the delivery of the Plan.</p> <p>There is no mention in the IDP regarding implementation of car parking controls and car clubs to enable a sustainable mode share target.</p> <p>Further work on this should be part of the IDP and the master planning stage through an SPD or an Area Action Plan and should not be left for individual planning application stages. This work should ensure an area wide approach along transport corridors developing a coherent framework that considers the impacts of the development on the extended transport network and necessary mitigations and investments.</p> <p>There is a difference between assumptions for modelling purposes and the policy approach needed to deliver against the London Plan policy. Modelling can be used to identify what levers are needed to deliver different outcomes and thus inform the policy approach. We note the modelling assumptions are based on current trends and have been used to justify the policy approach, which is not appropriate. TfL is concerned about the premise of the</p>	<p>quality public transport services to Crews Hill due to its low Public Transport Accessibility Levels (PTAL) and the lack of existing services. LBE is committed to working closely with TfL and other stakeholders to explore and implement a phased approach to improving public transport services, including new and expanded bus networks. LBE understands that enhancing connectivity is essential for achieving a sustainable mode share and aligning with London Plan objectives. The updated Infrastructure Delivery Plan (IDP), published on 30 September 2024, outlines initial infrastructure requirements, and LBE remain open to further refinement through collaborative engagement with TfL.</p> <p><b>Indicative Costs, Timescales, and Funding Mechanisms:</b> LBE recognises TfL's concerns regarding the lack of costed and agreed transport infrastructure proposals. LBE is committed to incorporating indicative costs and delivery timescales for proposed public transport and active travel infrastructure within the IDP. This will be done in coordination with TfL to ensure realistic and achievable plans, supported through Section 106 agreements and Community Infrastructure Levy (CIL) contributions. LBE will continue to engage with TfL to ensure that the infrastructure required to support sustainable development at Crews Hill is fully funded and delivered in a timely manner.</p> <p><b>Density, Car Parking, and Mode Share Targets:</b> LBE appreciates the importance of achieving optimal densities and</p>		

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		<p>network. There is a real risk of creating an isolated development that does not function as an integral part of the existing built up area and is incompatible with the Mayor's transport objectives. Although we understand that further assessment work is underway to try to establish transport impacts and mitigation, we are not confident that the poor public transport connectivity and consequent reliance on car use could be overcome even with substantial investment. As it stands, TfL would be likely to raise strong objections to this policy on strategic transport grounds.</p>	<p>other parts of the route. Developer contributions are used to subsidise bus services for a time limited period, and it is essential that bus services meet key criteria and are viable in the long-term. Based on the location of Crews Hill and absence of existing bus services and local amenities it is unlikely that the level of bus service that could be provided to the area will be sufficiently attractive to provide a realistic travel option for the majority of residents. Moreover, the road width and capacity constrain the provision of bus capacity and two-way service.</p> <p>Although the policy recognises the importance of active travel, cycling and walking will not provide viable options unless all the active travel infrastructure providing links to local services and amenities are in place before the residential units are occupied.</p> <p>TfL further notes that, unlike the policy for Chase Park, there is no commitment to achieve the 75 per cent mode share target. No commitments are given on limiting car parking in contrast to most of the other placemaking areas and Enfield's transport modelling which has been shared with TfL has assumed car ownership of 1.15 cars per dwelling. This contrasts with other major development sites within urban areas where car ownership is assumed to be between 0 and 0.2 cars per dwelling.</p> <p>In terms of localised impacts, the transport modelling predicts an increase of up to 550 additional new vehicles in the morning peak on Cattlegate Road/Theobalds Road and 560</p>	<p>Local Plan for review and inclusion in the evidence base. This modelling scenario will be representative of the London Plan aspirations for mode share and will provide a range of forecast for highway related impacts that will need to be further explored on a site by site basis when proposals are brought forward. LBE deems current assumption in line with the London Plan policy appropriate, but will consider a phased, more controlled approach to car parking on a site by site basis as sustainable travel alternatives are improved.</p> <p>The IDP published 30 September 2014 includes a detailed list of highway network infrastructure requirements for Crew Hill and Chase Park. It is stated in the IDP that "Scope of upgrades to be determined following detailed modelling as part of future work." this is an "essential" priority that will be the responsibility of the Developer and Enfield Council.</p> <p>Enfield Council is committing to prepare Supplementary Planning Document (SPD) for these site allocation. The SPD will be produced by the Council in partnership with the developers, landowners, key stakeholders including TfL and in consultation with the local community. The SPD will help put in place appropriate and fair mechanisms to secure the delivery of infrastructure and give confidence to the market to bring forward development sites.</p>	<p>proposed development which currently risks being low density and car dependent. Current levels of car use in the area will not result in the sustainable development and sustainable mode share target that the Plan commits to. London Plan policies should be considered as a whole to provide Good Growth and not just the maximum car parking standards in the London Plan for current PTAL of 0-1 which is 1.5 cars per dwelling unit. There is a risk of such levels of parking provided with piecemeal development within the green belt sites. The effects of this cumulatively could be worse than the tested scenario.</p> <p>We do not accept that car parking can be decided on a site by site basis. There needs to be a commitment in the placemaking policies in the Local Plan to car parking restraint below London Plan maximum standards across the whole placemaking area to ensure that public transport provision is viable and that mode share targets can be met.</p> <p>The Council should ensure that any such work is done in coordination with TfL and any outcomes are agreed with TfL.</p> <p>While we acknowledge the commitment of preparing Supplementary Planning Documents for both Crews Hill and Chase Park, the Local Plan policy should include some principles and key parameters in terms of optimal densities across the areas, maximum car parking standards and building height ranges. The current policy should require a car parking strategy that requires parking</p>	<p>limiting car parking to support sustainable transport goals. While the Strategic Transport Assessment (STA) used existing trends and assumptions for modeling purposes, LBE is open to refining our approach to better align with London Plan aspirations. This includes exploring mechanisms to manage car parking more effectively across the entire placemaking area, including consideration of parking restraint measures, car clubs, and other strategies to promote mode choice and reduce car dependency.</p> <p>LBE remains committed to setting appropriate mode share targets and ensuring that policy parameters for densities, parking standards, and building heights reflect best practices for sustainable development. We recognise that achieving a 75 per cent sustainable mode share target will require coordinated efforts, detailed planning, and close collaboration with TfL and other partners.</p> <p><b>Masterplanning and Supplementary Planning Documents (SPDs):</b> LBE acknowledge TfL's view that piecemeal development could undermine the sustainability of Crews Hill. LBE is committed to preparing a Supplementary Planning Document (SPD) for Crews Hill to ensure a coordinated, comprehensive approach to development. While SPDs cannot create policy themselves, they will provide essential guidance for implementing policy objectives, including transport infrastructure and active travel improvements. LBE will ensure that the SPD process involves</p>		

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			<p>in the evening peak. The modelling work found that 'Delays at access points to the network are high for Crews Hill and Chase Park, more detailed work on how these trips access the highway network required'.</p> <p>Moreover, if the sites within PLI0 and PLII were to be delivered without a masterplanned approach considering densities, active travel and public transport infrastructure, and services, it could result in even higher parking levels (1.5 cars per dwelling unit) for these areas in PTAL 0, Ia, and Ib which will create worse impacts and an unsustainable development. Therefore, TfL is concerned that there is insufficient information on how development will be coordinated across the placemaking area and that identifying six separate site allocations does not provide confidence that a comprehensive and integrated development across the placemaking area can be achieved. The result of the proposed new settlement at Crews Hill is likely to be car dominated development from the outset which is contrary to the Good Growth objectives set out in the London Plan. The exceptional high costs of providing the necessary transport infrastructure and services to support such a new settlement as proposed and that is particularly isolated from existing centres/ services, could prejudice the ability to secure other London Plan and Local Plan priorities including affordable housing and social infrastructure</p>		<p>restraint and use of car clubs to allow for mode choice when needed.</p> <p>Supplementary Planning Documents can provide details on implementation of policy and do not create policy themselves, so it is critical for the Local Plan to address these concerns through modifications.</p>	<p>TfL and other key stakeholders to develop a coherent framework that addresses transport corridors, localised impacts, and necessary mitigations.</p> <p><b>Coordination and Duty to Cooperate:</b> LBE is committed to fulfilling its Duty to Cooperate obligations and maintaining transparent communication with TfL and other stakeholders. LBE acknowledges TfL's feedback regarding consultation on the IDP and will ensure that future updates are developed collaboratively, reflecting agreed-upon transport priorities and infrastructure needs.</p> <p><b>Ensuring Good Growth:</b> LBE shares TfL's commitment to achieving Good Growth in line with London Plan objectives. LBE believes that a phased, balanced approach, focusing on sustainable transport, active travel, and strategic land use planning will enable Crews Hill to develop as a well-connected, sustainable community. LBE remain open to further discussions with TfL to refine policy details and ensure the successful implementation of the Local Plan.</p> <p>LBE appreciates TfL's constructive feedback and look forward to continued collaboration to ensure that Crews Hill's development aligns with our shared vision for sustainability, connectivity, and Good Growth.</p>		

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21.	Chase Park	<p>It is claimed in 3.10.2 that: 'The area is relatively well served by public transport, with three stations within an approximately 30-minute walk, and two further stations within a 45-minute walk. It also has regular bus services running through and around the area.' This does not reflect TfL's view. A 30-45 minute walk to a station is not considered to provide good access and when measured on WebCat the PTAL for most of the proposed development area is la to lb with parts of the proposed placemaking area recording PTAL 0. As such, it cannot be substantiated that there are a genuine choice of modes as required by the National Planning Policy Framework.</p> <p>Our comments are very similar to those on Crews Hill (PL9). The two nearest stations to Chase Park - Gordon Hill and Enfield Chase are currently served</p>	<p>TfL officers have been involved in initial discussions with Enfield Council officers and their consultants regarding sites at Crews Hill and Chase Park. In those discussions TfL has raised concerns with the Council about the lack of detail on transport proposals, the need for car parking to be limited, and the costs and feasibility of providing the level of public transport provision which would be necessary to support Good Growth in line with the London Plan.</p> <p>The lack of a costed and agreed Infrastructure Delivery Plan for the two sites is a particular concern. From documents seen to date, Enfield's consultants have substantially underestimated the costs of providing new bus services, indicating that the level of service suggested in the placemaking strategies may not be deliverable.</p> <p>Further detail is needed to fully understand the nature of the developments, trip generation and mode share. For example, the provision of car parking will have considerable bearing on demand for buses and therefore materially impact the viability of any services provided. Other elements of any proposed development will impact how future residents choose to travel, including residential densities, the provision of local amenities and the design of the environment for walking and cycling.</p> <p>Even if the proposed options for bus services were deliverable, the PTAL would still only range from lb to 2 across most of the area with a very small enclave of 3/4 in the southwestern tip of the area</p>	<p>The information supporting this placemaking area are appropriate to the nature of the policy and the lifespan of the site allocation. It should be noted that since this representation Enfield Council has published an updated IDP which includes detailed infrastructure requirements to guide the development of Supplementary Planning Documents and proposals for the site.</p> <p>LBE is looking forward to working with TfL on developing cost effective sustainable transport solutions as part of the Supplementary Planning Document guidelines. Enfield and TfL bus colleagues have since discussed and identified possible bus solutions for the site.</p> <p>LBE acknowledges the bus services currently serve A110 to the south of the site and effort is required to plan for services through the Chase Park placemaking area. LBE is keen to work with TfL to develop a phased approach to improving public transport services in this area, understanding the scale of the challenge and outcomes in terms of PTAL. LBE is keen to ensure Chase Park is better liked to local centers and services and to work with TfL and Developer partners to secure a sound plan and financial coverage. An updated IDP has been published 30 September 2024.</p> <p>Chase Park placemaking area is not dissimilar to the surrounding residential areas in Enfield, LBE is working through its programme Journey and Places to promote active and sustainable travel in the</p>	<p>While we note the updated IDP published on Enfield's website on 30 September 2024, TfL was <u>not</u> consulted prior to its publication.</p> <p>To ensure that the Plan is sound and can be delivered, the IDP should include indicative costs and timescales for the public transport service and infrastructure requirements that need to be agreed with TfL (and other stakeholders, where appropriate) to ensure that they can be fully funded through S106 and CIL as proposed and delivered upfront to enable the development to be sustainable.</p> <p>In addition, public transport and active travel infrastructure should be considered essential/critical to the delivery of the Plan.</p> <p>There is no mention in the IDP regarding implementation of car parking controls and car clubs to enable a sustainable mode share target.</p> <p>We do not accept that car parking can be decided on a site by site basis. There needs to be a commitment in the placemaking policies in the Local Plan to car parking restraint below London Plan maximum standards across the whole placemaking area to ensure that public transport provision is viable and that the mode share target of 75 per cent across Chase Park as a whole can be met.</p> <p>Supplementary Planning Documents can provide details on implementation of policy and do not create policy themselves, so it is essential that the Local Plan policy should include some principles and key parameters in terms of</p>	<p>LBE acknowledges and appreciates the extensive issues TfL have raised regarding public transport connectivity, density, car parking standards, and sustainable development within the proposed placemaking area.</p> <p><b>Public Transport Connectivity and Accessibility Challenges:</b> LBE acknowledges the challenges associated with the low Public Transport Accessibility Level (PTAL) across much of Chase Park. LBE is committed to addressing this by collaborating with TfL, developers, and other key stakeholders to deliver phased, cost-effective solutions for public transport improvements. LBE understands that significant investment will be necessary to improve connectivity and reduce car dependency, and this forms a core element of Enfield's placemaking strategy. While it is acknowledged that achieving a PTAL comparable to urban areas is challenging, LBE aims to maximise accessibility improvements through strategic transport planning and investments.</p> <p><b>Phased Approach to Public Transport Solutions:</b> LBE has already engaged with TfL bus colleagues to identify potential solutions and will continue these efforts as part of our masterplanning processes. While LBE recognises that providing new or diverted bus services in this area is complex and requires careful planning, LBE's approach is designed to ensure incremental improvements that align with broader public transport</p>	<p>Refer to TfL response in rows for SS1 Spatial Strategy and SP PL9/SP PL11</p>	<p>LBE's responses are set out as part of SS1 and PL10, in relation to Chase Park. LBE has nothing further to add.</p>

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		<p>by Great Northern services between Hertford North and Moorgate. The only bus services in this area are around the fringes and the provision of new or diverted services is likely to be costly and inefficient compared to the costs of incremental improvements elsewhere. There are no proposed transport projects to improve access or capacity either in this policy or in policy T1.</p> <p>With such a low level of public transport connectivity either current or planned, the development of this area would be likely to be car dependent. This would exacerbate problems of road network capacity. It is very unlikely that the design, form and layout of transport infrastructure could create a place where walking, cycling and use of public transport is the natural choice even if this were affordable. For London to grow sustainably an integrated approach to land</p>	<p>closest to Oakwood station. By contrast most of the urban placemaking areas in the borough comprise areas of PTAL 3 - 6, or there are existing commitments and funding to provide public transport improvements. Therefore, limited weight should be attached to part 15c of the policy which suggests that it will be possible to provide 'improvements to public transport accessibility through an expanded bus network through working with TfL to achieve their aim of all Londoners living within 400m of a bus stop.'</p> <p>TfL has concluded, based on the proposals seen to date that there is no clear way to ensure all housing and facilities in the development would be within 400 metres of the bus network and that many of the bus service suggestions would not provide value for money because they would result in excess capacity on other parts of the route. Developer contributions are only for a time limited period, and it is essential that bus services meet key criteria and are viable in the long-term. The current lack of bus services and local amenities in Chase Park needs to be addressed with realistic proposals that can be funded along with a more restrictive car parking approach to make public transport and active travel an attractive and genuinely realistic travel option for the majority of residents. Although the policy in principle recognises the importance of active travel, walking and cycling here will not be viable options unless all the active travel infrastructure providing links to local services and amenities are in place before</p>	<p>borough. A similar approach can be taken in Chase Park placemaking areas, ensuring suitable sustainable travel alternatives are provided for local journeys. LBE will continue to work with TfL throughout the examination process and the development of Supplementary Planning Documents for the areas of Crews Hill (PLII) and Chase Park (PLI0) to resolve any outstanding issues/concerns. Further detail on the strategy to provide high frequency sustainable modes of transport to these areas have since been discussed between LBE and TfL bus colleagues. The updated Infrastructure Development Plan (IDP) published 30 September 2024 contains details of infrastructure requirements for both PLII and PLI0 in line with latest discussions.</p> <p>SP PL10 currently assumes site allocation follows London Plan Policy T6 residential car parking and car ownership assumed in the STA is comparable to existing surrounding areas, this assumption has been agreed with the TfL strategic modelling team as a robust representation of the proposed development at the time the models were undertaken. LBE deems current assumption in line with the London Plan policy appropriate, and will consider a phased, more controlled approach to car parking on a site by site basis.</p> <p>The information supporting this placemaking area are appropriate to the nature of the policy and the lifespan of the site allocation. It should be noted that since this representation Enfield Council</p>	<p>optimal densities across the areas, maximum car parking standards, and building height ranges. The current policy should require a car parking strategy that requires parking restraint and use of car clubs to allow for mode choice when needed.</p> <p>PL10 needs to be amended to confirm that an SPD for Chase Park will be produced to match the commitment for Crews Hill in PL11.</p> <p>While we note the updated IDP published on Enfield's website on 30 September 2024, TfL <u>was not</u> consulted prior to its publication.</p> <p>To ensure that the Plan is sound and can be delivered, the IDP should include indicative costs and timescales for the public transport service and infrastructure requirements that need to be agreed with TfL (and other stakeholders, where appropriate) to ensure that they can be fully funded through S106 and CIL as proposed and delivered upfront to enable the development to be sustainable.</p> <p>In addition, public transport and active travel infrastructure should be considered essential/critical to the delivery of the Plan.</p> <p>Any development on Green Belt (and its release) must be appropriate in terms of its location, density, and sustainability. Such development should be enabled through mechanisms to optimise densities that ensure the best use of land and create liveable neighbourhoods with provision of active travel and public transport.</p>	<p>objectives. The updated Infrastructure Delivery Plan (IDP), published on 30 September 2024, outlines initial infrastructure requirements and demonstrates our commitment to long-term public transport enhancements.</p> <p><b>Optimising Densities and Car Parking Standards:</b> LBE agrees that a balanced approach to densities and car parking is critical for achieving sustainable growth. LBE is committed to ensuring that development within Chase Park adheres to optimal density targets, as outlined in the Local Plan, while taking into consideration site-specific characteristics. In line with London Plan Policy T6, LBE intend to develop a car parking strategy that promotes restraint, encourages car club use, and supports active travel alternatives. This approach will be reflected in the masterplan and implemented with a focus on reducing car dependency over time.</p> <p><b>Commitment to Mode Share Targets and Sustainable Travel:</b> LBE recognise TfL's concerns regarding the feasibility of achieving a 75 per cent sustainable mode share target for Chase Park. LBE is committed to providing evidence-based strategies and working collaboratively with TfL to refine these targets where necessary. LBE's efforts will include enhancing active travel infrastructure, improving public transport connectivity, and developing measures that promote walking and cycling, with the goal of reducing reliance on private vehicles.</p> <p><b>Indicative Costs, Timescales, and Funding:</b> LBE</p>		



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		<p>use and transport would be necessary to achieve a 75 per cent outer London mode share for walking cycling and public transport (to achieve a city-wide target of 80 per cent). The focus for large scale mixed use development should be on growth corridors, town centres and Opportunity Areas, where there is more prospect of planned investment in the public transport network. There is a real risk of creating a suburban extension that does not function as an integral part of the existing built up area and is incompatible with the Mayor's transport objectives. Although we understand that further assessment work is underway to try to establish transport impacts and mitigation, we are not confident that the poor public transport connectivity and consequent reliance on car use could be overcome even with substantial</p>	<p>any of the residential units are occupied.</p> <p>Part 14 of the policy states that 'Development proposals should set out how the ambition of 75 per cent sustainable transport mode share (as set out in the London Plan) for the Chase Park Placemaking Area will be achieved including how the London Plan car and cycle parking standards will be achieved. Development should provide limited residential parking to promote active travel.'</p> <p>While a target for mode share is welcomed, TfL is not currently convinced that such a development as proposed in this location is likely to be able to achieve the 75 per cent target - and we need to see more evidence to support the target. We would note that most of the site is remote from existing services and public transport and while there is potential for some connections to existing public transport services, the costs of providing the necessary transport infrastructure and services from the outset is likely to be high. It should be noted that even with the proposed bus service improvements most of the site would have a PTAL of 2 or less and so 3+ bed housing would be permitted up to 1.5 car parking spaces. This contrasts with the car free development or very low levels of parking that can be provided in the well-connected urban placemaking areas in the borough.</p> <p>Enfield's transport modelling work shared with TfL has assumed car ownership of 1.15 cars per dwelling. This contrasts with other major</p>	<p>has published an updated IDP which includes detailed infrastructure requirements to guide the development of Supplementary Planning Documents and proposals for the site.</p> <p>LBE is looking forward to working with TfL on developing cost effective sustainable transport solutions as part of the Supplementary Planning Document guidelines. Enfield and TfL bus colleagues have since discussed and identified possible bus solutions for the site.</p>	<p>The urban edge of Enfield around the Chase Park Placemaking Area comprises typical 1930s suburban homes – a mixture of detached and semi-detached properties</p> <p>with large rear and often front, gardens. Car-dependent and low density development (currently at 20-22 dwelling units per hectare gross density across green belt strategic sites) does not represent Good Growth and 'wastes' land that is released.</p> <p>Supplementary Planning Documents can provide details on implementation of policy and do not create policy themselves, so it is essential that the Local Plan policy should include some principles and key parameters in terms of optimal densities across the areas, maximum car parking standards, and building height ranges. The current policy should require a car parking strategy that requires parking restraint and use of car clubs to allow for mode choice when needed.</p> <p>The modelling assumptions based on current trends and existing surrounding areas which are low density and car dependent do not reflect the vision of the Local Plan, TfL is concerned about the premise of the proposed development which currently risks being low density and car dependent. Current levels of car use in the area will not result in the sustainable development and sustainable mode share target that the Plan commits to. London Plan policies should be considered as a whole to</p>	<p>acknowledges the need for detailed costing and delivery timelines for public transport services and infrastructure within the IDP. LBE will continue to work closely with TfL to refine these details, ensuring that funding mechanisms, including Section 106 agreements and Community Infrastructure Levy (CIL), are aligned with infrastructure needs. LBE's goal is to provide a clear and actionable plan that supports sustainable development while maintaining flexibility for market conditions and funding availability.</p> <p><b>Masterplanning Commitment:</b> We are committed to preparing masterplan that is agreed by the Council for Chase Park to provide detailed guidance on policy implementation, including transport infrastructure, densities, and car parking standards. While masterplans cannot create policy, they will serve as a mechanism to ensure cohesive and comprehensive development across the placemaking area. LBE will engage with TfL and other stakeholders throughout this process to address outstanding issues and align with strategic growth objectives.</p> <p><b>Coordination and Duty to Cooperate:</b> LBE remains committed to fulfilling our Duty to Cooperate obligations. LBE assure TfL that future iterations will be developed in full coordination with TfL and other stakeholders to ensure alignment with transport priorities and infrastructure needs.</p>		

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		<p>investment. As it stands, TfL would be likely to raise strong objections to this policy on strategic transport grounds.</p>	<p>development sites within urban areas where car ownership is assumed to be between 0 and 0.2 cars per dwelling. In terms of localised impacts, the transport modelling predicts an increase of up to 225 additional new vehicles in the morning peak on The Ridgeway/Hadley Road/Enfield Road and 145 in the evening peak. The modelling work found that 'Delays at access points to the network are high for Crews Hill and Chase Park, more detailed work on how these trips access the highway network required'.</p> <p>We have concerns similar to Crews Hill regarding insufficient information on how development will be coordinated across the placemaking area and that identifying four separate site allocations does not provide confidence that a comprehensive and integrated development that is car-lite across the placemaking area can be achieved. The result of the proposed urban extension at Chase Park is likely to be car dominated development from the outset which is contrary to the Good Growth objectives set out in the London Plan.</p> <p>The very high costs of providing the necessary transport infrastructure and services to support such an urban extension could also prejudice the ability to secure other London Plan and Local Plan priorities including affordable housing and social infrastructure. We have so far not seen the evidence to suggest that key Good Growth objectives could be achieved in practice.</p>		<p>provide Good Growth and not just the maximum car parking standards in the London Plan for current PTAL of 0-1 which is 1.5 cars per dwelling unit. There is a risk of such levels of parking provided with piecemeal development within the green belt sites. The effects of this could be worse than the tested scenario.</p> <p>We do not accept that car parking can be decided on a site by site basis. There needs to be a commitment in the placemaking policies in the Local Plan to car parking restraint below London Plan maximum standards across the whole placemaking area to ensure that public transport provision is viable and that mode share targets can be met.</p> <p>While we note the updated IDP published on Enfield's website on 30 September 2024, TfL <u>was not</u> consulted prior to its publication as part of Duty to Cooperate discussions..</p> <p>To ensure the Plan is sound, the IDP should include indicative costs and timescales for the public transport service and infrastructure requirements that need to be agreed with TfL (and other stakeholders, where appropriate) to ensure that they can be fully funded through S106 and CIL as proposed and delivered upfront to enable the development to be sustainable.</p> <p>In addition, public transport and active travel infrastructure should be considered essential/critical to the delivery of the Plan.</p> <p>There is no mention in the IDP regarding implementation of car parking controls and car</p>	<p>LBE shares TfL's commitment to Good Growth principles and is determined to ensure that development within Chase Park aligns with sustainability, accessibility, and connectivity goals. LBE look forward to continued collaboration to address outstanding challenges and to deliver a comprehensive, well-integrated placemaking area that benefits both current and future residents.</p>		

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					<p>clubs to enable a sustainable mode share target.</p> <p>We do not accept that car parking can be decided on a site by site basis. There needs to be a commitment in the placemaking policies in the Local Plan to car parking restraint below London Plan maximum standards across the whole placemaking area to ensure that public transport provision is viable and that the mode share target of 75 per cent across Chase Park as a whole can be met.</p> <p>Supplementary Planning Documents can provide details on implementation of policy and do not create policy themselves, so it is essential that the Local Plan policy should include some principles and key parameters in terms of optimal densities across the areas, maximum parking standards, and building height ranges. The current policy should require a car parking strategy that requires parking restraint and use of car clubs to allow for mode choice when needed.</p>			
22.	SP SCI Improving health and wellbeing of Enfield's diverse communities	We welcome reference in part 1a to contributions to the provision of access to sustainable modes of travel, including safe cycling routes, attractive walking routes and easy access to public transport to reduce car dependency. However, it would be helpful to confirm support	We reiterate our comment that it would be helpful to confirm support for the Healthy Streets Approach to ensure consistency with other sections of the Local Plan.	Noted	We would like this point to be addressed through proposed minor modifications.	<p>LBE appreciates TfL's recognition of Enfield's commitment to promoting access to sustainable modes of travel, including safe cycling routes, attractive walking routes, and easy access to public transport to reduce car dependency.</p> <p>LBE acknowledges TfL's recommendation to explicitly confirm support for the Healthy Streets Approach within Policy SC1. LBE agree that this would enhance consistency with other sections of the Local Plan and reinforce our shared commitment to creating</p>	Noted	<p>LBE proposes modifications [E6] to Policy SC1 to integrate explicit support for the Healthy Streets Approach while maintaining alignment with the strategic objectives of the Local Plan.</p> <p><b>Proposed Modification [E6]</b></p> <p>Part 1a access to sustainable modes of travel, including safe cycling routes, attractive walking routes and easy access to public transport, to reduce car dependency, <u>in alignment with the Healthy Streets Approach.</u></p>

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		for the Healthy Streets Approach to ensure consistency with other sections of the Local Plan.				<p>environments that encourage active travel, reduce car dependency, and improve community health and wellbeing.</p> <p>In line with our response to PQ23 of the Inspector's initial letter, we propose this as a modification. Incorporating explicit reference to the Healthy Streets Approach within Policy SC1 would further align with our strategic objectives for delivering healthier, more accessible, and sustainable communities.</p>		<p><b>Proposed addition [E6] to para 5.2</b></p> <p><u>The Healthy Streets Approach will guide the planning and design of development proposals to create safe, inclusive, and attractive environments that encourage walking, cycling, and the use of public transport. By embedding this approach within Policy SC1, the Council reinforces its commitment to reducing car dependency, improving air quality, and promoting physical and mental wellbeing for all residents.</u></p> <p>Proposed addition to para 5.6 to expand on the role of infrastructure delivery in supporting the Healthy Streets Approach, which discusses funding and securing obligations.</p> <p><u>"Infrastructure delivered on-site or through financial contributions will align with the principles of the Healthy Streets Approach, ensuring that development proposals promote active travel, sustainable transport, and inclusive public spaces that improve health and wellbeing."</u></p>
23.	SP BGI Enfield's Blue and Green Infrastructure Network	We welcome proposals for public realm improvements along main routes (e.g. AIO, A406 and AIOI) and at key stations and town centre gateways and for new crossings/bridges over the AIO, A406 and Lee Valley line to	The comments made in response to the Regulation 18 consultation remain valid.	Noted	We would like this point to be addressed through proposed minor modifications.	<p>LBE acknowledges TfL's recommendation for early engagement with relevant infrastructure providers, including TfL, to ensure the successful delivery of these improvements. Additionally, LBE recognise the importance of explicitly supporting the Healthy Streets Approach to maintain consistency across sections of the Local Plan.</p> <p>In line with our response to PQ23 of the Inspector's initial</p>	Noted	<p><b>Proposed modifications [E6] to BG1</b></p> <p>Proposed addition to BG1 in between part 1c and 1d:</p> <p><u>green and blue infrastructure improvements that enhance biodiversity, climate resilience, health and wellbeing, and sustainable connectivity, in alignment with the Healthy Streets Approach.</u></p>

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		<p>overcome east-west severance. It will important that there is early engagement with the relevant infrastructure providers and managers including TfL. It would also be helpful to confirm support for adoption of the Healthy Streets Approach to ensure consistency with other sections of the Local Plan.</p>				<p>letter, LBE will propose this as a minor modification to ensure the Plan is sound. This will involve incorporating explicit support for the Healthy Streets Approach within this policy, further demonstrating our commitment to enhancing Enfield's Blue and Green Infrastructure Network in a manner that aligns with broader sustainability and connectivity goals.</p>		<p><b>New clause in Part 2</b></p> <p><u>Future improvements to the Blue and Green Infrastructure Network will be planned and delivered in alignment with the Healthy Streets Approach, ensuring integration with sustainable transport, active travel, and community wellbeing objectives.</u></p> <p><b>Supporting text modifications</b></p> <p><b>Proposed addition to Para 6.6:</b></p> <p><u>Future enhancements to the Blue and Green Infrastructure Network will align with the principles of the Healthy Streets Approach, ensuring these spaces are well-connected to active travel routes, public transport, and inclusive public spaces. This alignment will promote healthier and more sustainable communities while supporting biodiversity and climate resilience.</u></p> <p><b>Proposed Addition to Paragraph 6.10:</b></p> <p><u>The Council's commitment to the Healthy Streets Approach further supports these benefits by creating safer, more inclusive spaces that encourage active travel, reduce car dependency, and enhance air quality. This approach integrates the principles of sustainable transport with the Blue and Green Infrastructure Network to deliver a healthier, more connected environment for all residents.</u></p>

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24.	SP DE1 Delivering a well-designed, high quality and resilient environment	We welcome the emphasis on high quality design led interventions in the public realm including references to movement in part 2d and public spaces in part 2f. However, it would be helpful to confirm support for adoption of the Healthy Streets Approach to ensure consistency with other sections of the Local Plan.	We welcome the reference to the Healthy Streets Approach in section 7.5 but the link should be to TfL guidance on Healthy Streets which is specific to London rather than the generic website. <a href="https://tfl.gov.uk/corporate/about-tfl/how-we-work/planning-for-the-future/healthy-streets">https://tfl.gov.uk/corporate/about-tfl/how-we-work/planning-for-the-future/healthy-streets</a>	Noted	We would like this point to be addressed through proposed minor modifications.	TfL's support for our emphasis on high-quality, design-led interventions in the public realm, including movement and public spaces are appreciated. LBE also acknowledge and welcome TfL's recommendation to align references to the Healthy Streets Approach more closely with TfL guidance specific to London.  To ensure consistency with the Local Plan's objectives and TfL's valuable input, LBE will propose a minor modification under PQ23 of the Inspector's initial letter. This modification will involve updating references to the Healthy Streets Approach to directly link to TfL's specific guidance, as recommended. LBE believe this adjustment will further enhance the Plan's commitment to delivering a high-quality public realm that supports sustainable movement and connectivity.	Noted	<b>Proposed modification Policy DE1, Part 1(d):</b> "d. <u>promote high-quality, design-led interventions in the public realm, including movement and public spaces, in alignment with the Healthy Streets Approach, using guidance specific to London provided by Transport for London (TfL).</u> "  <b>Supporting text modifications</b>  References to the Healthy Streets Approach can strengthen the connection between the policy and TfL guidance.
25.	DM DE7 Creating liveable, inclusive and quality public realm	We support the requirement for development to contribute to improving the quality of the public realm but again it would be helpful to confirm support in part 3 for adoption of the Healthy Streets Approach to ensure consistency with other sections of the Local Plan.	We welcome the added reference to the Healthy Streets Approach in part 2a.	Noted		LBE is pleased that the inclusion of the Healthy Streets Approach aligns with TfL's recommendations and supports consistency across the Local Plan. At this stage, LBE have no further modifications to propose and welcome continued collaboration to deliver high-quality, inclusive, and liveable public spaces.	Noted	

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26.	SP HI Housing Development Sites	N/A	We do not believe that sites at Chase Park (PLIO) SAIO.1 - SAIO.4, sites at Crews Hill (PLII) SAI.1-SAI.6, land opposite Enfield Crematorium RUR.01 and land between Camlet Way and Crescent West, Hadley RUR.02 are suitable sites for housing because of the very poor transport connectivity and the exceptional costs that would be incurred in providing access by sustainable modes of transport to a standard that would make them comparable to urban housing sites in the borough. If these sites were to come forward they are likely to result in car dependent development contrary to the Good Growth objectives of the London Plan and the N PPF.	LBE is aligned with TfL on Good Growth and London Plan policies, however LBE is seeking to provide improved transport connections and make the site allocations sustainable through IDP, Transport Strategy and placemaking policies – Crews Hill and Chase Park Topic Papers. LBE will consider site specific policies through further supplementary planning document evidence development. LBE will work with TfL to enable delivery of sustainable travel solutions at these sites.	We welcome further engagement with TfL to resolve outstanding concerns regarding the costs of and commitment to public transport provision	LBE is committed to delivering development that aligns with Good Growth principles and London Plan policies. LBE acknowledge the current challenges related to transport connectivity for these sites including Chase Park (PL10), Crews Hill (PL11), land opposite Enfield Crematorium (RUR.01), and land between Camlet Way and Crescent West, Hadley (RUR.02), due to transport connectivity and potential car dependency and are actively working to address these issues through a comprehensive approach. This includes:	Refer to TfL response in rows for SS1 Spatial Strategy and SP PL9/SP PLII	Refer to LBE's responses to SS1 and PL11.
27.	DM H4 Small Sites and Smaller Housing Development	N/A	In part 2a we recommend that the criteria 'sites with good public transport accessibility (e.g. PTAL 3-6)' is amended to avoid subjective terms like good or bad so that it reads 'sites with a PTAL of 3 - 6'.	Noted	We would like this point to be addressed through proposed minor modifications.	LBE appreciates TfL's recommendation to provide greater clarity by amending the wording in part 2a to specify 'sites with a PTAL of 3 - 6' rather than using the subjective term 'good public transport accessibility.'  LBE agrees that this change would enhance clarity and consistency within the policy. In line with LBE's response to PQ23 of the Inspector's initial letter, we will propose this as a minor modification to ensure the Plan is sound. This modification will help provide a clearer framework for small site development while maintaining our commitment to sustainable and accessible housing growth.		Suggested modifications [E6] to H4  Policy H4, part 2(a) Replace "good public transport accessibility" with a specific PTAL reference to align with TfL's recommendation.  <b>Modified Text for Policy H4, Part 2(a):</b> <u>"a. are located on sites with a Public Transport Accessibility Level (PTAL) of 3 to 6, ensuring appropriate access to sustainable transport options."</u>  <b>Supporting text modifications</b> The supporting text should clarify the reasoning behind specifying PTAL 3–6 and how this aligns with the Council's objectives for small site development and sustainable housing growth.  <b>Proposed Addition to Supporting Text</b> <u>The inclusion of PTAL 3–6 within Policy H4 provides a</u>

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								clear and objective measure of public transport accessibility for small site developments. This aligns with the Council's commitment to promoting sustainable and accessible housing growth while ensuring developments are well-integrated into existing transport networks.
28.	DM H9 Student Accommodation	N/A	In part 2a we recommend that the criteria 'are well- connected and have good levels of public transport accessibility (normally PTAL 4-6) and easily accessible by walking and cycling' is amended to avoid subjective terms like good or bad so that it reads 'are well-connected, have a PTAL of 4 - 6 and are easily accessible by walking and cycling'.	Noted	We would like this point to be addressed through proposed minor modifications.	LBE appreciates TfL's recommendation to clarify the criteria in part 2a by specifying 'a PTAL of 4 - 6' rather than using subjective terms like 'good levels of public transport accessibility.'  LBE agrees that this proposed change would improve clarity and precision within the policy framework. In line with our response to PQ23 of the Inspector's initial letter, we will propose this as a minor modification to ensure the Plan is sound. This adjustment will enhance consistency and provide a clearer basis for evaluating student accommodation proposals.		<p><b>Proposed Modification [E6] to Policy H9, Part 2(a):</b> Replace "good levels of public transport accessibility" with the specific PTAL reference suggested by TfL.</p> <p><b>Modified Text for Policy H9, Part 2(a):</b> "a. are located on sites with a Public Transport Accessibility Level (PTAL) of 4 to 6, ensuring excellent connectivity to sustainable transport options suitable for student needs;"</p> <p><b>Supporting Text Modifications</b></p> <p>The supporting text should explain the rationale for specifying PTAL 4–6 and how this aligns with the objectives of providing sustainable and accessible student accommodation.</p> <p><b>Proposed Addition to Supporting Text:</b> "The inclusion of PTAL 4–6 within Policy H9 provides a clear and objective measure of public transport accessibility for student accommodation. This approach ensures that developments are located in areas with excellent connectivity to public transport, promoting sustainable travel behaviours among students and reducing reliance on private vehicles."</p>



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29.	SP EI Employment and Growth	From a strategic transport perspective, TfL has concerns about the proposal in part 2b for 'the provision of new sites for industry and logistics and related functions (including mixed use developments) in urban areas accessible to the strategic road network alongside new locations for industrial and logistics development in appropriate parts of the Green Belt.' This approach could result in the creation of isolated car dependent employment locations that are not well connected by public transport or active travel. The priority in seeking locations for expansion should be existing well connected employment areas where use of sites can be intensified, together with sites in Opportunity Areas where access can be improved through committed transport proposals or low cost interventions. It is unlikely that	TfL reiterates its concern about the identification of employment sites in the Green Belt with relatively poor public transport connectivity including land east of junction 24 (RUR.04). This site is likely to be car dependent and difficult to serve by public transport or to reach by active travel. The site would therefore only be suitable for employment uses with very low staff to floorspace ratios and traffic generation to and from the site should not result in increases to road capacity that facilitate greater traffic volumes within London.	LBE acknowledges that there is a demand for employment land from industries reliant on good access to strategic road network. LBE have not considered detailed employment land uses associated with the site allocation. We note the comment and we welcome discussion on this at examination.	Noted.	<p>LBE acknowledges TfL's concerns about the potential for such sites to create car-dependent employment locations with relatively poor public transport connectivity. LBE recognise the importance of prioritizing well-connected employment areas and agree that intensifying use of sites within existing urban locations, alongside Opportunity Areas with committed transport improvements, remains a key focus for sustainable economic growth.</p> <p>However, LBE also notes the significant demand for employment land that benefits from good access to the strategic road network, particularly for certain industries that rely on logistics and transport connections. LBE believe a balanced approach is necessary to meet borough-wide employment and logistics needs, and this may include strategic Green Belt sites, subject to careful planning considerations and mitigation measures.</p> <p>LBE welcome further discussions during the examination to explore potential measures that could address connectivity and transport concerns, including sustainable travel options and innovative transport solutions, while ensuring that the Borough's employment land needs are met in a manner consistent with London Plan policies and Good Growth principles.</p> <p>LBE looks forward to continuing to work collaboratively with TfL to address outstanding issues and identify pathways to create</p>	Noted.	

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		<p>sites in the Green Belt would fulfil the criteria, particularly if they are more easily accessed by car than by public transport or active travel modes. TfL is particularly concerned about the employment site proposed at land east of junction 24 of the M25 (SA54) which is likely to be dependent on car access due to the proximity to the motorway junction and relatively poor public transport connectivity with a PTAL of 1a-b. tra 9.2 is incomplete as it fails to recognise the access and transport issues that would overwhelmingly favour option A to meet the Borough's industrial and logistics needs in the urban area. As it stands, TfL is likely to object on strategic transport grounds to option B which sets out to meet the Borough's industrial and logistics needs in the urban area and selected Green Belt sites.</p>				sustainable and well-integrated employment locations.		

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30.	SP E3 Protecting employment locations and managing change/E3 Strategic Industrial Land	We welcome encouragement of land for sustainable transport functions in Strategic Industrial Locations (SIL) although land may be required for sustainable transport functions outside SIL in accordance with the emerging Transport Land London Plan Guidance.	We reiterate our comments noting that land for sustainable transport functions may be required in locations beyond SIL as referenced in Policy SP TI.	Noted		LBE acknowledges the importance of ensuring adequate land provision for sustainable transport functions both within and outside of SIL to support a well-integrated and accessible transport network across the Borough. LBE remain committed to engaging with TfL and other stakeholders to identify appropriate opportunities and locations that align with strategic transport priorities and emerging guidance from the London Plan.  LBE looks forward to continued collaboration as we work together to support sustainable transport solutions that contribute to Good Growth and enhance connectivity for businesses and communities across Enfield.	Noted	
31.	EI2 Meridian Hinterlands	N/A	We note the proposal to 'Deliver a new mixed use access route or corridor to establish connectivity between Meridian Water and Edmonton Marshes, as well as the wider Lee Valley Regional Park.' Further clarity is needed on what form this route or corridor would take. An active travel corridor, for example, would be very different in its nature and potential impacts to a new route that was designed for public transport and/or cars.	Noted	Further clarity is needed on what is meant by a mixed use access route because the transport impacts of a new route open to vehicles would need to be fully assessed before it is included as a proposal in the Local Plan.	The intent of the policy is to enhance connectivity and accessibility in a manner that supports active travel, sustainable transport, and integration with the surrounding area. LBE recognise that different types of routes—such as active travel corridors versus those designed for public transport or vehicles—can have varied implications for transport and environmental impact.  The mixed use access route was granted consent as part of Strategic Infrastructure Works (ref: 19/02717/RE3), and is currently being implemented. The route is an active travel corridor that prioritises walking, cycling, and public transport, with limited access for general traffic. We are happy to share any further information needed	Noted.	

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						on the design and specification of the route.		
32.	SP TCI Promoting town centres	We support part 1d which refers to 'managing streets and spaces to facilitate pedestrian and cycle movement, improve links to surrounding areas and reduce traffic flows along key routes'. It would be helpful to add 'public transport' before links to clarify the intention of the policy.	We welcome the reference to public transport connections in response to our comments.	Noted		LBE recognises our shared commitment to promoting sustainable transport connectivity and enhancing accessibility within and around our town centres.  LBE remains dedicated to fostering vibrant, accessible, and well-connected town centres through continued collaboration with TfL and other key stakeholders.	Noted	
33.	SP TC2 Encouraging vibrant and resilient town centres	N/A	It would be helpful to amend part 2 to read 'All development must contribute positively to placemaking in town centres, including through supporting an attractive and accessible public realm that is safe (and perceived to be safe) for all to use during the day and night time...'	LBE notes the proposed modifications. If they are further proposed by the Inspector, LBE would be supportive of these modifications being made.	Agreed.	LBE acknowledges and appreciates TfL's recommendation. LBE note that TfL has agreed with Enfield's response indicating support for these modifications if proposed under PQ23 to make the plan sound. This approach aligns with our shared commitment to enhancing town centre vibrancy, accessibility, and safety, thereby contributing positively to placemaking across the borough.  LBE looks forward to continued collaboration as we implement policies that foster thriving and resilient town centres.		<b>Policy Text Modification [E6]</b>  <b>Proposed Modification to Policy TC2, Part 2:</b> Amend Part 2 of the policy to include the additional language recommended by TfL, ensuring alignment with objectives for enhancing the public realm.  <b>Modified Text for Policy TC2, Part 2:</b> "2. All development must contribute positively to placemaking in town centres, including through supporting an attractive and accessible public realm that is safe (and perceived to be safe) for all to use during both the day and night."

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								<p><b>Supporting Text Modifications</b></p> <p>Where the role of the public realm is discussed in creating successful town centres, an additional sentence can be added to highlight the importance of safety and perception of safety, as suggested by TfL.</p> <p><b>Proposed Addition to Supporting Text:</b>  <u>"Creating a public realm that is not only attractive and accessible but also safe, and perceived to be safe, during both the day and night is critical for fostering vibrant and inclusive town centres. Development proposals should prioritise these elements to support successful placemaking and enhance the town centre experience for all."</u></p>
34.	10.24/1 0.5.3	We welcome the statement that: 'Uses which are not considered suitable meanwhile uses include vehicle parking', although it would help to include this point within the policy.	N/A					
35.	SP RE3 Supporting the rural economy	We welcome the requirement in part 9b that development proposals should 'avoid a significant increase in the number of trips requiring the private car and facilitate the use of sustainable transport,	N/A					

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		including walking and cycling, where appropriate. Sustainable Travel Plans will be required to demonstrate how the traffic impacts of the development have been considered and mitigated'.						
36.	13.2	We welcome Enfield's commitment to meeting the Mayor of London's Transport Strategy objectives to deliver a transport network that improves the health and wellbeing of all Londoners and to achieve an 80% mode share for active and sustainable travel by 2041. We are pleased to see the requirement that development will be expected to contribute to these aims. However, it would be helpful to mention the Mayor's ambition to achieve Vision Zero and to give greater force to these requirements by including them within a policy rather than being	We welcome reference to 'the additional goal to have zero road deaths by the same year.'	Noted		LBE notes TfL's suggestion to elevate the prominence of these commitments by incorporating them directly into policy language rather than within explanatory text. While LBE is committed to embedding these key objectives across our strategic planning framework, LBE believe that their current inclusion in both narrative and applicable policies provides a balanced approach, ensuring these commitments guide development expectations while allowing for flexibility and detailed elaboration within specific policy contexts.  Furthermore, LBE remains focused on fostering tangible measures, initiatives, and partnerships to advance towards Vision Zero and promote active and sustainable travel. LBE welcome further dialogue on how to most effectively implement these commitments while ensuring alignment with broader planning goals and community needs.	Noted	

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		included solely in explanatory text.						
37.	SP TIA Sustainable and Decarbonised Transport System/Promoting sustainable transport	We broadly welcome the contents of this policy including the safeguarding of existing and future transport land, ensuring that major development contributes to the delivery of a wide range of transport projects including Crossrail 2 and new public transport infrastructure or services, as well as support for car free development or low levels of parking provision. However, it is important that the approach to parking states explicitly that London Plan maximum standards for car parking will be applied, to ensure compliance with London Plan policy T6. Any car parking should provide active electric vehicle charging points at a minimum of 20 per cent of spaces and the remaining 80 per cent should provide passive provision. Construction	We note that the approach to car parking is now dealt with in policies T2 and T3. We welcome reference to Construction Logistics Plans and Delivery and Servicing Plans in parts 3 and 6c, although it would be helpful to use the London Plan terminology of Construction Logistics Plans and Delivery and Servicing Plans on a consistent basis. We welcome the amendments made to expand the requirements for mitigation including parts 10 a and b, although it would be helpful to make clear that part 10b also applies where there is a need for additional rail station capacity. Bus priority measures, bus stands and bus drivers' facilities should be added to the list of bus network infrastructure in part 9a. As previously, we note the aspiration to provide frequency improvements on the Enfield Town/Cheshunt services, but we are unable to provide any sort of commitment to frequency improvements in the current funding climate. Our previous comments on the Crossrail 2 project still apply. There has been no change in status or safeguarding updates. We welcome the positive approach to supporting cycling set out in part 8, including reference to London Plan targets. However, it should be stated that the design of cycle routes should be in accordance with London Cycling Design Standards (LCDS). It would be helpful to confirm in part 8c that, as a minimum, London	Noted		LBE appreciates TfL's broad support for the policy, including the safeguarding of transport land, contributions to transport projects, and support for car-free or low-parking developments.  <b>Parking Standards and EV Charging:</b> LBE acknowledges the importance of aligning car parking standards with the London Plan's maximum standards and providing active and passive electric vehicle (EV) charging infrastructure. LBE recognise that this approach will support sustainable transport objectives and facilitate the transition to low-emission vehicles. LBE will continue to explore how best to reflect this alignment and EV provision through relevant policies such as T2 and T3.  <b>Construction Logistics and Delivery Plans:</b> LBE note TfL's recommendation to consistently use the London Plan terminology for Construction Logistics Plans and Delivery and Servicing Plans. LBE will ensure consistency in terminology across relevant policies to provide clarity for applicants and support effective mitigation of freight impacts.  <b>Mitigation and Public Transport Capacity:</b> TfL's feedback regarding the need for mitigation measures, including addressing rail station capacity and enhancing bus network infrastructure, is well-received. LBE acknowledge	Noted.  Regarding 'parking', please refer to our comments within SP PL9/SP PLII	Our response to Parking is set out in our response to PL11.  The Council fully supports the principle of sustainable mode share. However, we maintain that policies and associated parking strategies must reflect the realities of Enfield as an outer London borough.  Enfield's policies aim to achieve a balanced approach, supporting sustainable travel modes while acknowledging the necessity of car use in some areas.

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		<p>Logistics Plans and Delivery and Servicing Plans should be submitted alongside planning applications to detail how the impact of road based freight can be mitigated and maximum use made of the alternatives. The policy should also be explicit that mitigation in the form of new infrastructure or funding may be required to address the impact on rail stations or bus services in order to provide increased capacity or improved access. This does not just apply in areas of low public transport accessibility as suggested in part 2b, and includes stations such as Southbury, Enfield Town, Edmonton Green and Silver Street served by TfL Rail/London Overground where substantial growth is proposed. Bus priority measures should also be considered for funding as an incremental approach to improve journey</p>	<p>Plan cycle parking standards will need to be met and that it should be in accordance with LCDS including provision for adapted cycles and cargo bikes. Any provision for hire bikes/scooters should be in addition to cycle parking requirements.</p>			<p>that improvements must be considered holistically and will work to ensure that appropriate infrastructure is delivered to support growth. LBE will review and consider expanding references to bus priority measures, stands, and driver facilities within our policies to further support an efficient and reliable public transport network.</p> <p><b>Cycling Infrastructure and Standards:</b> LBE remains committed to promoting cycling as a key part of our sustainable transport network. LBE will consider TfL's suggestion to reference the London Cycling Design Standards (LCDS) and to ensure that cycle parking standards meet or exceed London Plan requirements, including adapted cycle and cargo bike provision. TfL's suggestion to treat hire bikes/scooters as additional to cycle parking standards will also be considered as LBE refine our policy framework.</p> <p><b>Crossrail 2 and Service Improvements:</b> LBE notes TfL's comments on the status of the Crossrail 2 project and ongoing limitations on service frequency improvements for the Enfield Town/Cheshunt routes. While LBE understands these constraints, we remain focused on pursuing opportunities for future improvements and ensuring that any updates to safeguarding are considered as part of site allocations.</p> <p>LBE is dedicated to fostering a sustainable, inclusive, and resilient transport system that aligns with the London Plan's objectives and broader Good Growth principles. LBE value our ongoing collaboration with</p>		



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		<p>times and reliability at a much lower cost than a full-scale transit project. We note the aspiration to provide frequency improvements on the Enfield Town/Cheshunt services. Although the potential for off peak improvements is being discussed with rail industry partners, this cannot be guaranteed at this point and remains subject to further consideration of its economic and financial case. We currently have no firm plan to increase peak service levels further but will keep this option under review. Currently our ability to enhance and invest in the West Anglia service is heavily constrained by the conditions of our latest funding deal with central government; the extent to which this constraint is relaxed depends on how well demand recovers. The current status of the Crossrail 2 project and any updates on safeguarding are available on the Crossrail 2</p>				<p>TfL and look forward to working together to refine and implement policies that support active travel, public transport, and the transition to low-emission mobility.</p>		

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		website. Some site allocations may be affected by safeguarding updates so these will need to be taken into account when they are published by the Secretary of State. http://www.enfield.gov.uk/news/updates/2024/01/18/						
38.	DM T2 Forming a healthy and connected Enfield/ Making active travel the natural choice	We broadly welcome the contents of this policy including the requirement for development to support the Healthy Streets Approach and improvements to walking and cycling access. However, the reference to journeys under 2 km is misleading as there is great potential to increase active travel, particularly cycling, over longer distances. We support the requirement in part 1e for development proposals to provide and ideally exceed minimum standards in respect of high quality short and long stay cycle parking provision on site, or contribute to offsite provision where this is not	We note that Policy T2 has been renamed 'Forming a healthy and connected Enfield' and that new Policy T3 'A vibrant and safe Enfield for everyone' has been added (see comments below on T3). We are pleased to see references to the Healthy Streets Approach in parts 1 and 2. We strongly support parts 2a and b which are aimed at 'prioritising measures that encourage a substantial shift from private car journeys to active transport modes' and 'creating or contributing to the creation of quieter neighbourhoods throughout the Borough, through the removal of road traffic and prioritising active travel measures over car journeys.' We welcome and support the statement in part 3 that the Council will limit the availability of parking by adhering to the London Plan parking standards as the maximum permitted but may consider further reductions in car parking based on local circumstances. The final sentence of part 3a should be clarified through the following minor modification 'This could include limiting on-site parking to spaces designated for disabled people where necessary, and/or essential	Noted	We would like to see these points addressed through proposed minor modifications.	LBE appreciates TfL's strong endorsement of the policy's aims to prioritise active travel, implement the Healthy Streets Approach, and limit car dependency in line with sustainable transport goals.  <b>Potential for Active Travel Beyond 2 km:</b> LBE acknowledges TfL's suggestion to reconsider references to journeys under 2 km. LBE agree that there is significant potential for active travel, particularly cycling, over longer distances. LBE is committed to ensuring that our policies encourage a broad uptake of cycling and walking, including for journeys beyond short distances, as part of our strategic objectives. LBE will propose a modification to reflect this as part of our response to PQ23.  <b>Cycle Parking Standards:</b> LBE appreciate your support for high-quality cycle parking and agree on the importance of referencing the London Plan cycle parking standards as a minimum requirement. LBE will ensure that our policy framework reflects this and continues to promote adherence to design guidance, such as the London Cycling	Regarding 'parking', please refer to our comments within SP PL9/SP PLII	The Council fully supports the principle of sustainable mode share. However, we maintain that policies and associated parking strategies must reflect the realities of Enfield as an outer London borough.  The Council will work with TfL to agree wording to ensure that our policies encourage a broad uptake of cycling and walking, including for journeys beyond short distances, as part of our strategic objectives and will be set out in the forthcoming modifications schedule [E6].

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		<p>feasible. Reference should be made here to the London Plan cycle parking standards being applied as a minimum requirement to be exceeded where possible and for the need to have regard to design guidance including the London Cycling Design Standards (LCDS) or any successor document. We welcome the reference in part le to the creation of quieter neighbourhoods through the removal of road traffic and prioritising active travel measures over car journeys. The reduction or removal of car traffic could also be applied to selected locations in town or district centres.</p>	<p>operational or servicing needs only.' We also welcome part 3b which prohibits the issue of parking permits in connection with new developments and part 3c 'considering the redevelopment of existing car parks for alternative uses.'</p>			<p>Design Standards (LCDS), to ensure optimal provision and design quality. LBE will propose this as a minor modification under PQ23.</p> <p><b>Quieter Neighbourhoods and Active Travel Priority:</b> LBE is committed to creating quieter, more pedestrian-friendly neighbourhoods, as reflected in the policy's focus on reducing road traffic and prioritising active travel. LBE will continue to explore opportunities for reducing or removing car traffic in town and district centres, consistent with Good Growth and Healthy Streets principles.</p> <p><b>Parking Standards and Reductions:</b> LBE acknowledges TfL's support for limiting the availability of parking through adherence to London Plan maximum standards and welcome TfL's recommendations for further clarification of the final sentence in part 3a regarding on-site parking. LBE remains committed to reducing car parking availability based on local needs and ensuring that new developments align with sustainable mobility goals. LBE will propose clarifications and modifications related to parking standards as part of our response to PQ23.</p> <p>LBE remains dedicated to forming a healthier, better-connected borough by prioritizing active travel and aligning closely with London Plan and Healthy Streets objectives. We value our continued collaboration with TfL and look forward to refining and implementing policies that foster sustainable transport, safer streets, and vibrant neighbourhoods.</p>		

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39.	T3 A vibrant and safe Enfield for everyone		We welcome the statement in part I that 'Development[s] that are well connected by public transport and have active travel opportunities should be designed as car-free or offer a very low level of parking provision which are appropriate to the proposed use of the development, in line with the standards set out within the London Plan' and that 'Developments should have well connected, high quality, convenient and safe active travel routes both within and extending beyond the development site. These routes should be easily navigable and safe, permeable and well lit.' We also welcome the requirement in Part 2 that Transport Assessments should include an Active Travel Zone Assessment and provide mitigation where appropriate. The wording should clarify that the Active Travel Zone Assessment must consider conditions during both the day and night-time. In Part 3 issues of safety should be widened to include personal security issues and measures to ensure that travel in the evenings and at night-time is safe for all. Reference should be made in the policy to the Mayor's strategy to eliminate Violence Against Women and Girls (VAWG). Design guidance such as GLA's Safety in Public Spaces: Women, Girls and Diverse People should also be referenced.	LBE notes the proposed modifications. If they are further proposed by the Inspector, LBE would be supportive of these modifications being made.	Agreed although it would be helpful to set out the proposed wording of the modifications for the benefit of the Inspector.	<p><b>Active Travel Zone Assessment:</b> LBE appreciates TfL's suggestion to clarify that Active Travel Zone Assessments must consider conditions during both the day and night-time. LBE acknowledges the importance of addressing all aspects of safety and accessibility, and we are supportive of making this modification for greater clarity, under PQ23.</p> <p><b>Widening Safety Considerations:</b> LBE recognises TfL's recommendation to expand references to safety to include personal security issues and measures to ensure safe travel during evenings and night-time for all users. LBE also acknowledges the value of referencing the Mayor's strategy to eliminate Violence Against Women and Girls (VAWG) and relevant design guidance, such as the GLA's "Safety in Public Spaces: Women, Girls and Diverse People," to strengthen our policy approach.</p> <p>LBE remains committed to ensuring that our policies comprehensively address the safety, security, and inclusivity of all residents and visitors. As noted in previous responses, LBE will be supportive of these modifications and are prepared to set out proposed wording adjustments to provide clarity and ensure the policy's effectiveness in line with the feedback received, under our response to PQ23.</p>		<p>Modification to Part 1: Active Travel Zone Assessment [E6]</p> <p><b>Proposed Text for Part 1:</b> "Developments that are well connected by public transport and have active travel opportunities should be designed as car-free or offer a very low level of parking provision, appropriate to the proposed use of the development, in line with the standards set out within the London Plan. Developments should have well-connected, high-quality, convenient, and safe active travel routes both within and extending beyond the development site. These routes should be easily navigable, safe, permeable, and well-lit, considering conditions during both the day and night."</p> <p><b>Modification to Part 2: Transport Assessments</b></p> <p><b>Proposed Text for Part 2:</b> "Transport Assessments should include an Active Travel Zone Assessment that considers conditions during both the day and night-time to ensure routes are safe, accessible, and inclusive. Where necessary, the Transport Assessment should identify appropriate mitigation measures to address safety, connectivity, and accessibility concerns."</p> <p><b>Modification to Part 3: Safety and Security</b></p> <p><b>Proposed Text for Part 3:</b> "Development proposals must address safety issues, including personal security, to ensure that all users can travel safely during the day, evening, and night-time. Proposals should demonstrate how they</p>

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								<p>contribute to the Mayor's strategy to eliminate Violence Against Women and Girls (VAWG) and should be informed by design guidance such as the GLA's 'Safety in Public Spaces: Women, Girls and Diverse People.' Measures should be incorporated to promote inclusivity and reduce barriers to safe travel for all."</p> <p><b>Supporting Text Modifications</b></p> <p>Expand the supporting text to elaborate on the importance of addressing personal security and ensuring safe travel at all times.</p> <p><b>Proposed Addition to Supporting Text:</b>  <u>"Safety and security considerations are vital to promoting active and sustainable travel. Active Travel Zone Assessments must evaluate conditions during both the day and night to identify potential risks and propose mitigation measures. Particular attention should be paid to personal security and inclusivity, ensuring that all users feel safe traveling at any time of the day or night. Development proposals should align with the Mayor's strategy to eliminate Violence Against Women and Girls (VAWG) and follow design guidance such as the GLA's 'Safety in Public Spaces: Women, Girls and Diverse People,' to promote safer public spaces for all."</u></p>

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40.	SP DI Securing contributions to mitigate the impact of development	To ensure consistency with London Plan policy DF1 D, contributions towards public transport improvements should be given equal key priority status with affordable housing. Public transport and active travel improvements are essential enablers of growth and will contribute to other identified priorities including tackling climate change and improving public health.	We reiterate that contributions towards public transport improvements should be given equal priority status with affordable housing to ensure consistency with the London Plan. Contributions towards public transport will be necessary to enable development to occur in the Placemaking areas as set out in individual policies for these areas and this should be reflected in the infrastructure priorities in the Infrastructure Delivery Plan.	Noted	This point needs to be addressed through a proposed modification to the wording of Policy SP DI to ensure consistency with the London Plan.	LBE recognises the critical role of public transport and active travel improvements in enabling sustainable growth and contributing to broader priorities such as tackling climate change and improving public health. LBE acknowledges TfL's recommendation and, as part of our response to PQ23, we will propose a modification to Policy SP DI to reflect this alignment with London Plan priorities and ensure clarity in the Infrastructure Delivery Plan.		<p><b>Policy Text Modification [E6]</b></p> <p>Addition to Policy SP D1, Part 1:</p> <p><b>Proposed Text for Part 1:</b>  <u>"1. Development proposals must contribute to the provision of infrastructure and services to mitigate the impacts of development, support sustainable growth, and meet the needs of Enfield's communities. Contributions will be prioritised to deliver affordable housing, public transport and active travel improvements, and other critical infrastructure, as identified in the Infrastructure Delivery Plan."</u></p> <p>In part 3 of the policy, LBE seeks to clarify the role of public transport in placemaking and its link to development viability.</p> <p><b>Proposed Text for Part 3:</b>  <u>"3. Contributions towards public transport improvements will be required, particularly within placemaking areas, to enable development to proceed and ensure that sustainable transport infrastructure supports growth. These contributions must align with the priorities identified in the Infrastructure Delivery Plan and the London Plan."</u></p> <p><b>Supporting Text Modifications</b></p> <p>Expand the supporting text to explain the importance of public transport contributions and their alignment with the London Plan.</p> <p><b>Proposed Addition to supporting text:</b>  <u>"Public transport improvements are critical to enabling</u></p>

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								<p><u>sustainable growth and ensuring developments are well-connected and accessible. These contributions will be prioritised alongside affordable housing to align with London Plan objectives, supporting placemaking policies and addressing infrastructure needs identified in the Infrastructure Delivery Plan. By securing contributions for public transport and active travel infrastructure, the Council aims to tackle climate change, improve public health, and promote sustainable travel choices."</u></p>

**Table 2 Specific suggested edits and comments from TfL on the Enfield Reg. 19 draft local plan site allocations and LBE's response**

	Section	TfL Reg-18 comment	TfL Reg-19 comment	Enfield Response August 2024	TfL response September-November 2024	Enfield Response 20 December 2024
1.	SA1. 1 Palace Gardens Shopping Centre	N/A	We welcome the requirement that the development must contribute towards improvements to the facilities at Enfield Town station although we can give no commitment towards increased peak hour frequencies. We also welcome the requirement that it must deliver car free development which is consistent with the London Plan taking account of the PTAL of up to 6a.	Noted		<p><b>Existing Wording:</b></p> <p>ii) "The development must contribute towards improvements to the facilities at Enfield Town station."</p> <p><b>Proposed Modification to SA1.1:</b></p> <p>ii) "The development <u>must contribute towards improvements to the facilities at Enfield Town station, enhancing accessibility and user experience in consultation with Transport for London (TfL).</u>"</p>
2.	SA1.2 Enfield Town Station and former Enfield Arms	N/A	<p>Early consultation should take place with TfL about any development proposals for this site that may affect station access, management of the station or London Overground operations.</p> <p>We welcome the requirement that the development must improve pedestrian and cycle routes to Enfield Town Overground station and facilitate improvements to the facilities at Enfield Town station although we can give no commitment towards increased peak hour frequencies.</p> <p>We welcome the requirement that the development must limit vehicular access to drop off, servicing and accessible bays. However, the wording should be amended to clarify that this means car free development to ensure consistency with the London Plan taking account of the PTAL of up to 6.</p>	LBE notes the proposed modifications (in the appendix). If they are further proposed by the Inspector, LBE would be supportive of these modifications being made.		<p><b>Existing Wording:</b></p> <p>ii) "Development must improve pedestrian and cycle routes to Enfield Town Overground station</p> <p>iii) Facilitate improvements to the facilities at Enfield Town station.</p> <p>J) Vehicular access should be limited to drop-off, servicing and accessible bays."</p> <p><b>Proposed Modification to SA1.2:</b></p> <p>"Development:</p> <p>ii) <u>must improve pedestrian and cycle routes to and from Enfield Town Overground station to support active and sustainable travel;</u></p> <p>iii) <u>must facilitate improvements to station facilities in consultation with Transport for London (TfL) to ensure operational requirements and access management are considered;</u></p> <p>J) <u>must limit vehicular access to drop-off, servicing, and accessible bays, and must deliver car free development taking into account the site's PTAL of up to 6 and the specific constraints and needs of Enfield Town. ."</u></p>



	Section	TfL Reg-18 comment	TfL Reg-19 comment	Enfield Response August 2024	TfL response September-November 2024	Enfield Response 20 December 2024
3.	SA1.3 Tesco Southbury Road	N/A	<p>We welcome the requirement that the development must improve pedestrian and cycle routes to Enfield Town station and should facilitate improvements to the facilities at Enfield Town station, However, the wording needs to be amended from 'should facilitate improvements' to 'must facilitate improvements' so that it is consistent with SAI.1 and SAI.2. As stated above we can give no commitment towards increased peak hour frequencies.</p> <p>We note the requirement that the development should provide Limited parking. This should be amended to say that parking must be minimised and that this applies to all proposed uses including residential and the reprovided retail store to ensure consistency with the London Plan.</p>	LBE notes the proposed modifications. If they are further proposed by the Inspector, LBE would be supportive of these modifications being made.	Noted and welcomed.	<p><b>Existing Wording:</b></p> <p>ii) "Development should improve pedestrian and cycle routes to Enfield Town Overground station and should facilitate improvements to the facilities at Enfield Town station."</p> <p>J) "The development should provide limited parking."</p> <p><b>Proposed Modification to SA1.3:</b></p> <p>ii) "<u>Development must improve pedestrian and cycle routes to and from Enfield Town Overground station and must facilitate improvements to the facilities at Enfield Town station, in consultation with Transport for London (TfL).</u>"</p> <p>J) "<u>Parking must be car free across all proposed uses, including residential and the reprovided retail store, to ensure alignment with the London Plan and the site's PTAL of up to 6.</u>"</p>
4.	SA1.4 Enfield Civic Centre	N/A	<p>We welcome the requirement that the development facilitate improvements to the facilities at Enfield Town station. However, the wording needs to be amended from 'facilitate improvements' to 'must facilitate improvements' so that it is consistent with SAI.1 and SAI.2. As stated above we can give no commitment towards increased peak hour frequencies.</p> <p>We note the requirement that the development should provide limited parking. This should be amended to say that parking must be minimised and that this applies to all proposed uses including residential and the re-provided civic centre to ensure consistency with the London Plan.</p>	LBE notes the proposed modifications. If they are further proposed by the Inspector, LBE would be supportive of these modifications being made.	Noted and welcomed.	<p><b>Existing Wording:</b></p> <p>iv) "Development should facilitate improvements to the facilities at Enfield Town station."</p> <p>J) "The development should provide limited parking."</p> <p><b>Proposed Modification to SA1.4:</b></p> <p>iv) "<u>Development must facilitate improvements to the facilities at Enfield Town station, in consultation with Transport for London (TfL), to ensure operational needs and public benefit are fully addressed.</u>"</p> <p>J) "<u>Parking must be car free across all proposed uses, including residential and the re-provided Civic Centre, to ensure consistency with the London Plan and the site's PTAL rating of up to 6.</u>"</p>

	Section	TfL Reg-18 comment	TfL Reg-19 comment	Enfield Response August 2024	TfL response September-November 2024	Enfield Response 20 December 2024
5.	SAI.5 St Anne's Catholic High School for Girls	N/A	Although we welcome the requirement that it should be a car free development, this should be amended to 'must be a car free development' to ensure consistency with the London Plan taking account of the PTAL of up to 5.	LBE notes the proposed modifications. If they are further proposed by the Inspector, LBE would be supportive of these modifications being made.	Noted and welcomed.	<p><b>Existing Wording:</b></p> <p>H) "The development should be a car free development."</p> <p><b>Proposed Modification to SA1.5:</b></p> <p>H) "The development <u>must be a car-free development, reflecting the site's PTAL rating of up to 5 and ensuring alignment with the London Plan.</u>"</p>
6.	SAI.6 100 Church Street Enfield	N/A	Although we welcome the requirement that it should be a car free development, this should be amended to 'must be a car free development' to ensure consistency with the London Plan taking account of the PTAL of up to 5.	LBE notes the proposed modifications. If they are further proposed by the Inspector, LBE would be supportive of these modifications being made.	Noted and welcomed.	<p><b>Existing Wording:</b></p> <p>G) "The development should be a car free development."</p> <p><b>Proposed Modification to SA1.6:</b></p> <p>G) "The development <u>must be a car-free development, reflecting the site's PTAL rating of up to 5 and ensuring alignment with the London Plan.</u>"</p>
7.	SA1.7 Oak House, 43 Baker Street	N/A	We note the requirement that the development should provide Limited residential parking. This should be amended to say that parking must be minimised to ensure consistency with the London Plan.	LBE notes the proposed modifications. If they are further proposed by the Inspector, LBE would be supportive of these modifications being made.	Noted and welcomed.	<p><b>Existing Wording:</b></p> <p>I) "The development should provide Limited residential parking."</p> <p><b>Proposed Modification to SA1.7:</b></p> <p>I ) "The development <u>must minimise residential parking to align with the London Plan and promote sustainable travel options.</u>"</p>
8.	SA2.1 Colosseum Retail Park	N/A	<p>We note the requirement that the development should provide limited parking. This should be amended to say that parking must be minimised and that this applies to all proposed uses including residential and commercial to ensure consistency with the London Plan.</p> <p>We support streetscape improvements but any proposals affecting the A10 or its frontage should be agreed with TfL. We would welcome improvements that overcome existing problems of severance. There should be no direct vehicle access (to parking or servicing) from the A10.</p>	LBE notes the proposed modifications. If they are further proposed by the Inspector, LBE would be supportive of these modifications being made.	Noted and welcomed.	<p><b>Existing Wording:</b></p> <p>B. must provide streetscape improvements along the A10, Southbury Road, Baird Road and Dearsley Road, for example wider footpaths, tree planting, and the incorporation of street furniture. Improvements along the A10 and Southbury Road must maximise tree planting to create a green buffer.</p> <p>N. should provide limited parking to promote active travel. If required, on-street parking is preferred and should be integrated into the public realm, interspersed with tree planting. Any</p>

	Section	TfL Reg-18 comment	TfL Reg-19 comment	Enfield Response August 2024	TfL response September-November 2024	Enfield Response 20 December 2024
						<p>podium parking must not create long stretches of inactive building frontage.</p> <p><b>Proposed Modification to SA2.1:</b></p> <p>B: "<u>Parking must be minimised across all proposed uses, including residential and commercial, to align with the London Plan and the site's accessibility to sustainable transport options.</u>"</p> <p>N: "<u>Streetscape improvements must be delivered, with a focus on overcoming existing severance issues. Any proposals affecting the A10 or its frontage must be agreed with Transport for London (TfL), and there must be no direct vehicle access (for parking or servicing) from the A10.</u>"</p>
9.	SA2.3 Morrisons Southbury Road		<p>We welcome the requirement that the development should contribute towards improvements to the facilities at Southbury station.</p> <p>We note the requirement that the development should provide limited parking. This should be amended to say that parking must be minimised and that this applies to all proposed uses including residential, commercial and re-provision of the retail store to ensure consistency with the London Plan.</p> <p>We support streetscape improvements but any proposals affecting the A10 or its frontage should be agreed with TfL. There should be no direct vehicle access (to parking or servicing) from the A10.</p>	LBE notes the proposed modifications. If they are further proposed by the Inspector, LBE would be supportive of these modifications being made.	Noted and welcomed.	<p><b>Existing Wording:</b></p> <p>ii) "The development should contribute towards improvements to the facilities at Southbury station."</p> <p>B) "Streetscape improvements should be delivered."</p> <p>J) "The development should provide limited parking."</p> <p><b>Proposed Modification to SA2.3:</b></p> <p>ii) "<u>The development must contribute towards improvements to the facilities at Southbury station to enhance accessibility and connectivity.</u>"</p> <p>B) "<u>Streetscape improvements must be delivered, prioritising the reduction of severance and improving pedestrian and cycle access. Any proposals affecting the A10 or its frontage must be agreed with Transport for London (TfL), and there must be no direct vehicle access (for parking or servicing) from the A10.</u>"</p> <p>J) "<u>Parking must be minimised across all proposed uses, including residential, commercial, and the re-provision of the retail store, to ensure consistency with the London Plan and support sustainable travel.</u>"</p>

	Section	TfL Reg-18 comment	TfL Reg-19 comment	Enfield Response August 2024	TfL response September-November 2024	Enfield Response 20 December 2024
10.	SA2.4 Southbury Leisure Park	N/A	<p>We support in principle the replacement of the footbridge over Southbury Road with a pedestrian crossing.</p> <p>We welcome the requirement that the development should contribute towards improvements to the facilities at Southbury station.</p> <p>We note the requirement that the development should provide limited parking. This should be amended to say that parking must be minimised and that this applies to all proposed uses including residential, commercial and re-provision of the leisure uses to ensure consistency with the London Plan.</p> <p>We support streetscape improvements but any proposals affecting the A10 or its frontage should be agreed with TfL. There should be no direct vehicle access (to parking or servicing) from the A10.</p>	LBE notes the proposed modifications. If they are further proposed by the Inspector, LBE would be supportive of these modifications being made.	Noted and welcomed.	<p><b>Existing Wording:</b></p> <p>iii) "The development should contribute towards improvements to the facilities at Southbury station."</p> <p>A) "Streetscape improvements should be delivered."</p> <p>K) "The development should provide limited parking."</p> <p><b>Proposed Modification to SA2.4:</b></p> <p>iii) "The development <u>must contribute towards improvements to the facilities at Southbury station to enhance accessibility and connectivity for users.</u>"</p> <p>A) "Streetscape improvements <u>must be delivered, prioritising pedestrian and cycle connectivity, and replacing the existing footbridge over Southbury Road with a pedestrian crossing where feasible. Any proposals affecting the A10 or its frontage must be agreed with Transport for London (TfL), and there must be no direct vehicle access (for parking or servicing) from the A10.</u>"</p> <p>K) "Parking <u>must be minimised across all proposed uses, including residential, commercial, and the re-provision of leisure uses, to ensure consistency with the London Plan and support sustainable transport.</u>"</p>
11.	SA2.5 Tesco Ponders End	N/A	<p>We welcome the requirement that the development should contribute towards improvements to the facilities at Southbury station.</p> <p>We note the requirement that the development should provide limited parking. This should be amended to say that parking must be minimised and that this applies to all proposed uses including residential, commercial and re-provision of the retail store to ensure consistency with the London Plan.</p>	LBE notes the proposed modifications. If they are further proposed by the Inspector, LBE would be supportive of these modifications being made.	Noted and welcomed.	<p><b>Existing Wording:</b></p> <p>ii) "The development should contribute towards improvements to the facilities at Southbury station."</p> <p>I) "The development should provide limited parking."</p> <p><b>Proposed Modification to SA2.5:</b></p> <p>ii) "The development <u>must contribute towards improvements to the facilities at Southbury station, enhancing accessibility and connectivity for users.</u>"</p> <p>I) "Parking <u>must be minimised across all proposed uses, including residential, commercial, and the re-provision of the</u></p>

	Section	TfL Reg-18 comment	TfL Reg-19 comment	Enfield Response August 2024	TfL response September-November 2024	Enfield Response 20 December 2024
						<u>retail store, to ensure consistency with the London Plan and support sustainable transport principles."</u>
12.	SA2.6 Sainsbury's Crown Road	N/A	<p>We welcome the requirement that the development should contribute towards improvements to the facilities at Southbury station.</p> <p>We note the requirement that the development should provide limited parking. This should be amended to say that parking must be minimised and that this applies to all proposed uses including residential, commercial and re-provision of the retail store to ensure consistency with the London Plan.</p> <p>We support streetscape improvements but any proposals affecting the A10 or its frontage should be agreed with TfL. There should be no direct vehicle access (to parking or servicing) from the A10.</p>	LBE notes the proposed modifications. If they are further proposed by the Inspector, LBE would be supportive of these modifications being made.	Noted and welcomed.	<p><b>Existing Wording:</b></p> <p>ii) "The development should contribute towards improvements to the facilities at Southbury station."</p> <p>B) "Streetscape improvements should be delivered."</p> <p>I) "The development should provide limited parking."</p> <p><b>Proposed Modification to SA2.6:</b></p> <p>ii) "The development <u>must contribute towards improvements to the facilities at Southbury station to enhance accessibility and connectivity for users.</u>"</p> <p>B) "Streetscape improvements <u>must be delivered, prioritising enhanced pedestrian and cycle connectivity. Any proposals affecting the A10 or its frontage must be agreed with Transport for London (TfL), and there must be no direct vehicle access (for parking or servicing) from the A10.</u>"</p> <p>I) "Parking <u>must be minimised across all proposed uses, including residential, commercial, and the re-provision of the retail store, to ensure alignment with the London Plan and support sustainable transport.</u>"</p>
13.	SA3.1 Edmonton Green Shopping Centre	Development proposals and changes to traffic circulation must safeguard the continued operation of the bus station with no Loss of efficiency or overall capacity in line with policy T3 of the London Plan and the emerging Transport Land LPG. Given the PTAL of 4- 6a, the amount of car parking should be substantially reduced in line with London Plan policy T6.	<p>We welcome the inclusion of TfL advice regarding continued operation of the bus station. However, the site allocation should make it clearer that the bus station will need to be retained as part of any redevelopment.</p> <p>Additional space is likely to be required within the bus station for charging facilities to allow for the introduction of an all-electric bus fleet. Space may also be required at the shopping centre for Dial a Ride buses to drop off/pick Up passengers and to wait when out of service.</p> <p>We welcome the requirement that the development should contribute towards improvements to the facilities at</p>	Noted	Our previous comments state our position and we do not think they have been adequately addressed.	<p><b>Existing Wording:</b></p> <p>ii) "The development should contribute towards improvements to the facilities at Edmonton Green station, bus facilities, and frequency of buses serving the development site."</p> <p>NB: "Development proposals should safeguard the continued operation of the bus station."</p> <p>L) "The development should deliver car-free development."</p>

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			<p>Edmonton Green station, bus facilities and frequency of buses serving the development site. Any proposals for increased bus frequencies would need to be discussed with TfL to ensure that they are viable in the Long-term. We would need to understand the expected trip generation to establish whether increased frequencies would be economically viable.</p> <p>We welcome the requirement that it must deliver car free development which is consistent with the London Plan taking account of the PTAL of up to 6a. This should apply to all proposed uses including residential and retail.</p>			<p><b>Proposed Modification to SA3.1: Edmonton Green Shopping Centre</b></p> <p>ii) "The development <u>must contribute towards improvements to the facilities at Edmonton Green station, bus infrastructure, and the overall accessibility of the site. Any proposals for increased bus frequencies must be discussed with Transport for London (TfL) to ensure long-term viability based on expected trip generation.</u>"</p> <p>NB: "<u>Development proposals must safeguard the continued operation of the bus station, retaining its efficiency and overall capacity in line with Policy T3 of the London Plan and the emerging Transport Land LPG. The redevelopment must also retain the bus station as part of the scheme and include provision for additional space within the bus station for charging facilities to support an all-electric bus fleet. Space must also be allocated for Dial-a-Ride buses to drop off/pick up passengers and wait while out of service.</u>"</p> <p>L) "The development <u>must deliver car free development for all uses including town centre, commercial and residential to promote active travel. If required, on-street parking is preferred and should be integrated into the public realm, interspersed with tree planting. Any podium parking must not create long stretches of inactive building frontage.</u>"</p> <p>."</p>
14.	SA3.1 Chiswick Road Estate	N/A	<p>We welcome the requirement that the development should contribute towards improvements to the facilities at Edmonton Green station and bus facilities although it is not clear why bus frequency is also mentioned here given the PTAL of 5 and the proposed residential use.</p> <p>It is stated that the development should provide Limited residential parking but due to the PTAL of 5 the site must be a car free development to ensure consistency with the London Plan.</p>	LBE notes the proposed modifications. If they are further proposed by the Inspector, LBE would be supportive of these modifications being made.	Noted and welcomed.	<p><b>Existing Wording:</b></p> <p>ii) "The development should contribute towards improvements to the facilities at Edmonton Green station, bus facilities, and frequency of buses serving the development site."</p> <p>M) "The development should provide limited residential parking."</p> <p><b>Proposed Modification to SAI.3.1:</b></p> <p>ii) "The development <u>must contribute towards improvements to the facilities</u></p>

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						<p><u>at Edmonton Green station and bus infrastructure."</u></p> <p>M) "The development <u>must be a car-free development, reflecting the site's PTAL rating of 5 and ensuring alignment with the London Plan."</u></p>
15.	SA3.3 Fore Street Estate	N/A (Formerly SA URB.24}	It is stated that the development should provide limited residential parking but due to the PTAL of up to 6a the site must be a car free development to ensure consistency with the London Plan.	LBE notes the proposed modifications. If they are further proposed by the Inspector, LBE would be supportive of these modifications being made.	Noted and welcomed.	<p><b>Existing Wording:</b></p> <p>H) "The development should provide limited residential parking."</p> <p><b>Proposed Modification to SAI.3.3:</b></p> <p>H) "The development <u>must prioritise sustainable transport options and must be a car-free development, reflecting the site's PTAL rating of 6a and ensuring alignment with the London Plan while considering the practical needs for accessibility and servicing.."</u></p>
16.	SA4.1 Joyce Avenue and Snell's Park Estate	N/A	<p>We welcome the requirement that the development must contribute towards bus re-routing and future upgrades to bus capacity and should contribute towards access improvements at Silver Street station to create an accessible route to the platform.</p> <p>We support the requirement that the development should minimise parking.</p>	Noted		<p><b>Existing Wording:</b></p> <p>iii) "The development must contribute towards bus re-routing and future upgrades to bus capacity."</p> <p>v) "The development should contribute towards access improvements at Silver Street station to create an accessible route to the platform."</p> <p>L) "The development should minimise parking."</p> <p><b>Proposed Modification to SA4.1:</b></p> <p>iii) "The development <u>must contribute towards bus re-routing and future upgrades to bus capacity, ensuring efficient and sustainable transport connectivity."</u></p> <p>v) "The development <u>must contribute towards access improvements at Silver Street station to create an accessible route to the platform, supporting inclusive transport access."</u></p> <p>L) "Parking <u>must be minimised, reflecting the site's PTAL rating of 5 and ensuring alignment with the London Plan."</u></p>

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17.	SA4.2 Upton Road and Raynham Road	N/A	We welcome the requirement that the development should contribute towards access, facilities and interchange improvements at Silver Street station. We note the requirement that the development should provide limited parking. This should be amended to say that parking must be minimised to ensure consistency with the London Plan.	LBE notes the proposed modifications. If they are further proposed by the Inspector, LBE would be supportive of these modifications being made.	Noted and welcomed.	<p><b>Existing Wording:</b></p> <p>ii) "The development should contribute towards access, facilities and interchange improvements at Silver Street station."</p> <p>L) "The development should provide limited parking."</p> <p><b>Proposed Modification to SA4.2:</b></p> <p>ii) "<u>The development must contribute towards access, facilities, and interchange improvements at Silver Street station to enhance connectivity and inclusivity for all users.</u>"</p> <p>L) "<u>Parking must be minimised across all proposed uses to align with the London Plan and promote sustainable travel.</u>"</p>
18.	SA4.4 SE corner of North Middlesex Hospital	N/A	We welcome the requirement that the development should contribute towards access improvements at Silver Street station.  We note the requirement that the development should provide limited parking. This should be amended to say that parking must be minimised to ensure consistency with the London Plan.	LBE notes the proposed modifications. If they are further proposed by the Inspector, LBE would be supportive of these modifications being made.	Noted and welcomed.	<p><b>Existing Wording:</b></p> <p>ii) "The development should contribute towards access improvements at Silver Street station."</p> <p>L) "The development should provide limited parking."</p> <p><b>Proposed Modification to SA4.4:</b></p> <p>ii) "<u>The development must contribute towards access improvements at Silver Street station to enhance connectivity and accessibility for all users.</u>"</p> <p>L) "<u>Parking must be minimised across all proposed uses to align with the London Plan and support sustainable transport objectives.</u>"</p>
19.	SA4.5 50 - 56 Fore Street	N/A	We welcome the requirement that the development should contribute towards access improvements at Silver Street station to create an accessible route to the platform.  It is stated that the development should provide limited parking but due to the PTAL of 5 the site must be a car free	LBE notes the proposed modifications. If they are further proposed by the Inspector, LBE would be supportive of these modifications being made.	Noted and welcomed.	<p><b>Existing Wording:</b></p> <p>ii) "The development should contribute towards access improvements at Silver Street station to create an accessible route to the platform."</p> <p>l) "The development should provide limited parking."</p> <p><b>Proposed Modification to SA4.5:</b></p>



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			development to ensure consistency with the London Plan.			<p>ii) "The development <u>must contribute towards access improvements at Silver Street station to create an accessible route to the platform, supporting inclusive and sustainable transport.</u>"</p> <p>l) The development <u>must be a car-free development, reflecting the site's PTAL rating of 5 and ensuring alignment with the London Plan while accommodating practical requirements for accessibility and servicing.</u>"</p>
20.	SA5.1 Meridian Water Phase 1	N/A	<p>We welcome the requirement to contribute towards improved bus access, enhanced services from Meridian Water to Edmonton Green and along A1055 corridor. It would be helpful to refer to additional bus stops using similar wording to SA5.2 (phase 2). Any enhanced bus services would need to be economically viable based on expected trip generation. We are currently working on updating options to provide bus services to Meridian Water phases 1 and 2 based on Latest costs.</p> <p>We note the requirement that the development should provide limited parking. This should be amended to say that parking must be minimised to ensure consistency with the London Plan.</p>	Noted	Our previous comments state our position and we do not think they have been adequately addressed.	<p><b>Existing Wording:</b></p> <p>ii) "The development should contribute towards improved bus access, enhanced services from Meridian Water to Edmonton Green and along the A1055 corridor."</p> <p>O) "The development should provide limited parking."</p> <p><b>Proposed Modification to SA5.1:</b></p> <p>ii) "The development <u>must contribute towards improved bus access and enhanced services from Meridian Water to Edmonton Green and along the A1055 corridor. This must include the provision of additional bus stops, similar to the requirements set out in SA5.2 (Phase 2), to ensure adequate bus service coverage. Any enhanced bus services must be economically viable, based on expected trip generation, and agreed in consultation with Transport for London (TfL).</u>"</p> <p>O) "Parking <u>must be minimised across all proposed uses to ensure consistency with the London Plan and promote sustainable travel options.</u>"</p>
21.	SA5.1 Meridian Water Phase 2	N/A	<p>We welcome the requirement to contribute towards improved bus access, such as additional bus stops and enhanced services along A1055 corridor. Any enhanced bus services would need to be economically viable based on expected trip generation. We are currently working on updating options to provide bus services to Meridian Water phases 1 and 2 based on latest costs.</p>	LBE notes the proposed modifications. If they are further proposed by the Inspector, LBE would be supportive of these modifications being made.	Noted and welcomed.	<p><b>Existing Wording:</b></p> <p>i) "The development should contribute towards improved bus access, such as additional bus stops and enhanced services along the A1055 corridor."</p> <p>P) "The development should provide limited residential parking."</p>

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			We note the requirement that the development should provide limited residential parking. This should be amended to say that parking must be minimised including for commercial uses to ensure consistency with the London Plan.			<p><b>Proposed Modification to SA5.2:</b></p> <p>i) "The development <u>must contribute towards improved bus access, including the provision of additional bus stops and enhanced services along the A1055 corridor. Any enhanced bus services must be economically viable, based on expected trip generation, and agreed in consultation with Transport for London (TfL).</u>"</p> <p>P) "Parking <u>must be minimised across all proposed uses, including residential and commercial, to ensure consistency with the London Plan and promote sustainable transport.</u>"</p>
22.	SA5.3 Former Ikea Meridian Water	N/A	<p>We welcome the requirement to deliver public transport improvements. However, this should be more specific by setting out what form the improvements should take eg bus service capacity to meet demand and the retention and enhancement of bus standing facilities. Any enhanced bus services would need to be economically viable based on expected trip generation. We are currently working on updating options to provide bus services to Meridian Water phases   and 2 based on Latest costs.</p> <p>The Design Principles should include a requirement that the development must minimise parking for residential and commercial uses to ensure consistency with the London Plan.</p>	Noted	Our previous comments state our position and we do not think they have been adequately addressed.	<p><b>Existing Wording:</b></p> <p>i) "The development should deliver public transport improvements."</p> <p><b>Proposed Modification to SA5.3:</b></p> <p>i) "The development <u>must deliver public transport improvements, including enhanced bus service capacity to meet demand and the retention and enhancement of bus standing facilities. Any enhanced bus services must be economically viable, based on expected trip generation, and agreed in consultation with Transport for London (TfL).</u>"</p> <p>Add to Design Principles:</p> <p>H) "The development <u>must minimise parking for residential and commercial uses to ensure consistency with the London Plan and support sustainable transport objectives.</u>"</p>
23.	SA5.4 Tesco Extra Meridian Water	N/A	<p>We welcome the requirement that the development should provide improved bus access/stops but it is not clear what is meant by diversions. Any enhanced bus services would need to be economically viable based on expected trip generation.</p> <p>The Design Principles should include a requirement that the development should minimise parking for residential and commercial uses including any re-</p>	Noted	Our previous comments state our position and we do not think they have been adequately addressed.	<p><b>Existing Wording:</b></p> <p>i) "The development should provide improved bus access/stops and diversions."</p> <p><b>Proposed Modification to SA5.4:</b></p> <p>i) "The development <u>must provide improved bus access, including new or enhanced bus stops, to ensure efficient connectivity. The reference to</u></p>

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			provided retail store to ensure consistency with the London Plan.			<p><u>'diversions' should be clarified or removed if not applicable. Any enhanced bus services must be economically viable, based on expected trip generation, and agreed in consultation with Transport for London (TfL).'</u></p> <p>Add to Design Principles:</p> <p><u>H) "The development must minimise parking for residential and commercial uses, including any re-provided retail store, to ensure consistency with the London Plan and support sustainable transport objectives."</u></p>
24.	SA5.5 Meridian 13		The Design Principles should include a requirement that the development should minimise parking for residential and commercial uses to ensure consistency with the London Plan.	Noted		<p><b>Existing Wording:</b></p> <p>No specific mention of parking minimisation in the Design Principles.</p> <p><b>Proposed Modification to SA5.5:</b></p> <p>Add to Design Principles:</p> <p><u>H) "The development must minimise parking for residential and commercial uses to ensure consistency with the London Plan and support sustainable transport objectives."</u></p>
25.	SA5.6 Meridian East (Harbet Road}	N/A	<p>We welcome the requirement that the development should ensure reprovision of the existing Arriva bus garage in line with London Plan Policy T3, unless suitable alternative provision has been delivered elsewhere. Due to the importance of the bus garage in supporting the Local bus network the wording should be amended to state that the development 'must ensure reprovision...' Any reprovision should consider the transition to an all- electric bus fleet and the additional space for charging facilities. This point should be reinforced by including the re-provided bus garage in the Land Use Requirements.</p> <p>The Infrastructure Requirements should be explicit in requiring contributions towards public transport which could include bus service improvements and/or bus stops/stands to improve connectivity. Any enhanced bus</p>	LBE notes the proposed modifications. If they are further proposed by the Inspector, LBE would be supportive of these modifications being made.	Noted and welcomed.	<p><b>Existing Wording:</b></p> <p>ii) "The development should ensure reprovision of the existing Arriva bus garage in line with London Plan Policy T3, unless suitable alternative provision has been delivered elsewhere."</p> <p>No explicit mention of contributions towards public transport improvements in Infrastructure Requirements.</p> <p>No specific mention of parking minimisation in Design Principles.</p> <p><b>Proposed Modification to SA5.6:</b></p> <p>ii) <u>"The development must ensure reprovision of the existing Arriva bus garage in line with London Plan Policy T3, unless suitable alternative provision has been delivered elsewhere. The re-provided bus garage must support the transition to an all-electric bus fleet,</u></p>

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			<p>services would need to be economically viable based on expected trip generation. We are working on updating options to provide bus services to Meridian Water phases   and 2 based on Latest costs.</p> <p>The Design Principles should state a requirement that the development must minimise parking for residential and commercial uses to ensure consistency with the London Plan.</p>			<p><u>including additional space for charging facilities."</u></p> <p>vi) <u>"The development must contribute to public transport infrastructure, which could include bus service improvements, new or improved bus stops/stands, or other measures to enhance connectivity. Any enhanced bus services must be economically viable, based on expected trip generation, and agreed in consultation with Transport for London (TfL)."</u></p> <p>F) <u>"The development must minimise parking for residential and commercial uses to ensure consistency with the London Plan and to support sustainable transport objectives."</u></p>
26.	SA6. 1 Southgate Office Village	N/A	<p>We welcome the requirement that it must deliver a car free development. We recommend that the wording is amended to clarify that the existing car park should not be re-provided.</p>	<p>LBE notes the proposed modifications. If they are further proposed by the Inspector, LBE would be supportive of these modifications being made.</p>	<p>Noted and welcomed.</p>	<p><b>Existing Wording:</b></p> <p>K. should provide limited parking to promote active travel. If required, on-street parking is preferred and should be integrated into the public realm, interspersed with tree planting.</p> <p><b>Proposed Modification to SA6.1</b></p> <p>K <u>"The development must deliver a car-free development, ensuring alignment with the London Plan and supporting sustainable transport objectives."</u></p>
27.	SA6.3 Minchenden Car Park & Alan Pullinger Centre		<p>We welcome the requirement that it must deliver a car free development. We recommend that the wording is amended to clarify that the existing car park should not be re-provided.</p>		<p>TfL requested the following amendment:</p> <p>Amend design principle J to state: 'must deliver car free development to promote active travel. <u>The existing car park should not be reprovided.'</u></p>	<p><b>Proposed Modification to SA6.3</b></p> <p>J <u>"The development must deliver a car-free development, ensuring alignment with the London Plan and supporting sustainable transport objectives. The existing car park should not be reprovided "</u></p>
28.	SA7.1 Former Gasholder New Southgate	N/A	<p>We welcome the requirement to contribute towards identified TfL upgrades to London Underground network serving Arnos Grove. This would include funding towards station access improvements including installation of Lifts which could contribute towards the long-term aim of providing step free access and streetscape improvements to enhance</p>	<p>LBE notes the proposed modifications. If they are further proposed by the Inspector, LBE would be supportive of these modifications being made. In regard to a rapid transit route Enfield confirms it has not included proposal within the Placemaking and/or IDP documents and the Council will not pursue this solution at present.</p>	<p>Noted and welcomed.</p>	<p><b>Existing Wording:</b></p> <p>i) "Contributions are required towards a rapid transit route."</p> <p>ii) "The development should contribute towards identified TfL upgrades to the London Underground network serving Arnos Grove."</p>

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			<p>accessibility and safety for station users.</p> <p>We note the reference to contributions required towards a rapid transit route. As previously stated on proposals for an East West Transit, TfL has no funding to support a rapid transit route and this is not currently committed. The recent introduction of route SLI provides a limited stop express bus service between North Finchley and Walthamstow Central with stops close to New Southgate station. Contributions intended for a rapid transit route would be better directed towards measures to support route SLI including enhanced bus priority and improved bus infrastructure and we recommend that the wording is changed to reflect this.</p> <p>We note the requirement that the development should provide limited parking. This should be amended to say that parking must be minimised to ensure consistency with the London Plan.</p> <p>We support streetscape improvements but any proposals affecting the North Circular Road or its frontage should be agreed with TfL. There should be no direct vehicle access (to parking or servicing) from the North Circular Road.</p>			<p>B) "Streetscape improvements should be delivered."</p> <p>L) "The development should provide limited parking."</p> <p><b>Proposed Modification to SA7.1:</b></p> <p>i) "Contributions <u>must be directed towards measures to support the SLI express bus route, including enhanced bus priority and improved bus infrastructure</u>"</p> <p>ii) "The development <u>must contribute towards identified TfL upgrades to the London Underground network serving Arnos Grove. This includes funding towards station access improvements, such as the installation of lifts to support step-free access, and streetscape improvements to enhance accessibility and safety for station users.</u>"</p> <p>"Streetscape improvements <u>must be delivered, and any proposals affecting the North Circular Road or its frontage must be agreed with Transport for London (TfL). There must be no direct vehicle access (for parking or servicing) from the North Circular Road.</u>"</p> <p>"Parking must be minimised to ensure <u>consistency with the London Plan and promote sustainable travel.</u>"</p>
29.	SA7.2 Aldi New Southgate	N/A	<p>We welcome the requirement to contribute towards identified TfL upgrades to London Underground network serving Arnos Grove. This would include funding towards station access improvements including installation of Lifts which could contribute towards the long-term aim of providing step free access and streetscape improvements to enhance accessibility and safety for station users.</p> <p>We note the reference to contributions required towards a rapid transit route. As previously stated on proposals for an East West Transit, TfL has no funding to support a rapid transit route and this is not currently committed. The recent introduction of route SLI provides</p>	<p>LBE notes the proposed modifications. If they are further proposed by the Inspector, LBE would be supportive of these modifications being made.</p> <p>In regard to a rapid transit route Enfield confirms it has not included proposal within the Placemaking and/or IDP documents and the Council will not pursue this solution at present.</p>	Noted and welcomed.	<p><b>Existing Wording:</b></p> <p>i) and "Contributions are required towards a rapid transit route."</p> <p>ii) "The development should contribute towards identified TfL upgrades to the London Underground network serving Arnos Grove."</p> <p>A) "Streetscape improvements should be delivered."</p> <p>J) "The development should provide limited parking."</p> <p><b>Proposed Modification to SA7.2:</b></p> <p>i) "Contributions <u>must be directed towards measures supporting the SLI express bus route, including enhanced</u></p>

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			<p>a limited stop express bus service between North Finchley and Walthamstow Central with stops close to New Southgate station. Contributions intended for a rapid transit route would be better directed towards measures to support route SLI including enhanced bus priority and improved bus infrastructure and we recommend that the wording is changed to reflect this.</p> <p>We note the requirement that the development should provide limited parking. This should be amended to say that parking must be minimised for residential and non-residential uses including any re-provided retail uses to ensure consistency with the London Plan.</p> <p>We support streetscape improvements but any proposals affecting the North Circular Road or its frontage should be agreed with TfL. There should be no direct vehicle access (to parking or servicing) from the North Circular Road.</p>			<p><u>bus priority and improved bus infrastructure.</u> "</p> <p>i) "The development <u>must</u> contribute towards identified TfL upgrades to the London Underground network serving Arnos Grove. <u>This includes funding for station access improvements, such as the installation of lifts, to support the long-term aim of step-free access and streetscape improvements to enhance accessibility and safety for station users.</u>"</p> <p>A) "Streetscape improvements <u>must</u> be delivered, and any proposals affecting the North Circular Road or its frontage <u>must be agreed with Transport for London (TfL). There must be no direct vehicle access (for parking or servicing) from the North Circular Road.</u>"</p> <p>J) "<u>Parking must be minimised for all residential and non-residential uses, including any re-provided retail uses, to ensure consistency with the London Plan and support sustainable transport objectives.</u>"</p>
30.	SA7.3 New Ladders-wood Estate	N/A	<p>We welcome the requirement to contribute towards identified TfL upgrades to London Underground network serving Arnos Grove. This could include funding towards station access improvements including installation of lifts which could contribute towards the long-term aim of providing step free access and streetscape improvements to enhance accessibility and safety for station users.</p> <p>It is stated that limited parking is required but due to the PTAL of 5 the site must be a car free development to ensure consistency with the London Plan. The Council must clarify that any parking provided must be Limited to returning residents with an existing car in an estate regeneration scheme.</p>	LBE notes the proposed modifications. If they are further proposed by the Inspector, LBE would be supportive of these modifications being made.	Noted and welcomed.	<p><b>Existing Wording:</b></p> <p>ii) "The development should contribute towards identified TfL upgrades to the London Underground network serving Arnos Grove."</p> <p>J) "The development should provide limited parking."</p> <p><b>Proposed Modification to SA7.3:</b></p> <p>ii) "The development <u>must</u> contribute towards identified TfL upgrades to the London Underground network serving Arnos Grove. <u>This includes funding for station access improvements, such as the installation of lifts, to support the long-term aim of step-free access and streetscape improvements to enhance accessibility and safety for station users.</u>"</p> <p>J) "The development <u>must prioritise sustainable transport options, must be car free reflecting the site's PTAL of 5 and 6 ensuring alignment with the London Plan and sustainable transport</u></p>

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						<u>objectives, while accommodating practical requirements for accessibility, servicing, and drop-off needs. Any parking provided must be strictly limited to returning residents with an existing car as part of the estate regeneration scheme."</u>
31.	SA7.4 Arnos Grove station car park	N/A	<p>We welcome the requirement to contribute towards identified TfL upgrades to London Underground network serving Arnos Grove. This could include funding towards station access improvements including installation of Lifts which could contribute towards the long-term aim of providing step free access and streetscape improvements to enhance accessibility and safety for station users.</p> <p>It is stated that limited parking is required but due to the PTAL of 6a the site must be a car free development to ensure consistency with the London Plan.</p>	LBE notes the proposed modifications. If they are further proposed by the Inspector, LBE would be supportive of these modifications being made.	Noted and welcomed.	<p><b>Existing Wording:</b></p> <p>ii) "The development should contribute towards identified TfL upgrades to the London Underground network serving Arnos Grove."</p> <p>k) "The development should provide limited parking."</p> <p><b>Proposed Modification to SA7.4:</b></p> <p>ii) "The development <u>must</u> contribute towards identified TfL upgrades to the London Underground network serving Arnos Grove. <u>This includes funding for station access improvements, such as the installation of lifts, to support the long-term aim of step-free access and streetscape improvements to enhance accessibility and safety for station users.</u>"</p> <p>K) "The development <u>must</u> prioritise sustainable transport options and <u>must</u> be car free reflecting the site's PTAL of 6a, ensuring alignment with the London Plan and sustainable transport objectives, while accommodating practical requirements for accessibility, servicing, and drop-off needs."</p>
32.	SA7.5 Coppice Wood Lodge, 10 Grove Road, Southgate	N/A	<p>We note the reference to contributions required towards a rapid transit route. As previously stated on proposals for an East West Transit, TfL has no funding to support a rapid transit route and this is not currently committed. The recent introduction of route SLI provides a Limited stop express bus service between North Finchley and Walthamstow Central with stops close to New Southgate station. Contributions intended for a rapid transit route would be better directed towards measures to support route SLI including enhanced bus priority and improved bus</p>	LBE notes the proposed modifications. If they are further proposed by the Inspector, LBE would be supportive of these modifications being made. In regard to a rapid transit route Enfield confirms it has not included proposal within the Placemaking and/or IDP documents and the Council will not pursue this solution at present.	Noted and welcomed.	<p><b>Existing Wording:</b></p> <p>I.) should contribute towards delivery of streetscape improvements and improved highways in the vicinity to encourage sustainable travel, potentially including but not limited to cycle lanes, footpath widening and a rapid transit route as identified in the placemaking policy or IDP.</p> <p>J) "The development should provide limited parking."</p> <p><b>Proposed Modification to SA7.5:</b></p>

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			<p>infrastructure and we recommend that the wording is changed to reflect this.</p> <p>It is stated that limited parking is required but due to the PTAL of 5/6a the site must be a car free development to ensure consistency with the London Plan.</p>			<p>I.) should contribute towards delivery of streetscape improvements and improved highways in the vicinity to encourage sustainable travel, potentially including but not limited to cycle lanes, <u>and</u> footpath widening <del>and a rapid transit route</del> as identified in the placemaking policy or IDP.</p> <p>ii) "<u>Contributions must be directed towards measures to support the SLI express bus route, including enhanced bus priority and improved bus infrastructure.</u>"</p> <p>iii) <del>H.</del> should contribute towards delivery of public realm, new and enhanced public spaces and gateway improvements to key areas within the vicinity as identified in the placemaking policy or IDP.</p> <p>J) "<u>The development must prioritise sustainable transport options and must be car free, reflecting the site's PTAL of 5/6a and ensuring alignment with the London Plan and sustainable transport objectives, while accommodating practical requirements for accessibility, servicing, and drop-off needs.</u>"</p>
33.	SA8.1 Morrisons, Palmers Green	N/A	<p>We note the reference to contributions required towards a rapid transit route. As previously stated on proposals for an East West Transit, TfL has no funding to support a rapid transit route and this is not currently committed. The recent introduction of route SLI provides a limited stop express bus service between North Finchley and Walthamstow Central with stops close to New Southgate station. Contributions intended for a rapid transit route would be better directed towards measures to support route SLI including enhanced bus priority and improved bus infrastructure and we recommend that the wording is changed to reflect this.</p> <p>We welcome the requirement that the development should adopt a car free approach for residential uses, Car parking for any commercial uses including the re-provided retail store must be minimised and in line with</p>	<p>LBE notes the proposed modifications. If they are further proposed by the Inspector, LBE would be supportive of these modifications being made.</p> <p>In regard to a rapid transit route Enfield confirms it has not included proposal within the Placemaking and/or IDP documents and the Council will not pursue this solution at present.</p>	Noted and welcomed.	<p><b>Existing Wording:</b></p> <p>I) must contribute towards delivery of streetscape improvements and improved highways along Broomfield Lane, Aldermans Hill towards Palmers Green station and town centre and in the vicinity to encourage sustainable travel, potentially including but not limited to cycle lanes, footpath widening and a rapid transit route as identified in the placemaking policy or IDP.</p> <p><b>Proposed Modification to SA8.1:</b></p> <p>I) must contribute towards delivery of streetscape improvements and improved highways along Broomfield Lane, Aldermans Hill towards Palmers Green station and town centre and in the vicinity to encourage sustainable travel, potentially including but not limited to cycle lanes, <u>and</u> footpath widening <del>and a rapid transit route</del> as identified in the placemaking policy or</p>



	Section	TfL Reg-18 comment	TfL Reg-19 comment	Enfield Response August 2024	TfL response September-November 2024	Enfield Response 20 December 2024
			London Plan maximum standards for a site with a PTAL of 3.			IDP. <u>"Contributions must be directed towards measures to support the SLI express bus route, including enhanced bus priority and improved bus infrastructure."</u>
34.	SA8.2 Lodge Drive Car Park, Palmers Green	N/A	<p>We note the reference to contributions required towards a rapid transit route. As previously stated on proposals for an East West Transit, TfL has no funding to support a rapid transit route and this is not currently committed. The recent introduction of route SLI provides a Limited stop express bus service between North Finchley and Walthamstow Central with stops close to New Southgate station. Contributions intended for a rapid transit route would be better directed towards measures to support route SLI including enhanced bus priority and improved bus infrastructure and we recommend that the wording is changed to reflect this.</p> <p>We note the requirement that the development should provide limited residential parking. This should be amended to say that parking must be minimised. We recommend that the wording is amended to clarify that the existing car park should not be re-provided.</p>	<p>LBE notes the proposed modifications. If they are further proposed by the Inspector, LBE would be supportive of these modifications being made.</p> <p>In regard to a rapid transit route Enfield confirms it has not included proposal within the Placemaking and/or IDP documents and the Council will not pursue this solution at present.</p>	Noted and welcomed.	<p><b>Existing Wording:</b></p> <p>i) "Contributions are required towards a rapid transit route."</p> <p>J) "The development should provide limited residential parking."</p> <p><b>Proposed Modification to SA8.2:</b></p> <p>I. must contribute towards delivery of streetscape improvements and improved highways along Broomfield Lane, Aldermans Hill towards Palmers Green station and town centre and in the vicinity to encourage sustainable travel, potentially including but not limited to cycle lanes, <u>and footpath widening and a rapid transit route as identified in the placemaking policy or IDP. Contributions must be directed towards measures to support the SLI express bus route, including enhanced bus priority and improved bus infrastructure."</u></p> <p>J) "The development <u>must minimise residential parking to ensure consistency with the London Plan and support sustainable transport objectives..</u>"</p>
35.	SA8.3 Corner of Green Lanes and the North Circular	N/A	<p>We note the requirement that the development should provide limited parking. This should be amended to say that parking must be minimised including commercial uses.</p> <p>We support streetscape improvements but any proposals affecting the North Circular Road or its frontage should be agreed with TfL. There should be no direct vehicle access (to parking or servicing) from the North Circular Road.</p>	<p>LBE notes the proposed modifications. If they are further proposed by the Inspector, LBE would be supportive of these modifications being made.</p>	Noted and welcomed.	<p><b>Existing Wording:</b></p> <p>i) "Streetscape improvements should be delivered."</p> <p>L) "The development should provide limited parking."</p> <p><b>Proposed Modification to SA8.3:</b></p> <p>i) "Streetscape improvements <u>must be delivered to enhance pedestrian and cycle accessibility. Any proposals affecting the North Circular Road or its frontage must be agreed with Transport for London (TfL), and there must be no direct vehicle access (for parking or</u></p>

	Section	TfL Reg-18 comment	TfL Reg-19 comment	Enfield Response August 2024	TfL response September-November 2024	Enfield Response 20 December 2024
						servicing) from the North Circular Road."  J) "Parking must be minimised for all uses, including commercial uses, to ensure consistency with the London Plan and to promote sustainable transport objectives."
36.	SA8.4 Travis Perkins, Palmers Green	N/A	We welcome the requirement that it must provide car free residential development. Car parking for any commercial uses including the re-provided Travis Perkins must be minimised in line with London Plan maximum standards for a site with a PTAL of 3.	Noted	Our previous comments state our position and we do not think they have been adequately addressed.	<b>Existing Wording:</b> M) "The development must provide car-free residential development."  "Limited parking should be provided for commercial uses."  <b>Proposed Modification to SA8.4:</b>  M) <del>M. must provide car free residential development to promote active travel.</del> "The development must provide car-free residential development, reflecting sustainable transport objectives and the site's PTAL rating of 3. Parking for any commercial uses, including the re-provided Travis Perkins, must be minimised and adhere to the London Plan maximum standards. If required, on-street parking is preferred and should be integrated into the public realm, with long runs broken down with tree planting Any podium/undercroft parking must not create long stretches of inactive building frontage."
37.	SA10.1 Land at Chase Park South	N/A	<p>The design principles should state that any car parking must be minimised and be consistent with the ambition of achieving 75 per cent sustainable transport mode share. This will require car parking substantially lower than London Plan maximum standards and should consider future rather than existing PTAL.</p> <p>The infrastructure requirements should also make explicit the need for substantial contributions towards public transport to improve connectivity to a level comparable with urban placemaking areas in the borough.</p> <p>A costed and agreed Infrastructure Delivery Plan should be submitted to outline the full package of transport</p>	In terms of transport infrastructure, LBE's position is clear that making the provision of, or enhancements to, public transport infrastructure will start to be delivered from the 1st phase of the development. This has been costed and will be phased through the emerging IDP. The delivery of public transport infrastructure from an early phase will help reduce car trips and encourage a modal shift away from the use of the car. It will also enable future improvements to public transport infrastructure. The emerging delivery strategies will detail the type of public transport provision to be provided for the sites. The result will be that the developments become more sustainable places as they're built out.	Our previous comments state our position and we do not think they have been adequately addressed.  The costs for public transport infrastructure have not been shared or agreed with TfL and are not included in the emerging IDP. The emerging delivery strategies which will detail the type of public transport provision have not been shared or agreed with TfL.  Also, refer to comments for Spatial Strategy SS1 and PL9 - 11 and Chase Park in Appendix 1	The Council acknowledges and appreciates the extensive issues raised by TfL regarding public transport connectivity, density, car parking standards, and sustainable development within the proposed Chase Park placemaking area. We value the collaborative efforts with TfL and remain committed to addressing these challenges while advancing the Local Plan's objectives.  <b>Public Transport Connectivity and Accessibility Challenges:</b> The Council recognises the low Public Transport Accessibility Level (PTAL) across much of Chase Park and is committed to improving this through phased, cost-effective solutions developed in collaboration with TfL,

	Section	TfL Reg-18 comment	TfL Reg-19 comment	Enfield Response August 2024	TfL response September-November 2024	Enfield Response 20 December 2024
			<p>infrastructure for all Chase Park sites. TfL is concerned that by breaking up the Chase Park placemaking area into four separate site allocations, parts of the placemaking area could come forward in advance of agreement on the infrastructure requirements (and costs) that will be needed for the area as a whole.</p>			<p>developers, and other stakeholders. While achieving urban-level PTAL ratings across the area is complex, Enfield's strategy prioritises incremental improvements to maximise accessibility through strategic transport planning and investment.</p> <p><b>Phased Approach to Public Transport Solutions:</b> Enfield has already engaged with TfL bus officers and remains committed to further collaboration during the masterplanning process to identify and implement potential solutions. The updated Infrastructure Delivery Plan (IDP), published on 30 September 2024, outlines initial infrastructure requirements and demonstrates the Council's dedication to delivering long-term public transport enhancements.</p> <p><b>Car Parking Standards and Sustainable Transport Mode Share Targets:</b> The Council is aligned with TfL on the importance of minimising car parking. Enfield's car parking strategy, informed by London Plan Policy T6, will promote restraint, car club use, and active travel alternatives. The design principles for SA10.1 will reflect this strategy, and the Council will work towards reducing car dependency while supporting a 75% sustainable mode share target.</p> <p><b>Indicative Costs, Timescales, and Funding:</b> Enfield acknowledges the importance of detailed costing and delivery timelines for public transport services and infrastructure. The IDP forms the basis of this work and will continue to evolve in coordination with TfL. Mechanisms such as Section 106 agreements and the Community Infrastructure Levy (CIL) will be aligned with identified infrastructure needs.</p> <p><b>Masterplanning Commitment:</b> Enfield is committed to preparing a comprehensive masterplan for Chase Park to provide detailed guidance on transport infrastructure, densities, and car parking standards. This masterplan will ensure cohesive development across the placemaking area and will</p>

	Section	TfL Reg-18 comment	TfL Reg-19 comment	Enfield Response August 2024	TfL response September-November 2024	Enfield Response 20 December 2024
						<p>be developed in collaboration with TfL to address outstanding issues.</p> <p><b>Coordination and Duty to Cooperate:</b> The Council recognises the importance of ongoing collaboration and will ensure that future iterations of the IDP and masterplan are fully coordinated with TfL and other stakeholders. This approach will align with transport priorities and infrastructure needs, meeting our Duty to Cooperate obligations.</p> <p>Enfield shares TfL's commitment to Good Growth principles and is determined to ensure that development within Chase Park meets sustainability, accessibility, and connectivity goals. We look forward to continued collaboration to address these challenges and to deliver a well-integrated, sustainable placemaking area that benefits both current and future residents.</p> <p>No modifications are made to this site allocation.</p>
38.	SA10.2 Arnold House and land to the rear	N/A	<p>We note the requirement to provide limited residential parking. This should be amended to say that parking must be minimised and be consistent with the ambition of achieving 75 per cent sustainable mode share.</p> <p>A costed and agreed Infrastructure Delivery Plan should be submitted to outline the full package of transport infrastructure for all Chase Park sites. TfL is concerned that by breaking up the Chase Park placemaking area into four separate site allocations, parts of the placemaking area could come forward in advance of agreement on the infrastructure requirements (and costs) that will be needed for the area as a whole.</p>	<p>In terms of transport infrastructure, LBE's position is clear that making the provision of, or enhancements to, public transport infrastructure will start to be delivered from the 1st phase of the development. This has been costed and will be phased through the emerging IDP. The delivery of public transport infrastructure from an early phase will help reduce car trips and encourage a modal shift away from the use of the car. It will also enable future improvements to public transport infrastructure. The emerging delivery strategies will detail the type of public transport provision to be provided for the sites. The result will be that the developments become more sustainable places as they're built out.</p>	<p>Our previous comments state our position and we do not think they have been adequately addressed. The costs for public transport infrastructure have not been shared or agreed with TfL and are not included in the emerging IDP. The emerging delivery strategies which will detail the type of public transport provision have not been shared or agreed with TfL.</p>	<p>Enfield Borough Council acknowledges and appreciates TfL's comments on SA10.2 and their broader concerns regarding the transport infrastructure needs of the Chase Park placemaking area. Below is our response addressing these issues in a proportionate manner for this site allocation.</p> <p><b>Transport Infrastructure and IDP Coordination</b></p> <p>Enfield is committed to delivering a cohesive and well-integrated approach to transport infrastructure across the Chase Park area. The emerging Infrastructure Delivery Plan (IDP) includes costed and phased public transport enhancements, starting from the first phase of development. While specific costings and detailed delivery strategies for individual sites are still under development, these will be shared with TfL as part of ongoing collaborative discussions.</p>

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						<p>The Council recognises the importance of ensuring that no part of the Chase Park area comes forward prematurely without an agreed approach to infrastructure requirements. SA10.2 will align with the broader placemaking strategy and contribute proportionately to delivering the necessary transport infrastructure to achieve long-term sustainability goals.</p> <p><b>Parking Standards</b></p> <p>The Council agrees that minimising parking is critical for achieving the ambitious 75% sustainable mode share target.</p> <p>Existing wording: J) "The development should provide limited residential parking."</p> <p><b>Proposed Modification SA10.2 part J:</b>  <u>"The development must minimise residential parking to align with the ambition of achieving a 75% sustainable mode share and support active and sustainable travel options."</u></p> <p><b>Commitment to Sustainable Development</b></p> <p>SA10.2 will contribute to sustainable transport objectives through reduced car dependency, alignment with the London Plan, and enhancements to public transport infrastructure. The phased delivery of transport improvements, as outlined in the IDP, will ensure that developments in Chase Park support sustainable growth and meet the needs of both current and future residents.</p> <p>Enfield values TfL's partnership and will continue working closely to refine and align transport delivery strategies with TfL's priorities. Further details on costs and infrastructure plans for SA10.2 and the broader Chase Park area will be shared as the IDP evolves.</p>
39.	SA10.3 Chase Park North East	N/A	The design principles should state that any car parking must be minimised and be consistent with the ambition of	In terms of transport infrastructure, LBE's position is clear that making the provision of, or enhancements to, public	Our previous comments state our position and we do not think they have been adequately addressed.	See our response to SA10.1.

	Section	TfL Reg-18 comment	TfL Reg-19 comment	Enfield Response August 2024	TfL response September-November 2024	Enfield Response 20 December 2024
			<p>achieving 75 per cent sustainable transport mode share. This will require car parking substantially lower than London Plan maximum standards and should consider future rather than existing PTAL.</p> <p>The infrastructure requirements should also make explicit the need for substantial contributions towards public transport to improve connectivity to a level comparable with urban placemaking areas in the borough.</p> <p>A costed and agreed Infrastructure Delivery Plan should be submitted to outline the full package of transport infrastructure for all Chase Park sites. TfL is concerned that by breaking up the Chase Park placemaking area into four separate site allocations, parts of the placemaking area could come forward in advance of agreement on the infrastructure requirements (and costs) that will be needed for the area as a whole.</p>	<p>transport infrastructure will start to be delivered from the 1st phase of the development. This has been costed and will be phased through the emerging IDP. The delivery of public transport infrastructure from an early phase will help reduce car trips and encourage a model shift away from the use of the car. It will also enable future improvements to public transport infrastructure. The emerging delivery strategies will detail the type of public transport provision to be provided for the sites. The result will be that the developments become more sustainable places as they're built out.</p>	<p>The costs for public transport infrastructure have not been shared or agreed with TfL and are not included in the emerging IDP. The emerging delivery strategies which will detail the type of public transport provision have not been shared or agreed with TfL.</p> <p>Also, refer to comments for Spatial Strategy SS1 and PL9 - 11 and Chase Park in Appendix 1</p>	
40.	SA10.4 Chase Park North West	N/A	<p>The design principles should state that any car parking must be minimised and be consistent with the ambition of achieving 75 per cent sustainable transport mode share. This will require car parking substantially lower than London Plan maximum standards and should consider future rather than existing PTAL.</p> <p>Although there is reference to the creation of a primary street suitable for use by buses in the design principles, the infrastructure requirements should also make explicit the need for substantial contributions towards public transport to improve connectivity to a level comparable with urban placemaking areas in the borough.</p> <p>A costed and agreed Infrastructure Delivery Plan should be submitted to outline the full package of transport infrastructure for all Chase Park sites. TfL is concerned that by breaking up the Chase Park placemaking area into four separate site allocations, parts of the placemaking area could come forward in advance of agreement on the</p>	<p>In terms of transport infrastructure, LBE's position is clear that making the provision of, or enhancements to, public transport infrastructure will start to be delivered from the 1st phase of the development. This has been costed and will be phased through the emerging IDP. The delivery of public transport infrastructure from an early phase will help reduce car trips and encourage a model shift away from the use of the car. It will also enable future improvements to public transport infrastructure. The emerging delivery strategies will detail the type of public transport provision to be provided for the sites. The result will be that the developments become more sustainable places as they're built out.</p>	<p>Our previous comments state our position and we do not think they have been adequately addressed.</p> <p>The costs for public transport infrastructure have not been shared or agreed with TfL and are not included in the emerging IDP. The emerging delivery strategies which will detail the type of public transport provision have not been shared or agreed with TfL.</p> <p>Also, refer to comments for Spatial Strategy SS1 and PL9 - 11 and Chase Park in Appendix 1</p>	See our response to SA10.1.

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			infrastructure requirements (and costs) that will be needed for the area as a whole.			
41.	SA11.1 Land north of Cattlegate Road, Crews Hill	N/A	<p>The design principles should state that any car parking must be minimised and be consistent with the ambition of achieving 75 per cent sustainable transport mode share. This will require car parking substantially lower than London Plan maximum standards and should consider future rather than existing PTAL.</p> <p>Although there are some references to public transport infrastructure in the design principles and a requirement for a public transport bridge over the railway, the infrastructure requirements should also make explicit the need for substantial contributions towards public transport to improve connectivity to a Level comparable with urban placemaking areas in the borough.</p> <p>We note that development of the site should locate development in areas within 400 metres of a bus stop. This wording is different from SA11.3 which states that development of the site should limit development to areas within 400 metres of a bus stop. The wording should be changed to match SA11.3.</p> <p>A costed and agreed Infrastructure Delivery Plan should be submitted to outline the full package of transport infrastructure for all Crews Hill sites. TfL is concerned that by breaking up the Crews Hill placemaking area into six separate site allocations, parts of the placemaking area could come forward in advance of agreement on the infrastructure requirements (and costs) that will be needed for the area as a whole.</p>	<p>In terms of transport infrastructure, LBE's position is clear that making the provision of, or enhancements to, public transport infrastructure will start to be delivered from the 1st phase of the development. This has been costed and will be phased through the emerging IDP. The delivery of public transport infrastructure from an early phase will help reduce car trips and encourage a model shift away from the use of the car. It will also enable future improvements to public transport infrastructure. The emerging delivery strategies will detail the type of public transport provision to be provided for the sites. The result will be that the developments become more sustainable places as they're built out.</p>	<p>Our previous comments state our position and we do not think they have been adequately addressed.</p> <p>The costs for public transport infrastructure have not been shared or agreed with TfL and are not included in the emerging IDP. The emerging delivery strategies which will detail the type of public transport provision have not been shared or agreed with TfL.</p> <p>Also, refer to comments for Spatial Strategy SS1 and PL9 - 11 and Crews Hill in Appendix 1</p>	<p><b>Public Transport and Connectivity Challenges</b></p> <p>The Council acknowledges the current challenges of providing high-quality public transport services to Crews Hill due to its low Public Transport Accessibility Levels (PTAL) and remote location. While long-term sustainable transport goals remain a priority, we also recognise the immediate need for flexibility to ensure development viability in the short term.</p> <p>The Infrastructure Delivery Plan (IDP), published on 30 September 2024, outlines phased public transport improvements starting from the first phase of development. The Council is committed to collaborating with TfL to refine these plans and align them with broader transport priorities.</p> <p><b>Indicative Costs, Timescales, and Funding Mechanisms</b></p> <p>We understand TfL's concerns about costed and phased transport infrastructure proposals. Enfield will continue to provide indicative costs in the IDP and engage with TfL to agree on a phased delivery strategy. This strategy will be supported by Section 106 agreements, Community Infrastructure Levy (CIL), and other funding mechanisms to ensure timely and effective delivery.</p> <p><b>Car Parking Principles</b></p> <p>The Council acknowledges TfL's recommendation to minimise parking in line with sustainable transport goals. The Council will also explore measures such as car clubs and active travel incentives to encourage a modal shift over time.</p> <p>The Council is committed to ongoing collaboration with TfL to:</p> <ul style="list-style-type: none"> <li>Review how parking policies are applied in specific developments to</li> </ul>

	Section	TfL Reg-18 comment	TfL Reg-19 comment	Enfield Response August 2024	TfL response September-November 2024	Enfield Response 20 December 2024
						<p>ensure consistency with sustainable travel priorities.</p> <ul style="list-style-type: none"> <li>• Strengthen measures to reduce car parking provision in well-connected areas and for developments that provide exceptional sustainable transport infrastructure.</li> <li>• Enhance monitoring mechanisms to track the shift toward sustainable travel behaviors as policies like controlled parking zones and cycling infrastructure are implemented.</li> </ul> <p><b>Masterplanning and Supplementary Planning Documents (SPDs)</b></p> <p>The Council is committed to preparing a Supplementary Planning Document (SPD) for Crews Hill to ensure a coordinated approach to development and infrastructure delivery.</p> <p>The SPD will provide detailed guidance on transport corridors, localised impacts, parking standards, and proximity to public transport infrastructure. For example, the inconsistency in wording between SA11.1 and SA11.3 regarding development within 400 metres of a bus stop will be addressed within the SPD to ensure clear and consistent guidance.</p> <p>The SPD process will involve engagement with TfL and other stakeholders to align with strategic transport objectives and ensure a comprehensive framework for all site allocations within the placemaking area.</p> <p><b>Coordination and Duty to Cooperate</b></p> <p>The Council remains committed to fulfilling its Duty to Cooperate obligations and ensuring transparent collaboration with TfL and other stakeholders. Future updates to the IDP and SPD will reflect this ongoing partnership.</p> <p><b>Ensuring Good Growth</b></p> <p>Enfield shares TfL's commitment to Good Growth and aims to align development at Crews Hill with London</p>



	Section	TfL Reg-18 comment	TfL Reg-19 comment	Enfield Response August 2024	TfL response September-November 2024	Enfield Response 20 December 2024
						Plan objectives. By balancing immediate development needs with long-term sustainability goals, the Council seeks to create a thriving and connected community.
42.	SA11.2 Land South of Cattlegate Road, Crews Hill	N/A	<p>The requirements should state that any car parking must be minimised and be consistent with the ambition of achieving 75 per cent sustainable transport mode share. This will require car parking substantially lower than London Plan maximum standards and should consider future rather than existing PTAL.</p> <p>Although there is a requirement for a public transport bridge over the railway, the infrastructure requirements should also make explicit the need for substantial contributions towards public transport to improve connectivity to a Level comparable with urban placemaking areas in the borough.</p> <p>We note that there is no reference to development being within 400 metres of a bus stop which is included in the design principles for SA11.1 and SA11.3.</p> <p>A costed and agreed Infrastructure Delivery Plan should be submitted to outline the full package of transport infrastructure for all Crews Hill sites. TfL is concerned that by breaking up the Crews Hill placemaking area into six separate site allocations, parts of the placemaking area could come forward in advance of agreement on the infrastructure requirements (and costs) that will be needed for the area as a whole.</p>	<p>In terms of transport infrastructure, LBE's position is clear that making the provision of, or enhancements to, public transport infrastructure will start to be delivered from the 1st phase of the development. This has been costed and will be phased through the emerging IDP. The delivery of public transport infrastructure from an early phase will help reduce car trips and encourage a model shift away from the use of the car. It will also enable future improvements to public transport infrastructure. The emerging delivery strategies will detail the type of public transport provision to be provided for the sites. The result will be that the developments become more sustainable places as they're built out.</p>	<p>Our previous comments state our position and we do not think they have been adequately addressed.</p> <p>The costs for public transport infrastructure have not been shared or agreed with TfL and are not included in the emerging IDP. The emerging delivery strategies which will detail the type of public transport provision have not been shared or agreed with TfL.</p> <p>Also, refer to comments for Spatial Strategy SS1 and PL9 - 11 and Crews Hill in Appendix 1</p>	<p><b>Car Parking Standards</b></p> <p>Enfield understands TfL's recommendation to minimise car parking to achieve a 75% sustainable transport mode share. However, given Crews Hill's current low Public Transport Accessibility Level (PTAL) and its location on the borough's fringe, the Council maintains that flexibility in parking provision is necessary to ensure the viability of development at this stage.</p> <p>The Council will retain its current approach to limiting parking, balancing immediate needs with aspirations to reduce car dependency as public transport connectivity improves over time. Measures such as car clubs and active travel incentives will also be considered to support a gradual modal shift.</p> <p><b>Public Transport Infrastructure</b></p> <p>Enfield recognises the importance of improving public transport connectivity to support sustainable development at Crews Hill. The Infrastructure Delivery Plan (IDP), published on 30 September 2024, includes phased public transport improvements starting from the first phase of development. These early interventions aim to reduce car trips, encourage modal shift, and lay the groundwork for further enhancements to public transport infrastructure.</p> <p>While indicative costs and specific delivery strategies for public transport infrastructure are still under development, the Council remains committed to collaborating with TfL to refine these details. Future updates to the IDP will provide clarity on funding mechanisms, including Section 106 agreements and Community Infrastructure Levy (CIL) contributions.</p>

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						<p><b>Proximity to Bus Stops</b></p> <p>The Council acknowledges TfL's observation regarding the absence of a requirement for development to be located within 400 metres of a bus stop in SA11.2. While the forthcoming Supplementary Planning Document (SPD) for Crews Hill is intended to provide detailed guidance and ensure consistent design principles, the Council is open to exploring amendments to the relevant site allocation policies, including SA11.2, to explicitly incorporate requirements for development to be located within 400 metres of a bus stop where feasible. This will ensure that accessibility standards are embedded within the policy framework, providing greater clarity and alignment with sustainable transport objectives..</p> <p><b>Phased Development and Coordination</b></p> <p>Enfield recognises the risks of piecemeal development and is committed to ensuring that infrastructure delivery is coordinated across all Crews Hill site allocations. The Council will work closely with TfL and other stakeholders to align infrastructure requirements and costs for the placemaking area as a whole.</p> <p>The emerging delivery strategies will outline the type of public transport provision for each site, ensuring that all developments contribute proportionately to infrastructure improvements. Enfield will engage with TfL during the masterplanning and SPD processes to address outstanding concerns and refine the framework for development.</p>
43.	SA11.3 Land South of M25, Crews Hill	N/A	The requirements should state that any car parking must be minimised and be consistent with the ambition of achieving 75 per cent sustainable transport mode share. This will require car parking substantially lower than London Plan maximum standards and	In terms of transport infrastructure, LBE's position is clear that making the provision of, or enhancements to, public transport infrastructure will start to be delivered from the 1st phase of the development. This has been costed and will be phased through the emerging IDP. The delivery of public transport infrastructure from an early phase will	Our previous comments state our position and we do not think they have been adequately addressed.  The costs for public transport infrastructure have not been shared or agreed with TfL and are not included in the emerging IDP. The emerging delivery strategies which will detail the	<p><b>Car Parking Standards</b></p> <p>The Council acknowledges TfL's recommendation to minimise car parking to align with the ambition of achieving a 75% sustainable transport mode share. However, given Crews Hill's remote location, its current low PTAL, and feedback from developers,</p>

	Section	TfL Reg-18 comment	TfL Reg-19 comment	Enfield Response August 2024	TfL response September-November 2024	Enfield Response 20 December 2024
			<p>should consider future rather than existing PTAL.</p> <p>Although there is a requirement for a public transport bridge over the railway, the infrastructure requirements should also make explicit the need for substantial contributions towards public transport to improve connectivity to a level comparable with urban placemaking areas in the borough.</p> <p>We note that development of the site should limit development to areas within 400 metres of a bus stop which is preferred to the wording in SAIL.I which states that development of the site should locate development in areas within 400 metres of a bus stop.</p> <p>A costed and agreed Infrastructure Delivery Plan should be submitted to outline the full package of transport infrastructure for all Crews Hill sites. TfL is concerned that by breaking up the Crews Hill placemaking area into six separate site allocations, parts of the placemaking area could come forward in advance of agreement on the infrastructure requirements (and costs) that will be needed for the area as a whole.</p>	<p>help reduce car trips and encourage a model shift away from the use of the car. It will also enable future improvements to public transport infrastructure. The emerging delivery strategies will detail the type of public transport provision to be provided for the sites. The result will be that the developments become more sustainable places as they're built out.</p>	<p>type of public transport provision have not been shared or agreed with TfL.</p> <p>Also, refer to comments for Spatial Strategy SS1 and PL9 - 11 and Crews Hill in Appendix 1</p>	<p>the Council maintains that flexibility in parking provision is necessary to support development viability.</p> <p>The existing principle of providing limited parking will remain, balancing immediate needs with long-term aspirations to reduce car dependency. The Council will also explore measures such as car clubs and active travel incentives to support a gradual shift towards sustainable transport options.</p> <p><b>Public Transport Infrastructure</b></p> <p>The Council is committed to improving public transport connectivity as part of the Crews Hill placemaking strategy. The Infrastructure Delivery Plan (IDP), published on 30 September 2024, outlines the phased delivery of public transport enhancements starting from the first phase of development. These improvements aim to reduce car trips, encourage a modal shift, and lay the groundwork for future enhancements.</p> <p>While specific costs and delivery strategies for public transport infrastructure are still under development, the Council remains committed to collaborating with TfL to refine and agree on these details. Updates to the IDP will include indicative costs, funding mechanisms (e.g., Section 106 agreements and Community Infrastructure Levy contributions), and phased delivery plans.</p> <p><b>Proximity to Bus Stops</b></p> <p>The Council notes TfL's preference for the wording in SA11.3, which limits development to areas within 400 metres of a bus stop. The Council agrees that this wording provides clearer guidance and will ensure that consistency across site allocations is addressed through the forthcoming Supplementary Planning Document (SPD) for Crews Hill.</p> <p><b>Phased Development and Coordination</b></p>

	Section	TfL Reg-18 comment	TfL Reg-19 comment	Enfield Response August 2024	TfL response September-November 2024	Enfield Response 20 December 2024
						<p>The Council recognises the risks of piecemeal development and is committed to ensuring that infrastructure delivery is coordinated across all Crews Hill site allocations. The emerging delivery strategies will detail the type of public transport provision for each site and ensure proportional contributions to shared infrastructure improvements.</p> <p>The Council will engage with TfL and other stakeholders during the masterplanning and SPD processes to address outstanding concerns and refine a coherent framework for development across the placemaking area.</p>
44.	SA11.4 Land North and South of Cattlegate Road, Crews Hill	N/A	<p>The requirements should state that any car parking must be minimised and be consistent with the ambition of achieving 75 per cent sustainable transport mode share. This will require car parking substantially lower than London Plan maximum standards and should consider future rather than existing PTAL.</p> <p>The infrastructure requirements should also make explicit the need for substantial contributions towards public transport to improve connectivity to a level comparable with urban placemaking areas in the borough.</p> <p>We note that there is no reference to development being within 400 metres of a bus stop which is included in the design principles for SA11.1 and SA11.3.</p> <p>A costed and agreed Infrastructure Delivery Plan should be submitted to outline the full package of transport infrastructure for all Crews Hill sites. TfL is concerned that by breaking up the Crews Hill placemaking area into six separate site allocations, parts of the placemaking area could come forward in advance of agreement on the infrastructure requirements (and costs) that will be needed for the area as a whole.</p>	<p>In terms of transport infrastructure, LBE's position is clear that making the provision of, or enhancements to, public transport infrastructure will start to be delivered from the 1st phase of the development. This has been costed and will be phased through the emerging IDP. The delivery of public transport infrastructure from an early phase will help reduce car trips and encourage a model shift away from the use of the car. It will also enable future improvements to public transport infrastructure. The emerging delivery strategies will detail the type of public transport provision to be provided for the sites. The result will be that the developments become more sustainable places as they're built out.</p>	<p>Our previous comments state our position and we do not think they have been adequately addressed.</p> <p>The costs for public transport infrastructure have not been shared or agreed with TfL and are not included in the emerging IDP. The emerging delivery strategies which will detail the type of public transport provision have not been shared or agreed with TfL.</p> <p>Also, refer to comments for Spatial Strategy SS1 and PL9 - 11 and Crews Hill in Appendix 1</p>	See response to SA11.1 to 11.3 above.

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45.	SA11.5 Land East of Theobalds Park Road, Crews Hill	N/A	<p>The requirements should state that any car parking must be minimised and consistent with the ambition of achieving 75 per cent sustainable transport mode share, This will require car parking substantially lower than London Plan maximum standards and should consider future rather than existing PTAL.</p> <p>The infrastructure requirements should also make explicit the need for substantial contributions towards public transport to improve connectivity to a level comparable with urban placemaking areas in the borough.</p> <p>We note that there is no reference to development being within 400 metres of a bus stop which is included in the design principles for SA11.1 and SA11.3.</p> <p>A costed and agreed Infrastructure Delivery Plan should be submitted to outline the full package of transport infrastructure for all Crews Hill sites. TfL is concerned that by breaking up the Crews Hill placemaking area into six separate site allocations, parts of the placemaking area could come forward in advance of agreement on the infrastructure requirements (and costs) that will be needed for the area as a whole.</p>	<p>In terms of transport infrastructure, LBE's position is clear that making the provision of, or enhancements to, public transport infrastructure will start to be delivered from the 1st phase of the development. This has been costed and will be phased through the emerging IDP. The delivery of public transport infrastructure from an early phase will help reduce car trips and encourage a model shift away from the use of the car. It will also enable future improvements to public transport infrastructure. The emerging delivery strategies will detail the type of public transport provision to be provided for the sites. The result will be that the developments become more sustainable places as they're built out.</p>	<p>Our previous comments state our position and we do not think they have been adequately addressed.</p> <p>The costs for public transport infrastructure have not been shared or agreed with TfL and are not included in the emerging IDP. The emerging delivery strategies which will detail the type of public transport provision have not been shared or agreed with TfL.</p> <p>Also, refer to comments for Spatial Strategy SS1 and PL9 - 11 and Crews Hill in Appendix 1</p>	See response to SA11.1 to 11.3 above.
46.	SA11.6 Land South West of Theobalds Park Road, Crews Hill	N/A	<p>The requirements should state that any car parking must be minimised and be consistent with the ambition of achieving 75 per cent sustainable transport mode share. This will require car parking substantially lower than London Plan maximum standards and should consider future rather than existing PTAL.</p> <p>Although there is a requirement for a public transport bridge over the railway, the infrastructure requirements should also make explicit the need for substantial contributions towards public transport to improve connectivity to a level comparable with urban placemaking areas in the borough.</p>	<p>In terms of transport infrastructure, LBE's position is clear that making the provision of, or enhancements to, public transport infrastructure will start to be delivered from the 1st phase of the development. This has been costed and will be phased through the emerging IDP. The delivery of public transport infrastructure from an early phase will help reduce car trips and encourage a model shift away from the use of the car. It will also enable future improvements to public transport infrastructure. The emerging delivery strategies will detail the type of public transport provision to be provided for the sites. The result will be that the</p>	<p>Our previous comments state our position and we do not think they have been adequately addressed.</p> <p>The costs for public transport infrastructure have not been shared or agreed with TfL and are not included in the emerging IDP. The emerging delivery strategies which will detail the type of public transport provision have not been shared or agreed with TfL.</p> <p>Also, refer to comments for Spatial Strategy SS1 and PL9 - 11 and Crews Hill in Appendix 1</p>	See response to SA11.1 to 11.3 above.

	Section	TfL Reg-18 comment	TfL Reg-19 comment	Enfield Response August 2024	TfL response September-November 2024	Enfield Response 20 December 2024
			<p>We note that there is no reference to development being within 400 metres of a bus stop which is included in the design principles for SA11.1 and SA11.3.</p> <p>A costed and agreed Infrastructure Delivery Plan should be submitted to outline the full package of transport infrastructure for all Crews Hill sites. TfL is concerned that by breaking up the Crews Hill placemaking area into six separate site allocations, parts of the placemaking area could come forward in advance of agreement on the infrastructure requirements (and costs) that will be needed for the area as a whole.</p>	developments become more sustainable places as they're built out.		
47.	SAURB 01 Brimsdown Sports Ground	N/A	We welcome the requirement that development should minimise parking.	Noted	-	-
48.	SA URB.02 Cockfosters Station Car Park	N/A	<p>There is a requirement to contribute towards identified TfL upgrades to London Underground network serving Arnos Grove. This is welcomed although it should read Cockfosters rather than Arnos Grove. Step free access has already been provided at Cockfosters station so any contributions would need to focus on general station access or capacity improvements. This could include streetscape improvements including better crossing facilities outside the station to enhance accessibility and safety for station users.</p> <p>Although we welcome the requirement that it should deliver car free development the wording needs to be amended to state that it 'must deliver car free development' to ensure consistency with the London Plan taking account of the PTAL of 6a.</p>	Noted and agreed	Noted and welcomed.	<p><b>Existing wording:</b></p> <p>ii) "The development should contribute towards identified TfL upgrades to London Underground network serving Arnos Grove."</p> <p>L) "The development should deliver car free development."</p> <p><b>Proposed modifications to SA URB.02</b></p> <p>ii) "The development <u>must</u> contribute towards identified TfL upgrades to the London Underground network serving Cockfosters station. <u>Contributions should focus on general station access or capacity improvements, including streetscape enhancements and improved crossing facilities to enhance accessibility and safety for station users.</u>"</p> <p>L) "The development <u>must</u> deliver car free development, <u>consistent with the London Plan, reflecting the site's PTAL of 6a.</u>"</p>

	Section	TfL Reg-18 comment	TfL Reg-19 comment	Enfield Response August 2024	TfL response September-November 2024	Enfield Response 20 December 2024
49.	SA URB.03 Former Chase Park Farm Hospital	N/A	We welcome the requirement that development should minimise residential parking.	Noted	-	-
50.	SA URB 04 Blackhorse Tower, Cockfoster Road	N/A	<p>There is a requirement to contribute towards identified TfL upgrades to London Underground network serving Arnos Grove. This is welcomed although it should read Cockfosters rather than Arnos Grove. Step free access has already been provided at Cockfosters station so any contributions would need to focus on general station access or capacity improvements. This should include streetscape improvements including better crossing facilities outside the station to enhance accessibility and safety for station users.</p> <p>We welcome the requirement that it should deliver car free development.</p>	Noted and agreed	Noted and welcomed.	<p><b>Existing wording:</b></p> <p>ii) "The development should contribute towards identified TfL upgrades to London Underground network serving Arnos Grove."</p> <p>M) "The development should deliver car free development."</p> <p><b>Proposed modifications to SA URB.04</b></p> <p>ii) "The development <u>must</u> contribute towards identified TfL upgrades to the London Underground network serving <u>Cockfosters station</u>. <u>Contributions should focus on general station access or capacity improvements, including streetscape enhancements and improved crossing facilities to enhance accessibility and safety for station users.</u>"</p> <p>M) "The development <u>must</u> deliver car free development, <u>consistent with the London Plan, reflecting the site's PTAL of 6a.</u>"</p>
51.	SA URB 07 Sainsburys, Green Lanes	N/A	We welcome the requirement that development should minimise parking. This should apply to all proposed uses including residential, commercial and re-provision of the retail store.	Noted	Our previous comments state our position and we do not think they have been adequately addressed	<p><b>Existing wording:</b></p> <p>L. should minimise parking to promote active travel. Where required, on-street parking is preferred and should be integrated into the public realm, interspersed with tree planting. Podium parking for non-residential uses must avoid the creation of long stretches of inactive frontage.</p> <p><b>Proposed modifications to SA URB.07</b></p> <p>L. <del>should</del> <u>must</u> minimise parking <u>across all proposed uses, including residential, commercial, and the re-provision of the retail store, in line with London Plan policies to promote active travel. Where required, on-street parking is preferred and should be integrated into the public</u></p>

	Section	TfL Reg-18 comment	TfL Reg-19 comment	Enfield Response August 2024	TfL response September-November 2024	Enfield Response 20 December 2024
						realm, interspersed with tree planting. Podium parking for non-residential uses must avoid the creation of long stretches of inactive frontage.
52.	SA URB.08: Hoe, Eastfield, Cherry and Bouvier Estates	N/A	We welcome the requirement that development should minimise residential parking.	Noted	-	-
53.	SA URB.09 Exeter Road Estate	N/A	We welcome the requirement that development should minimise parking. This should apply to all proposed uses including residential and commercial.	Noted	Our previous comments state our position and we do not think they have been adequately addressed	<p><b>Existing wording:</b></p> <p>I. should provide limited parking to promote active travel. If required, on-street parking should be integrated into the public realm, with long runs broken down with tree planting.</p> <p><b>Proposed modifications to SA URB.09</b></p> <p><u>v) The development should prioritise active travel measures and public transport improvements to reduce car dependency and support a modal shift towards sustainable transport options</u></p> <p><del>l) should provide limited parking across all proposed uses, including residential and commercial, in line with London Plan policies and the ambition to promote sustainable transport to promote active travel. If required, on-street parking should be integrated into the public realm, with long runs broken down with tree planting.</del></p>
54.	SA URB.10 Alma Estate	N/A	We note the requirement to provide limited parking. This should be amended to say that parking must be minimised to ensure consistency with the London Plan.	LBE notes the proposed modifications. If they are further proposed by the Inspector, LBE would be supportive of these modifications being made.	Noted and welcomed.	<p><b>Existing wording:</b></p> <p>I. should provide limited parking to promote active travel. If required, on-street parking should be integrated into the public realm, with long runs broken down with tree planting.</p> <p><b>Proposed modifications to SA URB.10</b></p> <p><u>v) The development should prioritise active travel measures and public transport improvements to reduce car dependency and support a modal shift towards sustainable transport options</u></p>



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						<p><del>I) should provide limited-must minimise parking across all proposed uses, including residential and commercial, in line with London Plan policies and the ambition to promote sustainable transport to promote active travel. If required, on-street parking should be integrated into the public realm, with long runs broken down with tree planting.</del></p>
55.	SA URB.12 241 Green Street	N/A	We note the requirement to provide limited parking. This should be amended to say that parking must be minimised to ensure consistency with the London Plan.	LBE notes the proposed modifications. If they are further proposed by the Inspector, LBE would be supportive of these modifications being made.	Noted and welcomed.	<p><b>Existing wording:</b></p> <p>J. should provide limited parking to promote active travel. If required, on-street parking should be integrated into the public realm, with long runs broken down with tree planting.</p> <p><b>Proposed modifications to SA URB.12</b></p> <p><u>v) The development should prioritise active travel measures and public transport improvements to reduce car dependency and support a modal shift towards sustainable transport options</u></p> <p><del>J) should provide limited-must minimise parking across all proposed uses, including residential and commercial, in line with London Plan policies and the ambition to promote sustainable transport to promote active travel. If required, on-street parking should be integrated into the public realm, with long runs broken down with tree planting.</del></p>
56.	SA URB.13: Hertford Road, Archers and Roman Way, Larksfield Grove, Caterhatch, Lytchet Way and Sherbourne Avenue Estate	N/A	We welcome the requirement that the development should minimise residential parking.	Noted	-	-
57.	SA URB.14 Four Hills	N/A	We welcome the requirement that the development should minimise residential parking.	Noted	-	-

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	Estate, Lavender Hill					
58.	SA URB.15 Kettering Road Estate	N/A	We welcome the requirement that the development should minimise residential parking.	Noted	-	-
59.	SA URB.16 188-200 Bowes Road	N/A	We welcome the requirement that the development should minimise parking. This should apply to residential and commercial uses.	Noted		<p><b>Existing wording:</b></p> <p>L) "The development should minimise parking..."</p> <p><b>Proposed modifications to SA URB.16</b></p> <p><u>v) The development should prioritise active travel measures and public transport improvements to reduce car dependency and support a modal shift towards sustainable transport options</u></p> <p><u>J) <del>should provide limited</del> must minimise parking across all proposed uses, for both residential and commercial uses to align with London Plan policies and support sustainable transport objectives to promote active travel. If required, on-street parking should be integrated into the public realm, with long runs broken down with tree planting.</u></p>
60.	SA URB.17 Main Avenue Estate	N/A	We welcome the requirement to contribute towards improvements to access and facilities at Bush Hill Park station.	Noted	-	-
61.	SA URB.18 Land at Ritz Parade	N/A	We note the requirement that the development should provide limited residential parking. This should be amended to say that parking must be minimised to ensure consistency with the London Plan.	LBE notes the proposed modifications. If they are further proposed by the Inspector, LBE would be supportive of these modifications being made.	Noted and welcomed.	<p><b>Existing wording:</b></p> <p>I) "The development should provide limited parking..."</p> <p><b>Proposed modifications to SA URB.18</b></p> <p>iii) <u>"The development should promote active travel and public transport usage by incorporating enhancements to pedestrian and cycling infrastructure and improving connectivity to nearby public transport services."</u></p> <p><u>I) must minimise parking, including for residential uses, to ensure consistency with the London Plan and to support</u></p>

	Section	TfL Reg-18 comment	TfL Reg-19 comment	Enfield Response August 2024	TfL response September-November 2024	Enfield Response 20 December 2024
						<u>sustainable transport objectives</u> to promote active travel...
62.	SA URB.19 Albany Leisure Centre	N/A	Although we welcome the requirement that the development should minimise residential parking, this should also apply to the re-provided leisure centre.	Noted	Our previous comments state our position and we do not think they have been adequately addressed	<p><b>Existing wording:</b></p> <p>J. should minimise residential parking to promote active travel. Where required, on-street parking is preferred and should be integrated into the public realm, with long runs broken down with tree planting.</p> <p><b>Proposed modifications to SA URB.19</b></p> <p>vi) The development <u>should incorporate measures to enhance active travel and public transport connectivity, including pedestrian and cycling infrastructure, to reduce car dependency and encourage sustainable transport options</u></p> <p>J. must minimise <u>parking for both residential uses and the re-provided leisure centre to ensure consistency with the London Plan and support sustainable transport objectives</u> to promote active travel. Where required, on-street parking is preferred and should be integrated into the public realm, with long runs broken down with tree planting</p>
63.	SA URB.20 Cuckoo Hall Lane Estate	N/A	We welcome the requirement that the development should minimise residential parking.	Noted	-	-
64.	SA URB.21 Moorfield Health Centre	N/A	We welcome the requirement that the development should minimise parking.	Noted	-	-
65.	SA URB.22 Oakwood Station Car Park	N/A	We welcome the requirement that the development must limit vehicular parking to drop off, servicing and accessible bays. We recommend that the wording is amended to clarify that this means car free development.	LBE notes the proposed modifications. If they are further proposed by the Inspector, LBE would be supportive of these modifications being made.	Noted and welcomed.	<p><b>Existing wording:</b></p> <p>J. must limit vehicular parking to drop off, servicing and accessible bays due the high accessibility level of the site and proximity to public transport.</p> <p><b>Proposed modifications to SA URB.22</b></p> <p>vi. The development <u>should prioritise active travel and public transport connectivity, incorporating measures to</u></p>

	Section	TfL Reg-18 comment	TfL Reg-19 comment	Enfield Response August 2024	TfL response September-November 2024	Enfield Response 20 December 2024
						<p><u>enhance pedestrian and cycling infrastructure and improve access to Oakwood Station.</u></p> <p>J. The development <u>must prioritise sustainable transport options and must be car free, reflecting the site's PTAL of 6a and ensuring alignment with the London Plan and sustainable transport objectives, while accommodating practical requirements for accessibility, servicing, and drop-off needs.</u></p>
66.	SA URB.23 Stoneleigh Avenue Estate	N/A	We support streetscape improvements but any proposals affecting the A10 or its frontage should be agreed with TfL. There should be no direct vehicle access (to parking or servicing) from the A10.	Noted	Our previous comments state our position and we do not think they have been adequately addressed.	<p><b>Proposed modifications to SA URB.23</b></p> <p>vi. the development <u>should prioritise enhancements to pedestrian and cycling infrastructure to promote active travel and improve connectivity while minimising reliance on private vehicles.</u></p> <p>I. <u>Streetscape improvements must be designed in collaboration with TfL, particularly for areas affecting the A10 or its frontage. There must be no direct vehicle access to parking or servicing from the A10 to ensure safety and compliance with strategic transport priorities.</u></p>
67.	SA URB.25 Pevensey Avenue	N/A	We welcome the requirement that the development should minimise residential parking.	Noted	-	-
68.	SA URB.26 Ford's Grove Car Park	N/A	We welcome the requirement that the development should minimise residential parking. We recommend that the wording is amended to clarify that the existing car park should not be re-provided.	LBE notes the proposed modifications. If they are further proposed by the Inspector, LBE would be supportive of these modifications being made.	Noted and welcomed.	<p><b>Existing wording:</b></p> <p>H) The development should minimise residential parking...</p> <p><b>Proposed modifications to SA URB.26</b></p> <p>iii) <u>The development should incorporate measures to promote active travel, enhance pedestrian and cycling infrastructure, and improve connectivity to nearby public transport facilities to reduce car dependency.</u></p> <p>H) The development <u>must minimise residential parking to support sustainable transport objectives and</u></p>

	Section	TfL Reg-18 comment	TfL Reg-19 comment	Enfield Response August 2024	TfL response September-November 2024	Enfield Response 20 December 2024
						<u>align with the London Plan</u> to promote active travel...
69.	SA URB.27 South Street	N/A	We note the requirement to provide limited residential parking. This should be amended to say that parking must be minimised to ensure consistency with the London Plan.	LBE notes the proposed modifications. If they are further proposed by the Inspector, LBE would be supportive of these modifications being made.	Noted and welcomed.	<p><b>Existing wording:</b></p> <p>H. should provide limited residential parking to promote active travel.</p> <p><b>Proposed modifications to SA URB.27</b></p> <p>iii) <u>The development should include measures to enhance active travel infrastructure, such as improved pedestrian and cycling connectivity, and promote the use of public transport to reduce car dependency.</u></p> <p>H) <u>The development must minimise residential parking to ensure consistency with the London Plan and to support sustainable transport objectives.</u></p>
70.	SA RUR.01 Land Opposite Enfield Crematorium	N/A	<p>The site has a PTAL of 1b and it is unlikely that further public transport and/or active travel improvements could be provided at a level that would be necessary to support the proposed 291 homes.</p> <p>We note that there is no requirement in the design principles that parking must be minimised. The result is likely to be a car dominated development which is not well connected and would not reflect the London Plan principles of Good Growth.</p> <p>We are likely to object to any proposed vehicle access direct from the A10 as specified in the design principles.</p>	Enfield will only consider proposals for these sites in line with London Plan and Enfield Local Plan transport policies. We acknowledge the current site public transport accessibility levels are poor and will work with TfL to explore solutions to improve public transport services and frequencies.	<p>Our previous comments state our position and we do not think they have been adequately addressed.</p> <p>London Plan Policy T6B states that developments not planned in well-connected areas should be designed to provide minimum necessary parking (car-lite).</p> <p>As stated, it is unlikely that there are solutions to provide public transport or active travel to a level required to support 291 homes.</p>	<p>No specific mention of parking minimisation.</p> <p><b>Proposed modifications to RUR 01</b></p> <p>iv) <u>Proposals must avoid direct vehicle access from the A10 to maintain safety and align with strategic transport priorities. Any access arrangements should be carefully designed to minimise disruption to the surrounding area and support sustainable transport objectives.</u></p> <p>v) <u>Given the site's current low PTAL, the Council acknowledges the challenges in providing high-quality public transport and active travel options. Enfield will work with TfL to explore potential solutions for improving transport services and connectivity, subject to feasibility and funding availability.</u></p> <p>vi) <u>The scale and density of development must be reviewed to ensure it aligns with the site's transport constraints, with any proposals demonstrating how they will achieve compliance with London Plan principles of Good Growth and sustainability.</u></p>

	Section	TfL Reg-18 comment	TfL Reg-19 comment	Enfield Response August 2024	TfL response September-November 2024	Enfield Response 20 December 2024
						<u>N) The development must minimise parking provision, consistent with London Plan Policy T6B, ensuring a car-lite design that reflects the site's low PTAL and prioritises sustainable transport options wherever feasible.</u>
71.	SA RUR.02 Land Between Camlet Way and Crescent Way	N/A	The site has a PTAL of 1 and it is unlikely that further public transport and/or active travel improvements could be provided at a level that would be necessary to support the proposed 160 homes. We note that there is requirement that development should minimise parking. Although we would support this, it could be undermined by the adopted Hadley Neighbourhood Plan which allows parking at a higher level than the London Plan. The Neighbourhood Plan presented evidence of the reliance on car use by existing residents, higher than anywhere else in the borough. The result is likely to be a car dominated development which is not well connected and would not reflect the London Plan principles of Good Growth.	Enfield will only consider proposals for these sites in line with London Plan and Enfield Local Plan transport policies. We acknowledge the current site public transport accessibility levels are poor and will work with TfL to explore solutions to improve public transport services and frequencies.	London Plan Policy T6B states that developments not planned in well-connected areas should be designed to provide minimum necessary parking (car-lite).  As stated, it is unlikely that there are solutions to provide public transport or active travel to a level required to support 160 homes.	<b>Existing wording:</b>  M) Development should minimise parking  <b>Proposed modifications to RUR 02</b>  iv) Proposals <u>must demonstrate how sustainable transport options, such as active travel measures and improvements to public transport connectivity, will be integrated into the development, subject to feasibility and funding availability. Any access arrangements should be designed to minimise car dependency.</u>  v) <u>Given the site's low PTAL, the scale and density of the proposed development must reflect the transport constraints. Proposals must outline a strategy to achieve compliance with London Plan principles of Good Growth, including measures to promote active travel and reduce car use.</u>  vi) <u>The Council will work collaboratively with TfL and other stakeholders to explore feasible solutions for improving public transport and active travel infrastructure in the area. However, development proposals must account for current constraints and ensure alignment with London Plan policies.</u>  M) <u>Development must minimise parking provision, in line with London Plan Policy T6B, ensuring a car-lite approach that reflects the site's low PTAL. Parking standards must prioritise sustainable transport objectives and align with the London Plan.</u>
72.	SA 2.2 Heritage House	N/A	We welcome the requirement that the development must reduce on site car parking. The reduction should bring car parking into Line with London Plan	Noted		<b>Existing wording:</b>  H. must reduce on-site car parking to promote active travel.

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			maximum standards for a site with a PTAL of 3— 4.			<p><b>Proposed modifications to SA2.2</b></p> <p>iii) <u>"The development should incorporate measures to promote active travel, enhance cycling and pedestrian connectivity, and improve access to public transport services to support sustainable travel objectives.</u></p> <p>H. <u>The development must reduce on-site car parking to align with London Plan maximum standards for a site with a PTAL of 3–4, prioritising sustainable transport options and reducing car dependency.</u></p>
73.	SA 2.8 Martinbridge Industrial Estate	N/A	We welcome the requirement to contribute towards bus service prioritisation and associated traffic management measures along A1010	Noted	-	-
74.	SA 5.7 Ravenside Retail Park	N/A	<p>We welcome the requirement to contribute towards increasing provision of more direct and frequent bus services to improve connectivity to and from industrial areas. Any enhanced bus services would need to be economically viable based on expected trip generation. We are currently working on updating options to provide bus services to Meridian Water phases 1 and 2 based on latest costs.</p> <p>We note the requirement that the development should provide limited parking. This should be amended to say that parking must be minimised to ensure consistency with the London Plan.</p> <p>We support streetscape improvements but any proposals affecting the North Circular Road or its frontage should be agreed with TfL. There should be no direct vehicle access (to parking or servicing) from the North Circular Road.</p>	LBE notes the proposed modifications. If they are further proposed by the Inspector, LBE would be supportive of these modifications being made.	Noted and welcomed.	<p><b>Existing wording:</b></p> <p>L. should provide limited parking to promote active travel.</p> <p><b>Proposed modifications to SA5.7</b></p> <p>v. <u>"Contributions should support the provision of more direct and frequent bus services to improve connectivity to and from industrial areas. Any proposals must be coordinated with TfL to ensure economic viability and long-term sustainability of enhanced services.</u></p> <p>L. <u>The development must minimise parking provision to align with London Plan standards and promote sustainable transport options. Parking provision should reflect the site's connectivity and encourage active and public transport use."</u></p> <p>N. <u>Streetscape improvements should be designed in collaboration with TfL, particularly for areas affecting the North Circular Road or its frontage. Direct vehicle access (to parking or servicing) from the North Circular Road is not permitted to maintain safety and transport efficiency.</u></p>

	Section	TfL Reg-18 comment	TfL Reg-19 comment	Enfield Response August 2024	TfL response September-November 2024	Enfield Response 20 December 2024
75.	SA 5.8 Kenninghall Metals and Waste	N/A	We welcome the requirement to contribute towards increasing provision of more direct and frequent bus services to improve connectivity to and from this site. Any enhanced bus services would need to be economically viable based on expected trip generation. It may be difficult to provide a viable bus service in the absence of guaranteed trips because there are not many frontages in this area.	Noted	-	<p><b>Existing wording:</b></p> <p>Not specified in detail.</p> <p><b>Proposed modifications to SA5.8</b></p> <p>Vi <u>The development must contribute towards increasing provision of more direct and frequent bus services to improve connectivity to and from the site, subject to economic viability and projected trip generation. The viability of such services will be determined in collaboration with TfL, considering the limited frontages in this area and expected demand.</u></p> <p>E. <u>The development should prioritise sustainable transport measures, including active travel infrastructure, to complement potential public transport enhancements. This may include improved pedestrian and cycling connections to nearby transport nodes.</u></p> <p>F. <u>The Council will work closely with TfL to explore feasible transport solutions that align with trip generation and long-term sustainability goals for this area.</u></p>
76.	SA URB.28 Land and Buildings South East of Stockings- water Lane	N/A	We note the requirement that the development should provide limited parking. This should be amended to say that parking must be minimised to ensure consistency with the London Plan.	LBE notes the proposed modifications. If they are further proposed by the Inspector, LBE would be supportive of these modifications being made.	Noted and welcomed.	<p><b>Existing</b></p> <p>H. should provide limited parking to promote active travel.</p> <p><b>Proposed modifications to URB 28</b></p> <p>iv) <u>The development should promote active and sustainable transport through improved pedestrian and cycling connections to nearby transport nodes and local amenities.</u></p> <p>H. <u>The development must minimise parking provision to align with London Plan standards, prioritising sustainable transport options and reducing reliance on private vehicles."</u></p>
77.	SA URB.29 Land to the South of Millmarsh lane	N/A	We welcome the requirement to contribute towards increasing provision of more direct and frequent bus services along A1055 to improve connectivity to and from industrial areas. Any enhanced bus services	LBE notes the proposed modifications. If they are further proposed by the Inspector, LBE would be supportive of these modifications being made.	Noted and welcomed.	<p><b>Existing</b></p> <p>L. should provide limited parking to promote active travel.</p>



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			<p>would need to be economically viable based on expected trip generation. It may be difficult to provide a viable bus service in the absence of guaranteed trips because there are not many frontages in this area.</p> <p>We note the requirement that the development should provide limited parking. This should be amended to say that parking must be minimised to ensure consistency with the London Plan.</p>			<p><b>Proposed modifications to URB 29</b></p> <p><u>iv) The development must contribute towards increasing provision of more direct and frequent bus services along the A1055 corridor to improve connectivity to and from industrial areas. Contributions must be informed by expected trip generation and coordinated with TfL to ensure economic viability, considering the limited frontages in this area.</u></p> <p>L The development <u>must minimise parking provision to ensure consistency with London Plan standards, prioritising sustainable transport options and reducing reliance on private vehicles.</u></p> <p>M. The development <u>should incorporate active travel infrastructure, such as enhanced pedestrian and cycling connections, to complement public transport improvements and support sustainable transport objectives.</u></p>
78.	SA URB.30 Montagu Industrial Estate	N/A	<p>We welcome the requirement to contribute towards increasing provision of more direct and frequent bus services along A1055 to improve connectivity to and from industrial areas, Any enhanced bus services would need to be economically viable based on expected trip generation. It may be difficult to provide a viable bus service in the absence of guaranteed trips because there are not many frontages in this area.</p> <p>We note the requirement that the development should provide limited parking. This should be amended to say that parking must be minimised to ensure consistency with the London Plan.</p>	LBE notes the proposed modifications. If they are further proposed by the Inspector, LBE would be supportive of these modifications being made.	Noted and welcomed.	<p><b>Existing wording:</b></p> <p>I. should contribute towards increasing provision of more direct and frequent bus services along A1055 to improve connectivity to and from industrial areas</p> <p><b>ii</b> should contribute towards enhanced pedestrian and cycle connectivity.</p> <p>M. should provide limited parking to promote active travel.</p> <p><b>Proposed modifications to URB 30</b></p> <p>i. <u>Must contribute towards improving direct and frequent bus services along the A1055, subject to economic viability based on expected trip generation and usage.</u></p> <p>ii. <u>Must incorporate active and sustainable transport connections, including safe pedestrian and cycling routes, to enhance accessibility to and from the industrial areas and integrate with the wider transport network</u></p> <p><b>iv</b> <u>Must engage with Transport for London (TfL) and other relevant stakeholders at an early stage to</u></p>

	Section	TfL Reg-18 comment	TfL Reg-19 comment	Enfield Response August 2024	TfL response September-November 2024	Enfield Response 20 December 2024
						<p><u>ensure transport infrastructure improvements, including bus service enhancements, are feasible and effectively coordinated</u></p> <p><b>M. must minimise parking provision to ensure consistency with the London Plan and promote sustainable modes of transport.</b></p>
79.	SA URB.31 Snowbirds Food Extension	N/A	We note the requirement that the development should provide limited parking. This should be amended to say that parking must be minimised to ensure consistency with the London Plan.	LBE notes the proposed modifications. If they are further proposed by the Inspector, LBE would be supportive of these modifications being made.	Noted and welcomed.	<p><b>Existing wording:</b></p> <p>I. should contribute towards enhanced pedestrian and cycle connectivity to Ponders End.</p> <p>E. should provide limited parking to promote active travel.</p> <p><b>Proposed modifications to URB 31</b></p> <p>i. <u>Must prioritise active and sustainable transport measures, including safe pedestrian and cycling connections, to enhance access to the site, Ponders End and surrounding areas.</u></p> <p>iii. <u>Must work collaboratively with Transport for London (TfL) and other relevant stakeholders to ensure that parking and transport measures align with local and regional transport strategies.</u></p> <p>E. <u>Must minimise parking provision to ensure consistency with the London Plan and promote sustainable and active modes of transport.</u></p>
80.	SA URB.32 Claverings Industrial Estate	N/A	We welcome the requirement to contribute towards increasing provision of more direct and frequent bus services along A1055 to improve connectivity to and from industrial areas. Any enhanced bus services would need to be economically viable based on expected trip generation. It may be difficult to provide a viable bus service in the absence of guaranteed trips because there are not many frontages in this area.	Noted	-	<p><b>Existing wording:</b></p> <p>I. should contribute towards increasing provision of more direct and frequent bus services along A1055 to improve connectivity to and from industrial areas.</p> <p>ii should contribute to enhanced pedestrian and cycle connectivity from Edmonton Green Station.</p> <p><b>Proposed modifications to URB 32</b></p> <p>i. <u>Must contribute to the provision of more direct and frequent bus services along the A1055 to improve connectivity</u></p>


	Section	TfL Reg-18 comment	TfL Reg-19 comment	Enfield Response August 2024	TfL response September-November 2024	Enfield Response 20 December 2024
						<p>to and from industrial areas. <u>Contributions should ensure that proposed bus service enhancements are economically viable based on expected trip generation.</u></p> <p><u>II Must incorporate active and sustainable transport options, including safe pedestrian and cycling routes to Edmonton Green station, to enhance site accessibility and reduce reliance on private vehicles.</u></p> <p><u>iv. Must engage with Transport for London (TfL) and other relevant stakeholders to ensure transport infrastructure improvements, including bus service enhancements, are well-coordinated and aligned with projected demand</u></p>
81.	SA URB.33 6 Morson Road	N/A	We note the requirement that the development should provide limited parking. This should be amended to say that parking must be minimised to ensure consistency with the London Plan.	LBE notes the proposed modifications. If they are further proposed by the Inspector, LBE would be supportive of these modifications being made.	Noted and welcomed.	<p><b>Existing wording:</b></p> <p>i. should contribute towards enhanced pedestrian and cycle connectivity.</p> <p>K. should provide limited parking to promote active travel.</p> <p><b>Proposed modifications to URB 33</b></p> <p><u>i. Must prioritise active and sustainable transport options, such as pedestrian and cycling infrastructure, to enhance connectivity to the site and the surrounding transport network.</u></p> <p><u>III Must engage with Transport for London (TfL) and other stakeholders to ensure parking and transport measures align with regional and local transport strategies.</u></p> <p><u>K. Must minimise parking provision to ensure consistency with the London Plan and support the promotion of sustainable modes of transport.</u></p>
82.	SA URB.34 5 Picketts Lock Lane	N/A	We welcome the requirement to contribute towards bus service prioritisation and associated traffic management measures along A1010. Any enhanced bus services would need to be economically viable based on expected trip generation. It may be difficult to provide a viable bus service	LBE notes the proposed modifications. If they are further proposed by the Inspector, LBE would be supportive of these modifications being made.	Noted and welcomed.	<p><b>Existing wording:</b></p> <p>I. should contribute towards bus service prioritisation and associated traffic management measures along A1010.</p>

	Section	TfL Reg-18 comment	TfL Reg-19 comment	Enfield Response August 2024	TfL response September-November 2024	Enfield Response 20 December 2024
			<p>in the absence of guaranteed trips because there are not many frontages in this area.</p> <p>We note the requirement that the development should provide limited parking. This should be amended to say that parking must be minimised to ensure consistency with the London Plan.</p>			<p>II. should contribute towards enhanced pedestrian and cycle connectivity – Ponders End Station.</p> <p>G. should provide limited parking to promote active travel.</p> <p><b>Proposed modifications to URB 34</b></p> <p>i. Must contribute to bus service prioritisation and associated traffic management measures along the A1010 to enhance connectivity. Contributions should ensure that any enhanced bus services are economically viable, based on expected trip generation.</p> <p>ii. <u>Must facilitate active and sustainable transport measures, including pedestrian and cycling infrastructure, to improve access to the site, Ponders End station and surrounding areas.</u></p> <p>iv. <u>Must engage with Transport for London (TfL) and other stakeholders to align bus service improvements and parking measures with regional and local transport strategies.</u></p> <p>G. <u>Must minimise parking provision to ensure consistency with the London Plan, supporting sustainable travel and reducing car dependency.</u></p>
83.	SA RUR.03 Land West of Ramney Marsh	N/A	<p>We welcome the requirement to contribute towards increasing provision of more direct and frequent bus services along A1055 to improve connectivity to and from industrial areas. Any enhanced bus services would need to be economically viable based on expected trip generation. It may be difficult to provide a viable bus service in the absence of guaranteed trips because there are not many frontages in this area.</p> <p>We note the requirement to provide limited parking. This should be amended to say that parking must be minimised to ensure consistency with the London Plan.</p>	LBE notes the proposed modifications. If they are further proposed by the Inspector, LBE would be supportive of these modifications being made.	Noted and welcomed.	<p><b>Existing wording:</b></p> <p>I. should contribute towards increasing provision of more direct and frequent bus services along A1055 to improve connectivity to and from industrial areas.</p> <p>II. should contribute towards enhanced pedestrian and cycle connectivity from Enfield Lock Station.</p> <p>K. should provide limited parking to promote active travel.</p> <p><b>Proposed modifications to RUR 03</b></p> <p>I. <u>Must contribute to the provision of more direct and frequent bus services along the A1055 to improve connectivity to and from industrial areas. Contributions should ensure that any</u></p>

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						<p><u>enhanced bus services are economically viable, based on expected trip generation.</u></p> <p>II. <u>Must facilitate active and sustainable transport measures, including safe pedestrian and cycling infrastructure, to improve site access and connectivity from Enfield Lock station with the surrounding area.</u></p> <p>K. <u>Must minimise parking provision to ensure consistency with the London Plan, supporting sustainable travel and reducing reliance on private vehicles.</u></p>
84.	SA27 Land at Crews Hill	See comments above under SP PL9 which are relevant to this site allocation.	See comments above for individual Land parcels which make up the Crews Hill area.	In terms of transport infrastructure, LBE's position is clear that making the provision of, or enhancements to, public transport infrastructure will start to be delivered from the 1st phase of the development. This has been costed and will be phased through the emerging IDP. The delivery of public transport infrastructure from an early phase will help reduce car trips and encourage a model shift away from the use of the car. It will also enable future improvements to public transport infrastructure. The emerging delivery strategies will detail the type of public transport provision to be provided for the sites. The result will be that the developments become more sustainable places as they're built out.	Refer to comments for Spatial Strategy SS1 and PL9 - 11 and Crews Hill in Appendix 1	Refer to responses made to SA11.1 to 11.6.
85.	SA28 Land at Chase Park	See comments above under SP PL10 which are relevant to this site allocation.	See comments above for individual land parcels which make up the Chase Park area.	In terms of transport infrastructure, LBE's position is clear that making the provision of, or enhancements to, public transport infrastructure will start to be delivered from the 1st phase of the development. This has been costed and will be phased through the emerging IDP. The delivery of public transport infrastructure from an early phase will help reduce car trips and encourage a model shift away from the use of the car. It will also enable future improvements to public transport infrastructure. The emerging delivery strategies will detail the type of public transport provision to be provided for the sites. The result will be that the	Refer to comments for Spatial Strategy SS1 and PL9 -11 and Chase Park in Appendix 1	Refer to responses made to SA10.1 to 10.4. .

	Section	TfL Reg-18 comment	TfL Reg-19 comment	Enfield Response August 2024	TfL response September-November 2024	Enfield Response 20 December 2024
				developments become more sustainable places as they're built out.		
86.	SA RUR.04 Land east of junction 24/ SA54	Without substantial investment in active travel and public transport connectivity, which is likely to be costly and may not be viable, we would be concerned that this site is likely to be dependent on car access due to the proximity to the motorway junction and relatively poor public transport connectivity with a PTAL of 1a-b.	We note the requirements to contribute towards increasing provision of more direct and frequent bus services to improve connectivity and to contribute towards enhanced walking and cycling connectivity from Hadley Wood station. However, recent work by TfL has confirmed that more direct and frequent bus services would be costly to provide and are unlikely to be sustainable in the long-term.	Enfield will only consider proposals for these sites in line with London Plan and Enfield Local Plan transport policies. We acknowledge the current site public transport accessibility levels are poor and will work with TfL to explore solutions to improve public transport services and frequencies.	As stated, it is unlikely that improved public transport services to serve this site would be sustainable in the long-term.	<p><b>Existing wording:</b></p> <p>I. should contribute towards increasing provision of more direct and frequent bus services to improve connectivity.</p> <p>II. should contribute towards enhanced pedestrian and cycle connectivity from Hadley Wood Station.</p> <p><b>Proposed modifications to RUR 04</b></p> <p>i. <u>Must contribute towards improving public transport connectivity, including exploring opportunities for more direct and frequent bus services. Contributions must align with the London Plan and Enfield Local Plan transport policies. Where viable, proposals should support phased improvements to public transport services to enhance long-term sustainability.</u></p> <p>II <u>Must prioritise investment in active travel measures, including enhanced walking and cycling infrastructure, to improve connectivity to Hadley Wood station and surrounding areas. Developments should integrate safe, accessible, and direct active travel routes to reduce reliance on private vehicles.</u></p> <p>IV. <u>Must prepare a comprehensive sustainable transport strategy that addresses the site's isolation and current low PTAL levels. This strategy should outline: A) Contributions to active travel and public transport enhancements. B) Measures to encourage walking, cycling, and shared mobility options. C) Commitments to long-term monitoring and adjustment of transport intervention</u></p> <p><u>Enfield will work closely with Transport for London (TfL) to explore innovative solutions for improving public transport services, ensuring alignment with regional transport objectives and recognising the challenges of sustaining long-term service improvements.</u></p>

	Section	TfL Reg-18 comment	TfL Reg-19 comment	Enfield Response August 2024	TfL response September-November 2024	Enfield Response 20 December 2024
87.	SA RUR.05 Land to the north west of Innova Park	N/A	<p>We welcome the requirement to contribute towards increasing provision of more direct and frequent bus services along A1055 to improve connectivity to and from industrial areas. Any enhanced bus services would need to be economically viable based on expected trip generation. It may be difficult to provide a viable bus service in the absence of guaranteed trips because there are not many frontages in this area.</p> <p>We note the requirement to provide limited parking. This should be amended to say that parking must be minimised to ensure consistency with the London Plan.</p>	LBE notes the proposed modifications. If they are further proposed by the Inspector, LBE would be supportive of these modifications being made.	Noted and welcomed.	<p><b>Existing wording:</b></p> <p>I. should contribute towards increasing provision of more direct and frequent bus services along A1055 to improve connectivity to and from industrial areas</p> <p>II. should contribute towards enhanced pedestrian and cycle connectivity.</p> <p>I. should provide limited parking to promote active travel.</p> <p><b>Proposed modifications to RUR 05</b></p> <p><u>I Must contribute towards increasing the provision of more direct and frequent bus services along the A1055 to enhance connectivity to and from industrial areas. Contributions should ensure that any enhanced bus services are economically viable, based on expected trip generation and anticipated demand.</u></p> <p><u>II. Must facilitate active and sustainable transport measures, including the provision of safe and accessible walking and cycling infrastructure to connect the site with nearby areas and transport networks.</u></p> <p><u>IV Must engage with Transport for London (TfL) and other relevant stakeholders to ensure that public transport improvements, active travel measures, and parking strategies align with local and regional transport policies.</u></p> <p><u>I. Must minimise parking provision to ensure consistency with the London Plan, prioritising sustainable transport modes and reducing dependency on private vehicles.</u></p>
88.	SA RUR.06 Land at Picketts Lock	N/A	We welcome the requirement to contribute towards bus service prioritisation and associated traffic management measures along A1010.	Noted		<p><b>Existing wording:</b></p> <p>I. should contribute towards bus service prioritisation and associated traffic management measures along A1010.</p> <p>II. should contribute towards enhanced pedestrian and cycle connectivity – Ponders End Station.</p>

	Section	TfL Reg-18 comment	TfL Reg-19 comment	Enfield Response August 2024	TfL response September-November 2024	Enfield Response 20 December 2024
						<p><b>Proposed modifications to RUR 06</b></p> <p>I. <u>Must contribute towards bus service prioritisation and associated traffic management measures along the A1010 to enhance public transport efficiency and connectivity.</u></p> <p>II. <u>Must incorporate active travel and sustainable transport measures, including pedestrian and cycling infrastructure, to improve site accessibility and reduce reliance on private vehicles.</u></p> <p>iv. <u>Must engage with Transport for London (TfL) and other stakeholders to ensure that transport improvements are effectively integrated into local and regional transport strategies.</u></p>
89.	SA RUR.07 Whitewebbs Golf Course and Land at Tottenham Hotspur FC training ground/SA62	This site is likely to be dependent on car access due to the relatively poor connectivity by active travel or public transport with a PTAL of 1a-b. The site proposals (including ancillary related facilities) should exclude major trip generating uses unless there is substantial investment in viable public transport and active travel improvements.	We reiterate our comments about excluding major trip generating uses from the site allocation due to the relatively poor connectivity.	Enfield will only consider proposals for these sites in line with London Plan and Enfield Local Plan transport policies. We acknowledge the current site public transport accessibility levels are poor and will work with TfL to explore solutions to improve public transport services and frequencies.	<p>Our previous comments state our position and we do not think they have been adequately addressed.</p> <p>It is unlikely that improved public transport services to serve this site would be sustainable in the long-term.</p>	<p><b>Existing wording:</b></p> <p>I. should contribute towards enhanced pedestrian and cycle connectivity.</p> <p><b>Proposed modifications to RUR 07</b></p> <p>I. <u>Must prioritise active travel infrastructure, including safe and direct walking and cycling routes that connect the site to nearby centres, transport nodes, and green spaces.</u></p> <p>II. <u>Should limit major trip-generating uses to those directly related to the site's primary uses: nature recovery uses and professional sport, recreation, and community sports/leisure uses, including ancillary related facilities and supported by targeted transport improvements.</u></p> <p>III. <u>Should contribute to improving public transport connectivity by exploring opportunities for targeted bus service enhancements that reduce reliance on private vehicles. These improvements must be practical, proportionate, and aligned with the site's specific context and anticipated trip generation.</u></p> <p>N. <u>Must minimise parking provision, consistent with the London Plan, and ensure parking is designed to serve only the site's intended uses.</u></p>



	Section	TfL Reg-18 comment	TfL Reg-19 comment	Enfield Response August 2024	TfL response September-November 2024	Enfield Response 20 December 2024
						<u>O Should include robust travel plans to mitigate reliance on private vehicles and support sustainable access.</u>
90.	SA URB.36 Church Street recreation ground	N/A	We support streetscape improvements but any proposals affecting the A10 or its frontage including the proposed vehicle access to the crematorium should be discussed and agreed with TfL before inclusion in the site allocation.	Noted		<p><b>Existing wording:</b></p> <p>I. should contribute towards enhanced pedestrian and cycle connectivity.</p> <p>A. must provide streetscape improvements along the A10 promoting active travel, for example wider footpaths, trees, planting, and the incorporation of street furniture.</p> <p><b>Proposed modifications to SA URB.36</b></p> <p><u>I. Should prioritise the integration of active travel measures, including safe and direct pedestrian and cycling connections to the site and surrounding areas.</u></p> <p><u>II. Must ensure that any proposals affecting the A10 or its frontage, including the proposed vehicle access to the crematorium, are discussed and agreed with TfL prior to being finalised or implemented.</u></p> <p><u>III. Must include traffic management measures that minimise disruption to the A10, ensure safe access to the site, and align with local and regional transport policies.</u></p> <p><u>A. Must include streetscape enhancements that improve pedestrian and cycling accessibility and create a safer, more attractive environment for example wider footpaths, trees, planting, and the incorporation of street furniture.</u></p>