



Date: **8 September 2021**

Contact: Planning Policy Team

Dear Helen

## **Consultation on Enfield Draft Local Plan (Reg 18) August 2021**

Thank you for the opportunity to comment on Enfield Council's Draft Local Plan which sets out Enfield's preferred policy approaches for its emerging new Local Plan.

### Duty-to-Cooperate

The London Borough of Haringey adopted a new suite of Local Plan documents in July 2017. These were informed by engagement with Enfield through the plan-making process. Haringey remains committed to working with Enfield on strategic matters and cross-boundary issues, particularly in respect of the Upper Lea Valley Opportunity Area and the New Southgate area where both boroughs have strategic objectives for managing growth and development. In this regard, please find our comments below.

### Vision and Objectives

Haringey broadly supports the Draft Local Plan (Reg 18) vision which is that by 2039 Enfield will be a place of growing opportunity for future generations, the green lung of London where new homes and jobs help all of Enfield's communities thrive. We note Enfield Council's ambition to deliver housing growth, employment floorspace in town centres and address existing poverty and inequality in the borough. We also note the strategic objectives which have been developed for the Plan and which underpin its policies, including to respond to the climate emergency.

### Growth Strategy

Haringey notes the significant challenges Enfield faces in accommodating growth having regard to the fact it is a very constrained borough. Enfield's Draft Local Plan sets out three spatial growth strategy options to provide sustainable growth across the Borough. Haringey broadly supports Enfield identifying Option 2 – 'Medium growth 1' as its preferred spatial strategy which provides 25,000 new homes over 20 years and meets other land use requirements in full, or close to full. We note the preferred option is consistent with Enfield's target for net housing completions in the London Plan 2021 which equates to 1246 homes per annum. Haringey also supports Enfield's commitment to protect and enhance areas of Green Belt and Metropolitan Open Land to maintain their function, quality and openness as described in policy BG1.

We note that a robust policy on strategic infrastructure is in place to ensure that sufficient infrastructure will be delivered to accommodate additional growth (see below).

### Strategic Infrastructure

Haringey supports Strategic Policy SS1 which aims to provide for sustainable growth with supporting infrastructure across the Borough whilst facilitating nature recovery and improvements to green and blue spaces and access to them. We welcome Strategic Policy T1 which identifies new and planned major transport infrastructure investment which is expected to be delivered in Enfield over the plan period and will support growth and development in the borough.

Enfield's draft Infrastructure Delivery Plan (IDP), published in June 2021, identifies infrastructure needs to support future growth of 25,000 new homes over the next 15-year period. The IDP identifies Enfield's needs comprehensively while highlighting some uncertainties around funding from Government departments and private providers, notably future delivery of Crossrail 2 and the four tracking of the West Anglia mainline between Tottenham Hale and Broxbourne. We particularly note Enfield's commitment to maintain strong relationships with transport providers to ensure that when provision issues are identified, steps can be taken to ensure that growth is delivered in a sustainable manner.

### Waste

Enfield Council has joined with Haringey and five other North London Boroughs to produce the North London Waste Plan (NLWP) which will form part of our respective Development Plans to help secure the sustainable management of waste in the region.

Haringey supports Strategic Objective 9 to support the North London Waste Plan by managing waste further up the waste hierarchy and Policy DM SE3 which introduces circular economy requirements for all major developments to help deliver this objective.

Haringey will continue to work with Enfield and the five other North London Boroughs in progressing the NLWP through to adoption and designating sites to meet an aggregated apportionment target across the seven North London Boroughs.

### Urban placemaking areas and site allocations

Haringey supports the inclusion of placemaking policies in Enfield's Draft Local Plan, and particularly the identification of New Southgate, Angel Edmonton and Meridian Water as Urban Placemaking areas having regard to the nature of the changes proposed and their location close to the boundary of Haringey.

New Southgate is designated as an Opportunity Area in the London Plan and as such Haringey welcomes working in close partnership with Enfield and Barnet on this key cross boundary development opportunity.

We note that Angel Edmonton is identified as a Town Centre with plans for further development and growth in this area, including housing. We have no comments on the proposals but wish to be kept updated on plans for this area due to its proximity to Haringey's North Tottenham Growth Area which is expected to accommodate significant amounts of new development in the future.

Haringey has been engaging with Enfield for some considerable time in relation to the delivery of Meridian Water. We have no comments on the Draft Local Plan proposal but would reiterate our desire for joint working to continue, especially to ensure that any transport and highways impacts on Haringey are suitably mitigated.

Haringey has no comments at this stage in relation to any other identified sites.

### Future engagement/ New Haringey Local Plan

The London Borough of Haringey is at an early stage of preparing its new Local Plan which will once adopted replace the adopted 2017 Plan. We are currently working towards a Regulation 18 draft Local Plan consultation in early 2022 which will prioritise a robust response to the climate emergency and provision of affordable housing, and we look forward to receiving feedback from Enfield on this.

Haringey remains committed to engaging with Enfield through the plan-making process, working together on strategic matters and cross-boundary issues, particularly in respect of New Southgate, Angel Edmonton and Meridian Water.

Yours sincerely,