



Date: 13/09/2021

Re: London Borough of Waltham Forest Response to the Reg 18 Draft Enfield Local Plan

Many thanks for consulting the London Borough of Waltham Forest concerning the Draft Local Plan for Enfield. As a neighbouring borough, and under the Duty-to-Cooperate agreement, we are delighted to be able to work collaboratively on joint and cross boundary strategic issues and support the London Borough of Enfield in meeting its strategic planning objectives. The London Borough of Waltham Forest can confirm that we are broadly supportive of the Draft Enfield Local Plan in its current form.

As your team are aware, Waltham Forest have reached an advanced stage in our Local Plan Preparation and Strategic Policies Document, which is in the early stages of its examination by the Secretary of State's Planning Inspectorate (PIIs)

We would like to make the following specific comments on response to the Draft (Reg 19) Pre-Submission Version of the Enfield Local Plan;

Introduction

We are supportive of the London Borough of Enfield's Draft Local Plan and its ability to meet its strategic obligations in the Plan Period to 2039 and were particularly reassured to see the reference to "working with partners and stakeholders, the Council has produced a positive plan for the future. The strategic vision and the policies included in this plan will address the challenges and set out a spatial strategy to deliver the Borough's strategic priorities". We are committed to reciprocating this arrangement with our ongoing relationship on cross-boundary strategic matters and other matters under the duty-to-cooperate.

Good Growth in Enfield

We agree with the context and key spatial issues set out by this document, but would recommend that specific references to the protection and mitigation of impacts arising from growth on the Epping Forest SAC and SSSI and the Lee Valley Regional Park including River Lee Navigation, River Lea are cemented into the Strategic Objectives. We are supportive of the Growth Strategy and will continue to work with the London Borough of Enfield on matters cross boundary matters.

Place

We are supportive of the place making principles set out in the Enfield Local Plan. We are committed to helping deliver growth that embodies high quality design and distinctive place making, especially on the allocated sites in the Enfield Local Plan that are on the borough boundary with Waltham Forest, within the Lee Valley Regional Park SSSI & RAMSAR and within the Zone of Influence of the Epping Forest SAC & SSSI. A key emerging area of transformational change on the borough boundary is Meridian Water. This is located directly to the east is the London Borough of

Waltham Forest's North Circular Strategic Location - an important employment corridor identified in our Local Plan as a key area for development and investment. It is an area with a rich heritage of industrial innovation and has the potential to play an important role in the London and local economy now and in the future.

The close proximity of the significant landscape of the Lea Valley (including Banbury Reservoir), the London Borough of Waltham Forest's North Circular Strategic Location and the emerging mixed use community at Meridian Water, offers a unique opportunity to strengthen links between our boroughs and, when considered holistically, to create unified well-connected places supporting existing and new communities. We look forward to continuing to develop the cross-borough partnership approach for this area in the coming months and years.

Please note a correction is needed on page 116 which incorrectly states that Banbury Reservoir it is in the London Borough of Haringey - it is in the London Borough of Waltham Forest.

Sustainable Enfield

We are supportive of the comprehensive approach taken by the policies in this chapter to deliver the growth projected in the Local Plan period and beyond in a sustainable manner and the package of mitigation measures that will help the London Borough of Enfield respond to the various environmental and climate challenges detailed the Plan.

Addressing Equality and Improving Health and Wellbeing

We are supportive of the London Borough of Enfield's approach to creating healthier places and reducing inequalities, including the protection and enhancement of social and community infrastructure across the Borough in the Local Plan period and beyond.

Blue and Green Enfield

Generally supportive of the comprehensive approach taken in this chapter, however we would recommend that specific and separate policies are developed detailing how development proposals will contribute to the protection and enhancement of the Epping Forest Special Area of Conservation and the Lee Valley Regional Park. We would also recommend early engagement with Natural England and the City of London (Conservators of Epping Forest) as the plan progresses through to Regulation 19 Stage. The London Borough of Waltham Forest is committed to supporting the London Borough of Enfield in developing these policies to ensure that a consistent approach is delivered in each Local Plan to mitigate the in-combination effects of air quality and recreational pressures.

Through continuing to strengthen links between our neighbouring boroughs, we see a partnership approach has the potential to include creating improved blue and green public open spaces including reservoirs, river walkways and greenways along the Lea Valley.

The Lea Valley is a significant landscape which runs and weaves down the Waltham Forest and the Enfield borough boundary - with the expansive space of the reservoirs and marshes including the unique assets of Banbury and St William Reservoirs and north-south watercourses. Cross-valley foot-and cycle-routes could transform east-west connectivity and access. These links could widen the catchment of the valley landscape and form a connected network of open spaces with potential for re-wilding or the provision of SANGS.

Design and Character

We are supportive of the approach taken to secure high-quality and well-designed development in the borough in the plan period in line with the NPPF. We are pleased to see that a thorough approach has been taken to the strategy surrounding taller buildings and the addition of the London Plan definition provides clarity on this matter. We are also pleased to see clear policy setting our amenity space for new development.

Homes for All

The London Borough of Waltham Forest is supportive of the London Borough of Enfield's strategy for delivering housing across its Local Plan period on the sites allocated in the Local Plan and look forward to working collaboratively on schemes that come forward on sites on and surrounding the boundary between the two boroughs. We are also delighted that the Council has decided to maximise the delivery of affordable housing in the plan period, aiming to secure 50% of all new homes delivered as being genuinely affordable.

Economy

We are generally supportive of the approach that the London Borough of Enfield has taken to ensure the adequate provision of jobs and employment floorspace across the local plan period. It would be particularly useful to improve Figure 6.4: Managing the future of Enfield's industrial areas, so that it is clear where substitution and consolidation are

proposed. We are especially pleased to see that the ongoing Covid-19 pandemic has been referenced in the supporting text to clarify the councils position taken on its evidence base data used to develop this part of the strategy.

Town Centres and High Streets

We are generally supportive of the approach that the London Borough of Enfield has taken to developing its Town Centres and High Streets in the Local Plan Period and beyond.

Rural Enfield

We note the approach taken to support the rural parts of the London Borough of Enfield and are supportive of the proposed improvements to accessing the countryside and green corridors in Policy RE2 and RE4 to support Farm Diversification and Rural Employment which is important to the prosperity of the borough throughout the Local Plan period and beyond.

Culture Leisure and Recreation

We are supportive of the approach taken for the development of culture, leisure and recreational development in the borough in the plan period and will continue to work collaboratively with the London Borough of Enfield to assist the realisation of aspirations in and around the borough boundary.

Movement and Connectivity

The London Borough of Waltham Forest are highly supportive of the aims of the Movement and Connectivity Chapter and are delighted to see reference to the aim of achieving an 80% mode share towards sustainable travel including walking, cycling and public transport use by 204. We are also pleased to see reference to car free development in the period too which will help to progress the modal shift in the Local Plan period and beyond.

We believe that our partnership approach will improve east-west cross borough connectivity to existing and emerging assets. This has the potential to support existing and emerging communities, connect open spaces, accelerate the delivery of new homes, employment floor space, workspace and jobs, promote active travel and reduction of car use;

Environmental Protection

We agree and are highly supportive of the emerging strategy for protecting the borough's environment in the Local Plan period and beyond.

Delivering and Monitoring

We are supportive of the ways in which the delivery of the Local Plan will be monitored.

Conclusion

Overall, the London Borough of Waltham Forest would like to commend the London Borough of Enfield for producing such a comprehensive and detailed document at Regulation 18 Draft stage, which will set the borough on a course of good growth in the prescribed Local Plan period. The London Borough of Waltham Forest is committed to supporting and assisting the London Borough of Enfield in the delivery of its aspirations as a competent Local Planning Authority and under the Duty-to-Cooperate and other cross-boundary strategic matters as they arise.

In order to ensure that subsequent stages of the Local Plan preparation are smooth, we would advise that Natural England and the City of London (Conservators of Epping Forest) are thoroughly and comprehensively engaged with every step of the process, in the policies relating to the Epping Forest SAC the Lee Valley Regional Park. We would also recommend (if not done already) early engagement with Natural England.

We would like to take this opportunity to wish our colleagues at the London Borough of Enfield all the very best for their forthcoming pre-submission version of this document and their examination. We look forward to continuing to develop a cross borough strategic partnership approach in the coming months and years.

Yours faithfully