

GREATER LONDON AUTHORITY

Enfield Council
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Department: Planning
Our reference: LDF10/LDD16/LP02/HA01
Date: 13 September 2021

**Statement of general conformity with the London Plan (Planning and Compulsory Purchase Act 2004, Section 24(4)(a) (as amended));
Greater London Authority Acts 1999 and 2007;
Town and Country Planning (Local Development) (England) Regulations 2012**

RE: Consultation on the draft Enfield Local Plan: 2019-2039

Thank you for consulting the Mayor of London on the proposed Regulation 18 2 version draft Enfield Local Plan. As you are aware, all Development Plan Documents in London must be in general conformity with the London Plan under section 24 (1)(b) of the Planning and Compulsory Purchase Act 2004. The Mayor has afforded me delegated authority to make detailed comments which are set out below. Transport for London (TfL) have also provided comments, which I endorse, and which are attached at Annex 1.

The Mayor provided comments on the earlier Enfield New Local Plan 2036 – Issues and Options consultation on 28 February 2019 (Ref: LDF10/LDD16/CG01). This letter follows on from that earlier advice and sets out where you should make further amendments so that the draft Plan is consistent with the London Plan 2021 (LP2021). The London Plan 2021 was formally published on the 2 March 2021, and now forms part of Enfield’s Development Plan and contains the most up-to-date policies.

General

The draft Plan is well laid out and structured and Chapter 2 offers an excellent contextual description of the borough which provides the background for the draft Plan. The borough has a long list of clear objectives set out in Table 2.1 that number 20 in total and which align well with many of the Mayor’s Good Growth objectives, including GG1, building strong and inclusive communities, and GG3, creating a healthy city.

Enfield's proposed spatial strategy is set out early on, making it clear the ambition to deliver at least 25,000 new homes up to 2039, and to focus these in placemaking areas; two proposed large sites are located in the borough's Green Belt at Crews Hill and Chase Park.

Other areas where growth will be focused include Enfield Town, Edmonton Green, Southgate, New Southgate and Angel Edmonton. In total, the draft Plan identifies ten placemaking areas.

Employment needs are expected to be met through the intensification of existing industrial areas and through the provision of new industrial sites in Green Belt areas. The draft Plan proposes five new industrial sites in the Green Belt.

The strategic approach set out in this version of Enfield's draft Plan would result in a total loss of approximately just over 186ha of Green Belt land over the life of the draft Plan.

The Mayor acknowledges the level of ambition shown by Enfield through this draft Plan, the evidence that underpins it and the commitment of the borough to meeting the challenges of housing need and increasing housing delivery and supporting its businesses over the lifetime of the Plan.

However, at this stage the Mayor still has significant concerns as to whether the approach is the right one.

In particular, there appears to be sufficient capacity to meet the required housing target for *this* local plan without Green Belt sites. Moreover, bringing forward Green Belt sites at this stage, alongside non-Green Belt brownfield sites, risks undermining brownfield delivery and viability, particularly in the first 10-year period. Housing development on Green Belt land is very often not fraught with the complexities of delivering housing on previously developed land and can offer much greater financial rewards. There is no 'brownfield first' approach to mitigate this potential risk and we are concerned that in this context, market responses may not align with the borough's stated aims - with potentially significant impacts on brownfield sites and sustainable development. The overall approach therefore seems premature in this context.

Policy G2 of the LP2021 makes it clear that exceptional circumstances are required to justify the de-designation of the Green Belt through the preparation or review of a Local Plan. This approach reflects the one set out in paragraph 140 of the National Planning Policy Framework (NPPF).

Having considered Enfield's draft Plan and the evidence to support the preferred approach it is the Mayor's opinion that the exceptional circumstances¹ that are

¹ Paragraph 140 of the National Planning Policy Framework (NPPF)

required to justify the release of Green Belt land through the Local Plan process have not been established.

The housing crisis is not a challenge faced by Enfield alone, but by all London boroughs. The Mayor would only be able to support Enfield's proposed approach to housing and industrial capacity delivery where it would not conflict with other policies in the London Plan, including those for the continued protection of the Green Belt as set out in Policy G2 of the LP2021. The challenge to deliver much needed housing in London is recognised by the Mayor and is the reason behind the publication of London Plan guidance² which will help boroughs facilitate growth. Alongside this, GLA officers are keen to offer their continued support to Enfield to consider alternative approaches to meeting housing and industrial need in the borough's previously developed, brownfield areas for the duration of the Plan.

It is important to note that the London Plan is clear in paragraph 0.0.22 that it does not meet all of London's identified development needs and that further work will be required to explore the potential options for meeting this need sustainably in London and beyond. However, this is a matter for a future London Plan and will require close collaboration with local and strategic authorities and a clear commitment from the Government.

In light of this, and the fact that the draft Plan demonstrates that it has a land supply to meet almost all of its growth needs, it is considered that the intention to release Green Belt land is premature.

We also have some concerns about the suitability of the proposed locations in terms of their sustainability, particularly relating to transport and also the level of harm identified. Were Enfield able to demonstrate very clearly the exceptional circumstances required to release Green Belt land, in accordance with national and regional policy, then key issues would remain to be addressed. The chosen areas offer very low public transport accessibility and are not within, what is considered to be, a reasonable walking distance to the nearest town centre. The Enfield Green Belt and Metropolitan Open Land Study³ illustrates that many areas proposed for release would cause very high levels of harm to the Green Belt (Figure 1.6). In addition, low density family housing is proposed in these locations which would not make a significant contribution in meeting the borough's housing needs for this Plan period and beyond. For this reason, it is the Mayor's opinion that the benefits do not clearly outweigh the harm that would result from the proposed release of the Green Belt.

² <https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance-and-spgs>

³ <https://new.enfield.gov.uk/services/planning/green-belt-and-mol-assessment-final-report-luc-2021-planning.pdf>

Housing

Enfield set out clearly the intention to deliver 25,000 new homes over the course of the draft Plan up to 2039. This is the medium scenario of three potential growth options, the other two being for the delivery of either 17,000 or 55,000 new homes.

Policy H1 of the draft Plan sets out clearly the intention to provide for at least 24,920 new homes up to 2039. Enfield's housing target, which is set out in Table 4.1 of the LP201 is for the delivery of 1,264 new homes a year and Enfield's proposed housing target is based on rolling this figure forward over 20 years from 2019 up to 2039. This approach is not aligned with the approach in the LP2021, in which paragraph 4.1.11 sets out that beyond 2029 boroughs should base housing targets on the London Strategic Housing and Land Availability Assessment (SHLAA) 2017 sites, any local evidence of identified capacity and should roll forward the housing capacity assumptions applied in the London Plan for small sites. Enfield have identified further potential sites through their own borough-wide SHLAA published in 2020 and through conducting, a more recent, Housing and Employment Land Availability Assessment (HELAA) in 2021. Sites identified as sources of housing supply from this evidence could be used to arrive at a realistic housing target based on capacity beyond 2029. Enfield are urged to follow this advice.

The Plan period, as set out in the draft Plan is from 2019 to 2039. However, paragraph 15.4.1 of the draft Plan makes it clear that the Plan period covers 15 years from 2024 until 2039. This is confusing, and it isn't clear what the phasing years are for the site allocations (i.e. Is year one, 2019 or 2024 in the phasing assumptions set out in the site allocations?). Clarity on this issue would be useful.

The London Plan takes into account the backlog of unmet housing delivery in London from previous years and this is reflected in the housing targets for all London boroughs. Where there has been under-delivery in terms of meeting housing targets, Enfield should therefore only include any shortfall arising from 2019 (the start of the London Plan housing target⁴) onwards and should not try to make up the backlog of unmet delivery from before that time.

Paragraph 68 of the National Planning Policy Framework (NPPF) is clear that authorities should only identify deliverable and developable sites for housing between years 0-10 of a Plan. Sites should be identified beyond year ten of the plan only where this is possible. It isn't essential that Enfield identify sites for housing delivery beyond year 10 of the Plan. Projecting housing delivery so far ahead into the future can become difficult and unrealistic, particularly as all London's housing needs are met by recycling brownfield land.

Policy H4 of the draft Plan reflects the borough's small sites target for the delivery of 353 new homes a year as set out in Table 4.2 of the LP2021 and the commitment to support delivery of this type of housing is welcome. Also welcome is the proposal to provide further guidance in order to facilitate small site development. Enfield should note that the Mayor has published draft guidance which should be used, at least in

⁴ Set out clearly in Table 4.1 of the London Plan 2021

the meantime, to help facilitate the delivery and optimisation of small sites⁵ across the borough.

The small sites target in Table 4.2 of the LP2021 is a minimum and opportunities to exceed the target should be explored as an additional source of housing supply. As mentioned earlier, where borough's like Enfield, require a housing target beyond 2029, the small sites target should be rolled forward and included as a part of it. It doesn't appear that Enfield have considered this approach, nor has it been factored-in fully in terms of housing delivery⁶. While we recognise that Enfield propose to do more in order to facilitate small site housing delivery, more could be done now, as part of the Local Plan. As set out clearly in paragraph 4.1.8 of the LP2021, boroughs should identify as many sites, including small sites, as possible via their Development Plan Documents. Only four small sites have been identified as proposed site allocations and would only contribute 195 new homes over the Plan period.

Boroughs are supported in using windfall assumptions in their five-year housing trajectories based on the small sites targets. Paragraph 4.2.3 of the LP2021 is clear that the small sites target can be taken to amount to a reliable source of windfall sites which contributes to anticipated supply and Enfield is advised to follow this guidance. Therefore, Enfield could be more proactive by identifying more small sites as part of their site allocations and by following the approach set out in the draft Good Quality Homes for All Londoners Guidance to facilitate, identify and optimise development potential from the borough's reservoir of small sites.

Taking the first five years of projected housing delivery from the proposed site allocations, Enfield could deliver 2,121⁷ new homes and if the windfall assumption based on the borough's small sites target is added this would result in the supply of 3,886 new homes. For the following five years (i.e. years 6-10) the site allocations could deliver 11,088 new homes⁸. In the first five years of the Plan, Enfield would not be able to meet their housing target, but from year 6-10 the housing target would be exceeded. Over the 10-year period, on average, Enfield has capacity to deliver 1,497 new homes a year. This level of supply exceeds the borough's housing target (1,246 homes a year) by approximately 20% (taken as an average over 10 years). Any shortfall in housing delivery in earlier years (i.e. from 2021) should be relatively small and could be met by bringing forward development earlier on from later Plan period sites (from beyond year 10) and/or by identifying further small and other sites.

As the majority of housing capacity from the proposed site allocations is skewed towards the middle of the Plan period (i.e. years 6-10), Enfield could consider adopting a stepped housing target which would take account of the expected low

⁵ <https://consult.london.gov.uk/good-quality-homes-for-all-londoners>

⁶ In Enfield's Housing Topic Paper it appears that windfall supply is taken as 110 new homes a year. Paragraph 4.2.3 of the LP2021 makes it clear that the small sites target can be taken as a reliable source of windfall sites.

⁷ Assuming housing delivery at Meridian Water is spread evenly across the plan i.e. 1667 new homes for years 0-5, 6-10 and beyond 10 years

⁸ Including the small sites target but excluding the four small site allocations to deliver 195 new homes

delivery of housing in the first five years of the Plan and could help in terms of navigating the government's housing delivery test. The LP2021 at paragraph 4.1.10 supports a stepped housing target approach and is something Enfield is advised to consider.

The draft Plan makes it clear that 16% of planning applications for housing lapse and this could lead to a requirement to find even more sites for housing. If Enfield wish to find more housing to account for the lapses in permission, they could attempt to resolve this by exploring ways to bring forward development on sites identified for the latter part of the Plan period (i.e. sites delivering housing beyond year 10 of the Plan). The GLA are interested to learn how Enfield has engaged with landowners and stakeholders directly, to not only catalyse earlier development on sites, but to also identify new sources of housing supply, including the currently untapped potential from small sites. If they haven't already done so, Enfield may wish to investigate the lapses in planning applications further by contacting landowners and their agents to gain a deeper understanding of the mechanisms at play and underlying reasons.

Enfield's site capacity calculations to deliver housing appear to be based on algorithms and various broad assumptions. Enfield are advised to take a more site-specific and design-led approach, to more realistically understand the capacity of sites to accommodate housing in accordance with Policy D3 of the London Plan and by following the guidance set out in the draft Good Quality Homes for All Londoners Guidance.

It is understood that Enfield have not met housing targets in recent years and it would be useful to understand the options available that could help the borough to achieve its housing targets. It appears that Enfield could come close to meeting their housing requirements without relying on Green Belt sites as a source of housing supply. It is noted that in the first five years of the Plan, delivery would fall very short of the borough's targets and in order to address this situation and increase overall delivery Enfield could:

- Try to bring forward earlier delivery of housing from sites identified for the latter years of the Plan;
- Consider adopting a stepped housing target to account for the proposed low housing delivery projected for the first five years of the Plan (an approach supported through the LP2021);
- Employ a design-led approach to realistically optimise the delivery of housing as part of the proposed site allocations and in assessing unplanned windfall planning applications for new homes. This will ensure Enfield understand the capacity of identified sites and it will also guide development proposals resulting in optimal housing delivery;
- Explore more opportunities to bring forward and catalyse housing development on small sites and follow London Plan guidance;
- Identify difficult sites where there are obstacles to development and explore ways in which interventions may allow development to come forward on

those sites (these types of site may have been ruled out early in site assessments), and

- engage with landowners to bring forward new sites for housing (as a large number of sites appear to have been ruled-out very early on in the Enfield HELAA 2021)

Affordable housing

Policy SP H2 reflects the Mayor's strategic target that 50% of all new homes should be affordable and based on gross residential development as set out in Policy H4 of the LP2021 and this is welcome. Part 3 of Policy H2 should make it clear that the Mayor's affordable housing thresholds are not targets but are the level of proposed affordable housing beyond which viability assessments are no longer required as part of planning applications; the Fast Track Route (FTR). Conversely, where planning proposals do not meet or exceed the affordable housing thresholds they will be required to take the Viability Tested Route (VTR) and will need to provide viability assessments as part of planning applications and will be subjected to viability reviews in accordance with Policy H5 of the LP2021. As currently drafted the thresholds appear to be targets and should be amended accordingly to ensure it is consistent with the LP2021.

Enfield should consider how the plan reflects part C4 of Policy H5 of the LP2021, which makes it clear that boroughs should demonstrate that they have taken account of the 50% affordable housing target by seeking grant to increase the level of affordable housing beyond the thresholds.

Part 3a of the Policy which seeks 50% affordable housing from estate regeneration is not consistent with Policy H8 of the London Plan. Policy H8 and paragraph 4.8.5 of the LP2021 make it clear that where estate regeneration involves the loss and replacement of affordable housing, it should deliver an uplift in affordable housing wherever possible. These types of estate regeneration schemes must go through the VTR to demonstrate that they have maximised the delivery of any additional affordable housing. Enfield should follow the guidance set out in Policy H8 of the LP2021 and associated supporting text.

Part 7 of Policy H2 of the draft Plan is not consistent with Policy H5 of the LP2021 as it sets out that regard will be given to the economics and financial viability of the development when determining the requirement for affordable housing. Where residential proposals meet or exceed the thresholds in Policy H5 of the LP2021 they will not be required to provide viability evidence and will be subject to the FTR. Only those proposals that cannot meet the threshold levels will be required to take the VTR to submit viability information and will be subjected to review mechanisms in accordance with Policy H5 of the LP2021. Part 7 should be removed or amended accordingly to make it consistent with the LP2021.

Enfield propose a tenure mix of 50% social and affordable rented housing and 50% intermediate housing. This is consistent with the approach set out in Policy H6 of the LP2021 in that at least 30% should be for low-cost rented homes and at least 30% should be for intermediate products, with the remaining 40% to be determined by

boroughs. Enfield should ensure that the proposed 50/50 split is based on local evidence. The LP2021 at paragraph 4.6.2 makes it clear that there should be a presumption that the 40% to be determined by the borough will focus on Social Rent and London Affordable Rent, given the level of need for this tenure across London. Of particular relevance, is Enfield's Strategic Housing Market Assessment (2015) (Enfield's most recent assessment) which recommends that the borough's tenure split should be set at 70% for social and affordable rent and 30% intermediate housing. Part 4 of Policy H2 suggests that there may be flexibility in applying the required tenure split to applications subject to viability. It should be noted that where proposals diverge from the required tenure split, they will be required to take the VTR in accordance with Part B of Policy H6 of the LP2021. In these cases, proposals will be subjected to viability review mechanisms.

It should be noted and reflected in the draft Plan that where off-site or cash-in-lieu payments are considered as an acceptable alternative to on-site affordable housing, such schemes will be required to follow the VTR and will also be subjected to early and late stage review mechanisms in accordance with paragraph 4.5.15 of the LP2021. It should also be noted that in these circumstances the affordable housing level is set at 50% provided across the main site and any linked sites when considered as a whole in line with paragraph 4.4.13 of the LP2021.

Tall buildings

It is both noted and welcomed that the draft Plan subscribes to the same definition of what constitutes a tall building as that in the LP2021. Also welcome is the identification of individual sites suitable for tall buildings on maps and included are associated appropriate/maximum building heights.

The approach is very site-specific and while generally acceptable, as it is consistent with Policy D9 of the LP2021, the identification of broader areas or 'tall building zones' would be preferable, where there would be certainty that within those areas tall buildings would generally be acceptable and outside of those areas they would not. The building heights identified in Figure 7.3 of the draft Plan should be carried through to be reflected clearly in the site allocations.

Industrial land

It is noted that Enfield has spent considerable time and effort in producing a substantial amount of evidence to underpin their strategic approach towards the management of their industrial land over the Plan period.

The evidence clearly establishes a need for an additional 56ha of industrial land over the Plan period. This figure is considered to be acceptable and is comparable with LP2021 evidence which identified a need for 52ha up to 2041.

Enfield's Industrial Intensification Study (2020)⁹ illustrates that through a range of industrial intensification typologies, the borough could meet its industrial land needs over the Plan period. However, further work to test the viability of the potential industrial intensification¹⁰ rules out 4 of the 7 proposed typologies. It also recognises positively, that for the other 3 typologies there is a growing likelihood that viability will improve in time. The report at paragraph 4.4.18 states:

'... in the medium term, given the likelihood of a strengthening logistics market post Covid 19 it may be pragmatic to start to rely on intensification in the middle of the plan period. At the moment this supply remains 'aspirational' but there is a suite of evidence and opinion showing this is likely to change. If the market does strengthen, and applications / pre-applications for intensified formats appear then this is evidence to reconsider counting this space.'

The study does not look at other models of industrial capacity delivery including when combined with other non-industrial uses, such as with residential, for example. This could yield more viable typologies for intensification or lead to new sources of potential industrial capacity supply, such as within the borough's existing retail parks. It is considered that there is further scope for exploring more potential sources of supply and the realistic ability of previously developed land to meet those needs has not yet been exhausted.

The industrial intensification viability report also goes on to conclude that intensification is not the only source of potential industrial supply and that the borough will have surplus retail provision post-Covid which should also be explored as a potential source of industrial supply going forward. Only one retail park has been identified in the site allocations as suitable for industrial development (SA47). Industrial development capacity assumptions for that site appear to be based on single storey development and not on multi-storey development as set out in the site allocation.

It should also be taken into consideration, that if Green Belt sites are to be released for industrial use, then proposed industrial intensification on existing brownfield sites may remain unviable in the longer term. Which would not be in line with the national test for the purposes of the Green Belt set out in paragraph 138 of the National Planning Policy Framework.

We propose that Enfield take a more optimistic and pragmatic approach, understanding that viability for industrial intensification will become more attractive from the middle of the Plan period. Therefore, we suggest that Enfield employ a plan, monitor and manage approach as set out in Part C of Policy E4 of the LP2021. Brownfield sites should be allocated accordingly and earmarked for the three viable

⁹ <https://new.enfield.gov.uk/services/planning/aecom-final-draft-enfield-industrial-intensification-report-2020-planning.pdf>

¹⁰ <https://new.enfield.gov.uk/services/planning/enfield-industrial-intensification-final-2020-planning.pdf>

industrial intensification typologies but phased from the middle of the Plan period, onwards.

Local Plan evidence from the two previously cited pieces of Local Plan evidence both indicate that Meridian Water, East Bank (Harbet Road) (Sites ST77 and ST92 in the studies) offer the greatest potential for industrial intensification. In fact, this area alone offers 67.4% of the borough's total industrial intensification potential. These sites have not been allocated for the intensification of industrial uses in the draft Plan. The Enfield Employment Topic Paper (June 2021)¹¹ at paragraph 3.35 makes it clear that there is no prospect of the landowners of these sites implementing the recommendations of the evidence work and the sites have therefore been left out. Inclusion of these sites alone would account for much of Enfield's industrial land needs over the course of the Plan and it is the Mayor's opinion that their inclusion for industrial intensification should be reconsidered.

Transport

The aspiration of the draft local plan to support growth and enable people to get around by walking, cycling, and public transport is welcomed. In particular, the approach set out in the draft local plan to further reduce car use in line with the Mayor's targets for 2041 and to implement the Healthy Streets Approach.

There are concerns about the lack of detail on some strategic transport issues. There is a need to confirm that London Plan maximum standards for car parking and minimum standards for cycle parking will be applied (or an even more ambitious approach if desired). Clarification is also required on whether projects such as east-west transit are still being promoted and if so, how they will be delivered. Transport for London (TfL) previously expressed concerns about viability and a lack of commitment and funding, particularly in the current climate.

The Mayor has major concerns about some of the growth areas identified in rural parts of the borough which are less well connected by public transport and would require both substantial investment in transport infrastructure and services, and a restrictive approach to car parking in order to achieve the objectives of Good Growth. The high level of investment in active travel and public transport which would be required may not be realistic or viable in the long-term. There is a real risk that these areas could: become car dependent, have poor access to key services and put further pressure on the road network. We understand that further assessment work is underway, but as the situation currently stands, we would be likely to object on strategic transport grounds to the proposed growth areas at Crews Hill and Chase Park, as well as the employment site at land east of junction 24.

London's National Park City Status

In 2019, the National Park City Foundation confirmed London as the world's first National Park City which places even greater emphasis and importance on the

¹¹ <https://new.enfield.gov.uk/services/planning/enfield-employment-topic-paper-2021-planning.pdf>

Capital's green spaces and the protection that the Mayor provides, through the London Plan, for the Green Belt and Metropolitan Open Land.

The Mayor welcomes Enfield's recognition and reflection of London's National Park City status through Policy PL8 of the draft Plan. This policy makes a commitment to re-wild 1,000ha of proposed woodland and open space, implement flood risk mitigation, create new or improved walking and cycling routes and provide much needed burial space among others. The Mayor is supportive of Policy PL8 in the draft Plan but it is difficult to reconcile how Enfield can support London's National Park City status while simultaneously proposing the potential loss of approximately 186ha of Green Belt land.

Sustainable Enfield

The Mayor welcomes the draft Plan's focus on sustainability and the borough's ambitions to become carbon neutral by 2040.

The intention that circular economy principles are embedded into design and construction phases of development as set out in Policy SE1 of the draft Plan is noted. Policy DM SE3 which requires circular economy statements for all major development proposals is particularly welcome and supported as it exceeds the Mayor's requirement for circular economy statements for all referable planning applications as set out in Policy SI 7 of the LP2021. While the Mayor is supportive of Enfield's drive for sustainable development, Policy DF1 of the LP2021 should also be considered which makes it clear that where planning obligations cannot viably be supported by a specific development, priority should firstly be given to affordable housing and necessary public transport improvements.

Next steps

I hope these comments positively inform the preparation of Enfield's Local Plan and we continue to offer our support to continue working with you to address the issues identified in this letter and to ensure it aligns with the LP2021 as well as delivering the Council's objectives. If you have any specific questions regarding the comments in this letter, please do not hesitate to contact Hassan Ahmed on 020 7983 4000 or at hassan.ahmed@london.gov.uk.

Yours sincerely



Annex 1 – Transport for London Comments

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London E20 1JN

Phone 020 7222 5600
www.tfl.gov.uk

6 September 2021

Dear Sir/Madam,

RE: Enfield Reg. 18 Local Plan – TfL comments

Please note that these comments represent the views of Transport for London (TfL) officers and are made entirely on a 'without prejudice' basis. They should not be taken to represent an indication of any subsequent Mayoral decision in relation to this matter. The comments are made from TfL's role as a transport operator and highway authority in the area. These comments also do not necessarily represent the views of the Greater London Authority (GLA). A separate response has been prepared by TfL Commercial Development to reflect TfL's interests as a landowner and potential developer.

Thank you for giving Transport for London (TfL) the opportunity to comment on Enfield's draft local plan. As you are aware, the London Plan 2021 has recently been published and now forms part of Enfield's development plan. As such, we will use it as the basis for comments on the draft Local Plan.

We welcome the aspiration of the draft local plan to support growth and enable people to get around by walking, cycling, and public transport. In particular, we welcome the approach set out in the draft local plan to further reduce car use in line with the Mayor's targets for 2041 and to implement the Healthy Streets Approach.

However, we have concerns about the lack of detail on some strategic transport issues. There is a need to confirm that London Plan maximum standards for car parking and minimum standards for cycle parking will be applied (or an even more ambitious approach if desired). Clarification is also required on whether projects such as east-west transit are still being promoted and if so, how they will be delivered. We previously expressed concerns about viability and a lack of commitment and funding, particularly in the current climate.

We also have major concerns about some of the growth areas identified in rural parts of the borough which are less well connected by public transport and would require

both substantial investment in transport infrastructure and services, and a restrictive approach to car parking in order to achieve the objectives of Good Growth. The high level of investment in active travel and public transport which would be required may not be realistic or viable in the long-term. There is a real risk that these areas could: become car dependent, have poor access to key services and put further pressure on the road network. We understand that further assessment work is underway, but as they currently stand, we would be likely to object on strategic transport grounds to proposed growth areas at Crews Hill and Chase Park, as well as the employment site at land east of junction 24.

Our responses to specific points in the draft Local Plan are set out in more detail in the attached appendix. We look forward to continuing to work together in drafting the final document and are committed to continuing to work closely with the GLA to deliver integrated planning and make the case for continued investment in transport capacity and connectivity to enable Good Growth in Enfield and across London.

Yours faithfully,



Josephine Vos | Manager

London Plan and Planning Obligations team | City Planning

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Appendix: Specific suggested edits and comments from TfL on the Enfield Reg. 18 draft local plan

Section	Track change/comment
2.1.3	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.
SP PL2 Southbury	We welcome the requirement that development proposals will need to ‘demonstrate how they will improve the pedestrian environment along the A10 through provision of a green buffer and facilitate delivery of a new cycle lane in both directions of the A10 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.
SP PL3 Edmonton Green	We welcome the requirement that ‘Proposals will be expected to contribute to enhancing the public realm to make walking and 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.

Section	Track change/comment
Angel Edmonton Placemaking Vision	Reference is made here to new rapid transport and green active travel corridors linking the new neighbourhood at Meridian Water to 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 aspirations and are more realistic within the Local Plan timescales.
SP PL4 Angel Edmonton	We welcome parts 7 – 11 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 11) should be the subject of early discussion with TfL to establish feasibility and likely costs.
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.
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 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.
SP PL7 New Southgate	We welcome parts 4 and 7 which require contributions towards improved active travel, links to stations and the public realm.

Section	Track change/comment
<p>SP PL9 Crews Hill</p>	<p>The proposed placemaking area immediately around Crews Hill station has a Public Transport Access Level ranging from only 1a to 1b (on a scale of 1a – 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>There are no proposed transport projects to improve access or capacity either in this policy or in policy T1. 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 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. 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 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>SP PL10 Chase Park</p>	<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 1a to 1b 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>

Section	Track change/comment
	<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 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 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 investment. As it stands, TfL would be likely to raise strong objections to this policy on strategic transport grounds.</p>
<p>SP SC1 Improving health and wellbeing of Enfield’s diverse communities</p>	<p>We welcome reference in part 1a to contributions to the provision of access to sustainable modes of travel, including safe cycling routes, attractive walking route and easy access to public transport to reduce car dependency. However, it would be helpful to confirm support for the Healthy Streets Approach to ensure consistency with other sections of the Local Plan.</p>

Section	Track change/comment
SP BG1 Enfield's Blue and Green Infrastructure Network	We welcome proposals for public realm improvements along main routes (e.g. A10, A406 and A101) and at key stations and town centre gateways and for new crossings/bridges over the A10, A406 and Lee Valley line to 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.
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.
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.
SP E1 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 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.

Section	Track change/comment
	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. Table 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.
SP E3 Protecting employment locations and managing change	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.
SP TC1 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.
10.5.3	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.
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, 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'.
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 included solely in explanatory text.

Section	Track change/comment
<p>SP T1 Promoting sustainable transport</p>	<p>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 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.</p> <p>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 times and reliability at a much lower cost than a full-scale transit project.</p> <p>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.</p> <p>The current status of the Crossrail 2 project and any updates on safeguarding are available on the Crossrail 2 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.</p>

Section	Track change/comment
	https://crossrail2.co.uk/news/crossrail2-update-november-2020/
DM T2 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 1c 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 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 1e 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.
SP D1 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.
SA13 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.
SA27 Land at Crews Hill	See comments above under SP PL9 which are relevant to this site allocation.
SA28	See comments above under SP PL10 which are relevant to this site allocation.

Section	Track change/comment
Land at Chase Park	
SA54 Land east of junction 24	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.
SA62 Land at Tottenham Hotspur FC training ground	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.

