

Date: 28 February 2019

Our ref: 16500/01/NT/CCK/17168817v5

Your ref:

Dear Sir/Madam

Enfield Local Plan 2036 – Issues and Options (Regulation 18) Consultation

On behalf of our client, The Wave (London), we set out below representations to the Enfield Local Plan 2036 Issues and Options consultation, issued for comment until 28 February 2019 ('the consultation document').

The Wave is an inland surf destination that allows people to surf on consistent safe waves all year round, providing naturally healthy spaces where people of all ages, abilities and backgrounds, can improve their health and wellbeing. Currently in construction on a Green Belt site in Bristol (due to open in Autumn 2019), The Wave is now working with the Lee Valley Regional Park Authority to develop a proposal for a world-class surfing destination at the Lee Valley Leisure Complex in Edmonton, North London, reinvigorating and enhancing circa 100 acres of land within the Regional Park. The Wave London could offer a new purpose-built surfing lake and feature other elements such as a high-performance surfing and skateboarding centre, health and rehabilitation, cycle trails, high ropes, and overnight accommodation. There would also be opportunities to work with local schools and groups to offer therapeutic and educational programmes, and in addition provide access to the lake for marginalised groups in the borough.

Our review of the consultation document therefore focuses on the planning policy issues relevant to support the delivery of this exciting development for the London Borough of Enfield.

1. Growth Objectives

The inclusion of the Council's growth objectives within the consultation document is supported, setting out a series of objectives for the new Local Plan to achieve its vision. The Wave, however, considers that the visitor economy and wider tourism sector should be fully recognised within Objective 1 (Promoting and managing growth). Tourism/leisure is a significant contributor to the future growth of Enfield's economy (as well as the wider London region). This would lend further support to the recognised need in the consultation document for Enfield to increase leisure and social activities (para 1.11-challenges facing Enfield).

The Lee Valley Regional Park is already an important and established part of London's leisure and tourism provision. The Wave will help raise its profile and reinforce this role.

Such an approach would reflect national policy as set out in the National Planning Policy Framework (NPPF, 2019) (Section 6, Paragraph 83) which supports the sustainable growth of the leisure and tourism industry.

The London Plan (2016) and Draft New London Plan (2018) encourages Boroughs to support and stimulate growth in the visitor economy and the seeks to promote tourism across the whole of the city, including outside central London. We therefore consider it crucial that the Local Plan recognises the importance of this sector to the economy and provides the necessary policy support.

2. Opportunity Areas

The Wave supports the inclusion of the Upper Lee Valley as an Opportunity Area. The Lee Valley represents one of London's major growth corridors (as designated in the London Plan). However, the relevant text (Para. 2.14.2- 2.14.3) does not confirm the overall importance of the Opportunity Area. The consultation document should acknowledge the significant contribution made by the existing sport, leisure and recreation attractions within the Upper Lee Valley Opportunity area (specifically at Picketts Lock), noting the significance of the leisure and tourism industry to the economy and the need to support its growth in order to maintain and enhance the Borough's economic profile.

This would align with the GLA's Upper Lee Valley Opportunity Area Planning Framework (July 2013) which refers to improvements to leisure and sports at Picketts Lock as one of the Upper Lee Valley objectives (Fig 1.3). The consultation document should therefore provide greater emphasis on this purpose of the Opportunity Area, reflecting what is included in the London Plan (2016), Draft New London Plan (2018) and the GLA's adopted planning framework.

3. Approach to Employment Land

The map within this section (Fig 6.4) identifies how the future of Enfield's industrial areas will be managed. This includes potential areas for substitution and consolidation. We consider that further clarification is required in the Local Plan on where these 'substitution and consultation' areas will be located.

Fig 6.4 currently identifies these as a double-headed arrow across an unidentifiable extent of land on a borough-wide map, which is rather ambiguous and difficult to determine. We assume that this does not include the Picketts Lock area (given it is a proposed leisure and recreation destination) however, a detailed plan which clearly demonstrates the 'substitution and consultation' areas would be welcomed to provide the necessary clarification.

4. Draft Policy SI3 (Arts and Cultural Facilities)

Policy SI3 positively supports the enhancement of entertainment, leisure and sport uses. The Council's leisure/tourism offer is included within this policy. However, it is considered that the current policy title does not accurately reflect the overall policy focus. Given the absence of a specific visitor/tourism policy, we consider that the policy title should be amended to reflect this particular focus. In addition, a more flexible approach is required to both sufficiently address and distinguish between both new and existing uses. Our suggested revisions to the policy are set out below (our additions are in **bold** text):

*Draft Policy SI3 (Arts, Cultural, **Leisure and Tourism** Facilities)*

*The Council will support the enhancement of arts, cultural, entertainment, leisure, **tourism**, recreation and sport uses. We will achieve this by:*

*a) Supporting the continued presence of Enfield's arts, culture, entertainment, leisure, recreation and sports venues (**both new and existing**) subject to the local impact of venues being managed without **unacceptable** impact to local residents **by:***

*i) Requiring proposals for new and expanded venues to be accessible and inclusive and to be supported by evidence of how impacts such as noise, traffic, parking and opening hours have been assessed, minimised and mitigated (**where possible**); or*

ii) Seeking retention, replacement or enhancement of existing arts, cultural, entertainment, leisure, recreation and sport uses, unless there is evidence that there is no longer an identified need for a particular facility or alternative arts, cultural, entertainment, leisure, recreation and sport uses. In these circumstances, the Council will require evidence demonstrating that the facility is not economically viable, including evidence of active and appropriate marketing for a continuous period of at least 12 months; and

b) Supporting the temporary use of vacant buildings for community use including for performance and creative work.

5. Draft Policy GI1 (Green and Blue Spaces)

Draft Policy GI1 sets out how the Council will protect, enhance the quality and improve access to open space. In respect of part (c) it is important to correctly consider the purpose of open space. Its specific use may change (for example, from a golf course to an inland surfing lake), but it would remain as open space nonetheless. We have therefore set out our suggested policy amendments below, which would also provide consistency with part (f) of the policy, which supports new high quality outdoor leisure facilities to promote sports and active recreation across the Borough.

c) Protecting all Open Space and Play Space in the borough as identified on the Policies Map. Any development proposals on such space should:

- ***Maintain the purpose of land being identified as open space, even if the specific use of that open space is altered;***
- ***Be supportive of development that is reasonably required to support the function/uses of and within that open space and ancillary to the purpose of that open space (whether in its existing or proposed use); and***
- *Enhance the quality or accessibility of the open space.*

6. Draft Policy GI2 (Green Belt and Metropolitan Open Land)

Policy GI2 sets out the Council's approach to protecting the openness of the Green Belt. We suggest that the policy is revised to read as follows:

*“Supporting development, which **maintains or** improves access to Green Belt areas for beneficial uses such as outdoor sport and recreation, where there is no conflict with protecting the openness of such land **or where very special circumstances are demonstrated**”.*

This ensures consistency with the NPPF as national policy (para. 141) advises that local planning authorities should look for opportunities to positively enhance their beneficial use; such as improving access to the Green Belt. As such, access improvement is not a mandatory requirement. Indeed, a site may already have open access and therefore a development proposal could not further improve on this, but could maintain it.

Policy GI2 also stipulates that a Green Belt boundary review will be undertaken. We would welcome clarification on the timescales for this and whether this review will be published for comment in advance of, and indeed inform, the next draft of the Local Plan.

Major Developed Sites

The supporting text to Policy GI2 has regard to the range of uses undertaken within the Green Belt, referencing Lee Valley Regional Park (LVRP), with its associated waterways and leisure activities. Paragraph 9.3.6 refers to two major developed sites (MDS): Trent Park Campus and the Picketts Lock Leisure Complex. The Wave support the recognition of MDS within the new Local Plan. However, it is important that specific reference to MDS in the Green Belt is included within Draft Policy GI2 or within a bespoke policy relating to the Picketts Lock Leisure Complex. There critically needs to be a distinction between a general brownfield site i.e. Previously Developed Land (PDL), of which there are many in the borough of various scales, and a major PDL site where development exists and where development is going to happen and should be planned for i.e. an MDS (or similar title e.g. “identified PDL”).

This is necessary to support a Plan-led approach which guides and supports development at Picketts Lock with certainty and efficiency, aligning with para. 16 of the NPPF (2019) i.e. *“plans should... contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals”*.

The new Local Plan needs to provide certainty for sites where it is known that development is going to take place, in order to secure the sustainable future of their operations. As such, we consider that for a site where ‘change’ is predicted or desirable, such as Picketts Lock, it ought to be subject to a specific policy rather than a generic policy approach to other previously developed land (PDL) in the Green Belt.

7. Picketts Lock Leisure Complex

We consider a bespoke policy should be developed for the Picketts Lock Leisure Complex as an identified MDS or identified PDL in the Green Belt. This would reflect the site’s importance as a London Plan Opportunity Area, an existing developed site and its identification within Edmonton Leaside Area Action Plan as a destination attraction for Edmonton Leaside and beyond.

This bespoke policy should set out a description of the site and its current use, followed by future aspirations for the site’s development (in accordance with the Area Action Plan and GLA guidance). This policy could also set out the criteria for which development within the MDL would be appropriate.

We would be pleased to meet with the Council to review this approach and ensure the Local Plan is sufficiently flexible but also sufficiently certain to provide the framework required for the sustainable future of the Picketts Lock Leisure Complex, given its importance to the Lee Valley Regional Park Authority’s plans for the Park’s sustainable economic future, and therefore its importance to the Borough.

8. Lee Valley Regional Park

The Lee Valley Regional Park is already an important and established part of the London’s leisure and tourism provision. There is currently no policy which sets out the future vision for development at Lee Valley Regional Park. The Wave therefore consider that Core Policy 35 (Lee Valley Regional Park and Waterways) in the Core Strategy (2010) should be carried forward in the new Local Plan.

Given the size of the public open space and need for the Council to work with other bodies, specifically the Lee Valley Regional Park Authority, we consider that the Core Policy 35 text should be included to realise the potential of this area and support the sustainable growth of the leisure and tourism industry in accordance with the NPPF (2019).

Summary

In summary, The Wave is generally supportive of the preferred approaches set out in the Issues and Options consultation document but considers that Enfield Council should review the approach to PDL and MDS in the Green Belt and include a greater focus on the importance of recreation, leisure and tourism to the Borough to secure the necessary policy support as key developments come forward. As noted, The Wave would be happy to meet with the Council to discuss this in further detail.

We trust the above comments are helpful when developing the Local Plan. If you would like to discuss any element of our client's response please do not hesitate to contact me, Sophie Hitchins or Charlotte Cook.

Yours faithfully