

Date: 13 September 2021
Our ref: 16500/01/NT/2017770v1
Your ref:

Dear Sir/Madam

New Enfield Local Plan - Draft Local Plan

We have been asked by The Wave, London to submit short comments on the draft “*Enfield Local Plan Main Issues and Preferred Approaches (June 2021)*”. We have engaged with the Council on behalf of The Wave London on the Local Plan review, via the representations we made in 2019. These are attached for ease of reference.

Some background to The Wave London, along with the aspirations for developing an exciting and innovative surf lake with supporting facilities at Picketts Lock is set out in the 2019 representations. The project is being promoted in close collaboration with the Lee Valley regional Park Authority (LVRPA).

Since the reps were submitted The Wave Bristol has opened and is proving very popular with a broad audience, including many people taking up surfing as a sport and exercise. There are a wide range of health (both physical and mental), economic and social benefits that are being generated. These will all be explained in detail and related to The Wave London in due course, via the planning application and consultation process that the company is embarking on. Of course COVID 19 has had a significant impact on the timing of the project for the Picketts Lock site but the aim is now to make significant progress and hence the interest in making focused comments on the emerging Local Plan.

Comments on the Local Plan

Good growth in Enfield

The introduction to the plan describes the socio-economic and environmental context of Enfield. There are clearly challenges across the borough and various forms of development/land use will be required to support the residents and meet a variety of needs. The infographic at 2.2 (page 10) summarises the challenges. Without overloading this summary diagram, we suggest that a reference should be made to recreation and health as this is a theme that is clearly of importance in the preceding text. The caption could be “*Support a wide range of sports and recreational developments, especially innovative and regionally important facilities as these will enhance opportunities and health outcomes*”

Strategic Policy PL8 Rural Enfield-a leading destination in London's National Park

This area includes the land at Picketts Lock, of interest to The Wave London. The purpose of the Council identifying 10 placemaking locations is to focus the delivery of the council's spatial strategy and set out the requirements for each area in terms of future development. For the Rural Enfield area, 4 questions are asked:

1. *Do you support the designation of Rural Enfield as a leading transformative destination within the London National Park City?*
2. *Do you feel the policy covers the right area of the Borough? If not what changes would you make?*
3. *Do you feel the policy could be improved*
4. *Do the vision or policy miss any significant matters?*

The draft contains a broad range of ideas and potential projects. This is welcomed. There is reference at 2(f) to "improved hubs of sporting excellence." and the hubs referred to are THFC training ground and Ponders End. We are interpreting the latter to include the Picketts Lock site, that does of course already include a centre of training excellence. If this is correct we endorse the proposal to improve the hubs. If not, the Picketts Lock site should be specifically mentioned.

The policy does refer to the aim "...to transform the arc of open space around the edge of the Borough's urban area as a whole into a world leading outdoor cultural and leisure destination..." (para 3.8.7) and then expresses various predominantly landscape and nature focused goals. The plan should acknowledge that to achieve the overall aim there will be may be some built facilities required that, in the overall context of the extensive open area will be modest, but will be important to support and achieve the overall aim of creating a world leading destination in terms of outdoor cultural and leisure.

Strategic Policy **SP SE1**: Responding to the climate emergency and DM policies

A fundamental aspect of The Wave London will be to take a very responsible approach to design and energy use especially in the main building that will be required to support the overall development. However, the approach to developing buildings in terms of design/construction/operation will need to be treated with a degree of flexibility to ensure that worthwhile projects that may have other important benefits are not undermined by unduly aspirational goals. The local Plan policies need to be in line with the NPPF approach to these matters (chapter 14 in particular).

Bringing surfing to London will have a number of benefits in terms of energy consumption and travel patterns. Also The Wave London will building on the sustainability credentials applied to The Wave Bristol which has already resulted in several regional and national awards for sustainable development.

Creating a biodiverse and green site in appearance and operation is part of the overall plan.

Strategic Policy **SP SC1** Improving health and wellbeing of Enfield's diverse communities.

This policy is broadly welcomed but can be added to by adding that LB Enfield will support proposals that are directly concerned with the provision of sport/leisure and recreation.

Strategic Policy **SP BG1** Enfield's blue and green infrastructure network

The policy notes that one of several blue green interventions that will be prioritised includes 2(j) revitalisation of open spaces and leisure/recreational activities at ...Picketts lock..."

This is supported and agreed that the site can be revitalised and this will include via the introduction of new facilities. As noted in the explanatory paragraphs, the Council will need to work with developers and other partners to deliver the blue/green strategy.

SP BG5 Green belt and edges of the countryside/urban area

The draft policy discusses the approach to sites in the green belt where limited infilling/partial or complete redevelopment might be proposed. It introduces three criteria that such development should achieve including “...not lead to an increase in the developed proportion of the site...” (see BG5 2(b)). This is not consistent with the NPPF (para 149(g)). For example infilling by definition will add to the developed proportion of a site. This criterion should be removed. Also criterion (3) about traffic impacts should be dealt with under other policies related to the assessment of development proposals and not added as a further criterion to this part of policy BG5.

The explanatory notes refer to Picketts Lock as a major developed site (see 6.5.5). However, whilst this is correct, the use of MDS does tend to hark back to former policy guidance eg PPG2 and the NPPF now uses the terminology of Previously Developed Land (pdl). We agree that a boundary to define pdl can be included in a local plan and that one should be defined for the site a Picketts Lock. We comment on this in relation to SA56 (see below). The text refers to showing this on the policies map but we can only see a pdf version of that map and it is not sufficiently clear to check the boundary.

Policy **DM RE1** Character of the green Belt and open countryside.

In terms of part 2 of the draft policy the expectations of development in the GB need to be consistent with the NPPF. As currently worded the expectations appear to go beyond national guidance. The policy could state that the Council will “encourage or support” proposals that achieve/provide etc rather than “expect” For example, if development in the green belt is “appropriate” that may affect open character and that may conflict with 2e. The suggested rewording assists avoid a policy conflict.

Policy **DM CL2** Leisure and tourism

The Wave London welcome this policy including the 1a that notes support in particular for “proposals which promote greater use of the rural parts of Enfield and the Lee Valley as a leisure and recreational resource without harming local biodiversity or water quality.”

SP CL4 Promoting sporting Excellence

The Wave London is focused on sporting excellence as well as providing access for all to experience high quality facilities. The policy is welcomed including the reference at 1b to Picketts Lock.

There is a cross reference to SA 56 which is commented on below.

SP T1 Promoting sustainable transport

The approach to encouraging sustainable travel is supported. However, part 1c of the draft policy expects new developments to be car free. This may be feasible in many locations and forms of development but there may be some locations/activities where car use will be important (especially for example the occasional, family/group trip where vehicle occupancy is high). The policy should allow for projects to be considered on their merits and particular needs whilst noting the overarching objective to be car free.

Appendix C Site Allocation Proformas

Picketts Lock is addressed at “Other Site Allocations” SA56.

Our main observation related to the extent of the red line. It should at the very least include all the previously developed land (based on the definition in the NPPF/glossary to the LBE Local Plan). This would include the caravan park and the athletics track. There is a case for including the overall site. We, along with LVRPA, welcome the opportunity to discuss the appropriate boundary with the Council.

The delivery timescale may also be 0-5 years rather than 5-10.

The proposal for new sports leisure and recreational facilities is supported. However, this can be added to by referring to accommodation as well (and is appropriate given the presence of the caravan/camping site that should be within the defined SA boundary).

Please do not hesitate to contact me should you wish to discuss any of the points raised above and or discuss the suggested amendments to the emerging policies.

Yours faithfully