

Transport

Executive Summary

| KEY POINTS RAISED | |
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| 1. | The level of development proposed at both the Chase Park and Crews Hill strategic site allocations will cause cumulative adverse road impacts across the borough's road network. This issue will be exacerbated by the relatively long walking distance to access existing local facilities and services (both strategic site allocations are located over a 23-minute walking distance from district centres). This will particularly be the case along Hadley Road and Enfield Road, where volume/capacity ratios already exceed 100%. This too will lead to increased air pollution levels. |
| 2. | There are considerable distances between the Chase Park and Crews Hill site allocations and existing facilities and this will lead to additional private car usage amongst residents. As such, the proposed strategic allocations conflict with Policy T2 (Healthy Streets) of the London Plan, as it clear that the development of these sites would lead to increased car dominance. |
| 3. | Evidence highlights that walking and cycling will not be the natural day-to-day choice for moving around from both of the strategic site allocations, as prospective residents would live over a 23-minute distance walk from Tube / Rail stations. Therefore, it is likely that residents would have to rely upon more unsustainable means of travel for their daily commute. This conflicts with the Mayor of London's Good Growth principles (as set out within the Mayor of London's Transport Strategy [2018] ¹), as the resultant developments would not have good access to the public transport system. |
| 4. | Site allocation SA 45 (Land between Camlet Way and Crescent West, Hadley) will result in increased traffic and congestion on local commuter roads, such as Cockfosters Road. Concerningly, Cockfosters Road is highlighted within the LB Enfield Baseline Transport Review (2021) ² as yielding a current morning delay of over 50 seconds during rush hour. In reality, congestion on Cockfosters Road often results in delays of approximately 15 minutes during rush hour. The LB Enfield Baseline Transport Review (2021) also notes that <i>"there are significant car trips made to the north and north west of the borough, which can be inferred is due to poor public transport connections"</i> and adds that <i>"bus services [...] lacks sufficient connections towards the north west of the borough"</i> . Evidence also suggests that there are concentrations of crashes and accidents along Cockfosters Road. In the absence of any mitigatory measures both issues will worsen if the site allocation is developed. Furthermore, the LB Enfield Baseline Transport Review (2021) states that <i>"there is an opportunity for vehicles to use Waggon Road which ... would reduce congestion at M25 junction 24"</i> . Given that Waggon Road has no existing pavement, this recommendation would likely lead to additional accidents involving pedestrians and cyclists within the local area. |

¹ <https://www.london.gov.uk/sites/default/files/mayors-transport-strategy-2018.pdf>

² <https://new.enfield.gov.uk/services/planning/transport-baseline-review-report-wsp-2021-planning.pdf>

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| 5. | <p>At current, Hadley Wood is only served by an on-road national cycle route, which passes through the western edge of the settlement. It is therefore clear that any prospective residents would have very limited opportunities to cycle to work or access services and facilities by bike. In addition, public transport (rail and bus services) in Hadley Wood are poor (Hadley Wood has respective PTAL ratings of just 0, 1A and 1B: the lowest ratings attainable), and, as noted in the LB Enfield Infrastructure Delivery Plan, local rail services are not planned to receive investment over the Plan period. At present, public transport services are incredibly limited, offering direct routes by rail south to New Barnet (LB Barnet) or north to Potters Bar (Hertsmere). There is only one bus route (399) which provides a service from Hadley Wood Station to the Spires Shopping Centre in Barnet. It is not possible to travel by bus to Enfield Town or Cockfosters via Hadley Wood. The lack of good quality public transport services, combined with limited walking and cycling infrastructure, accentuates the ‘unsustainability’ of land at Camlet Way and Crescent Way for development, and will support use of the car as the primary mode of travel. As such, there is no evidence to justify the designation of site allocation SA 45 (Land between Camlet Way and Crescent West, Hadley), as, contrary to paragraph 105 of the NPPF and Policy T1 of the London Plan, there is no proof to suggest that site allocation SA 45 (Land between Camlet Way and Crescent West, Hadley) can be made sustainable.</p> |
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Policy Context

National Planning Policy Framework

- 1.1. The National Planning Policy Framework (NPPF) promotes sustainable transport. It states:

“Transport issues should be considered from the earliest stages of plan-making and development proposals so that:

- a) the potential impacts of development on transport networks can be addressed;*
- b) opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated;*
- c) opportunities to promote walking, cycling and public transport use are identified and pursued;*
- d) the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and*
- e) patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places”.*

- 1.2. Paragraph 105 of the NPPF adds that:

“the planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making”.

London Plan

- 1.3. Chapter 10 of the London Plan (2021) emphasises the need for a strategic approach to transport matters. Policy T1 (Strategic Approach to Transport) (clause A) of the London Plan states that *“development plans should support, and development proposals should facilitate the delivery of the Mayor’s strategic target of 80% of all trips in London to be made by foot, cycle or public transport by 2041 [...]”.*
- 1.4. Central to meeting the aims of Policy T1, Policy T2 (Healthy Streets) of the London Plan states that *“development proposals and Development Plans should deliver patterns of land use that facilitate residents making shorter, regular trips by walking and cycling. Development Plans should: (1) promote and demonstrate the application of the Mayor’s Healthy Streets Approach to: improve health and reduce health inequalities; reduce car dominance, ownership and use, road danger, severance, vehicle emissions and noise; increase walking, cycling and public transport use; improve street safety, comfort, convenience and amenity; and support these outcomes through sensitively designed freight facilities, (2) identify opportunities to improve the balance of space given to people to dwell, walk, cycle, and travel on public transport and in essential vehicles, so space is used more efficiently and streets are greener and more pleasant”.*
- 1.5. Policy T4 (Assessing and Mitigating Transport Impacts) of the London Plan states that *“Development Plans and development proposals should reflect and be integrated with current and planned transport access, capacity and connectivity”.*

Mayor of London’s Transport Strategy (2018)

- 1.6. The Mayor of London’s Transport Strategy (2018) aims to ensure that regeneration and new developments incorporate the Mayor’s principles of Good Growth. To achieve ‘Good Growth’, transport should satisfy the following principles:
 - *“Good access to public transport*
 - *High-density, mixed-use developments*
 - *People choose to walk and cycle*
 - *Car-free and car-lite places*

- *Inclusive, accessible design*
- *Carbon-free travel*
- *Efficient freight*".

1.7. The Mayor of London's Transport Strategy also sets out the Healthy Streets Approach, which includes ten healthy streets indicators, which, as stated in the Strategy "*provide a framework for putting human health and experience at the heart of planning the city*".

LB Enfield Transport Plan (including the Local Implementation Plan (2019))

1.8. The Enfield Transport Plan sets a number of strategic objectives for the borough. Of relevance, the Enfield Transport Plan, Objective 1 states that the Plan will "*deliver Cycle Enfield and support measures which encourage more walking and cycling in the borough*", and Objective 3 which is as follows: "*monitor air quality and develop and deliver interventions which address local issues*".

Transport impacts from Chase Park and Crews Hill developments

Road Network

1.9. It is considered that the level of development proposed at both the Chase Park and Crews Hill developments will cause cumulative adverse road impacts across the borough's road network. This issue will be exacerbated by the relatively long walking distance to access existing local facilities and services (both strategic site allocations are located more than a 23-minute walking distance from district centres, as evidenced within this representation). As such, it is highly likely that these strategic site allocations will promote further car usage and ownership. This in turn will create congestion within the local road network.

1.10. As highlighted in Figure 1, sections of the A111 (Cockfosters Road/Stagg Hill) and Hadley Road already yield a volume/capacity ratio of between 90 - >100% during morning peak times, therefore further congestion can be expected in these locations. As such, it is clear that LB Enfield Council has failed to comply with paragraph 104(a) of the NPPF on the grounds that the Plan has not adequately addressed the potential impacts of the development on the transport network.

1.11. It is also important to note that the entire borough of LB Enfield is designated as an Air Quality Management Area (AQMA). Through the designation of these two strategic site allocations, the LB Enfield Regulation 18 Local Plan has also failed to meet the aims of the LB Enfield Air Quality Action Plan (2001)³, as it is clear that the

³ <http://aqma.defra.gov.uk/action-plans/LBoE%20AQAP.pdf>

LB Enfield Regulation 18 Local Plan will not result in a reduction in vehicles and vehicle emissions for nitrogen dioxide and particulates.



Figure 1: Volume/capacity loads on the local road network during morning peak hours (source: LB Enfield Baseline Transport Review, 2021)

Walking and Cycling Network

- 1.12. It is evident that, whilst the Crews Hill and Chase Park allocations are seeking to incorporate ‘healthy streets’ principles within the schemes themselves, both site allocations are a considerable distance from the existing main centres within LB Enfield.
- 1.13. Comfortable walking distances to centres are recognised as being 800 metres, equivalent to a ten-minute walk. However, as shown in Figure 2, both site allocations fall somewhat outside of this distance. Enfield Town is the closest town centre to both the Chase Park and Crews Hill site allocations, located approximately 2.8km away (35-minute walk) and 3.65km (46-minute walk) away from the centroid of both site allocations respectively. Both distances greatly exceed what is considered in good practice as a suitable distance to access local services and facilities.

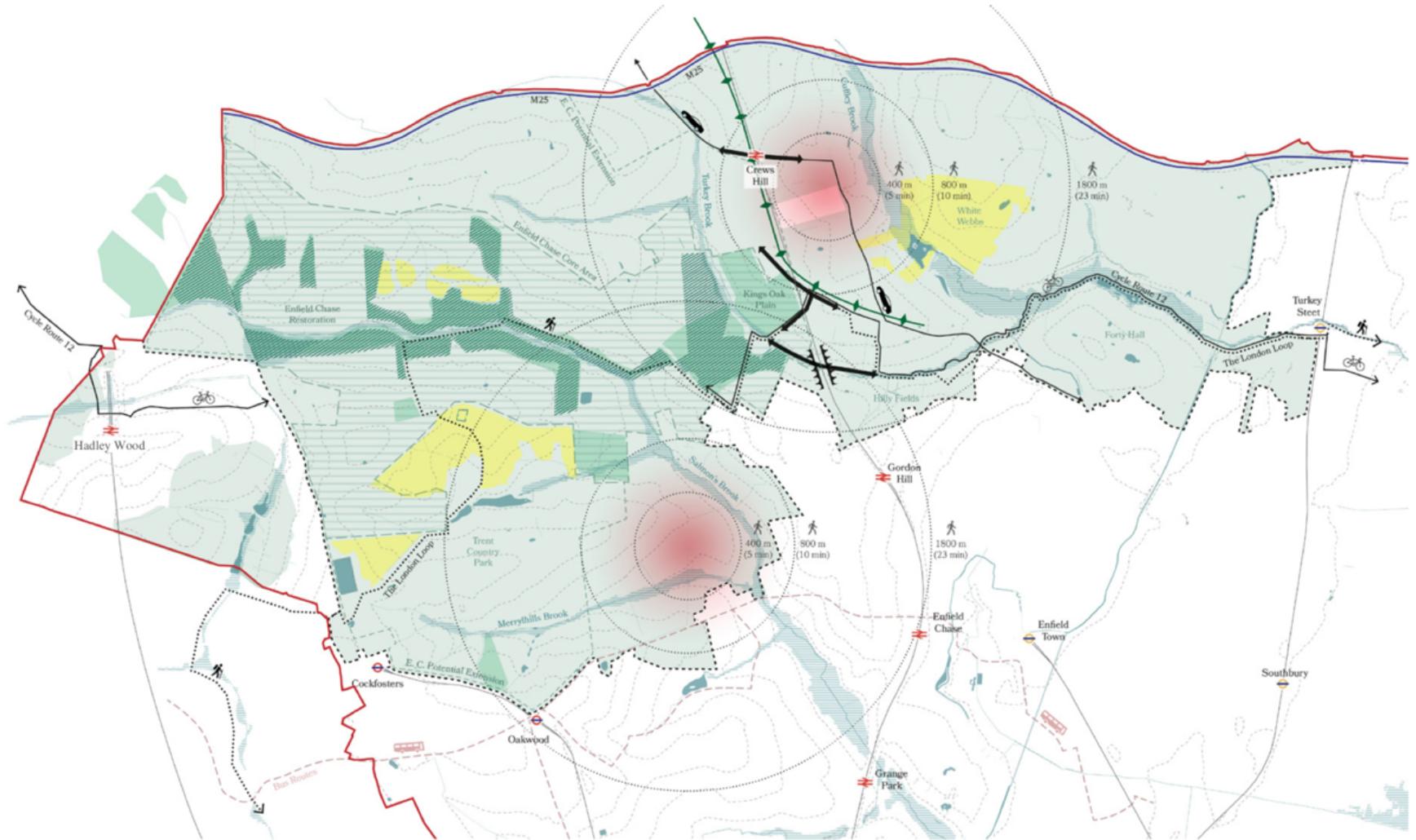


Figure 2: Context maps for Chase Park and Crews Hill site allocations (source: Chase Park Placemaking Study, 2021)

1.14. With the above in mind, it is considered that the extensive distances between existing services and the planned site allocations would lead to additional private car usage amongst residents. As such, the proposed strategic allocations conflict with Policy T2 (Healthy Streets) of the London Plan, as it clear that the development of these sites would lead to increased car dominance. To mitigate these impacts, LB Enfield Council should accord with paragraph 105 of the NPPF, which states that *“significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes”*. It is therefore recommended that these sites are re-considered to ensure that more sustainable modes of transport are available to local residents.

1.15. Furthermore, it is considered that the LB Enfield Regulation 18 Local Plan falls woefully short in terms of addressing climate change impacts. With regards to the Chase Park strategic site allocation, the Chase Park Placemaking Study (2021)⁴ states the following (our emphasis added):

“To address the Climate and ecological emergencies, it is critical that where land (especially greenfield land) is removed from Green Belt, it is developed in a way that maximises sustainability and minimises carbon footprint. This begins with the location of the development. Chase Park offers an opportunity to deliver housing in a location which will be accessible with good public transport connections within walking and cycling distance, and where there are opportunities for leisure and active lifestyles on the doorstep. The development must not be low-density and car-dominated, but rather show how contemporary suburbs can offer high-quality family accommodation in a way that makes active travel – walking and cycling – the natural choice for day to day moving around.”

1.16. As shown above in Figure 2, it is clear that walking and cycling will not be the natural day-to-day choice for moving around, as prospective residents would live more than a 23-minute distance walk from Tube stations, and, in the case of the Chase Park site allocation, approximately a 20-minute walk away from a train station. It is thus highly likely that residents would have to rely upon more unsustainable means of travel for their daily commute. Indeed, this reliance upon private vehicles aligns with existing travel to work data, which, as highlighted in Table 1 below, reveals that almost half of existing LB Enfield residents travel to work by car or van. Therefore, to encourage modal shift to more sustainable means of travel, this will require considerable improvements to rail and investment in walking and cycling infrastructure. However, based on the information presented in the Chase Park Placemaking Study (2021)⁵, very little has been proposed in relation to rail infrastructure improvements. This conflicts with the Mayor of London’s Good Growth principles (as set out within the Mayor of London’s Transport Strategy [2018]⁶), as the resultant developments would not have good access to the public transport system.

⁴ <https://new.enfield.gov.uk/services/planning/chase-park-topic-paper-lbe-2021-planning.pdf>

⁵ <https://new.enfield.gov.uk/services/planning/chase-park-topic-paper-lbe-2021-planning.pdf>

⁶ <https://www.london.gov.uk/sites/default/files/mayors-transport-strategy-2018.pdf>

| Method of Travel | Enfield | London |
|-----------------------------|---------|--------|
| Drive Car/ Van or Passenger | 47% | 31% |
| Bicycle | 1% | 4% |
| On Foot | 7% | 9% |
| Public Transport | 43% | 53% |
| Other | 2% | 2% |

Table 1: Method of travel to work in Enfield and London as a whole (source: LB Enfield Transport Plan, 2019)

Site allocation SA 45 (Land between Camlet Way and Crescent West, Hadley)

Road Network

- 1.17. As covered below within this representation, the inadequate levels of existing walking and cycling infrastructure within Hadley Wood will result in high levels of car usage by prospective residents. As evidenced above in Table 1, LB Enfield yields very high car/van travel to work methods in comparison to London as a whole. Therefore, the Association is highly concerned that site allocation SA 45 (Land between Camlet Way and Crescent West, Hadley) will result in increased traffic and congestion on local commuter roads, such as Cockfosters Road. Concerningly, Cockfosters Road is highlighted within the LB Enfield Baseline Transport Review (2021)⁷ as yielding a current morning delay of over 50 seconds during rush hour (as show in Figure 3). In the absence of any planned improvements to Cockfosters Road, it is considered that the LB Enfield Regulation 18 Local Plan does not comply with paragraph 104a of the NPPF, as it is clear that the potential impacts on the local road network have not been adequately addressed.
- 1.18. There are also significant safety concerns relating to the increased use and reliance on Cockfosters Road, as, as shown in Figure 4, a concentration of ‘slight’ and ‘serious’ accidents were recorded here, with a cluster of accidents taking place on the Cockfosters Road/Beech Hill junction. This too provides evidence as to why site allocation SA 45 (Land between Camlet Way and Crescent West, Hadley) is wholly inappropriate and, contrary to paragraph 11a of the NPPF, is situated within an unsustainable location.

⁷ <https://new.enfield.gov.uk/services/planning/transport-baseline-review-report-wsp-2021-planning.pdf>



Figure 3: Delay on the local road network during morning peak time (source: LB Enfield Baseline Transport Review 2021)

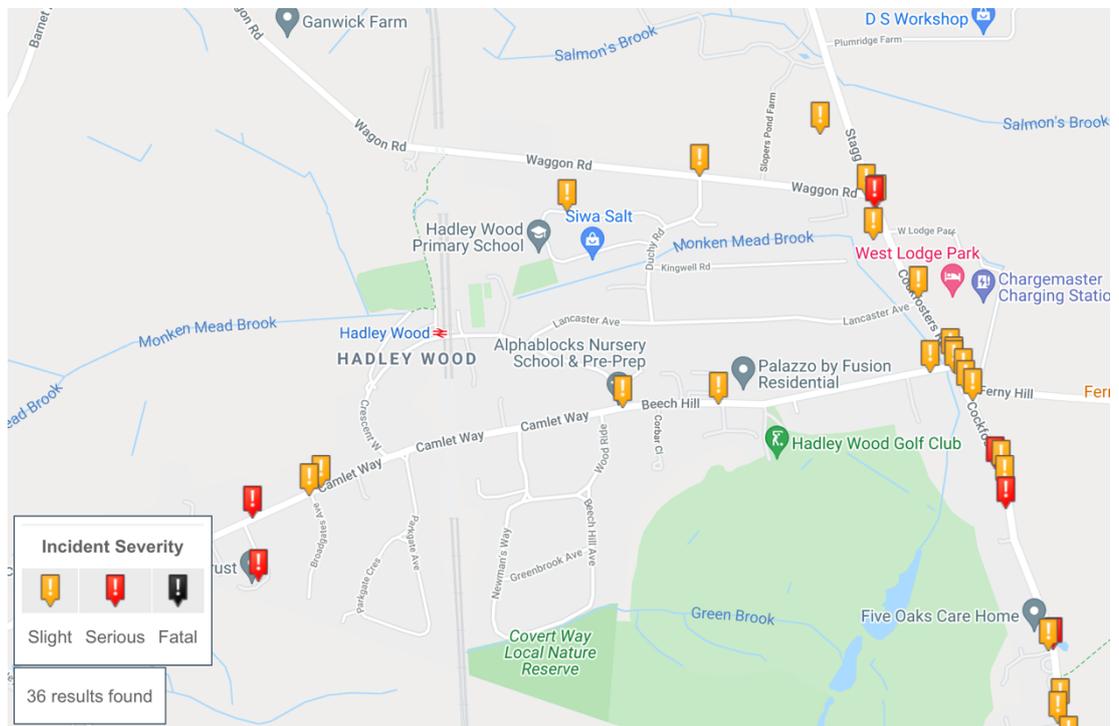


Figure 4: Crash localities in Hadley Wood over the period 2016-2020 (source: CrashMap)

Walking and Cycling Network

- 1.19. As clearly shown in Figure 5 below, site allocation SA 45 (Land between Camlet Way and Crescent West, Hadley) has very poor existing cycle connections. At current, Hadley Wood is only served by an on-road national cycle route, which passes through the western edge of the settlement. This national cycle route is severed by Cockfosters Road in the east, thus isolating Hadley Wood from other built-up areas within LB Enfield. It is therefore clear that any prospective residents would have very limited opportunities to cycle to work or access services and facilities by bike.

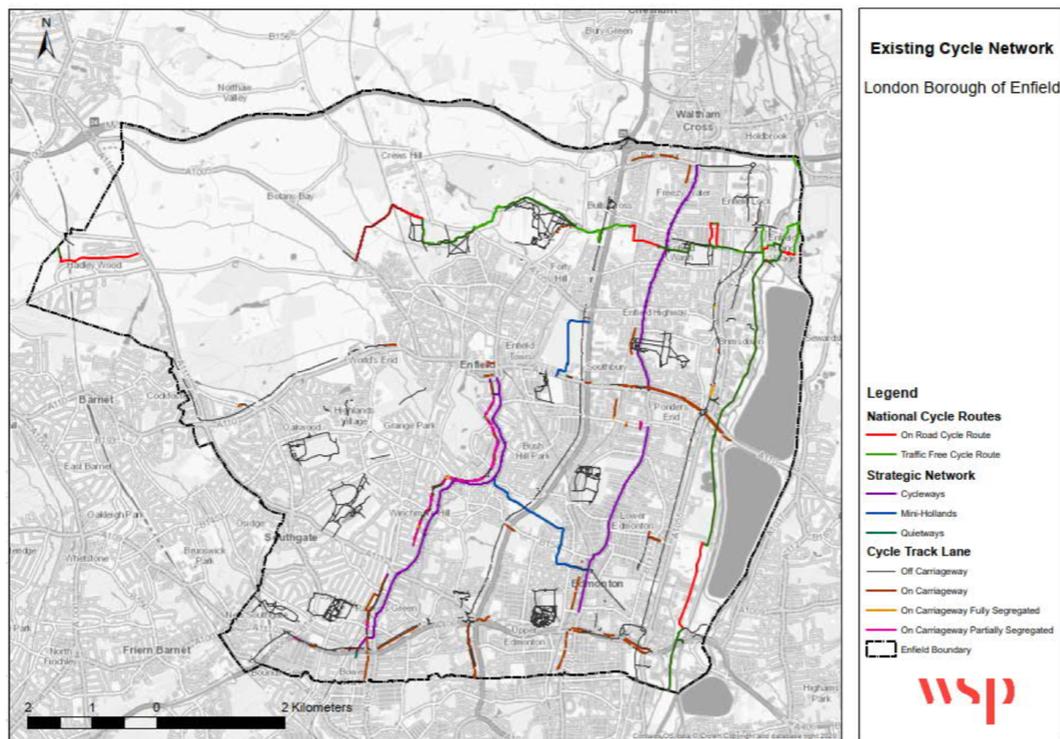


Figure 5: LB Enfield existing cycle network (source: LB Enfield Baseline Transport Review, 2021)

- 1.20. Further evidence (as shown in Figures 6 and 7 below) reveals that this oversight cannot be mitigated or addressed in the future, as Department for Transport data highlights that Hadley Wood has very low walking and cycling potential, as Hadley Wood yielded the lowest threshold of switchable trips for both active travel modes.

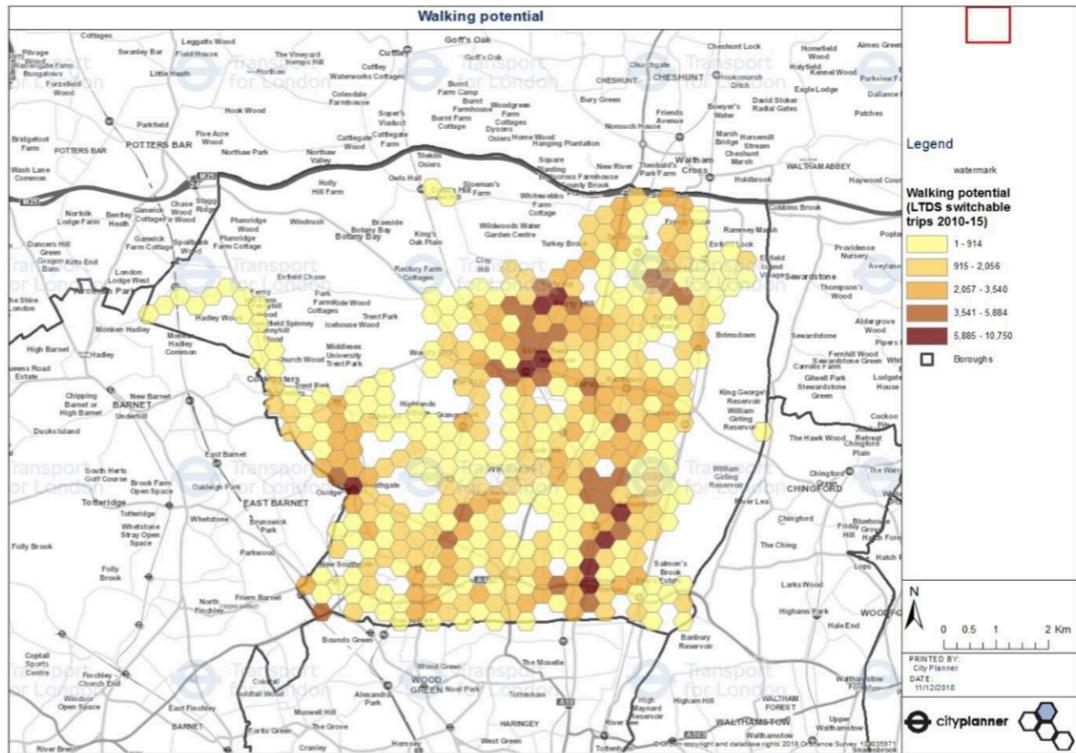


Figure 6: Department for Transport walking potential map (source: LB Enfield Baseline Transport Review, 2021)

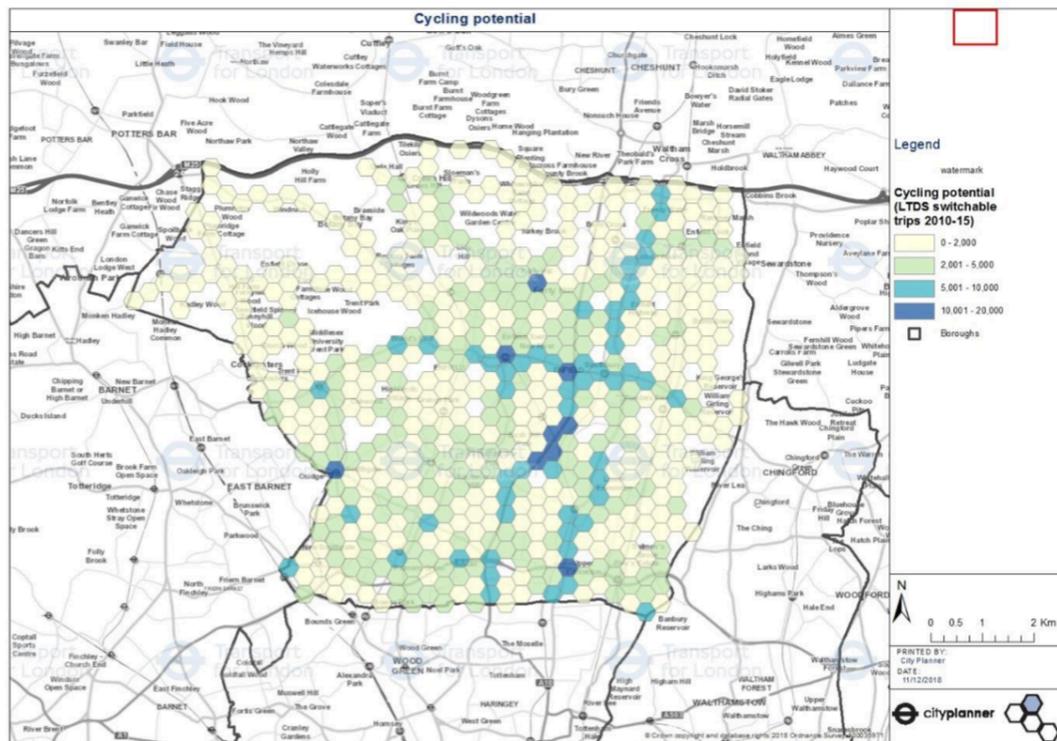


Figure 7: Department for Transport cycling potential map (source: LB Enfield Baseline Transport Review, 2021)

1.21. Given the above, it is unsurprising that Hadley Wood has very high concentrations of car/van accessibility, yielding an average of 2.1-2.5 cars/vans per household (as shown in Figure 8 below).

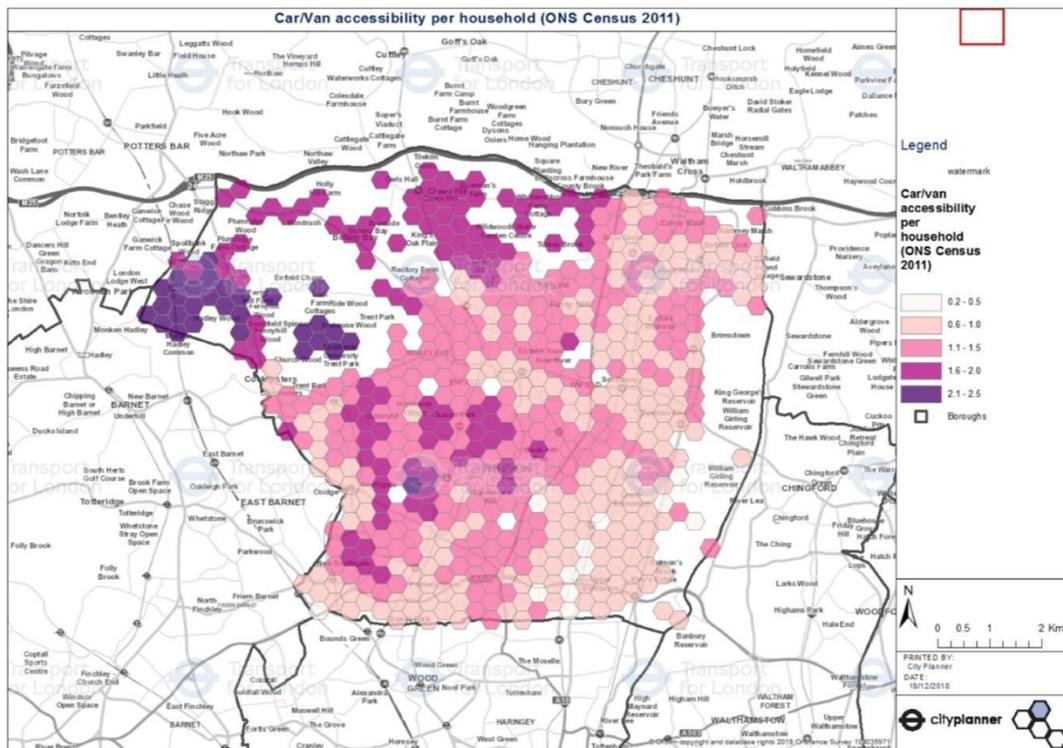


Figure 8: Car/van accessibility by household map (source: LB Enfield Baseline Transport Review, 2021)

1.22. The above is further evidenced by the Walkability Index (Index (produced by Space Syntax on behalf of the Hadley Wood Association and attached to this representation), which reveals that site allocation SA 45 (Land between Camlet Way and Crescent West, Hadley) likely has a walking catchment distance to the station of between 15-25 minutes. As highlighted in Figure 9 below, the Walkability Index takes account of the local road network (as opposed to blunt ‘as the crow flies’ distance measurements). Therefore, this is considered to give a more accurate distance and time measurement. As such, it cannot be considered that the site offers a sustainable means of accessing Hadley Wood Station.

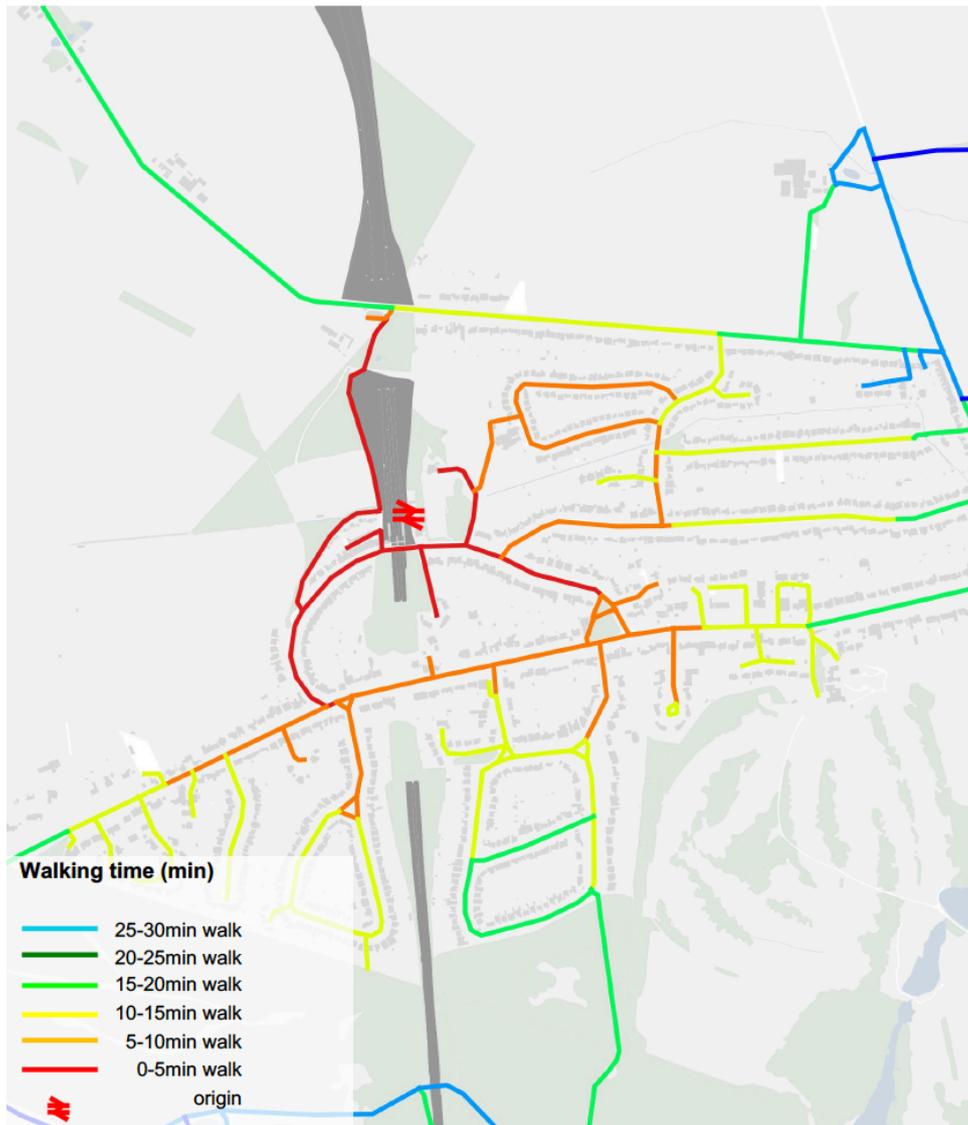


Figure 9: Walkability Index Hadley Wood Station walking catchment scores

- 1.23. As demonstrated above, there is no evidence to justify the designation of site allocation SA 45 (Land between Camlet Way and Crescent West, Hadley), as, contrary to paragraph 105 of the NPPF and Policy T1 of the London Plan, there is no proof to suggest that site allocation SA 45 (Land between Camlet Way and Crescent West, Hadley) can be made sustainable, nor is there any possibility for the site allocation to contribute towards meeting the Mayor of London’s strategic target of “80% of all trips in London to be made by foot, cycle or public transport by 2041”, as the site’s poor connectivity by cycle or on foot will prevent positive modal shift towards more sustainable modes of transport.

Public Transport

- 1.24. As highlighted within the housing paper prepared as part of this representation, the PTAL rating for Hadley Wood is the lowest it can be (PTAL 0, 1a and 1b) and, although served by the Greater Northern line, services are relatively limited. The Regulation 18 Infrastructure Delivery Plan (2021)⁸ confirms that there will be no significant improvements to this service. Similarly, bus services are also poor, with Hadley Wood only being served by the 399 bus which provides an hourly service between 10:00 and 14:00 between Hadley Wood, Monken Hadley and Chipping Barnet⁹. With this in mind, it is clear that there are limited opportunities for residents to travel by public transport. These issues are therefore likely to increase local car usage, thus undermining the sustainability objectives of the Local Plan and intentions to achieve a mode shift away from the car.

⁸ <https://new.enfield.gov.uk/services/planning/draft-infrastructure-delivery-plan-lbe-and-inner-circle-2021-planning.pdf>

⁹ <https://tfl.gov.uk/bus/timetable/399?fromId=490001130W>