



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,



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

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| 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. |
| 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 | We welcome parts 7 – 11 of this policy which require contributions to improve the public realm, active travel and crossing |

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| Angel Edmonton | 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. |
| SP PL9 Crews Hill | <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</p> |

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| | <p>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> <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</p> |

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| | 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. |
| SP SCI Improving health and wellbeing of Enfield's diverse communities | 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. |
| SP BGI 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 DEI 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 EI 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.' |

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| | <p>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. 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.</p> |
| <p>SP E3 Protecting employment locations and managing change</p> | <p>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.</p> |
| <p>SP TCI Promoting town centres</p> | <p>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.</p> |
| <p>10.5.3</p> | <p>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.</p> |
| <p>SP RE3 Supporting the rural economy</p> | <p>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'.</p> |
| <p>13.2</p> | <p>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</p> |

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| | <p>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.</p> |
| <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> |

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| | 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 Land at Chase | See comments above under SP PL10 which are relevant to this site allocation. |

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| 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. |