



Dear Sir / Madam,

RE: ENFIELD LOCAL PLAN, MAIN ISSUES AND PREFERRED APPROACHES

Thank you for providing the opportunity to comment on the Enfield Local Plan, Main Issues and Preferred Approaches (June 2021).

Please note that our representations below are the views of the Transport for London Commercial Development (TfL CD) planning team in its capacity as a landowner in the borough only and are separate from any representations that may be made by TfL in its statutory planning role and / or as the strategic transport authority for London. Our colleagues in TfL Spatial Planning have provided a separate response to this consultation in respect of TfL-wide operational and land-use planning / transport policy matters as part of their statutory duties.

TfL CD have engaged through the Local Plan preparation process and have previously submitted the following representations to date:

- Enfield Local Plan, Issues and Options (January 2019)
- Enfield Call for Sites (February 2019)
- Enfield Call for Sites (December 2019)
- Enfield Call for Sites (February 2021)

Draft Policy SP SS1 : Spatial Strategy

TfL CD retain a pipeline of sites capable of delivering in excess of 13,000 new homes within Greater London, of which a proportion are intended for Enfield. TfL CD firmly support Section 3 of Draft Policy SP SS1 which prioritises the redevelopment of '*brownfield land, vacant and underused buildings*' for new homes, with development being focused within town centres and at transport nodes. This approach promotes development in sustainable locations in line with the national and London policy framework. As such, TfL CD commend Enfield's 'Intensification Around Transport Nodes and Town Centres', as shown in Figure 2.1 with regard for its sites at Cockfosters, Arnos Grove, Oakwood, Enfield Town, and Bush Hill Park stations. TfL CD equally commend the identification of Arnos Grove within the New Southgate placemaking area.

TfL CD also support Section 13 of this policy, which makes provisions for the Green Belt to be protected from inappropriate development in line with Government policy. TfL CD promote the continued protection of the Green Belt within Enfield by prioritising the development of brownfield land and making best use of land outside the Green Belt, as required by London Plan Policies G2 and GG2.



Draft Policy SP SS2: Making Good Places

TfL CD request that the policy wording in Section 4 of Draft Policy SP SS2 is revised to provide greater flexibility in the context of scheme viability and consideration of site constraints. TfL CD therefore recommend this integrates the preceding clause, *'Development proposals should where feasible...'* before the policy criterion.

Draft Policy SP PL I : Enfield Town

TfL CD welcome Enfield Council's inclusion of Enfield Town as a Placemaking Area, particularly within the context of the development opportunities at Enfield Town Station, which TfL CD have promoted in the borough's Call for Sites. As set out in Section 9 of Draft Policy SP PL I, TfL CD commend the provisions made for tall buildings and other high-density developments to be concentrated around railway stations within Enfield Town, as per Figure 7.4.

TfL CD recommend, however, that Enfield Council includes a caveat within Section 5 and Section 6 of Draft Policy SP PL I respectively to ensure that contributions are sought in relation to developments where viable and necessary to mitigate the impacts of proposals.

Comments in relation to Draft Allocation SA4, Enfield Town Station and The Former Enfield Arms, Genotin Road, which is located within the Enfield Town Placemaking Area, are provided separately below.

Draft Policy SP PL7: New Southgate

TfL CD broadly support Enfield Council's vision for development within New Southgate, as cited within Draft Policy SP PL7. TfL CD support Enfield's advocacy for tall buildings in selected locations where appropriate and in accordance with Policy DE6, and the creation of *'a thriving mixed-use place through dense forms of residential development offering a range of housing typologies'*.

Specifically, in relation to Sections 4-7 of the Draft Policy, TfL CD recommend that contributions are sought for developments where viable and necessary to mitigate the impacts of development proposals.

We note that Section 7 of the Draft Policy SP PL7 identifies the opportunity for development to *'contribute to enhancing the public realm to make walking and cycling significantly more accessible, safer and attractive environment'*. We support this aspiration. It also states that development should contribute towards *'improvements to enhancing the public realm around Southgate station'*. We note that this is likely to be an error, and that Figure 3.8 identifies public realm opportunities at New Southgate railway station and Arnos Grove Underground Station. We recommend that this wording is reviewed to reflect the locations within the Placemaking Area. We support the inclusion of the identified public realm opportunity adjacent to Arnos Grove Underground Station.

Comments in relation to Draft Allocation SA24, Arnos Grove Car Park, which is located within the New Southgate Placemaking Area, are provided separately below.

Draft Policy SP SE I : Responding to the Climate Emergency

It is suggested that Draft Policy SP SE I Section 4 is amended to prioritise heat decarbonisation, with no new gas connections, ensuring all heating and hot water to be provided through low carbon sources



'where possible' and that it is acknowledged that this may include air source heat pumps with the continuing decarbonisation of the National Grid.

Draft Policy DM SE2: Sustainable Design and Construction

With regard to Sections 2 and 3 of Draft Policy DM SE2, TfL CD commend Enfield Council's use of assessment frameworks to maximise sustainability within developments. TfL CD's internal benchmarks are for residential schemes to meet as a minimum HQM 4* and non-residential development to meet BREEAM Excellent. Whilst the highest possible certification is sought on schemes beyond these certifications, and we welcome that the policy requirements are in excess of industry standard practice, it may not be feasible to exceed these levels in all instances.

Draft Policy DM SE3: Whole-Life Carbon and Circular Economy

Section 2 of Draft Policy DM SE2 requires major development proposals to calculate whole life-cycle carbon emissions through a nationally recognised whole life cycle carbon assessment, in line with London Plan Policy SI 2. TfL CD welcome this policy, but request that the wording is amended to state that this requirement applies to proposals '*referable to the Mayor*' to accord with Section F of London Plan Policy SI 2.

Draft Policy DM SE5: Greenhouse Gas Emissions and Low Carbon Energy Supply

Table 4.4 requires a minimum on-site total reduction in CO₂ of up to 45%, which is 10% higher than the London Plan requirement in Policy SI 2. Whilst we commend the aspiration behind these requirements, their feasibility has not been evidenced, and site-specific considerations and viability may preclude these from being achieved.

Where London Plan requirements are not met, TfL CD recommend Enfield Borough Council' levy a contribution levied against the London Plan targets. Table 4.5, Carbon Offset Tiers, indicates categories for offset contribution payments e.g., £XX/tCO₂ over 30 years. TfL CD request to be directly informed of Enfield Council's proposed tariff and methodology when reviewed and integrated within the emerging Local Plan.

Furthermore, TfL CD recommend Enfield Council include a caveat relating to feasibility within Section 5 of Policy DM SE5. As such TfL CD recommend an amendment to state that development should seek to connect to a decentralised energy network where the operator is willing to extend and '*where feasible*'.

Draft Policy SP SC2: Protecting and Enhancing Social and Community Infrastructure

With regard to Draft Policy SP SC2, TfL CD recommend Enfield Council revise Sections 3 and 4 to state that contributions '*may be sought*', rather than '*will be sought*' as these requirements will be dependent on the specific considerations set out within each policy in relation to education and healthcare.

Draft Policy SP BG4: Green Belt and Metropolitan Open Land

TfL CD does not support Section 2 of Draft Policy SP BG4 which allows for development within the Green Belt and on Metropolitan Open Land where there is no significant detrimental impact on their openness, and the character of their surroundings is respected. As per Policy G2 of the London Plan, Enfield's Green Belt, '*Exceptional circumstances are required to justify either the extension or de-designation of the Green Belt through the preparation or review of a Local Plan*'. TfL CD recommend



Enfield's draft policies be amended so as to explicitly preclude development within the Green Belt. Equally, Policy SP BG4 should actively encourage and advocate the use and optimisation of brownfield sites within the borough to mitigate the need for Green Belt development.

Draft Policy SP BG5: Green Belt and Edges of The Countryside/Urban Areas

Refer to TfL CD's comments regarding Draft Policies SP BG4 and SP SS1 above.

Draft Policy DM BG8: Urban Greening and Biophilic Principles

TfL CD welcome the aspiration to exceed London Plan targets in relation to the urban greening factor as set out in Section 1 of Draft Policy DM BG8, and will seek to exceed this target wherever possible. However, we recommend the inclusion of a caveat which states that this should be achieved where viable and subject to site constraints. Draft Policy DM BG8 should accord with London Plan Policy DF1, which sets out that '*applicants and decision-makers should firstly apply priority to affordable housing and necessary public transport improvements*' and the priorities set out in Section D of the policy.

Draft Policy SP DE1: Delivering A Well-Designed, High Quality and Resilient Environment

TfL CD recommend Enfield Council consider the significance and pertinence of innovation within Draft Policy SP DE1. Facilitating innovation permits the delivery of infrastructure, homes and commercial floorspace that remains sympathetic to the context and locality, as well as introducing creativity and diversity within the streetscape. TfL CD therefore recommend Enfield integrate a further characteristic of well-designed places, 'innovation', particularly within areas designated as 'transformative' in Figure 7.1.

Furthermore, in regard to Figure 7.1, TfL CD observe that Site A of the Cockfosters allocation (SA31) is designated as an area where a 'Transformative' level of change would be appropriate, whereas Site B is not. TfL CD instead request that both Sites A and B are collectively identified as appropriate for 'Transformative Level of Change' in order to provide substantial support for the development site as a whole. Similarly, TfL CD recommend Arnos Grove (identified by draft site allocation SA24) be amended from a 'Medium' to a 'Transformative' level of change, given Arnos Grove's allocation which is identified to be suitable for tall buildings.

Draft Policy DM DE2: Design Process and Design Review Panel

With regard to Draft Policy DM DE2, TfL CD consider Enfield Council's preferred approach to be broadly sound, however request the following amendments:

TfL CD recommend that within Section 2 a) ii) the type and timing of Design Review Panels would be more appropriately set out within the supporting text of Policy DM DE2 insofar as they provide additional detail pertaining to the policy that is dependent on the specific development.

Furthermore, at Paragraph 7.2.2 of the supporting text, TfL CD recommend that this is subdivided into two sections; 'Design Review' and 'Retaining Quality Post-Planning' separating out these two topics. In addition, TfL CD recommend it is clarified who Enfield Council's 'Design Guardian' is in Paragraph 7.2.3, and to whom they are appointed.



Draft Policy SP DE4: Putting Heritage at the Centre of Place Making

With regard to Draft Policy SP DE4, TfL CD recommend Section 2 (e) be revised to set out that access to cultural, built, and landscape heritage should be improved *'where appropriate'*, as this may be dependent, for example, on the use or condition of the respective heritage asset.

Section 2 (f) of Draft Policy SP DE4 stipulates that *'Contextual development affecting heritage assets or their setting should be of sufficient design quality to become future heritage'*. Regardless of TfL CD's overall support for policies that promote high design quality, TfL CD consider the assertion of the draft policy that heritage assets should be required to achieve the highest level of special or distinctive design required for listing, would not always be appropriate within the setting of existing heritage assets.

TfL CD instead recommend that Draft Policy SP DE4 Section 2 (f) be amended as follows:

"New development within the Borough should:

Where it affects contextual development affecting heritage assets or their setting, be designed contextually and should be of sufficient design quality to become future heritage' should make a positive contribution to local character and distinctiveness, drawing on the contribution of the relevant heritage assets".

Moreover, TfL CD consider that some of the detail within Section 7 of Draft Policy SP DE4 would be better placed as supporting text rather than policy, as it provides further clarification/explanation in relation to the policy. TfL CD recommend that this applies to the sentence *'Appropriate techniques for assessment may include...'* onwards within Section 7.

Draft Policy DM DE6: Tall Buildings

In conformity with Figure 7.4, Appropriate Locations for Tall Buildings, TfL CD are broadly supportive of Draft Policy DM DE6, and commend the identification of Arnos Grove, Cockfosters, Enfield Town Station and Oakwood as 'Appropriate Locations for Tall Buildings'.

Be that as it may, TfL CD questions the requirement for both Figures 7.3 and 7.4. TfL CD instead recommend Figure 7.3 be omitted from the emerging Local Plan with Figure 7.4 only instated so that the key information regarding sites suitable for tall buildings and the appropriate maximum heights in these locations are clearly set out in one place. In relation to Figure 7.4, the maximum heights in metres are difficult to read on the diagram and should be clarified for each site. It is also noted that heights for sites are also provided in storeys, based on 3m constituting a typical residential storey. However, given that these dimensions can vary, it is recommended that the policy and accompanying figures refer to building heights only to avoid confusion.

Specifically, in relation to the Cockfosters Station Site, Figure 7.3 identifies that the definition for 'tall buildings' in this locality refers to any buildings of 21m or above. However, it is noted that Site B is not indicated as appropriate for tall buildings by this draft figure. Given Site B forms part of Site Allocation SA31 and would contribute to the development of the Site as a whole, TfL CD recommend that this part of the allocation is included in the designation.

Figure 7.4 also indicates that appropriate tall buildings at the Cockfosters Station site would be a maximum of 45m in height. A planning application has been submitted for residential development, which sets out an approach to the development of both Sites A and B and has considered the principles of the London Plan for optimising capacity using a design-led approach as required by London Plan Policy D3. The strategy includes buildings ranging from 37m to 49.5m in height (based on the key to Figure 7.4, this is 'the total height of the building and includes an allowance at roof level for roof



parapets, plant rooms, lifts overruns, etc.'). The proposed scheme has been considered in line with the requirements and criteria set by London Plan Policy D9 and supporting text, with relevant design quality standards and technical considerations having been thoroughly assessed. The technical information which accompanies the planning application demonstrates how the proposals optimise the capacity of this highly sustainable site and comply with the national and London planning policy framework. Given the urgent need for housing in the borough, the site's location, and as previously developed land, there is a clear justification for buildings of the proposed scale in this location, proportionate to the sustainable location of the site in accordance with Policy D2 of the London Plan. As such we request that this is reflected in the proposed heights designated within the emerging Local Plan.

Furthermore, TfL CD recommend Section 2(c) of Draft Policy DM DE6 has consideration for Paragraph 202 of the National Planning Policy Framework (NPPF), which sets out that *'Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use'*. Paragraph 202 of the NPPF asserts that where a development may induce *'less than substantial harm'* to *'the significance of heritage assets'*, planning authorities should consider and *'weigh up'* the relative impact versus the public benefit. Therefore, TfL CD recommend this approach be reflected in the assessment of proposals involving tall buildings specifically in relation to heritage assets, their settings and protected views.

Draft Policy DM DE I 3: Housing Standards and Design

TfL CD broadly supports Draft Policy DM DE I 3, however request that clarity is provided in relation to Section I (g) which requires the provision of *'adequate'* car parking. TfL CD request that this policy is framed in the context of London Plan Policy T6, Car Parking, which requires that *'car-free development should be the starting point for all development proposals in places that are (or are planned to be) well-connected by public transport, with developments elsewhere designed to provide the minimum necessary parking ('car-lite')'* (Section B) and Draft Policy SP T I, which is consistent with this approach.

Draft Policy SP H I : Housing Development Sites

In conformity with our previous Call for Sites submissions, TfL CD support Enfield Council's inclusion of TfL CD's sites at SA4 Enfield Town Station and The Former Enfield Arms, Genotin Road, SA24 Arnos Grove Station Car Park, and SA3 I Cockfosters Station Car Park. TfL CD's responses to these allocations are provided separately below.

Notwithstanding the inclusion of these key sites, the annual housing target for Enfield (1,246) is significantly lower than that estimated in the Enfield Strategic Housing Market Assessment 2015 (2,048) and in MHCLG's Standard Methodology for assessing housing need (4,397). Furthermore, Enfield Council have historically underdelivered against identified housing need. Therefore, in order to meet and exceed the minimum housing target for the plan period, as well as account for preceding shortfalls, a step change in housing delivery within Enfield will be required. TfL CD recommend that Enfield Council should ensure that draft allocations are optimised for the delivery of homes, as well as a more intensive use of brownfield land, particularly within sustainable areas and highly accessible locations, such as adjacent to public transport nodes.

Draft Policy SP H2: Affordable Housing

TfL CD welcome a strategic target for 50% of all new homes provided across the plan period to be genuinely affordable. However, TfL CD request that the draft policy is revised so it is clear that the London Plan Threshold Approach (Policy H5) should be applied to individual applications in relation to



the level of affordable housing provided on sites. TfL CD have a portfolio agreement with the Mayor, as set out in London Plan Policy H5, requiring TfL CD to deliver 50% affordable housing across its portfolio, with a minimum provision of 35% on each site.

Furthermore, TfL CD seek clarification that the definition of 'genuinely affordable' aligns with the definition set out in the London Housing Strategy (2017). Additionally, TfL CD recommend that Section 3 of the draft policy measures affordable housing provision by habitable room, as per Paragraph 4.5.3 of London Plan.

Accordingly, in relation to Section 4 of the Draft Policy, TfL CD request that flexibility in tenure mix should be allowed in line with the London Plan Threshold Approach, Policy H5, rather than where developments propose more than 50% affordable housing, as currently stated in the draft policy. It is however unlikely that schemes providing over 50% would be viable, without significant public subsidy, even if all of the affordable homes were Intermediate tenure. This is evidenced by the fact that very few schemes have exceeded 50% affordable housing, even where flexibility of tenure had been allowed by Enfield Council.

Furthermore, a high-density Build to Rent scheme close to a busy transport interchange would be better suited to intermediate tenures than social tenures (for which the priority need is for larger families). Policy H11 of the London Plan therefore confirms that the tenure split in Build to Rent schemes can be entirely intermediate (Discounted Market Rent). This position is reiterated in Draft Policy H7 of the draft Enfield Local Plan which states Build to Rent schemes should '*provide on-site affordable housing in perpetuity in the form of Discounted Market Rent at genuinely affordable rent level*'.

TfL CD request that in relation to Draft Policy H2 Section 8 review mechanisms are applied in accordance with Policy H5 of the London Plan.

Draft Policy DM H3: Housing Mix and Type

TfL CD would seek to collaborate with Enfield Council to ensure its sites deliver an appropriate typology, mix, and size of residential dwelling in accordance with local requirements. TfL CD recommend that that Section 1 of Draft Policy DM H3 also has regard for housing type when determining an appropriate mix. Within Build to Rent developments, for example, demand for 1- and 2-bed units is often higher than other housing types.

TfL CD acknowledge Enfield Council's 'Dwelling Size Priorities', as set out within Table 8.4 of Draft Policy DM H3. However, TfL CD submit that the inclusion of a prescriptive mix for market homes should be removed on the basis that this need will differ depending on the type of housing proposed (sale, rental or retirement etc) and should instead respond to market requirements. It is not appropriate or effective for every type of development scheme to target delivery of the same mix of unit sizes, and therefore TfL CD recommend a flexible approach that considers market factors.

Draft Policy DM H4: Small Sites and Small Housing Development

In conformity with TfL CD's 'Small Sites Programme', TfL CD firmly endorse Draft Policy DM H4. TfL CD have promoted two sites through previous Call for Sites which form part of the Mayor's Small Sites programme: 108 – 12 Palmerstone Crescent and Land at Palmerstone Crescent and Bowes Road. As per TfL CD's 'Call for Sites' (February 2021), TfL CD consider both sites to be deliverable and capable



of collectively delivering in excess of 25 residential dwellings. Further commentary regarding both sites is provided separately below.

Draft Policy DM H7: Build to Rent

TfL CD supports the inclusion of policy for the provision of Build to Rent developments within Enfield, including affordable housing in the form of Discounted Market Rent. The GLA's Affordable Housing SPG (2017) however recognises that the greatest need for private rental housing is for 1 and 2 bedroom homes. Build-to-Rent schemes should not therefore be required to meet the same need which has been identified for sale homes.

Policy 4.1 of the Mayor's London Housing Strategy (2017) sets out the basis on which Intermediate Rental homes (including Discounted Market Rent) can be considered 'genuinely affordable'. No other definition of genuinely affordable is set out in planning policy or guidance. Policy H7 Section 1 should therefore confirm the Mayor's definition is to be used.

In respect of First Homes, paragraph 64 of the NPPF confirms that Build to Rent schemes are exempt from national requirements to deliver affordable home ownership products.

Draft Policy H7 Section 2 is inconsistent with Policy H7 Section 1, which confirms Build to Rent schemes will be supported when they '*provide on-site affordable housing in perpetuity in the form of Discounted Market Rent at genuinely affordable rent level*'. Whilst it is acknowledged that the London Plan does allow local authorities to require a portion of affordable housing as low-cost rent on Build to Rent schemes (Para 4.11.10), this approach must be justified and as such the approach in draft policy H7 would need to do so. It is considered that requiring Build to Rent schemes to deliver conventional affordable housing tenures will make Enfield less desirable for Build to Rent developers resulting in reduced diversity and delivery of housing. Furthermore, the supply of much needed intermediate rental homes would be constrained. Consideration would be required as to the feasibility, viability and suitability of this approach.

Draft Policy SP TC1: Promoting Town Centres

Recognising Enfield Council's objective to promote '*a balance of residential and main town centre uses to help town centres function as multifunctional hubs, supporting the provision of facilities, services, jobs and homes*', TfL CD broadly commend Policy SP TC1.

Draft Policy SP T1: Promoting Sustainable Transport

As per Section 1(c) of Policy SP T1, TfL CD support Enfield Council's expectation that new development will be "*car-free (or offer a low level of parking provision)*", in accordance with London Plan Policy T6, GG2, and the Mayor's Transport Strategy.

Draft Policy DM T2: Making Active Travel the Natural Choice

In accordance with Policy GG3 and T2 of the London Plan, TfL CD broadly commend Draft Policy DM T2 regarding Enfield Council's endorsement of the 'Healthy Streets Approach', as per Section 1.

Draft Policy SP D1: Securing Contributions to Mitigate the Impact of Development

TfL CD request that Section 4 of Draft Policy SP D1 in relation to review mechanisms accord with Policy H5 of the London Plan, Threshold Approach to Applications.



Site Allocations

Draft Allocation SA24 Arnos Grove Car Park

As per TfL CD's previous Call for Sites submissions to Enfield, TfL CD welcome the inclusion of draft allocation SA24, Arnos Grove Station Car Park. The site was subject to planning application ref. 20/01049/FUL for:

'Erection of 4No buildings between one to seven storeys above ground level, with some elements at lower ground floor level comprising 162 residential units (Class C3) and flexible use ground floor unit (Class A1/A3/A4) together with areas of public realm, hard and soft landscaping, access and servicing arrangements, plant and associated works'.

The application was submitted by Connected Living London, a joint venture between Grainger and Transport for London and received officer recommendation for approval. However, the application was refused at planning committee on 5th January 2021 and is now subject of a live appeal ref. APP/Q5300/W/21/3276466. Separate representations are being submitted by Connected Living London in relation to this site.

The Arnos Grove Station Car Park draft allocation, SA24, has a mixed-use capacity estimate of 162 homes, to be delivered over 0-5 years. TfL CD support that the site can deliver homes in the first five years of the plan period, therefore making a positive contribution towards housing need in the Borough and assisting to address historic under-delivery.

Paragraph 125 of the NPPF requires planning to optimise the use of land to meet as much identified need for housing as possible. The NPPF and London Plan require Local Plans and decisions to prioritise the redevelopment of brownfield land, under-utilised land, public sector land and sites that are well-connected by public transport and in sustainable locations for the development of homes. Furthermore, London Plan Policy D3, equally asserts development should accord with a 'design-led approach' to optimise development capacity of sites. The Site at Arnos Grove achieves all of these requirements and it is therefore positive that the site has been included as a draft allocation.

The draft allocation capacity estimate of 162 units reflects the live Appeal Scheme, and is therefore based on the extensive site appraisals which have been provided to Enfield Council alongside a planning application for the development of the site. Whilst the capacity estimate deviates from the Council's own evidence base set out by the Housing and Economic Land Availability Assessment (HELAA) (2021), this was not informed by extensive site analysis which was undertaken as part of the application process, which shows that at least 162 homes can be delivered in a high-quality development.

Draft Allocation SA31 Cockfosters Station Car Park (Parcels a and b) Cockfosters Road, Barnet

Similarly, following previous Call for Sites submissions to Enfield, TfL CD welcome the inclusion of draft allocation SA31 Cockfosters Station Car Park (Parcels a and b) Cockfosters Road. The site is subject to live planning application ref.21/02517/FUL for:

Demolition of existing two-storey Train Drivers Accommodation building and erection of four buildings, with part basement area, ranging in height between 5 and 14 storeys with recessed rooftop plant and lift overruns located behind a parapet and screens, and comprising 351 new residential dwelling units (Class C3) with flexible retail ground floor unit (Class E and/or drinking establishment (Sui Generis) uses),



replacement Train Drivers Accommodation (Sui Generis), cycle parking, public realm and open space, car parking, hard and soft landscaping, access and servicing, plant and associated works.

The application was submitted by Connected Living London (CLL), a joint venture between Grainger and Transport for London, validated on 6th July 2021. Separate representations are being submitted by Connected Living London in relation to this site.

TfL CD strongly support the inclusion of the Cockfosters Station Car Park, as a Draft Allocation in the Draft Enfield Local Plan. The Site provides a key opportunity for the borough to deliver much needed housing on a brownfield site at a sustainable location with high transport accessibility.

We recommend that the plan recognises the capacity of the site to accommodate at least 351 residential units, as demonstrated by the planning application. No evidence has been provided to justify that 316 units, as suggested by the draft allocation, is the site's capacity.

The proposals on the Site have been developed through an extensive design process, which involved altering the quantum of development, and testing alternatives of height, massing and layout to achieve a design that successfully responds to the site's constraints. It is also understood that Enfield Council's design officers consider that taller buildings could be acceptable, where doing so would help address issues relating to the massing strategy and impacts from longer distance views.

There is a requirement in the borough for available and deliverable sites in sustainable locations to be optimised. The site provides a significant opportunity to provide housing to address the evident shortfall in the borough, and optimising brownfield sites for housing delivery will reduce the need to seek sites for housing supply in the borough's Green Belt, which can continue to be protected from inappropriate development.

CLL have considered options for the site using a design-led approach and consider that it is capable of delivering 351 new homes. It is therefore recommended that the estimated capacity set out by draft allocation SA31 be set as a minimum target.

In addition, as indicated by the Call for Sites response submitted in February 2021, subject to planning permission, the site can be delivered within 0-5 years, assisting with Enfield's shorter-term residential supply. CLL have undertaken a full legal review of the property interests of the site and, subject to planning, can confirm that there are no impediments to delivering the site within the next 1 to 5 years. It is therefore suggested that the timeframe for delivery should be altered to 0-5 years, rather than 5-10 as is currently drafted. This would also assist with securing the requisite five year housing land supply, inclusive of a 20% buffer as set out by NPPF paragraph 74.

Draft Allocation SA4 Enfield Town Station and The Former Enfield Arms, Genotin Road

With regard to SA4, Enfield Town Station and The Former Enfield Arms, Genotin Road, Enfield Town Station remains within TfL CD's pipeline of future sites and we welcome the inclusion of this draft site allocation. In accordance with Enfield's SA4, TfL CD consider the allocation to be suitable for high density, mixed-use development, including residential, offices, retail and commercial, and cultural facilities. TfL CD also consider there to be an opportunity to enhance Enfield Town Station's transport facilities. As per SA4, TfL CD welcome the proposed timeframe of 5 – 10 years.



Other Sites

As per the submitted Call for Sites, dated February 2021, TfL CD's pipeline of sites with development potential in the borough should be considered a valuable resource, capable of delivering significant residential accommodation within Enfield and helping to prevent development on the Green Belt. TfL CD's sites would contribute new homes within appropriate and sustainable locations, primarily adjacent to accessible transport nodes.

Oakwood Station

Oakwood Station car park is owned in freehold by London Underground Limited and has been promoted through the February 2021 Call for Sites for the following:

'It is proposed that this site accommodates a residential led development that is respectful of the surrounding predominantly residential development, with scope for additional retail uses. Development on the site would be required to take a considered and sensitive approach to the impact upon the adjacent Green Belt.'

Initial feasibility work has indicated that the site is capable of accommodating c.100 residential units and has scope for inclusion of complementary retail/commercial uses. As a site that is adjacent to a station, with a good level of public transport accessibility, and within Oakwood Local Centre, with access to local shops, services and amenities, it is proposed that the site may be capable of supporting high density development, including tall buildings, in optimising the site's capacity. This would be subject to a design-led approach and consideration of design options to determine the most appropriate form of development that responds to the site's context, capacity for growth and existing and planned supporting infrastructure capacity'.

The HELAA 2021 has assessed this site (site reference COC11) and concludes that the site is available, suitable and achievable, and developable. The Housing topic paper clarifies the site selection methodology and sets out that a size threshold of 50 homes+ or 0.25ha was used to select sites to allocate. Oakwood Station car park measures 0.32 ha and could accommodate upwards of 50 units; therefore it should be allocated as a site allocation as it meets both of the threshold criteria.

The initial feasibility study undertaken by TfL CD in Autumn 2020 for this site considered the potential for redevelopment which incorporated the adjacent retail parade outside of TfL ownership. The inclusion of this retail parade would enable an enhanced retail/commercial provision to be provided on the ground floor, with increased opportunity for residential above, as well as providing the opportunity to optimise the development potential of the adjacent TfL site. TfL CD request that a site allocation is included which includes the Oakwood Station car park and the adjacent retail parade as shown by the illustration below. The feasibility study has indicated that this combined site would be able to accommodate 100 units, with maximum heights of 6 storeys. Should a site allocation be included for just the car park site, then TfL CD would suggest this should be for residential-led development and include a site capacity of approximately 65 units.



Extract from Oakwood Station Car Park Feasibility Study

Bush Hill Park Station

TfL CD retain leasehold ownership of Bush Hill Park Station Car Park, a 0.2-hectares landholding, capable of delivering residential accommodation within 0 – 5 years. TfL CD promoted the site within Enfield’s Call for Sites (February 2021), providing the following information:

‘The capacity of the site is to be determined. As a site that is adjacent to a station and within a Local Centre, which provides access to local shops, services and amenities, it is proposed that the site may be capable of supporting higher density development, including tall buildings, in optimising the site’s capacity. This would be subject to a design-led approach and consideration of design options to determine the most appropriate form of development that responds to the site’s context, capacity for growth and existing and planned supporting infrastructure capacity’.

Bush Hill Park Station Car Park is identified within the Enfield Local Plan HELAA (June 2021), as an available, suitable, achievable, and developable landholding. Furthermore, the Enfield HELAA stipulates a ‘baseline’ indicative capacity of 13 residential dwellings, deliverable within 6 – 10 years. On account of the site’s capacity to deliver residential accommodation within a locality adjacent to sustainable public transport and local amenities, TfL CD recommend this site’s inclusion and allocation within the Enfield Local Plan. It should also be noted that further feasibility work may indicate that the capacity of the site may exceed this quantum.

108 – 112 Palmerston Crescent

As per the Call for Sites submission of February 2021, TfL CD retain ownership of 108 – 112 Palmerston Crescent (N13 4NH). The site represents a 0.16 hectare developable landholding, capable of delivering



in excess of seven residential dwellings. TfL CD consider the site to be deliverable within 0 – 5 years via TfL CD's 'Small Sites Programme' and recommend its inclusion and designation within the Enfield Local Plan in order to proactively contribute towards Enfield's ambitious housing targets. TfL CD's promoted that the site '*would support the delivery of residential development on well-connected and underutilised vegetated land*'. Enfield's Local Plan HELAA identifies 108 –112 Palmerston Crescent (N13 4NH) as an available, suitable, achievable, and developable landholding, capable of delivering c.7 residential dwellings.

Land at Palmerstone Crescent and Bowes Road

Alike 108–112 Palmerston Crescent (N13 4NH), TfL CD retain ownership of Land at Palmerston Crescent and Bowes Road (N13 4UN), which '*would support the delivery of residential development on well-connected and underutilised vegetated land*'. Similarly, TfL CD consider Land at Palmerston Crescent and Bowes Road to be developable within 0 – 5 years, with an indicative capacity of c.18 residential units. Enfield's Local Plan HELAA identifies Land at Palmerston Crescent and Bowes Road as an available, suitable, achievable, and developable landholding, capable of delivering 18 residential units.

Concluding Remarks

We hope that these representations are helpful, but if you need any further information or would like to discuss any of the issues raised in our representations, please do not hesitate to contact me. We look forward to being kept up to date with your programme going forward.

Yours faithfully,