



Planning and Development

Re: Enfield's Regulation 18 draft Local Plan – 'Main Issues and Preferred Approaches' Broxbourne Council's consultation response

Thank you for the opportunity to comment on Enfield's draft Local Plan. Broxbourne Council's comments in respect of the consultation document are as follows:

1. We note that the draft Enfield Local Plan proposes 30,000 new homes by 2039. It is unclear from the consultation document how many new jobs are proposed. It appears that Enfield Council is proposing to accommodate this development primarily within the urban area, whilst releasing some Green Belt land to accommodate the remainder of the development. This includes 3,000 homes at Crews Hill. We also note the proposals for expansion of the Tottenham Hotspurs training facility at Whitewebbs Lane and for the creation of a 'National Park City' rural area.
 2. In January this year you wrote to us to seek our assistance with Enfield's unmet needs for 23 hectares of land for industrial distribution uses and 4,000 homes. Our response outlined the reasons why Broxbourne Council is unable to assist. We are pleased to note that the draft Local Plan appears to demonstrate that Enfield is capable of accommodating its housing and economic needs within its own administrative boundary and therefore appears to be no longer seeking assistance from Broxbourne.
 3. In February 2019 Enfield Council's 'Issues and Options' Local Plan consultation raised the prospect of a new junction onto the M25 from Mollison Avenue. In our response to that consultation we commented on potential highways implications for Broxbourne and Waltham Cross in particular. We can find no reference to such a proposal within the current consultation document. Should Enfield Council continue to progress this proposal we would be grateful for an early opportunity to comment on any transport modelling work in order to assess the impacts upon our borough.
 4. Broxbourne Council has prepared a Transport Strategy to underpin its own Local Plan (adopted June 2020). The modelling work underpinning that Strategy indicated a need for significant upgrades to the A10 north of Junction 25 in order accommodate the planned growth in Broxbourne. It also indicated a number of other pinch-points across the network. Given the very high levels of growth proposed within Enfield, there is a possibility that the cumulative or spillover impacts on the highways network within
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Broxbourne could be significant. We would be grateful for early sight of your transport modelling to understand those implications.

5. We note that the 12-hectare employment site allocation *SA52: Land West of Rammey Marsh* (page 372) is proposed to encompass the Small River Lea. Broxbourne Council is currently preparing an Area Action Plan for Waltham Cross and the Small River Lea has been identified as having potential as an active travel corridor between our two boroughs under the M25. We would be grateful if Enfield Council could consider how this could be accommodated as a part of evolving masterplans for site SA52. We realise that there may be implications for any proposed new M25 junction and would welcome a discussion regarding this.
6. We note that Figure 6.1 (contained within a separate 'Errata Note') shows the New River as a 'green link'. We understand that Enfield Council is also proposing to create an active travel corridor along the New River to the M25 crossover, subject to funding. We remain keen to progress this connection, particularly in light of the proposed film studios at Park Plaza West within Broxbourne.
7. We are in receipt of a list of 'Duty to Co-Operate' issues from Vincent Lacovara (email from May Hope dated 4 August 2021) which address a number of cross-boundary strategic planning issues arising from the Enfield Local Plan. Table 1 within that letter lists the following issues as having the potential to be 'duty to co-operate issues of relevance', and identifies which public bodies Enfield Council considers to be relevant to each matter. The table indicates that for Broxbourne these issues encompass:
 - Housing – housing need and pressure from neighbouring authorities
 - Gypsies and travellers - meeting unmet need and pressure meeting neighbouring authorities' needs
 - Place making areas, strategic allocations (housing) and policies (PL8 Rural Enfield and PL9 Crews Hill)
 - The economy including FEMA, projections for employment growth and retail growth
 - Special Area of Conservation (including Green Belt, Nature Conservation and Biodiversity, air quality and pollution)
 - Transport issues of cross border significanceAt present it is unclear from Enfield's published documentation whether there are any specific issues in relation to any of the above that you wish to bring to our attention, and we would be grateful for further clarification.
9. We note that the document is a 'Regulation 18' stage consultation. We will comment on any changes at Regulation 19 stage.