



**REPRESENTATIONS OF HERTFORDSHIRE COUNTY COUNCIL (HCC)
GROWTH & INFRASTRUCTURE UNIT**

ON BEHALF OF HCC (excluding HCC Property)

**IN RELATION TO THE
NEW ENFIELD LOCAL PLAN CONSULTATION**

SEPTEMBER 2021

1.0 Summary

- 1.1 This representation is made by Hertfordshire County Council's (HCC) Growth & Infrastructure Unit, in relation to the Borough of Enfield Local Plan Consultation. The comments within this representation reflect the interests of the following services that are provided by HCC, along with other relevant areas within the Environment & Infrastructure Department (excluding HCC Property):
- Highways & Transport (HCC as Highways Authority)
 - Sustainable Hertfordshire
 - General Planning Comments
- 1.2 Comments from the above listed HCC services and other relevant areas within the Environment & Infrastructure Department are stated in the following sections throughout this representation. It should be noted that comments have only been made on the parts of the document that are of relevance to HCC.

2.0 Highways & Transport

Introduction

- 2.1 The Enfield Local Plan very much aligns with Hertfordshire County Council's Local Transport Plan (LTP4) and the forthcoming South Eastern Area Growth and Transport Plan. We are pleased Enfield, like ourselves, and the wider Mayor's Transport Strategy are making commitments to promoting sustainable transport as the first option, rather than a continuation of predict and provide planning that has led to car-dominated and unsustainable development.

Strategic Objectives

- 2.2 **Objective 6** – HCC fully supports this objective to commit to delivering sustainable travel routes, as this aligns with our principles set in LTP4.

Strategic Policies – Places

- 2.3 **Policy PL1** – HCC supports Enfield's commitment to improving the accessibility in Enfield Town. This will be key to ensuring the ambitious modal share target for sustainable transport is met. We also agree with Enfield committing to high density development around transport infrastructure and key gateways as this can be an effective means to encourage sustainable travel.
- 2.4 **Policy PL2** – HCC welcomes Enfield's commitment to sustainable transport in this policy, however we would make the following comments:

- We would suggest some consideration needs to be given to reducing severance and improving safety at key junctions (such as the A10/A110) to ensure it is utilised.
- We also need assurance that this does not have severe knock-on effects north on the A10 in areas such as Broxbourne, which already have air quality issues related to traffic congestion.
- Public transport seems to have not been given the same level of commitment as in other policies and areas. It should not be neglected despite the downturn in usage created by the COVID-19 pandemic.

2.5 **Policy PL3** – HCC fully supports Enfield’s ambition for sustainable transport in Edmonton Green. We also welcome the recognition that car-free developments could be implemented here.

2.6 **Policy PL4** – HCC again supports this policy in committing to delivering sustainable transport improvements. As per our comments on PL2 though, further commitment could be given for public transport.

2.7 **Policy PL5** – HCC would suggest that further thought could be given to delivering sustainable transport connections to the Lea Valley, recognising that is an important asset as both a north-south corridor and green space.

2.8 **Policy PL6** – HCC would suggest whilst commitment to improving the pedestrian environment is positive, more commitment could be provided to cycling infrastructure (including parking) despite this area being smaller than others.

2.9 **Policy PL7** – HCC fully supports this policy.

2.10 **Policy PL8** – HCC fully supports Enfield’s recognition of the contribution active travel routes can have even in rural settings. Further consideration for improving public transport could be explored.

2.11 **Policy PL9** – HCC supports this policy, however we require some assurance from Enfield that the creation of additional highway capacity and any roadspace reallocation does not impact on our network across the border. In particular, Cattlegate Road and Burntfarm Ride are currently not of a standard to support

significant increases in vehicular traffic, and would likely need support if road space is reallocated in the Crews Hill Area.

- 2.12 **Policy PL10** – HCC fully supports this policy and welcomes Enfield’s commitment to all modes of sustainable travel.

Strategic Policies – Sustainable Enfield

- 2.13 **Policy SE1** – HCC would suggest a positive addition to this policy would be some thought to how sustainable transport can contribute to the climate emergency and decarbonisation through new developments.

Strategic Policies – Addressing equality and improving health and wellbeing

- 2.14 **Policy SC1** – HCC welcomes Enfield’s recognition of sustainable transport to achieve healthier lifestyles.

Strategic Policies – Blue and green Enfield

- 2.15 **Policy BG5** – HCC are concerned about the commitment to parking provision in this policy. This seems contrary to the commitment to sustainable transport set in other policies, and the aim of achieving 80% sustainable modal share.

Strategic Policies – Design and character

- 2.16 **Policy DE1** – HCC fully supports this policy, and welcome Enfield’s prioritisation of people over private vehicles. This very much aligns to our vision in LTP4.
- 2.17 **Policy DE7** - HCC fully supports this policy. A positive addition may be to provide further consideration for public transport, particularly with regard to creation of safe and accessible routes.
- 2.18 **Policy DE8** – HCC fully supports this policy in enabling businesses to promote a shift to sustainable travel amongst their staff.

Strategic Policies – Town centres and high streets

- 2.19 **Policy TC1** – HCC would suggest a positive addition to this could be improvements to active and public transport links to high streets to promote their usage.
- 2.20 **Policy TC2** – As per our comments above on Policy TC1, HCC would suggest a positive addition to this could be improvements to active and public transport links to high streets to promote their usage, including for the night-time economy.
- 2.21 **Policy TC6** – HCC welcomes Enfield’s consideration for mitigating against additional car usage.

Strategic Policies – Rural Enfield

- 2.22 **Policy RE2** – HCC fully supports this policy and welcomes Enfield’s focus on access through active travel. We would suggest however that the contribution to access to rural areas that can be provided by public transport should not be neglected.
- 2.23 **Policy RE3** – HCC supports Enfield stipulating an avoidance of significant increases in number of vehicular trips.

Strategic Policies – Movement & Connectivity

- 2.24 **Policy T1** – HCC fully supports the ambition of Enfield on this policy and are positive of the commitment being made to supporting sustainable transport in relation to growth. This is similar to the approach being taken by HCC in the development of our Growth and Transport Plans, which support our Local Transport Plan (LTP4). As suggestions, we would encourage Enfield to strengthen this policy through an amendment to 1c, with the addition of committing to improving public transport, and to 2 through more focus on what Enfield is seeking to deliver on active travel.
- 2.25 **Policy T2** – HCC fully support this policy, as this aligns with our principles outlined in LTP4. We also fully support Enfield’s aspiration to exceed minimum standards, which can often be insufficient to readily support uptake of cycling. HCC would also

suggest a commitment may need to be given here to aiming to deliver to LTN 1/20 standard for cycling infrastructure, to avoid substandard facilities.

Site allocations

- 2.26 **Site SA52** – HCC requires some assurance from Enfield through the planning process that this site does not severely impact on the strategic transport network across the border in Hertfordshire – namely the A10, M25 and rail lines. This is particularly pertinent as this site is intended to be primarily industrial, and therefore is likely to create significant numbers of HGV movements which cannot easily be mitigated for.
- 2.27 **Site SA54** – HCC requires some assurance from Enfield through the planning process that this site does not severely impact on the strategic transport network across the border in Hertfordshire – namely the M25 and B556. This is particularly pertinent as this site is intended to be primarily industrial, and therefore is likely to create significant numbers of HGV movements which cannot easily be mitigated for.
- 2.28 **Site SA55** – HCC requires some assurance from Enfield through the planning process that this site does not severely impact on the strategic transport network across the border in Hertfordshire – namely the A10, M25 and rail lines. This is particularly pertinent as this site is intended to be primarily industrial, and therefore is likely to create significant numbers of HGV movements which cannot easily be mitigated for.

3.0 Sustainable Hertfordshire

- 3.1 HCC welcome a very good and detailed plan for the sustainability actions. HCC also welcome the inclusion and consideration of sustainable design, construction and low carbon development that clearly thinks about current and future resources.

4.0 General Planning Comments

- 4.1 HCC would like to ensure that sufficient infrastructure services are planned for within the borough of Enfield to provide for the medium growth option which has been selected of up to 25,000 homes.

- 4.2 The Draft Infrastructure Delivery Plan is noted as a document to guide infrastructure provision, identifying the different types of infrastructure that will be required to meet future growth needs of Enfield, along with delivery and phasing, which will be further developed during the next stage of Local Plan production. As a service provider within Hertfordshire, the county council would be keen to engage in discussions regarding infrastructure projects particularly those close to the administrative border.
- 4.3 It is noted that the proposed rural place making area of Crews Hill as outlined in Policy PL9, is close to the border with Welwyn Hatfield Borough Council (WHBC) and Hertsmere Borough Council (HBC) and an SPD is proposed for the masterplanning of the whole area. This is welcomed and HCC would like to work with Enfield council in the development of this where necessary. Similarly, HCC would like to be involved in the stakeholder masterplanning, particularly in case there is any school provision to be utilised within Hertfordshire by developments in Enfield.
- 4.4 From an education perspective, it is accepted that there is an element of cross boundary movement of children across administrative borders, especially at secondary school age where children travel further to school. However, Hertfordshire in its capacity as education authority is working hard to ensure there are sufficient school places to support the development within the county and as such would not be able to accommodate significant numbers of influx into the county.
- 4.5 Enfield council should be mindful of the emerging WHBC Local Plan which has yet to be adopted. HCC has worked endlessly with WHBC in relation to education provision to ensure strategies are in place to maintain the service provision with additional growth proposed in their area. With additional growth potentially in Crews Hill planned through the Local Plan or as windfall development, HCC would be keen to engage in consultations in relation to education to identify any education demands and strategies to manage this and ensure sufficient capacity within schools and any mitigation measures required by the education authority. This is particularly important in relation to Cuffley which is one of the nearest towns to Crews Hill, where primary school mitigation for the additional growth planned in WHBC is expected to be pushed to its uppermost limit.

- 4.6 HCC is aware that WHBC are expecting to provide a representation to the consultation document. It is important to emphasise that HCC would seek to work alongside WHBC to work together to safeguard the service improvements that have been negotiated to accommodate increased growth within WHBC.
- 4.7 In addition, Enfield council should be mindful of pressures on other HCC services separate to education which may be caused by the proposed development in the borough of Enfield, including childcare, libraries, youth and waste. Services cannot be sustained at a strained capacity where there may be an influx of users from outside of the county. The concern is real given the proximity of the development at Crews Hill to the services delivered in WHBC.

Ends