

Core Strategy Issues and Options and Preferred Options: Statement of Consultation

APPENDICES VOLUME II

Copy of all written representations

H – Issues and Options

I – Preferred Options

J – Strategic Growth Areas



Appendix H – Issues and Options Report: All written representations (in document order)

Document Section	Section Number or Question	Name	Organisation	Response
General comments on document		Mr Tony Watts	ECEN Representative Over 50s Forum	I welcome the Enfield Plan as a real step forward in considering how the Borough should develop. The triple arc concept seems a reasonable approach in considering area developments. However I think it would be more appropriate to rename the three areas. In particular the calling the centre arc 'The Heart of Enfield' may to many imply a marginalization of the 'New Enfield' arc and prove a barrier to the adoption of the plan. My suggestions would be along the lines of the Central Arc, the Outer or Regeneration Arc and the 'Green Belt Arc'. Perhaps the sub head for the Plan could be Green Enfield's Choices as compared to many London Boroughs it is a green Borough with green spaces throughout.
General comments on document		Mr Ian White	Senior Planning Officer Epping Forest District Council	No comments to make, but would appreciate being consulted on the future stages.
General comments on document		Mrs Elizabeth Henthorn		Overall in agreement with the plan. More industry is required for jobs and less retail sites needed.
General comments on document		Mrs Irene Stone	Southgate District Civic Trust	Report considered to be very comprehensive but concern raised that it is not attainable or realistic. Issues may not be achievable due to factors outside the Council's control for example- legal issues, appeal decisions, availability of finance, political/ legislative constraints.
		Dwyer Asset Management plc	c/o Agent for Dwyer Asset Management plc	<p>We are instructed by our client Dwyer Asset Management plc, asset manager for the clients that own the BOC site, to submit the following representations in relation to the Core Strategy Issues and Options Report.</p> <p>a) Employment (Chapter 9)</p> <p>Paragraph 9.5 puts forward seven questions with regard to the employment issues. We firstly set out our response to these questions and then provide a General Statement with regard to employment development in the Borough in relation to the questions.</p> <p>i) Question 29 We consider that mixed-use and more intensive development should be promoted as a general Borough-wide policy on employment land and thus support Option 1.</p> <p>ii) Question 30 The first part of Question 30 is not a question but a statement, namely: - The new Plan will set out the detailed boundaries of the Borough's Strategic Employment Locations. This is a requirement in the original London Plan (2004) and the latest alterations (2007).</p> <p>iii) Question 31 The Plan should not define and protect the best employment sites outside the</p>

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				<p>Strategic Employment Locations as this is unnecessary in the light of the amount of vacant employment land and could result in sites being sterilised that could be used for other essential development.</p> <p>iv) Question 32 No comment.</p> <p>v) Question 33 No comment.</p> <p>vi) Question 34 No comment.</p> <p>vii) Question 35 The new Plan can help develop the skills and employment opportunities of local people by applying a broader definition of employment and not restricting it to B1, B2 and B8 uses which are generally in decline.</p> <p>b) General Statement</p> <p>i) The approach in the Plan to Industrial Capacity.</p> <p>The policies and proposals with regard to this matter in the Issues and Options Report have evolved principally as a result of the Enfield Employment Land Study-Final Report carried out by Halcrow's on behalf of the council in December 2006. We consider that the approach taken is now out of date and that a more holistic approach is requires that needs to include regeneration considerations. This matter is dealt with below.</p> <p>The Employment Chapter (9) of the Issues and Options Consultation Report seeks to balance the demand and supply of land for employment uses over the Plan Period in accordance with the findings of the Halcrow Report. It also refers to the Mayor's guidance on industrial capacity in the draft Supplementary Planning Guidance produced by the GLA in 2003 and on the report prepared by Roger Tym and Partners for the GLA in 2005.</p> <p>The Halcrow Report took the conventional step-by-step approach to determine the demand and supply of employment land. It firstly surveyed the amount of available land in the Borough. It then assumed that 10% vacancy should be maintained which is the national average, to allow for the effect of the operation on the market. On this basis there is a surplus of 32 hectares of land in the London Borough of Enfield.</p> <p>The next step is to seek to assess the structural demand for additional employment land within the Plan period which is up to 2016. This is done by contacting employers to ask them what their aspirations are for the future and then applying a range of density figures in order to arrive at a range of employment land requirements for the Plan period. Their estimate is between 11-15</p>

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				<p>hectares (2001-2016) or 26-31 hectares (2005-2016). This would thus leave a total surplus of employment land requirement that could be released between 2005 and 2016 of only 1 to 6 hectares.</p> <p>The trends shown in the Halcrow report are very different from those being shown in the latest employment land reports. The study carried out by Roger Tym and Partners for the GLA (2004) found that 100 hectares (net) of industrial land could be released to other uses in North London from 2001-2016 (Paragraph 22.2 of the Executive Summary). The latest report produced by the URS Corporation Ltd for the GLA (April 2007) advises the release for North London of 207 hectares between 2001 and 2016; and 103 hectares between 2006 and 2016. This is a substantial increase on the Roger Tym Report. Thus the trend predicted by the latest URS Report is entirely different to that predicted by the Halcrow Report and envisages a considerably greater release of land in the area. The main point, with regard to these figures is how sensitive they are to different minor inputs.</p> <p>The high sensitivity of these figures is recognised in the Halcrow Report, which states in the Executive Summary:</p> <p>'With regards to demand, the forecast for employment land is subject to a high level of sensitivity, reliant as they are on employment forecasting data, employment density and plot ratios.'</p> <p>The reason for this sensitivity relates to a number of factors.</p> <p>Firstly, it relies on employment occupiers predicting their requirements 11 years ahead. This in effect is a wish list, the operator may be optimistic and even if their plans are currently realistic they could change dramatically if, for example, there was a downturn in the economy.</p> <p>Secondly, employers may decide to make more efficient use of their current floorspace instead of moving to new premises.</p> <p>Thirdly, it takes no account of factories becoming vacant in the future.</p> <p>Fourthly, much of the recent take up has been by speculative industrial developers, which does not demonstrate actual demand by employers. It also takes no account of land being bought for other uses or for investment purposes. For example there is a quote in another Halcrow Report that the purchase of the BOC site by my client demonstrated demand by employers. This is not correct as the land was purchased to provide a mixed use development as set out below. The same point could be applied to the additional operational land acquired by IKEA surrounding their store at Edmonton.</p> <p>By using the Halcrow figures, which are the most pessimistic, the Consultation Report therefore</p>

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				<p>comes up with the conclusion that there is very limited scope for further employment land release.</p> <p>This has implications for Question 29, which is based on the assumption that there will only be a release of between one and six hectares of employment land in the period up to 2016. The likelihood is that there will be a requirement to release a considerably larger area of employment land to other uses and this goes to the argument of using employment land to satisfy the strong demand for housing and other uses.</p> <p>With regard to Question 30, the difference in figures goes to how the detailed boundaries of the Borough's Strategic Employment Locations should be dealt with when they are reviewed and that a more flexible approach can be taken with regard to uses on these sites.</p> <p>ii) Change in Employment Land Occupiers</p> <p>Apart from the unreliability of these figures they also mask the dramatic change in the type of occupier of employment land.</p> <p>The Halcrow Report states that Enfield has seen a huge decline in the true manufacturing industries over the last decade. This is a natural trend, which Halcrow accepts is probably irreversible. It then goes on to state that: -</p> <p>'In the Borough however the gap in employment terms has been largely filled by the trend for business diversification into distribution, repackaging and service sector.'</p> <p>Clearly, part of the rationale of the Employment Chapter is to provide employment for the occupants of the Borough. What is clear is that a large amount of employment land is being taken by operators with low or very low employment densities and therefore the original rationale of keeping employment land for manufacturing employers is no longer realistic.</p> <p>The Borough should now be taking a more holistic approach to their employment land. Employment land can make an important contribution to mixed-use development, which is promoted both in national and GLA guidance and it can also make a major contribution to regeneration aims. Furthermore, it can provide employment outside the B1, B2 and B8 categories, for example in retailing, education, healthcare, and the service sector.</p> <p>iii) Site Allocations</p> <p>Another issue of inconsistency is with regard to the allocations within which the employment sites fall. In the Halcrow report the BOC site falls within the area that is allocated under EN009/EN014/EN026 – Meridian Way Land/Glover Drive/Kimberley Road. The BOC site is allocated within the</p>

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				<p>Glover Drive area which is allocated as a local employment area which has a subsidiary status below prime employment area. However, although it is not a prime employment area it is still currently allocated as part of the Strategic Leaside Business Area.</p> <p>The part of the Central Leaside Business Area that lies to the east of Meridian Way is predominantly within retail use and no longer retains the image of an industrial area. The site is a very prominent location adjoining the North Circular and has been previously developed on an ad-hoc basis. It is clearly in need of urban regeneration and improvement and requires development that can bring together all of the existing land uses into a comprehensive whole and provide better communications between the uses and substantially upgrade the appearance of the area. Furthermore, the accessibility to the area needs to be substantially improved as once again it has grown on an ad-hoc basis and the present accessibility is clearly unsatisfactory. A mixed-use regeneration scheme for a substantial part of this area would be able to provide these essential elements and create a vibrant and attractive environment for the area. The development of the site for single employment use would not create a vibrant environment as envisaged by PPS1 and the opportunity should be taken to deliver a mixed-use scheme, including employment and other uses.</p> <p>Accordingly, the part of the Central Leaside Business Area to the south of Angel Road and to the east of Meridian Way should be removed from the Strategic Employment Allocations of the Leaside Business Area.</p> <p>We appreciate that this is a matter that will also be looked at in future versions of the Plan and with regard to the proposed Action Area Plan for the Leaside Business Area. Our client, Dwyer, has been in detailed negotiations with both the Local Planning Authority and with economic groups in the area to produce a viable solution for the area and to produce major regeneration benefits. This is referred to in the findings of the Halcrow Study which states: -</p> <p>'The area is considered unsuitable for a change of planning use unless a significant master plan can be drawn up which, given Ikea's recent development, is probably unviable'.</p> <p>Having examined this matter in detail, it has been found that the location of Ikea site can be brought in to a viable master plan that will provide major regeneration benefits for the area in a mixed-use scheme.</p> <p>It is therefore critical that the employment policies in the LDF take a more holistic view of the benefits of developing employment land for mixed-use and regeneration purposes.</p>
General comments on document		Mr Giles Dolphin	Planning Decisions Manager	It is important to note in drafting the preferred options for the Core Strategy and the Area Action Plan that Local Development Documents must be in general conformity with the London Plan under the Planning and Compulsory Purchase Act 2004 (section 24 (1b)).

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			Greater London Authority	
General comments on document		Dr Chris Jephcott	President The Enfield Society	We support Triple arc concept but find the actual terms 'New Enfield' and 'Heart of Enfield' somewhat divisive. We suggest a further Key Issue needing to be addressed 'Need for good design in all aspects of the Borough's development'. Also in Background 2.1.1, surely the overarching approach should deliver economic social and environmental wellbeing.
General comments on document		Mr Chris Baker	Government Office for London	I provided comments in mid March on a pre-publication draft of the Core Strategy Issue and Options. As the published version appears to be largely the same, I attach those comments as our response now. I appreciate that it would have been difficult to have made major drafting changes prior to publication, but some of the major points I have raised will need to be addressed when the DPD reaches preferred options stage. As PINS examines more plans, the experience it provides has shown that the key tests of a sound core strategy are: a clear strategy providing the spatial expression of the community strategy, local distinctiveness (ie. the plan deals with issues/matters that are specific to Enfield) and an avoidance of repetition of regional and national policy. We are, of course happy to meet you at any time to discuss issues arising out of our comments. We did not see a copy of the Enfield Town Plan at the draft stage, but, in general terms, we have no substantive comments at this stage.
General comments on document		Mr Chris Baker	Government Office for London	A matter coming out of the first examinations is that LDFs and Core Strategies in particular should move away from the Local Plan/UDP approach of mainly providing a DC framework. They should be more focussed on implementation of proposals. The DC policies DPD is the basis for the control mechanism. However, the Core Strategy Issues and Options draft document is extensive and does seem to contain in large part of matters that are best left to the DC DPD. PINS are clear that it is not really for the Core Strategy to provide the policies restricting development generally or in specific localities. Some of this protection will already be contained in national or regional policy and the expectation is that this would simply be supplemented by the borough's "limited suite of DC policies" (PPS12) in the DC DPD. Linked to the previous point is the need to ensure that the Core Strategy is a relatively short and clearly focussed document and not one contain a large number of policies. [See the model core strategy advice now on the PAS website]. The impression from the range of topics covered here is that your Core Strategy would be extensive.
General comments on document		Ms Claire Martin	Policy Officer Lee Valley Regional Park Authority	The Authority supports the Council's approach to preparing the Core Strategy and the way it is working to develop a spatial vision for the Borough. However the Lee Valley Regional Park and its Authority should be identified as playing a strategic role in Enfield today. The Authority would like the Council to consider the following additional issue as part of its approach to the Core Strategy - How can Enfield residents and others benefit from the Lee Valley Regional Park and its strategic aims of providing a regional focus for sport, recreation, leisure and nature conservation that stretches from the Thames to Ware in Hertfordshire?

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General comments on document		Mr Patrick Blake	Network Strategy Highways Agency	Amongst its activities, the HA is responsible for considering the potential impact on the network of proposals for new developments. It will remain important for the Local Planning Authority to ensure its LDF proposals are evidence-based and deliverable. In assessing the interaction of the LDF proposals with the SRN, attention should be paid to the advice set out in Chapter 5 of the DfT Guidance on Transport Assessment (TA). To assist you in applying this document (and Circular 2/2007) the HA has also produced a short advice note about evaluating the transport impacts of LDF proposals, which we hope will be of assistance in the production of Local Development documents (LDD). Two major road improvement schemes are planned in close proximity to Enfield Borough, the M25 widening scheme between junctions 23 and 27, and the combined M25 Holmesdale Tunnel Refurbishment and M25 Junction 25 Improvements. Both schemes are within the Targeted Programme of Improvements.
General comments on document		Mr Glenn Stewart	Assistant Director of Public Health Enfield Primary Care Trust	Health Improvement welcomes The Enfield Plan and the contribution it will make to the future development of Enfield. It particularly welcomes that one of the key issues to be dealt with by the plan is that of addressing inequalities in health conditions and to improve life-expectancy in Upper Edmonton, Lower Edmonton, Ponders End and Southbury.
General comments on document		Mr Alex Andrews	Principal Planner Transport for London	All Local Development Framework documents produced in London should be in general conformity with the London Plan, Sub Regional Development Framework and the Mayors Transport Strategy. TfL broadly supports the principal aims of the Core Strategy Preferred Option but questions whether the document could provide more detail and more comprehensive guidance on future development in the borough. TfL understands that it is not the intention of the strategy to necessarily prescribe the nature of future development but it could better set down the parameters for measuring and implementing future development with regard to transport capacity and need.
General comments on document		Ms Jill McGregor (GL Hearn)	Tesco Stores Ltd	Tesco would recommend that the Council introduce a town centre policy and/or supporting paragraph in Part 3 setting out a strategy for delivering strengthened town centres and improved leisure, shopping and public services along the Lee Valley. Tesco would recommend that the Council introduce a town centre policy and/or supporting paragraph in Part 4 setting out a strategy for delivering strategic objective 19 for enhancing and strengthening Enfield's town centres and supporting the growth of the service sector economy.
General comments on document		Dave Martin	ECEN Chair Enfield Community Empowerment Network (ECEN)	Summary: In the context of PPS1, our concern is that there has been insufficient attention to the social cohesion element of the sustainable communities agenda. In particular, there does not appear to be a Planning Obligations/S106 Supplementary Planning Document (SPD). Such a document could set out clear guidelines for the negotiation of Planning Obligations/S106 Contributions on individual applications. This will help to ensure that private sector contributions to social infrastructure and community facilities, arising from development activity, will be maximised. We would like to ensure that the voluntary sector is integrally involved, alongside other stakeholders, in the process of working out the priorities for S106 funding.
How to get involved		Mr Norman Smith	Coombehurst Close Residents Association	Period given for consultation is too short and the document is too long. Concern raised that consultation is not taken seriously and discourages comments. Concern that the document contains leading questions with guidance to intended answers.

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Context	1	Mr Chris Baker	Government Office for London	Chapter 1 does provide a fairly clear idea of the overall approach to how the Council see the borough changing over the next 10-15 years. It is important, however, to show clearly how this strategy links with the Community Strategy. Not only should there be some information on this in Chapter 1, but the information in Appendix 1 is very brief and doesn't really show how the Triple Arc concept flows from the Community Strategy. I appreciate that the Community Strategy probably contains very generalised objectives, but it is important that a clear link can be identified.
What sort of future do we want to see for Enfield?	1.1	Dr Chris Jephcott	President The Enfield Society	This is no worse than the usual collection of adjectives cobbled together in these circumstances to create a positive sounding slogan. We would hardly wish to create the opposite,
What sort of future do we want to see for Enfield?	1.1	Dr Frederic Clark	Hon. Secretary Trent Park Conservation Areas Advisory Committee	1.1.2 Not all groups were consulted by The Partnership (amongst them our Committee)
What sort of future do we want to see for Enfield?	1.1	Mr Alexander		The Partnership did not consult at least some Conservation Committees and Residents Associations
What we already know	1.3	Mr Alex Andrews	Principal Planner Transport for London	Support reference to TfL, London Plan and Mayoral strategies.
What Directions for Enfield?	2	Mr Chris Baker	Government Office for London	Experience from the first examinations shows it is crucial that the strategy for each local authority is locally distinctive and does not simply reiterate a wish list of objectives/policies that exist at national or regional level. Although it is necessary to take account of the objectives in the Community Strategy, the LDF should contain an analysis of the local problems, pressures and challenges facing the borough and then provide realistic options in terms of the local solutions to deal with them. Given this, the scene setting should make clear not just what are the drivers for change, but also the main problems the borough faces and which the LDF will address. The key issues set out in Section 2 are in large part a wish list that could apply to most local authorities (eg, develop skills, address child poverty and promote social cohesion). I understand that this is the Issues and Options stage and that there will be a good deal of scene setting that can be deleted later on, but the key issues should be the main problems (as mentioned above) facing the borough for which the LDF can be instrumental in providing solutions (and show how they will be implemented and monitored). The only ones in the list that might qualify in this way are 9-12, which deal with specific local inequalities in education, unemployment and health etc. and for which the Strategy can provide specific policies and proposals to address.

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Background	2.1	Mr Peter O'Brien	Partnership Manager Learning Skills Council	While the triple arc concept has many virtues, we must all ensure that the urgent need for intervention in south-east Enfield and the wards / neighbourhoods contained there is prioritised.
Background	2.1	Dr Chris Jephcott	President The Enfield Society	2.1.1. Surely the overarching approach should deliver economic, social and environmental wellbeing.
Key Drivers of Change	2.2	Mr Alan Melhuish	Advocate	Para 2.2.5 - Environmental Imperatives. The two objectives outlined in the two sentences are incompatible. Larger footprints of new development using up more of the soft green landscape of existing developments alters the character of a neighbourhood changing it from one that is suburban in nature to a more intensely developed inner city type urban setting which has an absence of green space.
Key Drivers of Change	2.2	Mr Alan Melhuish	Advocate	Para 2.2.6 "Economic Growth. Evaluations of the impact of the growth in the Hertfordshire" Bedfordshire - Cambridge sub region particularly in transport passing through the borough should be assessed as is directed by Government. A study of how new jobs may be created on the back of growth in that area should be assessed and specific measures over how to capitalise of the business- finance growth projections. Are responses from Business Link and Enfield Enterprise Agency being canvassed ?
Key Drivers of Change	2.2	Mr Peter O'Brien	Partnership Manager Learning Skills Council	With regard to paragraph 2.2.3, the concept of "importing deprivation" is a widespread anecdote within the Borough and it would be interesting to know upon what evidence it is based.
Key Drivers of Change	2.2	Mr Mark Hayes	The Chair Enfield Housing Association Forum	2.2.4 Social Cohesion: Care needs to be taken that "the Triple Arc" approach does not work against the promotion of social cohesion by stigmatising some parts of the Borough. It is a valid, and in many ways helpful, descriptor of the varying planning pressures, strengths and opportunities in the Borough, but is open to misinterpretation in a way that could be divisive
Key Drivers of Change	2.2	Mr Alexander		"Potentially enormous impact of climate change" - not so for Enfield
Key Drivers of Change	2.2	Mr Alex Andrews	Principal Planner Transport for London	Support reference to climate change and protection of natural resources. Under the heading "environmental imperatives", the document should make reference to the importance of public transport and reduction in reliance on the private motor car (this is also linked to social inclusion and economic growth.
Key Issues	2.3	Mr Alan Melhuish	Advocate	Para. 2.3 Key Issues: add measures needed to promote employment growth using inward investment initiatives. After the miserable failure of Innova Park Science Park, business cannot be expected to be effective acting on its own. Does it need better buildings, technological provision, access to relevant employment skills base coming out of schools ,colleges or migration into the borough or what ? Strategies need fleshing out.
Key Issues	2.3	Mr Peter O'Brien	Partnership Manager Learning Skills Council	For purposes of clarity, we think that point 7 in the key issues to be addressed should be "Develop the education, learning and skills of local people"

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Key Issues	2.3	Mr Mark Hayes	The Chair Enfield Housing Association Forum	Key issue 5 should state clearly the need for affordable rented homes, as the term "affordable" also describes home ownership initiatives. The need is for a balanced provision of affordable homes, with an emphasis on rented housing, particularly for families
Key Issues	2.3	Ms Karen Foster-	Planning Liaison Officer Environment Agency	Water quality should be added to this list as a key issue affecting Enfield as will be discussed later in our response. Flood Risk is an important issue for Enfield and as such should be given due recognition here.
Key Issues	2.3	Mr Donald Alexander	Hon Secretary Chalk Lane Area Residents' Association	2.3.1 Add as a key issue "Improve traffic flow and reduce traffic congestion". Add to "strengthen Enfield's town centres" the phrase "without significant damage to local shopping centres such as Cockfosters and without increasing traffic congestion in the town centres and major through routes"
Key Issues	2.3	Ms Georgie Cook	Town Planning Administrator Thames Water Property Services	Thames Water welcomes the Key Issues to be addressed in the Plan, including specifically those relating to environmental issues and biodiversity. However we do consider that an additional Key Issue should be included to reflect the importance of delivering growth alongside the infrastructure it requires. We suggest the following additional key Issue:- ensuring development is brought forward in line with the required infrastructure. This additional Key Issue will reinforce the importance of delivering growth in a sustainable fashion; having regard to infrastructure that will be required to be delivered alongside it.
Key Issues	2.3	Mr Alexander		Add as an additional key issue "Improve traffic flow and reduce traffic congestion" Add to "strengthen Enfield's town centres" the phrase "subject to (a) not inflicting significant damage to shopping centres such as Oakwood and Cockfosters, (b) without increasing traffic congestion at the town centres, and (c) not further impeding traffic flow on the main east-west through traffic routes"
Key Issues	2.3	Chief Inspector Stuart Palmer	Police Partnerships Metropolitan Police	Note page 5 (P5) bullets 18 to address crime. I know they are not in order but I would like to see it nearer the top to reflect the public's priority of reducing crime in the borough (public consultation event July 06.)
Key Issues	2.3	Mr Alex Andrews	Principal Planner Transport for London	TfL supports reference to the borough's strategic corridors. However under key issues addressed by the LDF, TfL requests that the objectives involving linkages and movements are merged. In addition sustainable public transport must be given more emphasis within the key issues, by promoting travel choice, linking development with transport infrastructure and reducing reliance on the private motor car. There should also be a greater emphasis on walking and cycling.
	Key issues to be addressed by the Plan	Mr Tony Watts	ECEN Representative Over 50s Forum	Key Issues are valid. Perhaps issues such as safety for cyclists, congestion and parking could be included

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The Triple Arc	2.4	Mr Tony Watts	ECEN Representative Over 50s Forum	As per previous comment Triple Arc concept is reasonable . Suggest renaming Arcs to Green Belt Enfield, Central/Middle Enfield and Outer/Regeneration Enfield
The Triple Arc	2.4	Mr Peter O'Brien	Partnership Manager Learning Skills Council	It is unfortunate that the description of the three characteristics of the Borough has been accompanied by a map. We hold with the concept, but do not think it is helpful to associate it with specific areas of the Borough as the map tends to skew perception away from the idea that the features of all three characteristics are present in all parts of the Borough. We should also consider whether map clearly enough identifies that the condition of the area in the south-east of the Borough is of sufficient concern to merit separate description as an 'opportunity' area that will be the focus of significant and urgent intervention and investment.
The Triple Arc	2.4	Mr Mark Hayes	The Chair Enfield Housing Association Forum	Care should be taken to avoid "the Triple Arc" being seen to stigmatise different parts of the Borough.
The Triple Arc	2.4	Mr Diane Millis	Regional Policy Officer The Woodland Trust	The Trust supports the Triple Arc Strategic Objective and is particularly pleased to see the protection and enhancement of ancient woodlands where it should be, high up on the priority list. The precise boundary of the area known as Green Enfield is somewhat ambiguous and we would prefer that protection all ancient woodland is included either in this section or as appropriate in the other two Triple Arc areas. To help with this I include a map (Map 1) taken from the Ancient Woodland Inventory (Provisional) for reference. We would further like the council to note that under Planning Policy Statement 9 (PPS9) on Biodiversity and Geological Conservation the council is under a duty to take undertake the following, Ancient woodland is a valuable biodiversity resource both for the diversity of species and for its longevity as woodland. Once lost it cannot be recreated. Local planning authorities should identify any areas of ancient woodland in their areas that do not have statutory protection (e.g. as an SASSY). They should not grant planning permission for any developments that would result in its loss or deterioration (ODOM, PPS9, 2005, paragraph 10). This clearly indicates that any ancient woodland should be recorded and protected. The Ancient Woodland Inventory currently only identifies ancient woodland over 2 hectares in size.
The Triple Arc	2.4	Chief Inspector Stuart Palmer	Police Partnerships Metropolitan Police	I like the triple arc model. I know some people of knocked it but it provides a sound basis for the strategy. I would change the names as follows: Green Enfield New Enfield Improving Enfield Heart of Enfield
The Triple Arc	2.4	Mr Glenn Stewart	Assistant Director of Public Health Enfield Primary Care Trust	There may be two issues with the concept of the Triple Arc. Firstly that it may be seen as divisive and as separating different populations and geographic areas of Enfield from one another. Secondly, there are issues that the Enfield Plan seems to want addressed by arcs which really need to be addressed at a borough level. For instance, here the need to address climate change seems to be focused on Green Enfield where emissions are already likely to be lower than elsewhere in the borough. It is where CO2 is produced that action needs to be taken.

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Strategic Objectives	2.5	Mr Peter O'Brien	Partnership Manager Learning Skills Council	With regard to points 8 and 9, it is not sufficient just to increase the access to and participation in education, nor to reduce inequalities in educational attainment, but to ensure a diverse range of excellent provision that enables Enfield residents to achieve their potential and maximises their contribution to society and the economy
Strategic Objectives	2.5	Mr Mark Hayes	The Chair Enfield Housing Association Forum	The strategic objectives appear to restrict the provision of affordable housing to "New Enfield". Whilst this is the area of greatest opportunity, it should be made clear that balanced communities throughout the Borough require a proportion of affordable housing. When referring to affordable housing, the need for this to include a significant proportion of rented housing should be stated
Strategic Objectives	2.5	Mr Donald Alexander	Hon Secretary Chalk Lane Area Residents' Association	2.5.1 Point No.19: (a) Add to "strengthen Enfield's town centres" the phrase "without significant damage to local shopping centres such as Cockfosters and without increasing traffic congestion in the town centres and major through routes"(b) there should be a strategic objective to reduce traffic congestion throughout the Borough
Strategic Objectives	2.5	Ms Georgie Cook	Town Planning Administrator Thames Water Property Services	Although Thames Water agree that areas of biodiversity and open space should be protected and enhanced it should also be noted that sites such as William Girdling and King George V Reservoir are primarily essential infrastructure sites that ensure there is an adequate supply of water for London. These sites may require upgrading or improving to secure an adequate of supply of water for London in the long term. As such we request that Strategic Objectives 2 and 3 include the following text at the end of each of the two objectives:- '...Whilst taking into consideration the potential plans of organisations such as Thames Water in carrying out their statutory functions.
Strategic Objectives	2.5	Ms Karen Foster-	Planning Liaison Officer Environment Agency	Strategic objective 1 should to make reference to adapting to climate change. Environmental issues appear to be only dealt with in the Green Enfield area - the Triple Arc concept has fragmented the approach to the environment here. The issues mentioned in this section (including energy efficiency, flood risk management, sustainable use of natural resources, the provision of environmental infrastructure) should apply equally to all sections. A more appropriate way of including environmental issues would be to have a separate overarching environmental strategy, which can be applied across Enfield as a whole. Any variation in the 3 areas could be dealt with in the individual sections. In line with PPS25 Development and Flood Risk, Reducing Flood Risk should be included as a key strategic objective here.
Strategic Objectives	2.5	Mr Alexander		2.5.1 No.1: I believe we should only be "an exemplary Borough" on climate change where the benefits to the Borough outweigh the costs (or of course where Government mandates it) 2.5.1 No.2: Is the SSSI for King George V Reservoir only because birds of one species stop there while migrating? 2.5.1 No.19: Add to "strengthen Enfield's town centres" the phrase "subject to (a) not inflicting significant damage to shopping centres such as Oakwood and Cockfosters, (b) without increasing traffic congestion at the town centres, and (c) not further impeding traffic flow on the main east-west through traffic routes
Strategic Objectives	2.5	Chief Inspector Stuart Palmer	Police Partnerships Metropolitan Police	My view is that you must put a crime reduction strategic objective under new Enfield. This area has been a sustained hot spot for crime in Enfield over several years. The long term reduction of crime is closely linked to the deprivation in this area and we would want to work together in forming an objective. Something like 'To reduce crime and the fear of crime by working in partnership to reduce the long term causes of crime'.

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Strategic Objectives	2.5	Mr Alex Andrews	Principal Planner Transport for London	Under the heading green Enfield, a bullet point should be added which recognises the important of sustainable public transport and sustainable travel choice.
Your Views	2.6	Dr Chris Jephcott	President The Enfield Society	We support Triple Arc concept though find the terms 'New Enfield' and Heart of Enfield somewhat divisive. We suggest a further Key Issue needing to be addressed - 'Need for good design in all aspects of the Borough's development'. [text commenting on section 2.1.1 relocated as appropriate]
Your Views	2.6	Mr Alexander		Question: (a) the division of the Borough into three Sectors helps in some ways and for certain topics, but certain sections such as housing and Conservation Areas, apply across the whole Borough and should be available in a central section of the document (b) there should be a strategic objective to reduce traffic congestion throughout the Borough
Your Views	2.6	Dr Chris Jephcott	President The Enfield Society	I think our response EPS1 should have appeared here. Getting hang of this system
	Question 1	Mr Tony Watts	ECEN Representative Over 50s Forum	Rename arcs as previously commented
	Question 1	Mr Alan Melhuish	Advocate	Focus more attention on cultural provisions both as leisure pursuits and as educational and employment drivers. In focusing on enhancements of town centres, what provision is envisaged, retail 'offices' leisure 'hospitality' housing, needed to make a vibrant community as compared to current situations where town centres largely die in the evenings. On a sustainability perspective 'how to balance adverse impacts of increasing hard landscaping and more buildings on surface water run off and flooding. The rapid decline of green areas loses the permeable base into which rainwater can drain.
	Question 1	Mr Norman Smith	Coombehurst Close Residents Association	It is impossible to devise policies which would be equally applicable to the three main arcs- suggest that different policies are applied at ward level.
	Question 1	Mr Mark Hayes	The Chair Enfield Housing Association Forum	There needs to be a clear commitment to increasing the availability of affordable rented housing throughout the Borough.
	Question 1	Dr Frederic Clark	Hon. Secretary Trent Park Conservation Areas Advisory Committee	(a) The division of the Borough into three Sectors helps, but certain sections such as housing, transport, apply to all areas. For Trent Park, we now have to check the whole document to find if there are items that apply to us. This takes longer than if items like Conservation Areas were in a general section.
	Question 1	Mr Andrew Newman	Forty Hill and Bulls Cross Study Group	The triple arc is a too area specific concept for Core Strategy principles which should apply to all areas of the Borough. It seems more logical to split by strategy than by geography.

Document Section	Section Number or Question	Name	Organisation	Response
	Question 1	Ms Maureen Juliana-Harvey	ECEN Co-ordinator Enfield Community Empowerment Network	Participants indicated that they were generally unhappy about the Triple Arc concept
	Question 1	Mr Chris Baker	Government Office for London	Although the Triple Arc concept is understandable in terms of the character of the borough, I am not sure whether the section headings for each zone on the Arc map really apply to the zones as such. I appreciate that the document says the issues may also apply elsewhere in the borough and that some of the issues are more important in the zones, but it is confusing for all the issues such as environmental resources, green belt and sport etc. to be placed under the Green Enfield heading and then to provide a geographical basis to the heading. They are green issues, but they surely relate equally to the whole of the borough. At preferred options stage this matter should be addressed.
	Question 1	Ms Barbara Aldridge	Chairman Enfield Lock Conservation Group	The triple arc concept is too simplistic: The Borough of Enfield is composed of villages which have spread out to join one another, each of these villages has a distinctive character. An example of this is Enfield Lock which has been designated as part of New Enfield. Enfield Lock does not have the same profile as areas further south within the New Enfield arc. It has a long history and a distinct character with both industrial and rural features, these should be reflected in any decisions regarding further development in order to maintain the balance and prevent destabilisation. Enfield Lock could be also be placed within the Green Enfield and the Heart of Enfield sections.
	Question 1	Mr Patrick Blake	Network Strategy Highways Agency	The HA is concerned that the list of key issues in Section 2.3 of the new Plan refers to improvement of orbital links within the Borough and improving connectivity in the Upper Lee Valley without making reference to improving sustainable travel. Failure to promote sustainable travel could result in significant road improvements generating a greater number of car trips in the borough. In the HA's view, improving sustainable travel should feature as one of the key issues for the Borough and should therefore be a key driver in the formulation of policy. It is critical that local level land-use development strategies take full consideration of opportunities to reduce the need to travel, reduce the distance travelled and encourage travel by sustainable modes in accordance with PPG13. Failure to include sustainable travel as a key issue could therefore lead to the new plan contradicting PPS12 Test of Soundness 4.
	Question 1	Mr Giles Dolphin	Planning Decisions Manager Greater London Authority	The strategic objectives and Triple Arc concept is useful in conceptualising the future planning of the Borough although it is suggested that application of these objectives is clarified. Many of the objectives should apply across the Borough, notably objective 1 which promotes sustainable development and addressing the causes and impacts of climate change. However the separation into three distinct geographical categories implies that they have greater relevancy to each area which is clearly not appropriate in cases such as that of objective 1. It is suggested that the application of these objectives is clarified and those that are cross-cutting and those that are more specific to each of the three areas are more clearly set out.
	Question 1	Mr Alex Andrews	Principal Planner Transport for	In general transport and its key role in promoting climate change and energy efficiency is not given sufficient weight within the borough's objectives. TfL urges the borough to address this by including more information as proposed above.

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			London	
	Question 1	Ms Jill McGregor (GL Hearn)	Tesco Stores Ltd	Tesco supports the Triple Arc concept for planning for Enfield's future.
	Question 1	Gary Thomas (Planning Works Ltd)	Lionsgate Properties	It is noted that the Triple Arc concept has no hard boundaries. In the same way, the Core Strategy should recognise that there could and should be some crossover of the strategic objectives between each of the three arcs.
	Question 1	Meeting: ECEN 26.07.07		Participants indicated that they were generally unhappy about the Triple Arc concept
Introduction	3	Dr Chris Jephcott	President The Enfield Society	Good sentiments, but without adequate investment, commitment and unwillingness to compromise will not become a reality.
Introduction	3	Mr Alexander		Is the SSSI for King George V Reservoir only because birds of one species stop there while migrating? Para 4 - "add improve drainage and sewerage capacity"
Introduction	3	Ms Claire Martin	Policy Officer Lee Valley Regional Park Authority	The Authority welcomes the prominence given to environmental resource and climate change issues. The provision of environmental infrastructure will be considered as part of the Regional Park Development Framework. The aim is to review the potential for the Regional Park to accommodate environmental infrastructure although provision would need to be balanced with the Park remit and the value of its open spaces. The Authority supports the Green Enfield concept which recognises the value of preserving and maximising the benefits of natural assets, open space and the range of leisure and recreational opportunities that are located throughout the borough. The Authority welcomes the reference that is made in the Issues and Options report to protecting and enhancing biodiversity and sites such as William Girling and King George V reservoirs (Strategic Objective 2 and Para 4.3) which lie within the Regional Park. The Regional Park is the environmental focus for the regeneration of the Upper Lea Valley (ULV) and as such a major contributor to the Green Enfield concept and a key asset for the Borough. The statutory status of the Regional Park should be acknowledged and its boundaries protected through policy in the Core Strategy in due course. Reference should also be made to the review of the Park Plan 2000 and the process currently underway to produce a Park Development Framework by August 2008.
Introduction	3	Mr Graham Saunders	Senior Regional Planning Advisor English Heritage - London Region	No reference is made to historic landscapes that may or may not be protected. Within the Green belt it is noted that there are some significant landscapes which are designated as Registered Parks and Gardens. In addition there are two key listed buildings located in the Borough's open spaces, which English Heritage has identified as Mansions at Risk i.e. Forty Hall and Broomfield House. These key heritage assets should be recognised within the context of Green Enfield. Documentation published by English Heritage which should provide clarity of advice on open space provision and its improved accessibility and enhancement include Easy Access to Historic Landscape (2005), and The Park

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				Keeper (2005).
Introduction	3	Mr Glenn Stewart	Assistant Director of Public Health Enfield Primary Care Trust	It is very useful for health and well-being that the plan includes reducing air pollution levels throughout the borough. Appropriate targets and means will need to be set.
Introduction	3	Mr Alex Andrews	Principal Planner Transport for London	Green Enfield: TfL notes reference to reducing traffic congestion in the borough, but this should go further in its emphasis on public transport, walking, cycling and reducing car use generally across the borough.
Environmental Resources, Climate Change, and Biodiversity	4	Ms Karen Foster-	Planning Liaison Officer Environment Agency	<p>The issues and options document does not address environmental infrastructure, which is a significant issue in Enfield. Annex 2 of NLSRDF states that there are existing capacity/operational issues with the sewers in this area, and that the existing water supply infrastructure is unlikely to be able to support demand from the scale of development in North London as a whole. The location of development should take into consideration the relative availability of existing water resources and development should not be committed ahead of secure water supplies or relevant infrastructure. The provision of adequate water resources and wastewater treatment must not cause the water environment to deteriorate. Overall, there must be progress towards improved water status (in line with the Water Framework Directive). As noted previously, Sustainable Drainage Systems (SuDS) should be encouraged to improve water quality relating to the run-off from new developments (Policy 4A.12 London Plan and PPS25).</p> <p>The NLSRDF identifies the need to investigate the environmental infrastructure capacity in the area ahead of any development. We support this and wish to see a strategic and integrated approach to water management to ensure that environmental standards are not compromised as a result of the cumulative impacts of development.</p> <p>The formulation of an integrated water cycle study should identify a strategy for the required infrastructure and minimum time scales to achieve this. This study should be undertaken in order to underpin the soundness of the Core Strategy.</p>

Document Section	Section Number or Question	Name	Organisation	Response
Environmental Resources, Climate Change, and Biodiversity	4	Ms Karen Foster-	Planning Liaison Officer Environment Agency	<p>Water Quality: Poor water quality is an issue in parts Enfield, often as a result of urban diffuse pollution. Many of the problems are linked to sewerage issues such as misconnection and sewer overflows. We are aware of these issues and are working with Thames Water to deal with them. Diffuse pollution is a common legacy of poor quality urban drainage. Problems are especially acute during storm events. The effects of diffuse pollution in Enfield are commonly experienced in watercourses located in boroughs downstream namely the London Boroughs of Haringey, Waltham Forest and Hackney. An appreciation of the phenomena and the links between improving the water quality of urban drainage at source is essential if the problem is to be tackled successfully. Through effective design, construction and operation of sewerage systems, the use of wetlands and green space for flood alleviation, and the use of sustainable urban drainage systems (SuDS) that can reduce the impact of intense rainfall events, water quality can be improved. Sustainable urban drainage techniques (SUDS) can provide a mechanism to address this issue. SUDS should be actively encouraged in the borough for all new developments. The inclusion of SUDS can contribute towards improve the quality of the water environment particularly in the urban setting. In some instances it may be possible to retrofit SUDS and areas where this is possible should be identified within the Core Strategy. There may be problems with the application of SUDS on contaminated land, and we would be happy to advise further on this as applicable.</p> <p>Water Resources: Future development must be planned carefully to prevent pressure on the water environment (resources and infrastructure capacity). More information is required to support the water resources needs for the proposed physical developments, as no reference was made to this in the reports. As presented, issues such as need to demonstrate the availability of adequate water resources for project sustainability, and future water resources development have not been adequately addressed. The rivers in the area (including the Salmons Brook) suffer from low flow rates. The London Catchment Abstraction Management Strategy (CAMS) shows that Enfield is in an area, which is over abstracted and no new abstraction licences, will be granted by the Environment Agency here.</p>
Introduction	4.1	Mr Alexander		Climate change will only have a marginal impact locally, and we should use our heads not our hearts in attempting to reduce its causes; weighing costs to us against benefits where the Borough is not mandated by Government
Introduction	4.1	Chief Inspector Stuart Palmer	Police Partnerships Metropolitan Police	The introduction to green Enfield could say something about safety of parks and open places to reflect the authority and police investment in safer parks unit.
Introduction	4.1	Mr Alex Andrews	Principal Planner	Support reference to sustainable patterns of growth and reducing the need to travel.

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			Transport for London	
	Strategic Objectives	Mr Tony Watts	ECEN Representative Over 50s Forum	Strategic Objectives should include street scene and recycling
Sustainable Design and Construction	4.2	Mr Mark Hayes	The Chair Enfield Housing Association Forum	The new plan should strive to secure as near to carbon neutral design and construction as can be achieved practically in the short and medium term The linkage of this point to "Green Enfield" emphasises that "the Triple Arc" is not as definable geographically as the "map" related to it suggests. It needs to clear that sustainable design and construction should be pursued with equal vigour throughout the Borough.
Sustainable Design and Construction	4.2	Ms Anna Chapman	Planner British Waterways-London Region	The waterways can facilitate the following sustainability measures in the design and construction of waterside developments.: <ul style="list-style-type: none"> • Waterborne freight transport for transporting demolition and construction waste, construction materials, household and commercial waste & recyclates and other low value, bulky, non time sensitive goods and products; • Sustainable urban drainage systems (SUDS) (factsheet attached for more info); • The maximisation of grey water instead of valuable fresh water resources; and • The use of the canal water source for heating/ cooling systems (factsheet attached for more info). These measures help ensure the earth's natural resources are maximised and recycled to make development more sustainable, improve energy efficiency, reduce carbon emissions and conserve fresh water. BW therefore believes the LDF should ensure that developers are required to consider the feasibility of these sustainable options for development within reasonable proximity to the River Lee Navigation.
Sustainable Design and Construction	4.2	Mr Alex Andrews	Principal Planner Transport for London	TfL supports sustainable design principles in line with good practice currently endorsed by the Mayor and GLA.
Biodiversity	4.3	Mr Mark Hayes	The Chair Enfield Housing Association Forum	A stronger emphasis should be placed on creating "green" corridors and enhancing biodiversity in locations throughout the Borough. Enfield's open spaces are not readily accessible to all residents, and opportunities to create new "green lungs" should be explored in areas where such space is in short supply. Underutilised commercial/brown field sites may provide suitable sites.
Biodiversity	4.3	Ms Barbara Aldridge	Chairman Enfield Lock Conservation Group	In addition to points raised in the Biodiversity section (paragraph 4.3) we ask that the report should include more detail about biodiversity in Enfield and the local Biodiversity Action Plans - this is an important part of planning where there is possible loss of habitats.
Biodiversity	4.3	Ms Anna Chapman	Planner British Waterways-London Region	The River Lee Navigation is a valuable corridor for wildlife within Enfield and is a Site of Metropolitan Importance for Nature Conservation. Reference should be made to the Canal Habitat Action Plan (HAP), which forms part of the London Biodiversity Action Plan and BW's role in waterway ecology in any strategic assessment of ecology and biodiversity in the borough.

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Energy and Renewable Energy	4.4	Ms Anna Chapman	Planner British Waterways-London Region	As mentioned under section 4.2 above, canal water can be used for heating and cooling systems for waterside development and waterborne freight transport can be used to help improve energy efficiency and utilise natural resources.
Waterways	4.5	Ms Karen Foster-	Planning Liaison Officer Environment Agency	<p>This section has referred to some of the waterways in the Borough. All of the following waterways are found in Enfield and should be given due recognition in the document: The Lee Navigation and the River Lee, Salmons Brook, Pymmes Brook, Holhill Brook, Turkey Brook, Cuffley Brook, Small Lee, Warwick Field Ditch, Brimsdown Ditch, Sadlers Mill Stream, Hounsden Gutter, Merry Hills Brook, Leeging Beech Gutter, Bounds Green Brook, Intercepting Drain, Enfield Ditch, Western Flood Channel. We support the recognition that the waterways of Enfield are valuable assets to the Borough. It should be noted that preserving these waterways and their associated floodplains will be key towards reducing flood risk in Enfield. This section should also make reference to our requirement for buffer zones adjacent to watercourses. Buffer zones are discussed in further detail later in this response. River Restoration: The Core Strategy Issues and Options report should make reference to our North London River Restoration Strategy. Many rivers have been degraded in the past by development and the effects of pollution and therefore opportunities should be taken wherever possible to restore and enhance the watercourses of Enfield. The Core Strategy could include a policy on River Restoration in order to achieve this aim. We have advised on similar policies for the Local Development Frameworks of other Authorities.</p> <p>River restoration schemes can have many benefits, including: Improving the river corridor as a valuable habitat for wildlife and as a landscape, Improving flood storage capacity, Aiding water quality issues, Improving wellbeing by providing an attractive natural environment in which to live and work Educating the community (e.g. local school field trips), Balancing community access and the conservation of wildlife, Contributing towards the achievement of sustainable development, Significant watercourses (namely the Pymmes and the Salmons Brook) link a number of public open green spaces. Access is limited and difficult in places. We are currently working with partners to assess the restoration potential of these rivers to facilitate environmental gains that include improving water quality. However the lack of funding may be significant barrier to the success of this study. The River Restoration document identifies specific opportunities for restoration specific to Enfield. We would welcome the opportunity to meet with you to discuss the options in more detail.</p> <p>Buffer Zones: Developments close to watercourses will be required to leave a green buffer zone between buildings and the watercourse. Buffer zones alongside watercourses provide green space for people and wildlife and are an essential element of a healthy aquatic ecosystem. We would welcome a policy in the Core Strategy highlighting the importance of/requirements for buffer zones. With sites immediately adjoining a river corridor, we require an 8-metre buffer zone. This buffer zone is measured from the top of the riverbank. With ordinary watercourses, our requirement is for a 5metre buffer zone, again measured from the top of the bank. It is important that buffer zones are provided and maintained. The buffer zone is key to the preservation to the river in terms of its biodiversity value and also for water quality. Buffer zones are also important from a flood risk perspective we need to ensure that adequate access is maintained in order for us to carry out our flood defence functions and that space is provided for water to flow in times of flood.</p> <p>Culverted Watercourses: We have a policy against culverting and building over culverts because of the</p>

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				potential implications this can have for flood risk and the integrity and safety of the culvert. Building over culverted watercourses can preclude any future opportunities for opening up and restoring the watercourse and integrating it back into the natural environment. We will encourage the removal of culverts and the restoration of watercourses wherever possible, in line with our River Restoration Strategy. The report recognises the links between the potential afforded by waterside development and the need to improve access to water features. Significant barriers currently exist within the borough that hinder or in some cases prevent access by the public to rivers and streams. In some instances this is due to the hard engineering techniques used to confine watercourses to facilitate the efficient conveyance of surface water. Watercourses that have been culverted in parts for example the Sadlers Mill Stream and the Boundary Ditch could benefit from increased public awareness of their existence. A strategic view of the potential of water features in Enfield could assist in achieving our river restoration strategy in the borough. Restoring urban rivers by the removal of culverts enables greater appreciation by the local population of Enfield's historic hidden watercourses. From a pollution perspective, the restoration of rivers combined the removal of culverts enable us to identify more readily those rivers that are become polluted due acute and chronic sources.
Waterways	4.5	Mr Graham Saunders	Senior Regional Planning Advisor English Heritage - London Region	The Waterways that help define this part of the Borough are of significant historic value and importance. This is not recognised in the current text.
Waterways	4.5	Ms Anna Chapman	Planner British Waterways- London Region	BW's local vision for London is that London's Canals and Docks achieve a recognition and status of other historic London landmarks, occupying an important role in the strategic planning and regeneration of the capital city. A commitment to quality service and facilities will see visitor and boating activity double in the period up to 2012, and with a more engaged community, local pride and ownership will be engendered. Increased, but sustainable use of the canal and dock system, with appropriate balance between vibrancy and tranquillity, underpinned by our commercial activity will ensure their long-term prosperity. In recognition of the pivotal role of the waterways in the planning and development processes, BW has produced Waterways & Development Plans (2003) to guide the key stakeholders in the process of integrating the inland waterways into the development plan system. Your attention is also drawn to Waterways for Tomorrow (DETR 2000) and Planning a future for the Inland Waterways (Inland Waterways Amenity Advisory Council 2001). You should already have hard and electronic copies of these documents, please ask Robert Singleton in the first instance, otherwise additional copies can be made available on request.
Waterways	4.5	Mr Alex Andrews	Principal Planner Transport for London	TfL supports the role of Enfield's waterways in contributing to sustainable transport. Opportunities to move people and goods using the Blue Ribbon Network should be explored.
Flooding	4.6	Dr Chris Jephcott	President The Enfield Society	4.6.4 In addressing the growing problem of run off suggest measures to reduce contribution caused by increasing paving over of front gardens for parking should be sought.

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Flooding	4.6	Ms Karen Foster-	Planning Liaison Officer Environment Agency	<p>The key messages of the Thames Catchment Flood Management Plan need to be referred to here in detail as they highlight key Flood Risk Management goals for river catchments in London. PPS25 should be referred to in much more detail, the sequential and exception tests, which underpin PPS25, have not been mentioned and all forms of flood risk have not been considered. The importance of SUDS systems in reducing flood risk, and the need to undertake Surface Water Flood Risk Assessments for sites greater than 1 ha also need to be highlighted.</p> <p>Paragraph 4.6.1: In addition to having a flashy response to rainfall events, flood risk in Enfield is exacerbated when debris causes blockages in river channels and culverts. This should be noted here. Paragraph 4.6.3: The proposals in this section may conflict with the requirements of PPS25, reinforcing the need to undertake a SFRA to ensure that new development and regeneration in Enfield reduces flood risk and is located in the lowest risk locations of the Borough. Paragraph 4.6.4: The second sentence needs rewording and should emphasise that PPS25 seeks to achieve a reduction in flood risk, and a sequential approach to site allocation should be utilised to ensure that new development is prioritised in areas at least risk of flooding (i.e. Flood Zone 1). We note that you are currently undertaking your Strategic Flood Risk Assessment. The findings of the SFRA and the Sequential Test must be used to ensure that sites allocated for development are zoned in locations with the lowest flood risk. Suitable policies must also be developed to reduce all forms of flood risk. It is important to note that we would find the Core Strategy unsound at the submission stage if the SFRA is not incorporated into the Sustainability Appraisal and used to inform decisions about the location of the proposed development.</p>
Flooding	4.6	Ms Claire Martin	Policy Officer Lee Valley Regional Park Authority	<p>Flooding (Paragraph 4.6.4) and Managing Flood Risk. The Authority supports the naturalisation of watercourses and river restoration within the Regional Park as a way of enhancing the Park as part of the regeneration process where this is integral to proposals for recreation and habitat creation. This should be examined as part of the Strategic Flood Risk Assessment that the Council is proposing to undertake to inform the new plan. The Authority wishes to be kept informed of this process as most of the Regional Park is within the Environment Agency's Flood Risk Zone 3 with a 1 in 100 or greater annual probability of river flooding.</p>
Flooding	4.6	Ms Anna Chapman	Planner British Waterways- London Region	<p>As mentioned above under section 4.2, BW can accept surface water subject to water management capacity issues and providing the water quality of the discharge is equal to or better than the water quality of the receiving section of waterway. (See the attached factsheet for more info.) This area has a history of running low on water during the summer months. The improvement of water management is vital to ensure the canals remain open throughout the year. This can be achieved by better storm flow management and ensuring new developments include Sustainable Urban Drainage Systems to collect and discharge rain water straight in to the canal once the storm has passed rather than feeding it into the general sewerage system. Elsewhere around the country BW have dug boreholes to extract water from the sub-strata and this should be explored towards the head of the valley. BW are actively looking to identify opportunities to build new marinas that can be designed to provide both flow capacity in defence against flooding and vital water storage to let out when the system is low. A lock back-pumping system which reduces water loss as boats move down through the flight of locks also needs to be introduced to help with water management. BW is</p>

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				<p>already in discussion with the Environment Agency to introduce storm water holding structures to improve water management but it is vital that additional funding is secured to allow these works to proceed.</p>
Waste	4.7	Ms Anna Chapman	Planner British Waterways-London Region	<p>As referred to in section 4.2, BW is promoting the use of the canals for the movement of freight, especially for waste. There are a few operations currently underway. A pilot scheme was trailed in Hackney known as Waste by Water (for domestic/ commercial waste report attached) which would have been successful but for the nature of the vehicles used to transport the waste as double or triple handling renders the use of the canal too inefficient. However Power day's (at Old Oak Siding, Willesden Junction, LB Hammersmith & Fulham see www.powerday.co.uk), the waste handling company, are due to launch a new inter-modal vehicle which will improve the transfer of waste from road to barge and will make scheme such as this more viable. Power day's also process construction waste into aggregates which can then be transported back out to development sites whether by water, rail or road. A similar waterside site in the Lee Valley, potentially in Enfield, to help service the Olympics should be identified through the LDF process. BW has a contract with the London Waste Centre at Edmonton and is in dialogue with them about increasing the use of the canal to transport waste (including green waste for composting) and recyclables on the water. We understand the London Waste Centre has significant under-utilised capacity and are keen to see an increase in the use of the navigation for this purpose. BW would like to see the compost facility at the London Waste Centre moved adjacent to the River Lee Navigation or for a conveyor belt to be installed to make it more practical for the site to cope with green waste transported by barge. There may also be an opportunity for compost to be delivered away from the site by barge. BW is pleased to see the LDF confirm the commitment of Enfield to the Joint Waste Development Plan document with other local Councils to align their waste strategies to maximise the use of the canal and reduce road based waste transfer. BW would also like to see the LDF encourage new waterside development schemes to be designed to enable collection of waste and recyclables from the water's edge which would simplify the use of the waterways for the movement of materials. We feel this is important for the master planning of New Enfield which is navigation side and where significant development is due to take place in the next 10years or so which could benefit from such investment. In addition BW would like to see the LDF encourage construction waste for waterside sites to be transported by water.</p>

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Waste	4.7	Mr Giles Dolphin	Planning Decisions Manager Greater London Authority	<p>Section 4.7 of the Issues and Options report address the issue of waste, noting that as a joint waste Development Plan Document (DPD) is to be prepared with six other London boroughs, which will address the issue of waste planning, no specific question is asked. The preparation of a joint waste plan is welcomed. However, it is unacceptable to derogate all waste planning matters to the joint DPD. PPS10 is clear that Core Strategies should contain policies and proposals for waste management in line with the London Plan and ensure sufficient opportunities for the provision of waste management facilities in appropriate locations including for waste disposal. The Core Strategy should therefore provide an appropriate response to the waste policies in the Published Alterations to the London Plan (2006). Given that they have recently been tested through EiP and published there is no need for the Core Strategy (or the joint DPD for that matter) to re-open the principles that have been established. The Core Strategy should include a policy that: 1) Safeguards all existing waste management sites (unless compensatory provision is made). 2) Indicates that the Council, through the joint waste DPD, will identify sufficient land to provide capacity to manage the quantity of municipal solid waste and commercial and industrial waste apportioned to it. The Core Strategy should refer to the actual apportionment figure as set out in the draft Further Minor Alteration to the London Plan. It is acknowledged that this is currently in draft and will be tested through the Further Alterations EiP, which is taking place in June and July of this year. According to your revised Local Development Scheme the Core Strategy Preferred Options will be published in September 2007, around the same time as the EiP Panel Report and then Submitted to the Secretary of State at around the same time that the Further Alterations are expected to be published and become part of the London Plan. As a result the final waste apportionment will be established before the examination into the Core Strategy. In order to meet Soundness Test 9 the Core Strategy should be flexible enough to accommodate emerging regional policy and as such should refer to the draft figure and be flexible enough to incorporate the final figure once this is confirmed. 3) Identifies the broad location suitable for recycling and waste treatment facilities consistent with new waste policy 4. Table 4A.7 identifies Great Cambridge Road, Brimsdown and Central Leaside Business Area as locations which contain major opportunities for these facilities. 4) Encourages a range of waste facilities, including materials recycling, composting, mechanical biological treatment, anaerobic digestion and gasification/pyrolysis and encourages co-location of these facilities to form resource recovery parks. 5) Identifies the broad criteria for considering waste applications, which in addition to the factors set out above could include: proximity to source of waste; the nature of activity proposed and its scale; the environmental impact on surrounding areas, particularly noise, emissions, odour and visual impact, and; the full transport impact of all collection, transfer and disposal movements, particularly maximising the potential use of rail and water transport. The Core Strategy should also set targets by waste stream, as identified in the Mayor's Municipal Waste Management Strategy/London Plan and Further Alterations: MMWMS targets to:</p> <ul style="list-style-type: none"> • Recycle or compost at least 30% of household waste by 2010 and at least 33% by 2015. • To recover value from 45% of municipal waste by 2010 and 67% by 2015. • London Plan targets to exceed recycling or composting levels in household waste of: 30% by 2010 and 33% by 2015. • London Plan self sufficiency targets: MSW 50% self sufficiency by 2010, 75% by 2015 and

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				<p>80% by 2020</p> <ul style="list-style-type: none"> • C&I 75% self sufficiency by 2010, 80% by 2015 and 85% by 2020 • C&D 95% self sufficiency for 2010, 2015 and 2020 <p>Further Alterations municipal targets to:</p> <ul style="list-style-type: none"> • Exceed recycling or composting levels in municipal waste of 35% by 2010 and 45% by 2015. • Achieving recycling or composting levels in commercial and industrial waste of 70% by 2020 • Achieving recycling and re-use levels in construction, excavation and demolition waste of 95% by 2020.
Waste	4.7	Mr Daniel Olliffe (Iceni Projects)	Principal Planner The Anderson Group	<p>Waste and recycling operations are a key activity undertaken by The Anderson Group. Forward thinking in their approach to recycling activities, The Anderson Group are an established operator in this sector who are acutely aware of the importance of ensuring future provision for waste and recycling activities. To this regard the establishment of a Joint Waste Development Plan Document is fully supported. The Anderson Group already operate one of the most technologically advanced and efficient soil washing and construction waste recycling facilities in the Country at Cole Green, Hertford and it is considered that sufficient regard should be had to appropriate site allocation for such activities within the Core Strategy. Furthermore, to ensure a sustainable future for the Borough and the wider sub-region, it is considered of paramount importance that suitable sites are safeguarded for new waste and recycling facilities. The Core Strategy should have regard to this future need but it is understood that site provision will be considered in detail within the Joint Waste Development Plan Document.</p>
Waste	4.7	Mr Alex Andrews	Principal Planner Transport for London	<p>TfL promotes the sustainable transport of waste across London. The LDF should make reference to ways in which waste can be transferred more efficiently by examining the potential for transfer by public transport and through consolidation centres. Waste can also be treated on site. TfL supports the principles currently being endorsed by the GLA.</p>
Aggregates	4.8	Mr Peter O'Brien	Partnership Manager Learning Skills Council	<p>We feel that the King George V reservoir offers potential employment by virtue of its SSSI designation and as a tourist location. These possibilities outweigh the advantages of dredging. This is consistent with the plans for the Upper Lee Valley, to which we also feel that reference should be paid in the plans for the Borough.</p>
Aggregates	4.8	Ms Anna Chapman	Planner British Waterways-London Region	<p>In addition to transporting construction waste which has been recycled/ processed into aggregates, BW encourages the transport of building materials by water between waterside suppliers and development sites. Burdens, a construction material depot located at Pickets Lock, have a yard of approximately 6 acres with a significant length of canal side frontage ideal for the transport of building materials to waterside sites, especially the Olympics and related regeneration areas in the Lee Valley, by barge. BW is pleased to see para 4.8.4 of the LDF recognise the potential of canal wharves. BW London, in conjunction with TfL, is currently reviewing the waterways to safeguard strategic wharves to ensure the navigation is accessible in the future for the range of purposes it may be required. With the road network becoming more congested BW believe that the canals offer an alternative and truly sustainable form of transport for freight and passengers that is not currently being utilised. BW is therefore promoting the use of the canals for freight transport, where viable,</p>

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				along the canals. At present the focus is on construction materials and waste where the source and destination of the materials are adjacent to the canal. For this potential to be realised it is vital that future developments are designed to enable the collection of domestic waste and recyclables which may then be transported to a waterside waste management facility. BW's Strategic Wharf Assessment is to be carried out shortly, the results of which shall be forwarded separately for consideration as part of the LDF.
Aggregates	4.8	Mr Daniel Olliffe (Iceni Projects)	Principal Planner The Anderson Group	Waste and recycling operations are a key activity undertaken by The Anderson Group. Forward thinking in their approach to recycling activities, The Anderson Group are an established operator in this sector who are acutely aware of the importance of ensuring future provision for waste and recycling activities. To this regard the establishment of a Joint Waste Development Plan Document is fully supported. The Anderson Group already operate one of the most technologically advanced and efficient soil washing and construction waste recycling facilities in the Country at Cole Green, Hertford and it is considered that sufficient regard should be had to appropriate site allocation for such activities within the Core Strategy. Furthermore, to ensure a sustainable future for the Borough and the wider sub-region, it is considered of paramount importance that suitable sites are safeguarded for new waste and recycling facilities. The Core Strategy should have regard to this future need but it is understood that site provision will be considered in detail within the Joint Waste Development Plan Document.
Your Views	4.9	Dr Chris Jephcott	President The Enfield Society	Question 2 poses a direct question, so responses 'support' or 'object' are not appropriate. The same applies to many of the other questions. We believe should always aim for highest standards, so where these are achievable within practical limits they should always be adopted.
Your Views	4.9	Ms Georgie Cook	Town Planning Administrator Thames Water Property Services	Questions 2 and 3 - Ensuring high standards of sustainable design and construction for residential and commercial developments. We welcome the objectives of the Code for Sustainable Homes and we would support a policy that seeks higher standards above and beyond the Code for Sustainable Homes for residential and commercial development. This would enable new developments to come forward that maximize water efficiency wherever possible. However it should be acknowledged that water efficiency is only one element of our regulatory twin track approach to provide water in a sustainable fashion. The provision of additional water resources may also be required to meet the requirements of climate change and growth. As explained in detail below, we would welcome a specific policy on water use, supply and quality, which covers all development, and supports water efficiency measures alongside new water resources. Paragraphs B3 to B8 of PPS12 place specific emphasis on the need to take account of water supply and sewerage infrastructure in preparing Local Development Documents. Paragraph B3 in particular states: the provision of infrastructure is important in all major new developments. The capacity of existing infrastructure and the need for additional facilities should be taken into account in the preparation of all local development documents. Infrastructure here includes water supply and sewers, waste facilities. To meet the test of soundness as set out in PPS12 it is essential that the LDF does consider such water and sewerage infrastructure. In December 2005 The Planning Inspectorate published Development

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				<p>Plans Examination A Guide to the Process of Assessing the Soundness of Development Plan Documents. The Guide sets out a series of key questions and evidence requirements at section 1.4, which aims to provide a framework for the assessment of soundness of DPDs. The most relevant key question under Conformity Test iv (a) is: Key Question - Has adequate account been taken of the relationship between the proposals in the DPD and other requirements, such as those of utility companies and agencies providing services in the area including their future plans or strategy and any requirements for land and premises, which should be prepared in parallel? A key source of evidence which is identified in answering this question is: Evidence - of particular significance, will be representations from bodies that consider that the DPD either does or does not have sufficient regard to other relevant strategies for which they are responsible. There are also relevant key sources of evidence identified in answering Coherence Test number (vii). The sources of evidence are: the DPD is a Core Strategy, the following documents, amongst other evidence, may be relevant: ...infrastructure providers investment programmes and strategies; environmental programmes etc. Statutory water and sewage undertakers investment programmes are based on a 5-year cycle, known as the Asset Management Plan (AMP) process. We are currently in the AMP4 period, which runs from 1st April 2005 to 31st March 2010, and this therefore does not cover all of the Enfield LDF plan period. As part of our five year business plan review Thames Water advise OFWAT on the funding required to accommodate growth in our networks and at all our treatment works. As a result we base our investment programmes on development plan allocations, which form the clearest picture of the shape of the community (as mentioned in PPS12 paragraph B6). This relates to all new development and not only the major development proposals. We require a three to five year lead in time for provision of the extra capacity. Where a complete new water or sewage treatment works is required the lead in time can be between five to ten years. New development may therefore need to be phased to allow the prior completion of the necessary infrastructure. Regarding the funding of water and sewerage infrastructure, it is our understanding that Section 106 Agreements cannot be used to secure water and waste water infrastructure upgrades. However, it is essential to ensure that such infrastructure is in place to avoid unacceptable impacts on the environment such as sewage flooding of residential and commercial property, pollution of land and watercourses, and water shortages with associated low pressure water supply problems. When developers consider soft landscaping Thames Water need to ensure that the planting of shrubs and trees do not damage our pipes and mains, in order to help avoid main bursts or sewer leaks. Water and sewerage undertakers have limited powers under the Water Industry act to prevent connection ahead of infrastructure upgrades and therefore rely heavily on the planning system to ensure infrastructure is provided ahead of development either through phasing or the use of Grampian style conditions. It is essential that developers demonstrate that adequate capacity exists both on and off the site to serve the development and that it would not lead to problems for existing users. In some circumstances this may make it necessary for developers to carry out appropriate studies to assert whether the proposed development will lead to overloading of existing water and sewerage infrastructure. Where there is a capacity problem and no improvements are programmed by the statutory undertaker, then the developer needs to contact the undertaker to agree what improvements are required and how they will be funded prior to any occupation of the development. It will therefore be essential that the Core Strategy makes reference</p>

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				<p>to the provision of adequate water and sewerage infrastructure to service all new development and not only major development to avoid unacceptable impacts on the environment (such as sewage flooding of residential and commercial property). Therefore, if the Core Strategy is to meet the soundness test, then it is considered that the Policy should be included in the Core Strategy:- Water Use, Supply and Quality: Water conservation All new developments should incorporate water conservation and water efficiency measures, which as a minimum meet the standards set out in the Code for Sustainable Homes. Water and sewerage infrastructure - Planning permission will only be granted for developments which increase the demand for off-site service infrastructure where: 1. sufficient capacity already exists or 2. extra capacity can be provided in time to serve the development which will ensure that the environment and the amenities of local residents are not adversely affected. When there is a capacity problem and improvements in off-site infrastructure are not programmed, planning permission will only be granted where the developer funds appropriate improvements which will be completed prior to occupation of the development. Sub-text along the following lines should be added to the Core Strategy to support the above proposed Policy: The Council will seek to ensure that water conservation measures are incorporated into new developments wherever feasible. The Council will also seek to ensure that there is adequate water supply, surface water, foul drainage and sewerage treatment capacity to serve all new developments. Developers will be required to demonstrate that there is adequate capacity both on and off the site to serve the development and that it would not lead to problems for existing users. In some circumstances this may make it necessary for developers to carry out appropriate studies to assert whether the proposed development will lead to overloading of existing infrastructure. Where there is a capacity problem and no improvements are programmed by the statutory undertaker, the Council will require the developer to fund appropriate improvements which must be completed prior to occupation of the development. It is considered that the above policy and supporting text accords with the guidance referred to above in PPS12 and the London Plan, as well as being inline with the Core Strategy Sustainability Appraisal. Question 4 - Promoting energy efficiency and new forms of renewable energy. Thames Water recognise the importance of climate change, for example: as a business, we are developing a climate change policy and strategy. PPS22 (paragraph 8) states that local planning authorities may include policies in local development documents that require a percentage of the energy to be used in new residential, commercial, and industrial development to come from on site renewable energy developments. Paragraph 8 of PPS22 goes on to state that such policies: (i) should ensure that requirement to generate on-site renewable energy is only applied to developments where the installation of renewable energy generation equipment is viable given the type of development proposed, its location, and design; (ii) should not be framed in such a way as to place an undue burden on developers, for example, by specifying that all energy to be used in a development should come from on-site renewable generation. We therefore consider that the policy should seek 10% of anticipated energy demand from renewable sources where this is viable on site, given the type of development proposed. This is particularly relevant to operational utility development. We consider that the policy should be drafted along the following lines:- The Council will seek the efficient use of energy in all new developments within the Borough. Major developments should commit to provide at least 10% of anticipated energy demand from renewable sources, where this is viable, given the type of development proposed. Question 5 - Managing Flood</p>

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				Risk Thames Water agrees that the Core Strategy should have a policy preventing most forms of development from being built in the flood plain. However we suggest that in accordance with PPS25 that the policy also makes reference to the fact that essential utility infrastructure is often located in the floodplain and there may be requirements for additional infrastructure development within areas of high flood risk. We also consider that sewer flooding should be listed as one of the forms of flooding, again this is line with PPS25.
Your Views	4.9	Mr Alexander		Question: plan should not contain provision for renewable energy provision. Reason is that very many forms are not ecologically sound, many are very expensive and require subsidising, and some are obtrusive or ugly
Your Views	4.9	Mr Giles Dolphin	Planning Decisions Manager Greater London Authority	Questions 2 & 3 The new plan should promote the highest standards of sustainable design and construction feasible for all types of development. These should be in general conformity with London Plan Policy 4B.6 and the Sustainable Design and Construction SPG (May 2006) which applies to all types of development. Furthermore the draft further alterations to the London Plan require developments to make the fullest contribution tackling climate change by minimising carbon dioxide, adopting sustainable design and construction and prioritising decentralised energy including renewables. The sustainable design and construction policies of the London Plan should be seen as a benchmark to be achieved and, where appropriate, exceeded. Therefore where the new Code for Sustainable Homes or any similar future initiative promotes higher standards than the London Plan this may be supported. Similarly should the Council wish to sincerely exceed the standards set out in the Code for Sustainable Homes in those areas identified then this may be supported in the interests of promoting sustainability provided this does not significantly harm the implementation of other policies in the London Plan.
Your Views	4.9	Mr Alex Andrews	Principal Planner Transport for London	Question 2/3/4/5: Whilst transport is not directly related to the questions provided, as previously stated the role of sustainable transport and the relationship between transport and development in greening Enfield is not given sufficient weight within this section of the LDF.
	Question 2	Mr Tony Watts	ECEN Representative Over 50s Forum	I am not familiar with the code. However I would suggest that there could be a case for including standards for run-off water management/storage if climate change is cause regular water shortages to residential properties.
	Question 2	Mr Andrew Newman	Forty Hill and Bulls Cross Study Group	Water efficiency and surface water drainage should be key. It is important not too loose sight of aesthetics and visual impact especially when trying to achieve an environmentally friendly building. It is surprising that the North London underground reservoir scheme isn't mentioned or the use of bore holes.

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	Question 2	Ms Karen Foster-	Planning Liaison Officer Environment Agency	The strategic objectives need to make reference to adapting to climate change and to flood risk management. The plan should seek to meet the minimum standards set out in the Governments Code for Sustainable Homes, and should seek to higher standards in all areas wherever practicable. Water is an important resource and it is essential that it be used wisely. Every opportunity should be taken to build water efficiency into new developments, and innovative approaches should be encouraged. Design should ensure that water consumption does not exceed more that 120l per head per day so that the ODPMs sustainable community's target of reducing water consumption by 25% in all new properties is achieved. We support all initiatives aimed at reducing water use 1.Section 208 Of the North London Sub Regional Development Framework (NLSRDF) states that new developments over 100 houses or 1000m2 should seek to achieve a minimum of very good eco-homes or BREEAM rating. 2.London Plan Policy 4A9 states that development greater than 1000m2 provide at least 10% of their energy from on-site renewable sources wherever feasible.
	Question 2	Dr Chris Jephcott	President The Enfield Society	NB This question asks a question, so responses 'support' or 'object' are not relevant. We believe should always aim for highest standards, so where these are achievable within practical limits, should always be adopted.
	Question 2	Mr James Finn (Barton Willmore Planning)	Planner St James Developments Ltd	The Plan should reflect the Code for Sustainable Homes.
	Question 2	Mr Glenn Stewart	Assistant Director of Public Health Enfield Primary Care Trust	The Plan should seek higher standards for sustainable design and construction for each of water efficiency, surface water drainage, site waste management and household waste management and recycling. Reasons for supporting higher standards are that economic (land-fill taxes are going to rise thereby costing the Council and therefore residents more), environmental (one of the attractions of Enfield is its environment which should be preserved and enhanced) and future proofing (Enfield Risk Register includes flooding and risk needs to be ameliorated as far as is practical).
	Question 2	Ms Jill McGregor (GL Hearn)	Tesco Stores Ltd	The Enfield Plan should set the same residential design and construction standards as the Government's Code for Sustainable Homes.
	Question 2	Amit Malhotra (RPS Planning)	Senior Planner Fairview New Homes Limited	Fairview object to the inclusion of the Central Government's Code for Sustainable Homes initiative into the Core Strategy. In addition, Fairview also object to the Council's suggested option to seek standards of sustainable design and construction that would be above and beyond the standards set in the Code for Sustainable Homes. Fairview considers that the Code for Sustainable Homes (2006) initiative should remain voluntary as stated in the document and that Councils cannot require developers to comply with it. Such initiatives are a cost to the developer and the viability of delivering housing schemes must be a priority. In addition, the other option to seek sustainable design and construction standards above and beyond the voluntary Code for Sustainable Homes is also considered to further threaten the economic viability of delivering housing schemes within the Borough.

Document Section	Section Number or Question	Name	Organisation	Response
	Question 2	Gary Thomas (Planning Works Ltd)	Lionsgate Properties	The Plan should reflect the national code.
	Question 3	Mr Tony Watts	ECEN Representative Over 50s Forum	Need for standards in Landscaping and greening
	Question 3	Dr Chris Jephcott	President The Enfield Society	Same applies as EPS5. Can see no reason why commercial buildings should not conform.
	Question 3	Mr Mark Hayes	The Chair Enfield Housing Association Forum	The plan should seek secure the highest standards in sustainability from all buildings. Currently, much of the commercial development on the east side of the Borough is unattractive and unimaginative. Pursuing high levels of sustainability in construction and development could make a significant impact on the visual appearance of the environment as well securing low carbon performance
	Question 3	Mr Andrew Newman	Forty Hill and Bulls Cross Study Group	Higher standards can be sought but as mentioned above aesthetic impact should also be given a high priority. What about Areas of Special Character in the Green Belt as we have at the moment?
	Question 3	Ms Karen Foster-	Planning Liaison Officer Environment Agency	We agree that the plan should seek higher standards of sustainable design and construction for commercial buildings in Enfield. BREEAM ratings can be used as stated in Section 208 of NLSRDF
	Question 3	Ms Barbara Aldridge	Chairman Enfield Lock Conservation Group	Commercial and public buildings should have a high standard of sustainable design, at least to that of residential buildings. Large area commercial buildings are a good source of space for green roof projects. They can also have other ecologically friendly features for example bat roosts and provision for nesting birds.
	Question 3	Mr Glenn Stewart	Assistant Director of Public Health Enfield Primary Care Trust	Yes for the above reasons [see question 2] and because sustainable can also mean cost-effective. For example there are department stores run on ground-source heat pumps and the Wellcome building in Euston
	Question 3	Ms Jill McGregor (GL Hearn)	Tesco Stores Ltd	Commercial sustainable design and construction standards should comply with London Plan Policy 4B.6
	Question 4	Dr Chris Jephcott	President The Enfield Society	Support providing environmental and visual amenity aspects taken into account. The Lea Valley offers opportunity for wind power generation, the NW Green Belt area does not.
	Question 4	Mr Alan Melhuish	Advocate	Para 4.9 " Views " Promoting energy efficiency. Greater successes can be achieved by upgrading the existing housing and building stocks that relying on new build. Obviously build new developments to the highest eco technological standard of efficiency , but community and business initiatives from the Council advocating greater public involvement are needed.

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	Question 4	Mr Mark Hayes	The Chair Enfield Housing Association Forum	There is an opportunity to "showcase" good low energy design on the eastern corridor, maximising the waterway context and securing new buildings and renewable energy sources that provide a "visual" low energy design as well as a practical one.
	Question 4	Mr Andrew Newman	Forty Hill and Bulls Cross Study Group	Renewable energy developments should be subject to strict controls, from growing bio fuel crops to solar power facilities. Special consideration should be given to landscape and environmental impact. Hydro electric power and local neighbourhood power generation facilities should also be considered.
	Question 4	Ms Karen Foster-	Planning Liaison Officer Environment Agency	The new plan should contain provision for renewable energy developments in the Borough. Energy efficiency should be encouraged through planning and design. On site renewable energy generation with a view to reducing carbon dioxide emissions should be promoted. Draft PPS1 Climate Change Supplement outlines the important role local Development Plan Documents will play in shaping the framework for sustainable energy production and low carbon and renewable energy in their area. London Plan Policy 4A9 states that development greater than 1000 square metres provide at least 10% of their energy from on-site renewable sources wherever feasible. Section 210 of the North London Sub-Regional Framework (NLSRFD) states that on site renewable energy technologies should be sought in all new developments. Where possible boroughs should also identify suitable sites for renewable technology and set targets.
	Question 4	Mr Hammett	Environment and Landuse Advisor National Farmers Union	The NFU strongly supports renewable energy initiatives and encourages proposals for local policies to maximise renewable energy sources. Agriculture offers solutions to climate change and can help secure renewable energy targets through the production of energy crops, solar and wind farms and energy recovery through anaerobic digestion from animal and food waste. Each source requires full evaluation and must be economically viable. We need positive planning policies to facilitate the building of small-scale energy generation schemes and the infrastructure to make energy production succeed including the storage, distribution and processing of raw products. However, our fear is that whilst government sets various targets, it is not committed financially to making alternative energy provision a viable commercial reality. As well as a proactive planning regime the tax regime must be improved so that farm production of renewable energy crops can become economically viable.
	Question 4	Dr Chris Jephcott	President The Enfield Society	Same applies as EPS5.Can see no reason why commercial buildings should not conform
	Question 4	Ms Barbara Aldridge	Chairman Enfield Lock Conservation Group	The western part of the green belt around Enfield is described as being sensitive to change. This is also true of the eastern side. The suggested wind farm (paragraph 4.4.3.) would have a severe impact on the migratory bird routes along the Lee Valley also a high visual impact on the relatively uncluttered views from Enfield towards the Epping Forest Ridge.

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	Question 4	Mr Glenn Stewart	Assistant Director of Public Health Enfield Primary Care Trust	Should the new plan contain provision for renewable energy developments in the borough? Yes, any reduction of fuel use within the borough would be useful from both an economic and environmental perspective, especially when fuel prices are only likely to rise. If allied to social housing / housing in general this would increase the disposable income available to residents which would be positive for both their health and the local economy. What kind of developments would you like to see and where? Energy efficiency is an obvious first step. It is estimated that leaving equipment switched on costs the average Small / Medium-sized enterprise (SME) £5000 a year. Insulation is another easy win the Council could support home efficiency measures throughout the borough, particularly for people that may be capital rich, cash poor. Measures such as winter-warmth would improve the housing stock in the borough and particularly impact upon the older population. In areas such as Greenwich some 5% of the elderly population have taken up winter warmth grants. In all new buildings sustainability should be an integral part of the planning process. This should include insulation, planning to maximise the use of natural light / heat, the use of ground source heat-pumps, grey water, recycling, wind-turbines and the use of solar panels. The planning system should also make it much easier and explicit how planning permission for any of the above developments can be obtained.
	Question 4	Mr Giles Dolphin	Planning Decisions Manager Greater London Authority	The new plan should promote energy efficiency and renewable energy in all development in general conformity with the London Plan energy policies 4A.7, 4A.8, 4A.9 and 4A.10, and the Mayor's Energy Strategy (2004). These aim to reduce carbon emissions by requiring the incorporation of energy efficient design and technologies, and renewable energy technologies where feasible. The policies also require a demonstration of how the scheme meets a proportion of its energy demand from renewables with a 10 per cent minimum target. The draft further alterations to the London Plan require developments to make the fullest contribution to tackling climate change by minimising carbon dioxide, adopting sustainable design and construction and prioritising decentralised energy including renewables.
	Question 4	Ms Jill McGregor (GL Hearn)	Tesco Stores Ltd	The Plan should contain provisions for renewable energy developments in conformity with London Plan Policy 4A.9 as part of major or strategic developments
	Question 4	Amit Malhotra (RPS Planning)	Senior Planner Fairview New Homes Limited	Fairview object if a particular provision is stipulated in the Core Strategy or a particular threshold is set for residential developments to provide renewable energy sources. Whilst recognising that the construction industry need to become more proactive in promoting and incorporating the use of environmentally friendly technology in the built environment, whereby Fairview has gone as far as to introduce a wide range of renewable energy measures in its recent developments. The use of a blanket policy to provide renewable technology should not stifle regeneration and development. Such rigid requirements may make some schemes unviable and as a consequence important housing sites may not come forward to be developed. Moreover, where difficult sites are being regenerated and the costs are significant, other issues may be more important to reduce, for example contamination and affordable housing. The viability of delivering schemes must be a priority. Fairview therefore object to any specific requirement of renewable energy provision unless the viability issue is made clear in the policy and the policy is based on a site-by-site basis.

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	Question 4	Gary Thomas (Planning Works Ltd)	Lionsgate Properties	The Plan should seek an equivalent standard of sustainable construction for commercial buildings to that required by the national code for residential buildings providing that does not compromise economic viability.
	Question 5	Mr Tony Watts	ECEN Representative Over 50s Forum	Agree that there should be an assessment for improving/regenerating rivers etc
	Question 5	Dr Chris Jephcott	President The Enfield Society	Favour 1. but not an either/or situation
	Question 5	Ms Karen Foster-	Planning Liaison Officer Environment Agency	The undertaking of the SFRA will enable you to map all forms of flood risk in your borough and help you locate future development in areas at least risk of flooding. This plan should enable the Thames Catchment Flood Management Plan to be implemented and should resist development in inappropriate locations. In areas of High risk in the Lee Valley the new plan should resist all inappropriate development. The plan should also assess the scope for reducing and mitigating the problems of flooding including naturalisation of water courses and river restoration as part of any regeneration and development process. In the absence of an SFRA it is likely that the proposals to redevelop the Lee valley will conflict with the requirements of PPS25. PPS25 asks Local Planning Authorities to undertake a sequential approach to site allocation by mapping all forms of flood risk and first seeking to develop areas in Flood Zone 1 where flood risk is at its lowest. We will object to proposals to develop the Lee Valley without them having been justified through a SFRA and the sequential test. The plan should recognise the contribution that flood risk management can make alongside other planning policies in helping deliver sustainable communities. It should ensure that flood risk is taken account of at all stages of the planning process to avoid inappropriate development in areas at highest risk (see Annex D in PPS25) and direct development away from these areas using the sequential test. PPS25 requires that strategic flood risk assessments and site specific flood risk assessments be carried out as appropriate to appraise the risk of flooding. As the effects of climate change become more apparent we will need to ensure that we are adaptable. It may mean that in the long term it is not economically viable to maintain the current flood defences (although they will be maintained for at least another life cycle). This means that alternative ways to manage flood risk need to be identified in line with the Thames Catchment Flood Management Plan and North London River Restoration Strategy.
	Question 5	Mr Hammett	Environment and Landuse Advisor National Farmers Union	We are concerned with the potential affects of flooding on rural communities and agricultural businesses. Such strategic flood risk issues require extensive consultation with the community as policies will potentially affect both personal and business interests. We would like solutions for flooding to include winter water capture and storage on farms which is also a key element of the Environment Agency's Water Resources Strategy.

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	Question 5	Mr James Finn (Barton Willmore Planning)	Planner St James Developments Ltd	Our client would support Option 2 as it provides the most flexible and non-restrictive approach to managing development in areas of high flood risk.
	Question 5	Mr Glenn Stewart	Assistant Director of Public Health Enfield Primary Care Trust	The favoured option is (2), to assess the scope for reducing and mitigating the problems of flooding, including naturalisation of watercourses and river restoration, as part of regeneration and development proposals.
	Question 5	Mr Giles Dolphin	Planning Decisions Manager Greater London Authority	The new plan should be in general conformity with London Plan Policies 4C.5, 4C.6 and 4C.7. The Council should have regard to these policies in determining the approach to river management and flood risk that is adopted in the new plan.
	Question 5	Mr Daniel Olliffe (Iceni Projects)	Principal Planner The Anderson Group	A Flood Risk Assessment submitted with a planning application is the clearest and most appropriate way of assessing the susceptibility of an area of land to flood risk. Accordingly the policy should not prevent development on sites where it can be demonstrated by the applicants, through a Flood Risk Assessment, that the site is unlikely to flood and is safe for residential occupation.
	Question 5	Ms Jill McGregor (GL Hearn)	Tesco Stores Ltd	Option 2
	Question 5	Amit Malhotra (RPS Planning)	Senior Planner Fairview New Homes Limited	Fairview object that housing should be strongly resisted in areas of high flood risk within the Lee Valley. Whilst it is accepted that the areas could be vulnerable to housing, a flood risk assessment could be undertaken to demonstrate that suitable mitigation could be implemented to prevent the risk of flooding. Fairview therefore request that any wording of a policy within the Core Strategy should state that proposals will be based on a site-by- site basis. Fairview supports the Council's proposal whereby it should assess the scope for reducing and mitigating the problems of flooding as part of any proposed development. Paragraph 26 of Planning Policy Statement 25: Development and Flood Risk (2006) stipulates that LPAs, advised by the Environment Agency and other relevant organisations should determine applications for planning permission taking account of all material considerations, including the issue of flood risk, the FRA [Flood Risk Assessment] prepared by the developer (when required) and proposals for reducing or managing that risk.
Green Belt, Open Space and Sports	5	Ms Claire Martin	Policy Officer Lee Valley Regional Park Authority	The Authority supports Strategic Objective 3 to protect and enhance the Green Belt and other open space within the Borough. Most of the Regional Park within Enfield is designated as Green Belt and this offers extra protection for the Park's openness and its recreational potential. The Authority also considers that Strategic Objective 4 should be modified to include the following wording as set out in bold: To create enhanced learning, leisure and recreational opportunities and improve access to green areas and the Lee Valley Regional Park and its facilities at identified locations.

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Green Belt, Open Space and Sports	5	Mr Alex Andrews	Principal Planner Transport for London	Walking and cycling should be promoted as far as possible across all of the borough's green belts and open spaces. These routes can often form high quality links between urban areas and residential and employment centres.
	Strategic Objectives	Mr Tony Watts	ECEN Representative Over 50s Forum	Third objective should be to set standards for maintenance of parks and apply them evenly across the Borough
The Green Belt	5.1	Dr Chris Jephcott	President The Enfield Society	All this is all very well but, like most of the documents under the new framework, it is long on intentions but short on specifics. The LDP with clear policies is a much more useful document. Support for the Green Belt and open spaces is welcome. Unfortunately, the actual condition of green areas such as Trent Park has deteriorated significantly in recent years due to reduced investment.
The Green Belt	5.1	Mr Alexander		5.1.9: Trent Park "contains", not "is" a historic country house, etc. Only "part of" the site is currently used as a campus
The Green Belt	5.1	Mr Jeff Field	Partner Cluttons LLP	The national policy objectives to retain attractive landscapes, and enhance landscapes, near to where people live (Paragraph 1.6, PPG2) needs to be balanced with the need to provide sustainable patterns of development, which may involve the loss of some Green Belt land (Paragraph 2.10, PPG2). This approach is supported by national housing policy, which highlights that where Green Belt boundaries have been drawn too tightly and that there may be a case for reviewing them where this would be the most sustainable option (Paragraph 68, PPG3). It is on this basis that the western part of the site at Arnold House, No. 66 The Ridgeway, Enfield EN2 8JA, is recommended for removal from the Green Belt. Site Description The site is located at the western edge of the built up area of Enfield. It is rectangular in shape with a 60 metre frontage to The Ridgeway. It is a large site comprising 1.36 hectares, of which approximately half is designated as part of the Green Belt, please refer Figure 1 (Location of nominated site for removal from the Green Belt and Green Belt Boundary). The eastern portion of the site contains an existing building and a number of mature and established trees. The western part of the site falls away to the west and southwest and comprises terraced gardens laid with grass, a disused tennis court, vegetable gardens and redundant outbuildings. Site Context and the Green Belt The site is adjacent to urban development, which extends along its southern, northern and eastern boundaries creating. The northern boundary of the site adjoins the rear gardens of properties off Woodridge Close, which contain buildings and other structures. Crofton Way housing estate extends along the entire southern boundary of the subject site. The Green Belt boundary has been drawn within the existing garden area of Arnold House. As evidenced by the figure above and confirmed on site, the true countryside starts at the western edge of the property boundaries, not within the properties themselves. The western part of the subject site is contained in a wedge of the nominated Green Belt area that is bordered on three sides by urban development. As a result there would be no loss to the openness to the Green Belt by development of this site as the existing openness is already limited by the adjoining urban development. The boundaries of the subject site are lined with a substantial number of trees and therefore any built development on this site would not be visually

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				<p>prominent. The western boundary of the site abuts the open countryside of Hogs Hill, which is also designated as Green Belt. The landscape to the west is characterised by rolling fields of crops, pasture and parkland, separated by hedgerows, with mixed conifer/broadleaf woodland areas of varying sizes. The northern, southern and eastern boundaries of this part of the Green Belt (as defined by the nominated site) are bordered by urban development. The relationship of the site and its surrounding area is explained by the aerial photograph provided as Figure 2 (Aerial photograph of the site and surrounding area). Local Policy Resulting from the matters raised above the following specific representations are made with reference to the Core Strategy Issues and Options Report. Policy 5.1 * This does not include the PPG2 advice which states that development which is not appropriate can be approved in very exceptional circumstances. This could set out allowing for example, development for residential care homes. * This representation is made in relation to this Policy as development of this site would support the soundness of the local plan making a proper provision for necessary development in the future (Paragraph 2.8, PPG2). * The Green Belt designation in this location is not several miles wide, as suggested by Paragraph 2.9 of PPG2. Development of this site would still provide an appreciable open zone all round the built up area of Enfield, which is consistent with the role and purpose of the Green Belt. * There are no other sites in this area that display the same unique characteristics in support of removal from the Green Belt designation. Development of this site at the edge of the Green Belt would support its fundamental role and provide a strong defensible barrier to further encroachment. Our evidence has shown that the above site does not display such unique characteristics that it should be kept permanently open and as part of the Green Belt (Paragraph 2.8, PPG2). * It is considered that the role of the western part of the Enfield Green Belt is to resist unrestricted sprawl, prevent neighbouring towns merging and to assist in safeguarding the countryside. Although there is a presumption for development on brownfield land, there is a finite supply of such land and it may not be in the most sustainable location for development. Such land may not always be deliverable due to complex ownership issues and remedial costs that may be necessary.</p>
The Green Belt	5.1	Dr Steve Dowbiggin	Chief Executive Capel Manor College and Gardens	<p>Summary: There is an anomalous boundary to the north of 66 The Ridgeway. It seems to us that this is an anomalous boundary where it would be much more sensible to join the existing housing/garden lines, thereby releasing two thirds of the areas so it can make a contribution towards providing houses to enable Enfield to meet its "housing" targets.</p>
The Green Belt	5.1	Ms Claire Martin	Policy Officer Lee Valley Regional Park Authority	<p>The Authority supports Strategic Objective 3 to protect and enhance the Green Belt and other open space within the Borough. Most of the Regional Park within Enfield is designated as Green Belt and this offers extra protection for the Park's openness and its recreational potential. However the Authority is keen to ensure that this designation does not prejudice its remit to provide regional sport, recreation and leisure facilities as well as nature conservation and therefore welcomes the statement in paragraph 5.1.3 that special provision is also required to be made for intensive recreational uses in the Lee Valley Park, as identified in the Park Plan. Paragraph 5.1.5 states that in the Lee Valley area there may be some very special circumstances which could justify a strategic review of the Green Belt boundary. Any such review of the Green Belt boundary will need to be carried out as part of the LDF process. The Authority would be interested, with regard to its wider remit, in reviewing the Green Belt boundary at Pickett's Lock and the area in the vicinity of the North</p>

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				Circular. The Authority would also wish to see new developments acknowledge their location adjoining the Park and provide additional areas of open space that extend the Regional Park.
The Green Belt	5.1	Mr Hugh Small		Summary: There is an error in the Green Belt boundary at the rear of 6-12 Beech Hill and 411-419 Cockfosters Road. The Green Belt should extend into the gardens of these houses, taking in all but the original half-acre plots of the houses concerned.
The Green Belt	5.1	Mr Robert Pott		Summary: A strip of land between Whitewebbs Park and the M25 will be suitable for development within the next 10 years. This land should be identified within the LDF as land to be safeguarded for development within the next 5-10 years.
The Green Belt	5.1	Ms Anna Chapman	Planner British Waterways- London Region	Waterways and waterbodies have an inherent constraint in that they are non footloose assets as their location and alignment are fixed. Marinas and mooring basins are seen as essential facilities to support the use of the waterways for tourism and leisure, and are part of the waterway infrastructure and therefore, are vital for the long term sustainability of the waterway network. For waterways to be successful catalysts for sustainable regeneration and diversification boaters need to cruise through Green Belts and other designations to gain access by water from urban areas to rural and therefore require mooring facilities on route. BW considers that marinas and their associated facilities, as a form of outdoor recreation and much needed accommodation for tourists, should be permitted in the green belt. There is therefore the potential to provide canal based recreational facilities including moorings/ marinas within the greenbelt to enhance the recreational offer of the Lee Valley. Furthermore, there is a national shortage of secure offline moorings (moorings located off the navigational channel in a lay-by, mooring basin or marina) as acknowledged in early versions of PPG 17 on Planning for Sport and Recreation and British Waterways publication entitled Waterways and Development Plans (February 2003) (accepted as a material consideration in the appeal British Waterways vs Sandwell Metropolitan Borough Council ref: APP/G4620/A/04/1150056). Since 2000 growth in online moorings has outpaced offline. A major reason for slower growth in provision of offline moorings to meet the growing demand is difficulty in obtaining planning consent. Boaters prefer the security and greater amenity of offline moorings and other boaters using the waterways prefer not to have to travel long distances past permanently moored boats. Offline moorings also reduce the bank space available to anglers.
Open Spaces	5.3	Mr Donald Alexander	Hon Secretary Chalk Lane Area Residents' Association	5.3.5 Here and elsewhere figures are quoted per 1.000 population, but over what area this is to apply?
Open Spaces	5.3	Mr Alexander		5.3.5: Here and elsewhere figures are quoted per 1,000 population, but over how small an area do they apply? 5.3.8: 10 sq m of playspace per child seems very high
Open Spaces	5.3	Ms Claire Martin	Policy Officer Lee Valley Regional Park Authority	Open Space Hierarchy (para 5.3) - the Authority is concerned that the proposed hierarchy for open space should reflect the role and function of the Regional Park. The Council are proposing to classify open spaces as either Public Open Space- where there is established and unrestricted public access or as Private Open Space where public access is restricted or not formally established. Open Space within the Regional Park is classified as the latter. An exception to the

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				broad definition should be made to reflect the Authority's endeavours, in partnership with the Council, to increase public access to the Park through a series of open space and access improvement projects. There is also an issue about the quality of open space that needs to be addressed. The quality of open spaces needs to be maintained to encourage people to use them and to ensure their continued contribution to the quality of an area.
Open Spaces	5.3	Ms Anna Chapman	Planner British Waterways- London Region	In accordance with PPG 17 canals and their towpaths form public open spaces. As such the River Lee Navigation and its towpaths have the potential to play an ever increasing role in providing leisure and recreation opportunities and enhancing the quality of life of the borough. BW has leisure interests at the very heart of our business. BW is developing strategies to review key destinations and plan for improvements to visitor attractions and to create long-term plan for new leisure business opportunities. Examples of cultural, leisure and tourism opportunities on the inland waterways network include boating, moorings, walking, cycling, jogging, angling, trip boats, theatre boats, floating art galleries, guided walks, cafes, water festivals, etc. BW always aims to ensure that these elements are at the heart of major mixed use developments that it can control or it can influence. BW Waterspace Strategies will seek to deliver high quality mixed use development incorporating and/or complementing cultural quarters and creative clusters, e.g. based around waterside heritage, canal museums, boat festivals, theatre barges, etc. BW therefore requests the Council and developers discuss the potential of these sites at an early stage and encourages the Council to require developers to submit Waterspace Strategies as part of development frameworks, master plans, planning applications, etc. so that comprehensive waterspace strategies can be prepared to ensure the development integrates with and animates the waterspace, thus ensuring the potential of their canal side location is fully maximised. The River Lee Navigation should also be recognised as a tourism destination for day excursions. They provide extensive opportunities for water-based recreation as well as walking and cycling. Furthermore, with additional boating and general canal-related facilities the waterway corridor can offer opportunities for longer stays. The tourism opportunities and demand for the waterways will be further increased as a result of the Olympics. These points further justify the need for additional moorings in the borough.
Open Spaces	5.3	Meeting: ECEN 26.07.07		Allotments should be protected.
Playing Pitches and Indoor Sports Facilities	5.4	Ms Claire Martin	Policy Officer Lee Valley Regional Park Authority	Sports and recreational facilities the Core Strategy needs to consider sports and recreation facilities other than playing pitches and indoor sports centres to reflect the contribution that the Park can make to regional sporting and recreational needs.

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Your Views	5.5	Ms Georgie Cook	Town Planning Administrator Thames Water Property Services	Questions 10 and 11- Metropolitan Open Land and Open Space. Thames Water have a number of essential operational sites in Enfield with Green Belt, MOL and with Open Space designations, for example, Chingford South Water Treatment Works, William Girling Reservoir and King George V Reservoir. Our sites may require future development and expansion to meet environmental, social and economic change, standards specifically those posed by population and economic growth, tighter environmental standards and from the impacts of climate change. Thames Water's experience at strategic water and sewage treatment sites in the MOL, Green Belt and protected open space, is that there is a lack of recognition of the functions of sewage and water treatment and this often leads to delay in obtaining necessary planning consents for essential operational development. It is essential that there is provision of adequate water and wastewater infrastructure to service existing and new development to avoid unacceptable impacts on the environment. With potential delays to achieving the necessary upgrades to our assets, the ability of our infrastructure to provide water and to treat additional wastewater flows to the required regulatory standards, is undermined. As highlighted in the Planning Inspectorate's published document Development Plans Examination A Guide to the Process of Assessing the Soundness of Development Plan Documents, to achieve a sound DPD adequate account should be taken of the relationship between the proposals in the DPD and other requirements, such as those of utility companies and agencies providing services in the area, including their future plans or strategy and any requirements for land and premises. The following policy is strongly recommended to be included in the Core Strategy:- Green Belt, Metropolitan Open Land and Open Space designations are not intended to restrict potential plans of organisations such as Thames Water in carrying out their statutory functions.
Your Views	5.5	Mr Alexander		There is a need for a robust strategic vision and plan for Trent Park, possibly an "Area Action Plan" Many of the new sports facilities should be built on the flood planes rather than putting new houses there
Your Views	5.5	Chief Inspector Stuart Palmer	Police Partnerships Metropolitan Police	I would suggest some more details could be placed here about keeping open places safe by working in partnerships with LBE, Parks police, Enfield Police, Leisure services, businesses and Friends of parks.
	Question 6	Mr Tony Watts	ECEN Representative Over 50s Forum	1. Review should be carried out to make more effective use of the water resources in the Lee Valley for Leisure and recreational purposes. Consideration of scope for the development of a water theme park could be considered. 2. More/joined up cycle tracks/lanes would be of real benefit to borough residents
	Question 6	Dr Chris Jephcott	President The Enfield Society	No need to review boundary NW Enfield. Limited scope for changes Lea Valley, where some areas serve no Green Belt or MOL purpose.
	Question 6	Mr Alan Melhuish	Advocate	Green Belt para 5.5 Views Reviewing : There is no need to review existing boundaries. Preservation and maintenance measures should be confirmed and any commercial sports developments proposed resisted. Likewise any proposal to promote residential developments along waterways and frontages should be resisted.
	Question 6	Mr Andrew Newman	Forty Hill and Bulls Cross Study Group	No need to reassess the NW GB. To the East there is a concern about the Olympic facilities impact and legacy issues.

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	Question 6	Mr Hammett	Environment and Landuse Advisor National Farmers Union	Green Belts have generally supported countryside protection and the concentration of urban areas for many years and they have generally been successful. The particular quality of landscape is due in no small part to the farming practices within them. In any discussion of Green Belt boundary changes, the operational needs of businesses within the designation must be considered. In the past there have been lower approval rates for farm diversification schemes in Green Belt areas as compared to other rural areas. The key land management role that farming performs in maintaining the countryside within the Green Belt must be given greater recognition particularly as the protection of this landscape is central to Green Belt policy. Green Belt policy therefore needs to be sensitive to the: -need to recognise farm diversification as well as mainstream agriculture as an appropriate activity in the Green Belt; -pressures and difficulties experienced by farmers in the urban fringe; -plethora of landscape designations which can often accompany Green Belts; -uniqueness of farm businesses which, in many cases, can straddle Green Belt boundaries and have to cope with different policy environments; -need to address redundant farms with positive rural development policies (this issue is particularly pertinent given the exclusion of farm-land/buildings from the current definition of "brownfield land"); -restrictive, and at times, harsh development control regime, within Green Belts combined with a surprising degree of variability and inconsistency in decisions relating to "small-scale" development; and, -consequences of Green Belts being displaced as a result of review exercises and new controls being applied to farm-land previously outside the designation.
	Question 6	Mr Graham Murdoch	Director Murdoch Associates	32, 34, 36 and 40 Beech Hill should be excluded from the Green Belt. Continuing to apply the designation to these sites does not assist in achieving the purposes for including land within the Green Belt as set out in Planning Policy Guidance note two (PPG2).
	Question 6	Mr James Finn (Barton Willmore Planning)	Planner St James Developments Ltd	Our client would like to take this opportunity to remind the Council of the guidance in PPG2: Green Belts, which considers that in order to protect the Green Belt in the longer term, land should be safeguarded between the existing built up area and the Green Belt, to meet longer-term development needs. PPG2 advises in paragraph 2.12 that: When local planning authorities prepare new or revised structure and local plans, any proposals affecting Green Belts should be related to a timescale which is longer than that normally adopted for other aspects of the plan. In preparing and reviewing their development plans authorities should address the possible need to provide safeguarded land. The Council should therefore review the Green Belt boundaries for areas of land that if developed would entail the setting of a more defensible boundary for the Green Belt that would takes longer term needs in to account. For these reasons our client would therefore recommend that the Green Belt boundaries in the north west of the Borough and in the Lee Valley in the East should be reviewed. This must be seen as a necessary part of meeting the challenges of the revised housing figures contained within the Early Alterations to the London Plan and Planning Policy Statement 3 Housing.
	Question 6	Mr Will Thompson	Associate Director - Planning White Young Green	Hadley Wood Golf Club considers that there is a need to review Green Belt boundaries and Enfield's policies in the north west of the borough. A It suggests that any such review should address the extent to which the existing boundary situated adjacent to Beech Hill serves the purpose of including land within the Green Belt; fulfils the objectives of the use of Green Belt land; and assists in meeting longer term strategic development needs.

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	Question 6	Ms Barbara Aldridge	Chairman Enfield Lock Conservation Group	The Green Belt land, Metropolitan open Land and the Lee Valley Park are essential recreational areas for the denser populated areas of Eastern Enfield. The loss to development of any land in this area should not be tolerated. Only increase in designated land is appropriate for review. There should not be any housing or industry on Ramney Marsh.
	Question 6	Mr Patrick Blake	Network Strategy Highways Agency	The HA would expect that local planning authorities will assess the impact on the SRN of greenbelt growth options. We would also expect to see emerging policies that would minimise demand at the source and require the mitigation of SRN impacts throughout all stages of development planning, implementation and operation. This is particularly relevant to greenbelt areas where alternative transport choices tend to be limited, resulting in levels of reliance on the private being much higher than in urban centres. The HA recognises that new public transport hubs facilitating the use of non-car modes could be developed over time, however this process is likely to require very substantial investment.
	Question 6	Mr Giles Dolphin	Planning Decisions Manager Greater London Authority	The new plan should be in general conformity with London Plan policy 3D.8 which states that the Mayor will maintain the protection of London's Green Belt and that proposals for alterations to Green Belt boundaries should be considered through the plan making process. The review of Green Belt Boundaries at this time is therefore supported and should result in a robust and defensible boundary in the new plan.
	Question 7	Mr Alan Melhuish	Advocate	Farm diversification depends on the nature of farm practice that will be needed, particularly if it is industrialised or mechanised processing.
	Question 7	Dr Chris Jephcott	President The Enfield Society	Diversification schemes should use existing, not additional buildings. Locally specific criteria should include effect on landscape, views, accessibility and long term sustainability of uses.
	Question 7	Mr Andrew Newman	Forty Hill and Bulls Cross Study Group	Diversification of farming units should be judged by criteria including traffic and transport links, impact to the environment, impact to the landscape, impact to the built environment.
	Question 7	Mr Hammett	Environment and Landuse Advisor National Farmers Union	The NFU welcomes the proposals for a robust policy in favour of rural diversification. To maintain a vibrant countryside, we need policies that harness food and energy crop production with opportunities for farm diversification and stewardship of the local environment by farmers. The NFU encourages policy objectives which provide a framework for alternative and supportive uses to the main agricultural business. The Government supports the re-use of existing buildings in the countryside and the NFU also encourages the sensitive restoration and conversion of historic farm buildings for farm diversification projects and housing. There are options for employment development in the countryside through the conversion of existing buildings for small businesses. There is an opportunity to explore positive rural development policies for farmyards, including housing development. This issue is particularly pertinent given that land and buildings currently in use for agricultural or forestry purposes are excluded from the brownfield definition. Diversification options are constantly evolving, particularly with opportunities to supply renewable energy. There is a growing trend for farmers to store and supply biomass for heating public buildings such as schools. Generally, planning policies should be supportive of rural retail, particularly farm shops which promote locally produced sustainable food sources and tourism opportunities such as fishing lakes which combine environmental and economic benefits. The plan also correctly identifies the

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				key educational role that farming must play. Defra's Year of Food and Farming will run through the next academic year and is aimed at helping children learn more about the origins of their food. Although there is a general trend indicating increased demand for organic produce, organic systems do not suit all land types and business arrangements. The benefits of conventional farming operations in the Green Belt must also be recognised.
	Question 7	Dr Chris Jephcott	President The Enfield Society	Diversification schemes should use existing, not additional buildings. Locally specific criteria should include effect on landscape, views accessibility and long term sustainability of uses.
	Question 7	Mr Giles Dolphin	Planning Decisions Manager Greater London Authority	London Plan policy 3D.14 supports farm diversification and requires that policies promoting this be consistent with other policies in the development plan on matters such as transport and sustainable development.
	Question 8	Mr Tony Watts	ECEN Representative Over 50s Forum	Trent Park. Allow areas for existing non-heritage buildings on the University Campus to be demolished and replaced for educational needs and further developed as campus. Trent Park as a green space to be preserved but with improved cycle tracks to encourage visitors to arrive under their own power rather than by car.
	Question 8	Dr Chris Jephcott	President The Enfield Society	The effect of any changes on the Green Belt should be the paramount consideration.
	Question 8	Mr Peter O'Brien	Partnership Manager Learning Skills Council	We would support the preservation of Trent Park for primarily educational purposes
	Question 8	Dr Frederic Clark	Hon. Secretary Trent Park Conservation Areas Advisory Committee	There is a need for a robust vision and plan for Trent Park, possibly an "Area Action Plan"
	Question 8	Mr Andrew Newman	Forty Hill and Bulls Cross Study Group	The plan should state that the intention is to stabilise the major developed sites in the Green Belt and a coherent, agreed plan should be put in place for the management of the sites with a view to Conservation (history and environment) and enhancement of those areas. Future development should be subject to such a plan being in place.
	Question 8	Ms Barbara Aldridge	Chairman Enfield Lock Conservation Group	The Green Belt land, Metropolitan open Land and the Lee Valley Park are essential recreational areas for the denser populated areas of Eastern Enfield. The loss to development of any land in this area should not be tolerated. Only increase in designated land is appropriate for review. There should not be any housing or industry on Rammey Marsh.

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	Question 8	Mr Giles Dolphin	Planning Decisions Manager Greater London Authority	In considering the future of Major Developed Sites in the Green Belt the new plan should principally have regard to the protection and enhancement of the Green Belt in all cases. London Plan policy 3D.8 states that the Mayor will maintain the protection of London's Green Belt. The supporting text for this policy (Paragraph 3.247) states that the quality of land within the Green Belt is not a reason in itself for excluding land from the Green Belt or allowing development and that, where Green Belt land is of poor quality, steps should be taken to improve it. Therefore in the case of Major Developed Sites in the Green Belt a proactive approach to their improvement and the protection of the Green Belt would be supported.
	Question 8	Mr Alex Andrews	Principal Planner Transport for London	The borough should be promoting sustainable transport modes including walking and cycling to access major developed sites in the green belt. Where possible these sites should have developed travel demand management measures.
	Question 9	Mr Tony Watts	ECEN Representative Over 50s Forum	Support taking a proactive approach to exploiting Crews Hill. Coupled with further development Capel Manor as a horticultural centre of expertise it would seem that there is considerable scope for improving employment in the borough. Access to Crews Hill needs to be reviewed.
	Question 9	Dr Chris Jephcott	President The Enfield Society	We favour Option 2. The existing approach (Option1) has largely failed. We acknowledge the area's employment and commercial activities. Some are appropriate, some completely inappropriate.
	Question 9	Dr Chris Jephcott	President The Enfield Society	We favour option2. The existing approach (Option1) has largely failed. We recognise the area's employment and commercial activities. Some are appropriate, some completely inappropriate.
	Question 9	Mr Patrick Blake	Network Strategy Highways Agency	A study to consider the current enforcement and traffic issues in Crews Hill has been commissioned to help review the long term future of the Crews Hill area. The Core Strategy Consultation Report states that Crews Hill attracts shoppers from across north London and south Hertfordshire. Following this the HA expects that impact on the SRN and consideration of sustainability options are included in the study which has been commissioned by the Council and is due for completion in later this year.
	Question 10	Dr Chris Jephcott	President The Enfield Society	We think there is no need to review existing designations.
	Question 10	Mr James Finn (Barton Willmore Planning)	Planner St James Developments Ltd	All the designations of Metropolitan Open Land should be reviewed to ascertain if they are still viable and functioning in line with their intended purpose. Those areas of Metropolitan Open Land that are not fulfilling their purpose should be considered for alternative purposes. This must be seen as a necessary part of meeting the challenges of the revised housing figures contained within the Early Alterations to the London Plan and Planning Policy Statement 3 Housing.
	Question 10	Ms Barbara Aldridge	Chairman Enfield Lock Conservation Group	The Green Belt land, Metropolitan open Land and the Lee Valley Park are essential recreational areas for the denser populated areas of Eastern Enfield. The loss to development of any land in this area should not be tolerated. Only increase in designated land is appropriate for review. There should not be any housing or industry on Rammey Marsh.

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	Question 10	Mr Giles Dolphin	Planning Decisions Manager Greater London Authority	The new plan should be in general conformity with London Plan Policy 3D.9 which states that the Mayor will maintain the protection of Metropolitan Open Land from inappropriate development. Where land currently designated as Metropolitan Open Land continues to satisfy one or more of the criteria set out in the policy the designation should remain.
	Question 11	Mr Tony Watts	ECEN Representative Over 50s Forum	I object to this classification. Once private open space is so designated it raises the spectre of land banking for future planning change of use.
	Question 11	Dr Chris Jephcott	President The Enfield Society	We support this principle and cannot suggest more appropriate alternative classifications.
	Question 11	Mr Andrew Newman	Forty Hill and Bulls Cross Study Group	Should not be split into private and public. Private implies restricted use and not accessible, this is not true in many cases. Perhaps public and general open space?
	Question 11	Ms Karen Foster-	Planning Liaison Officer Environment Agency	We are unsure as to how classifying Open Space into the categories of public and private open space will contribute to achieving this objective. The London Plan establishes guidelines for open space hierarchies. It states, for example, that Regional Parks should be at least 400 hectares in size and be between 3.2 -8 kilometres from people's homes. Small open spaces should be less than 2 hectares in size and under 400 metres from people's homes. This would also help meet the Natural England target of providing accessible open space within 5 minutes or 300 metres of everyone's home. The plan should recognise the need to enhance biodiversity in open spaces and manage them in an integrated manner. The open space in Enfield should maintain and enhance biodiversity to ensure that development and implementation results in a net gain of Biodiversity Action Plan habitats. They should function as multifunctional green spaces being designed to high standards of quality and sustainability to accommodate nature, wildlife and historic and cultural assets and provide for sport and recreation. Section 221 of the NLSRDF states that all development in North London should generate a net increase in quality and quantity of wildlife habitat Action 4E states that in their boroughs LA are asked to identify area of deficiency in access to nature and indicate how these can be addressed.
	Question 11	Mr Giles Dolphin	Planning Decisions Manager Greater London Authority	The principle of classifying open space as public or private space as part of a comprehensive open space hierarchy in the new plan is supported. The overall open space hierarchy should have regard to London Plan Policy 3D.10 and the London Plan draft Supplementary Planning Guidance on Providing for Children and Young People's Play and Informal Recreation.
	Question 11	Amit Malhotra (RPS Planning)	Senior Planner Fairview New Homes Limited	Fairview would support the classification of open space as Public Open Space, as a means to help meet the demand of future provision.

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	Question 12	Mr Tony Watts	ECEN Representative Over 50s Forum	
	Question 12	Dr Chris Jephcott	President The Enfield Society	It is not clear how the proposed benchmark standards relate to existing provision, so difficult to comment. Certainly we believe there should be no overall reduction. Once lost open space is hardly ever replaced.
	Question 12	Mr Peter O'Brien	Partnership Manager Learning Skills Council	We support the planned use of open spaces and, in particular, improvements in the access to play areas. We hope that this leads to employment opportunities around the management of green spaces and the organisation of managed play activities.
	Question 12	Mr Andrew Newman	Forty Hill and Bulls Cross Study Group	I think there should be a minimum size, ie what is suitable for a playground etc. It is also key that there is follow up on conditions to ensure they are fulfilled.
	Question 12	Ms Karen Foster-	Planning Liaison Officer Environment Agency	Setting a standard for provision of public parks of 2.43 hectares per 1,000 population is a reasonable target, but only beneficial if people use the parks. A better benchmark would be to provide accessible open space within a certain distance of home. Human physical inactivity has an indirect cost to the UK economy of over Â£8 billion. Increasing the amount physical activity undertaken by 10% could save around Â£500 million to the UK economy. An objective should be set to address this and highlight the benefits of a healthy society. Modern society means that people have less time on their hands to exercise so accessible open space close to home will help address this. Natural England has a campaign to encourage provision of accessible open space within 5 minutes (300m) of homes (see link). http://www.naturalengland.org.uk/press/news2007/090107.htm
	Question 12	Mr James Finn (Barton Willmore Planning)	Planner St James Developments Ltd	Any requirement in the new plan for the provision of open space to be provided by developments to be assessed against bench mark standards, should also be assessed against Circular 05/05, i.e. any requirement sought should be: (i) relevant to planning; (ii) necessary to make the proposed development acceptable in planning terms; (iii) directly related to the proposed development; (iv) fairly and reasonably related in scale and kind to the proposed development; and (v) reasonable in all other respects. Furthermore, in accordance with paragraph B9 of Circular 05/05, planning contributions should not be sought to address existing deficiencies. The provision of open space should therefore only be sought where it can be demonstrated that it is required to mitigate an adverse impact that a development would have on open space.
	Question 12	Mr Giles Dolphin	Planning Decisions Manager Greater London Authority	The proposed standards emerging from the Council's Open Space Study should be reviewed in light of the subsequent publication of the London Plan draft Supplementary Planning Guidance on Providing for Children and Young People's Play and Informal Recreation. The preferred approach should be in general conformity with this guidance.
	Question 12	Amit Malhotra (RPS Planning)	Senior Planner Fairview New Homes Limited	Fairview objects to the standards set out for the demand for open space. Any provision for a proposal as a result of a development should be based on a site-by-site basis.

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	Question 13	Mr Tony Watts	ECEN Representative Over 50s Forum	Provided amenity spaces remain as Local Authority land.
	Question 13	Dr Chris Jephcott	President The Enfield Society	Yes, but also from public purse.
	Question 13	Mr Peter O'Brien	Partnership Manager Learning Skills Council	We have also made relevant comments in answer to the previous question. We urge that consideration is given to linking developments in the use of open spaces with the growing supply of graduates in sports management and leadership from our colleges. The development of land with the availability of skilled, qualified leader and coaches raises the potential of many more managed play activities across the Borough.
	Question 13	Mr Andrew Newman	Forty Hill and Bulls Cross Study Group	Partly agree. Areas should be identified and reserved for open spaces. A programme should be put on place to create these open spaces but this can be accelerated by developer contributions.
	Question 13	Ms Karen Foster-	Planning Liaison Officer Environment Agency	We are supportive of the principle of seeking to secure improvements to deficiencies in open space and children's play provision through developer contributions.
	Question 13	Mr James Finn (Barton Willmore Planning)	Planner St James Developments Ltd	In accordance with paragraph B9 of Circular 05/05, planning contributions should not be sought to address existing deficiencies. Planning contributions should only be sought where it can be demonstrated that funding is required to mitigate an adverse impact that a development would have on an open space.
	Question 13	Mr Giles Dolphin	Planning Decisions Manager Greater London Authority	The principle of seeking to secure improvements to deficiencies in open space and children's play provision through developer contributions is fully supported. London Plan draft Supplementary Planning Guidance Providing for Children and Young People's Play and Informal Recreation supports the principle of seeking to secure improvements to deficiencies in open space and children's play provision through developer contributions and sets out a methodology for doing so. The proposals in the new plan should be in general conformity with this approach.
	Question 13	Amit Malhotra (RPS Planning)	Senior Planner Fairview New Homes Limited	Fairview object to the Council proposing specific contributions from proposed residential development with regards to open space and children's provision. It is acknowledged that Circular 05/2005 encourages the use of standard charges and formulae to give greater certainty to developers. However, in stating figures, the Council should only use indicative targets or examples and should not state required amounts. The use of obligations in this way could stifle smaller developments coming forward. Fairview therefore request that an additional paragraph should be added to any policy that clearly states that these are possible guide levels of contribution only. Fairview request that should the use of planning contributions be used to secure improvements to the deficiencies in open space and children's play provision, policy should conform to Central Government guidance issued in Circular 05/2005. The need for such provision should be applied on a site-by-site basis and planning obligations should adhere to the tests that they should be: i) relevant to planning; ii) necessary to make the proposed development acceptable in planning terms;

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				iii) directly related to the proposed development; iv) fairly and reasonably related in scale and kind to the proposed development; and v) reasonable in all other respects. Fairview request that the document recognises the impact that planning obligations can have on the viability of development. As such, the following text should be included in policies related to the provision of developer contributions: The Council will have regard to the impact of planning contributions on the viability of development and will ensure that they are necessary to allow consent to be given for a particular development and that they are fairly and reasonably related in scale and kind to the proposed development, and reasonable in all other respects.
	Question 13	Gary Thomas (Planning Works Ltd)	Lionsgate Properties	No. Developer contributions should only mitigate against any impacts arising from specific developments.
	Question 14	Mr Tony Watts	ECEN Representative Over 50s Forum	Support option 2
	Question 14	Dr Chris Jephcott	President The Enfield Society	We prefer Option 1.
	Question 14	Mr Alan Melhuish	Advocate	Playing Pitches suggestions that there may be a surplus of provision in the future should not mean that such places are allocated to be redeveloped solely as housing. Evidence supporting this contention of a surplus should be given as it contradicts the needs of an expanding population.
	Question 14	Mr Peter O'Brien	Partnership Manager Learning Skills Council	Option 1 is preferred. It is unclear from the evidence provided whether the sites described are supported by facilities that permit residents to use the play and sports sites for a variety of purposes. For example, are the sites equipped with basic facilities that only permit casual use or are there arrangements for supervision and coaching that allows Enfield residents to develop sporting proficiency, even to elite performance standards. It is also unclear whether the employment and training potential of the sites mentioned in this section of the plan have been fully assessed
	Question 14	Mr Andrew Newman	Forty Hill and Bulls Cross Study Group	Neither
	Question 14	Mr Giles Dolphin	Planning Decisions Manager Greater London Authority	The planning of all types of open space, including playing pitches, should be actively managed through an open space strategy as required by London Plan Policy 3D.11. This should balance supply and demand for all type of open space across the Borough and firmly managed changes in the type of provision, related development, re-provision, and the provision of new space in response to identified deficiencies. This approach should be rigorously applied and fully supported by the new plan.

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	Question 14	Amit Malhotra (RPS Planning)	Senior Planner Fairview New Homes Limited	Fairview supports a less stringent approach to actively identify surplus land for other open space and other uses. Paragraph 1 of Planning Policy Guidance 17: Planning for Open Space, Sport and Recreation (2002) stipulates that LPAs should undertake robust assessments of the existing and future needs of their communities for open space, sports and recreational facilities. Indeed, the Enfield Open Space and Sports Assessment (Atkins, 2005), which provides a comprehensive appraisal of open space, indoor and outdoor sports, recognises that Enfield has a relatively high public park provision for an outer London Borough. It is noteworthy that Fairview has a proposal (currently remains undetermined by the LPA) for a particular development in the former playing fields site that has been redundant for over 12 years. Consequently, over this period of time, the site has remained dormant and has not functioned as an area nor contributed to the Borough's open space provision. Though the application was for residential development it would also provide a high quality sports pitch and would return valuable publicly accessible open space. In so doing, this would provide substantial benefits to the recreational life of the local community. Fairview support the proposal to review existing open spaces (in accordance with PPG17) and consider options for redevelopment, such as housing on identified under-used public open space. As identified in the Town Centre AAP, there could be an opportunity to consolidate existing uses, such as the St Anne's School, which given the good transport links would provide a suitable site for residential development. Notwithstanding the release of surplus open space for redevelopment opportunities, Fairview considers that it is equally important, in accordance with paragraph 24 of PPG17, that 'local authorities should seek opportunities to improve the local open space network, to create public open space from vacant land, and to incorporate open space within new development on previously-used land'. The LPA should also 'consider whether use could be made of land that is otherwise unsuitable for development'.
	Question 14	Gary Thomas (Planning Works Ltd)	Lionsgate Properties	Option 1.
Introduction	6	Ms Claire Martin	Policy Officer Lee Valley Regional Park Authority	The Regional Park will play a key role in providing quality environment that will form the back drop to new developments in Enfield and the rest of the Upper Lea Valley.
Introduction	6	Ms Barbara Aldridge	Chairman Enfield Lock Conservation Group	A map showing densities of population throughout Enfield would be a helpful illustration particularly in this section.
Introduction	6	Mr Graham Saunders	Senior Regional Planning Advisor English Heritage - London Region	The New Enfield as defined by the plan covers an area which contains a range of heritage assets, within the context of a wider historic environment. A key issue which is of topical importance relates to the historic value of the suburbs. English Heritage's recent publication Suburbs and the Historic Environment (2007) encourages local authorities to develop a long term strategy for the future of historic suburbs that ensure their significance is retained, and enhanced. This includes understanding what is there and using control mechanisms carefully to help retain the local

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				distinctiveness of the suburbs where there is historic value.
Introduction	6	Chief Inspector Stuart Palmer	Police Partnerships Metropolitan Police	New Enfield should include a section on crime reduction to reflect the community's priorities. We are happy to assist with content. I note the small para in last quarter of P27 but this could be expanded with it's own section of the report to signify the importance of the issue in this area.
Introduction	6	Mr Glenn Stewart	Assistant Director of Public Health Enfield Primary Care Trust	Good to note that the new road proposals will seek to improve the environment for areas near the road. The challenge will be in how this is done. Think the line Enfield will seek to be one of the safest boroughs in London should be re-phrased as it is. How about 'will seek to continue to be one of the safest?'. It is useful to note the vision of developing a 21st century economy focused on green technology and the development of renewable energy schemes.
Introduction	6	Mr Alex Andrews	Principal Planner Transport for London	6 New Enfield: As with the previous sections of the LDF opportunities to develop and enhance the transport network should be given greater emphasis. Public transport along the key corridors and within core growth areas should be made a priority. The borough should be encouraging a diverse range of transport choices and considering alternatives to rival use of the private motor car. The borough should be working with the strategic authorities, developers and the local community to enhance a wide range of transport opportunities in the borough. Note: TfL is currently developing a Network Management Plan (NMP) for the A10 that will provide a template for improving transport links along its corridor. The NMP will look at demand and capacity across all modes and will look at not only the corridor itself but also at how east-west links can be improved. It will attempt to prioritise transport objectives by weighting them accordingly. It may be appropriate for the LDF to make reference to the NMP as the borough is involved in its preparation.
Introduction	6	Meeting: ECEN 26.07.07		Participants indicated that they were unhappy about the proposal for all new buildings to be in the New Enfield area; they also expressed concern that there is nothing in the Plan about new buildings being of a style and quality in keeping with this area
Housing	7	Mr Norman Smith	Coombehurst Close Residents Association	A prescriptive approach conflicts with independent choices exercised by residents. Trying to minimise housing differences implies holding back those which are "better" while improving those which are of a "lower standard". Population increase is not inevitable. Lower housing densities could discourage extra pressure.
Housing	7	Mr Matthew Roe (CgMs)	Senior Associate Director Metropolitan Police Authority	The MPA have a shortage of suitable, available residential accommodation for young police officers. The MPA are therefore keen to see quantum of intermediate housing suitable for key workers, and therefore police officers, maximised. The MPA therefore support a definition of affordable housing, which is consistent with the London Plan, and includes intermediate housing. The MPA supports the Council's use of the definition of Key Workers as defined within the Key Worker Living Programme (as indicated in the glossary at Appendix 6) which includes Police officers, Community Support Officers and some civilian staff.

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Housing	7	Mr Daniel Olliffe (Iceni Projects)	Principal Planner The Anderson Group	In relation to housing provision within the Borough, the site search exercise undertaken for The Anderson Group has revealed that there are few large sites available for comprehensive redevelopment within the Borough. Housing policies should include a degree of flexibility to ensure that each site can be considered on its merits. In this regard a one rule for all approach cannot work in every instance. The Core Strategy must take a more pragmatic approach in understanding the operations of the market and using this approach to provide a desired rate of delivery.
Introduction	7.1	Ms Anna Chapman	Planner British Waterways-London Region	The demand for boats for residential use is showing particularly strong demand. A survey of boat owners licensed to use BW waterways in 2004 suggests that 9% of all boats with long term moorings are used as the primary residence. Para 4.117 of the London Plan acknowledges the need for and the shortage in supply of residential moorings in London and Waterways and Development Plans states that although limited in number, residential moorings represent an element in the government's drive towards an increased choice in housing types providing for a variety of lifestyles. It is important therefore, that we achieve the right mix and variety of boats and uses to sustain a vibrant and dynamic inland waterways system.
Introduction	7.1	Mr Alex Andrews	Principal Planner Transport for London	A strategic objective for the LDF should be to locate new housing development close to transport links and corridors, in particular within more built up urban areas. The relationship between housing density and provision of transport infrastructure should be clearly defined.
	Strategic Objectives	Dr Chris Jephcott	President The Enfield Society	Suggest Strategic Objective 5. be modified in line with 7.1.1. above to read 'To provide high quality, well designed and sustainably constructed new homes etc.'
	Strategic Objectives	Mr Mark Hayes	The Chair Enfield Housing Association Forum	It is imperative that the plan maximises the provision of affordable housing in the Borough in order to meet local needs, with the majority of new provision being for rent. The Housing Study undertaken by Fordham Research, February 2006, found a shortfall of 2,954 affordable dwellings per annum across Enfield. There is a particular need for family sized housing in all types of tenure.
Protecting and Improving the Housing Stock	7.2	Ms Anita Brookes		Your report states:" The borough is ranked within the worst 6% for overcrowding in England and Wales ¹⁷ . Enfield has a high level of vacant stock and homeless households in temporary accommodation. 8.5% of all households within the borough are on the housing register." Therefore it is a grave mistake to continue to build new properties in this already overcrowded borough. It is becoming an unpleasant place to live due to traffic congestion and crowds.
Protecting and Improving the Housing Stock	7.2	Mr Alan Melhuish	Advocate	Housing para 7.2.2 having overcrowding largely concentrated in the east of the borough, elsewhere in this report the proposals support the majority of new development to be located in the same eastern areas. How can both be right ?
Protecting and Improving the Housing Stock	7.2	Ms Barbara Aldridge	Chairman Enfield Lock Conservation Group	It is difficult to understand (paragraph 7.2.1) how Enfield can have both a high level of vacant stock and a high level of homeless households.

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Managing the Supply of New Housing	7.3	Ms Anita Brookes		Your report states:"7.3.2 The new Plan will need to include the London Plan target of at least 3950 new dwellings in the borough by 2017, equivalent to 395 dwellings per annum. I disagree that new properties should be built. More should be done to stop 'Buy to Let' Landlords buying all the new builds and then hording them. Enfield has 3,000 empty homes, 2,600 owned by private landlords. We do not need more properties build. The council should be ensuring these landlords to sell them or rent them out. http://www.emptyhomes.com/resources/stats/lon06.htm http://www.emptyhomes.com/resources/stats/statistics.html
Managing the Supply of New Housing	7.3	Dr Chris Jephcott	President The Enfield Society	7.3.7 We query the observation in this paragraph that most of Enfield has relatively low levels of public transport accessibility. Some areas, yes, but most? Public transport, particularly bus, has improved considerably recently, as regards both frequency and access to new routes.
Managing the Supply of New Housing	7.3	Mr Alan Melhuish	Advocate	Para 7.3.4 Surplus industrial land. Housing should only be provided if a sustainable level of employment within the borough is provided to support that. Such initiatives have cross cutting interests particularly in transport and environmental pollution as well as those to promote inward investment.
Managing the Supply of New Housing	7.3	Mr Donald Alexander	Hon Secretary Chalk Lane Area Residents' Association	7.3.7: Housing density needs to take into account local traffic implications
Managing the Supply of New Housing	7.3	Mr Alexander		7.3.7: Housing density in different areas needs to take into account local traffic implications
Managing the Supply of New Housing	7.3	Ms Anna Chapman	Planner British Waterways-London Region	Re 7.3.4: BW recognises the need to retain Industrial / commercial land for employment use, particularly for warehousing and industrial uses and especially SME's. Due to the waterway heritage, industrial sites are typically adjacent to waterways. However BW feels that through the intensification of these sites, land immediately adjacent the waterways should be released for mixed use developments and uses that utilise their waterside location, unless they have the potential to utilise their waterside location for water transport. Developments adjacent to the waterways should integrate with, maximise the opportunities and not detract from their attractiveness. This advice is in accordance with the Urban Task Force report Towards a Strong Urban Renaissance, published in November 2005, which states local authorities" land use designation for areas in close proximity to sites of special amenity value (e.g. rivers, canals, parks, etc) should be reviewed to explore the potential to accommodate more appropriate and sustainable uses that respond to their urban potential. BW share the borough's desire to promote recreation and tourism along the waterways and recognise the contribution the change of use of non-residential sites could make to housing targets. The re-allocation of sites currently allocated for industrial uses could be redeveloped in a more sympathetic manner to animate and enhance the water environment, thus making it more attractive for recreation and tourism. BW would welcome early discussions with the Borough on the programme for the release of surplus industrial/ commercial land so that the potential for maximising the mutual benefits of waterside residential/ mixed use sites such as opportunities for environmental

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				improvements can be identified at the very earliest stage. BW is keen to work with the Borough, developer and other key stakeholders to produce Waterspace Strategies to facilitate these improvements.
Managing the Supply of New Housing	7.3	Mr Daniel Olliffe (Iceni Projects)	Principal Planner The Anderson Group	Paragraph 7.3.3 The principle for the location of new homes is supported. A recent site search exercise of the Borough which we have undertaken highlighted the lack of availability of large sites. Paragraph 7.3.4 In looking at release of surplus industrial/commercial land, we believe this option should be endorsed, especially for non Strategic Employment Location (SEL) land. We support the release of peripheral employment sites which are either no longer suitable for their existing uses or their existing uses create a land use conflict with nearby or adjoining residential land. Paragraph 7.3.7 In reference to the density of new housing, it is suggested that in areas close to rail and tube stations there is the potential for higher density provision on suitable sites. This principle of providing higher densities in appropriate locations is fully supported to meet a strategic need for housing growth. The policy approach needs to be flexible and allow for densities beyond the London Plan density matrix in certain areas because the table, by its very nature, is indicative only.
Managing the Supply of New Housing	7.3	Mr Alex Andrews	Principal Planner Transport for London	7.3 A strategic objective for the LDF should be to locate new housing development close to transport links and corridors, in particular within more built up urban areas. The relationship between housing density and provision of transport infrastructure should be clearly defined. 7.3.6 Support reference to the London Plan density matrix. The characteristics of the borough are varied but it is important to consider the density matrix in the London Plan as guidance on a site specific basis. This should reflect the level of car parking proposed alongside new housing provision. 7.3.7 TfL does not support reference in the LDF to the borough having low levels of Public Transport Accessibility Level (PTAL). Whilst this may be the case in large swathes of the borough there are numerous locations close to public transport links and within town centres that will have a medium to high PTAL rating, it is in these locations where housing density will be much higher.
Managing the Supply of New Housing	7.3	Ms Anita Brookes		Your report states:"7.3.2 The new Plan will need to include the London Plan target of at least 3950 new dwellings in the borough by 2017, equivalent to 395 dwellings per annum". I disagree that new properties should be built. More should be done to stop 'Buy to Let' Landlords buying all the new builds and then hoarding them. Enfield has 3,000 empty homes, 2,600 owned by private landlords. We do not need more properties build. The council should be ensuring these landlords to sell them or rent them out. http://www.emptyhomes.com/resources/stats/lon06.htm http://www.emptyhomes.com/resources/stats/statistics.html
Managing the Supply of New Housing	7.3	Meeting: ECEN 26.07.07		Concern was expressed about whether pressure will be put on Enfield to provide space for housing developers

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Providing Affordable Housing	7.4	Mr Steve Austin	Town Planner Network Rail	1. Any future affordable housing policy must allow for a level of flexibility in the application of affordable housing requirements depending on the circumstances of each case. The following observations should be treated as material considerations: Sites may require exceptional costs to be taken forward for housing, such as decontamination, access constraints, site assembly etc. This may reduce the level of Affordable Housing possible if a scheme is to remain viable. Not all developments will be eligible for Social Housing Grant; the amount of affordable housing that can be reasonably sought must take availability of grant into account. Â· If landowners are not confident that they can achieve a certain value for a brownfield site they may not develop at all in the hope that conditions change at a later stage, or may develop a non residential scheme instead. In both cases that sites potential to provide much needed housing (of any potential tenure) will be lost. 2. The policy must allow for the assessment of circumstances where it may be advantageous for a greater proportion of negotiated planning obligations to be used for other strategic objectives public benefit, rather than a rigid application of affordable housing ratios. The assessment of a reasonable provision of affordable housing for each site must be made in the context of identified need for that area, a consideration of viability, and the funding of other necessary facilities and infrastructure.
Providing Affordable Housing	7.4	Mr Daniel Olliffe (Iceni Projects)	Principal Planner The Anderson Group	Paragraph 7.4.4 It is our view that a greater proportion of affordable homes should be shared ownership properties for both key workers and first-time buyers. This will help to meet the Government's objectives set out in the introduction to PPS3. Cont.3â€ Paragraph 7.4.5 It is agreed that the affordable threshold will need to be viable and practical, but must be set at a level where development of appropriate forms of accommodation are encouraged and the development of smaller sites is not stifled through over prescriptive and unrealistic thresholds.
Providing Lifetime Homes and Housing to Meet Particular Needs	7.5	Ms Claire Martin	Policy Officer Lee Valley Regional Park Authority	7.5.4 Gypsy and Traveller sites A criterion should be added to those proposed for assessing gypsy and traveller sites that takes account of access for gypsies and travellers to schools, health facilities and shops.
	Question 15	Mr Tony Watts	ECEN Representative Over 50s Forum	Support option 1
	Question 15	Dr Chris Jephcott	President The Enfield Society	Option 2, but bear in mind need to increase stock of 4-bed homes.
	Question 15	Mr Alan Melhuish	Advocate	Para 7.6 Views protecting housing stock : the underlying problem is how a move away from older larger properties is changing an areas character making them into anonymous dormitory suburbs. Thought needs to be given to ways to retain affordable housing from amongst exiting housing stocks. Smaller properties that are regularly enlarged with loft extensions make those dwellings less affordable for those needing to move up the size chain of home later on. Some restraints should be put in place to maintain existing low cost homes supply , for if not done people will be forced into tenement type developments with their poorer access to shops and schools.

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	Question 15	Mr Andrew Newman	Forty Hill and Bulls Cross Study Group	Neither
	Question 15	Mr James Finn (Barton Willmore Planning)	Planner St James Developments Ltd	Our client objects to both of the above Options, and would instead support a flexible approach to the protection and/or replacement of housing stock. In some areas of the borough with existing high levels of affordable housing it may be beneficial to reduce the proportion of affordable housing in order to encourage more mixed and balanced communities.
	Question 15	Mr Glenn Stewart	Assistant Director of Public Health Enfield Primary Care Trust	The favoured option would be (2) to prevent the loss of all housing.
	Question 15	Mr Giles Dolphin	Planning Decisions Manager Greater London Authority	Policy 3A.4 of the London Plan requires the new plan to take account of the housing needs of different groups and ensure that new development offers a range of housing in response. Policy 3A.12 requires the new plan to prevent the loss of housing, including affordable housing, without its planned replacement at higher densities. The London Plan Supplementary Planning Guidance Housing provides further detail on the application of these policies. The new plan should seek to prevent the loss of all housing, including affordable housing unless it is replaced at existing or higher densities. Where there is an identified shortage of family housing and/or pressure on the existing stock through subdivision or redevelopment of larger family houses for smaller dwellings the new plan should take a balanced approach in response to defined local circumstances. In some instances trends such as a growth in homes in multiple occupation or the increased subdivision of larger homes may reflect equally well-founded housing needs. The London Plan Supplementary Planning Guidance Housing provides further detail on this matter.
	Question 15	Mr Daniel Olliffe (Iceni Projects)	Principal Planner The Anderson Group	From the site search exercise conducted for The Anderson Group, it is evident that there are few existing residential sites which would be large enough to provide suitable higher densities. The proposals to prevent the net loss of family sized accommodation are encouraged but this must be supported by a level of flexibility to allow the loss of family units in appropriate locations where higher density and more sustainable forms of development can be achieved.
	Question 15	Ms Jill McGregor (GL Hearn)	Tesco Stores Ltd	Option 2
	Question 16	Mr Tony Watts	ECEN Representative Over 50s Forum	I would support first three items in the list. I am not in favour of development at higher densities.
	Question 16	Mr Alan Melhuish	Advocate	Managing the supply 'no regard to the adverse impacts of increasing building height is being considered and the manner in which this affects the character of neighbourhood areas.

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	Question 16	Mr Peter O'Brien	Partnership Manager Learning Skills Council	We are not convinced by the arguments for releasing for housing land that is currently designated for industrial / commercial use. In particular, we are concerned about the consequences for the Borough if there were to be a significant reduction in capacity of Enfield as an area offering local jobs to people living here. The Borough's education and training system would then need to be more concerned with the supply of a skilled workforce that is employed elsewhere than on the needs of local businesses.
	Question 16	Dr Chris Jephcott	President The Enfield Society	There is scope for all four options. Upper floor residences can add vitality to town centres and use otherwise vacant space.
	Question 16	Mr Andrew Newman	Forty Hill and Bulls Cross Study Group	Look at mixed developments
	Question 16	UNKNOWN	Planning Manager National Grid Property Ltd	In order to appropriately manage the supply of new housing there may be a need to focus development in a number of locations. However, there are clearly key opportunities in the Upper Lee Valley Area for larger scale housing development and certain sites, such as those in the ownership of National Grid, have the potential to come forward for redevelopment relatively quickly. Placing the focus on sites in the Upper Lee Valley area accords with the requirements of the London Plan.
	Question 16	Katie Allison (GVA Grimley)	La Salle Investment Management	We would welcome a change in the balance of policies to give a greater incentive to promoting housing within the Upper Lea Valley Opportunity Area. The large raft of planning guidance and policy that is emerging identifies an overwhelming need for new homes and jobs. This is an area of significant change with London Plan targets of 7,000 homes to be built in this area by 2026. This will require the redevelopment of low density industrial / commercial sites such as Stonehill Business Park for mixed use residential led development at higher densities.
	Question 16	Dr Chris Jephcott	President The Enfield Society	There is scope for all 4 options. Upper floor residences can add vitality to town centres and use otherwise vacant space.
	Question 16	Mr James Finn (Barton Willmore Planning)	Planner St James Developments Ltd	In considering locations for new development, we would recommend that the new Plan focus on all of the options in order to ensure that Enfield will meet and exceed the housing targets set for the Borough as stated in the published Early Alterations in Policy 3A.2 Borough Housing Targets and Table 3A.1 Housing Provision.
	Question 16	Ms Barbara Aldridge	Chairman Enfield Lock Conservation Group	Where there is high density, new housing should be lower density, with local green spaces available.
	Question 16	Mr Patrick Blake	Network Strategy Highways Agency	The HA would prefer that new development is located in urban centres where it is more likely that a range of opportunities for sustainable travel will exist, or could be provided as part of the development proposal. Furthermore the HA would be supportive of the creation of a balanced strategy that takes the relative locations of both housing and employment into account to create a sustainable solution to meet the principles of PPG13. It is noted that 7000 homes are planned for the Upper Lee Valley opportunity area. An evaluation should be conducted as backup to the Core

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				Strategy to confirm that there is a realistic expectation that the impact of all development in this location can be mitigated.
	Question 16	Mr Glenn Stewart	Assistant Director of Public Health Enfield Primary Care Trust	The new Plan should focus development on redevelopment in town centres. This would tend to place people near to shops / amenities etc and so reduce the need for travel.
	Question 16	Mr Giles Dolphin	Planning Decisions Manager Greater London Authority	In general conformity with London Plan Policy 3A.7 the new plan should, in addition to those sources of housing land supply identified, also consider the change of use of surplus industrial/commercial land to residential or mixed use development, while protecting land supply for projected employment growth and require waste facilities.
	Question 16	Mr Daniel Olliffe (Iceni Projects)	Principal Planner The Anderson Group	In considering locations for new housing, arguably development should focus on strategic release of appropriate commercial sites where it can be demonstrated that there will be no adverse impact upon other forms of development. In accordance with policies set out in PPS3, change of use of commercial sites in residential areas would be particularly appropriate, as would the introduction of residential land use on employment sites, provided it can be demonstrated that a proposal will not affect the suitability of the site for employment-generating uses.
	Question 16	Mr Alex Andrews	Principal Planner Transport for London	A further objective should be added which aims to provide the majority of housing development close to public transport links and this should be based on assessments of capacity and demand.
	Question 16	Ms Jill McGregor (GL Hearn)	Tesco Stores Ltd	The Plan should consider all of the identified locations for new housing, however this should be prioritized as followed: 1. Redevelopment in town centres 2. Development at higher densities 3. Redevelopment of low density commercial sites for mixed use residential development 4. Development in upper Lee Valley Opportunity Area.
	Question 16	Amit Malhotra (RPS Planning)	Senior Planner Fairview New Homes Limited	Fairview would support an option which seeks to maximise housing densities in order to maximise and efficiently develop the use of land as well as to meet Government housing targets. Planning Policy Statement 3 on housing provides the context for achieving high quality and sustainable housing and the relevant types of housing required. Fairview are of the opinion that all residential development sites should conform with national guidance in that densities of 30 dwellings or more should be promoted. Paragraph 47 of PPS3 states that densities of 30 dwellings per hectare should be used as a national indicative minimum to guide policy development. Where specific figures are to be provided for specific sites, it should be made clear within the document that the figures are only an indicative figure and they are not a rigid minimum or maximum figure. The proposed figure needs to be flexible to take into account changes in the market and the sites characteristics.

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	Question 16	Gary Thomas (Planning Works Ltd)	Lionsgate Properties	The provision of new housing should be regarded as a key objective for the Plan and all locations should be regarded as appropriate in principle.
	Question 17	Mr Tony Watts	ECEN Representative Over 50s Forum	Developments should be mixed in size and types.
	Question 17	Dr Chris Jephcott	President The Enfield Society	Yes as a general rule, but not always feasible. Reiterate need for 3/4-bed homes.
	Question 17	Mr Alan Melhuish	Advocate	Yes. Concerns have been expressed at the small size of many new homes that have been built in recent times. Having cramped rooms in which to live is not conducive to sustainable living. Should some benchmarking of sustainable house areas be given if sedentary couch potato life styles are to be avoided ?
	Question 17	Mr Andrew Newman	Forty Hill and Bulls Cross Study Group	Yes
	Question 17	Mr James Finn (Barton Willmore Planning)	Planner St James Developments Ltd	The size and type of housing to be provided should be determined by the housing market. Accordingly, the new Plan should not require the provision of family homes on all sites. Indeed, it maybe wholly inappropriate on certain sites where there is high density apartment dwellings.
	Question 17	Mr Glenn Stewart	Assistant Director of Public Health Enfield Primary Care Trust	This rather begs the question of what a 'family home' is. Provision should be made for all 'families', even if this does not necessarily mean a four-bedroom house.
	Question 17	Mr Giles Dolphin	Planning Decisions Manager Greater London Authority	The new plan should ensure that development takes account of the housing needs of different groups in the area in line with Policy 3A.4 of the London Plan. The new plan should advocate a balanced approach and ensure that housing size and type in new development is tailored to local circumstances. The blanket provision of family housing on all sites is unlikely to be appropriate as many will not be suitable for family housing provision. The London Plan Supplementary Planning Guidance Housing provides further detail on the application of Policy 3A.4.
	Question 17	Mr Daniel Olliffe (Iceni Projects)	Principal Planner The Anderson Group	In the absence of a significant number of large developable sites within the Borough, it would be unrealistic to insist on the provision of family homes on all sites. Adoption of a rigid approach to family home provision does not provide the flexibility to encourage smaller sites to come forward and risks affecting the future provision of overall housing requirements. Furthermore, sites that are best suited to high density, flatted accommodation are not necessarily well suited to family accommodation. There is a need to ensure policies are as flexible as possible to prevent discouraging future development of available sites within the Borough.

Document Section	Section Number or Question	Name	Organisation	Response
	Question 17	Ms Jill McGregor (GL Hearn)	Tesco Stores Ltd	The provision of family housing should be considered on a site-by-site basis.
	Question 17	Amit Malhotra (RPS Planning)	Senior Planner Fairview New Homes Limited	Fairview object to the Council's proposal whereby a mix of housing types would be required in new residential development, and the Core Strategy should not require the provision of family homes on all sites. The Council should not be in a position to impose a level of restriction on housing development that goes well beyond normal responsibilities of planning and the intentions of the original Town & Country Planning Act. Fairview considers that the concept imposes an unjustified level of control on the house building industry. It is an unreasonable imposition for the following key reasons: i. It takes away the ability of the private sector to respond to market demands at any one given time. The need to be more responsive to market requirements was made clear in the Barker Review of Land Use Planning, Final Report Recommendations (2006). Box 1.1 of the report states that planners should take into account market signals that provide important information for planners in determining the most efficient use of land, and that these signals include information on vacancies; take up of newly built space; current construction rates; prime office rents; land values for different types of development; and trends in property choices. Subsequently, Recommendation 3 of the report emphasises the role that market signals, including price signals, can play in ensuring an efficient use of land, both in plan-making and in development management. ii. It takes away the ability of house builders to assess the viability of individual schemes and to establish the appropriate mix to make this viable. This completely undermines the application of the economics of supply and demand. This also hands complex decisions about development surveying and environmental analysis to LPAs who are not in the best position to make decisions. iii. It erodes the ability of the private sector to appropriately assess market demand in an area and to respond with innovation and initiative. iv. If sizes and types of housing are specifically defined in a policy in an LDD there is limited scope to react or respond quickly to changes in the market. Fairview would therefore strongly request that the approach is not adopted and that it is made clear that there will always be an appropriate level of flexibility for housebuilders to best determine the appropriate requirements of a site based on market and commercial considerations having regard also to general planning policies and environmental considerations.
	Question 17	Gary Thomas (Planning Works Ltd)	Lionsgate Properties	No. The individual circumstances of each site/proposal should be assessed to determine if the provision of family homes is appropriate.
	Question 18	Dr Chris Jephcott	President The Enfield Society	1. We think the proportion of affordable housing should be 50% over the agreed threshold, but that this should be nearer to the national average threshold than to the proposed new threshold for London. 2. We agree this approach.
	Question 18	Mr Andrew Newman	Forty Hill and Bulls Cross Study Group	-2

Document Section	Section Number or Question	Name	Organisation	Response
	Question 18		Planning Manager National Grid Property Ltd	If a borough wide minimum of 35% affordable housing provision on sites above a set threshold is to be sought it is imperative that the wording of the policy allows sufficient flexibility for viability and site specific considerations to be taken into account. Such an affordable housing policy should make it expressly clear that in applying the affordable housing requirements regard will be had to the particular costs associated with the development of the site (such as abnormal site preparation costs) and whether the provision of affordable housing would prejudice other planning objectives. Question 18 does not indicate what site threshold is envisaged, although reference is rightly made at paragraph 7.4.5 to the national indicative site threshold of 15 dwellings and to the Further Alterations to the London Plan which propose a new threshold for London of 10 or more homes. Whilst PPS3 does allow Local Planning Authorities to set lower minimum thresholds, this is only the case where such thresholds would be achievable and practicable. The PPS further advises (at Page 11, Paragraph 29) that: Planning Authorities will need to undertake an informed assessment of the economic viability of any thresholds and proportions of affordable housing proposed, including their likely impact upon overall levels of housing delivery and creating mixed communities. The London Plan, and the Proposed Further Alterations both confirm that targets for affordable housing should be applied flexibly, taking account of individual site costs. If the site size threshold is set too low and the affordable housing requirement set too high this has the potential, particularly on brownfield sites, to be neither viable nor practicable and can stifle development. This can further result in a detrimental impact upon overall levels of housing delivery (both in terms of market housing and affordable housing). If the LPA are considering setting a threshold lower than the indicative national level it will be essential that this is done only on the basis of a robust and informed viability assessment. Alternatively, as suggested in the consultation document issues such as economic viability and existing housing types and tenures can be taken account of on an area by area basis when defining the proportion of affordable housing to be sought. However, even in this form the affordable housing policy should still ensure that sufficient flexibility is allowed for to fully take into account site specific considerations. Similarly to the comments made above, in setting the threshold and percentage requirements this should only be done on the basis of a robust viability assessment to ensure that the levels set do not prejudice the overall level of housing delivery.
	Question 18	Dr Chris Jephcott	President The Enfield Society	1. We believe proportion of affordable housing should be 50% over agreed threshold but this should be nearer the national average than the proposed new threshold for London 2. We agree this approach.
	Question 18	Mr James Finn (Barton Willmore Planning)	Planner St James Developments Ltd	Our client supports Option 2. In some areas of the borough with existing high levels of affordable housing it may be beneficial to reduce the proportion of affordable housing in order to encourage more mixed and balanced communities. Taking into account economic viability and existing housing types and tenures on an area by area basis when defining the proportion of affordable housing to be sought, is the most practical and flexible of the options that would best feasibly allow the Council to deliver affordable Housing. Taking into consideration the economic viability of the provision of affordable housing will also provide the flexibility required for housing developers to progress schemes that are not financially able to provide 35% affordable housing, but that nonetheless would constitute a valuable source of housing for the Borough.

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	Question 18	Ms Barbara Aldridge	Chairman Enfield Lock Conservation Group	There is a need for more genuinely affordable housing in the borough, this should be spread throughout the borough.
	Question 18	Mr Glenn Stewart	Assistant Director of Public Health Enfield Primary Care Trust	The preferred option is to seek a borough wide minimum of 35% of new dwellings to be affordable as a standard provision on all sites.
	Question 18	Mr Giles Dolphin	Planning Decisions Manager Greater London Authority	London Plan policy 3A.7 and Supplementary Planning Guidance on Housing unequivocally require that the new plan sets an overall target for the amount of affordable housing provision in the area over the plan period. This target should take account of regional and local assessments of need, the Mayor's strategic target for affordable housing provision that 50 per cent of provision should be affordable and, within that, the Londonwide objective of 70 per cent social housing and 30 per cent intermediate provision, and the promotion of mixed and balanced communities. Further Policy 3A.8 requires Boroughs to seek the maximum reasonable amount of affordable housing when negotiating on individual private residential and mixed-use schemes, having regard to their affordable housing targets adopted in line with policy 3A.7, the need to encourage rather than restrain residential development and the individual circumstances of the site. It also states that affordable housing targets should be applied flexibly, taking account of individual site costs, the availability of public subsidy and other scheme requirements. An overall borough-wide affordable housing target of below 50% requires justification that, not only is the target adequate to meet the affordable housing needs arising within the borough, but also that there is no case for the borough to make a contribution to meeting wider sub-regional and regional needs. No such justification has been given for the proposed Borough-wide maximum of 35% of new dwellings. Para 7.4.6 of the Core Strategy Issues and Options Report states that a GLA commissioned study undertaken by The Three Dragons consultancy and Nottingham Trent University (2001) concluded that: on development sites for private and mixed use schemes in Enfield it was viable to provide 35% affordable housing. This study has been wholly superseded by the GLA housing requirements study published in 2004 and the adoption of the London Plan and should be disregarded for the purposes of determining affordable housing provision in the new plan. The new plan should be in general conformity with the requirements of London Plan policies 3A.8 and 3A.9 and the London Plan Supplementary Planning Guidance Housing as outlined above.
	Question 18	Mr Daniel Olliffe (Iceni Projects)	Principal Planner The Anderson Group	Option 2 is supported as a flexible approach to affordable housing provision. Providing a degree of flexibility in the scheme will yield positive results in encouraging smaller sites to come forward for development. There should be provision for a threshold to ensure larger sites deliver an agreed level of affordable housing but this should not compromise the ability for smaller sites to provide other beneficial forms of development for example larger family units. A prescriptive threshold may stifle development on smaller sites by restricting unit numbers below this limit or alternatively by creating applications for developments of grossly inflated densities to offset the affordable requirements, which will not deliver the needs of the Borough in an appropriate way.

Document Section	Section Number or Question	Name	Organisation	Response
	Question 18	Mr Alexander		Agreed - should set a minimum of at least 35% of affordable houses Agreed - the percentage of affordable housing should be different in different areas
	Question 18	Ms Jill McGregor (GL Hearn)	Tesco Stores Ltd	Option 1
	Question 18	Amit Malhotra (RPS Planning)	Senior Planner Fairview New Homes Limited	Fairview object to the Council's proposal to specify a quantum of 35% affordable housing required for residential development. This could have a detrimental effect on the viability of development and may prohibit, if applied inflexibly without having the regard to the merits of each case, housing development in the area. Fairview, therefore, request that due consideration is given in the policy to the need to have regard to the specific circumstances of each site including economic viability, when negotiating the provision and type of affordable housing. Planning Policy Statement 3 (PPS3) on housing provides the national context for achieving high quality and sustainable housing and the relevant types of housing required. PPS3 stipulates that planning authorities will need to undertake an informed assessment of the economic viability of any thresholds and proportions of affordable housing proposed, including their likely impact upon overall levels of housing delivery and creating mixed communities. The policy should therefore, as suggested in point 2 of the question, make it clear that each case will be treated on its merits, having regard to such criteria as well as the Council's objective for providing affordable housing based on an up-to-date Strategic Housing Market Assessment.
	Question 18	Gary Thomas (Planning Works Ltd)	Lionsgate Properties	The application of a standard percentage for affordable housing provision over a particular threshold is a crude policy approach. Provision of affordable housing has been an accepted approach for a significant length of time and the policy used to determine provision needs to be able to reflect a whole range of local and site circumstances.
	Question 19	Mr Tony Watts	ECEN Representative Over 50s Forum	Support option 1
	Question 19	Mr Andrew Newman	Forty Hill and Bulls Cross Study Group	-2
	Question 19	Mr Tony Watts	ECEN Representative Over 50s Forum	Support option 1
	Question 19	Mr James Finn (Barton Willmore Planning)	Planner St James Developments Ltd	Our client would support Option 2 as it would provide the most flexible and practicable solution that would best meet an area's requirement for either intermediate or social rented housing.

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	Question 19	Ms Barbara Aldridge	Chairman Enfield Lock Conservation Group	There is a need for more genuinely affordable housing in the borough, this should be spread throughout the borough.
	Question 19	Mr Glenn Stewart	Assistant Director of Public Health Enfield Primary Care Trust	Preferred option is to set a borough wide standard ratio for the balance of intermediate to social rented housing in all affordable housing schemes.
	Question 19	Mr Giles Dolphin	Planning Decisions Manager Greater London Authority	London Plan policy 3A.7 and Supplementary Planning Guidance Housing require that the new plan sets a target for social housing and intermediate provision taking account of the London-wide objective of 70 per cent social housing and 30 per cent intermediate provision and the relative needs for social housing and intermediate provision in the Borough and wider sub-region. In negotiating provision on individual schemes it may be appropriate to vary these proportions in response to local circumstances but the target ratio above should always be the starting point for and key reference throughout such negotiations.
	Question 19	Ms Jill McGregor (GL Hearn)	Tesco Stores Ltd	Option 1
	Question 19	Amit Malhotra (RPS Planning)	Senior Planner Fairview New Homes Limited	Fairview supports the Council's proposal to vary the proportions of each type of affordable housing in different parts of the Borough according to local circumstances and the Mayor's overall assessment. Paragraph 29 of PPS3 stipulates LPAs should set separate targets for social-rented and intermediate affordable housing where appropriate and recognises that: A sufficient supply of intermediate affordable housing can help address the needs of key workers and those seeking to gain a first step on the housing ladder, reduce the call on social-rented housing, free up existing social-rented homes, provide wider choice for households and ensure that sites have a mix of tenures.
	Question 19	Gary Thomas (Planning Works Ltd)	Lionsgate Properties	2 preferred.
	Question 20	Mr Tony Watts	ECEN Representative Over 50s Forum	Support option 1
	Question 20	Dr Chris Jephcott	President The Enfield Society	An interesting concept. We support 1.
	Question 20	Mr Andrew Newman	Forty Hill and Bulls Cross Study Group	Neither

Document Section	Section Number or Question	Name	Organisation	Response
	Question 20	Mr Tony Watts	ECEN Representative Over 50s Forum	Support option 1
	Question 20	Mr James Finn (Barton Willmore Planning)	Planner St James Developments Ltd	Our client would support Option 1 as it keeps the requirements of planning and those of building regulations separate.
	Question 20	Mr Giles Dolphin	Planning Decisions Manager Greater London Authority	The new plan should seek full adherence to the Lifetimes Homes Standard as required by London Plan policy 3A.4. This policy also requires that 10 per cent of new housing is wheelchair accessible or easily adaptable for residents who are wheelchair users
	Question 20	Ms Jill McGregor (GL Hearn)	Tesco Stores Ltd	Option 2
	Question 21	Mr Tony Watts	ECEN Representative Over 50s Forum	Need for collection disposal of refuse & rubbish
	Question 21	Dr Chris Jephcott	President The Enfield Society	We agree these criteria.
	Question 21	Mr Peter O'Brien	Partnership Manager Learning Skills Council	The demand for new schools and education / skills provision implies the need for a greater number of designated 'key worker' units.
	Question 21	Mr Andrew Newman	Forty Hill and Bulls Cross Study Group	security and schooling
	Question 21	Mr Giles Dolphin	Planning Decisions Manager Greater London Authority	This is supported by London Plan Policy 3A.11.

Document Section	Section Number or Question	Name	Organisation	Response
	Question 22	Mr Tony Watts	ECEN Representative Over 50s Forum	While providing needed accommodation there are many downsides. Much of this accommodation is rented to those who are transitory and neither they or the owners have regard to ownership responsibilities. Many examples of this are seen throughout Enfield. Rubbish and litter often accumulate around the properties with poor exterior maintenance. Furthermore community spirit and cohesion suffer with scant regard for neighbours. This is a particular problem where buy to rent occurs and the properties are let to other authorities to provide housing for those in need of social housing from their borough. This same issue also often applies to private rented properties.
	Question 22	Dr Chris Jephcott	President The Enfield Society	Given the demographic mix, should not resist subdivision into smaller, viable units, but we do not believe HMOs are a viable solution and think should be resisted overall.
	Question 22	Mr Andrew Newman	Forty Hill and Bulls Cross Study Group	Yes. Sub-division often has a degrading impact to the building and the locality, especially if it is older housing stock. Designs often compromise the aesthetics of the building and have inadequate provision for parking, refuse and access.
	Question 22	Mr Giles Dolphin	Planning Decisions Manager Greater London Authority	Policy 3A.4 of the London Plan requires the new plan to take account of the housing needs of different groups and ensure that new development offers a range of housing in response. Policy 3A.12 requires the new plan to prevent the loss of housing, including affordable housing, without its planned replacement at higher densities. The London Plan Supplementary Planning Guidance Housing provides further detail on the application of these policies. The new plan should seek to prevent the loss of all housing, including affordable housing unless it is replaced at existing or higher densities. Where there is an identified shortage of family housing and/or pressure on the existing stock through subdivision or redevelopment of larger family houses for smaller dwellings the new plan should take a balanced approach in response to defined local circumstances. In some instances trends such as a growth in homes in multiple occupation or the increased subdivision of larger homes may reflect equally well-founded housing needs. The London Plan Supplementary Planning Guidance Housing provides further detail on this matter.
Social Infrastructure	8	Rose Freeman	Planning Assistant The Theatres Trust	It is important that the need for developer contributions for the infrastructure of community and cultural activities is identified within its own section and you may want to broaden this out in the form of a supplementary planning document which should develop detailed policies setting out what achievements are expected from section 106 agreements and address cultural provision. In investing time and resources in such a document will set down clearly what is required of the developer and other funding partners.
Social Infrastructure	8	Mr Alan Melhuish	Advocate	Social Infrastructure should include cultural provisions

Document Section	Section Number or Question	Name	Organisation	Response
Social Infrastructure	8	Ms Georgie Cook	Town Planning Administrator Thames Water Property Services	Utilities infrastructure Paragraph B6 of PPS12 states that in preparing Local Development Documents, authorities should consider both the requirements of the utilities for land to enable them to meet the demands that will be placed upon them and the environmental effects of such additional uses. As stated above, this is particularly relevant for Thames Water where our sites may require future development and expansion to meet environmental, social and economic change, standards specifically those posed b population and economic growth, tighter environmental standards and from the impacts of climate change.. In terms of water supply, demand side measures alone will not be sufficient to meet the future demand for water. Provision will be required for additional water resources if Thames Water is to maintain acceptable supplies to its customers, particularly in dry years. Hence, a further new policy should be included in the LDF Core Strategy as follows: Proposed new policy:- Utilities Development: The development or expansion of water supply or waste water facilities will normally be permitted, either where needed to serve existing or proposed development in accordance with the provisions of the Development Plan, or in the interests of long term water supply and waste water management, provided that the need for such facilities outweighs any adverse land use or environmental impact that any such adverse impact is minimised. It is considered that the above policy and supporting text accords with the guidance referred to above in PPS12 and the London Plan.
Social Infrastructure	8	Mr Matthew Roe (CgMs)	Senior Associate Director Metropolitan Police Authority	The MPA believe it is reasonable to seek contributions towards policing needs where these directly arise as a result of significant development proposals.
Social Infrastructure	8	Chief Inspector Stuart Palmer	Police Partnerships Metropolitan Police	You may wish to add a section on Anti-Social Behaviour in either Housing or Social Infrastructure to reflect the new standards of behaviour policy and the huge investment that the LBE have placed in the Community Safety Unit as well as police commitment in this area including Safer Neighbourhood Teams.
Social Infrastructure	8.2	Mr Larry Dinnall		You have stated within the Enfield Plan under Community Services item 8.2.1 "The 2001 census shows that Enfield is extremely diverse with a wide variety of cultures and faiths represented. The new Plan will seek to ensure that appropriate facilities are provided within easy reach by walking and public transport of the population that use them". How are you going to achieve this fairly? Currently there are many Christian Faith Group (Churches) especially minority groups trying to obtain premises within the Borough with no joy, however the Council have been disposing of these premises. By what means will you engage with the minority community at large? The loss of such premises have not previously been resisted, however decreased provision made available. How will you address the population increase to meet the existing deficiencies?

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Social Infrastructure	8.2	Rose Freeman	Planning Assistant The Theatres Trust	The list at 8.2.1. On page 35 gives examples of community facilities but does not include cultural facilities. We assume that cultural facilities may be included with leisure facilities as your Cultural Strategy on page 4 states that the term leisure and culture includes libraries, theatres, open spaces etc. For the sake of clarity we suggest that your Glossary includes an explanation of the various terms used especially the difference between community and cultural facilities where facilities for the community usually refers to doctors surgeries, post offices, schools etc. while cultural facilities should include theatres, museums, libraries, art galleries etc. Leisure facilities is another term that would be interpreted as referring to bowling alleys, cinema, bingo, sports and playing fields. Even if you don't agree with our understanding of these terms it is important that your interpretation is understood in the context of your policies.
Social Infrastructure	8.2	Mr Matthew Roe (CgMs)	Senior Associate Director Metropolitan Police Authority	Whilst the MPA welcome the inclusion of police stations within the example community facilities set out in paragraph 8.2.1 the MPA would wish to see this extended to police facilities. As indicated above the facilities requirements of the MPA are changing from traditional police stations and using the term police stations is therefore no longer relevant. The suggested police facilities wording would encompass the wider range of facilities within the police estate, especially the provision of police shops and office accommodation for safer neighbourhood teams. The MPA recommend use of the term Police Facilities rather than Police Stations with regard to social infrastructure and planning contributions.
Social Infrastructure	8.2	Mr Raymond Deakin	Minister Jehovah's Witness	Summary: There is no mention of allocating or considering providing land for places of worship e.g. for Jehovah's Witnesses. Please could you inform me as to whether this is your Council's policy or if not, why no provision is made for places of worship.
Social Infrastructure	8.2	Mr Raymond Deakin	Minister Jehovah's Witness	Summary: As a follow up to Mr Deakin's earlier letter regarding sites for places of worship, he requests that: 1) The Council resist any application for a change of use from D1, particularly D1(h), to any other use, or from D1(h) to any other D1 use 2) Are there specific areas where a change of use to D1 (h) use might be considered? 3) What plans do the Council have for reserving sites for D1 (h) use in new development areas?
Social Infrastructure	8.2	Ms Anna Chapman	Planner British Waterways- London Region	BW recognises that there must be specific provision for community needs in development frameworks, including access to green space and active travel to promote physical activity. In respect of the last points, it is considered that the towpaths have significant potential for achieving better access to green space and active travel (walking, jogging and cycling). BW's role in facilitating and providing community facilities should be acknowledged in the LDF. BW has an education role in the community. BW employs a Learning Services Manager to work with local schools and the community to assist in the awareness and promotion of the historical, environmental, social, sustainable and economic role of the inland waterways within modern life. BW promotes the use of Beauchamp, a floating classroom. Beauchamp is able to navigate the canals and provide school children with a fascinating insight into the waterways. It can also provide an imaginative and creative environment for learning and achieving. Beauchamp mainly navigates around West London. However the Council may consider seeking financial contributions through section 106 money to fund another floating classroom/ community facility to serve LB Enfield and the rest of East London's canal network. Given its mobile nature and the significant location and length of the River Lee Navigation through Enfield it would provide an education facility that can be accessible to a wide

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				geographical area. A floating classroom could also be used as a community facility.
Social Infrastructure	8.2	Mr Glenn Stewart	Assistant Director of Public Health Enfield Primary Care Trust	Re 8.2.2: The line the new plan will seek to ensure that appropriate facilities are provided within easy reach by walking and public transport of the public that use them is welcomed but should also include cycling given the greater freedom it allows. This would therefore include make cycling easier, safer and more convenient within the borough.
Improving Areas of Deprivation	8.3	Mr Alex Andrews	Principal Planner Transport for London	Social infrastructure in the borough should be accessible by public transport including walking and cycling. For example hospitals and community facilities should be served by local bus routes with sufficient capacity.
Health	8.4	Mr Alex Andrews	Principal Planner Transport for London	TfL recognises that deprived areas can be assisted by better quality and more frequent public transport services.
Your Views	8.6	Chief Inspector Stuart Palmer	Police Partnerships Metropolitan Police	Crime and ASB should have its own section to reflect community priorities and it is key to social infrastructure.
	Question 23	Mr Tony Watts	ECEN Representative Over 50s Forum	Support
	Question 23	Dr Chris Jephcott	President The Enfield Society	Very important to do this.
	Question 23	Mr Alan Melhuish	Advocate	Para 8.6 Views : Social Infrastructure yes but subject to minimising car usage and improved transport links.
	Question 23	Mr Peter O'Brien	Partnership Manager Learning Skills Council	Yes. We would also recommend that the use of facilities for outreach education / skills or advice & guidance centres should be considered

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	Question 23	Mr Andrew Newman	Forty Hill and Bulls Cross Study Group	Yes but not necessary for commercial events.
	Question 23	Mr Glenn Stewart	Assistant Director of Public Health Enfield Primary Care Trust	Yes, community buildings should be encouraged. Not only for the reasons given but because the placement of services in one building encourages cooperation between those services.
	Question 23	Mr Giles Dolphin	Planning Decisions Manager Greater London Authority	The multiple use of community buildings, where uses are compatible, should be encouraged in the new plan in order to make the best use of land and minimise the need to travel.
	Question 23	Amit Malhotra (RPS Planning)	Senior Planner Fairview New Homes Limited	Fairview would support the multiple use of community buildings and where possible the consolidation Education Facilities, as identified within the Town Centre AAP. This would release sites that could be beneficial for the LPA and assist with regeneration of underused town centre land.
	Question 24	Dr Chris Jephcott	President The Enfield Society	All developments other than small ones. Probably 10% of the whole.
	Question 24	Mr Alan Melhuish	Advocate	Improving areas of deprivation cultural provisions activities which are life enhancing and character forming. Sustainable economies that generate the levels of income that people are willing to spend on cultural outlets are important. In promoting sustainable communities one needs greater focus of generating work and employment mixes that encourage people to stay in the area , such as at Lancaster Road that give a locality a sense of identity.
	Question 24	Mr Peter O'Brien	Partnership Manager Learning Skills Council	Whilst it is correct to maximise the social and economic benefit of development in these designated areas, we feel that the Plan should more clearly articulate the extent to which these areas will be prioritised for public investment. Deprivation is particularly acute in these areas and shows all the signs of becoming very deep-rooted. Without urgent action, the wider social ambitions of the Plan are at risk of breaking down in these areas. Increasing deprivation in the north-east and south-west of the Borough are also of significant concern and prompt action is necessary to arrest decline there before deprivation reaches the levels and extent of the south-east of the Borough. These factors should be at the heart of social and economic impact assessments that ought to be features of all significant development within the Borough.
	Question 24	Mr Andrew Newman	Forty Hill and Bulls Cross Study Group	Any major development (residential, commercial)
	Question 24	Mr Glenn Stewart	Assistant Director of Public Health Enfield Primary Care Trust	Types of development that should be subject to social and economic impact assessments are transport and housing.

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	Question 24	Mr Giles Dolphin	Planning Decisions Manager Greater London Authority	London Plan policy 3A.25 requires that all major developments in, or with the potential to impact on, Areas for Regeneration should be subject to social and economic impact assessments. These should consider the direct and indirect effects of a development on Areas for Regeneration, and be prepared by developers, in close collaboration with local community organisations and other local partners. Arrangements for fast-tracking such assessments should be put in place. Local neighbourhood needs, identified by local community organisations and other local partners, should be used as a basis for negotiating local community benefit from development, including Section 106 agreements.
	Question 25	Mr Tony Watts	ECEN Representative Over 50s Forum	Support but provision could be rationalised to be more cost effective with improved buildings and facilities. NHS Dental services are inadequate.
	Question 25	Mr Alan Melhuish	Advocate	Health provision is patchy and some service provisions are increasingly offering cut down or restrictive services which owes more to labour concerns that community provision. Any positive action to redress this should be followed.
	Question 25	Mr Norman Smith	Coombehurst Close Residents Association	Better health facilities are required. Hospital facilities should be expanded and modernised.
	Question 25	Mr Andrew Newman	Forty Hill and Bulls Cross Study Group	Yes, but more emphasis on preventative measures should be made such as parks and open spaces.
	Question 25	Mr Donald Alexander	Hon Secretary Chalk Lane Area Residents' Association	Do not consider that the provision of health facilities in the Borough is adequate. Council must monitor the increased demand on Community Care if services at Chase Farm are reduced.
	Question 25	Mr Glenn Stewart	Assistant Director of Public Health Enfield Primary Care Trust	Yes.
	Question 25	Mr Alexander		I do not consider that the provision of health facilities in the Borough is adequate The Council should not need to secure funding for additional health facilities through Section 106 terms, but should do so if all else fails Council must monitor the increased demand on Community Care if services at Chase Farm are reduced Middlesex University should be pushed to improve their stewardship of their Trent Park site in general and to improve their buildings without expanding them
	Question 26	Mr Andrew Newman	Forty Hill and Bulls Cross Study Group	As per 24. Should look at provision of local open space and health facilities nearby. [Answer to Question 24: "Any major development (residential, commercial)"]

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	Question 26	Mr James Finn (Barton Willmore Planning)	Planner St James Developments Ltd	Our client would suggest that development proposals should be individually assessed as to their need to provide a Health Impact Assessment, based on the impacts that the proposal would have on an area. Accordingly, there should be no prescriptive measures in the new plan outlining what scale and type of development would require a Health Impact Assessment.
	Question 26	Mr Glenn Stewart	Assistant Director of Public Health Enfield Primary Care Trust	Whilst HIAs are undoubtedly important this question may perhaps be better answered by a working group between the LA and the PCT being set up to draw up some guidelines.
	Question 26	Mr Giles Dolphin	Planning Decisions Manager Greater London Authority	Policy 3A.20 requires that Boroughs have regard to the health impacts of proposals for major new developments in order to promote public health within the Borough.
	Question 26	Ms Julia Sherfield	Corporate Policy Officer Enfield Council	Health Impact Assessments can be applied to all types of developments and ideally should be prospective to ensure recommendations can be acted upon. Health Impact Assessments should be applied to the high strategic plans for the borough to ensure they address health needs and do not worsen inequalities. This should help ensure that subsequent developments following an initial assessment are not detrimental to the borough's health. The Health Improvement Partnership is exploring options for obtaining external support to help deliver assessments in relation to the major plans and developments put forward through the place shaping agenda.
	Question 27	Mr Tony Watts	ECEN Representative Over 50s Forum	As a society we should spend more on health and fitness maintenance as this would reduce the demand and costs on our critical health services and on social care.
	Question 27	Dr Chris Jephcott	President The Enfield Society	Seems logical as part of Section 106 agreements.
	Question 27	Mr Andrew Newman	Forty Hill and Bulls Cross Study Group	After HIA completed. Should provide for cumulative effects of small developments.
	Question 27	Mr Glenn Stewart	Assistant Director of Public Health Enfield Primary Care Trust	Securing funding for additional health facilities yes. Particularly as proposed work will often impact on the health status of the surrounding population which will then impact upon health services.

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	Question 27	Mr Giles Dolphin	Planning Decisions Manager Greater London Authority	Policy 6A.5 of the London Plan requires the new plan to set a clear framework for negotiations on planning obligations having regard to central government policy, local and strategic considerations. Furthermore Policy 6A.4 of the London Plan requires Boroughs to reflect the policies of the London Plan in determining priorities in planning obligations and outlines the Mayor's wish to develop with Boroughs a voluntary system of pooling for the provision of facilities related to proposed developments. The Council should explore, within the context of these policies, all appropriate mechanisms for securing funding or other contributions through planning negotiations towards health and other community facilities.
	Question 28	Mr Tony Watts	ECEN Representative Over 50s Forum	The plan should be open and supportive encouraging development of higher and further education in the Borough. Better educated residents improve life for all.
	Question 28	Mr Alan Melhuish	Advocate	Education Extensions and expansion should reflect the open nature of settings . Mitigate the expansion of hard landscaping by making buildings and surface more rustic in appearance, which would be eco friendly.
	Question 28	Mr Peter O'Brien	Partnership Manager Learning Skills Council	We do not believe that the Plan pays sufficient attention to the role of education in improving wealth, health, community cohesion and social mobility. There has been significant progress in recent years at all levels of education: primary, 11-14, 14-16, 16-19 and continuing adult education. In particular, we are disappointed that the Plan has not commented on either the work to date or the future plans for 14-19 provision on which the Council and the LSC have worked together in partnership. Nor is there any mention of the substantial capital development plans that are proposed for the estate managed by the Colleges of Further education within the Borough, proposals to align these plans with the strategy for school buildings sponsored by the Council through the Better Schools for the Future initiative, or coverage of proposals to improve the distribution of learning opportunities across the Borough, for example through implementing Specialised Diplomas by 2013. The LSC is also sponsoring the Council to undertake a major study into learning, skills and employment needs for the Borough that we feel should also feature more prominently in the Authority's plans for the future.
	Question 28	Dr Chris Jephcott	President The Enfield Society	These needs should be balanced against those of the Green Belt, which we consider paramount.
	Question 28	Dr Frederic Clark	Hon. Secretary Trent Park Conservation Areas Advisory Committee	[Question 28] Middlesex University should be pushed to improve the stewardship of their Trent Park site and to improve their buildings, but not permitted to expand them.
	Question 28	Mr Andrew Newman	Forty Hill and Bulls Cross Study Group	Should be subject to (8) above. A plan should be made and agreed with all stakeholders and local groups. They should also be rated both as custodians of the sites and the sites suitability for its use. [Consultee's response to question 8: The plan should state that the intention is to stabilise the major developed sites in the Green Belt and a coherent, agreed plan should be put in place for the management of the sites with a view to Conservation (history and environment) and enhancement of those areas. Future development should be subject to such a plan being in place.]

Document Section	Section Number or Question	Name	Organisation	Response
	Question 28	Dr Chris Jephcott	President The Enfield Society	These needs should be balanced against those of the Green Belt we consider paramount.
	Question 28	Mr Giles Dolphin	Planning Decisions Manager Greater London Authority	The new plan should adopt a criteria based approach to the provision of different types of educational facilities and the expansion of existing facilities in line with Policy 3A.21 of the London Plan. This should take into account: the need for new facilities. the potential for expansion of existing provision the possibility of inter-borough provision safe and convenient access by pedestrians, cyclists and by public transport users Â· the other policies in the London Plan, including safety, sustainable design and construction, inclusive design, enhancement of the public realm and the protection of the Green Belt, Metropolitan Open Land and other open spaces in London.
Employment	9	Ms Claire Martin	Policy Officer Lee Valley Regional Park Authority	Protecting Employment Land and Improving quality (Section 9 and Question 30). The Park Authority wishes to see the environment of Enfield's employment areas improved where they are within the Lee Valley and border the Regional Park. Improving the quality of the environment within these sites through better design, increase in open space, habitat creation etc and establishing better links both physical and visual to the Regional Park and its waterside open spaces will support regeneration by helping to deliver an attractive business location and improved access to the Regional Park. Consideration of the transfer of industrial land to other uses should look at open space or leisure use especially where this could complement sites and facilities within the Regional Park.
Employment	9	Ms Anna Chapman	Planner British Waterways-London Region	Please see BW's comments under 7.3.4 Business barges can help support small and medium-sized employment space in appropriate locations along the River Lee Navigation at the same time as adding interest and animation to the waterspace. BW welcomes the opportunity to discuss appropriate locations for business barges.
Employment	9	Mr Daniel Olliffe (Iceni Projects)	Principal Planner The Anderson Group	It is acknowledged that employment will continue to play a significant role in the future growth of the Borough with an increased emphasis on logistics and warehousing activities. Following a review of the existing industrial locations within the Borough, it is evident that the Strategic Employment Locations play a crucial role in the economic prosperity of Enfield supporting some large multinational employers including Coca Cola and Warburtons. Given the significance of some of these areas, it is agreed that they should be maintained for the benefit of the future vitality and viability of the Borough. In respect of more peripheral employment locations, which do not experience the same spatial relationship to major infrastructure links as Strategic Employment Locations, it is suggested that sites should be considered for alternative uses where it can be demonstrated that there is little demand for these uses in accordance with an exceptions test for the release of such land. In reference to the high levels of vacant stock in some employment locations, the Core Strategy should enable diversity of uses but with a caveat that any redevelopment must not jeopardise or weaken a site's employment generating potential.

Document Section	Section Number or Question	Name	Organisation	Response
Employment	9	Mr Daniel Olliffe (Iceni Projects)	Principal Planner The Anderson Group	The prominent location of the principal Strategic Employment Locations to the east of the Borough creates a strong corridor of employment uses which should be maintained and protected to ensure continued growth of the Borough. There should however be a degree of flexibility applied to the development of these areas to ensure future employment needs are met, most appropriately through the support for warehousing and logistics operations and the growth of new premises for SMEs. Whilst the adoption of a classification system of other employment locations is supported, there should be a degree of inherent flexibility which allows these areas to change in view of market activities and/or where considered appropriate. In such circumstances, mixed use and residential uses, together with employment generating uses that protect, sustain or enhance the economy should be given favourable consideration in policy terms.
Employment	9	Dwyer Asset Management plc	c/o Agent for Dwyer Asset Management plc	<p>We are instructed by our client Dwyer Asset Management plc, asset manager for the clients that own the BOC site, to submit the following representations in relation to the Core Strategy Issues and Options Report.</p> <p>a) Employment (Chapter 9)</p> <p>Paragraph 9.5 puts forward seven questions with regard to the employment issues. We firstly set out our response to these questions and then provide a General Statement with regard to employment development in the Borough in relation to the questions.</p> <p>i) Question 29 We consider that mixed-use and more intensive development should be promoted as a general Borough-wide policy on employment land and thus support Option 1.</p> <p>ii) Question 30 The first part of Question 30 is not a question but a statement, namely: - The new Plan will set out the detailed boundaries of the Borough's Strategic Employment Locations. This is a requirement in the original London Plan (2004) and the latest alterations (2007).</p> <p>iii) Question 31 The Plan should not define and protect the best employment sites outside the Strategic Employment Locations as this is unnecessary in the light of the amount of vacant employment land and could result in sites being sterilised that could be used for other essential development.</p> <p>iv) Question 32 No comment.</p> <p>v) Question 33 No comment.</p> <p>vi) Question 34 No comment.</p> <p>vii) Question 35 The new Plan can help develop the skills and employment opportunities of local people by applying a broader definition of employment and not restricting it to B1, B2 and B8 uses</p>

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				<p>which are generally in decline.</p> <p>b) General Statement</p> <p>i) The approach in the Plan to Industrial Capacity.</p> <p>The policies and proposals with regard to this matter in the Issues and Options Report have evolved principally as a result of the Enfield Employment Land Study-Final Report carried out by Halcrow's on behalf of the council in December 2006. We consider that the approach taken is now out of date and that a more holistic approach is requires that needs to include regeneration considerations. This matter is dealt with below.</p> <p>The Employment Chapter (9) of the Issues and Options Consultation Report seeks to balance the demand and supply of land for employment uses over the Plan Period in accordance with the findings of the Halcrow Report. It also refers to the Mayor's guidance on industrial capacity in the draft Supplementary Planning Guidance produced by the GLA in 2003 and on the report prepared by Roger Tym and Partners for the GLA in 2005.</p> <p>The Halcrow Report took the conventional step-by-step approach to determine the demand and supply of employment land. It firstly surveyed the amount of available land in the Borough. It then assumed that 10% vacancy should be maintained which is the national average, to allow for the effect of the operation on the market. On this basis there is a surplus of 32 hectares of land in the London Borough of Enfield.</p> <p>The next step is to seek to assess the structural demand for additional employment land within the Plan period which is up to 2016. This is done by contacting employers to ask them what their aspirations are for the future and then applying a range of density figures in order to arrive at a range of employment land requirements for the Plan period. Their estimate is between 11-15 hectares (2001-2016) or 26-31 hectares (2005-2016). This would thus leave a total surplus of employment land requirement that could be released between 2005 and 2016 of only 1 to 6 hectares.</p> <p>The trends shown in the Halcrow report are very different from those being shown in the latest employment land reports. The study carried out by Roger Tym and Partners for the GLA (2004) found that 100 hectares (net) of industrial land could be released to other uses in North London from 2001-2016 (Paragraph 22.2 of the Executive Summary). The latest report produced by the URS Corporation Ltd for the GLA (April 2007) advises the release for North London of 207 hectares between 2001 and 2016; and 103 hectares between 2006 and 2016. This is a substantial increase on the Roger Tym Report. Thus the trend predicted by the latest URS Report is entirely different to that predicted by the Halcrow Report and envisages a considerably greater release of land in the</p>

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				<p>area. The main point, with regard to these figures is how sensitive they are to different minor inputs.</p> <p>The high sensitivity of these figures is recognised in the Halcrow Report, which states in the Executive Summary:</p> <p>'With regards to demand, the forecast for employment land is subject to a high level of sensitivity, reliant as they are on employment forecasting data, employment density and plot ratios..'</p> <p>The reason for this sensitivity relates to a number of factors.</p> <p>Firstly, it relies on employment occupiers predicting their requirements 11 years ahead. This in effect is a wish list, the operator may be optimistic and even if their plans are currently realistic they could change dramatically if, for example, there was a downturn in the economy.</p> <p>Secondly, employers may decide to make more efficient use of their current floorspace instead of moving to new premises.</p> <p>Thirdly, it takes no account of factories becoming vacant in the future.</p> <p>Fourthly, much of the recent take up has been by speculative industrial developers, which does not demonstrate actual demand by employers. It also takes no account of land being bought for other uses or for investment purposes. For example there is a quote in another Halcrow Report that the purchase of the BOC site by my client demonstrated demand by employers. This is not correct as the land was purchased to provide a mixed use development as set out below. The same point could be applied to the additional operational land acquired by IKEA surrounding their store at Edmonton.</p> <p>By using the Halcrow figures, which are the most pessimistic, the Consultation Report therefore comes up with the conclusion that there is very limited scope for further employment land release.</p> <p>This has implications for Question 29, which is based on the assumption that there will only be a release of between one and six hectares of employment land in the period up to 2016. The likelihood is that there will be a requirement to release a considerably larger area of employment land to other uses and this goes to the argument of using employment land to satisfy the strong demand for housing and other uses.</p> <p>With regard to Question 30, the difference in figures goes to how the detailed boundaries of the Borough's Strategic Employment Locations should be dealt with when they are reviewed and that a more flexible approach can be taken with regard to uses on these sites.</p>

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				<p>ii) Change in Employment Land Occupiers</p> <p>Apart from the unreliability of these figures they also mask the dramatic change in the type of occupier of employment land.</p> <p>The Halcrow Report states that Enfield has seen a huge decline in the true manufacturing industries over the last decade. This is a natural trend, which Halcrow accepts is probably irreversible. It then goes on to state that: -</p> <p>'In the Borough however the gap in employment terms has been largely filled by the trend for business diversification into distribution, repackaging and service sector.'</p> <p>Clearly, part of the rationale of the Employment Chapter is to provide employment for the occupants of the Borough. What is clear is that a large amount of employment land is being taken by operators with low or very low employment densities and therefore the original rationale of keeping employment land for manufacturing employers is no longer realistic.</p> <p>The Borough should now be taking a more holistic approach to their employment land. Employment land can make an important contribution to mixed-use development, which is promoted both in national and GLA guidance and it can also make a major contribution to regeneration aims. Furthermore, it can provide employment outside the B1, B2 and B8 categories, for example in retailing, education, healthcare, and the service sector.</p> <p>iii) Site Allocations</p> <p>Another issue of inconsistency is with regard to the allocations within which the employment sites fall. In the Halcrow report the BOC site falls within the area that is allocated under EN009/EN014/EN026 – Meridian Way Land/Glover Drive/Kimberley Road. The BOC site is allocated within the Glover Drive area which is allocated as a local employment area which has a subsidiary status below prime employment area. However, although it is not a prime employment area it is still currently allocated as part of the Strategic Leaside Business Area.</p> <p>The part of the Central Leaside Business Area that lies to the east of Meridian Way is predominantly within retail use and no longer retains the image of an industrial area. The site is a very prominent location adjoining the North Circular and has been previously developed on an ad-hoc basis. It is clearly in need of urban regeneration and improvement and requires development that can bring together all of the existing land uses into a comprehensive whole and provide better communications between the uses and substantially upgrade the appearance of the area. Furthermore, the accessibility to the area needs to be substantially improved as once again it has grown on an ad-hoc basis and the present accessibility is clearly unsatisfactory. A mixed-use</p>

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				<p>regeneration scheme for a substantial part of this area would be able to provide these essential elements and create a vibrant and attractive environment for the area. The development of the site for single employment use would not create a vibrant environment as envisaged by PPS1 and the opportunity should be taken to deliver a mixed-use scheme, including employment and other uses.</p> <p>Accordingly, the part of the Central Leaside Business Area to the south of Angel Road and to the east of Meridian Way should be removed from the Strategic Employment Allocations of the Leaside Business Area.</p> <p>We appreciate that this is a matter that will also be looked at in future versions of the Plan and with regard to the proposed Action Area Plan for the Leaside Business Area. Our client, Dwyer, has been in detailed negotiations with both the Local Planning Authority and with economic groups in the area to produce a viable solution for the area and to produce major regeneration benefits. This is referred to in the findings of the Halcrow Study which states: -</p> <p>'The area is considered unsuitable for a change of planning use unless a significant master plan can be drawn up which, given Ikea's recent development, is probably unviable'.</p> <p>Having examined this matter in detail, it has been found that the location or Ikea site can be brought in to a viable master plan that will provide major regeneration benefits for the area in a mixed-use scheme.</p> <p>It is therefore critical that the employment policies in the LDF take a more holistic view of the benefits of developing employment land for mixed-use and regeneration purposes.</p>
Introduction	9.1	Mr Alex Andrews	Principal Planner Transport for London	TfL supports reference to the strategic growth areas identified in the objectives for employment in the borough. A further bullet point should be added that identifies that employment areas must be well served by sustainable public transport which can link jobs with residential areas and deprived communities.
Protecting Employment Land and Improving Job Quality	9.3	Mr Alan Melhuish	Advocate	Para 9.3.1 recognising Enfield has a weak knowledge and high technology economy that overall is in need of modernisation and diversification, a comprehensive review should take into account employment policies being pursued in outlying employment growth areas. Businesses should give detail responses to what attracts them to the area and what would be needed to encourage them to expand.

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Protecting Employment Land and Improving Job Quality	9.3	Mr Daniel Olliffe (Iceni Projects)	Principal Planner The Anderson Group	Paragraph 9.3.4 The case for providing a tiered system of employment land is supported in the main with a two tier approach representing a logical and well thought out policy stance. The Core Strategy must however factor in a degree of flexibility to this approach to allow areas and sites to respond to market trends. An over-prescriptive policy approach could see the potential development of surplus/unsustainable/vacant land stifled by a lack of flexibility. Paragraph 9.3.7 The role SMEs can play in the development and continued vitality of areas is acknowledged and accordingly the need to support the growth of these companies is encouraged. However, the Plan must acknowledge that many SMEs can function alongside residential and/or other complimentary land uses and, in many instances, SMEs can benefit from this land use arrangement. A criteria based policy that opens up this approach should be set out to promote more integrated, sustainable development patterns.
Developing the Skill and Employment Opportunities of Local People	9.4	Mr Glenn Stewart	Assistant Director of Public Health Enfield Primary Care Trust	Para 9.4.2 line accessible jobs means that can be reached by bus, train or foot should also include cycle, particularly in relation to the added distance that a cycle will afford over foot.
Your Views	9.5	Mr Donald Alexander	Hon Secretary Chalk Lane Area Residents' Association	Mixed use is generally to be welcomed but should be applied differently in different locations. More intensive development should only be permitted where local roads can cope reasonably.
Your Views	9.5	Mr Alexander		Mixed use is generally to be welcomed but should be applied differently in different locations. More intensive development should only be permitted where local roads can cope reasonably.
	Question 29	Mr Tony Watts	ECEN Representative Over 50s Forum	Support option 1. Policy in the east of the Borough, adjacent to River and reservoirs should be to encourage leisure and housing at the expense of business. Space immediately alongside these resources should become open space amenities. Encouragement of a water theme park development should be encouraged.
	Question 29	Dr Chris Jephcott	President The Enfield Society	Support Option 2.
	Question 29	Mr Alan Melhuish	Advocate	Balancing demand. 2 Housing should not be permitted to replace small businesses be they pubs, car show rooms, garages and light business use as has been happening. The loss of such employment enterprises which are not just places of work but centres of entertainment encouraging people to stay in local neighbourhoods and not travel must be resisted. The second point is does this have a detrimental effect of attracting new business to the borough because the quality of the environment of homes workers want cannot be met ?

Document Section	Section Number or Question	Name	Organisation	Response
	Question 29	Mr Peter O'Brien	Partnership Manager Learning Skills Council	We commented in section 7 on our general concerns about releasing land that is currently designated for employment being released for housing.
	Question 29		Planning Manager National Grid Property Ltd	As indicated in the consultation document, the Council's Employment Study does suggest that there is potential up to 2016 to release between 1 and 6 hectares of employment land which is poorly located or otherwise poorly suited for employment use. However, location and suitability for employment uses cannot be the only factors determining which sites should be released for other uses. There are other issues which will also need to be taken into account and which include the viability and likelihood that a particular site can and will be developed for employment purposes. It is not simply a matter of having a certain level of supply identified, there must also be a reasonable prospect that the supply identified will become available within the plan period. If land is currently occupied by viable employment uses then clearly it should be safeguarded for that purpose. However, sites such as the National Grid site at Willoughby Lane which have not been in productive employment use for some considerable period of time and which, particularly in terms of viability, have very limited prospect of being brought back into productive employment use due to the prohibitive costs associated with required improvement and remediation works must be considered differently. It is considered inappropriate in land use planning terms to seek to protect such sites for employment purposes. It is of concern that the Borough's Employment Study, in as far as it relates to the sites in National Grid's ownership, does not appear to take into account the particular circumstances and characteristics of those sites. For the avoidance of doubt it is confirmed that the National Grid sites are identified in the employment study as: Site EN09 Meridian Way Land (Otherwise known as the Teardrop site) Site EN014 Glover Drive (National Grid own a small part of this site accommodating the single gas holder) Site EN026 Kimberley Road (Otherwise known as the Willoughby Lane Site), The three sites are jointly identified in the Study as one of thirteen Red Clusters located throughout the Borough. A Red Cluster designation, the Study states, should apply to sites that typically contain vibrant and robust businesses, have predominantly good quality modern buildings and are reasonably well connected to existing transport systems. This description does not accord in any way with the main characteristics of the National Grid sites. Nonetheless, on the basis of this erroneous classification the Employment Study advocates that any change of use should be strongly contested.
	Question 29	Katie Allison (GVA Grimley)	La Salle Investment Management	Given the need to provide a significant number of new homes over the next 10 to 20 years we welcome the promotion of mixed use development and more intensive development at a borough wide level. This should particularly be promoted in areas where employment land is not used to its full potential such as Stonehill Business Park where a well-planned and sustainable development can form part of a new community integrated with its context. The Upper Lea Valley has the potential to become a thriving community for people to live, work and visit which requires a transition from traditional industrial uses to vibrant mixed use communities including residential, commercial and retail uses.

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	Question 29	Mr James Finn (Barton Willmore Planning)	Planner St James Developments Ltd	Our client supports Option 1. The promotion of alternative and more intensive uses such as mixed use and in particular, housing, for employment land which is poorly located or otherwise poorly suited for employment use would ensure that Enfield would best be able to meet and exceed the housing targets set for the Borough as stated in the published Early Alterations in Policy 3A.2 Borough Housing Targets and Table 3A.1 Housing Provision.
	Question 29	Ms Barbara Aldridge	Chairman Enfield Lock Conservation Group	Mixed use development and more intensive development should be allowed only on specific sites after careful scrutiny of the local circumstances.
	Question 29	Mr Patrick Blake	Network Strategy Highways Agency	In principle, the HA would be supportive of policies promoting mixed use and more intensive development. However, it should be recognised that developments in locations with poor access to public transport are likely to generate a greater level of trip demand. As such, the HA would prefer that the maximum level of new development is located in urban centres where it is more likely that a range of opportunities for sustainable travel will exist, or could be provided as part of the development proposal. Should development be located in less sustainable alternatives, in the HA's view the plan could risk failing PPS12 Test of Soundness 7.
	Question 29	Mr Giles Dolphin	Planning Decisions Manager Greater London Authority	The evidence based approach to balancing the demand and supply of employment land is welcomed. In developing the economic and employment policies of the new plan and finalising the figures for the release of employment land for other uses up to 2016 the Council should have regard to the economic and employment policies contained in Chapter 3B of the London Plan, the London Plan Draft Supplementary Planning Guidance on Industrial Capacity (2003), and the recently released Industrial Land Studies (April 2007). The latter, categorizes the Borough as an area for limited industrial land release. The mix of uses developed on land released from employment use should be determined in relation to the local circumstances and reflect the land requirements identified elsewhere in the plan.
	Question 29	Shelagh Gray (Tribal MJP)	SERGO (Slough Estates)	The promotion of mixed use and more intensive development will accord with Central Government guidance contained within PPS1 and also with the London Plan. It is considered that this should be encouraged on specific sites after careful scrutiny of the local circumstances.
	Question 29	Dwyer Asset Management plc	c/o Agent for Dwyer Asset Management plc	Question 29 We consider that mixed-use and more intensive development should be promoted as a general Borough-wide policy on employment land and thus support Option 1.
	Question 29	Ms Jill McGregor (GL Hearn)	Tesco Stores Ltd	Option 1
	Question 29	Gary Thomas (Planning Works Ltd)	Lionsgate Properties	Both options should be promoted.

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	Question 30	Mr Tony Watts	ECEN Representative Over 50s Forum	Support but should be part a place shaping agenda
	Question 30	Dr Chris Jephcott	President The Enfield Society	Possibly, but Innova Park did not show much viability as an employment location.
	Question 30	Mr Andrew Newman	Forty Hill and Bulls Cross Study Group	Yes as it is geographically close and could help with a more unified strategy.
	Question 30	Ms Claire Martin	Policy Officer Lee Valley Regional Park Authority	Protecting Employment Land and Improving quality (Section 9 and Question 30). The Park Authority wishes to see the environment of Enfield's employment areas improved where they are within the Lee Valley and border the Regional Park. Improving the quality of the environment within these sites through better design, increase in open space, habitat creation etc and establishing better links both physical and visual to the Regional Park and its waterside open spaces will support regeneration by helping to deliver an attractive business location and improved access to the Regional Park. Consideration of the transfer of industrial land to other uses should look at open space or leisure use especially where this could complement sites and facilities within the Regional Park.
	Question 30	Mr Patrick Blake	Network Strategy Highways Agency	Given the location of Freezywater Strategic Employment Location in close proximity to Junction 25 of the M25, the HA would be particularly concerned if the Strategic Employment Location was extended to include Innova Park. Developments that are proposed in close proximity to trunk road junctions have the greatest potential to generate traffic impacts on the SRN. Should sites be proposed in close proximity to the SRN, the HA would suggest that policies should require the careful consideration of likely employee travel patterns and the development of tailored demand management measures to reduce potential trunk road impacts. The policy should also identify that developers will be expected to mitigate any residual impact upon the SRN, whether caused by a specific site in isolation or in combination with others.
	Question 30	Mr Giles Dolphin	Planning Decisions Manager Greater London Authority	London Plan Policy 3B.5 requires the new plan to identify Strategic Employment Locations having regard to a series of criteria. The London Plan outlines two categories of Strategic Employment Location of which the Freezywater Strategic Employment Location is identified as a Preferred Industrial Location. The consideration of the boundary of this Strategic Employment Location is welcomed at this time. The proposed extension to include Innova Park, and all others, should be assessed against the criteria contained in London Plan Policy 3B.5.
	Question 30	Dwyer Asset Management plc	c/o Agent for Dwyer Asset Management plc	Question 30 The first part of Question 30 is not a question but a statement, namely: - he new Plan will set out the detailed boundaries of the Borough's Strategic Employment Locations. This is a requirement in the original London Plan (2004) and the latest alterations (2007).
	Question 31	Mr Tony Watts	ECEN Representative Over 50s Forum	Grading system for land usage and development should be introduced

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	Question 31	Mr Peter O'Brien	Partnership Manager Learning Skills Council	We believe that there are options for employment creation that are pivotal to the regeneration of the south-east of the Borough that could be expressed as 'opportunities' rather than the more strictly defined descriptions that are covered in the Plan.
	Question 31	Miss Faye Wilders	Assistant Planner RPS Group PLC	Employment sites other than SELs should be identified on the proposals map to safeguard them from non-employment generating uses. Allocating the best employment sites outside the SEL will retain the better quality sites for employment generating uses.
	Question 31	Mr Andrew Newman	Forty Hill and Bulls Cross Study Group	Yes, no comment, no comment
	Question 31		Planning Manager National Grid Property Ltd	The land in National Grid's ownership is currently allocated as a Local Employment Area in the UDP, and reference has already been made above to the means in which the Employment Study has classified the various sites. Notwithstanding this the sites in question have been unused and vacant for some considerable period of time and will need considerable investment in improvement and remediation works to bring them back into productive use. With regards to the Willoughby Lane site in particular initial assessment has shown that it is highly unlikely that it can be viably brought forward for employment purposes. Furthermore, regard does not appear to have been had within the Study to the fact that the site lies immediately adjacent to residential receptors. Contrary to the findings of the Employment Study, it should be evident that the National Grid sites do not currently contribute to the Upper Lee Valley in any way as productive or vibrant employment sites. It is noted that the Green Clusters classification in the Employment Study most closely relates to the characteristics of the National Grid Sites, and particularly the Willoughby Lane site. Green Clusters are defined as typically: run down, poorly connected to transport infrastructure (often through residential streets) and largely surrounded by sensitive receptors (such as housing). As a result it is recommended that an appropriate change of use is allowed for these clusters. It is of concern that given the conclusions reached by the Employment Study that the National Grid sites, and in particular the Willoughby Lane site, may well be given an Employment Location allocation in the Core Strategy or other Development Plan Document (DPD) comprising part of the LDF. With particular reference to the Willoughby Lane site, if there is no reasonable prospect of it coming forward for employment purposes due to site specific considerations then it should not be identified for employment uses on the Proposals Map. If the site is protected for employment uses the likelihood is that it will remain vacant and undeveloped and it will have very limited, if any, potential for contributing toward economic development targets or regeneration objectives. It is considered that the only reasonable prospect of bringing the Willoughby Lane site back into productive use, particularly in terms of viability, is for redevelopment of the site for housing purposes. Indeed, the appropriateness of the site for housing is already acknowledged in the Glover Drive Development Brief which indicates that there is potential for residential use on this site. Redevelopment of the Willoughby Lane site for residential purposes may also allow, in viability terms, for redevelopment of the remaining two sites in National Grid's ownership for commercial or employment purposes.

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	Question 31	Katie Allison (GVA Grimley)	La Salle Investment Management	It should be recognised that there are employment areas within Enfield that may be better suited to a Borough Employment designation than those that currently have an employment designation such as a Strategic Employment Location. For example Stonehill Business Park currently consists of low density light industrial / commercial uses where there is not a strong demand for intensification of the business park for these uses. It would therefore be appropriate to promote this area for a mixture of employment generating uses and residential uses to create a place that will fit with the aspirations for the Upper Lea Valley. There then maybe the opportunity to promote more thriving employment areas as Borough Employment Locations.
	Question 31	Mr Giles Dolphin	Planning Decisions Manager Greater London Authority	The development of local policies for defined employment sites outside of those identified as Strategic Employment Locations is supported by London Plan Policy 3B.5.
	Question 31	Mr Daniel Olliffe (Iceni Projects)	Principal Planner The Anderson Group	The principle of defining secondary Employment Locations as Borough Employment Locations is supported but there must be flexibility within these areas to allow for future release of land for alternative uses in response to changing market conditions. The Borough Employment Locations should not be set in areas where development of sites would be of benefit to neighbouring uses and in areas where the current urban grain is dominated by residential uses. In this regard, where land use conflicts exist or have the potential to exist, a policy/land use designation which reaffirms an area's suitability for industrial development or gives tacit support for an intensification of industrial development should not be adopted.
	Question 31	Dwyer Asset Management plc	c/o Agent for Dwyer Asset Management plc	Question 31 The Plan should not define and protect the best employment sites outside the Strategic Employment Locations as this is unnecessary in the light of the amount of vacant employment land and could result in sites being sterilised that could be used for other essential development.
	Question 31	Ms Jill McGregor (GL Hearn)	Tesco Stores Ltd	The Plan should continue to protect Strategic Employment Locations; however, to protect all employment sites within the Borough is likely to frustrate regeneration opportunities contrary to the wider sustainability agenda of the Plan. Proposals for alternative use of employment sites outside Strategic Employment Locations should be considered on a site-by-site basis in accordance with national and regional planning guidance.
	Question 31	Gary Thomas (Planning Works Ltd)	Lionsgate Properties	Protecting these 'best' employment sites should only be considered following a proper assessment. Existing use should not be a defining factor in determining best use.
	Question 32	Mr Tony Watts	ECEN Representative Over 50s Forum	Warehousing should only be in employment areas with good road access
	Question 32	Dr Chris Jephcott	President The Enfield Society	Generally 2. Though, traffic infrastructure/noise considerations permitting, too much concentration of uses is bad for diversity.

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	Question 32	Mr Alan Melhuish	Advocate	Diversifying the economy ' there seems to be a contradiction with transportation objectives. Most roads in the borough are too narrow to be suitable for lorries. Allied to that an over concentration of transport onto one road , the north ' south A10 when outside areas are also expanding looks like a recipe for congestion
	Question 32	Miss Faye Wilders	Assistant Planner RPS Group PLC	Major warehousing and logistics companies should be allowed to locate throughout all of Enfield's employment areas. Each proposal should be considered on its individual merits, in order to ensure that it is located in the most appropriate area. In this regard, it seems necessary to allow as broad a platform as possible for the advantages of each site to be assessed against the individual needs of each proposal.
	Question 32	Mr Andrew Newman	Forty Hill and Bulls Cross Study Group	-2
	Question 32	Mr Patrick Blake	Network Strategy Highways Agency	It is not considered appropriate to locate warehousing and logistics operations in locations solely due to good access opportunities with the SRN. The HA expects that each development would be assessed on a holistic basis, with access to sustainable transport considered in addition to access to the SRN.
	Question 32	Shelagh Gray (Tribal MJP)	SERGO (Slough Estates)	It is considered that major warehousing and logistics operations should be permitted in those parts of Enfield's employment areas with the best road access and elsewhere should be restricted in scale unless access can be improved.
	Question 32	Dwyer Asset Management plc	c/o Agent for Dwyer Asset Management plc	Question 32 No comment.
	Question 32	Ms Jill McGregor (GL Hearn)	Tesco Stores Ltd	Option 2
	Question 33	Mr Tony Watts	ECEN Representative Over 50s Forum	Encourage development of well educated populace. Encourage integration of EC migrants and building affordable homes
	Question 33	Dr Chris Jephcott	President The Enfield Society	By adopting a business friendly and clear approach.
	Question 33	Mr Alan Melhuish	Advocate	How best to promote business growth should look to a detail evaluation of initiatives being pursued in surrounding growth areas to establish trends in employment and the nature of competition that has to be faced. As a apart of that strategy, as so much of the borough is a service economy are there opportunities to service those growth areas. Then what skill base is required. Are workers that are being sought those who will come from outside the borough or can educational establishments alter their courses to meet needs ? Explore what employment opportunities can come from cultural activities like craft , arts and artists workshops , practice , rehearsal and performance studios.

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	Question 33	Mr Peter O'Brien	Partnership Manager Learning Skills Council	The Plan could have paid more reference to the work of North London Business and its promotion of the Borough as part of a sub-regional package. For Enfield, the Plan could also have expressed a 'guarantee' to new businesses, enterprise activities with potential for growth and possible inward investment. The 'guarantee' could consist of a total package involving: advice; premises; access to finance; staff recruitment, training and development; and access to markets
	Question 33	Miss Faye Wilders	Assistant Planner RPS Group PLC	The plan would best promote business growth by having a broad definition of uses suitable for employment land, including uses not falling within a use class. The following definition is considered appropriate: 'All buildings which are used or designated for purposes within the Use Class B1, B2 and B8 and closely related sui generis uses (such as warehouse clubs, cash and carry businesses and builders merchants) which are commonly found in industrial estates'. This will ensure the best opportunity for a wide range of businesses to come forward, which will facilitate the supply of high quality, well paid jobs across a broad range of skills and types. Moreover, it will provide a clear framework for the authority to consider proposals that do come forward. It is imperative, however, that the acceptability of proposals for employment-related development is based on their individual merits.
	Question 33	Mr Andrew Newman	Forty Hill and Bulls Cross Study Group	Provide the environment for start-ups to mature into SME and then into large businesses.
	Question 33	Shelagh Gray (Tribal MJP)	SERGO (Slough Estates)	The new Plan should promote business growth through greater flexibility of uses on employment sites, not only with the B Class uses but also to allow appropriate sui-generis uses within employment areas, particularly those sui-generis uses which are vehicle related. This flexibility would accord with the approach of the London Plan.
	Question 33	Dwyer Asset Management plc	c/o Agent for Dwyer Asset Management plc	Question 33 No comment.
	Question 33	Ms Jill McGregor (GL Hearn)	Tesco Stores Ltd	The Plan should promote business growth by adopting a flexible approach to employment land designation. Vacant or underused employment sites should be considered for alternative uses, including retail and mixed use development, as such alternative uses may provide a greater number of jobs than its existing use.
	Question 33	Gary Thomas (Planning Works Ltd)	Lionsgate Properties	By recognising both market constraints and opportunities and then concentrating on promoting the opportunities that exist.
	Question 34	Mr Alan Melhuish	Advocate	The types of employment uses that could be considered would be consultancies and advice organisations, those who have a market based on the areas not tied to local needs to a wider customer base. The key to this are modern facilities with up to date technologies. Allowing office space to be redeveloped as housing as has happened in Enfield Town is the easy option that detracts from making the Town an employment centre. Sponsoring start ups by giving integrated support and assistance packages would help.

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	Question 34	Miss Faye Wilders	Assistant Planner RPS Group PLC	It is necessary to encourage a broad range of employment uses, including sui generis uses that would be appropriate on an employment allocation. The following definition of uses suitable for employment land is considered appropriate: 'All buildings which are used or designated for purposes within the Use Class B1, B2 and B8 and closely related sui generis uses (such as warehouse clubs, cash and carry businesses and builders merchants) which are commonly found in industrial estates'. This will ensure the best opportunity for a wide range of businesses to come forward, which will facilitate the supply of high quality, well paid jobs across a broad range of skills and types. Moreover, it will provide a clear framework for the authority to consider proposals that do come forward. It is imperative, however, that the acceptability of proposals for employment-related development is based on their individual merits, but the council should definitely encourage them.
	Question 34	Mr Andrew Newman	Forty Hill and Bulls Cross Study Group	High tech innovation companies such as software development companies and high tech manufacturing.
	Question 34	Katie Allison (GVA Grimley)	La Salle Investment Management	Clearly there continues to be a substantial shift away from traditional industrial uses to other forms of employment uses such as offices, R&D and creative industries. These should be encouraged so that vast areas of employment space are used to their full potential allowing emerging local businesses to grow and new communities to form. Enfield needs to ensure it is responsive to the relative demand and supply of office / industrial floor space and recognise the opportunities for developing a mix of uses.
	Question 34	Mr Giles Dolphin	Planning Decisions Manager Greater London Authority	In developing policy in relation to diversifying the economy and encouraging enterprise the Council should ensure that the new plan is in general conformity with all of the economic and employment policies contained in Chapter 3B of the London Plan, the London Plan Draft Supplementary Planning Guidance on Industrial Capacity (2003), and the recently released Industrial Land Studies (April 2007).
	Question 34	Shelagh Gray (Tribal MJP)	SERGO (Slough Estates)	In addition to the response to Question 33 above in respect of the need to diversify the economy and provide the opportunity for sui-generis uses, particularly those related to vehicle operations, within employment areas, the Plan should embrace the market requirement for "trader counter" operations which have the characteristics of employment uses both physically and functionally. The inclusion of vehicle related operations and trade counter operations within employment area would assist in diversifying the economy and encouraging enterprise, thereby enhancing employment opportunities for local people.
	Question 34	Dwyer Asset Management plc	c/o Agent for Dwyer Asset Management plc	Question 34 No comment.
	Question 35	Mr Tony Watts	ECEN Representative Over 50s Forum	Encouragement of leisure and culture industry - theme parks along east of borough Encouragement of development of a strong horticultural industry through Crews Hill and Capel Manor With the demands on affordable housing there is scope for encouraging system building pilots that could help Enfield become a centre for such construction With an ageing population there is scope for developing allied service industries

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	Question 35	Dr Chris Jephcott	President The Enfield Society	Maintain further education and skills training.
	Question 35	Mr Peter O'Brien	Partnership Manager Learning Skills Council	We do not find this section of the plan to be a complete enough guide to the Council's policies, strategies and priorities regarding employment and skills. In particular, the Council has not set out in enough detail: - which are the industrial sectors that offer the greatest promise within the Borough? - how might new business activity in these sectors be stimulated and supported? - what existing activity shows sign of growth and how might this growth be encouraged to achieve its maximum potential? - is there any prospect that business activity can be encouraged into the Borough and, if so, what incentives could be offered?
	Question 35	Miss Faye Wilders	Assistant Planner RPS Group PLC	The council should try and encourage companies with a good employment, recruitment and training record. With consideration to employment generating sui generis uses, the Plan should encourage a wide range of companies with a wealth of employment benefits. Costco Wholesale operate a sui generis warehouse club, and are a reputable employer. Overall in the UK, over 90% of the jobs created by a new Costco are filled by locally recruited staff. Throughout the company, staff are encouraged to undertake training and to improve their positions. 85% of Costco's current managers are home grown having worked their way up from hourly paid positions. Positions range from craft and operative jobs for which specialist training is given, to managerial and supervisory jobs and unskilled jobs, which provide a point of entry for those who have little or no qualifications or training.
	Question 35	Mr Andrew Newman	Forty Hill and Bulls Cross Study Group	Encourage high tech businesses.
	Question 35	Ms Barbara Aldridge	Chairman Enfield Lock Conservation Group	New industry in the area should give jobs to local people, this would reduce the need for transport and increased road access. Most jobs on Innova Park appear to be very low paid and short term, employees cannot afford the local housing costs therefore do not settle within the area to form a stable community.
	Question 35	Mr Giles Dolphin	Planning Decisions Manager Greater London Authority	London Plan Policy 3B.5 sets out the Mayor's approach to improving the skills and employment opportunities of Londoners. The new plan should have regard to this policy in developing policies to promote this.
	Question 35	Dwyer Asset Management plc	c/o Agent for Dwyer Asset Management plc	The new Plan can help develop the skills and employment opportunities of local people by applying a broader definition of employment and not restricting it to B1, B2 and B8 uses which are generally in decline.
Transport	10	Mr Norman Smith	Coombehurst Close Residents Association	Cockfosters Road needs to be widened to enable traffic to move through more efficiently.

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Transport	10	Ms Karen Foster-	Planning Liaison Officer Environment Agency	More emphasis should be placed on walking and cycling. An objective should be set to increase the quantity and quality of footpaths and cycleways. These should link into the existing network to enable commuter use and leisure use. The benefits to the population are many, including health benefits through increased physical activity and reduced emissions associated with motorised transport. This would also reduce the number of vehicles on the road and contribute to reducing congestion.
Transport	10	Mrs Elizabeth Henthorn		Transport- not bad apart from the 217 and 317 bus routes.
Transport	10	Anthony Penrose		In researching the area around the proposed building site and the offered exchange land at Rays Road I was surprised to see how isolated and user unfriendly the Angel Road Station has become since the station layout was altered when the Montagu Road flyover was built in 1988. This station should be a major transport hub and properly integrated with the North Circular Road and major Bus Services. The railway line will be an important route to access the Olympic Games via Stratford but more importantly it should be made a convenient means of travelling to and from the many local industrial estates and retail areas. Because of the stations difficulty of access this presently require the use of two car journeys, that causes unnecessary congestion and pollution in the area surrounding the Montagu Road junction with the North Circular Road and the Meridian Way link road, Conduit Lane. If no improvement is made to the station layout the situation will be made considerably worse as a result of the Central Leaside Development Project. Although we would hope that some of the new jobs that the plan predicts will be available to local people, inevitably those works and offices that are expected to arrive, due to displacement from the Olympic Development Site, will bring their own workers, that will create more traffic than causes the congestion now and more land will be wasted in providing garage space. Prior to 1988 the Angel Road Station was entered through the Ticket Hall on top of the single bridge that carried the A406 road over the railway, walkways and steps led passengers under the bridge and they could arrive at either the Up or Down platforms. At that time the scrapyard extended under the bridge arches and occupied all the land south of the bridge right up to the open section of the Pymmes Brook this made access to the station impossible by any other route. Even so the station was fairly well integrated with the Bus Services that use the A406, the 192 route did not exist then. When the A406 road "improvements" were made the North Circular Road, the Councils Meridian Way and the station were not properly integrated. This was probably due to cost, legal matters concerning maintaining land access rights and bickering between the Council an the then Highways Agency. The failure to integrate the services properly at the time, led later to further costs, paid for presumably by the Council, in needing to provide one of the missing slip road between the A406 and Meridian Way. Previous to the connection of Argon Road to the Meridian Way via Glover Drive motorists had been using a route through Tesco's car park and petrol station as a Slip Road. The new connection however has turned Argon Road, which was designed as a service road, into a main road with continuous fast moving traffic flowing in both directions, this situation will get worse as long distance and heavy lorry drivers learn of the new route as they update their road maps of the London area. The road is now dangerous to cross by people walking Westward from the retail

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				<p>areas trying to reach the Bus Stop near Tesco as there is no safe crossing point and no central island to take shelter on. It is possible to see similar problems of failure to integrate roads systems occurring at Bowes Road where the presently proposed TFL scheme to alter the A406 fails to solve existing problems, and creates new ones, on the Council controlled roads in the area. Even though the new N.C.R. was not actually integrated with the Angel Road Station the road designers provided the possibility of rectifying the situation. On the down slope of the Westerly slip road from the flyover they have provided a Bus lay-by that could provide access steps from the no 34 and 444 bus routes to the stations northbound platform. a similar new stairway a few yards east of the bus stop on the eastern side of the railway would allow access to the southbound platform. This modification would benefit all users starting from the Eastern side of the railway from the Estates both North and South of the Angel Road Station. Now that the scrap yard does not extend under the new flyover there is space for a ground level pathway to the Station between the end of the scrapyard and the flyover wall, from a new pathway on the southern edge of the Kenninghall Open Space. That would be convenient for passengers using the station and wanting to transfer to the local Bus Routes or vice versa. The present station access from the bridge over the railway in Conduit Way is not user friendly for workers or travellers to and from any of the local estates or the 192 Bus Route. For rail users from the Eastern Estates to reach the Northbound Platform they need to cross over the railway twice. The Central Leaside Development Plan intends to develop all the estates, it would be possible to improve station use by providing ground level access from the Montagu Industrial Estate by providing a path running from the estate as it exists along the edge of Rays Road derelict land close to the railway line to join up with the existing access pathway that leads to the Northbound Platform. If the estate were to be developed into the Rays Road Site, for quiet non polluting office use, this new path would be even more useful if it had a pedestrian only entrance to the estate via the end of Rays Road that would give easy access from the 192 bus stop to and from the estate and station. Clearly these improvements would amount to a considerable investment in the area but it will be only a relatively small proportion of the money needed to modernise and enlarge all the Local Estates. The investment would however have a continuous payback period in which rail travellers, local workers in the area, motorists and the local environment would gain. These improvements would help Enfield to become a greener borough by reducing the emission of gases that cause global warming.</p>
Transport	10	Mr Patrick Blake	Network Strategy Highways Agency	<p>It is noted that paragraph 10.1.2 of the Core Strategy lists the transport investment priorities that will inform the development of the new Plan. These include:</p> <ul style="list-style-type: none"> • "securing better access to the M25 as part of the Northern Gateway Access Package" • "promoting walking and cycling to enable more people to travel safely within the borough" • "promotion of public transport, cycling and walking to key employment sites" <p>The HA is particularly concerned that improving access to the M25 could undo the benefits of the other proposals within the plan. A focus on improving road-based access to the M25 corridor could encourage a lengthening and greater frequency of car-based journeys on an already highly congested part of the network, which would directly contradict the principles in PPG13 which states that planning should aim to "reduce the need to travel, especially by car" (paragraph 4, point 3). With regard to the Northern Gateway Access Package, the HA would like to reiterate that the</p>

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				<p>creation of a new direct connection between Mollison Avenue and the M25 would be contrary to current government policy which states: "There is a general presumption that there will be no additional accesses to motorways and other routes of strategic national importance" (DfT Circular 02/2007, Planning and the Strategic Road Network, paragraph 41) We would be happy to reconsider any proposals the Council may have, but our original concerns at the time of the 2001 Public Inquiry are still relevant. You will recall these were about the safety of junctions 25 and 26 of the M25 due to increased flows, especially of HGVs. Any scheme put forward will need to demonstrate that it can meet our original concerns and any new ones that may have arisen in the intervening period. As discussed above, we would recommend that the Transport section of the core strategy should focus on the need to encourage sustainable travel. As such we would welcome the inclusion of priorities such as promoting walking and cycling and improving sustainable transport links to key employment sites. In order to align with PPG13 the Plan could usefully develop these policies to also promote improved access to retail, leisure facilities and services by public transport, walking and cycling. Furthermore the HA would suggest that existing transport issues, as well as the potential traffic and transport effects of the proposed developments, should be considered as a proactive input to the sustainable planning process. This will help the new Plan to avoid bringing forward sites that are likely to have a serious detrimental effect on the operation or safety of the SRN.</p>
Transport	10	Ms Anna Chapman	Planner British Waterways- London Region	<p>Waterborne transport Waterborne transport (of passengers and in particular freight) has a role to play in reducing traffic congestion and providing alternative non-car modes of transport improving air quality. The LDF should therefore give recognition to the role of the Blue Ribbon Network for reducing traffic congestion, improving air quality and providing alternative non-car modes of transport through waterborne transport. In the interest of sustainable development and to satisfy a Blue Ribbon Network principle (Policy 4C.14 of the London Plan refers) British Waterways encourages waterside sites to utilise their location for waterborne transport. British Waterways is promoting the use of canals for freight transport and with TfL jointly commissioned Peter Brett Associates to assess the opportunities for the transport of waste, recyclates and construction materials on the West London Canal Network (WLCN). The report concludes that 'there are relatively few sites along the network which can process or handle waste or recyclates, but there are opportunities to develop further facilities'. This work revealed that in certain circumstances (depending on distance and number of locks required to travel through) there is a sound economic case (and environmental and social case) for considering freight by water as a viable alternative to road transport. Clearly, this offers benefits including reduced lorry miles, reduced congestion, reduced carbon emission and reduced number of HGV related accidents. Copies of the full report and the Executive Summary are available on the Transport for London website at: http://www.tfl.gov.uk/tfl/initiatives-projects/freight/report.shtml. The construction cycle for waterside development could potentially be serviced from the canal. Construction waste can be removed by water and building materials and plant can be delivered by water. During occupation there may also be an opportunities for domestic and commercial waste and recyclables to be transported from waterside sites to a Waste Transfer Station (such as London Waste Centre at Edmonton) by water, as demonstrated by LB of Hackney's Waste by Water initiative. The control of dust and emissions from construction and demolition best practice guidance published Dec 2006 by GLA, together with London Councils states: Where construction sites are located near to waterways or railways it may</p>

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				<p>be feasible for construction materials to be delivered or removed from the site using these means, rather than by road. The obvious benefit is that it will reduce the number of trips made by HGVs on local roads, therefore reducing local emissions and disturbance to sensitive receptors. This option is rarely used in London, but developers following this guidance, should try to make use of the waterways wherever possible. The Mayor's draft Freight Plan also seeks to encourage the use of waterways and rail in place of roads whenever practicable. BW therefore requests the LDF acknowledges the positive benefits of transporting freight by water and its potential for transporting demolition and construction waste, construction materials, household and commercial waste, recyclates and other low value, bulky, non time sensitive goods and products. Walking and Cycling on the Canal Towpath The canal towpath can be used to support walking and cycling as forms of active travel between destinations e.g. commuting. To enable the towpath to offer an attractive resource for walking and cycling it is necessary to ensure a walkable and inviting towpath, which can contribute positively to the public realm. BW therefore seeks improvements to the towpath itself (including signage and interpretation and measures such as CCTV, lighting, graffiti removal, towpath resurfacing, landscaping and street furniture) and access to the towpath in the vicinity of a new development as types of on-site transport measures and facilities in order to encourage use of towpath for walking etc. BW believes that towpaths that are under increased pressure from new developments should benefit from section 106 contributions to cater for the additional pressures new development creates, maximise this potential, deliver the above improvements and enable wider public realm, public access and pedestrian benefits from new developments. Comprehensive canal corridor improvements informed through waterspace strategies can help make the canal environment more attractive for walking and cycling. BW sees the Waterspace Strategies as critical tools in managing development pressures and ensuring the added value from the development of waterside sites helps enhance the canal corridor. BW considers that it is essential that the Council and developers work with us to deliver Waterspace strategies. BW has a policy of supporting and encouraging cycling where it is safe and sustainable to do so. Since BW promotes the shared use of the towpaths for walking, cycling, fishing and access to boats, BW is faced by a challenge to manage cycling and potentially increase cycling use in the context of the safety of other users (walkers, joggers, anglers, etc), the biodiversity and the fabric of the waterways. As a result of this shared use towpaths can be hazardous and unsuitable to be identified by the Council (or others) as formal cycleways. BW will not designate the towpaths as formal cycleways and will resist such designations. However BW does welcome recreational cyclists who cycle safely and carefully. Towpaths that are under increased pressure from new development should therefore benefit from section 106 contributions that are sought for wider cycle networks.</p>
Transport	10	Mr Glenn Stewart	Assistant Director of Public Health Enfield Primary Care Trust	<p>It is good to note the commitments to: Promoting walking and cycling to enable more people to travel safely within the borough · Promotion of public transport, cycling and walking to key employment sites. The second point though should add shopping, amenities and leisure sites.</p>

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Transport	10	Mr Alex Andrews	Principal Planner Transport for London	The LDF should include a number of more specific strategic objectives for the borough. For example bullet points should be added for the following (including reference to the London Plan and Sub-Regional Development Framework for North London): Sustainable public transport, including bus routes and corridors, walking and cycling · Seeking to reduce overall reliance on cars through ownership and use Role of Upper Lea Valley Role of Enfield town centre Improving east west links in the borough Assessing key arterial links into London, including A10 and rail.
Introduction	10.1	Mr Alan Melhuish	Advocate	Para 10.1.1 poor access leading to economic decline and social exclusion needs a more integrated strategy. The focus seems to be tied to what needs to be provided to make new developments viable. Little consideration has been given to services to existing developments or how they may be improved. In talking about access to public transport the greater attraction of locations within walking distance of tube and train stations appears not to have been highlighted , not least for the way property prices have a premium much as homes within catchment areas of some highly regarded schools. Mobility and ability to be mobile need to be considered. Central to this are the public access provisions of community transport providers , whether they need better funding and the alternative many rely on where they is no adequate service, minicabs. Should older people have access to subsidised minicabs services ?
Introduction	10.1	Dr Frederic Clark	Hon. Secretary Trent Park Conservation Areas Advisory Committee	(10.1.1) Transport can also provide choice about where to shop, making some areas easier to shop and others more difficult
Introduction	10.1	Mr Donald Alexander	Hon Secretary Chalk Lane Area Residents' Association	10.1.1 Transport can also provide choice about shopping, positively and negatively. 10.1.1 (12) Include in the objective "improve the quality of life by reducing traffic jams and vehicle pollution". Promotion of cycling should be limited to specific areas unless we want to increase the number of road casualties. Most roads are not suitable for mixed traffic, and cyclists are nine times more likely to be killed or injured than car passengers.
Introduction	10.1	Mr Alexander		10.1.1: Transport facilities can also affect one's choice of where to shop 10.1.1(12): Include in the objective "improve the quality of life by reducing traffic jams and vehicle pollution"10.1.2 Promotion of cycling should be limited to specific areas unless we want to increase the number of road casualties. Most roads are not suitable for mixed traffic, and cyclists are nine times more likely to be killed or injured than people in cars, Also they are only too often a severe hazard to other road users
Introduction	10.1	Ms Barbara Aldridge	Chairman Enfield Lock Conservation Group	Transport in the Upper Lee Valley - east west crossing and access to M25 (paragraph 10.1.2 & 11.1.6). E.L.C.G does not wish to see an east/west road across Rammey Marsh to improve access to M25. This is area green Belt and a public amenity. The Northern Gateway Access Road was refused at public enquiry. Since then the need for this road has been reduced. Building of the extensive waterside housing estate and the Oasis Academy on Innova Park has reduced the need for access for industrial transport. Both these sites had vision statements emphasising low road use. There is also emphasis and need to have local workers within this plan (Key Issue 17). An additional road will divert traffic accessing or leaving the M25 from the A10 eastward onto Mollison Avenue, this would increase the use of short cuts within Enfield Lock when traffic is slow. The roads within the Lock are narrow and unable to cope with the large quantity and size of vehicles that are using

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				them now.
Introduction	10.1	Mr Alex Andrews	Principal Planner Transport for London	10.1.2 Makes reference to Enfield LIP (at the time of writing these comments being assessed by TfL) and as a result has not been finalised.
	Strategic Objectives	Mr Mark Hayes	The Chair Enfield Housing Association Forum	10.1.2. While strongly supporting the need to secure better railway services, a policy needs to be developed in response to the "barrier" created by the West Anglia route on the eastern side of the Borough. Key routes are closed for long periods at level crossings, causing major problems for other modes of transport, particularly bus services. An imaginative "bridging" of the West Anglia line would overcome this. The physical environment of the railway, particularly the West Anglia stations, also needs to be addressed.
Transport and Land Use	10.2	Mr Alan Melhuish	Advocate	10.2.3 development proposals which routinely set out predicted impacts on transport networks do not assess how linked provisions of shopping and employment centres in local neighbourhoods related to those developments would promote walking. The contradiction is that to have a successful development it is anticipated that increased user numbers wanting to access public transport will be emerge. This does not address how that contributes to the increasing congestion that is happening on the borough's roads which will be acerbated by the London - Cambridge corridor growth area passing through the borough, but should.
Transport and Land Use	10.2	Mr Alexander		10.2.1: Add that both north-south and east-west traffic is funnelled to a few roads that get heavily congested and most need improvement
Transport and Land Use	10.2	Mr Alex Andrews	Principal Planner Transport for London	10.2.1 The LDF identifies that traffic congestion is a major issue in Enfield and states that the borough is served relatively well by public transport. TfL urges the LDF to provide more information on how congestion can be reduced and how public transport can be better utilised. 10.2.2 Support reference to the relationship between development and transport capacity and the location of people close to public transport. However this should be extended to make explicit reference to the London Plan, Sub Regional Development Framework and Mayors Transport Strategy. 10.2.3 Support reference to transport assessments and travel plans. However more emphasis should be placed on their role in reducing car use and transferring trips onto public transport. Reference should be made to TfL Transport assessment best practice guidance (May 2006), which provides a starting point for assessments. TfL urges the borough to include a separate policy which deals with each of these documents. Support reference to setting out mechanisms for securing contributions from developers. TfL requests that this is extended further to state that the borough will work with TfL and

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				developers to plan for and contribute towards sustainable public transport and highway improvements. TfL urges the borough to include a specific policy in the LDF which provides guidance on s106 contributions for transport, including a 'pooling' framework, for example: 'Contributions will be sought for transport infrastructure and service improvements to ensure that efficiency and capacity on the transport network is maintained and that the impact of the development on the transport network is mitigated. In circumstances where the combined impact of a number of developments creates the need for the provision of additional transport infrastructure and or services, it will be appropriate to pool the contributions from these developments. The level of contribution, whether pooled from a number of developments or not, may be based on a formula or standard charge which reflects the actual impact of the development'.
Parking	10.3	Mr Alan Melhuish	Advocate	Para 10.3 - parking. No strategy for car club shared car usage is considered. Views over whether the congestion and environmental benefits of such a scheme should be included must be addressed
Parking	10.3	Mr Norman Smith	Coombehurst Close Residents Association	There should be more provision of underground and high-rise parking to cope with the increase in car use.
Parking	10.3	Mr Peter Smith	Over 50s Forum	Ref the item off street parking, the suggestion of restricting the use of off street parking by house holders would be a retrograde step, The Enfield Plan Page 48 Parking, They do not go to that expense of making provision of this by choice, it is done to ensure they are able to park at their own residence, and have a less chance of having their vehicle damaged visitors, tradesmen, dustmen & emergency services have access to that address, the plus side is frees up the road for what it was intended, the passage of traffic. I do not see it is the councils remit make on street parking available and turn roads in to car parks, if people are not able to park at certain location they are more likely to use public transport there, as a car driver that is what I do. As to the use of front gardens for parking to me, it is to me an efficient use of land, as a non gardener it is the finest thing I have done and ensures it is neat and tidy at all times. As to water run off I fail to see the problem, or is the problem the water companies drainage systems are inadequate to cope, this additional water during rain fall if properly managed could be channel and stored back to the aquifers ready be used during the dry times, it is called water management. What I do take the council to task on is their failure to enforce the need for those using off street parking to have a proper installed dropped kerb. All so it has become so congested on certain residential roads by parked vehicle, in ones that are only three lanes wide, it impossible for vehicles coming from opposite direction to pass, so these should be identified and one way traffic installed.
Parking	10.3	Mr Alexander		10.3.6: Setting maximum parking standards for new developments would increase anti-social street parking, etc. It would also make many new developments unattractive compared with existing more lax areas. It could well lead to more paving over of gardens, giving drainage problems
Parking	10.3	Mr Matthew Roe (CgMs)	Senior Associate Director Metropolitan Police Authority	The MPA recommend the Council's transport policies recognise that the operational needs of the police influence their car parking requirements.

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Parking	10.3	Mr Alex Andrews	Principal Planner Transport for London	10.3.1 The LDF will need to demonstrate from the onset that car parking provision will be in accordance with standards set out in the London Plan. This includes implementation of maximum standards that reflect the relationship between public transport accessibility and density. It should also give consideration to car free development, travel plans and car clubs where appropriate. It will be the role of the transport assessments and travel plans to identify what level of car parking is appropriate for a specific development. The LDF should also refer to specific car reduction measures such as car sharing, car clubs, cycle clubs and general travel demand management measures.
Parking	10.3	Kate Tinsley (Peacock and Smith)	WM. Morrison Supermarkets PLC	In terms of transport, we note that the draft Core Strategy advises that details of parking standards will be set out in the Council's Development Standards Supplementary Planning Document (Paragraph 10.3.6). Wm. Morrison Supermarkets plc consider that the base maximum standard for car parking associated with new food retail developments should reflect recent Government guidance set out in PPG13. Whilst PPG13 sets out at Annex D the maximum car parking standards (for food retail of 1,000 sq.m. gross floorspace and above the standard is one space per 14 sq.m.), para. 56 of the PPG notes that a balance has to be struck between encouraging new investment in town centres by providing adequate levels of parking, and potentially increasing traffic congestion caused by too many cars. It is noted that where retail and leisure developments are located in a town centre, or on an edge-of-centre site as defined by PPS6, Local Planning Authorities should consider allowing parking additional to the relevant maximum standards provided the Local Authority is satisfied that the parking facilities will genuinely serve the town centre as a whole and that agreement to this has been secured before planning permission has been granted.
Public Transport	10.5	Mr Alex Andrews	Principal Planner Transport for London	The section on public transport is welcomed but should ultimately provide more details on specific transport modes. TfL urges the borough to separate this section out under specific modal headings and include a commitment to addressing how they will be improved, to include for example: London underground National Rail Bus Provision/ Bus Infrastructure Walking Cycling TfL welcomes use of a PTAL map, but urges the borough to include a map illustrating key transport infrastructure.
	Question 36	Mr Tony Watts	ECEN Representative Over 50s Forum	It is important that the place shaping agenda is adhered to so that impact of any developments are reflected on all services
	Question 36	Dr Chris Jephcott	President The Enfield Society	Desirable, but Borough has little direct control over public transport provision.
	Question 36	Mr Alan Melhuish	Advocate	A survey needs to be carried out to establish travel pattern preferences, the catchment areas of shopping and employment centres and were people travel from to reach those centres. The Council could do a survey of its own workers to establish why so many travel long distances from out of borough areas to get to work. Is there a message about a lack of training provisions in the borough that this highlights ? The free movement of people and vehicles about the borough needs more thought. Encouraging local shopping accessed by walking rather than the car, road side parking that reduces road widths below acceptable levels, local resident parking on existing streets in preference to the casual visitor, issues that encourage people to want to live and stay in their home area. Matters of the existing road networks that meet comparable standards of access for emergency

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				services to those on new developments. Improved car club and community transport provision as well as public transport in hard to reach local areas.
	Question 36	Mr Andrew Newman	Forty Hill and Bulls Cross Study Group	Essential
	Question 36	Mr Alexander		Implement the requirement to restrict parking selectively. General unsympathetic application would reduce the quality of life and lead to much anti-social parking and the paving over of gardens
	Question 36	Ms Karen Foster-	Planning Liaison Officer Environment Agency	The new plan should require the development of new services to be phased in line with appropriate improvements to public transport. The Plan should include the enhancement of alternative methods of public transport and reducing the need to travel as a strategic objective. The London Plan and the Mayor's Transport Strategy aim to change travel behaviour and manage demand for car use through targeted initiatives to encourage behavioural change combined with effective transport alternatives to discourage car usage. The Enfield Plan should reflect these policies. Transport and spatial planning should also aim to achieve improvements in local air quality. The London Plan requires that environmental constraints on polluting activities be applied.
	Question 36	Mr Patrick Blake	Network Strategy Highways Agency	The HA believes that it is vital that development does not take place at a faster rate than the provision of any related infrastructure requirements, as this could lead to impact occurring on the SRN. The HA would be supportive of the provision of early guidance to developers, preferably at pre-application stage, to allow the required infrastructure to be installed within an appropriate timeframe. Emphasis should also be placed upon the controlled release of development such that an imbalance does not occur during the progression of the development, either at an individual site level or at more strategic level with adjacent complementary developments. There is a risk that market demand will result in residential development, for example, being completed prior to any complementary employment, resulting in the establishment of long distance commuting; which does not align with PPS12 Tests of Soundness 4 and 7.
	Question 36	Mr Alex Andrews	Principal Planner Transport for London	There should be a link between transport and community facilities but it is not always appropriate to phase these developments based on transport infrastructure coming forward. The borough will work with TfL and developers to address how infrastructure and financial contributions for transport can be delivered as early as possible to support community facilities.
	Question 37	Mr Tony Watts	ECEN Representative Over 50s Forum	As far as possible developments should have easy access to public transport.
	Question 37	Dr Chris Jephcott	President The Enfield Society	Both options may apply in different circumstances

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	Question 37	Mr Alan Melhuish	Advocate	tying residential development to transport accessibility is a fundamental of the Mayor's London Plan. Is there any way to tax parking associated with housing development so that homes with multiple car ownership of up to 5 or 6 cars can be penalised.? Obtaining financial contributions from developers for the provision of public transport seems an obvious necessity. What is not understood is at what size of development should this apply to as we are led to believe that few large housing developments are likely in the borough in the future. If this is a correct understanding there will be little scope for such developer funded responses to the public transport / walking debate and some other proposal needs to come forward.
	Question 37	Mr Andrew Newman	Forty Hill and Bulls Cross Study Group	-1
	Question 37	Ms Karen Foster-	Planning Liaison Officer Environment Agency	The new plan should require the development of new services to be phased in line with appropriate improvements to public transport. The Plan should include the enhancement of alternative methods of public transport and reducing the need to travel as a strategic objective. The London Plan and the Mayor's Transport Strategy aim to change travel behaviour and manage demand for car use through targeted initiatives to encourage behavioural change combined with effective transport alternatives to discourage car usage. The Enfield Plan should reflect these policies. Transport and spatial planning should also aim to achieve improvements in local air quality. The London Plan requires that environmental constraints on polluting activities be applied.
	Question 37	Katie Allison (GVA Grimley)	La Salle Investment Management	Opportunities should be considered for improving accessibility to the Upper Lea Valley so that new communities are well connected and integrated with transport connections and interchanges. Improved public transport connections will ensure that the Upper Lea Valley can be developed to its full potential and regenerated as a place to live, work and visit.
	Question 37	Mr James Finn (Barton Willmore Planning)	Planner St James Developments Ltd	Our client supports Option 2.
	Question 37	Mr Patrick Blake	Network Strategy Highways Agency	1.Require developments to be located in areas of good public transport provision? It is noted that paragraph 10.2.1 states that development should occur in areas of good public transport and that outside of these areas, growth should be phased until transport needs can be met. In order to ensure that LDF policies are sustainable and meet the requirements of PPG13, the strategy should emphasise that public transport improvements, rather than transport improvements in general, should be the necessary precursor to growth. 2.Where development is located away from key services and good public transport provision, seek contributions from the developer to improve the transport infrastructure? The HA expects the LDF to incorporate policy mechanisms to minimise demand at the source. We would not support a strategy which sought to provide costly new infrastructure measures without first identifying and implementing alternative sustainable options in line with the objectives of PPG13. These may be achieved through options such as demand management and traffic management mechanisms. In order to reduce the extent to which congestion worsens in the future, we require the mitigation of SRN impacts throughout all stages of

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				development planning, implementation and operation in accordance with DfT Circular 02/2007. Where a number of development sites are proposed in close proximity to the SRN, the HA would advocate a joint working approach to provide a package of measures to manage demand and also provide, as a last resort, funding towards infrastructure that will have a direct benefit in relieving pressure at specific points on the SRN. The HA strongly recommends that Enfield Council ensures that clear advice is contained within policy regarding the need for potential developers to manage the growth in traffic demand that will result from the proposed sites, and to mitigate their impacts where necessary. To this end, it is noted that the Core Strategy states that development proposals now routinely set out their predicted impacts in a TA. The HA welcomes the efforts made by Enfield Council to encourage this practice amongst developers. To further reinforce the need for TAs to developers we would recommend that plan policy should outline the thresholds above which TAs should be required. Furthermore it is noted that paragraph 10.2.3 states that TAs may contain a Travel Plan. In order to emphasise the importance of travel plans in ensuring that sustainable travel goals are achieved, the HA would recommend that policy should make Travel Plans a requirement for all developments that produce a TA. The requirement for a Travel Plan should apply to all types of development, including residential sites. In addition Travel Plans should specifically require the consideration of targets based on robust forecasting, monitoring, incentives for compliance and a funding stream to maximise their potential for success. Sustainable measures that are offered through these plans should be secured via appropriate planning mechanisms. Inclusion of the above recommendations would help to ensure that the new Plan is fully aligned with PPS12 (paragraph 4.24) Tests of Soundness 4 and 7.
	Question 37	Mr Glenn Stewart	Assistant Director of Public Health Enfield Primary Care Trust	This is a chicken or egg question, if a development cannot take place where there is already good transport then contributions from the developer should be used to improve the transport infrastructure. The transport infrastructure though should include provision for walking and cycling as well as buses / trains.
	Question 37	Mr Alex Andrews	Principal Planner Transport for London	New development should be intrinsically linked to public transport infrastructure as advocated by London Plan policies. Developers should be expected to contribute towards public transport improvements where developments are not directly linked to transport infrastructure. TfL urges the borough to develop a framework (as suggested above by way of policy in the emerging LDF) to provide guidance on how contributions can be pooled and collected.
	Question 37	Ms Jill McGregor (GL Hearn)	Tesco Stores Ltd	Options 1 and 2
	Question 37	Gary Thomas (Planning Works Ltd)	Lionsgate Properties	Any contributions should only mitigate the impacts from a particular proposal.

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	Question 38	Mr Tony Watts	ECEN Representative Over 50s Forum	All new residential dwellings should have off street parking for 2 cars Conversion to multi-occupancy should have similar criteria. Where parking bays have been allowed under old regulations and parked cars overhang the public footways parking wardens should have responsibility for penalising offenders. Regulating car parking cannot reduce car travel. More local employment for residents will have more impact.
	Question 38	Dr Chris Jephcott	President The Enfield Society	Reducing the overall number of motor vehicles should be the aim, if unrealistic. Local parking restrictions are unlikely to contribute much to this. It would be very useful to look at the experience of other urban areas for examples of success in dealing with this intractable problem that could be applied to Enfield. Ubiquitous traffic now does more harm to our streetscape than any other factor. As mentioned above paved over front gardens should be designed to as to minimise run-off.
	Question 38	Mr Alan Melhuish	Advocate	Community and business developments thrive on accessibility via the car. After decades where cars have been given preferential treatment old habits die hard. Without the car and adequate car parking people go elsewhere. One way is to reverse the policy of allowing shops , businesses and offices to be demolished to make way for more housing. Put more emphasis on living locally ‘ working and shopping locally so that walking is advanced as the preferred way of getting about. For times when larger purchases and employment needs demand trips out of the area link in to internet shopping / home working centres and clubs then advocate retailer home deliveries and services so that people have a reduced need to use a car to carry goods home and hopefully use public transport more frequently.
	Question 38	Mr Andrew Newman	Forty Hill and Bulls Cross Study Group	Council should allocate residential parking, on and off the street. Most people do not have a cross over to increase capacity but to ensure that they have a parking space.
	Question 38	Mr James Finn (Barton Willmore Planning)	Planner St James Developments Ltd	The amount of car parking provided in development proposals should be determined in accordance with market-demand.
	Question 38	Mr Patrick Blake	Network Strategy Highways Agency	It is noted that paragraph 10.3.4 of the Consultation Report expresses the need to overcome an existing shortfall in residential parking. The HA would welcome measures which seek to manage the demand for parking and therefore supports proposals such as "reducing the need to travel and encouraging more sustainable and realistic alternatives to the use of the car, introducing restrictions on the paving over of front gardens for parking in some areas and the promotion of car clubs and residential travel plans". Furthermore it should be noted that the London Plan, policy 3C.22, states:” The Mayor, in conjunction with boroughs, will seek to ensure that on-site car parking at new developments is the minimum necessary and that there is no over-provision that could undermine the use of more sustainable non-car modes. The only exception to this approach will be to ensure that developments are accessible for disabled people.” It is therefore essential that the new Enfield Plan sets out parking standards for all types of development in line with those in the London Plan. If separate standards are adopted, it is the HA's view that the new Plan could risk failing PPS12 Test of Soundness 4.

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	Question 38	Mr Glenn Stewart	Assistant Director of Public Health Enfield Primary Care Trust	On and off-street parking should be dealt with as part of an overall strategy to increase the transport percentage of other modes of transport. Parking is one aspect of the dominance of planning for car ownership. In specifically dealing with on and off-street parking thought should be given to the costs of that parking, who pays and who should pay.
	Question 38	Mr Alex Andrews	Principal Planner Transport for London	Car parking restraint should be encouraged in the borough and this can be implemented through various means, including a reduction in car ownership and car use, provision of car clubs and car sharing, and by promoting a wide variety of travel demand management measures.
	Question 38	Ms Jill McGregor (GL Hearn)	Tesco Stores Ltd	Tesco recognises the need to promote sustainable travel however, car parking requirements for new developments within Enfield should be provided in accordance with the parking standards of the London Plan.
	Question 38	Gary Thomas (Planning Works Ltd)	Lionsgate Properties	The Plan needs to recognise existing car ownership levels and aspirations in the Borough and ensure suitable alternatives exist to encourage non-car travel when appropriate.
Key Places for Change	11	Mr Alan Melhuish	Advocate	After the failure of Phase 2 of Innova Park to be developed for commercial uses as envisaged ' keeping abreast of changes in business provision and needs should be maintained. For this, the Council should have a business investment / development advisory unit working in liaison with businesses and educational trainers about future requirements. Associated with this , the plan discusses opportunities of activities based on renewable energy and green industries in business . Add to that the emerging need for Corporate Responsibility you have a basis for refreshing local business provision. From this , links need to be identified of the barriers to be overcome and the collaboration with business to promote sustainable development not just in employment but housing needed for workers. Have businesses been specifically invited to comment on these proposals ? If their requirements are fundamental to realising a sustainable plan they should be expected to have a say.
Key Places for Change	11	Ms Karen Foster-	Planning Liaison Officer Environment Agency	We wish to see an objective included in this section which addresses access to the water environment. This would include access to the waterside for walking and cycling as well as access to the water itself for activities such as canoeing and angling. This would help to meet the requirements of suggested objectives 13 and 14 by improving social well being through providing an attractive, accessible environment for people to enjoy. There would also be economic benefits through water-related recreation. For example, promoting long distance walks or cycle routes through the Lee Valley can mean that users of these routes spend money in shops or require overnight stays. Likewise studies have shown that angling and canoeing bring economic benefits to local communities where these activities are promoted and the infrastructure is in place to support the activities.

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Key Places for Change	11	Ms Anna Chapman	Planner British Waterways- London Region	BW supports the general vision for Enfield Lock, Ponders End & Columbia Wharf and Pickett's Lock. BW would like to encourage better use of the land surrounding Wharf Road at Ponders End. The area benefits from a number of water courses and has some attractive green space but has great potential for a more intensively developed, residential led mixed use scheme which would benefit from the close proximity of Ponders End station and would create a gateway to the Borough from the east where the road passes between the William Girling and King George's Reservoirs.
	Strategic Objectives	Mr Tony Watts	ECEN Representative Over 50s Forum	
Upper Lee Valley	11.1	Dr Chris Jephcott	President The Enfield Society	11.1.3. The N London Strategic Alliance offers the best hope in achieving these desirable objectives,, in particular upgrading the rail corridor.
Upper Lee Valley	11.1	Mr Steve Austin	Town Planner Network Rail	Operational Issues Network Rail are investigating the closing of the level crossings in the Lea Valley and then implementing an increased option for capacity. This would be through the introduction of 4 tracking between Tottenham Hale and Cheshunt/ Broxbourne. There are also considerations for 9 car operations on the Liverpool St - Lea Valley - Hertford East route and on the Southbury Loop, and possibly extending the Cheshunt and Broxbourne route to 12 cars.
Upper Lee Valley	11.1	Ms Claire Martin	Policy Officer Lee Valley Regional Park Authority	Key Places for Change - the Upper Lea Valley (ULV). The Authority wishes to see the Council's Core Strategy and subsequent Area Action Plans identify: - the strategic importance of the Regional Park in providing sustainable links from the ULV to the Olympic Park and the Thames Gateway via water transport/walking/cycling, and - within the Borough a range of projects for the Green Grid which will improve access and open up the reservoirs to local communities. Transport improvements to resolve poor east-west access and inadequate access to the M25 should not lead to any road provision that adversely impacts on the Regional Park. The Authority wishes to be involved in future discussions on this matter particularly in relation to the Central Leaside Business Area and North East Enfield.
Upper Lee Valley	11.1	Ms Barbara Aldridge	Chairman Enfield Lock Conservation Group	Within this section there is comment that improvement in the transport links particularly the rail link from London to Cambridge will unlock development options in the area (paragraph 11.1.2) E.L.C.G. ask that this be looked at very carefully with regards to Enfield Lock. The original Enfield area, including the Conservation Area is dwarfed by 2 very large projects, Enfield Island Village and the still to be completed Innova Park, plus numerous smaller but significant high density in-fill and rebuild sites. The area should not be eroded with any more new estates or industry. Time is needed to allow for infrastructure improvement and for the local community to assimilate the vast changes that have occurred during the last 10 years. Both these sites take advantage of the water links and views in contrast to the description (paragraph 11.1.1)
Upper Lee Valley	11.1	Mr Graham Saunders	Senior Regional Planning Advisor English Heritage - London Region	Elsewhere it is welcomed that a long term strategy is being considered for the Upper Lea Valley, but again it should be noted that within this area there are a number of heritage assets that should be carefully understood and assessed before any proposals for change are developed. A key area is the Tottenham High Road/Fore Street/Hertford Road area, which contains a range of listed building and conservation area designations. We would suggest that the vision for the Upper Lea Valley should include the objective of understanding and appreciating the areas heritage assets and wider

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				historic environment as a basis in which to develop high quality design that responds positively to its context.
North Circular Road	11.2	Dr Chris Jephcott	President The Enfield Society	11.2.3. We have commented previously on the AAP for the North Circular Road, which we consider to be a good idea.
	Question 39	Dr Chris Jephcott	President The Enfield Society	Agree
	Question 39	Mr Peter O'Brien	Partnership Manager Learning Skills Council	Yes. The proposals offer an unique opportunity to develop key places for change for the benefit of the local residents. We encourage greater joint planning with other neighbouring authorities through the North London Strategic Alliance.
	Question 39	Ms Georgie Cook	Town Planning Administrator Thames Water Property Services	Question 39 The Upper Lea Valley. We support the strategic objectives for Section 11 of the Core Strategy. We particularly support the need to improve the environment, infrastructure and economic and social well being of North East Enfield and Central Leaside. There will be requirements to upgrade our infrastructure in North East Enfield and Central Leaside, and we would support policies that enable our infrastructure to be provided in a timely and sustainable fashion. King George V and William Girling Reservoirs. Of particular importance to Thames Water in providing water to London are the King George V and William Girling reservoirs located along the Lee Valley. We note their value as a visual, ecological and recreational resource, but their most important role is in helping to provide water for London and this fundamental role should not be compromised by policies that undermine our ability to provide potable water for London or could restrict the future upgrade and improvement of our infrastructure. Through Thames Water's Property and Conservation strategies we do consider the potential for access and use of our existing assets where appropriate. There is limited restricted public access in the form of sailing on the King George V Reservoir but this does not extend to general public access. Both reservoirs have strict general public access controls because of security and health and safety requirements. Security and health and safety requirements are our number one priority in supplying water via our reservoirs along the Lea Valley and thus this strict access control is unlikely to change in the foreseeable future. Discussions between Thames Water, Enfield Borough officers and their consultants are taking place to consider opportunities to enhance the Lea Valley Park without compromising on Thames Water's responsibilities as a statutory undertaker. However at this early stage we would not be in a position to support policies that sought the opening up of access to the Reservoirs. Ponders End. Thames Water would support opportunities for mixed use and leisure development in this location and would welcome further discussion with the Borough Council.

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	Question 39	Ms Karen Foster-	Planning Liaison Officer Environment Agency	We agree with the vision in its promotion of the Upper Lee Valley as North London's waterside however there are environmental opportunities and constraints which will need to be assessed in order to realise this vision. Section 226 of the NLSRFD identifies that the growth and redevelopment of riverside sites creates opportunities to restore and enhance river corridors. Action 4F identifies the need for boroughs to implement the North London River Restoration Strategy.
	Question 39	Katie Allison (GVA Grimley)	La Salle Investment Management	The North London Strategic Alliance's draft vision will inform the Upper Lea Valley Opportunity Area Framework. We support the vision to make better use of urban land accommodating more housing and businesses and to improve transport connections to Central Leaside and Stratford as well as enhancing internal connectivity. We welcome the draft vision's acknowledgement that Central Leaside has the greatest potential for planned intensification and change in the Upper Lea Valley. This area has significant potential which requires unlocking. To do this low intensity employment areas such as Stonehill Business Park provide the opportunity to develop mixed use communities including residential and employment space. The Upper Lea Valley's unique assets can be better used and promoted by regeneration of this key area. To do this employment locations such as Stonehill Business Park need to be considered for regeneration to create the new homes and business required in the Upper Lea Valley.
	Question 39	Ms Barbara Aldridge	Chairman Enfield Lock Conservation Group	E.L.C.G. have concern about further waterfront development (paragraph 11.1.3), does this mean more open space along River Lee or more encroachment? Proposals for transport and waterside development (paragraph 11.1.4) -Innova Park improved links - Public transport improvement is needed. -Lee Valley Park - public access to reservoirs owned by Thames Water. This causes considerable concerns about public safety. Also unlimited public access would inevitably cause disturbance of this valuable SSSI site, which is currently an asset for Enfield.

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	Question 39	Mr Patrick Blake	Network Strategy Highways Agency	It is understood that the Upper Lee Valley is an area with a particularly low PTAL rating. If the regeneration envisioned for the area is to be achieved, the HA agrees that the "Upper Lee Valley will require a much higher level of public transport accessibility" as stated in paragraph 11.1.7 of the Core Strategy Consultation Report. The draft vision for the Upper Lee Valley proposes to improve links to the Innova Park, including links to the M25. As mentioned above the HA is concerned that improving access to the M25 would directly contradict policies in PPG13 which state that "planning should reduce the need to travel, especially by car." The strategy acknowledges the importance of enhanced public transport in ensuring that extra trips are not generated on the A406 North Circular, which is under severe pressure. However the strategy fails to acknowledge the importance of guarding against unsustainable trip generation on the M25 which is also under severe pressure. As noted in a letter sent from the HA to Enfield Council on 11 May 2007, an evaluation should be conducted as backup to the Core Strategy to confirm that there is a realistic expectation that the impact of development can be mitigated. With regards to development in the Upper Lee Valley area we would suggest that such an evaluation is necessary. A simple assignment model (possibly obtained from the Greater London Authority or TfL) could initially be used to identify the transport infrastructure issues resulting from development proposals, which need to be addressed. Such an evaluation should then inform the nature and content of the policies in the Core Strategy. Without such a study, the HA is concerned that the new Plan could risk failing PPS12 Test of Soundness 7. It is noted that the council could investigate opportunities to maximise supporting infrastructure in the Upper Lee Valley Opportunity Area through the Area Action Plans (AAPs) for Central Leaside and North East Enfield. The HA would expect that opportunities to promote sustainable travel and options to reduce the need to travel, will be investigated in the AAPs, especially given the corridor's low public transport accessibility levels.
	Question 39	Mr Giles Dolphin	Planning Decisions Manager Greater London Authority	The objectives of the draft vision North London's Waterside, a place for people and business, a space to grow, to start and stay as set out in paragraph 11.1.3 are broadly supported. The Mayor has not yet given his formal opinion of the document but officer level comments have been given. Prominent amongst the officer level comments are: the vision should not include any proposals involving development on Green Belt or Metropolitan Open Land. The proposal for a strategic body for the area along the lines of a development corporation are not supported. The Greater London Authority is the strategic body for the area. the Mayor has clearly stated that the extension of the Victoria Line or Jubilee Line to serve the area is an unrealistic expectation at the present time. The reference in paragraph 11.1.3 to working in partnership with the Mayor to produce the Opportunity Area Planning Framework for the area is welcome and keenly anticipated.
Introduction	12	Meeting: ECEN 26.07.07		Questions were asked about whether building would be allowed on the Chase Farm Hospital site, as this is in the Heart of Enfield.

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Residential Character, Urban Design and the Public Realm	13	Mr Alan Melhuish	Advocate	Apart from developments in high value parts of the borough, the architectural quality of building are nothing special. Building to three or four storeys in housing has been detrimental in many areas where the predominant building height is two storeys. Urban design is equally not been properly assessed such that the character of neighbourhood areas has generally altered and degraded. Much praise is given to the standard of housing and neighbourhoods in the Heart of Enfield but no policy is given over ways those standards should be being applied to Eastern Enfield or new developments but should be.
Residential Character, Urban Design and the Public Realm	13	Mr Alan Melhuish	Advocate	Present commercial and residential developments seem to have no economic perspective influencing their design other than cheapness, which usually is not even cheerful. A greater balance between functional space and layout needs to be considered as all too often affordability is interpreted as low standards. These low standards flow over into housing for sale and so blight neighbourhoods in which they are built.
	Strategic Objectives	Mr Tony Watts	ECEN Representative Over 50s Forum	
Urban Design	13.2	Dr Chris Jephcott	President The Enfield Society	13.2.1/2. It is an unfortunate fact that, although the Borough retains many good buildings predating the 1930s, the architectural quality of most new development since then has been almost uniformly poor or at best mediocre. Hence the importance to the sentiments in 13.2.1.
Urban Design	13.2	Mr Matthew Roe (CgMs)	Senior Associate Director Metropolitan Police Authority	The MPA are mindful that Central Government policy in PPS1 states development plan policies should seek the erection of safe and accessible environments where crime and fear of crime does not undermine quality of life or community cohesion. Paragraph 13.2.3 encourages development proposals to take into account urban design principles which help to reduce crime. The MPA support the inclusion of a specific planning policy within the LDF which addresses design issues associated with reducing crime. The MPA request that the Council's urban design policies recognise the need for design to reduce crime and the fear of crime, and encourage developers to incorporate Secured By Design principles from the conception of development schemes. Regard should also be had to the guidance provided by the ODPM publication Safer Places. It is considered that paragraph 13.2.3 should make more specific reference to Secured By Design requirements and the principles of Safer Places.
Urban Design	13.2	Mr Graham Saunders	Senior Regional Planning Advisor English Heritage - London Region	We welcome the reference made to EH/CABE's Guidance on Tall Buildings. As you maybe aware a revised consultation version was published in January 2007. As advised in the revised document, a development plan-led approach to tall buildings has many advantages and one which we would encourage. However, in order for this to be effective we believe that a robust contextual study needs to be undertaken in order to identify possible opportunities for tall buildings and areas where they would not be appropriate. A key component of this study is to understand the historic context through the use of characterisation methods of the wider area.
Urban Design	13.2	Chief Inspector Stuart	Police Partnerships Metropolitan	I note the para on designing out crime and support its content. Please check the figures with your CSU as I think it should read 7th safest borough in 2004/5. There is an opportunity here to say that planning applications for new businesses will be looked at robustly for efforts to design out crime.

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		Palmer	Police	
Urban Design	13.2	Ms Anna Chapman	Planner British Waterways- London Region	13.2.3 Designing Out Crime (page 58): In designing out crime for waterside sites reference should be made to Under Lock and Quay- Reducing Criminal Opportunity by Design published in 2000 by British Waterways in partnership with the London Metropolitan Police. http://www.britishwaterways.co.uk/images/bwl_14_UnderLockQuay_tcm6-105772.pdf 13.2.4: Whilst BW have no objection to tall buildings at key nodes, especially where they enable a staggering and relief between building heights to prevent a continuous block of development along the waterfront. However, stretches of poorly spaced tall waterside buildings close to the water's edge can create a canyoning effect, which encloses the canal and reduces the amount of natural daylight and sunlight to the detriment of wildlife habitats, moorings, security, and visual amenity.
The Public Realm	13.3	Mr Graham Saunders	Senior Regional Planning Advisor English Heritage - London Region	We welcome the inclusion of the Edmonton HERS as a good example where understanding and valuing the historic environment has resulted in a successful heritage-led regeneration programme. In other relevant areas we would encourage a similar approach as a basis in which to help stimulate economic, social and environmental regeneration and positive change of the public realm. Further advice can be found in our publications Regeneration and the Historic Environment (2005) and Streets for All (2000).
The Public Realm	13.3	Ms Anna Chapman	Planner British Waterways- London Region	The public realm also includes the towpath of the River Lee Navigation.
	Question 40	Mr Tony Watts	ECEN Representative Over 50s Forum	Support option1
	Question 40	Dr Chris Jephcott	President The Enfield Society	2. But still need to have due regard to character of area.
	Question 40	Mr Chris Evans	None	Support option 1. If the character of the area is to be maintained then any new development needs to be carefully considered to make sure that it fits in with valuable existing features and does not erode the character of the area. I live in Palmers Green and often travel up to Southgate, Areas like Southgate Green and the Bourne still retain a semi-rural feel from when this area was not part of London. It is very important that this should, if possible, be retained. I think this character of the area will come under increasing pressure with the need for more homes in the London area and I am not saying that extra accommodation should not be built. However, this needs to be done with care and sensitivity so as to preserve as far as possible the current character of the area. Similarly, the Council should ensure that open areas like the allotments to the north of Southgate town are not simply built over, but are retained as far as possible.
	Question 40	Mr Andrew Newman	Forty Hill and Bulls Cross Study Group	-1

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	Question 40	Mr James Finn (Barton Willmore Planning)	Planner St James Developments Ltd	Our client supports Option 2 as it would ensure that Enfield would best be able to meet and exceed the housing targets set for the Borough as stated in the published Early Alterations in Policy 3A.2 Borough Housing Targets and Table 3A.1 Housing Provision.
	Question 40	Ms Barbara Aldridge	Chairman Enfield Lock Conservation Group	New developments in all areas should be considered individually, as design, height and visual impact will depend on area and use.
	Question 40	Mr Giles Dolphin	Planning Decisions Manager Greater London Authority	The London Plan promotes a sustainability led approach to this issue. London Plan Policy 4B.1 establishes design principles for developments which include, amongst others, maximising the potential of sites and ensuring that development respects local context, character and communities. Proposals for the intensification of existing residential areas should be objectively evaluated against clear criteria on a case-by-case basis.
	Question 40	Ms Jill McGregor (GL Hearn)	Tesco Stores Ltd	Option 2
	Question 40	Amit Malhotra (RPS Planning)	Senior Planner Fairview New Homes Limited	Fairview would encourage the intensification of residential areas. It would also support sites such as St Anne's and the former playing field at Cherry Blossom close. Both areas are surrounded by residential uses and therefore would be suited to this form of development.
	Question 40	Gary Thomas (Planning Works Ltd)	Lionsgate Properties	A combination of both approaches.
	Question 41	Mr Tony Watts	ECEN Representative Over 50s Forum	Any building greater than 4 floors i.e Where a lift is required
	Question 41	Dr Chris Jephcott	President The Enfield Society	Five storeys or more. This should include mansard top floors and semi-basements.
	Question 41	Mr Alan Melhuish	Advocate	On tall buildings, anything 4 storeys or over should be ranked as a tall building. Heights of buildings are not usually the sole criteria. Volume of development can blight areas like the Iceland distribution warehouse in Innova Park. In considering tallness, anything that overshadows church towers and spires would be retrograde. Likewise external physical appearance of a repetitively uniform elevation can give adverse impacts on the character of neighbourhoods.
	Question 41	Mr Andrew Newman	Forty Hill and Bulls Cross Study Group	Max 4 storeys

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	Question 41	Mr James Finn (Barton Willmore Planning)	Planner St James Developments Ltd	Our client considers that for built up areas in Enfield such as Town Centre locations, a tall building could be considered as a building of 12 -15 storeys in height and, elsewhere in the Borough, a building of 5-6 storeys in height.
	Question 41	Ms Barbara Aldridge	Chairman Enfield Lock Conservation Group	New developments in all areas should be considered individually, as design, height and visual impact will depend on area and use.
	Question 41	Mr Giles Dolphin	Planning Decisions Manager Greater London Authority	The definition of a tall building adopted in the new plan should reflect the London Plan and the guidance on this issue provided by the Commission for Architecture and the Built Environment and English Heritage. The London Plan policies apply to all buildings that are significantly taller than their surroundings and/or have a significant impact on the skyline and are larger than the threshold sizes set for the referral of planning applications. The new plan should establish locally based thresholds and/or a definition, such as that above, of what constitutes a tall building rather than setting a blanket threshold for the whole borough.
	Question 41	Gary Thomas (Planning Works Ltd)	Lionsgate Properties	30 metres in line with existing legislation.
	Question 42	Mr Tony Watts	ECEN Representative Over 50s Forum	Support Option 2
	Question 42	Dr Chris Jephcott	President The Enfield Society	In siting of tall buildings the evaluation should above all consider how they intrude in views, particularly historic townscapes or landscapes and whether they compromise their essential character. As an example, seek to avoid an effect like Enfield Civic Centre seen from the Market Place, looming over the tower of St Andrew's Parish Church. The effect of the change of scale on the immediate surroundings should also be considered. A tall building can be dramatic and inspiring (only local examples I can think of are church spires) if well designed and in the right place.
	Question 42	Mr Andrew Newman	Forty Hill and Bulls Cross Study Group	(1) and case by case
	Question 42	Mr James Finn (Barton Willmore Planning)	Planner St James Developments Ltd	Our client supports Option 2; all applications should be considered on a case by case basis.
	Question 42	Ms Barbara Aldridge	Chairman Enfield Lock Conservation	New developments in all areas should be considered individually, as design, height and visual impact will depend on area and use.

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	Question 42	Mr Giles Dolphin	Planning Decisions Manager Greater London Authority	In general conformity with the London Plan the new Plan should ensure that all applications for tall buildings are considered against Policies 4B.1, 4B.3, 4B.8, and 4B.9 of the London Plan as well as all others relevant to the application. In line with London Plan Policy 4B.8 the Council may wish to identify defined areas of specific character that could be sensitive to tall buildings within the new Plan. In doing so, the Council should clearly explain what aspects of local character could be affected and why. The new Plan should not impose unsubstantiated borough-wide height restrictions.
	Question 42	Ms Jill McGregor (GL Hearn)	Tesco Stores Ltd	Option 2
	Question 42	Gary Thomas (Planning Works Ltd)	Lionsgate Properties	Option 2.
	Question 43	Mr Alan Melhuish	Advocate	A viable way to improving the public realm is to mitigate the impact of hard landscaping by the provision of trees, shrubs and soft landscaping with associated public seating. Going further , improvements which put sustainable matters to the fore rather than continually pandering to the car has to be the future.
	Question 43	Dr Chris Jephcott	President The Enfield Society	Identify redundant clutter and take an overall view. Remember a plethora of signs merely causes confusion. Joined up thinking between Council departments.
	Question 43	Mr Andrew Newman	Forty Hill and Bulls Cross Study Group	Safety, local character and a unified approach.
	Question 43	Dr Chris Jephcott	President The Enfield Society	Identify redundant clutter. Remember a plethora of signs merely cause confusion. Joined up thinking between Council departments.
	Question 43	Ms Barbara Aldridge	Chairman Enfield Lock Conservation Group	The public realm - In all areas of the borough the visual impact of street furniture and clutter should be considered in order to improve and enhance the borough. Planning should aim to improve the street scene, for both visual impact and safety to pedestrians and drivers. Small open green spaces, grass, shrubbery, verge or garden, within highly developed areas are also important and should be identified and kept free of development and street clutter.
	Question 43	Mr Giles Dolphin	Planning Decisions Manager Greater London Authority	London plan Policy 4B.4, and other relevant policies, should be considered in developing policies to improve the public realm in the new Plan.

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	Question 43	Gary Thomas (Planning Works Ltd)	Lionsgate Properties	An overall concept for the function of the spaces that are being improved.
	Question 44	Mr Tony Watts	ECEN Representative Over 50s Forum	Agree
	Question 44	Dr Chris Jephcott	President The Enfield Society	Yes. The HERS has been very successful.
	Question 44	Mr Andrew Newman	Forty Hill and Bulls Cross Study Group	Yes
	Question 44	Mr Tony Watts	ECEN Representative Over 50s Forum	Seek powers to enforce clearance of rubbish in 48 hours for residential and business premises
	Question 44	Dr Chris Jephcott	President The Enfield Society	Yes. The HERS has been very successful
Conservation	14	Mr Graham Saunders	Senior Regional Planning Advisor English Heritage - London Region	Why is the heritage section placed in Section 4, Heart of Enfield? We would suggest that heritage issues are relevant to all land uses throughout the whole of the Borough not to one part or certain land uses as implied at present. Issues relating to housing, transport, employment and community facilities may have for example implications upon a range of heritage assets and/or their settings. In addition heritage issues and the wider historic environment are a key component that helps define the distinctiveness of the Borough, whether this relates to town centre locations, suburbia, urban fringe or rural areas. These policies need to be overarching and relevant to the whole of the Borough. We support the intention of the emerging core strategy to preserve and enhance listed buildings and conservation areas. However we would advocate that a core strategy spatial policy relating to heritage issues, across the whole Borough, should contain the following components; Preserve, enhance and manage the character and appearance of, archaeological sites, historic buildings, conservation areas, historic parks and gardens, battlefields and other architectural and historically important features and areas, and their settings. Protect, enhance and manage the character and appearance of the landscape and townscape, maintaining and strengthening local distinctiveness and sense of place. Identify, assess and incorporate the physical, social, economic and environmental value of the historic environment in the regeneration of the (Borough). Improve and broaden access to, and understanding of, local heritage, historic sites, areas and buildings • Protect, manage and, where necessary, improve local environmental quality. To achieve high quality and sustainable design for buildings, spaces and the public realm sensitive to the locality. It is noted that within this section very little reference is made to Registered Parks and Gardens, These protected landscapes are a key component of the historic environment and care should be taken to ensure that due consideration is given to this heritage asset within this important policy

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	Strategic Objectives	Mr Tony Watts	ECEN Representative Over 50s Forum	Agree
Conservation Areas	14.1	Ms Claire Martin	Policy Officer Lee Valley Regional Park Authority	Conservation Areas. The Authority supports the Council's objective to protect archaeological sites, scheduled ancient monuments, listed buildings and Conservation Areas. This would benefit the two Conservation Areas; Enfield Lock and Ponders End Flour Mills which are within the Park and the historic value of the waterways.
Tree Protection	14.3	Mr Alan Melhuish	Advocate	Trees are a quality of life benefit to which large parts of the borough owe its character. Trees soften the harsh aspects of hard landscape , but also provide shading on hot days to combat the problem of heat sinks associated with hard paved areas. Trees are the distinctive feature of the Heart of Enfield and the Open Green Spaces across the borough.
Tree Protection	14.3	Mr Diane Millis	Regional Policy Officer The Woodland Trust	The Trust also very much supports section 14.3 Tree Protection but believes that it should be extended to include greater protection for ancient trees and therefore fall in line with PPS9 which states Aged or 'veteran' trees found outside ancient woodland are also particularly valuable for biodiversity and their loss should be avoided. Planning authorities should encourage the conservation of such trees as part of development proposals. (ODPM, PPS9, 2005, paragraph 10).
Archaeology and Ancient Monuments	14.4	Mr Graham Saunders	Senior Regional Planning Advisor English Heritage - London Region	The approach set out in the section relating to Archaeology and Ancient Monuments is welcomed but we would suggest that archaeological excavation should be recorded, disseminated and archived. In addition a map of the location and extent of the Archaeological Priority Areas would be useful.
Your Views	14.5	Mr Alexander		The Council should maintain its list of buildings of distinction and publish policies with regard to them (a) Try to get every tree that's felled replaced by a tree as near as possible to the same position (b) Identify areas for more trees and preferred types of pollution reducing trees

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Your Views	14.5	Mr Stacey	Secretary Bush Hill Park Conservation Area Study Group	I am surprised at the paucity of "Your Views" required There has been a lot of activity, recently, from Enfield regarding conservation areas. I refer to character appraisals for all C.A's, article 4 directions flowing from the same and the subsequent, overall management plan. Is it correct to assume Enfield does not need to consult widely as the path is already established for Conservation? There follows the (more detailed) points that should be added to Your Views. Should:- a) Enfield actively seek to identify and adopt new conservation areas? b) Enfield seek to restrict front garden parking, which is seen as generally detrimental to the character etc? c) A restriction be placed on the width of crossover (they come in varying widths; the biggest encompasses a standard width garden? (loss of front garden & kerb parking). d) Enfield have greater powers to intervene where planning law is being flouted? e) Detailed design guides be established for housing, commercial buildings including shopfronts and ancillary structures?
	Question 45	Dr Chris Jephcott	President The Enfield Society	Yes, this is something we have felt the need for a long time.
	Question 45	Mr Andrew Newman	Forty Hill and Bulls Cross Study Group	Yes
	Question 45	Mr Hammett	Environment and Landuse Advisor National Farmers Union	Farmers play a key role in the preservation and appearance of the countryside. Sites outside designated areas make an important contribution to the biodiversity and landscape value of the countryside. The Council should differentiate between the protection status and management requirements of internationally designated sites and sites of local importance. There is already a plethora of conservation and landscape designations and we would object to a further designation for Areas of Distinctive Quality without further consultation on the detailed proposals.
	Question 45	Mr Stacey	Secretary Bush Hill Park Conservation Area Study Group	This was an issue that was turned down by CAG (& Enfield) a long time ago. Rejection (then) was on the basis of lack of resources and the danger that they would be seen as a watered down conservation area (to the detriment of the latter). Nothing has changed in my view.
	Question 45	Dr Chris Jephcott	President The Enfield Society	Yes, this is something we have felt the need for a long time.
	Question 45	Ms Barbara Aldridge	Chairman Enfield Lock Conservation Group	There are many buildings and areas of quality and interest outside conservation areas, these should be identified in some way in order to preserve their appeal.
	Question 45	Mr Graham Saunders	Senior Regional Planning Advisor English Heritage - London Region	As with the local list, there are also many areas of the Borough, that are distinctive in character yet not suitable for designation as conservation areas. Recognising these areas for their townscape quality can help provide a framework in which to manage future change in a sensitive manner. However, in order to provide a sufficiently robust framework, detailed analysis of the area, its component parts and its surroundings, as apart of a Borough wider characterisation programme, should be undertaken.

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	Question 46	Mr Alan Melhuish	Advocate	Buildings of Local Interest : More consideration to the preservation of the borough's industrial heritage and past should be made. That part influenced the nature and variety of house type and built environment of the borough as the work people did affected outlooks and economic status.
	Question 46	Dr Chris Jephcott	President The Enfield Society	Yes, retain the local list. Under the Heritage White Paper, locally listed buildings may be come protected against demolition. Consequently the Plan should include policies to protect buildings of local architectural or historic interest.
	Question 46	Dr Frederic Clark	Hon. Secretary Trent Park Conservation Areas Advisory Committee	The Council should maintain its list of buildings of distinction and publish policies with regard to them
	Question 46	Mr Andrew Newman	Forty Hill and Bulls Cross Study Group	Yes
	Question 46	Mr Stacey	Secretary Bush Hill Park Conservation Area Study Group	Enfield must maintain the list and have the powers to defend it.
	Question 46	Dr Chris Jephcott	President The Enfield Society	Yes. Forthcoming heritage legislation may well give councils power to control the demolition of locally listed buildings, which would then give the designation real value.
	Question 46	Ms Barbara Aldridge	Chairman Enfield Lock Conservation Group	There are many buildings and areas of quality and interest outside conservation areas, these should be identified in some way in order to preserve their appeal.
	Question 46	Mr Graham Saunders	Senior Regional Planning Advisor English Heritage - London Region	We would encourage you to retain the Enfield's local list, as there are many buildings within the Borough that may not meeting the criteria for statutory listing, but due to their historic and architectural value to the local community, should be given a degree of recognition.
	Question 47	Dr Chris Jephcott	President The Enfield Society	Yes, certainly.
	Question 47	Mr Andrew Newman	Forty Hill and Bulls Cross Study Group	Yes
	Question 47	Mr Stacey	Secretary Bush Hill Park Conservation Area Study	I thought that was already a "given" in the UDP; if not; yes.

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	Question 47	Ms Barbara Aldridge	Chairman Enfield Lock Conservation Group	The character and appearance of Conservation areas should retained and enhanced as per the Conservation Area Character Appraisals and Management Proposals.
	Question 47	Mr Graham Saunders	Senior Regional Planning Advisor English Heritage - London Region	It is the duty of the local planning authority to formulate and publish proposals for the preservation and enhancement of conservation areas. PPG15 states that the Plan should provide a Policy framework making clear how detailed assessment documents and statements of proposals for particular Conservation Areas relate to the plan and the weight to be given to them in making decisions (para 2.9). We would therefore urge you to include policies that seek to preserve and enhance the character and appearance of the Borough's conservation areas. An example policy could state; The preservation or enhancement of the special character or appearance of the authority's conservation areas and their settings will be secured by: A programme of Conservation Area Appraisals and management plans and enhancement schemes to manage change; and A presumption in favour of the preservation of buildings and structures, both listed and unlisted, identified as making a positive contribution to the special character or appearance of that conservation area; and Ensuring that development within or which would affect the setting of a conservation area will not have an adverse impact on its special character or appearance; and Safeguarding spaces, street patterns, views, vistas, uses and trees which contribute to the special character or appearance of that conservation area.
	Question 47	Mr Giles Dolphin	Planning Decisions Manager Greater London Authority	The designation, preservation and enhancement of conservation areas is supported by London Plan Policy 4C.11. London Plan Policies 4B.10, 4B.11 and 4B.12 support heritage conservation via a range of means.
	Question 48	Dr Chris Jephcott	President The Enfield Society	The current situation with regard to the treatment and protection of trees in the Borough is far from satisfactory, in particular as regards highway trees. We consider a review of the whole subject is needed, starting with consultation and looking at highway trees, those in conservation areas and in private hands and those in green spaces and the countryside, so as to produce a set of enlightened policies..
	Question 48	Dr Frederic Clark	Hon. Secretary Trent Park Conservation Areas Advisory Committee	(a) Try to get every tree that's felled replaced, as nearly as possible by a tree near the same location (b) Identify areas for more trees and preferred types of tree
	Question 48	Mr Andrew Newman	Forty Hill and Bulls Cross Study Group	Maintain and replace (where lost) existing. Look to enhance areas with new tree planting.

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	Question 48	Mr Stacey	Secretary Bush Hill Park Conservation Area Study Group	For trees in the public domain (street trees) establish area policies (BHP is quite different from say Enfield Town) after consultation with stakeholders' particularly conservation groups. For trees in private domain the existing TPO/CA protection should continue. Verges to be recognised and included in the area policies.
	Question 48	Mr Donald Alexander	Hon Secretary Chalk Lane Area Residents' Association	(a) Try to get every tree that's felled replaced, as nearly as possible by a tree near the same location. (b) Identify areas for more trees and preferred types of tree.
	Question 48	Dr Chris Jephcott	President The Enfield Society	We have many concerns about the whole treatment of trees within the Borough at present. We consider a complete review of the whole subject is needed, from street trees to those in private hands, in green spaces and the countryside. Involving public consultation, hopefully the outcome would be a series of enlightened policies for dealing with this precious asset.
	Question 48	Ms Barbara Aldridge	Chairman Enfield Lock Conservation Group	There is a need for greater protection for trees both within and outside Conservation areas. Trees give character to an area and to particular sites - they should be conserved and new developments should be built around existing trees.
Town Centres and Retailing	15	Mr Alan Melhuish	Advocate	Town Centres should be considered as an integrated whole rather than piecemeal . Piecemeal development has given town centres a fragmented layout and distribution of employment and cultural provisions that detracts from the cohesive functionality. A more integrated study needs to be undertaken to include buildings which should be redeveloped within a comprehensive design statement if future needs and changes are to be met. Before considering whether new retail space should be provided , an integrated transport policy needs to be worked out if the existing roads congestion around the town is not to worsen or parking to be in short supply. Managing change in town centres requires a better understanding of shopping trends. Present provision of financial services and estate agencies adversely affects the variety of shopping experience to be had. Some how , scope to allow larger , deeper units to meet emerging demands of retailers needs consideration as does the craft and home produced foods in small courtyard units As for entertainment - no mention has been made of cultural provisions like live music - concerts, recitals or theatre, rehearsal studios and creative workshops with their employment and educational training perspectives.
Town Centres and Retailing	15	Mr Matthew Roe (CgMs)	Senior Associate Director Metropolitan Police Authority	A key part of the MPA's estate review is to introduce police shops into locations with good accessibility. The purpose of police shops is to provide direct public interface facilities with the police. The Borough's town centres are ideally located to accommodate these facilities. Therefore the MPA recommend the Council's policies allow the introduction of police shops in the main shopping frontages of the town centres. In addition, the MPA are in the process of introducing Safer Neighbourhood Teams into every ward across the Borough. These teams require office accommodation from which police officers can patrol local areas on bike or foot. Such office accommodation could be sited in local shopping centres and parades either in isolation or with police shops. The MPA request the Council's policies recognise the potential need for the

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				introduction of these police facilities with the local shopping centres and parades.
Town Centres and Retailing	15	Mr Graham Saunders	Senior Regional Planning Advisor English Heritage - London Region	The Borough contains a range of historic centres that are subject to change. English Heritages publication Retail Development in Historic Areas (2005) provides advice on how future retail developments can be accommodated sensitively within historic town centres. As discussed in our response to the Enfield Town Centre AAP, we believe that it is important that proposals for change within any of the Boroughs town centres should be based upon a high-quality, design-led response to the existing urban fabric, that is underpinned by a thorough understanding and appreciation of the historic evolution and significance of the urban environment. This contextual approach is essential in order to ensure that future changes respond positively to the character and distinctiveness of each of the Borough's centres.
Town Centres and Retailing	15	Kate Tinsley (Peacock and Smith)	WM. Morrison Supermarkets PLC	Chapter 15 also highlights the Boroughs main town / district centres and also identifies the four major retail parks. Whilst it is recognised that a new proposals map will be produced as part of the emerging LDF at a later date, our clients would request that the Council clearly identify / allocate (and show on the new proposals map) the existing Morrisons stores as follows: 1) Southbury Road, Enfield, EN1 1TW within a designated retail park and identified as a suitable destination for additional retail floorspace, should the need be identified and if there were no other sequentially preferable sites available. 2) Aldermans Hill, Palmers Green, N13 4YD Palmers Green centre boundary be extended to include the Morrisons store.
Town Centres and Retailing	15	Mr Mark Sanger	Community Safety Manager Enfield Council	In Chapter 15 Town Centres and Retailing I am pleased to note reference to the council's Licensing Policy that effectively applies controls on the development of the night-time economy.
Introduction	15.1	Mr Donald Alexander	Hon Secretary Chalk Lane Area Residents' Association	15.1.1(19) The Objective of strengthening town centres should not be to the detriment of local shopping areas such as Cockfosters, nor lead to more traffic congestion
Introduction	15.1	Mr Alexander		15.1.1(19): The Objective of strengthening town centres should be subject to (a) not inflicting significant damage to shopping centres such as Oakwood and Cockfosters, (b) not increasing traffic congestion in the town centres and (c) not further impeding traffic flow on the main east-west and north-south through traffic routes

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Introduction	15.1	Mr Tahsin Ibrahim	Manager Enfield Business & Retailers Association	To state that the Borough has only 5 main town centres is unfair. We feel, in addition to Enfield Town, Edmonton Green, Angel Edmonton, Palmers Green and Southgate, other 5 districts centres; Cockfosters, Oakwood, Winchmore Hill, Ponders End, Enfield Highway and Enfield Wash should be on the map in addition to local centres and parades and several retail parks.
Introduction	15.1	Kate Tinsley (Peacock and Smith)	WM. Morrison Supermarkets PLC	We note that strategic objective for town centres and retailing is (inter alia) to enhance and strengthen Enfield's town centres to meet the needs of the community (Chapter 15 page37), which our clients support.
	Strategic Objectives	Standard Life Investments Ltd	Standard Life Investments Ltd	This objective is supported as it recognises that the town centre should be strengthened in order to meet the needs of various groups. It also recognises the need to support the growth of other (non-retail) uses such as services. Non-A1 retail uses play an important role in ensuring town centre vitality and viability and will continue to do so as part of the strengthening of the town centre.
	Strategic Objectives	Mr Craig Taylor	Enfield Town Centre Manager Enfield Business & Retailers Association	Major town centres should support the needs of the community for leisure and recreational activities as well as meeting their comparative and convenience shopping needs. The reliance on using different centres for different shopping or leisure activities should be avoided to ensure that all sectors of the community are fully served by all centres. The developments at Edmonton Green strive for this whereas those at Enfield Town have so far born fruit only for the comparative shopper.
	Strategic Objectives	Mr Tony Watts	ECEN Representative Over 50s Forum	
Town Centre Uses - Demand and Capacity	15.2	Standard Life Investments Ltd	Standard Life Investments Ltd	Paragraph 15.2.2 refers to 'other Class A1 uses' as including bars, restaurants and cafes. This is incorrect: such uses fall within classes A3 (cafe and restaurants) and A4 (bars).
Town Centre Uses - Demand and Capacity	15.2	Standard Life Investments Ltd	Standard Life Investments Ltd	Paragraph 15.2.3 states that existing vacant premises could absorb about 70% of the projected growth. It must be recognised that existing vacant units may not necessarily be suitable in terms of operator requirements e.g. the unit may be physically constrained, making it unsuitable to the requirements of particular retail operators.
Town Centre Uses - Demand and Capacity	15.2	Sainsbury's Supermarkets Limited	c/o Agent for Sainsbury's Supermarkets Limited	Paragraph 15.2.2 refers to the Council's retail study, entitled A Study of Town Centres, published in 2007, which concludes that there is limited potential demand for convenience goods floorspace within the Borough up to 2013, and no need for new food stores for the foreseeable future. PPS6 does not required proposals for retail development in town centres to demonstrate need. There should therefore be an acknowledgement that increased convenience floorspace within existing centres will be encouraged to support their vitality and viability.

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Town Centre Uses - Demand and Capacity	15.2	Standard Life Investments Ltd		Since the town centres will not be able to accommodate all the growth predicted for the Borough, the Council should not rule out development in the existing retail parks. There is clear demand for additional comparison retailing and it is likely that a proportion of this will be required as retail warehousing that could not be accommodated in the town centres either due to transport constraints or constraints regarding the size of the units that could be accommodated in the centre. While retail warehousing's share of expenditure is slightly higher than the national average there could still be demand for such developments in Enfield that would not have a detrimental impact on the vitality and viability of the town centres. The LDF should recognise that additional retail floorspace within the existing retail parks could offer a sustainable solution to accommodate some of the additional retail demand that could not be accommodated in the centres.
Town Centre Uses - Demand and Capacity	15.2	Mr Tahsin Ibrahim	Manager Enfield Business & Retailers Association	<p>No doubt there will be an increase in Enfield's population in the next 10 years. There will be a demand for more accommodation and more retail floor space. We are keen that we participate in town centre planning issues. EBRA is a representative Organisation of 10 town centre associations. Each town centre association is formally constitutional and conduct regular meetings to discuss town centre issues. Enfield needs to have attractive town centres with balanced retail outlets and a vibrant local economy. The perception that Enfield is a buoyant economy in a prosperous outer London is a false one. The evidence dispels many myths about economy in Enfield's town centres. The town centres are usually made up of long standing independent or family run retail units requiring modernisation and diversification, with too many firms in stagnant and low grow industries and in competition with out of town shopping centres and ever increasing superstores. We welcome the study as whole as a good way forward for Enfield but special attention and care should be given to planning issues to accommodate a good balance of:</p> <ul style="list-style-type: none"> • Retail and non retail businesses together with living accommodation (Affordable housing) • Parking • Open space and townscape • Transportation • Arts, recreation and tourism • Community services • Activities associated with residential areas • Standards for new residential developments • Controlled day time Evening and Night-time economy • Entertainment and leisure • Hours of use of Food and Drink Establishments.

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Town Centre Uses - Demand and Capacity	15.2	Kate Tinsley (Peacock and Smith)	WM. Morrison Supermarkets PLC	In terms of accommodating future retail growth in the Borough, we would suggest that it is important to direct new retail floorspace for which there is an identified need to sites in accordance with a sequential approach to site selection as set out in PPS6. However, with regard to Enfield Town's role as a Major Centre, we would suggest that it is important that the focus and priority should be on providing additional comparison goods floorspace to meet identified needs and consolidate and enhance the role of the town centre. It may be appropriate to consider encouraging the provision of additional convenience goods floorspace to sites within other centres, such as Palmers Green, or if no sites are available, to sites in accordance with the sequential approach to site selection, including established retail parks in out of centre locations, accessible by a range of modes of transport.
Management of Change in Town Centres	15.3	Standard Life Investments Ltd	Standard Life Investments Ltd	The Plan should include a presumption against the loss of retail units. However, rather than this applying to the 'town centre' as currently proposed, it should apply to the core retail frontage only as this is recognised as the most appropriate location for retail uses whereas other secondary frontages should have a degree of flexibility to permit changes to other uses. The text states that the 65% A1 occupancy has been breached in most of the centres in Enfield. This is not the case in respect of the Palace Gardens Shopping Centre or the Enfield Town Centre Core Retail Frontage. The PGSC has A1 occupancy in excess of 90%, and the figure for the whole CRF is close to 90%. It is agreed that concentrations of non-retail uses within primary shopping centres should be avoided. One way to do this would be to set a threshold (65% A1 occupancy, as previously used, is appropriate) and another control could be to impose a restriction on the number of non-retail uses adjacent to each other: "If development proposals would result in more than 3 non-retail uses adjacent to each other in the CRF, planning permission will not normally be granted".
Management of Change in Town Centres	15.3	Mr Craig Taylor	Enfield Town Centre Manager Enfield Business & Retailers Association	rent control would also support this need to maintain retail use in town centres. Commercial pressures on retail businesses, especially independents, preclude them from competing for prime retail sites, which are consequently being lost to A2 and A3 use.
Entertainment, Leisure and the Evening and Night-time Economy	15.4	Mr Craig Taylor	Enfield Town Centre Manager Enfield Business & Retailers Association	There is no current cinema provision in our town centres. Cinema and other entertainment opportunities should be integrated into the retail and leisure environment of the town centres and not banished to out of town parks.

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Entertainment, Leisure and the Evening and Night-time Economy	15.4	Mr Craig Taylor	Enfield Town Centre Manager Enfield Business & Retailers Association	paragraph 15.4.2 is supported but the provision of bars and restaurants must be proportionate to the provision of entertainments in the town centres.
Entertainment, Leisure and the Evening and Night-time Economy	15.4	Ms Claire Martin	Policy Officer Lee Valley Regional Park Authority	Entertainment and Leisure. The Authority wishes to see the Core Strategy recognise the strategic importance of Pickett's Lock as a key leisure and entertainment node and the potential this offers for further development.
Entertainment, Leisure and the Evening and Night-time Economy	15.4	Chief Inspector Stuart Palmer	Police Partnerships Metropolitan Police	I note the scope for a new small to medium size nightclub. Police would seek to limit the size of any new nightclub due to the disproportionate demand for resources to police it. Any new development must be accompanied by a commitment to long-term commitment to pay special services to police on each occasion the club is open. Clubs with capacity over 200 are impossible to police within existing nighttime resources. The demand on policing disproportionately affects demands for patrol and response to the wider Enfield. I note the support for increase in use of evening and night time economy however this will need to be matched with increases in resources in the licensing teams at both LBE and the police and a need to work with police to adjust demand for police resources from existing daytime and evening peaks to later in the evening and night time.
Your Views	15.5	Mr Donald Alexander	Hon Secretary Chalk Lane Area Residents' Association	Policy on entertainment and leisure activities should take into account parking facilities and the effect on local residents (plus police recommendations)
Your Views	15.5	Mr Alexander		There are traffic and parking limits to how sensible it is to bring more shopping into Enfield Further retail development should be concentrated at the Borough's existing retail parks Policy on entertainment and leisure activities should take into account parking facilities and the effect on local residents (plus police recommendations)
	Question 49	Mr Tony Watts	ECEN Representative Over 50s Forum	Seek to cater for projected demand

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	Question 49	Mr Peter O'Brien	Partnership Manager Learning Skills Council	We are not convinced that the Plan has given adequate consideration to the effects of major retail developments in neighbouring authorities, such as Brent Cross. There is also some capacity for new retail units in Palace Exchange, Palace Gardens and Church Street and we believe that effort should first be put into filling these vacant sites before embarking on further development in Enfield Town. There is also capacity for further development in Edmonton Green, which is relevant to the management of town centres. We believe that additional support could be given to local retail enterprises (that either exist or could be set up) to assist them in being accommodated in prime locations. The Plan could signal an initiative that links up the Council, the LSC, EBRA and Enterprise Enfield to this effect.
	Question 49	Dr Chris Jephcott	President The Enfield Society	Yes, we should attempt to avoid the loss of retail trade to outside centres.
	Question 49	Mr Andrew Newman	Forty Hill and Bulls Cross Study Group	Should take into account the effect of the internet on the high street and the decrease in demand for space needed. Allow to go elsewhere in the short term, concentrate on small high quality, diverse, retail facilities.
	Question 49	Dwyer Asset Management plc	c/o Agent for Dwyer Asset Management plc	The Enfield Plan (Enfield's Choices) - Enfield's Local Development Framework Core Strategy Issues and Options Report - April 2007 Town Centre Uses With regard to the Questions asked in the Town Centres and Retailing Chapter, Dwyer Asset Management plc, as the asset manager for clients that own the BOC Site located on the North Circular Road, Edmonton, has the following response. Question 49 Clearly it would be contrary to PPS6, in terms of meeting sustainability aims, to allow expenditure to go to centres outside the Borough as this would result in unnecessary car journeys for residents of the Borough. It would also mean that residents did not have the same level of convenience to a wide range of shopping facilities as in other Boroughs.
	Question 49	Mr Craig Taylor	Enfield Town Centre Manager Enfield Business & Retailers Association	The demand should be met from within the borough at existing town centres. This will strengthen the retail offer locally, create employment and sustainable communities. The demand should be taken up where possible by converting existing properties back to retail and avoid the dilution of the retail offer with excessive A2 and A3 use. Out of town centres should be avoided as they damage the viability of existing centres and the opportunities for local businesses to flourish.
	Question 49	Dr Chris Jephcott	President The Enfield Society	Yes, we should attempt to avoid the loss of retail trade to outside centres.
	Question 49	Ms Jill McGregor (GL Hearn)	Tesco Stores Ltd	The Plan should seek to provide the projected demand for further retail floorspace within the Borough in order to strengthen and enhance the borough's existing town centres whilst reducing the need for residents to travel outside the borough to meet their consumer demands.
	Question 49	Gary Thomas (Planning Works Ltd)	Lionsgate Properties	Yes.

Document Section	Section Number or Question	Name	Organisation	Response
	Question 50	Mr Tony Watts	ECEN Representative Over 50s Forum	Agree to 1 and 3. There should be limited growth at existing retail parks and access should be improved.
	Question 50	Mr Peter O'Brien	Partnership Manager Learning Skills Council	Our comments in answer to question 49 are also relevant here. We believe that the priority should be to improve the take-up in flagship projects before embarking on further redevelopment. A package that includes the development of a skilled workforce would encourage competitiveness, survival and growth.
	Question 50	Dr Chris Jephcott	President The Enfield Society	1. We accept the area round Enfield Town Station could take some more retail floor space, but are surprised comparable sites could not be identified elsewhere in the Borough.
	Question 50	Dr Chris Jephcott	President The Enfield Society	2. There should be some scope for higher density development, provided it does not harm the existing character. 3. This is a possibility that should be explored further. 4. Acceptable.
	Question 50	Mr Andrew Newman	Forty Hill and Bulls Cross Study Group	Should take into account the effect of the internet on the high street and the decrease in demand for space needed. Allow to go elsewhere in the short term, concentrate on small high quality, diverse, retail facilities. Question the need for additional space.
	Question 50	Shelagh Gray (Tribal MJP)	SERGO (Slough Estates)	Qu 50 - Meeting the need for further retail development and other town centre uses In terms of meeting the need for further retail development in Enfield, the limited growth at one or more of the Borough's existing retail parks is supported, in addition to the enhancement of town and district centres. The enhancement of the Borough's existing retail parks will be complimentary to the overall hierarchy of retailing within the Borough, which, subject to appropriate controls would not prejudice the Borough's town centres.
	Question 50	Standard Life Investments Ltd		While, in the short term, it is likely that the existing town centres (and in particularly Enfield Town) will be able to accommodate the majority of retail growth, it is unlikely that the town centres will be able to accommodate all of this growth. Furthermore, the growth in comparison retailing is likely to require units of a size and type that are not available in the town centres. It is projected that an additional 23,709 sqm net sales floorspace will be required in the Borough by 2017 and that alternatives to town centre locations should be sought. In this relation, it is preferable to maximise the floorspace and units that exist in the existing retail parks rather than create additional units outside these retail parks. In addition, the LDF should recognise that some retail parks are more sustainable than others and are likely to attract a higher percentage of public transport trips than others. For example, Enfield Retail Park / Colosseum Retail Park are highly sustainable, in close proximity to a rail station and served by multiple bus routes. Therefore, any additional retail requirement could be accommodated within these retail parks while still adhering to sustainable patterns of travel. Therefore, it is likely that various options will be required in order to meet the further retail demand and that limited growth at the Borough's retail parks should be one of the options for accommodating this growth.

Document Section	Section Number or Question	Name	Organisation	Response
	Question 50	Mr Craig Taylor	Enfield Town Centre Manager Enfield Business & Retailers Association	Question 50 appears to contain conflicting proposals and should have been presented as four separate questions. 1 support with conditions. Existing provision must be fully let and any development be demand led. 2 support with conditions. increase density by returning existing non retail use occupying retail premises back to retail use. 3 object. this would not seem to be achievable without making unwelcome changes to the local environment and changing the balance of town centre shopping provision across the Borough. This would have implications for transport, parking and residents. 4. object. the ratio is already above average and the environment is not conducive to reducing crime and ASB and improving the local community.
	Question 50	Dr Chris Jephcott	President The Enfield Society	1. We accept area round Enfield Town Station could take more retail floorspace, but are surprised comparable sites could not be identified elsewhere in Borough. 2. There should be some scope for higher density development, provided it does not harm the existing character, 3. This is a possibility that should be explored further. 4. Acceptable.
	Question 50	Mr Patrick Blake	Network Strategy Highways Agency	It is noted that two of the borough's major retail parks, Enfield Retail Park/Colloseum Retail Park and De Mandeville Gate Retail Park, are located on the A10 near Southbury Road. The HA would be particularly concerned if the new Plan promoted additional growth at either of these parks, given their proximity to the Junction 25 of the M25. In practice, the HA would prefer that developments are concentrated in town centres close to existing transport hubs. This approach would provide the greatest potential to meet the objectives of PPG13, and could therefore be expected to minimise the impact on the trunk roads in the district.
	Question 50	Mr Giles Dolphin	Planning Decisions Manager Greater London Authority	London Plan Polices 3D.1 and 3D.2 seek to support the role of town centres and provide a series of requirements relating to the location of new retail provision in response to an identified need. The new Plan should promote the vitality and viability of existing centres through concentrating development in these areas and increasing densities rather than allowing the creation or expansion of retail parks.
	Question 50	Dwyer Asset Management plc	c/o Agent for Dwyer Asset Management plc	Question 50 With regard to meeting the need for further retail development a range of options should be provided. Enfield Town Centre should be the main comparison shopping destination in the Borough, but there will be a requirement to provide additional retail floorspace both in other centres and in the retail parks. There will be retail requirements, for example with the extension of existing stores on retail parks, that cannot be located within town centres. The retail parks in Enfield are recognised as providing an important sector of the overall retail offer of the Borough and they have very good accessibility for the resident population. Paragraph 15.2.7 of the report states, inter alia: - The study concludes the Borough has excellent retail warehouse provision with good access for all its residents The first three options are unlikely to be entirely realistic, as sites need to be brought forward by the market and the latest retail study by Nathaniel Lichfield demonstrates that they are in short supply. Thus there should be a general policy for allocating retail development in town centres along with Option 4 in Question 50, which allows for Limited growth at one or more of the Borough's existing retail parks.

Document Section	Section Number or Question	Name	Organisation	Response
	Question 50	Ms Jill McGregor (GL Hearn)	Tesco Stores Ltd	The Council should consider all the options identified for meeting projected demand for retail development. These options should be ordered in line with the sequential approach identified in PPS6 as follows: 1. Higher density development in existing town centres 2. Concentrated redevelopment at one or more town centres to provide high quality retail development. 3. 10,000 sq ft of additional comparison floorspace concentrated in the area around the Enfield town railway station 4. Limited growth at one or more of the Borough's existing retail parks.
	Question 50	Gary Thomas (Planning Works Ltd)	Lionsgate Properties	Options 1, 2 and 3 preferred providing no conflict with other appropriate uses in these locations.
	Question 51	Mr Tony Watts	ECEN Representative Over 50s Forum	
	Question 51	Dr Chris Jephcott	President The Enfield Society	Agree
	Question 51	Mr Andrew Newman	Forty Hill and Bulls Cross Study Group	Agree
	Question 51	Standard Life Investments Ltd	Standard Life Investments Ltd	Yes: there should be protection against the loss of retail units but, this should not be in the form of a blanket policy, restricting uses to A1 retail only. Rather, in order to ensure ongoing vitality and viability, a degree of flexibility must be exercised in considering proposals for non-A1 uses within the town centres. Sufficient controls can still be put in place e.g. a threshold for A1 occupancy (65% as previously used is appropriate), limits on the number of non-A1 uses permitted in particular areas (no more than 3 non-A1 uses permitted adjacent to each other). The controls should not be overly restrictive. It is accepted that the town centres are the most appropriate locations for future retail development, but policies should recognise the role and function of other appropriate town centre uses and encourage such uses where appropriate if tests concerning the level of A1 occupancy are satisfied.
	Question 51	Mr Craig Taylor	Enfield Town Centre Manager Enfield Business & Retailers Association	Office (finance, property, employment) and bar use of retail premises increases property values and puts the retail environment at risk.
	Question 51	Dr Chris Jephcott	President The Enfield Society	Agree.

Document Section	Section Number or Question	Name	Organisation	Response
	Question 51	Mr Giles Dolphin	Planning Decisions Manager Greater London Authority	Policy 3D.3 of the London Plan states Borough's should work with retailers and others to prevent the loss of retail facilities that provide essential convenience and specialist shopping and to encourage mixed use development. A managed and balanced approach to the loss of shop units should be advocated in the new Plan. This should balance the need to prevent the loss of some retail units with the analogous need to promote a mix of uses and manage the evening and night-time economy.
	Question 51	Ms Jill McGregor (GL Hearn)	Tesco Stores Ltd	The Council should seek to restrict the loss of shops units within designated primary retail frontages.
	Question 51	Gary Thomas (Planning Works Ltd)	Lionsgate Properties	Yes, in appropriate parts of centres.
	Question 52	Mr Tony Watts	ECEN Representative Over 50s Forum	In general there should be a positive approach to encouraging evening and night time economy. Control mechanisms should be enforced. Amusement arcades should be close by 10pm Night clubs only small units should be allowed otherwise it will deflect our local police service from general policing activities and crime prevention. Developments should be encouraged in areas such as Lee Valley.
	Question 52	Rose Freeman	Planning Assistant The Theatres Trust	General - the only mention of cultural facilities in the document is at 15.4.2 and for the purposes of the Core Strategy we would expect there to be policies to promote and protect your existing cultural and leisure facilities. An appropriate policy should also state that the loss of an existing facility will be resisted unless it can be demonstrated that it is no longer required or will be rebuilt elsewhere. Such venues make a major contribution to the vitality of town centres with audiences coming to an event, enlivening the surrounding area in the evening and providing regular custom for local bars and restaurants outside normal working and shopping hours. Theatre buildings can provide a venue for creative and cultural activities. These include not just performances on stage, but foyer music and exhibitions, pre-performance talks and events. A flourishing arts scene gives a sense of local identity and vitality, and entertains and stimulates local residents and businesses. Both participation in a production or attending a performance can promote social inclusion, particularly as theatres seek to broaden their production policies and attract new audiences, targeting young people and ethnic minority groups. Parking - with regard to theatres in general, the economics of theatres are reliant on audiences being able to get to the venue by public transport and by car, being able to park their cars and bikes, and being able to get home safely after a show. Controlled Parking Zones around theatres that extend to 11pm at night have serious implications for their economic viability. We would strongly urge any planning policies concerned with parking provision to consider the presence of theatres in the locality. Theatres are unlike other forms of the night time economy they attract families, young people, disabled patrons, and older people who can be discouraged to attend theatres if the costs of travelling and parking at the theatre make the price tag of the evening out too high. Where restrictive regimes do occur we would urge the planning authority to allow for special conditions that can provide free parking to theatre patrons.

Document Section	Section Number or Question	Name	Organisation	Response
	Question 52	Dr Chris Jephcott	President The Enfield Society	1. In general the Plan should seek to guide the provision of entertainment and leisure facilities and the evening and night time economy in the desired direction - leisure and cultural activities with a wide appeal. Family friendly, space for teenagers to hang out, ten pin bowling alley, possibly more health and fitness facilities, performance and meeting venues. Not in the direction of night clubs, casinos and amusement arcades. 2. The Plan should make full use of changes in Government legislation, such as the new licensing laws. 3. It should resist more amusement arcades and night clubs. The market should determine the number and siting of take-aways, though some specific control of siting might be desirable. 4. Review the hours of parking controls in the area of leisure, evening and night time facilities. New venues would need to provide appropriate parking.
	Question 52	Mr Craig Taylor	Enfield Town Centre Manager Enfield Business & Retailers Association	Having a mixed town centre environment enhances access and trade to both sectors (retail and leisure). Ground floor retail premises should generally not be used for leisure. Shared resources such as public transport links and hubs, road access and car parks makes efficient use of the resources and enhances accessibility to all.
	Question 52	Dr Chris Jephcott	President The Enfield Society	1. In general the Plan should seek to guide the provision of entertainment and leisure facilities and the evening and night time economy in the desired direction - leisure and cultural activities with a wide appeal. Family friendly, space for teenagers to hang out, ten pin bowling alley, possibly more health and fitness facilities, performance and meeting venues. Not in the direction of night clubs, casinos and amusement arcades. 2. The Plan should make full use of changes in Government legislation, such as the new licensing laws. 3. It should resist more amusement arcades and night clubs. The market should determine the number and siting of take-aways, though some specific control of siting might be desirable. 4. Review the hours of parking controls in the area of leisure, evening and night time facilities. New venues would need to provide appropriate parking.
	Question 52	Mr Giles Dolphin	Planning Decisions Manager Greater London Authority	In general conformity with London Plan Policy 3D.4 the new Plan should, where appropriate, support evening and night-time entertainment activities in town centres and where appropriate manage their impact through policies such as Entertainment Management Zones. It should also ensure that a sequential approach is applied to the location of such facilities and that they readily accessible by public transport to all sections of the community. The new plan should also have regard to the recently published Managing the Night Time Economy Best Practice Guidance (March 2007). This promotes a proactive and strategic approach to the management of areas of night-time activity in order to reduce impacts such as anti social behaviour, noise, disturbance and cumulative impacts, and to ensure they are dealt with in an integrated manner. It gives particular emphasis to developing a consistent and complementary approach across a range of policy and implementation areas and aims to maximise the positive benefits of a diverse night-time economy and its contribution to London's status as a world city.
	Question 52	Ms Jill McGregor (GL Hearn)	Tesco Stores Ltd	1. In general - The Council should encourage a range of complementary evening and night time uses, including cultural and leisure facilities in line with the approach put forward in PPS6 and the London Plan. 2. taking into account new control mechanisms available to the council - no comment 3. with regards to amusement arcades, night clubs and takeaways - no comment 4. with regard to car parking provision for leisure, evening and night time activities - Car parking provision for leisure,

Document Section	Section Number or Question	Name	Organisation	Response
				evening and night time activities should accord with the standards set out in Annex 4 of the London Plan.
Enfield Strategic Partnership's Sustainable Community Strategy	Appendix 1	Dr Frederic Clark	Hon. Secretary Trent Park Conservation Areas Advisory Committee	ESP didn't consult many voluntary groups (e.g. our Conservation Committee)
Enfield Strategic Partnership's Sustainable Community Strategy	Appendix 1	Mr Donald Alexander	Hon Secretary Chalk Lane Area Residents' Association	Promotion of cycling should be limited. Many roads are not suitable for mixed traffic, and cyclists are nine times more likely to be killed or injured than people in cars, more cycling would increase the number of deaths and injuries
Enfield Strategic Partnership's Sustainable Community Strategy	Appendix 1	Mr Alexander		ESP didn't consult many voluntary groups (e.g. TP Conservation Committee, our Residents Association) What is "a place-shaping approach"? Promotion of cycling should be limited to specific areas. Most roads are not suitable for mixed traffic, and as cyclists are nine times more likely to be killed or injured than people in cars, more cycling would increase the number of road deaths and injuries
Enfield's Spatial Portrait	Appendix 2	Dr Frederic Clark	Hon. Secretary Trent Park Conservation Areas Advisory Committee	Insufficient importance given to the attractions and complexity of Trent Park and its management. An "Area Action Plan" may be needed
Enfield's Spatial Portrait	Appendix 2	Dr Frederic Clark	Hon. Secretary Trent Park Conservation Areas Advisory Committee	Add to "environmental pressures" the need to minimise traffic congestion, and also the need to increase drainage and sewage provision.
Enfield's Spatial Portrait	Appendix 2	Mr Donald Alexander	Hon Secretary Chalk Lane Area Residents' Association	More importance should be given to Trent Park and how it should be managed. Add to environmental pressures - the need to minimise traffic congestion, and the need to increase drainage and sewage provision

Document Section	Section Number or Question	Name	Organisation	Response
Enfield's Spatial Portrait	Appendix 2	Mr Alexander		Insufficient importance is given to the major attractions and complexity of Trent Park and to its management. An "Area Action Plan" or Strategy and Vision Document may be needed Add to environmental pressures, the need to minimise traffic congestion, and the need to increase the drainage and sewage infrastructure
Spatial Planning Framework	Appendix 3	Dr Frederic Clark	Hon. Secretary Trent Park Conservation Areas Advisory Committee	Drainage and sewage capacity in the west of the Borough needs increasing, particularly if more paving over of gardens occurs
Spatial Planning Framework	Appendix 3	Mr Donald Alexander	Hon Secretary Chalk Lane Area Residents' Association	Drainage and sewage capacity in the west of the Borough needs increasing, particularly if more paving over of gardens occurs Only limited cycling ought to be promoted unless we want to increase the number of road casualties Town centre shopping should not be strengthened where it is to the detriment of local shopping and to traffic congestion
Spatial Planning Framework	Appendix 3	Mr Alexander		Drainage and sewage capacity in the west of the Borough needs increasing. This will become even more necessary if more paving over of gardens occurs Only limited cycling ought to be promoted unless we want to increase the number of road casualties Town centre shopping should not be strengthened where it is to the detriment of local shopping areas and/or would noticeably increase traffic congestion
Components of the Local Development Framework	Appendix 5	Dr Frederic Clark	Hon. Secretary Trent Park Conservation Areas Advisory Committee	An Area Action Plan may be needed for Trent Park
Components of the Local Development Framework	Appendix 5	Mr Donald Alexander	Hon Secretary Chalk Lane Area Residents' Association	A Strategic and Management Plan is needed for Trent Park
Components of the Local Development Framework	Appendix 5	Mr Alexander		An Area Action Plan or at least a Strategy and Vision Document plus consequent management Plan is needed for Trent Park

Appendix I – Preferred Options Report: All written representations (in document order)

Document Section	Section Number or Question	Name	Organisation	Response
General comments on document		Mr Mark Hayes	The Chair Enfield Housing Association Forum	CORE POLICY 1 Transport integration is a major challenge for the Borough, with fragmented public transport and poor cross Borough access generally. The Action plan for the Lee Valley will be crucial in supporting this Core Policy, and a fragmented approach to development along this corridor should be resisted.
General comments on document		Mr Norman Smith	Coombehurst Close Residents Association	It contains 160 pages of opaque arguments producing bafflement in this reader. A typical example in 3.1.1 reads: ".....This chapter looks ahead to set out a spatial vision of what Enfield will be like in the future - it proposes a set of strategic objectives for that vision, and a spatial strategy setting out what needs to be done to achieve the vision". "Spatial vision" and "strategy" are used all too frequently, permeating the report. As used, they appear to mean, according to the Glossary, the implementation by other means of planning policies instead of solely by the granting or refusal of planning permission. There is no succinct summary of precisely what is intended. I hope it is not as sinister as it sounds.
General comments on document		Mr Ade Adeshina	Chief Executive O'Bay Community Trust	The third sector acknowledges and appreciates the LEB resources support for Council for Voluntary Services (CVS)(EVA & ECEN Umbrella Groups) but disappointed for the lack of strategic principles and framework including procedures for assistance and acknowledgement for the Front-line organisations, particularly those working the hard to reach members of the London borough of Enfield Communities.
General comments on document		Mr Graham Higgins		Not very informative regarding "Edmonton Green Regeneration" considering the amount of work that has already gone into the programme. I am aware that I can access information on the Enfield Borough website; however very little information provided at the planning desk. Should you have a more detailed update with info since its inception in 1996, together with future proposals in and around the area I would be grateful if you could post it for me.
General comments on document		Mr Chris Baker	Government Office for London	...our first comment is that the Core Strategy is, in general terms, laid out in a coherent form and the vision for Enfield is becoming more evident. In particular, the layout of the document is good in that it is not difficult to follow the train of thought from overall strategy to core policies (but see comments in Annex on Area strategies) take account of national/regional policy and the framework provided by the Community Strategy. An important feature of the Report is that it provides, for most policies, the results of the earlier stage of consultation and the reasoning behind the preferred option(s). However, this is not the case with the overall spatial strategy...
General comments on document		Mr Chris Baker	Government Office for London	We do still have some concerns: first, as we have said before, there appears to be an excessive number of objectives for a core strategy. Many of them are general aspirations conveying a broad utopian vision for the borough and which presumably derive from the Community Strategy. However, for the Core Strategy, they are not as a whole sufficiently focussed on the key spatial changes that will occur in Enfield over the plan period. Instead, they should be based

Document Section	Section Number or Question	Name	Organisation	Response
				<p>on the main local issues to be addressed through the Core Strategy and not on a single approach for the borough as a whole. We appreciate that you are trying to reflect the Community Strategy, which is a much broader document, but this spatial plan needs to be rather more focussed and locally distinctive. We have increasing evidence from the examination of other Core Strategies that PINS are now taking a tough view in terms of plans being genuinely spatial and having a clear, locally distinctive strategy. Second, to some extent, the policies perpetuate the problem identified above with the objectives. As we said in our informal comments, we consider that about one third of them could be described as locally distinctive. In the detailed comments (Annex below) we highlight some examples of non-locally distinctive policies, but the list is not exhaustive. What is important is that they relate to specific projects or changes that are intended to be achieved over the plan period. As part of this, there should be a clear indication that the evidence base has been incorporated into the wording and the policies show that you have a reasonably precise idea of what is to be delivered. For example, Core Policy 26 (Leisure and Culture) includes "encouraging new facilities in areas of deficiency" (bullet 3). This policy would be more locally distinctive if the policy identified the specific areas of Enfield that are deficient in leisure and culture facilities, which is something that should come out of the evidence base. Third, it is also important in terms of soundness that the narrowing of options and evolution of the final plan can be clearly followed by the Inspector. Hence, there is a danger in producing preferred options which cannot be clearly traced back to the original options upon which you consulted as all issues and alternative options should be presented at Issues and Options (Reg 25) stage. There must be evidence that the preferred options are those that logically flow from the results of the earlier consultation. Also, the Sustainability Appraisal must be able to take account of changes and the public consultation at Reg 25 must be seen to have been a genuine exercise, but this is not always clear from the report. Our concern applies most particularly to the spatial strategy itself. For example, in the case of the overall strategy, the three options (minimum, dispersed or focussed growth) were not included in the Issues and Options consultation, which employed the "Triple Arc" concept. Hence, although you have included the public's views (paras 3.3.5 - 3.3.9), it is inevitable that they do not favour one or other option as they were commenting on the Triple Arc approach. Consequently, it is hard to follow the reasoning that leads to the selection of the "focussed growth" option. There is less of a problem in this respect with the individual policies, but you should ensure that there is a logical process in each case. Last, the national and regional guidance contained in PPGs, PPSs, and the London Plan should not be duplicated in plan policies. As we have advised previously, Inspector's expect to see locally distinctive policies that show how the aims of national or regional policy will be delivered locally. Many of the preferred options currently included are, however, largely restatement of higher level policy. This is covered further in the attached Annex. The Report refers to the 2004 version of the London Plan so it will be necessary to revise it in light of the recently republished 2008 consolidated version.</p>

Document Section	Section Number or Question	Name	Organisation	Response
General comments on document		Mr Chris Baker	Government Office for London	<p>Procedural Issues i) The preferred Options Report appears to have been prepared broadly in accordance with the recently revised Local Development Scheme ii) The preferred Options Report appears to have been prepared in line with the provisions of the draft SCI document. It also appears to meet the minimum requirements set out in the 2004 Regulations. iii) The Sustainability Appraisal Report and a list of evidence base documents have been submitted. The SA Report appears satisfactory in terms of the general methodology. However, it does emphasise our concern in the covering letter about how the Council reached the current preferred spatial strategy, as opposed to the earlier "Triple Arc" approach. The Report appears to ignore much of the work that went on before and simply looks at the three options now presented with the most detail on the preferred strategy of "focussed growth". This is something that will need to be considered before you proceed further as it could adversely affect soundness of the final plan. Also, the SA report does not show that the preferred option for the strategy has been fully screened in terms of the Habitats Directive: there is mention of the Directive under the relevant policy area, but no detailed explanation of any screening process having been undertaken. This needs to be remedied before you proceed to a final plan.</p>
General comments on document		Mr Chris Baker	Government Office for London	<p>Coherence, consistency and effectiveness Insofar as it is possible to judge, the Preferred Options Report is consistent with those prepared by neighbouring boroughs (only some of whom have yet reached this stage). However, it is important to make clear that adjoining boroughs have been consulted and that their emerging plans are consistent. Appropriateness of the policies and allocations etc. This is a key issue for soundness and relates to the general comments in the covering letter. The background data on evidence base, sustainability appraisal and consultation suggests a degree of robustness of the policies. However, this is subject to the caveats about the evolution of the spatial strategy, policy repetition and lack of local distinctiveness set out above. The Preferred Options Report provides a reasonably clear mechanism for implementation and monitoring, again subject to the points about implementation set out in the covering letter. This will need to be worked up to a greater level of detail and indicators provided to show how the implementation will be monitored. The Report seems sufficiently flexible to deal with changing circumstances, but this should be kept under review as the final plan is produced.</p>

Document Section	Section Number or Question	Name	Organisation	Response
General comments on document		Ms Karen Foster-	Planning Liaison Officer Environment Agency	At the Core Strategy stage we would expect a series of broad locations to have been considered with the relative flood risk implications of each option being clearly stated. There needs to be a clear indication of the relative flood risks between options. Once identified, the lowest risk broad locations should be tested for suitability against the sustainability appraisal ahead of higher risk (of flooding) 'reasonable alternatives'. By following this process it needs to be clearly demonstrated why your choice of the broad directions of growth has been made, taking into account the known flood risk. In our view the areas identified for development, need to undergo the sequential test/approach on a district wide basis. We appreciate that your Strategic Flood Risk Assessment was being written at the same time as this document and as such has probably not been able to inform the text and policy wordings. However, we think that the flood risk elements of this document could benefit from being rewritten to take on board the recommendations made in your SFRA (which has now been signed off). Your SFRA also includes much background context to flood risk in the Borough which could be used to provide greater and more accurate context to the study area. We would like to see Sections 5 to 8 of your SFRA used to help reword both the flood risk section of this report and to provide more detailed flood risk policy wording which fits in with the requirements of PPS25 and covers all forms of flood risk, not solely river flooding. At present your sections on flood risk are written using PPG25 terminology, we feel that it could be brought up to date with greater cross-reference to the requirements of PPS25. We also feel that in this report there is a lack of consideration of other strategic documents such as the Thames Catchment Flood Management Plan, and the Lee Flood Risk Management strategy. We would like to the key policy messages from the Thames Catchment Flood Management Plan embedded within this document. We would also like to see the areas needed to construct a flood alleviation scheme on the Salmons Brook (Enfield golf course, Montagu Rd, and Eeley estate) safeguarded across all stages of development (e.g. from Master planning through to individual planning application) so that future development does not preclude the ability of the Environment Agency to undertake its proposed flood alleviation scheme. New development will need to be sympathetic to and leave space for these flood alleviation schemes to be undertaken, as they will be affording flood protection to the residents of Enfield. We can work with you to help ensure that this is achieved.
General comments on document		Mr Brian Whiteley	Environmental Services London Borough of Waltham Forest	In broad terms officers here welcome the Core Strategy Preferred Options. At 168 pages in length the Preferred Options document together with the 120-page Sustainability Appraisal Report give a comprehensive account of the background policy framework behind its analysis and proposals. The main body of the report (Chapters 3-10) puts forward a clear spatial vision, strategic objectives and spatial strategy for Enfield together with policies for specific broad themes - housing, economic development, the physical environment and travel – which officers here would broadly support.
General comments on document		Mr Matthew Roe (CgMs)	Senior Associate Director Metropolitan	Having reviewed the Council's Preferred Option Report for the Core Strategy the MPA generally supports the Council's spatial strategy however recommends that the implications for policing are given more prominence. As we explained in our May 2007 representation the provision of effective policing is of crucial importance across London to ensure safe environments are

Document Section	Section Number or Question	Name	Organisation	Response
			Police Authority	created consistent with national planning policy guidance in Planning Policy Statement 1 (PPS1). The recognition of policing as a material consideration in determining planning applications and formulating planning policy is clearly advocated throughout the adopted London Plan (consolidation with alterations since 2004).
General comments on document		Miss Claire Morison	Drivers Jonas	The LFEPA has 111 land fire stations located across Greater London. Three of these are located within the London Borough of Enfield (Enfield) as detailed below: 1. Edmonton: 99 Church Street, N9 9AA 2. Enfield: 93 Carterhatch Lane, EN1 4LA 3. Southgate: 96 High Street, N14 6BN Future growth within Enfield will create additional risks from fire and other emergencies across the Borough. The LFEPA urges the Council to ensure that future policies specifically mention the links between future development proposals and maintaining community safety. Specifically, it asks policies to address the need to grasp opportunities offered by new developments in Enfield to designing out risks from fire, particularly in residential accommodation. This would include giving consideration to installing hardwired smoke alarms and sprinkler systems where the risks justify it. Efforts to try and reduce crime such as arson through good design should also be promoted.
General comments on document		Mr Stephen Conroy	Deputy Chief Executive Enfield Primary Care Trust	We welcome the inclusion of improving the health of Enfield residents as a theme in the Core Strategy. The PCT has had several constructive meetings with Planners and is developing what should be a very effective working relationship to ensure that planned health developments fit well with the Enfield Plan.
General comments on document		Austin Mackie (DTZ Development & Planning)	Director St Modwen	In summary, the main points that St Modwen wish to make relate to the need for greater recognition of the importance and opportunity of Edmonton Green within the overall spatial development strategy: St Modwen welcome the Council's commitment to taking forward their LDF and are keen to see successful progression through the key hurdles. It is becoming clear that procedural matters have a significant impact upon such a process. Sections 2 and 3 of the draft Core Strategy contain a significant amount of contextual information. Whilst we find this helpful, it is our experience that other Core Strategies are being criticised by Inspector's for setting out what are broad aspirations and not focussed spatial objectives, the recent Brent pre-exploratory meeting being a good example. In order to avoid risks in the LDF being delayed for more procedural than policy reasons, we would recommend that the Council have regard to precedent guidance being offered to other Boroughs and also to seek a clear steer from Government Office in terms of what is deemed to be acceptable format and content.

Document Section	Section Number or Question	Name	Organisation	Response
General comments on document		Miss Suzy Wilson	CgMs Consulting	<p>The University is looking at rationalising their estate which could result in the closure of the Trent Park and Cat Hill campuses (site plan attached). These campuses have been identified as no longer providing suitably efficient accommodation to meet their needs. The result of any rationalisation of their estate being to ensure for the future an improved provision of facilities for the University, and higher education in general, within North London. Bringing these sites forward for redevelopment would assist with meeting some of the Core Strategies objectives. The redevelopment of the sites for appropriate uses needs to be recognised within the Local Development Framework. At this stage we request that the sites are taken account of with regard to the Core Strategies objectives with more detailed representations on the type of development suitable for the sites being addressed at the Site Specific DPD stage. The redevelopment of Trent Park could see the demolition of unsightly buildings which currently detract from the objectives of the Green Belt, the conservation area and the setting of the listed buildings. Redevelopment could enable the retention and continued use of the listed buildings, stewardship of the landscape and potentially increased/improved access to the public. Redevelopment of Cat Hill could also enable the removal of unsightly buildings and enable a more efficient use of a brownfield site. We consider that the Cat Hill site is particularly suited to residential development. Due to its existing scale of development and location, a high density development could be achieved at the site. Redvelopments of both sites would meet the requirements of Core Policy 1 in that they are both previously developed sites which have the potential for more efficient use than at present. In the event that the University pursue rationalisation of their estate in this manner, we consider it would be appropriate for the University to collaborate with the Council to work up development briefs for both sites, similar to that completed for the Ponders End site. In consideration of the above, and the size of these sites and the redevelopment potential they hold, we request that the need for development briefs should be identified and included within the Core Strategy.</p>
General comments on document		Steven Mills	Senior Town Planner Network Rail	<p>Our earlier reps on the Enfield Town Centre AAP are also attached for your info - it would be good if the general principles in this letter regarding higher densities, scheme viability and use of S106s for transport improvements etc is incorporated into the Core Strategy as well.</p>

Document Section	Section Number or Question	Name	Organisation	Response
General comments on document		Mr Giles Dolphin	Planning Decisions Manager Greater London Authority	<p>All LDDs must be in general conformity with the London Plan, in accordance with Section 24(1)(b) of the Act. This requirement is also a key test of the soundness of the plan. The Mayor welcomes early engagement with boroughs as LDDs progress through production stages and will formally issue his opinion on general conformity at the submission stage in line with Regulation 30(1) of the Town and Country Planning (Local Development) (England) Regulations 2004 (“the Regulations”) and Section 24(4)(a) of the Act. Regulation 26 of the Regulations requires consultation at the Preferred Options stage of LDD production. The Mayoral representations made to Enfield Council at this stage will not go forward to the Examination. It is envisaged that the Borough Council and GLA officers will meet to take forward the issues raised by the Mayor before the next formal consultation stage, (Submission to the Secretary of State) so that general conformity with the London Plan can be achieved and the DPD is sound before the Examination commences. In a number of places the Core Strategy refers to the proposed Development Management Document, particularly in providing more specific requirements and criteria for consideration of applications. However, the status of this document is unclear. Currently it is proposed to be a supplementary planning document (SPD), although the Core Strategy notes that this is under review and that it may become a development plan document (DPD). The GLA would strongly encourage Enfield to prepare this document as a DPD in order to give the various requirements and criteria significantly more weight than they would otherwise have as SPD. All references in the Core Strategy to the London Plan and the policies, text, and diagrams therein should be updated to reflect the most recent publication, that being ‘The London Plan (Consolidated with Alterations since 2004)</p>
Enfield's Local Development Framework	1.1	Mr Graham Saunders	Senior Regional Planning Advisor English Heritage - London Region	<p>Building upon the comments we provided in our letter dated 15th February 2006 we have the following comments to make on the final SA Report. 2.2 The Enfield Core Strategy We welcome the range of strategic objectives identified and are encouraged by the reference to issues of local distinctiveness, place shaping, and protection and enhancement of the Boroughs environmental quality. The specific objective on the historic environment is especially welcomed, but we would urge you to insert the word ‘enhance’ at the start of the sentence, so that it reads, ‘To protect and enhance the Borough’s conservation areas, listed buildings.....’ 2.3 SA Process 2.3.3 SA Objectives table We welcome the SA objective on the historic environment, but would be concerned that it has been combined with issues relating to green and open spaces. The historic environment must be seen as a separate SA objective; otherwise the assessment of this key issue could be obscured because it has been combined with another sustainability issue. The question posed in the second column does not ask whether the ‘Preferred Option’ would enhance the Borough’s heritage assets and other culturally important features. In addition no reference has been made to the setting of heritage assets and the wider historic environment. The Preferred Option must consider this issue as well as part of the SA process. 12 Cultural Heritage 12.3 Context Review The key messages from PPG15 omits the need for policies to be developed for the preservation and enhancement of the historic environment. As you will be aware a revised version of the London Plan has been issued (February 2008). 12.4 Baseline 12.4.3 – It is not clear on whether conservation area appraisals/management plans have been developed for the Boroughs conservation areas. We would suggest that the status of these</p>

Document Section	Section Number or Question	Name	Organisation	Response
				<p>areas should this highlighted in this baseline information. 12.7 Relevant SA/SEA Objectives The details set out in this chapter very much focus on the historic environment which is welcomed with little or no reference to green and open space issues. However the SA objective considered relevant does not sit comfortably with this chapter because it includes green and open space issues. These issues should be considered in a separate objective possibly under the topic of landscape and townscape. 12.8 Appraisal Findings We support the need of the Preferred Options to encourage owners of historic buildings to make provisions for their maintenance. Mechanisms to reduce the number of listed buildings at risk are very much welcomed regardless of whether they are owned privately or by the Council. 12.10 It should be noted that English Heritage will convert the 'buildings at risk' to 'heritage at risk' which will be launched in early July. 18 Landscape and Townscape We welcome the recognition that the historic environment is a key part of the Borough's landscape and townscape. Linking the two issues is important and encouraging, however we believe that the relevant SA objective should be more explicit and focused on the issue it seeks to cover i.e. townscape and landscape issues. This could be achieved if the historic environment is contained in a separate SA objective. On considering the details of this chapter it appears that it is disproportionately weighted towards landscape issues and very light on townscape issues. It does not appear to consider the diverse townscape environments that exist in the Borough and problems they experience. One of the Core Strategy objectives relates to local distinctiveness and the emergence of strategic areas within the Borough i.e. Enfield Town Centre, along the North Circular, Green Belt edge etc... However the details set out in this chapter do not appear to make this connection successfully.</p>
Enfield's Local Development Framework	1.1	Mr Giles Dolphin	Planning Decisions Manager Greater London Authority	<p>Paragraph 1.1.3 should state that the Core Strategy, together with the other Development Plan Documents in the LDF, and the London Plan will constitute the statutory development plan for Enfield.</p>
Enfield in Context	2	Mr John McGill	Deputy Director North London Strategic Alliance	<p>There appears to be very little reference to other strategic developments located outside of the borough boundaries. We understand that this is in part due to comment provided by the Planning Inspectorate that the Core Strategy should confine itself to matters contained within the borough boundaries. If this understanding is correct, then we would say that the Planning Inspectorate on this occasion is wrong, since Enfield cannot be seen in isolation. As a London borough, albeit one located at the edge of the city, it has key relationships with its neighbouring boroughs and districts outside of London and will no doubt be shaped by significant developments, for example the Olympics and Stratford City to the south, Brent Cross/ Cricklewood to the west, Stansted Airport and the London-Stansted-Cambridge-Peterborough growth corridor to the north. As a general point, the Core Strategy does not appear to pursue an agenda of polycentric growth for London for which the NLSA has lobbied. This clearly relates to the point made above in relation to Enfield's place within London, but it is also a key policy for North London Strategic Alliance in terms of the future growth of the London region. This is an</p>

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				important matter in relation to the role and growth of town centres, as well as in terms of the climate change and environmental protection agenda, since polycentric development of London focussed on the role of the town and urban centres would reduce the need for travel which would be beneficial in terms of lowering the need for car borne journeys and also in reducing the length of the working day for many of Enfield's residents.
Enfield in Context	2	Mr Giles Dolphin	Planning Decisions Manager Greater London Authority	Chapter 2 should, in an appropriate section, state that the Core Strategy, together with the other Development Plan Documents in the LDF, and the London Plan will constitute the statutory development plan for Enfield.
National and regional policy context	2.1	Mr John McGill	Deputy Director North London Strategic Alliance	There does not seem to be any reference to the emerging Opportunity Area Planning Framework for the Upper Lee Valley which will be a key Mayoral document for this part of the borough.
National and regional policy context	2.1	Mr Giles Dolphin	Planning Decisions Manager Greater London Authority	Paragraphs 2.1.2-2.1.4 should be updated to reflect the current London Plan. The strategic precepts in paragraph 2.1.2 should be replaced with the Mayor's six objectives as required by London Plan Policy I.1. The key requirements for Enfield should be updated to reflect all relevant policies of the London Plan, particularly Chapters 2A and 5B. Paragraph 2.1.17 notes that the status of the proposed 'Development Management Document' is subject to review and may change from that of Supplementary Planning Document (SPD) to a Development Plan Document (DPD). This lack of clarity currently results in a confused approach to general conformity throughout the Core Strategy Preferred Options as this extensively and inappropriately relies on the 'Development Management Document' SPD to implement London Plan policies, even where these explicitly place requirements on inclusions within DPD policies. The status of this document should be determined as a matter of urgency as part of the LDS review and the Council should then clearly establish the role of each document, translate London Plan policies into the appropriate document(s), and then consult on both documents simultaneously to enable general conformity to be assessed. The Core Strategy Preferred Options are not in general conformity with the London Plan.

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Local policy context	2.2	Mr Peter O'Brien	Partnership Manager Learning Skills Council	Paragraph 2.2.2 ought to at least include the aim of 'Promoting Positive Futures' (Enfield's Children and Young People's Plan), which is "to deliver excellent services for children and young people, their parents, carers and families". We would have liked to have seen some specific commitments from the Plan about improving the quality of education transferred into the LDF Core Strategy. Paragraph 2.2.5 should include a bullet: 'Promote skills, employment and enterprise as drivers of regeneration and wealth creation'. This is a significant omission Paragraph 2.2.8 could include reference to the following draft strategies: - Enfield Skills and Employment Strategy; - Strategy for Change: building schools for the future in Enfield. Paragraph 2.2.10 should refer to "Regional Commissioning Plan: London North Statement of Need (Learning and Skills Council)"
Local policy context	2.2	Mr Andrzej Warhaftig	Business Manager Enterprise Enfield	2.2.5 should have an overarching objective to enhance the business/enterprise base within the borough
Local policy context	2.2	Mr John McGill	Deputy Director North London Strategic Alliance	[Re 2.2.21] Reference is made to the "new Planning Act". This should provide dates just to ensure that we all know which Act this refers to.
Local policy context	2.2	Mr Patrick Blake	Network Strategy Highways Agency	It is noted that paragraph 2.2.17 of the Preferred Options Report states that consideration is being given to upgrading the status of the Development Management Document from an SPD to a DPD. The HA would be strongly supportive of this approach. It is imperative that a DPD status document is brought forward which ensures that developers control and mitigate the impacts of their developments on the SRN. Inclusion of such policies in a DPD will ensure that they form part of the Statutory Development Plan and therefore have sufficient weight within the Local Development Framework.
Spatial portrait	2.3	Ms Anna Chapman	Planner British Waterways-London Region	2.3.11 Movement. - British Waterways request that reference is made to the role of the River Lee Navigation for passenger and freight transport by water and the use of the canal towpath for walking and cycling in this paragraph.
Spatial portrait	2.3	Ms Anna Chapman	Planner British Waterways-London Region	2.3.16 Given the significance of the River Lee Navigation within the Borough, particularly as a recreation resource, which has the potential to be more valuable the borough's residents British Waterways request that the second sentence of this paragraph is re-worded to include reference to the River Lee Navigation as follows: The Lee Valley Regional Park and River Lee Navigation lie next to ..

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Spatial portrait	2.3	Mr Norman Smith	Coombehurst Close Residents Association	Paragraph 2.3.20 accepts unquestioningly without argument that Enfield's population will inevitably grow, especially in the south and east. Taking this together with the inadequate housing and infrastructure leads to the enormous problems the Borough faces. I don't believe that the consequent pressures should be accepted. If I did, then those who can should move out of the Borough and leave Enfield to its own devices. More hard and fundamental thought is needed on how to tackle and possibly avoid this, rather than using verbiage and buzzwords like "spatial".
Spatial portrait	2.3	Ms Karen Foster-	Planning Liaison Officer Environment Agency	2.3.10 - This section should set the scene with regards to flood risk, and explain that a large proportion of Enfield falls within the floodplain of the River Lee and its tributaries.
Spatial portrait	2.3	Ms Karen Foster-	Planning Liaison Officer Environment Agency	2.3.24 - Please add the following bullet point: · Protect, enhance and restore rivers and their floodplains.
Spatial portrait	2.3	Ms Karen Foster-	Planning Liaison Officer Environment Agency	2.3.25 - The bullet point entitled 'Addressing environmental issues likely to affect Enfield' should also add 'reducing flood risk'. The bullet point entitled 'Protecting, enhancing and improving access to Enfield's green and open area' should also include 'biodiversity'.
Spatial portrait	2.3	Mr Graham Saunders	Senior Regional Planning Advisor English Heritage - London Region	2.3.24 – We would suggest that there is a need to protect and enhance the Borough's historic environment in the face of population and economic growth. 2.3.25 – The historic environment has not been explicitly mentioned as a borough-wide key issue. This is of concern especially in light of the pressure for change expected to take place in the life of the Plan. We would therefore urge you to recognise the value of the historic environment in contributing to the character of the Borough and its sense of place; and that the Borough's heritage assets and the wider historic environment need to be protected and enhanced, as key borough-wide issues.
Spatial portrait	2.3	Mr John McGill	Deputy Director North London Strategic Alliance	Page 9, para 2.3.9. The paragraph which refers to five main town centres should give their designation within the London Plan terminology.
Spatial portrait	2.3	Mr John McGill	Deputy Director North London Strategic Alliance	Within the section "Problems and Challenges", there is no reference to the work produced by Communities and Local Government which is then referenced in the Working Neighbourhoods Framework on the effect of social housing and its links with structural levels of worklessness. Also within this section there should be some reference to the effect of buy to let within the private housing sector and the council should consider whether further work is necessary to understand this market.

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Spatial portrait	2.3	Mr John McGill	Deputy Director North London Strategic Alliance	Page 12, para 2.3.22. This section should also refer to the growth of jobs within the London central activity zone and also should make more specific reference to links with Hertfordshire and Essex in terms of job creation.
The basis for the Spatial Strategy	3.1	Mr Mark Hayes	The Chair Enfield Housing Association Forum	2.3.13 There is evidence that deprivation in some parts of the Borough is increasing. This represents a major challenge that the LDF will need to fully embrace, particularly in relation to levels of worklessness, poor quality housing and transience. 2.3.17 The sustainability of much of the older housing stock in the Borough is a major issue that requires a careful, pro-active policy response
The basis for the Spatial Strategy	3.1	David Phillips (GL Hearn)	Planning Director Hadley Homes	The broad objectives of the Spatial Strategy are supported however we are concerned that these objectives have not been substantiated by a robust and reliable evidence base. The policies and proposals of the Core Strategy must be based on a thorough understanding of the needs of their area and the opportunities and constraints which the Council needs to take into account. Whilst we recognise that the Council intend to undertake additional baseline studies including the preparation of a Strategic Housing Market Demand Assessment we consider, in line with PPS12, that this evidence should be prepared to inform rather than to fit the Core Strategy. On this basis we have the following comments to make. The evidence base referred to in para. 3.1.2 and Appendix 1 is inconsistent with national planning policy, namely the need for a robust evidence base as outlined in PPS12 and particularly in relation to PPS3 and PPG2. Para. 3.1.2 and Appendix 1 is unsound for the following reasons: • The Council has not presented a Strategic Housing Market Assessment in its evidence base and the Core Strategy does not refer to an updated Housing Needs Survey and instead presents analysis in the form of its 2005 Housing Needs Survey. Accordingly the evidence-based approach is inconsistent with national policy, namely the statements set out in PPS3. Paragraph 32 of PPS3 is concerned with assessing an appropriate level of housing and states: "The level of housing provision should be determined taking a strategic, evidence-based approach that takes into account relevant local, sub-regional, regional and national policies and strategies achieved through widespread collaboration with stakeholders". Furthermore, paragraph 33 of PPS3 sets out that in determining local levels of housing provision Local Planning Authorities should present local evidence of need and demand in the form of 'Strategic Housing Market Assessments' which may include other market information such as long-term house prices. It is fundamental that the Council addresses these matters in the Core Strategy. • The Council has not undertaken a review of Green Belt boundaries to identify those sites suitable for release as it acknowledges that it is required to do so by virtue of para. 7.2.4. A strategic Landscape and Visual Impact Assessment of potential locations for release should be conducted, encompassing the Guidelines for Landscape and Visual Impact Assessment. (GLVIA) published by the Landscape Institute and the Institute of Environmental Management and Assessment 2002, and Landscape Character Assessment (LCA). Guidance for England and Scotland, published by the Countryside Agency and Scottish National Heritage 2002. The strategic review should combine

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				<p>information and desktop reviews with on-site surveys and appraisals. The study should provide an assessment of the principal landscape and visual issues, relating to strategic areas and should be based on a combination of site based assessment and information review. The areas should be assessed in terms of landscape character and sensitivity and visual amenity and sensitivity. Particular attention should be paid to the implications of the Green Belt designation and of the potential effects upon the overriding objectives of this policy designation. In accordance with paragraph 33 of PPS3, local evidence of current and future levels of need and demand must be set out in a Strategic Housing Market Assessment and other market information such as long-term house prices. In accordance with PPG2, and in the light of the Council's acceptance of the need for limited changes to the inner Green Belt as set out in para. 7.2.4 of the Core Strategy, there is a need for a robust and detailed review of existing boundaries to establish which parts of the Borough no longer serve a Green Belt function as identified in para. 1.5 of PPG2. In accordance with the requirements under PPS12 for a robust evidence base, and in accordance with para. 33 of PPS3 and para. 1.5 of PPG2, the Council should finalise its evidence base and incorporate its findings into the Core Strategy. The list of documents, as set out in Appendix 1, should be amended to reflect this given that overall the evidence base needs to cover issues such as the social, economic and environmental characteristics of the area. In addition more detailed studies to investigate the capacity of built-up areas to absorb future development should also be carried out as an urgent priority. Finally, it is recognised that the appropriate forum for the identification of sites for development is either through the Proposals Map Site Allocations DPD or relevant Area Action Plan. However it is worth stating at this stage that the allocation of Hadley Homes land interest incorporating Waterworld and Kingswood Nursery and associated land at the junction of Bullsmoor Lane and Great Cambridge Road, Enfield (see attached plan) will facilitate the delivery of housing at a highly sustainable location within the Plan period, thereby assisting in making the objectives of the Plan sound.</p>
Enfield's Spatial Vision and Strategic Objectives	3.2	Ms Anna Chapman	Planner British Waterways-London Region	<p>3.2.5 & 6 Economic Development and Enterprise BW agrees that through the intensification of employment land some may be able to be released for alternative uses. British Waterways particularly encourages the LPA to consider the release of employment sites adjacent to the canal, if they do not have any potential for utilising their canalised location for freight. In accordance with the Urban Task Force report 'Towards a Strong Urban Renaissance', published in November 2005, local authorities' land use designation for areas in close proximity to sites of special amenity value (e.g. rivers, canals, parks, etc) should be reviewed to explore the potential to accommodate more appropriate and sustainable uses that respond to their urban potential. Developments adjacent to the waterways should integrate with, maximise the opportunities and not detract from their attractiveness. BW shares the borough's desire to promote recreation and tourism along the waterways and recognise the contribution the change of use of non-residential sites could make to housing targets. The re-allocation of sites currently allocated for industrial uses could be redeveloped in a more sympathetic manner to animate and enhance the water environment, thus making it more attractive for recreation and tourism. BW would welcome early discussions with the Borough on the programme for the release of surplus industrial/ commercial</p>

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				land so that the potential for maximising the mutual benefits of waterside residential/ mixed use sites such as opportunities for environmental improvements can be identified at the very earliest stage. BW is keen to work with the Borough, developers and other key stakeholders to produce Waterspace Strategies to facilitate these improvements.
Enfield's Spatial Vision and Strategic Objectives	3.2	Ms Anna Chapman	Planner British Waterways- London Region	3.2.7 The Open & Built Environment: British Waterways requests that the first sentence of this paragraph includes reference to the River Lee Navigation given its importance as a form of open space within the borough, as follows: Inequalities in access to open space throughout the Borough will be reduced and access to the Lee Valley Regional Park and River Lee Navigation from the communities on its doorstep will be improved.
Enfield's Spatial Vision and Strategic Objectives	3.2	Ms Anna Chapman	Planner British Waterways- London Region	3.2.10 Travel and Movement & Strategic Objective 21 For the avoidance of doubt, British Waterways request that the Council express its commitment to encouraging waterborne freight transport within this section.
Enfield's Spatial Vision and Strategic Objectives	3.2	Ms Karen Foster-	Planning Liaison Officer Environment Agency	3.2.2 – The second sentence could conflict with PPS25: Development and Flood Risk as it is implied that development will be focussed along waterfronts, these will be the areas at highest risk of flooding, according to PPS25 areas at lowest risk of flooding should be considered first for redevelopment.
Enfield's Spatial Vision and Strategic Objectives	3.2	Ms Karen Foster-	Planning Liaison Officer Environment Agency	Page 16, Strategic Objectives – Please add the following additional objective: To protect and restore Enfield's floodplains. Page 17, Strategic Objectives – Please add the following additional objective: To ensure that new development is located in areas at least risk of flooding and are designed sustainably. Page 18, Strategic Objectives – Please add the following additional objective: To seek opportunities to restore rivers and their river corridors. Page 19, Strategic Objectives – Please add the following additional objectives: To ensure that new development is located in areas at least risk of flooding and are designed sustainably. To seek opportunities to restore rivers and their river corridors.
Enfield's Spatial Vision and Strategic Objectives	3.2	Mr Graham Saunders	Senior Regional Planning Advisor English Heritage - London Region	3.2.7 – 3.2.8 – It is welcomed that Enfield's suburbs have been recognised as a valuable and integral contribution to the character of the Borough. However other aspects of the Boroughs built heritage should not be forgotten, such as the historic core of Enfield or the former Mansions.

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Enfield's Spatial Vision and Strategic Objectives	3.2	Mr Matthew Roe (CgMs)	Senior Associate Director Metropolitan Police Authority	The MPA welcome the following strategic objectives: 9. 'To promote the provision of new social facilities, including schools, health and social services, to meet the needs of the existing population and new residents in places that are accessible'; and 11. 'To promote safer and stronger communities and reduce crime and fear of crime across the borough, particularly in the south and east'; and 16. '...create better places and safer and stronger communities through good urban design' The MPA also support the Council's spatial strategy which seeks 'new residential development will need to be supported by good social and utilities infrastructure: The Council and its partners will seek to ensure that such infrastructure is provided, retained, improved or expanded where needed... a full range of appropriate activities will be sought for the Borough's town centres'.
Enfield's Spatial Vision and Strategic Objectives	3.2	Mr Graham Saunders	Senior Regional Planning Advisor English Heritage - London Region	No. 18 – We would urge you to amend the this objective to say the following; To protect and enhance the Borough's conservation areas, listed buildings (buildings of national and local architectural or historic special interest, archaeological sites, schedule ancient monuments and historic parks and gardens; and their settings.
Enfield's Spatial Vision and Strategic Objectives	3.2	Mr John McGill	Deputy Director North London Strategic Alliance	Page 17, Strategic Objectives, point 12. This section also needs to refer to Stansted in reference to its potential growth.
Enfield's Spatial Vision and Strategic Objectives	3.2	Austin Mackie (DTZ Development & Planning)	Director St Modwen	In seeking to focus growth in three main areas, ie, the North Circular at Bounds Green, the Upper Lee Valley and Enfield Town; the preferred spatial vision appears to fail to recognise that specific town centres, including those such as Edmonton Green, which lie outside these priority areas, still represent significant delivery locations for many of the CS's key strategic objectives. We consider that the spatial strategy should make clear the importance of Edmonton Green as a town centre capable of delivering future growth and associated objectives.
Enfield's Spatial Vision and Strategic Objectives	3.2	Austin Mackie (DTZ Development & Planning)	Director St Modwen	The broad strategic objectives are supported, although at 24 in number, they are significant and cover many non-planning matters addressed in other place-shaping policy. The Council may wish to consider whether they are all required and also whether the remainder of the Core Strategy has a delivery mechanism inherent to supporting these objectives, ie, clarity in terms of the spatial development approach to 'what, where when'.

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Enfield's Spatial Vision and Strategic Objectives	3.2	Mr Patrick Blake	Network Strategy Highways Agency	<p>It is noted that paragraph 3.2.10 of the Core Strategy states that" improvements in access to the M25 will be pursued". As stated in our response to the Issues and Options Report, the HA is particularly concerned that improving access to the M25 could undo the benefits of the other proposals within the plan. Whilst we would be happy to reconsider any proposals the Council may have, our original concerns at the time of the 2001 Public Inquiry are still relevant. You will recall that these included concerns about the safety of junctions 25 and 26 of the M25 due to increased flows, especially of HGVs. Any scheme put forward will need to demonstrate that it can meet our original concerns and will be reviewed to ensure that any new issues that may have arisen in the intervening period are also addressed. Further to this, it should be noted that a focus on improving road-based access to the M25 corridor could encourage a lengthening and greater frequency of car-based journeys on an already highly congested part of the network, which would directly contradict the principles in PPG13 which states that planning should aim to "reduce the need to travel, especially by car" (paragraph 4, point 3). We therefore recommend that the Plan should seek to implement a full range of sustainable transport initiatives in preference to improving access to the M25. This would be in line with PPG13 and paragraph 8 of OfT Circular 02/2007 (Planning and the Strategic Road Network). In addition, it is recommended that the Plan should adopt land use strategies / policies and allocations which reduce the need to travel in the Borough. This would help to minimise the impacts of development on the SRN and would be in line with national policy set out in PPG13. To this end it is recommended that Strategic Objective 21 should be re-worded to state:" To reduce need to travel and encourage more sustainable methods of transport in order to improve movement, accessibility and orbital links within the Borough and north London sub-region and address the environmental impact of travel" This would help to ensure that the Plan meets with PPS12 (paragraph 4.24) Test of Soundness 4. We also refer you to our forthcoming comments in relation to the North East Enfield Area Action Plan Issues and Options Report.</p>
Enfield's Spatial Vision and Strategic Objectives	3.2	Mr Patrick Blake	Network Strategy Highways Agency	<p>Strategic Objective 22: As previously stated in our representations on the Issues and Options Report, the HA is concerned that development in North East Enfield and Central Leaside could generate a significant amount of traffic, given that these areas have particularly low public transport accessibility levels. If significant development is to take place in these parts of the borough, it is essential that it is accompanied by improvements to public transport, which should be phased in line with new development. To this end it is recommended that Strategic Objective 22 should be re-worded to state:" To improve the environment, infrastructure, sustainable travel and economic and social well-being in North East Enfield and Central Leaside". This would be in line with the objectives of PPG13 and would help to ensure that the Plan meets with PPS12 (paragraph 4.24) Test of Soundness 4. We also refer you to our forthcoming comments in relation to the North East Enfield and the Central Leaside Area Actions Plans.</p>

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Enfield's Spatial Vision and Strategic Objectives	3.2	Mr Stephen Wilkinson	Head of Planning and Regeneration Lee Valley Regional Park Authority	The Authority supports the core values underpinning the Council's Spatial Vision.
Enfield's Spatial Vision and Strategic Objectives	3.2	Caroline Dawson (Planning Potential)	Director Kier Property Developments Ltd and the Ponders End Trust	Strategic Objective 12 and Paragraphs 3.2.5/6: Kier Property Developments and The Ponders End Trust recognise the importance and employment value of the existing employment land in the Upper Lee Valley but consider it inappropriate for the Core Strategy to protect it per se, as suggested in paragraph 3.2.6. The existing employment areas have great potential for ongoing employment but also for additional uses so as to more fully integrate them into the local communities and urban areas. Such additional uses could include housing, retail and leisure activities which would facilitate the Government's objectives for mixed use planning. In response to Draft Strategic Objective 12, our clients would suggest the following rephrasing;" To maximise the economic potential of the Borough and to capitalise on the benefits arising from the 2012 Olympics." This would facilitate the Borough's employment potential whilst also allowing flexibility in future development such as to promote other Core Strategy objectives.
Enfield's Spatial Vision and Strategic Objectives	3.2	Caroline Dawson (Planning Potential)	Director Kier Property Developments Ltd and the Ponders End Trust	Our clients support the Core Strategy's recognition of the waterside, its potential to make a greater contribution and its influence on the shaping of future developments. In this respect, Strategic Objective 23 is endorsed. In addition, Kier Property Developments and The Trust support the aim to improve North East Enfield as referenced in Strategic Objective 22. This is most likely to be achieved via a flexible and contemporary view of current land uses, future site allocations and their potential to contribute to a future Enfield.
Enfield's Spatial Vision and Strategic Objectives	3.2	Duncan Bennett (CgMs Consulting)	Senior Associate Director Fairview New Homes Ltd	SECTION 3.2 STRATEGIC OBJECTIVE 9 Fairview New Homes objects to the current wording of Strategic Objective No 9 in that it fails to recognise the opportunity represented by existing facilities to provide for the needs of the existing population and new residents. Fairview New Homes wishes to see the role of improved existing facilities recognised within this objective and would therefore suggest the following wording: -"To promote the provision of new and improved social facilities, including schools, health and social services to meet the needs of the existing population and new residents in places that are accessible".

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Enfield's Spatial Vision and Strategic Objectives	3.2	Duncan Bennett (CgMs Consulting)	Senior Associate Director Fairview New Homes Ltd	SECTION 3.2 STRATEGIC OBJECTIVE 14 This objective seeks to protect and enhance Enfield in valuable green resources, retaining the open character of the Borough and safeguarding the Green Belt and other open space for the enjoyment of Enfield's residents now and in the future. Fairview New Homes objects to Strategic Objective 14 with regard to its inferred relevance to private open space. Fairview consider that the objective should be re-worded to clearly indicate that this policy objective relates to the Green Belt and public open space. In addition, whilst Fairview New Homes supports the protection of valued green spaces, they consider that such protection should be balanced by a need to release surplus areas of land for development. Fairview New Homes therefore seeks the inclusion of the following text on the end of Strategic Objective 14:- " subject to the results of Borough local open space assessments and open space studies".
Enfield's Spatial Vision and Strategic Objectives	3.2	Mr Giles Dolphin	Planning Decisions Manager Greater London Authority	Comment: Detailed comments regarding the 24 'Strategic Objectives' are set out under the relevant sections below. The 24 objectives should be in general conformity with all of the Mayor's six objectives and London Plan Policy I.1 requires all DPDs to take these objectives fully into account. As currently written London Plan Objectives 1 and 2 are not explicitly and fully taken into account in the 24 objectives and the objectives should be amended accordingly. Comment: Paragraph 3.2.2 'Climate Change and Environmental Protection'. The list of Strategic Objectives should be amended to include greater prevalence of public transport, including walking and cycling and its role in reducing the effects of climate change. Comment: Paragraph 3.2.10 – 11. Reference is made to pursuit of access improvements to the M25. Transport for London objects to any reference to new connections to the M25 and will not fund any proposals to increase major road capacity in North East Enfield. Comment: Paragraph 3.2.10 – 11. Reference is made to the North Circular Road west of the A10 being improved by Transport for London. It should be recognised in the text that this is to improve sustainability and road safety and includes improving conditions for cyclists, pedestrians and buses. The improvements to the operation of the A10 may need to be further developed within the NMP study if this area is to be subject to substantial increase in pressure from significant development. Objection and comment: Transport for London does not support reference to relying on private transport as being the main mode of transport in the short term. It should be amended to state; "...although in the short term private transport is likely to be a major mode of transport in the Borough". Strategic objectives should be expanded to include sustainable public transport, including walking and cycling. Suggested wording could be; "Government and London Plan policy encourages boroughs to promote a pattern of development that reduces the need to travel, especially by car. In Enfield this will be achieved by:- 1. Promoting public transport, walking and cycling (including minimum cycle parking standards) 2. Locating major trip generating developments in locations with good public transport accessibility 3. Requiring transport assessments and travel plans for large scale proposals (define thresholds in justification) 4. Encouraging the use of car pooling/car clubs and 5. Mitigating the impacts of road based freight and promoting alternatives." Comment: Paragraph 3.2.12. Within the key areas for growth (Enfield Town Centre/ Upper Lee/A406 Bounds Green Rd), Transport for London wishes to see more emphasis on public transport and measures to support sustainable travel behaviour

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				patterns as the key driver for change and regeneration in these areas.
Enfield's Spatial Vision and Strategic Objectives	3.2	David Phillips (GL Hearn)	Planning Director Hadley Homes	<p>The objectives of the Spatial Strategy for the protection of The Open and Built Environment, as set out in para. 3.2.7, are supported. However concern is raised to the first part of the penultimate sentence which states that: "In the north and east the Green Belt will continue to be protected ... "which could be interpreted to mean that the Green Belt will be protected for its own sake with no opportunity for review. This is counter to the conclusions referred to in para. 7.2.4 of the Core Strategy which state's that the option of not reviewing the detailed Green Belt boundary as part of the preparation of the new Plan was rejected. In line with PPS12, the Council should undertake a review of Green Belt boundaries, as part of its evidence base, to identify those sites suitable for release. Para. 3.2.7 is therefore inconsistent with para. 7.2.4 insofar as it fails to make provision for a review of the Green Belt. It is inconsistent with national planning policy, namely the need for a robust evidence base as outlined in PPS12 and particularly in relation to PPG2 and is also inconsistent with its own policy which necessitates the need for a Green Belt review and the limited release of Green Belt sites to accommodate additional development. The wording of para, 3.2.7 should be amended to say that:" Whilst it is an overriding objective to protect the Green Belt in the north and east there are parts of the Green Belt that no longer serve a Green Belt function and no longer meet the tests set out in PPG2 for keeping land in the Green Belt. Subject to review this land should be released to assist in meeting the future development needs of the Borough". Reference should be made in para. 3.2.7 of the need to review the detailed Green Belt boundaries due to the fact, as acknowledged in para. 7.2.4, that there will be limited Green Belt releases within the Borough to accommodate some new homes. It should be further stated that the extent of the Green Belt releases and the identification of land for development will be defined on the Proposals Map accompanying the Site Allocations DPD. In order to protect the Green Belt in the longer term it should be stated that:" Where limited local scale land release is required for the planned developments, the overall schemes will provide for measures to enhance the surrounding Green Belt and incorporate design features that reinforce and secure defensible Green Belt boundaries that are sustainable into the long term". Finally, it is recognised that the appropriate forum for the identification of sites for development is either through the Proposals Map Site Allocations DPD or relevant Area Action Plan. However it is worth stating at this stage that the allocation of Hadley Homes land interest incorporating Waterworld and Kingswood Nursery and associated land at the junction of Bullsmoor Lane and Great Cambridge Road, Enfield (see attached plan) will facilitate the delivery of housing at a highly sustainable location within the Plan period, thereby assisting in making the objectives of the Plan sound.</p>
The Spatial Strategy	3.3	Mr Andrzej Warhaftig	Business Manager Enterprise Enfield	3.3.13 - we support the preferred option, as expressed.

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The Spatial Strategy	3.3	Mr Mark Hayes	The Chair Enfield Housing Association Forum	The Preferred Option for Enfield's Spatial Strategy identifies appropriate locations for planned growth and regeneration. The effectiveness of the LDF will be judged by the progress made on provision of appropriate infrastructure, the quality of the built and open environment and progress made in nurturing employment generating activities.
The Spatial Strategy	3.3	Ms Karen Foster-	Planning Liaison Officer Environment Agency	3.3.3 – Bullet Point 1 – It should be noted that these master plan areas are located in the part of your borough which is at highest risk of flooding in accordance with your SFRA, redevelopment of this area will have to comply with the policy recommendations made in your SFRA, PPS25 and the Thames Catchment Flood Management Plan.
The Spatial Strategy	3.3	Mr Graham Saunders	Senior Regional Planning Advisor English Heritage - London Region	It is noted that the three areas identified Upper Lee Valley, North Circular Road corridor and Enfield Town, will all contain to some degree or another heritage assets set within a wider historic environment. We would seek to ensure that this Strategy recognises the value of these assets and the wider historic environment and that this recognition is fed into the emerging Area Action Plans. The text of the strategy should therefore be amended so that the historic environment is explicitly recognised as a valuable component of the Boroughs environment.
The Spatial Strategy	3.3	Caroline Dawson (Planning Potential)	Director Kier Property Developments Ltd and the Ponders End Trust	Our client's comments on the Enfield Spatial Strategy are as follows; • Support for the focusing of regeneration on the Upper Lee Valley. • Support for planned growth in the Upper Lee Valley. • An objection to the Council's proposal to "protect land needed for existing and future employment generating activities" in that, whilst the philosophy may be sound, the detail is where acceptability will need to be assessed. Whilst this may be a matter for the Area Action Plans, it is relevant to record that some of the major employment areas in the Upper Lee Valley do not make a positive contribution to local urban form and sit apart from local communities. Their reintegration into the local area would be beneficial and this would be best achieved via a mixed use approach to their future, as opposed to a protective employment approach. Further, considering the fact that there are substantial areas that separate the local residential community from the Lee Valley, the proposed approach in this part of the Spatial Strategy could be in direct conflict with Strategic Objective 23. Our client's land at the Ponders End Industrial Estate is a substantial landholding which has, historically, been focused on commercial/ employment development. Being substantial in its own right, it further adds to the extensive Brimsdown Industrial Area which extends to the north. To the east is the Upper Lee Valley and its open space and leisure opportunities, and to the west, are residential communities. The substantial Ponders End Industrial Estate, therefore, represents a material barrier between residential areas and the Upper lee Valley and constitutes a, now, outdated approach to urban planning where uses are entirely segregated. The contemporary approach to land use planning which encourages mixed use developments is a more able way to ensure better integration of a variety of uses and improve accessibility between residential areas and the services and facilities they need to access on a regular basis. Our clients propose a mixed use redevelopment of the Ponders End Industrial Estate which would more easily facilitate these objectives, which

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				are also reflected in the Core Strategy. Our clients would, therefore, prefer to see the reference to the protection of employment land as a strategy which follows a review of existing employment sites, their future employment or mixed use potential and their role in the evolution of the Borough's communities and the Core Strategy. Our clients oppose the rigid protection of employment land solely because that is its existing or historic use.
The Spatial Strategy	3.3	Mr Giles Dolphin	Planning Decisions Manager Greater London Authority	Comment: Section 3.3, particularly the strategic priorities for North London, should be updated throughout to reflect the current London Plan. Paragraph 3.3.2 should included a bullet point stating that transport provision will be integrated with development which will be designed and delivered in a manner to support sustainable travel patterns and reduce the need to travel by car. Comment: Paragraph 3.3.4. The reference to planning for transport infrastructure, including local schemes to improve public transport, cycling and walking is welcomed.
The Spatial Strategy	3.3	David Phillips (GL Hearn)	Planning Director Hadley Homes	3.3: The Spatial Strategy with particular reference to 'Preferred Option Enfield's Number Spatial Strategy Focused Growth' and paras. 3.3.13 and 3.3.14. The preferred option for focusing growth within the core urban areas as set out in the Core Strategy is broadly supported. However, given the Council's acknowledgment of the likely need for the limited release of Green Belt sites, the Option needs to reflect a degree of flexibility in order to accommodate the release of peripheral Green Belt sites with good access to public transport and which are supported by a range of shops and services. Paras. 3.3.13, 3.3.14 and 'Preferred Option Enfield's Spatial Strategy Focused Growth' is inconsistent with para. 7.2.4 of the Core Strategy insofar as it fails to make provision for a review of the Green Belt. It is inconsistent with national planning policy, namely the need for a robust evidence base as outlined in PPS12 and particularly in relation to PPG2 and is also inconsistent with its own policy which necessitates the need for a Green Belt review and the limited release of Green Belt sites to accommodate additional development. The wording of paras. 3.3.13, 3.3.14 and 'Preferred Option Enfield's Spatial Strategy Focused Growth' needs to be amended to facilitate the need for limited Green Belt releases within the Borough to accommodate some new homes. It should be further stated that the extent of the Green Belt releases and the identification of land for development will be defined on the Proposals Map accompanying the Site Allocations DPD. Finally, it is recognised that the appropriate forum for the identification of sites for development is either through the Proposals Map Site Allocations DPD or relevant Area Action Plan. However it is worth stating at this stage that the allocation of Hadley Homes land interest incorporating Waterworld and Kingswood Nursery and associated land at the junction of Bullsmoor Lane and Great Cambridge Road, Enfield (see attached plan) will facilitate the delivery of housing at a highly sustainable location within the Plan period, thereby assisting in making the objectives of the Plan sound.

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ENFIELD'S SPATIAL STRATEGY	Preferred Option	Ms Sule Nisancioglu	Group Manager, Planning Policy and Transportation London Borough of Haringey	It is noted that two of the areas in the preferred option for the Spatial Strategy (focused growth) are near /adjacent to Haringey borough boundary. Any future growth and regeneration near a neighbouring borough boundary should take account of infrastructure needs in the surrounding area and of the local communities including the neighbouring borough's communities.
ENFIELD'S SPATIAL STRATEGY	Preferred Option	Mr Stephen Conroy	Deputy Chief Executive Enfield Primary Care Trust	The option of focused growth around the Upper Lee Valley, the North Circular Road at Bounds Green and Enfield Town is broadly welcomed as is the recognition that new residential development will need to be accompanied by good social and utilities infrastructure which will need to include health facilities. Due recognition is urged of the recent cross-government strategy 'Healthy Weight, Healthy Lives' with a number of recommendations for urban development (DH, 2008). The PCT recognises the need for development along the Upper Lee Valley and particularly in the South-east of the Borough. This should complement the PCTs forthcoming Primary Care and Estates strategies which will enable the PCT to deliver a wider range of modern health services in a 21st century care environment. As such, subject to local consultation, there is likely to be major redevelopment and concentration of Primary Care sites into 'hub and spoke' models with the PCT seeking to develop larger primary care centres (hubs) serving populations of approximately 50,000 patients with further spokes serving populations of 10,000 or more (spokes). Developments smaller than this are unlikely to attract support from the PCT unless there are exceptional circumstances e.g. a facility providing care for an geographically isolated part of the borough / development is already part of an existing facility. The PCT therefore supports the spatial strategy and as part of this will seek support from the Council for the development of its 'hub and spoke' model for primary care. This may involve working with the Council to develop land that is currently owned by the Council. In analysis of its current capacity and provision of healthcare sites 50% of the current GP estate is below minimum standard, although many can be brought up to standard with some investment. The PCT therefore welcomes the further opportunity to review urban development, particularly with regards to Palmers Green / Southgate where there is a population concentration but a scarcity of primary care sites. Development of sites within this area may be appropriate in the future, in consultation with the Council and the public and with due regard to any Area Action Plans that may be developed within this area. The PCT would welcome the opportunity to co-locate primary care services with appropriate service for example, children's centres, schools/academies and social services.
ENFIELD'S SPATIAL STRATEGY	Preferred Option	Mr Patrick Blake	Network Strategy Highways Agency	The HA is concerned that whilst the borough is seeking to maximise the number of additional homes built during the Plan period, there is no mention of the need to balance housing with employment, as recommended by PPG13. A balanced level of housing and employment can help to reduce need to travel and the subsequent impact on the SRN. In order to ensure that the document meets with PPS12 (paragraph 4.24) Test of Soundness 4 it is recommended that

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				<p>Enfield's Spatial Strategy includes a specific reference to the need to deliver a balanced level of housing and employment both within the borough's different centres and across the borough. It is noted that the Spatial Strategy also proposes that "a full range of appropriate activities will be sought for the Borough's town centres". Whilst the HA welcomes this approach, it should be noted that paragraph 16 in the housing section of PPG13 states that in addition to employment and retail functions, residential and mixed use development in town centre locations should be maximised in order to reduce need to travel. It is therefore recommended that the above quote is re-worded to state "a full range of appropriate activities, including high density residential and mixed use development, will be sought for the Borough's town centres".</p>
ENFIELD'S SPATIAL STRATEGY	Preferred Option	Ms Vilna Walsh (First Plan)	Director National Grid Property Holdings	<p>National Grid support the objective of focussing planned growth and regeneration in the three broad locations identified in the Spatial Strategy and in particular within the Upper Lee Valley. The Upper Lee Valley offers significant opportunities for maximisation of development and regeneration, both for residential and non-residential purposes. The Preferred Approach is in accordance with strategic priorities for North London as set out in the London Plan, and notably Policy 5B.1, in respect of optimising the development of Opportunity Areas, managing the reuse of surplus industrial land, and delivering the London element of the Government's priority for the London-Stansted-Cambridge-Peterborough corridor for development, regeneration and improvement. In focussing planned growth in the Upper Lee Valley area it will be important that the approach adopted accords with guidance provided in the London Plan and accompanying SPG on Industrial Capacity (Adopted March 2008) particularly in terms of reviewing Strategic Industrial Land (SIL) designations and the consolidation of employment uses in appropriate locations. References in the text of the Preferred Option to managing the release of unproductive surplus land for other uses is therefore welcomed. However, it should be clear within the Spatial Strategy, that the extent to which particular sites can contribute to the growth and regeneration of the Upper Lee Valley area will be a key factor in considering whether or not they can be released for alternative uses, as will site specific considerations. On this basis a positive approach to change of use where there is no likelihood of demonstrable harm and where key regeneration objectives can be met is advocated. In this context it is highlighted that National Grid are currently in detailed discussions with the London Borough of Enfield (LBE) and the Greater London Authority (GLA) in respect of proposals to bring forward land historically in use for gas manufacture in the Upper Lee Valley Area, for residential or residential led mixed use development. There are very particular site constraints, and most notably in terms of viability issues related to the removal of operational gas holders and remediation requirements, which would preclude them from coming forward for employment led development. However, the benefits to the wider area in terms of changing perceptions, pump-priming regeneration, visual amenity and public realm improvements which could be achieved by the removal of the gas holders and redevelopment of the sites are integral to the planned regeneration of the wider area. The following wording, shown in bold and underlined [see attached representation - these markings are incompatible with Limehouse], and amendments shown struck through, should be incorporated within the final paragraph of the text for the Enfield's Spatial Strategy Preferred Option: <u>The Council will continue to nurture Enfield's businesses; it will protect land which is</u></p>

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				suitable for existing and future employment-generating activities, while managing the release of unsuitable or unproductive surplus land for other uses. A positive approach to change of use where there is no likelihood of demonstrable harm and where key regeneration objectives can be met will be supported.
ENFIELD'S SPATIAL STRATEGY	Preferred Option	Mr Giles Dolphin	Planning Decisions Manager Greater London Authority	Support with conditions: the preferred option of 'focused growth', rather than 'dispersed growth' or 'minimum growth', is supported subject to all comments below being fully reflected in the submission version of the core strategy. The preferred option refers to exceeding the London Plan housing targets through planned growth which is welcomed but this approach must be comprehensively underpinned with corresponding infrastructure improvements, particularly in public transport, and at densities in accordance with those specified in the London Plan. The policy should make clear reference to this. The following changes to the wording of the second paragraph are recommended: "...New residential development will need to be supported by good public transport, social and utilities infrastructure and achieve the maximum intensity of use having regard to development plan the policy.
Key diagrams	3.4	Austin Mackie (DTZ Development & Planning)	Director St Modwen	The scale and future importance of Edmonton Green is such that its role within the Borough should be recognised on the key diagrams.
Key diagrams	3.4	Duncan Bennett (CgMs Consulting)	Senior Associate Director Fairview New Homes Ltd	ENFIELD KEY DIAGRAM PAGE 24 Fairview New Homes supports the inclusion of a Key Diagram within the Core Strategy. This is in line with PPS12 which indicates that the Core Strategy should set out broad locations for delivering the housing and other strategic development needs (paragraph 2.10 PPS12)
Key diagrams	3.4	David Phillips (GL Hearn)	Planning Director Hadley Homes	3.4: Enfield The Key Diagram (Figure 3.2 Enfield Key Diagram) For the reasons set out in our submissions on paras. 3.1, 3.1.2 and Appendix 1; 3.2, 3.2.7; 3.3, 3.3.13, 3.13.14 and 'Preferred Option Enfield's Spatial Strategy Focused Growth' it is considered in appropriate to include Figure 3.2 Enfield Key Diagram as part of the Core Strategy. The plan is more than a key diagram and shows detailed boundaries, including that of the Green Bell and other potential designations including Area Action Plans, which will be the subject of separate Development Plan Documents in the form of Area Action Plan DPDs and the identification of land for development will be defined on a Proposals Map accompanying the Site Allocations DPD. The Core Strategy is unsound for the reasons referred to in our objections to paras. 3.1, 3.1.2 and Appendix 1; 3.2, 3.2.7; 3.3, 3.3.13, 3.13.14 and 'Preferred Option Enfield's Spatial Strategy Focused Growth' This element of the Core Strategy can be made sound through the deletion of Figure 3.2 Enfield Key Diagram from the Core Strategy.

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Climate Change & Environmental Protection: overarching policies for a sustainable Enfield	4	Mr Graham Saunders	Senior Regional Planning Advisor English Heritage - London Region	We would seek to ensure that the Borough's heritage assets, their setting and the wider historic environment are given equal consideration and appreciation when exploring environmentally appropriate design and construction solutions, carbon use, renewable energy and efficiency, and the re-use of materials.
Climate Change & Environmental Protection: overarching policies for a sustainable Enfield	4	Mr John McGill	Deputy Director North London Strategic Alliance	There does not appear to be any reference to green roofs as a way of improving biodiversity and reducing flood risk. (also see earlier point referring to role of town centres). This section should refer to the importance of local employment, for example based in and around town centres, as being a way to reduce need for journeys, many of which will be made by private car.
Climate Change & Environmental Protection: overarching policies for a sustainable Enfield	4	Mr Stephen Conroy	Deputy Chief Executive Enfield Primary Care Trust	The PCT welcomes LBE's commitment to combating climate change. This has been referred to as the greatest challenge facing public health. There is agreement that the Borough should aim for, and achieve, each of the areas set out in the core policies. As part of this, the emphasis on encouraging people to walk and cycle will not only benefit the individual's but also the health of the Borough. Here it may be useful to set targets on the percentage of people who walk / cycle to work and to ensure that the Borough does not return any further funding for cycling projects to central government. The emphasis on building standards is welcomed though as 75% of housing that will exist in 2050 already exists it may useful to identify how people in the borough can reduce their carbon footprint in their current premises. This may include building standards for extensions etc and making planning permission / permission to build for decentralised energy systems much easier to obtain. Of obvious importance to the climate change agenda is transport and the PCT welcomes the numerous mentions of intentions to encourage walking and cycling though it is disappointing that whilst the strategy has targets on waste and air pollution no mention of targets for percentages of people using active travel to commute to work have been mentioned, this despite that only 1.19% of working people cycle to work and 6.46 walk (census 2001). There is an obvious symbiosis of health, climate change, noise and air pollution, congestion, access to services (particularly for the 28.5% of Enfield residents that do not have access to a car) and economic sense that might be exploited here. The PCT Estates and Service Strategy proposes that the 'hub sites' should be located in areas of high density population that are currently served by good transport links. This should maximise the opportunity for patients to access services and minimise the number of journey's taken.

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Climate Change & Environmental Protection: overarching policies for a sustainable Enfield	4	Austin Mackie (DTZ Development & Planning)	Director St Modwen	Edmonton Green represents a key location in terms of the Borough's sustainable spatial development strategy and to promoting sustainable growth.
Climate Change & Environmental Protection: overarching policies for a sustainable Enfield	4	Mr Stephen Wilkinson	Head of Planning and Regeneration Lee Valley Regional Park Authority	Core Policy 1 Sustainable and Efficient Land Use and Core Policy 2 Sustainable Design and Construction; Energy; and Combined Cooling, Heat and Power are also supported. The Authority places particular importance on the detailed criteria to be set out in the Development Management Document as this will be underpin the success of these policies, for example, with criteria for sustainable design and construction, renewable energy generation, the use of green roofs and walls and appropriate landscaping.
Introduction	4.1	Ms Anna Chapman	Planner British Waterways-London Region	With regard to our responsibilities for the River Lee Navigation, British Waterways requests that we are consulted on the Strategic Flood Risk Assessment currently being undertaken.
Introduction	4.1	Mr Mark Hayes	The Chair Enfield Housing Association Forum	Strategic Objective 5 should be strengthened by recognising the business and employment gain that could be achieved through pro-active development of the management and treatment of waste, particularly using new technologies
Introduction	4.1	Ms Karen Foster-	Planning Liaison Officer Environment Agency	4.1.2 – Please add to the last sentence 'and reduce flood risk'.
Introduction	4.1	Ms Karen Foster-	Planning Liaison Officer Environment Agency	Page 25, Strategic Objectives – Please add the following additional objective: To ensure that new development is located in areas at least risk of flooding and are designed sustainably.

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Introduction	4.1	Ms Karen Foster-	Planning Liaison Officer Environment Agency	Page 26, Bullet Point 3 – Last sentence is poorly worded please change to ‘A large part of the Lee Valley and its tributaries are at significant risk of flooding. A Strategic Flood Risk Assessment has been completed and it has demonstrated that Enfield is at risk of flooding from a range of sources’. Page 26, Bullet Point 4 – Flood probabilities are incorrectly worded and need to be rewritten to comply with PPS25. Flood Zone 3 is defined as having a 1 in 100 or greater annual probability of flooding. Flood Zone 2 is land assessed as having between a 1 in 100 and 1 in 1000 annual probability of flooding. Page 26, Bullet Points – Needs to be mentioned that as a result of climate change the extent of floodplains will increase. This section needs to also describe the other sources of flooding that you have identified in your SFRA, for examples surface water flooding is a big problem for LB Enfield.
Introduction	4.1	Mr Giles Dolphin	Planning Decisions Manager Greater London Authority	Support: Objectives 1, 3, 4, and 5 are supported.
Introduction	4.1	Mr Giles Dolphin	Planning Decisions Manager Greater London Authority	Comment: The bullet point text on pages 25 and 26 entitled “climate change and environmental protection in Enfield” refers to the Gas-fuelled power station at Brimsdown. There is no reference in this section to this utilizing the heat from this power station. There could be the opportunity to develop this power station to provide heat as well as power, and as such it would be positive to reference that opportunity here and elsewhere where appropriate. The reference to the borough-wide Air Quality Management Area, the problem of traffic-sourced PM10 and NO2 and the need to improve local air quality is welcome. Comment: Paragraph 4.1.3, last bullet point. The role of the Borough’s Core Strategy within the North London Waste Plan should be clarified.
Reducing the Borough’s carbon footprint	4.2	Mr Peter O’Brien	Partnership Manager Learning Skills Council	Core policy 6 and paragraphs 4.4.22 and 4.4.23 are not clear and appear to be inconsistent with The Lee Valley Regional Park Plan (para 2.2.10), which saw the waterways as an asset for enjoyment and leisure-related employment. Short-term extraction of aggregates that would allow the reservoirs to be expanded for the type of leisure use envisaged in the Regional Park Authority’s Plan are to be supported, but permanent dredging would work against that plan. We would support a clearer commitment to the Park Authority’s Plan or a more detailed explanation why an alternative is being advanced in Enfield.
Reducing the Borough’s carbon footprint	4.2	Mr Andrzej Warhaftig	Business Manager Enterprise Enfield	In 4.2.2 we support the expressed Core Policy 1 In 4.2.11 we support the expressed Core Policy 2

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Reducing the Borough's carbon footprint	4.2	Ms Anna Chapman	Planner British Waterways-London Region	Implementation para 4.2.5 British Waterways requests that reference is made to the need for the development of waterside sites to consider the feasibility of using waterborne freight transport in Transport Assessments.
Reducing the Borough's carbon footprint	4.2	Ms Karen Foster-	Planning Liaison Officer Environment Agency	4.2.5 – Should also add the following bullet point: · Seek to reduce flood risk and ensure that new development complies with PPS25 and the Thames Catchment Flood Management Plan.
Reducing the Borough's carbon footprint	4.2	Duncan Bennett (CgMs Consulting)	Senior Associate Director Fairview New Homes Ltd	Fairview new homes object to core policy 2. Whilst the policy seeks to follow the provisions of policy 4A.3. 4A.6 and 4A.7 of the London Plan it is considered that the policy fails to sufficiently emphasise the feasibility provision within these policies. Fairview new homes seeks the inclusion of the following text at the end of the final sentence in core policy 2: "unless it can be demonstrated that such provision is not feasible".
Reducing the Borough's carbon footprint	4.2	Mr Giles Dolphin	Planning Decisions Manager Greater London Authority	Comment: Paragraph 4.2.1. The Borough's carbon footprint could also be reduced through generating renewable energy from waste (partially or wholly renewable depending on the feedstock) and transporting waste on the river, utilising the extensive blue-ribbon network in the borough. Comment: Paragraphs 4.2.5 – 4.2.8. The reference to the use of maximum car parking standards and minimum cycle parking standards and green travel plans for the forthcoming 'Development Management Document', and encouraging walking, cycling and reduced car use through the proposed 'Enfield Design Guide' is welcome. Comment: The Council should consider any potential impact from emissions of NOx, PM10 and SO2 from central boiler and energy systems and any indirect impacts from the transportation of fuels on local air quality concentrations. Comment: Paragraph 4.2.21. The Borough should consider developing facilities to produce transport fuels from waste and/or encouraging their use in their fleet provision.
Reducing the Borough's carbon footprint	4.2	Mr Giles Dolphin	Planning Decisions Manager Greater London Authority	The Preferred options document include policies for flooding, overheating and water conservation, which are all welcomed, although in each case the submission policy will need to more closely reflect the relevant London Plan policy.
CORE POLICY 1: SUSTAINABLE AND EFFICIENT LAND USE	Preferred Option	James Stevens	Regional Planner (London) Home Builders Federation Ltd	This is too vaguely worded for a policy. It is too aspirational and it and the accompanying text needs to spell out who will be responsible for what; how elements of the plan will be delivered and what are the development priorities in which parts of the borough.

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CORE POLICY 1: SUSTAINABLE AND EFFICIENT LAND USE	Preferred Option	Mr Chris Baker	Government Office for London	We are not sure that this policy is necessary. It is largely repetitive of national policy and the London Plan. Making efficient and sustainable use of land is something that all local authorities should be doing. Also, there would be problems in measuring the implementation of this policy.
CORE POLICY 1: SUSTAINABLE AND EFFICIENT LAND USE	Preferred Option	Mr Dominic Coath	Natural England	It should be noted that previously developed land can frequently be of higher value for wildlife than an equivalent area of undeveloped land. This needs to be taken into account when considering such allocations.
CORE POLICY 1: SUSTAINABLE AND EFFICIENT LAND USE	Preferred Option	Austin Mackie (DTZ Development & Planning)	Director St Modwen	This policy should acknowledge the role of town centres and Edmonton Green as an important element in the delivery of sustainable patterns of development.
CORE POLICY 1: SUSTAINABLE AND EFFICIENT LAND USE	Preferred Option	Ms Vilna Walsh (First Plan)	Director National Grid Property Holdings	National Grid support the main thrust of this policy which broadly accords with the guidance and objectives of PPS1, PPS22 and the London Plan; and in particular with respect to optimising the use of previously developed land. It is highlighted, however, that bringing previously developed land back into use can raise issues of viability and abnormal costs such as for remediation which green field sites do not give rise to. The supporting text to the policy should make reference to this point and the following wording is suggested: It is acknowledged that brownfield land, and particularly land which is contaminated, is often more expensive to develop than Greenfield land. Where particular sites give rise to abnormal costs the benefits of bringing that previously developed land back into productive use will need to be considered and weighed against the range of other policy considerations in the Core Strategy and other development plan documents.
CORE POLICY 1: SUSTAINABLE AND EFFICIENT LAND USE	Preferred Option	Miss Renee Goodwin (GVA Grimley Ltd)	Principal Planner La Salle Investment Management	We support the promotion of sustainable and efficient use of land and the goal to optimise the use of previously developed and vacant land or underused buildings.
CORE POLICY 1: SUSTAINABLE AND EFFICIENT LAND USE	Preferred Option	Duncan Bennett (CgMs Consulting)	Senior Associate Director Fairview New Homes Ltd	Fairview New Homes support Core Policy 1 in its promotion of the sustainable and efficient use of land, optimising the use of previously developed land and the improvement of integration between land use and transport. This is in line with the principles set out in PPS1.

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CORE POLICY 1: SUSTAINABLE AND EFFICIENT LAND USE	Preferred Option	Mr Giles Dolphin	Planning Decisions Manager Greater London Authority	Support with conditions: This policy is supported but neither this policy nor those relating to housing in subsequent sections include the residential density ranges necessary to ensure sustainable and efficient land use. Policy 3A.3 of the London Plan requires Borough's to develop residential density policies in their DPD's in line with it and adopt the residential density ranges set out in Table 3A.2. The omission of such a policy would cause significant harm to the implementation of the London Plan and undermine the implementation of Core Policy 1 and so the submission version must introduce such a policy either as part of this policy, another policy or as a stand alone policy.
CORE POLICY 2: SUSTAINABLE DESIGN & CONSTRUCTION; ENERGY; AND COMBINED COOLING, HEAT & POWER	Preferred Option	Mr Mark Hayes	The Chair Enfield Housing Association Forum	CORE POLICY 2 should be implemented pro-actively through the promotion of "exemplar" developments. Carbon neutral development is now possible and should be encouraged at every opportunity.
CORE POLICY 2: SUSTAINABLE DESIGN & CONSTRUCTION; ENERGY; AND COMBINED COOLING, HEAT & POWER	Preferred Option	James Stevens	Regional Planner (London) Home Builders Federation Ltd	While we acknowledge that this policy is in conformity with the London Plan, we strongly recommend that some allowance is made for site viability. This is especially necessary given the Council's other ambitious targets to provide 50% affordable housing, and its other s106 obligations to help support local services. We welcome the acknowledgement that the feasibility of providing on-site renewables and linking up to decentralised energy should be assessed. This supports paragraph 26 of the Supplement to PPS1 which states: 'Planning authorities should have an evidence-based understanding of the local feasibility and potential for renewable and low-carbon technologies, including microgeneration, to supply new development in their area.' However, it is not enough to simply state that developments will be encouraged to link-up to decentralised energy systems. The Council will also need to set out, either in the Core Strategy or else the relevant Area DPD, how it intends to achieve this. This is necessary since paragraph 33 of the Supplement to PPS1 states: 'Any policy relating to local requirements for decentralised energy supply to new development or for sustainable buildings should be set out in a DPD, not a supplementary planning document, so as to ensure examination by an independent Inspector'. It goes to state that policies should be a) evidence-based and viable, having regard to the overall costs of bringing sites to the market and in the case of housing; b) demonstrate that the policy will not obstruct housing supply and the pace of development as shown in the housing trajectory; and c) set out how the Council will assist developers to implement these requirements. Since these details have not been spelt out in the Preferred Options, they will need to be in prepared for the Submission stage, otherwise the Core Strategy is at risk of failing PPS12 tests of soundness iv, viii and ix.

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CORE POLICY 2: SUSTAINABLE DESIGN & CONSTRUCTION; ENERGY; AND COMBINED COOLING, HEAT & POWER	Preferred Option	Mr Chris Baker	Government Office for London	This policy largely replicates Policy 4A.7 of the (consolidated) London Plan. As a local policy it should go further especially providing more detailed advice on matters such as the broad areas where renewable energy technologies would be appropriate.
CORE POLICY 2: SUSTAINABLE DESIGN & CONSTRUCTION; ENERGY; AND COMBINED COOLING, HEAT & POWER	Preferred Option	Ms Karen Foster-	Planning Liaison Officer Environment Agency	This policy should first make reference to reducing consumption of energy.
CORE POLICY 2: SUSTAINABLE DESIGN & CONSTRUCTION; ENERGY; AND COMBINED COOLING, HEAT & POWER	Preferred Option	Ms Vilna Walsh (First Plan)	Director National Grid Property Holdings	National Grid support the main thrust of Core Policy 2 which broadly accords with the guidance and objectives of PPS1, PPS22 and the London Plan. However, the policy should allow sufficient flexibility to ensure that development economics and the feasibility of provision can be taken into account when considering its application on a site by site basis. The following additional wording shown in bold and underlined should be included within the policy: The Council will aim to reduce carbon dioxide emissions by 20% through on-site renewable energy generation taking into account development economics and the viability and feasibility of provision. In accordance with the London Plan the LPA have the option, of course, to add supporting text to the policy which addresses those situations where renewable technologies cannot be provided on the basis of feasibility or viability considerations. For example developments not initially incorporating solar technologies should be encouraged, where practicable, to be of a suitable design and orientation to support them later.

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CORE POLICY 2: SUSTAINABLE DESIGN & CONSTRUCTION; ENERGY; AND COMBINED COOLING, HEAT & POWER	Preferred Option	Mr Giles Dolphin	Planning Decisions Manager Greater London Authority	<p>Objection: This policy does not adequately reflect the requirements of the London Plan climate change policies and would therefore cause significant harm to the implementation of the London Plan. In particular it only commits to promoting decentralized energy systems where feasible. This language does not reflect the London Plan and the core policy should require developers to assess the potential for decentralised energy systems, Combined Heat and Power, Combined Cooling Heat and Power, and the opportunities to either connect to existing decentralised heating, cooling and/or power networks or extend the on-site decentralised heat and power networks that will be created to other developments on or near the development site. The Policy also states that the Council will aim to reduce carbon dioxide emissions by 20% through on-site renewable energy generation. This sentence does not make clear that the responsibility should be on the developer to identify and install renewable technologies on-site that will reduce the development's CO2 emissions by 20%. The policy should reflect the London Plan and require developers to install on-site renewable energy generation that will reduce the development's CO2 emissions by 20% unless it can be demonstrated that such a reduction is not feasible. The onus is on the developer to demonstrate that 20% is not achievable, and not on the Council to aim to achieve a 20% reduction. This core policy must be in general conformity with all aspects of the following London Plan policies:</p> <ul style="list-style-type: none"> • Policy 4A.1: The Borough should adopt the following hierarchy when assessing planning applications: 1. using less energy, in particular by adopting sustainable design and construction measures (Policy 4A.3); 2. supplying energy efficiently, in particular by prioritising decentralized energy generation (Policy 4A.6); and 3. using renewable energy (Policy 4A.7). • Policy 4A.4: The Borough should require an assessment of the energy demand and carbon dioxide emissions from proposed major developments, which should demonstrate the expected energy and carbon dioxide emission savings from the energy efficiency and renewable energy measures incorporated in the development, including the feasibility of CHP/CCHP and community heating systems. • Policy 4A.5: The Borough should ensure that all new development is designed to connect to the heating and cooling network (where they have been identified) • Policy 4A.6: The Borough in its DPD should require all developments to demonstrate that their heating, cooling and power systems have been selected to minimise carbon dioxide emissions. Developments should evaluate combined cooling, heat, and power (CCHP) and combined heat and power (CHP) systems and where a new CCHP/CHP system is installed as part of a new development, examine opportunities to extend the scheme beyond the site boundary to adjacent areas. The Mayor will expect all major developments to demonstrate that the proposed heating and cooling systems have been selected in accordance with the following order of preference: 1. connection to existing CCHP/CHP distribution networks; 2. site-wide CCHP/CHP powered by renewable energy; 3. gas-fired CCHP/CHP or hydrogen fuel cells, both accompanied by renewables; 4. communal heating and cooling fuelled by renewable sources of energy; 5. gas fired communal heating and cooling. • Policy 4A.7: The Borough should, in their DPD, adopt a presumption that developments will achieve a reduction in carbon dioxide emissions of 20% from on site renewable energy generation (which can include sources of decentralised renewable energy) unless it can be demonstrated that such provision is not feasible.

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CORE POLICY 2: SUSTAINABLE DESIGN & CONSTRUCTION; ENERGY; AND COMBINED COOLING, HEAT & POWER	Preferred Option	Mr Giles Dolphin	Planning Decisions Manager Greater London Authority	Comment: The Borough's carbon footprint could also be reduced through generating renewable energy from waste (partially or wholly renewable depending on the feedstock). This should be reflected in the core policy and in paragraphs 4.2.15 and 4.2.17.
CORE POLICY 2: SUSTAINABLE DESIGN & CONSTRUCTION; ENERGY; AND COMBINED COOLING, HEAT & POWER	Preferred Option	Mr Giles Dolphin	Planning Decisions Manager Greater London Authority	Sustainable development The preferred option aims to reduce carbon dioxide emissions from new developments by 20% through on-site renewable energy generation. This is strongly supported as it complements London Plan policy. However, the Submission policy should be drafted to clarify that it is the developer's responsibility to achieve this, rather than just a Council aim. Furthermore the reference to promoting de-centralised energy where feasible is not worded strongly enough to ensure that this key priority of the London Plan is delivered – the policy should require developers to assess the potential for decentralised energy systems. The Submission policy should ensure that the London Plan energy hierarchy is applied and the submission of energy assessments with planning applications is a requirement.
CORE POLICY 2: SUSTAINABLE DESIGN & CONSTRUCTION; ENERGY; AND COMBINED COOLING, HEAT & POWER	Preferred Option	Philip Murphy	Associate RPS	Dwyer fully supports the detail of Core Policy 2, which promotes the principles of sustainable design and construction in the new development, in accordance with the London Plan. However, to fully reflect policies 4A.3 and 4A.7 of the London Plan, the following wording (from Policy 4A.7) should be added to the end of Core Policy 2. '..... 20% through on site renewable energy generation (which can include sources of decentralised renewable energy) unless it can be demonstrated that such provision is not feasible'.
Adapting to the impacts of climate change	4.3	Ms Anna Chapman	Planner British Waterways-London Region	4.3.8 British Waterways objects to the current wording of paragraph 4.3.8. Buffer zones should not be required adjacent to the River Lee Navigation as a blanket policy. BW acknowledges that the River Lee Navigation is a wildlife corridor with a designation as a Green Chain and Site of Metropolitan Importance for Nature Conservation. This does not however mean that the adjoining land should be treated as though it is also designated in this manner. Through appropriate landscaping and the incorporation of green and/or brown roofs sufficient ecological enhancements of waterside sites can usually be provided within a scheme without a need for a buffer to the waterside. In some cases waterside buffer zones are appropriate for waterside sites. However, in many cases they preclude the efficient use of previously developed land and the ability of development to fully embrace with and integrate with the canal and therefore the requirement for a buffer zone can result in a development being contrary to policies 4C.12 and 4C.20 of the London Plan. British Waterways is responsible for the maintenance of the River Lee Navigation and is happy to carry out maintenance from the water, should development be up to

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				the canal edge. This is a typical arrangement along the canals and river navigations as a result of the industrial heritage, which has left a legacy of buildings being built up sheer out of the canal wall. As far as British Waterways is aware the Environment Agency's request for a buffer zone is an aspirational request rather than a statutory requirement. BW therefore questions the legitimacy of the Environment Agency requiring a blanket policy for a buffer zone to all waterside sites.
Adapting to the impacts of climate change	4.3	Ms Karen Foster-	Planning Liaison Officer Environment Agency	4.3.2 – 4.3.12 – This section needs to be updated to ensure that its wording is PPS25 compliant and that it includes the key policy outputs from your SFRA and that it cross-refers to the need to achieve the key goals of the Thames Catchment Flood Management Plan which are: · Use the Sequential Test to locate new development in least risky areas, and adopt a sequential approach to site design seeking opportunities to reduce risk. · Build resilience into a site's design. · Ensure the development is designed to be resilient to impacts of climate change. · Ensure that redevelopment behind defences reduces residual flood risk. · Ensure development is 'Safe' as defined in your SFRA. · Identify opportunities for river restoration to make space for water and provide improved flood storage, look at opportunities to set development back from rivers. · Assess condition of existing flood risk management assets and if needed renew so that its lifetime is commensurate with lifetime of the development. · Implement Sustainable Urban Drainage Systems. · Maximise the remaining life of the flood conveyance system to provide some management of the probability of fluvial events. · Look at opportunities for developer funding for flood risk management schemes.
Adapting to the impacts of climate change	4.3	Ms Karen Foster-	Planning Liaison Officer Environment Agency	4.3.2 – This section lacks detail, flood risk is one of the major constraints to development in Enfield and this issue is only going to get worse with climate change. This section needs to make reference to the need for new development to comply with the Thames Region Catchment Flood Management Plan, and the Lee Flood Risk Management Strategy. This section needs to also make reference to the need to use the Sequential Test to help locate new development in areas at least risk of flooding. SUDS systems also need to be highlighted as an important means of reducing flood risk.
Adapting to the impacts of climate change	4.3	Ms Karen Foster-	Planning Liaison Officer Environment Agency	4.3.3 – The second sentence does not make sense, PPS25 does not state 'not harmful impacts', PPS25 talks about using a sequential approach to site allocation so that new development is located in the right location in accordance with Table D3 of PPS25.
Adapting to the impacts of climate change	4.3	Ms Karen Foster-	Planning Liaison Officer Environment Agency	4.3.4 – This section is misleading as it fails to mention the areas of Montagu Road and the Eely estate which were flooded significantly in recent years. It is not clear why this is not mentioned but the Lee flood relief channel is. It is also unclear why other sources of flooding which you have mapped in your SFRA have not been mentioned as Enfield has flooded from other non-river sources.

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Adapting to the impacts of climate change	4.3	Ms Karen Foster-	Planning Liaison Officer Environment Agency	4.3.6 – First sentence needs updating as the Level 1 SFRA is complete. Please replace word ‘abatement’ with ‘mitigation’, as ‘abatement’ does not mean anything in flood risk terms and the word ‘mitigation’ fits in with PPS25. As stated previously PPS25 does not utilise the ‘precautionary approach’ this should be replaced with ‘risk based’. This section should cross-refer to the Thames Catchment Flood Management Plan which sees the sequential test and making space for water (e.g. SUDS, river restoration, setting development back from rivers) as the basic means for reducing flood risk in the borough.
Adapting to the impacts of climate change	4.3	Ms Karen Foster-	Planning Liaison Officer Environment Agency	4.3.7 – This section should also refer to the need to safeguard sufficient space for the Salmons Brook flood alleviation scheme to be undertaken by the EA. 4.3.7 – 4.3.11 – This section should also look at flood resilience and resistance measures in both existing and new developments as these techniques will enable new development to be designed to withstand the impacts of climate change, and could be retrofitted to existing developments. We support the section regarding buffer zones next to watercourses.
Adapting to the impacts of climate change	4.3	Mr Stephen Wilkinson	Head of Planning and Regeneration Lee Valley Regional Park Authority	The Authority supports the various measures and mechanisms that are described for reducing flood risk in particular through -the promotion of appropriate design and construction with features such as sustainable drainage and rainwater harvesting, management of surface water run-off and use of permeable surfaces -requirement for buffer zones beside water courses to ensure adequate access for flood defence which will also have a biodiversity role -identifying the appropriate location for the creation of new floodplains, restoration of natural floodplains or river courses and use of open spaces in floodplains for the attenuation of flood water and -identifying opportunities for naturalising watercourses, removing culverts and river restoration will be assessed as part of development proposals
CORE POLICY 3: FLOODING	Preferred Option	Mr Andrzej Warhaftig	Business Manager Enterprise Enfield	We support Core Policy 3
CORE POLICY 3: FLOODING	Preferred Option	Mr Mark Hayes	The Chair Enfield Housing Association Forum	CORE POLICY 3 An innovative approach to design in areas of flood risk could maximise housing and infrastructure provision in areas that will otherwise remain underutilised and problematic.
CORE POLICY 3: FLOODING	Preferred Option	Mr Mark Matthews	Thames Water Property	Thames Water agrees that the Core Strategy should have a policy preventing most forms of development from being built in the flood plain. However we suggest that in accordance with PPS25 that the policy also makes reference to the fact that essential utility infrastructure is often located in the floodplain and there may be requirements for additional infrastructure development within areas of high flood risk. We also consider that sewer flooding should be listed as one of the forms of flooding; again this is line with PPS25.

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CORE POLICY 3: FLOODING	Preferred Option	James Stevens	Regional Planner (London) Home Builders Federation Ltd	This is far too vague as a policy. This and the supporting text needs to describe how the council will manage development without jeopardising housing delivery. It needs to describe how it will assess risk and what contingency options it will put in place should sites it has allocated for development prove too prone to flood risk. What are the alternatives?
CORE POLICY 3: FLOODING	Preferred Option	Mr Chris Baker	Government Office for London	This seems to be a duplication of PPS25 and the London Plan. In any case, it is largely a DC policy.
CORE POLICY 3: FLOODING	Preferred Option	Ms Karen Foster-	Planning Liaison Officer Environment Agency	This core policy is not worded very strongly and needs strengthening to ensure that new development is located in areas at least risk of flooding and complies fully with PPS25. This policy also utilises wording from PPG25 which is no longer the current guidance on development and flood risk, the government no longer uses the 'precautionary principle', instead this has been replaced with a 'risk based approach'. The core policy needs lengthening to cover the wide range of forms of flood risk present in your Borough.
CORE POLICY 3: FLOODING	Preferred Option	Mr Dominic Coath	Natural England	This policy could be expanded and strengthened to incorporate elements of the implementation section of this policy. For example, 'the Council will expect to see proposals for waterway/floodplain restoration, SUDS etc, that are commensurate with the size and nature of the development and its level of flood risk.'
CORE POLICY 3: FLOODING	Preferred Option	Duncan Bennett (CgMs Consulting)	Senior Associate Director Fairview New Homes Ltd	Fairview New Homes objects to the wording of Core Policy 3. The policy as currently worded is vague and overly restrictive against development within areas at risk from flooding. PPS25 does not introduce a blanket restriction against development within areas subject to flood risk and allows for such development in certain locations where flood mitigation and prevention measures are employed. It is considered that Core Policy 3 should be re-worded to more closely follow the principles set out in PPS25.
CORE POLICY 3: FLOODING	Preferred Option	Mr Giles Dolphin	Planning Decisions Manager Greater London London Authority	Objection: The intent of this policy is welcomed but the current wording does not fully reflect the requirements of London Plan policies 4A.12, 4A.13, 4A.14 and 4A.15 where relevant. The omission of these requirements from Core Policy 3 would significantly harm the implementation of the London Plan. The policy should promote a risk based precautionary and sequential approach to flood management, clearly setting out the Council's approach to implementing the findings of the SFRA and to the management of flood risk in the Borough. The policy should also make reference to sustainable drainage and the drainage hierarchy in Policy 4A.14. The intension to include supplementary sustainable drainage design advice in the proposed 'Enfield Design Guide' SPD is welcomed.

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CORE POLICY 4: MANAGING HEAT ISLAND EFFECTS AND PRESSURES ON WATER RESOURCES	Preferred Option	Mr Andrzej Warhaftig	Business Manager Enterprise Enfield	We support Core Policy 4
CORE POLICY 4: MANAGING HEAT ISLAND EFFECTS AND PRESSURES ON WATER RESOURCES	Preferred Option	Mr Mark Hayes	The Chair Enfield Housing Association Forum	CORE POLICY 4 This could be strengthened by reference to grey water and pro-active design intervention in new development
CORE POLICY 4: MANAGING HEAT ISLAND EFFECTS AND PRESSURES ON WATER RESOURCES	Preferred Option	Mr Mark Matthews	Thames Water Property	As explained in detail below, we would welcome a specific policy on water use, water supply and water quality, which covers all development, and supports water efficiency measures alongside new water resources. We would also welcome a policy supporting utility infrastructure generally. Paragraphs B3 to B8 of PPS12 place specific emphasis on the need to take account of water supply and sewerage infrastructure in preparing Local Development Documents. Paragraph B3 in particular states: "The provision of infrastructure is important in all major new developments. The capacity of existing infrastructure and the need for additional facilities should be taken into account in the preparation of all local development documents. Infrastructure here includes water supply and sewers, waste facilities...." To meet the test of "soundness" as set out in PPS12 it is essential that the LDF does consider such water and sewerage infrastructure. In December 2005 The Planning Inspectorate published "Development Plans Examination – A Guide to the Process of Assessing the Soundness of Development Plan Documents". The Guide sets out a series of 'key questions and evidence requirements' at section 1.4, which aims to provide a framework for the assessment of 'soundness' of DPDs. The most relevant key question under Conformity Test iv (a) is: "Key Question - Has adequate account been taken of the relationship between the proposals in the DPD and other requirements, such as those of utility companies and agencies providing services in the area including their future plans or strategy and any requirements for land and premises, which should be prepared in parallel?" A key source of evidence which is identified in answering this question is: "Evidence - of particular significance, will be representations from bodies that consider that the DPD either does or does not have sufficient regard to other relevant strategies for which they are responsible". There are also relevant key sources of evidence identified in answering Coherence Test number (vii). The sources of evidence are: "If the DPD is a Core Strategy, the following documents, amongst other evidence, may be relevant:infrastructure providers' investment programmes and strategies; environmental programmes etc." Statutory water and sewage undertakers'

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				<p>investment programmes are based on a 5-year cycle, known as the Asset Management Plan (AMP) process. We are currently in the AMP4 period, which runs from 1st April 2005 to 31st March 2010, and this therefore does not cover all of the Enfield LDF plan period. As part of our five year business plan review Thames Water advise OFWAT on the funding required to accommodate growth in our networks and at all our treatment works. As a result we base our investment programmes on development plan allocations, which form the clearest picture of the shape of the community (as mentioned in PPS12 paragraph B6). This relates to all new development and not only the 'major' development proposals. We require a three to five year lead in time for provision of the extra capacity. Where a complete new water or sewage treatment works is required the lead in time can be between five to ten years. New development may therefore need to be phased to allow the prior completion of the necessary infrastructure. Regarding the funding of water and sewerage infrastructure, it is our understanding that Section 106 Agreements cannot be used to secure water and waste water infrastructure upgrades. However, it is essential to ensure that such infrastructure is in place to avoid unacceptable impacts on the environment such as sewage flooding of residential and commercial property, pollution of land and watercourses, and water shortages with associated low pressure water supply problems. When developers consider soft landscaping Thames Water need to ensure that the planting of shrubs and trees do not damage our pipes and mains, in order to help avoid main bursts or sewer leaks. Water and sewerage undertakers have limited powers under the Water Industry Act to prevent connection ahead of infrastructure upgrades and therefore rely heavily on the planning system to ensure infrastructure is provided ahead of development either through phasing or the use of Grampian style conditions. It is essential that developers demonstrate that adequate capacity exists both on and off the site to serve the development and that it would not lead to problems for existing users. In some circumstances this may make it necessary for developers to carry out appropriate studies to assert whether the proposed development will lead to overloading of existing water and sewerage infrastructure. Where there is a capacity problem and no improvements are programmed by the statutory undertaker, then the developer needs to contact the undertaker to agree what improvements are required and how they will be funded prior to any occupation of the development. It will therefore be essential that the Core Strategy makes reference to the provision of adequate water and sewerage infrastructure to service all new development and not only 'major' development to avoid unacceptable impacts on the environment (such as sewage flooding of residential and commercial property). Therefore, if the Core Strategy is to meet the "soundness" test, then it is considered that the Policy should be included in the Core Strategy:- "Water Use, Supply and Quality: "Water conservation – All new developments should incorporate water conservation and water efficiency measures, which as a minimum meet the standards set out in the Code for Sustainable Homes. Water and sewerage infrastructure - Planning permission will only be granted for developments which increase the demand for off-site service infrastructure where: 1. sufficient capacity already exists or 2. extra capacity can be provided in time to serve the development which will ensure that the environment and the amenities of local residents are not adversely affected. When there is a capacity problem and improvements in off-site infrastructure are not programmed, planning permission will only be granted where the developer funds</p>

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				<p>appropriate improvements which will be completed prior to occupation of the development.” Sub-text along the following lines should be added to the Core Strategy to support the above proposed Policy: “The Council will seek to ensure that water conservation measures are incorporated into new developments wherever feasible. The Council will also seek to ensure that there is adequate water supply, surface water, foul drainage and sewerage treatment capacity to serve all new developments. Developers will be required to demonstrate that there is adequate capacity both on and off the site to serve the development and that it would not lead to problems for existing users. In some circumstances this may make it necessary for developers to carry out appropriate studies to assert whether the proposed development will lead to overloading of existing infrastructure. Where there is a capacity problem and no improvements are programmed by the statutory undertaker, the Council will require the developer to fund appropriate improvements which must be completed prior to occupation of the development.” It is considered that the above policy and supporting text accords with the guidance referred to above in PPS12 and the London Plan (Policies 4A.16,17 & 18), as well as being inline with the Core Strategy Sustainability Appraisal. Paragraph B6 of PPS12 states that in preparing Local Development Documents, authorities should consider both the requirements of the utilities for land to enable them to meet the demands that will be placed upon them and the environmental effects of such additional uses. As stated above, this is particularly relevant for Thames Water where our sites may require future development and expansion to meet environmental, social and economic change, standards specifically those posed by population and economic growth, tighter environmental standards and from the impacts of climate change. In terms of water supply, demand side measures alone will not be sufficient to meet the future demand for water. Provision will be required for additional water resources if Thames Water is to maintain acceptable supplies to its customers, particularly in dry years. Hence, a further new policy should be included in the LDF Core Strategy as follows: Proposed new policy:- “Utilities Development: The development or expansion of water supply or waste water facilities will normally be permitted, either where needed to serve existing or proposed development in accordance with the provisions of the Development Plan, or in the interests of long term water supply and waste water management, provided that the need for such facilities outweighs any adverse land use or environmental impact that any such adverse impact is minimised.” It is considered that the above policy and supporting text accords with the guidance referred to above in PPS12 and the London Plan policies 94A16, 17 & 18).</p>
CORE POLICY 4: MANAGING HEAT ISLAND EFFECTS AND PRESSURES ON WATER RESOURCES	Preferred Option	James Stevens	Regional Planner (London) Home Builders Federation Ltd	<p>It is unreasonable to argue that there are no alternatives to this policy. If the measures the council proposes to adopt to mitigate these climate change developments prove too expensive (along with other conditions and obligations) impacting upon site viability and in turn jeopardising Enfield’s housing trajectory, what measures will it adopt along with developers to surmount these obstacles? For example, maybe it would be more appropriate (not to add humane) to develop areas of Enfield’s greenbelt to improve the environmental quality of residents and to counter the urban heat island effect, rather than ramping up densities in the town centres?</p>

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CORE POLICY 4: MANAGING HEAT ISLAND EFFECTS AND PRESSURES ON WATER RESOURCES	Preferred Option	Mr Chris Baker	Government Office for London	This appears to be an unnecessary policy, which would be very difficult to measure in terms of the annual monitoring report.
CORE POLICY 4: MANAGING HEAT ISLAND EFFECTS AND PRESSURES ON WATER RESOURCES	Preferred Option	Ms Karen Foster-	Planning Liaison Officer Environment Agency	The standard of environmental performance must be part of any proposals for accelerating housing growth. The environmental performance of existing housing stock must also be addressed. It should also make reference to strategic planning of water resources in line with section 4.3.18 and the North London Sub Regional Framework which states "Water – Local supply infrastructure may need re-enforcement subject to nature of proposals. Existing water supply infrastructure is unlikely to be able to support the demand from this development; this means that developers will need to undertake a study to ascertain the impacts on existing water supply infrastructure. All reasonable measures should be taken to reduce demand and should be implemented".
CORE POLICY 4: MANAGING HEAT ISLAND EFFECTS AND PRESSURES ON WATER RESOURCES	Preferred Option	Mr Giles Dolphin	Planning Decisions Manager Greater London Authority	Objection: The intent of this policy is welcomed but it currently confuses two separate policy issues and does not adequately reflect the relevant policies of London Plan, thereby potentially causing significant harm to the implementation of the London Plan. The core strategy should be revised to include two distinct policies covering adaptation to climate change and overheating; and the efficient use of water. The intension to include supplementary design advice on these issues in the proposed 'Enfield Design Guide' SPD is welcomed. The references to the London Plan should be updated.
Protecting and enhancing environmental quality	4.4	Mr Mark Matthews	Thames Water Property	As explained in detail below, we would welcome a specific policy on water use, water supply and water quality, which covers all development, and supports water efficiency measures alongside new water resources. We would also welcome a policy supporting utility infrastructure generally. Paragraphs B3 to B8 of PPS12 place specific emphasis on the need to take account of water supply and sewerage infrastructure in preparing Local Development Documents. Paragraph B3 in particular states: "The provision of infrastructure is important in all major new developments. The capacity of existing infrastructure and the need for additional facilities should be taken into account in the preparation of all local development documents. Infrastructure here includes water supply and sewers, waste facilities...." To meet the test of "soundness" as set out in PPS12 it is essential that the LDF does consider such water and sewerage infrastructure. In December 2005 The Planning Inspectorate published "Development Plans Examination – A Guide to the Process of Assessing the Soundness of Development Plan Documents". The Guide

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				<p>sets out a series of 'key questions and evidence requirements' at section 1.4, which aims to provide a framework for the assessment of 'soundness' of DPDs. The most relevant key question under Conformity Test iv (a) is: "Key Question - Has adequate account been taken of the relationship between the proposals in the DPD and other requirements, such as those of utility companies and agencies providing services in the area including their future plans or strategy and any requirements for land and premises, which should be prepared in parallel?" A key source of evidence which is identified in answering this question is: "Evidence - of particular significance, will be representations from bodies that consider that the DPD either does or does not have sufficient regard to other relevant strategies for which they are responsible". There are also relevant key sources of evidence identified in answering Coherence Test number (vii). The sources of evidence are: "If the DPD is a Core Strategy, the following documents, amongst other evidence, may be relevant:infrastructure providers' investment programmes and strategies; environmental programmes etc." Statutory water and sewage undertakers' investment programmes are based on a 5-year cycle, known as the Asset Management Plan (AMP) process. We are currently in the AMP4 period, which runs from 1st April 2005 to 31st March 2010, and this therefore does not cover all of the Enfield LDF plan period. As part of our five year business plan review Thames Water advise OFWAT on the funding required to accommodate growth in our networks and at all our treatment works. As a result we base our investment programmes on development plan allocations, which form the clearest picture of the shape of the community (as mentioned in PPS12 paragraph B6). This relates to all new development and not only the 'major' development proposals. We require a three to five year lead in time for provision of the extra capacity. Where a complete new water or sewage treatment works is required the lead in time can be between five to ten years. New development may therefore need to be phased to allow the prior completion of the necessary infrastructure. Regarding the funding of water and sewerage infrastructure, it is our understanding that Section 106 Agreements cannot be used to secure water and waste water infrastructure upgrades. However, it is essential to ensure that such infrastructure is in place to avoid unacceptable impacts on the environment such as sewage flooding of residential and commercial property, pollution of land and watercourses, and water shortages with associated low pressure water supply problems. When developers consider soft landscaping Thames Water need to ensure that the planting of shrubs and trees do not damage our pipes and mains, in order to help avoid main bursts or sewer leaks. Water and sewerage undertakers have limited powers under the Water Industry Act to prevent connection ahead of infrastructure upgrades and therefore rely heavily on the planning system to ensure infrastructure is provided ahead of development either through phasing or the use of Grampian style conditions. It is essential that developers demonstrate that adequate capacity exists both on and off the site to serve the development and that it would not lead to problems for existing users. In some circumstances this may make it necessary for developers to carry out appropriate studies to assert whether the proposed development will lead to overloading of existing water and sewerage infrastructure. Where there is a capacity problem and no improvements are programmed by the statutory undertaker, then the developer needs to contact the undertaker to agree what improvements are required and how they will be funded prior to any occupation of the development. It will therefore be essential</p>

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				<p>that the Core Strategy makes reference to the provision of adequate water and sewerage infrastructure to service all new development and not only 'major' development to avoid unacceptable impacts on the environment (such as sewage flooding of residential and commercial property). Therefore, if the Core Strategy is to meet the "soundness" test, then it is considered that the Policy should be included in the Core Strategy:- "Water Use, Supply and Quality: "Water conservation – All new developments should incorporate water conservation and water efficiency measures, which as a minimum meet the standards set out in the Code for Sustainable Homes. Water and sewerage infrastructure - Planning permission will only be granted for developments which increase the demand for off-site service infrastructure where: 1. sufficient capacity already exists or 2. extra capacity can be provided in time to serve the development which will ensure that the environment and the amenities of local residents are not adversely affected. When there is a capacity problem and improvements in off-site infrastructure are not programmed, planning permission will only be granted where the developer funds appropriate improvements which will be completed prior to occupation of the development." Sub-text along the following lines should be added to the Core Strategy to support the above proposed Policy: "The Council will seek to ensure that water conservation measures are incorporated into new developments wherever feasible. The Council will also seek to ensure that there is adequate water supply, surface water, foul drainage and sewerage treatment capacity to serve all new developments. Developers will be required to demonstrate that there is adequate capacity both on and off the site to serve the development and that it would not lead to problems for existing users. In some circumstances this may make it necessary for developers to carry out appropriate studies to assert whether the proposed development will lead to overloading of existing infrastructure. Where there is a capacity problem and no improvements are programmed by the statutory undertaker, the Council will require the developer to fund appropriate improvements which must be completed prior to occupation of the development." It is considered that the above policy and supporting text accords with the guidance referred to above in PPS12 and the London Plan (Policies 4A.16,17 & 18), as well as being inline with the Core Strategy Sustainability Appraisal. Paragraph B6 of PPS12 states that in preparing Local Development Documents, authorities should consider both the requirements of the utilities for land to enable them to meet the demands that will be placed upon them and the environmental effects of such additional uses. As stated above, this is particularly relevant for Thames Water where our sites may require future development and expansion to meet environmental, social and economic change, standards specifically those posed by population and economic growth, tighter environmental standards and from the impacts of climate change. In terms of water supply, demand side measures alone will not be sufficient to meet the future demand for water. Provision will be required for additional water resources if Thames Water is to maintain acceptable supplies to its customers, particularly in dry years. Hence, a further new policy should be included in the LDF Core Strategy as follows: Proposed new policy:- "Utilities Development: The development or expansion of water supply or waste water facilities will normally be permitted, either where needed to serve existing or proposed development in accordance with the provisions of the Development Plan, or in the interests of long term water supply and waste water management, provided that the need for such facilities outweighs any adverse land use or</p>

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				environmental impact that any such adverse impact is minimised." It is considered that the above policy and supporting text accords with the guidance referred to above in PPS12 and the London Plan policies 94A16, 17 & 18).
Protecting and enhancing environmental quality	4.4	Mr Giles Dolphin	Planning Decisions Manager Greater London Authority	Comment: Bio-remediation technologies can reduce the mass and hazardousness of contaminated soils, therefore effective site waste management planning can enable a proactive approach (often on-site) to developments on contaminated land, in line with London Plan Policy 4A.33. This should be reflected in paragraphs 4.4.8 and 4.4 15. Comment: There is a typing error in paragraph 4.4.22. The word 'encourage' is missing from ...minimise the movement of aggregates by road and encourage their movement by water. Comment: This section could include a proposal to encourage the development of sites which produce secondary aggregates from materials such as glass (e.g. Day aggregates).
CORE POLICY 5: AIR, WATER, NOISE AND LIGHT POLLUTION AND CONTAMINATED LAND	Preferred Option	Mr Andrzej Warhaftig	Business Manager Enterprise Enfield	We support Core Policy 5
CORE POLICY 5: AIR, WATER, NOISE AND LIGHT POLLUTION AND CONTAMINATED LAND	Preferred Option	Mr Mark Hayes	The Chair Enfield Housing Association Forum	CORE POLICY 5 This policy should be strengthened by the development of a bioremediation strategy.

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CORE POLICY 5: AIR, WATER, NOISE AND LIGHT POLLUTION AND CONTAMINATED LAND	Preferred Option	Mr Chris Baker	Government Office for London	Similar comments as for Core Policy 4 apply. This is clear example of the sort of generalised non-locally distinctive policy that Inspectors would be likely to delete.
CORE POLICY 5: AIR, WATER, NOISE AND LIGHT POLLUTION AND CONTAMINATED LAND	Preferred Option	Ms Karen Foster-	Planning Liaison Officer Environment Agency	Water Framework Directives - specific objectives for each water body will not be formalised until 2009. However, planning bodies and authorities need to think now about the implications of proposed development and land use change on water, including beyond their local authority boundary. Policies can be put in place now (using the development plan and emerging work on River Basin Management Plans (RBMPs) as a starting point) that will reduce the impact of development on the water environment, maintain water quality, ensure adequate water resources and promote sustainability in water use. Focusing on the principles of sustainable water management will pave the way for success in meeting WFD objectives and help deliver a high quality local environment. Local Planning Authorities and regional planning bodies can help to deliver Water Framework Directive objectives in the first WFD cycle by:- · Identifying the water management issues that are relevant to spatial planning - planning policies should influence the design and location of new development to ensure it does not create adverse pressures on the water environment that could compromise our ability to meet WFD objectives. · Including policies on sustainable water management in their development plans – including policies in RSSs (strategic policies), LDFs (core policies referring to the WFD by 2007) and LDPs (area wide policies that can address emerging WFD issues). In drawing up such policies, the bodies should think about the implications of proposed development beyond their boundaries. · Helping to ensure that understanding of the pressures of, and opportunities for, development are reflected in the analysis underpinning RBMPs. · Ensuring that spatial plans complement RBMPs · Reviewing plans on publication of RBMPs to ensure that they contribute towards, and do not compromise the achievement of, WFD objectives. · Using established mechanisms for community involvement and communication.

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CORE POLICY 5: AIR, WATER, NOISE AND LIGHT POLLUTION AND CONTAMINATE D LAND	Preferred Option	Mr Patrick Blake	Network Strategy Highways Agency	In respect of air quality in the vicinity of the SRN, either within or outside the boundaries of your planning authority, the HA will need to consider whether development within the Local Development Framework (LDF) will cause a compliance problem from 2010 or make an existing forecast compliance problem worse. If this situation arises the HA may also need to consider whether to make representations in respect of the legality of the proposals and the soundness of the LDF. It is understood that the forthcoming Development Management Document will set out the Council's approach to considering the impacts of development proposals on air quality. Whilst the HA welcomes this approach, we are concerned that the cumulative impact of development in the Borough on air quality should be assessed. We therefore suggest that your Sustainability Appraisal should contain evidence outlining the effect of LDF development on air quality, with particular reference to Directive 1999/30. Alternatively, the Development Management Document could set out requirements for developers to undertake Air Quality Assessments which consider not only their impact on the SRN, but also take into account the cumulative air quality impacts of other developments in the area.
CORE POLICY 5: AIR, WATER, NOISE AND LIGHT POLLUTION AND CONTAMINATE D LAND	Preferred Option	Ms Vilna Walsh (First Plan)	Director National Grid Property Holdings	National Grid support the main thrust of Core Policy 5. However, it is considered important that in the application of this policy due regard is had to the guidance provided in PPS23 and in particular that found at Annex 2 (Development on land affected by contamination) Paragraph 2.42 which states that: "Where contamination is known or suspected or the proposed use would be particularly vulnerable, LPAs should require the applicant to provide with the application such information as is necessary to determine whether the proposed development can proceed. In doing so, they should adopt a balanced approach. It would be disproportionate and unnecessary to require every applicant to carry out a detailed and expensive site investigation. However, sufficient information should be required to determine the existence or otherwise of contamination, its nature and the risks it may pose and whether these can be satisfactorily reduced to an acceptable level." The re-use of brownfield sites is key objective running through government policy and the London Plan. The principle of sustainable development means that where practicable, brownfield sites, including those affected by contamination, should be recycled into new uses. Importantly re-use of such land can provide opportunities to deal with any threats posed by contamination to health and the environment. In dealing with sites which give rise to issue of contamination the supporting text to the policy should confirm the following: In accordance with PPS23 a balanced approach will be adopted in determining the appropriate and necessary extent of site investigation required in support of planning applications for proposals on contaminated land.

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CORE POLICY 5: AIR, WATER, NOISE AND LIGHT POLLUTION AND CONTAMINATED LAND	Preferred Option	Mr Giles Dolphin	Planning Decisions Manager Greater London Authority	Support with conditions: The intent of the policy is welcomed and it is supported subject to all comments below being fully reflected in the submission version of the core strategy. The Council should consider revising the start of the policy to read: "The Council, working with its partners, will seek to prevent environmental problems and to secure reductions..." The reference to air pollution in the policy and in the supporting text is supported. The reference to light pollution in the policy is supported from a biodiversity perspective.
CORE POLICY 5: AIR, WATER, NOISE AND LIGHT POLLUTION AND CONTAMINATED LAND	Preferred Option	Mr Giles Dolphin	Planning Decisions Manager Greater London Authority	Comment: The reference to noise pollution is supported but the policy does not fully reflect all of the noise issues raised in London Plan Policy 4A.20. A specific policy fully reflecting London Plan Policy 4A.20 should be included in the Core Strategy or other suitable DPD. This could be in the proposed Development Management Document as suggested in paragraph 4.4.10, provided that it were a DPD. The supporting text in paragraphs 4.4.6 and 4.4.13 is welcome.
CORE POLICY 6: AGGREGATES	Preferred Option	Mr Andrzej Warhaftig	Business Manager Enterprise Enfield	We support Core Policy 6
CORE POLICY 6: AGGREGATES	Preferred Option	Mr Mark Matthews	Thames Water Property	The level of aggregates in the Lea Valley Reservoirs is unknown. However we support Core Policy 6 in relation to the better use of aggregates, including through the protection of the Lea Valley Reservoirs.
CORE POLICY 6: AGGREGATES	Preferred Option	Mr Chris Baker	Government Office for London	This policy simply "supports" the better use of aggregates and provides less detail than the relevant London Plan policies (4A.30 - 4A.32). Unless it is to include some locally specific detail, there is no point in including the policy.
CORE POLICY 6: AGGREGATES	Preferred Option	Mr Dominic Coath	Natural England	As the Council has identified, the use of the King George V Reservoir for future aggregate extraction needs careful consideration and close consultation with Natural England because of potential impacts on the SSSI.
CORE POLICY 6: AGGREGATES	Preferred Option	Mr Stephen Wilkinson	Head of Planning and Regeneration Lee Valley Regional Park Authority	The Authority objects to inclusion of King George V reservoir in the draft strategy for gravel dredging given the likely adverse impact on its SSSI designation and the Special Protection Area.

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CORE POLICY 6: AGGREGATES	Preferred Option	Mr Giles Dolphin	Planning Decisions Manager Greater London Authority	Support with conditions: The intent of the policy is welcomed and it is supported subject to all comments below being fully reflected in the submission version of the core strategy. In order to ensure general conformity with London Plan Policy 4A.31 the Council should revise the wording of the policy to explicitly include the specific requirements of policy 4A.31.
Waste management	4.5	Mr Mark Hayes	The Chair Enfield Housing Association Forum	CORE POLICIES 7 & 8 The proximity of road, rail and waterway transport links in the Lee Valley, together with major development opportunities, provides a major opportunity to develop business and employment generating activities around waste management, processing and recycling. The relevant policies should be strengthened to reflect this opportunity.
Waste management	4.5	Mr Giles Dolphin	Planning Decisions Manager Greater London Authority	The preferred options document makes a number of welcome improvements to the approach to waste planning compared to the Issues and Options document, which sought derogate a number of waste planning matters to the joint waste DPD that is being prepared. However, the Preferred Option policies still fall short of the requirements of the London Plan. In particular the Submission document should refer to; the Mayor's self-sufficiency targets, the Mayor's hierarchy for energy from waste and the actual apportionment for Enfield.
CORE POLICY 7: DELIVERING SUSTAINABLE WASTE MANAGEMENT	Preferred Option	Mr Andrzej Warhaftig	Business Manager Enterprise Enfield	We support the Core Option 7, and believe that we should plan for over capacity, which may mean having the ability to import waste for a period. There needs to be a separate and higher emphasis on business waste.
CORE POLICY 7: DELIVERING SUSTAINABLE WASTE MANAGEMENT	Preferred Option	Mr Mark Matthews	Thames Water Property	Sewage sludge (biosolids) is applied to a range of agricultural and other lands acting not only as a fertiliser, but also a soil improver. The recycling of biosolids to land is an excellent way to return nutrients to soils. It avoids the use of landfill, is sustainable and the Best Practicable Environmental Option (BPEO) in most cases. The national policy framework for sewage sludge disposal is outlined in the Waste Strategy 2007 for England (DEFRA, 2007) which states at paragraph Annex C6.3 that sewage sludge production is expected to rise to 1.6 million tonnes per year by 2010 due to more households being connected to the sewerage system and more stringent requirements for the treatment of sewage effluent. The Strategy goes on to state at Annex C6.9 that the recycling of sludge to land is the best practicable environmental option in most circumstances. In response to changing circumstances affecting the amount of sludge generated through population increases, the tightening of regulations and codes of practice governing the spreading of sludge to land, increasing environmental regulation of discharges to the River Thames and the planned improvements described above, additional treatment capacity within London both in the short to medium and the long term will be required. Thames

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				Water are currently preparing a Sludge Strategy and associated SEA to consider the requirements for additional sludge capacity in our catchment. Consultation on these documents will commence in the Spring, with a view for the documents to be adopted in the Summer of 2008. The initial results from our sludge strategy suggest it is almost certain that investment will be required in significant new recovery plant within London, potentially including new or upgraded sludge treatment facilities at Deephams STW. In conclusion, Thames Water would therefore like a policy in the Core Strategy supporting the upgrade of sludge treatment capacity at Deephams STW.
CORE POLICY 7: DELIVERING SUSTAINABLE WASTE MANAGEMENT	Preferred Option	Mr Patrick Blake	Network Strategy Highways Agency	The HA welcomes the proposals in Core Policy 7 to encourage the treatment of waste close to its source and to promote the sustainable transport of waste. To this end it is important that sites which offer the opportunity of transferring waste to sustainable modes (river and rail) are safeguarded. It is therefore recommended that Core Strategy policies should specify the need to safeguard appropriate sites and that any such sites should be identified in the forthcoming Site Specific Allocations DPD. This would be in line with Policy 4A.23 of the London Plan and would therefore ensure the plan is in line with PPS12 (paragraph 4.24) Tests of Soundness 4 and 7. We also refer you to our representations on the North London Waste Plan Issues and Options Report.
CORE POLICY 7: DELIVERING SUSTAINABLE WASTE MANAGEMENT	Preferred Option	Mr Giles Dolphin	Planning Decisions Manager Greater London Authority	Objection: The intent of this policy is welcomed but it currently fails to adequately reflect the relevant policies of London Plan. This policy should also clearly set out the Mayor's self-sufficiency and recycling targets, given in London Plan Policy 4A.21, and make reference to the Mayor's hierarchy for energy from waste 'recovery' options, set out in the Greenhouse Gas Balances of Waste Management Scenarios report. This policy should also set out opportunities to use recycled materials in developments in addition to providing recycling storage facilities.
CORE POLICY 7: DELIVERING SUSTAINABLE WASTE MANAGEMENT	Preferred Option	Mr Giles Dolphin	Planning Decisions Manager Greater London Authority	Comment: The London Plan targets given in paragraph 4.5.1 are incorrect. This paragraph should be updated to refer to the most recent version of the London Plan, Policy 4A.21. Paragraph 4.5.2 should include the apportionment figure for Enfield. The London Plan apportionment is for commercial and industrial waste as well as for municipal waste and therefore commercial and industrial waste data should be included alongside the municipal data. Comment: Paragraphs 4.5.2, 4.5.6 and 4.5.10 should clearly set out the respective roles of, and relationship between, the Borough's Core Strategy and the North London Waste Plan.
CORE POLICY 8: MAKING PROVISION FOR WASTE	Preferred Option	Mr Andrzej Warhaftig	Business Manager Enterprise Enfield	We support Core Policy 8

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CORE POLICY 8: MAKING PROVISION FOR WASTE	Preferred Option	Mr Chris Baker	Government Office for London	The second bullet includes the phrase "other waste categories, as appropriate". We assume that refers to construction, demolition and hazardous waste? If so, it would be useful to mention these in the policy. The same bullet also mentions "broad locations identified... London Plan". These should be identified (Great Cambridge Road etc) if the policy is to have any point, along with any other relevant details as identified in the evidence base. The joint waste plan could also be mentioned in this policy.
CORE POLICY 8: MAKING PROVISION FOR WASTE	Preferred Option	Mr Stephen Wilkinson	Head of Planning and Regeneration Lee Valley Regional Park Authority	Core Policy 8 seeks to ensure sufficient provision of well located waste facilities throughout the borough in line with the London Plan. The Authority resists the location of such facilities in the Regional Park. This approach is consistent with Authority's response to North London Waste Plan Issues and Options report, agreed at Planning Committee (28th February Paper P/318/08).
CORE POLICY 8: MAKING PROVISION FOR WASTE	Preferred Option	Mr Giles Dolphin	Planning Decisions Manager Greater London Authority	Objection: The intent of this policy is welcomed but it currently fails to adequately reflect the relevant policies of London Plan. The wording of the policy should be changed to: "The Council will ensure the provision...". The policy should make reference to the apportionment figure for the Enfield. The policy should include a requirement to designate and safeguard those waste management sites identified in the Borough by the North London Waste Plan. The policy should clearly set out criteria for the selection of sites for waste management and disposal, in line with London Plan Policy 4A.23 and include proposals for construction waste and hazardous waste in line with London Plan policies 4A.28 and 4A.29 respectively. The approach currently being adopted in the composition of the North London Waste DPD is of concern to the Mayor. The GLA strongly emphasises the need to have joint Core policies and DC policies to ensure the deliverability of facilities and the apportionment consistently amongst the seven boroughs. This will also avoid delays, costs at examination and transitional adoption stages of various borough documents and their validity in terms of new emerging data at the time of the NLWDPD being formally adopted.
Housing & People: the core policies	5	Enguang Lee	Planning Advisor Fairview New Homes Ltd	In terms of Core Policy 10: Housing, we welcome the acknowledgement that 'opportunities for housing growth will be considered in areas with high public transport accessibility'. However, we do not consider that the Council should work towards an indicative target of 395 homes per annum according to London Plan Policy, the Borough must seek to exceed set targets and not use them as a means of rationing.

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Housing & People: the core policies	5	Mr Stuart Slatter (Planning Potential)	Planning Consultant Diocese of London	<p>Enfield Housing Requirements: Enfield is identified, amongst others, as a Borough that should make a major contribution to housing land supply. It is acknowledged by the Council that there is currently insufficient large sites of suitable land available to meet this aim. The initial Mayors London Plan 2004 required 13,180 additional homes in Enfield between the years 1997-2017. This number was to comprise 11,180 self-contained dwellings and 2,000 household spaces in new non self-contained bed spaces. Annually this equated to 559 self-contained dwellings and 100 non self-contained bed spaces per year. Due to changed estimates of available housing land within the Enfield Borough, the Mayors 2004 Housing Capacity Study found the initial targets for Enfield were unlikely to be achievable due to a lack of available sites, and subsequently put forward a requirement for a reduction to 3,950 self contained units between the years 2007 and 2017; this equates to 395 additional dwellings per year. These new targets were incorporated into the Alterations to the Mayors London Plan at the close of 2006. The Councils Housing Needs Survey states there is a shortfall in the number of family sized dwellings available as market housing, and that there is also a need for affordable housing of all sizes. Enfield Housing Strategy 2005 to 2010 states that the Borough is ranked in the worst 6% for overcrowding in England and Wales with very expensive housing in the north west of the Borough with poorer, overcrowded areas to the east. Figure 1, overleaf [see attached file], shows the 2006 Enfield Borough Annual Monitoring Report Housing Trajectory, with past and projected number of dwelling completions between the years 1995 and 2017 with the current and past London Plan targets superimposed. Calculating the sum of annual completions shows that since 1997/98, 6,047 self-contained dwellings have been added – this is above past and future targets. In the annual period 2005/2006, 1,061 dwellings were completed, of these 35% were affordable and all dwellings were built on previously developed land. Enfield Housing Capacity: Enfield is specified within the London Housing Capacity Study 2004 as an area with a low, 'large housing site capacity (0.5ha+)'. Most new homes are predicted to come from small sites and conversion of existing buildings. Further, the Enfield Core Strategy Issues and Options document states that the Borough's housing capacity is limited by a current absence of large sites so other sources of supply need to be considered, balanced with the need to make adequate provision for local services and social infrastructure. The provision of suitable land to fulfil the 5 year rolling housing land supply is therefore likely to be a challenge for Enfield Borough Council – particularly in the years following 2012. Large sites provide excellent opportunity for sustainable development, and the Council should act to remove inappropriately restrictive policy protection from certain sites. This will help to take the pressure away from finding smaller – less suitable sites for residential development, which in all likelihood will not deliver ancillary infrastructure and plan objectives, by virtue of quantum and threshold. Housing Conclusions Enfield is making good progress towards meeting London Plan targets through to 2017. However, although Enfield is meeting the Mayors London Plan for housing, this is only because these targets were significantly lowered. Had this not occurred, Enfield Borough Council would not have met targets for housing completions to the year 2017. The Mayors decision to lower targets indicates low confidence in Enfield's housing capacity & deliverability, particularly from large sites. However, it should be considered that these housing targets are not maximums and additional housing provision – particularly in areas where demand outstrips</p>

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				supply, should be considered favourably. Local Planning policy and allocations should seek to exceed the London Plan targets and address the suitability of housing development in terms of location, type of development and impact on the locality. The identification of large sites will provide the opportunity to deliver infrastructure improvements which small scale sites would fail to deliver.
Housing & People: the core policies	5	Mr Giles Dolphin	Planning Decisions Manager Greater London Authority	Comment: The Core Strategy currently omits policies regarding provision for community and social infrastructure, notably those required by London Plan policies 3A.18 and 3A.19. Appropriate policies should be included to ensure general conformity.
Housing & People: the core policies	5	Mr Giles Dolphin	Planning Decisions Manager Greater London Authority	The approach to the spatial distribution of new housing supply is supported, as is the intention to build at densities that make the best use of land and have regard to public transport accessibility. However, there is no further guidance as to how appropriate densities will be assessed and as it stands the policy is too vague and open to different interpretations. The policy should include a reference to apply densities in accordance with the London Plan density matrix (unless the Council intends to set its own density ranges, in which case these should be clearly set out and justified through the evidence base). The Preferred Options policy for affordable housing represents a significant improvement on the Issues and Options document, in particular the 50% borough-wide target and 70:30 tenure split is welcomed. However, the wording could be improved to ensure clarity and consistency with the London Plan. The approach to lifetime homes and wheelchair housing would not be in general conformity with the London Plan, if carried through to Submission stage. The wording is too weak and would harm the implementation of this London Plan policy.
Introduction	5.1	Mr Peter O'Brien	Partnership Manager Learning Skills Council	We support a separate strategic objective for schools that pays reference to Building Schools for the Future. Failing this, we believe that objective 9 should be augmented with such a cross-reference
Introduction	5.1	Mr Mark Hayes	The Chair Enfield Housing Association Forum	Strategic Objectives for Housing (5.1.1) should be strengthened with a commitment to improving the sustainability of existing housing, recognising this will usually be achieved by refurbishment and upgrading, but may in some cases be achieved through re-provision (particularly in relation to poorly designed estates and high rise developments).

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Introduction	5.1	Mr John McGill	Deputy Director North London Strategic Alliance	Core policies within these strategic objectives, point 9, We suggest that there is a specific reference to leisure and also urban design and built facilities to promote physical activity. Also within this section, as noted above, there is no reference to the levels of buy to let within the borough which are understood to be quite high. This section should consider evidence about the effect of buy to let on local housing markets and local communities and whether there can be any policies which require developers to manage developments to at least control the levels of buy to let.
Introduction	5.1	Mr Giles Dolphin	Planning Decisions Manager Greater London Authority	Support: These six objectives are supported. Objective 7 regarding the wider determinants of health in the planning of new developments is welcomed from a transport perspective, given strategic aspirations to reduce car dependency and encouraging active travel.
Meeting housing requirements	5.2	Ms Anna Chapman	Planner British Waterways-London Region	British Waterways requests that the Housing Mix section of this chapter acknowledges the role of residential moorings as an alternative housing choice. The demand for boats for residential use is showing particularly strong demand. A survey of boat owners licensed to use BW waterways in 2004 suggests that 9% of all boats with long term moorings are used as the primary residence. Para 4.117 of the London Plan acknowledges the need for and the shortage in supply of residential moorings in London and Waterways and Development Plans states that although limited in number, residential moorings represent an element in the government's drive towards an increased choice in housing types providing for a variety of lifestyles. It is important therefore, that we achieve the right mix and variety of boats and uses to sustain a vibrant and dynamic inland waterways system.
Meeting housing requirements	5.2	Caroline Dawson (Planning Potential)	Director Kier Property Developments Ltd and the Ponders End Trust	Our clients support the Core Policy's aim to provide a "minimum" of 3,950 new homes, in line with the London Plan. Our clients also agrees with the Statement in Core Policy 10 that, to significantly exceed this target, new development will need to be brought forward in the Upper Lee Valley by a range of actions including the intensification of uses, promotion of mixed uses and some release of surplus employment land. In this context, the Ponders End Industrial Estate is an appropriate and logical site for a mixed use development contributing towards new housing provision and also a site which is immediately available for this form of development. The achievement of the Council's objectives and housing targets could, therefore, be promptly moved forward via a mixed use approach to our client's landholding. This approach would be compliant with the recognition in paragraph 5.2.16 that "a critical mass of new homes is needed in the Upper Lee Valley if sustainable communities are to be created". In line with the Core Strategy, the provision of new homes alongside jobs in the Upper Lee Valley at the Ponders End Industrial Estate would facilitate both employment and housing objectives and the creation of mixed community areas. Whilst it is noted in paragraph 5.2.18 that Area Action Plans will identify suitable sites for housing and mixed use development, the prompt delivery of both jobs and

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				housing should not, necessarily, wait for the final approval of AAPs. A mixed use approach to development and the avoidance of extensive areas of single use are key features of National Planning Policy and, consequently, there is no reason why planning consents for such an approach should not be granted prior to the approval of AAPs.
Meeting housing requirements	5.2	Duncan Bennett (CgMs Consulting)	Senior Associate Director Fairview New Homes Ltd	Fairview New Homes objects to the wording within this paragraph and specifically the statement that the Council will meet the current target by facilitating planning permissions for available, suitable and achievable sites identified in the Housing Capacity Study and through windfall sites. Paragraph 59 of PPS3 clearly states that allowances for windfalls should not be included in the first 10 years of land supply unless local planning authorities can provide robust evidence of genuine local circumstances that prevent specific sites being identified. The London Borough of Enfield needs to ensure that sufficient available, suitable and achievable sites are identified within the first 10 years of its housing trajectory.
Meeting housing requirements	5.2	David Phillips (GL Hearn)	Planning Director Hadley Homes	5.2: Meeting housing requirements with particular reference to paras. 5.2.14 to 5.2.19 and managing the supply of new housing and locations for new homes. The strategy for managing the supply of new housing and locations for new housing, set out under paras. 5.2.14 to 5.2.19, is inconsistent with national planning policy and is not based on a robust credible evidence base. <ul style="list-style-type: none"> • Having reviewed the Council's Housing Trajectory (Figure 5.1 of the Core Strategy and the latest Annual Monitoring Report 2006/07 (AMR) with reference to Figure 6.1 (a) and Figure 6.1 (b)), it is considered appropriate to undertake a conservative robust discounting exercise to exclude projected windfall allocations. This has identified a residual shortfall of 2,795 net new dwellings to accommodate the London Plan's minimum requirement of 3,950 dwellings in the plan period 2007/08 to 2017. • The Council's own Housing Trajectory is unrealistically optimistic and not based on a robust evidence base. A more realistic assessment of annualised supply is 115 units per annum (1,115 on the assumption that all Large Identified Sites referred to in Appendix 3 of the latest AMR can be delivered) which is 70% below the annualised minimum requirement and over 78% below the Council's projected annualised delivery. However, based on current best practice set out in PPS3, even these large sites should be excluded from the supply base where it can not be demonstrated that they are not realistically deliverable. • The Council's own Housing Trajectory fails to demonstrate a five year housing land supply for 6-10 years and for 11-15 years. The Council cannot therefore achieve a robust rolling five year supply of deliverable land for housing. • There is a requirement (even if assuming all Large Identified Sites come forward) for new allocations in the order of approximately 2,835 net dwellings to overcome a shortfall of deliverable sites in its Housing Trajectory to simply meet the London Plan's minimum requirements. A much higher delivery target should however be set in line with the London Plan's express statement that these minimum targets should be exceeded. • Based on the foregoing, significant additional housing land will need to be identified. This needs to be

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				<p>expressly stated in the Core Strategy together with a clear statement saying that this additional land will be identified through Area Action Plans and on a Proposals Map accompanying a subsequent Site Allocations DPD. In terms of the background to the Housing Trajectory, the AMR at Appendix 3 sets out the evidence base feeding into the housing trajectory, which comprises:</p> <ul style="list-style-type: none"> • Small scale unidentified windfalls (2004 HCS) =2,740 @ 274 dwellings per annum • Large scale unidentified windfalls (2004 HCS) =600 @ 600 dwellings per annum • Large identified sites (agreed through 2004 HCS) =1,115 @ 115 dwellings per annum • Total supply 2007/08 to 2017 = 4,455 @ 445 dwelling per annum <p>What is particularly concerning is that the Council are seeking to rely heavily on a theoretical supply of unidentified windfall sites which equates to over 75% of the overall total. Furthermore The Council has not demonstrated that the Large identified sites are available, suitable, and achievable as set out by PPS3. Accordingly, the windfall housing supply should be omitted, from the Housing Trajectory and the Large identified sites treated with a high degree of caution at the very least. Further, PPS3 sets out that Urban Capacity Studies (UCS) are to be replaced by Strategic Housing Land Availability Assessments. Strategic Housing Land Availability Assessments are required to be more realistic than the old style UCS and they should identify a rolling supply of sufficient specific deliverable sites for the first 5 years. These must be available, suitable and achievable. Thereafter a further supply of specific developable sites for 6-10 years and where possible for 11-15 years must be identified. Strategic sites, critical to the delivery of the housing strategy must be identified. Another significant change from a UCS is that LPAs are advised not to include sites for which they have granted planning permission "unless they can demonstrate, based upon robust evidence, that the sites are developable and are likely to contribute to housing delivery at the point envisaged" (paragraph 58). The Council has not demonstrated, based upon robust evidence, that the Housing Trajectory is developable and likely to contribute to housing delivery at the point envisaged. The UCS must be replaced with a Strategic Housing Land Availability Assessment. In addition, as noted above, the Council has included in its Housing Trajectory allowances for new housing arising from windfall sites. Allowances for windfalls "should not be included in the first 10 years of land supply unless Local Planning Authorities can provide robust evidence of genuine local circumstances that prevent specific sites being identified" (PPS3 paragraph 59). The Council has not provided robust evidence of genuine local circumstances that prevent specific sites being identified, which would justify inclusion of windfall in its supply. Accordingly, the AMR evidence base supporting the Core Strategy is inconsistent with national planning policy, namely PPS3. Based on the foregoing, the Council's approach to addressing housing land supply is entirely inappropriate and inconsistent with national planning policy, namely PPS3. PPS3 stresses that LPAs must identify and demonstrate a rolling five year supply of deliverable sites for housing. These must be available, suitable and achievable. Thereafter a further supply of specific developable sites for 6-10 years and where possible for 11-15 years must be identified. The Council has not demonstrated a rolling five year supply of deliverable sites for housing and is inconsistent with PPS3 and therefore Core Policy 10 and paras. 5.2.14 to 5.2.19 is not sound. On this basis there will be an under provision of homes compared to the London Plan minimum requirement of 3,950 dwellings in the period 2007/08 - 2017. At a conservative estimate, on the assumption that all large identified sites come forward there is</p>

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				<p>likely to be a requirement for deliverable sites to accommodate 2,835 net new dwellings for the period 2007/08 -2017. Accordingly, it is submitted that it will be necessary for the Council to consider sites, critical to the delivery of the housing strategy in accordance with PPS3 (paragraph 55). This needs to be expressly stated in the Core Strategy together with a clear statement saying that this additional land will be identified through Area Action Plans and on a Proposals Map accompanying a subsequent Site Allocations DPD. The strategy for managing the supply of new housing, set out under paras. 5.2.14 to 5.2.19 and Core Policy 10, is inconsistent with national planning policy and is not based on a robust credible evidence base. • It is inconsistent with national planning policy, namely PPS3. • The strategies/policies/allocations fail to represent the most appropriate in all the circumstances, having considered the relevant alternatives, and they are not founded on a robust and credible evidence base. • The Council's Housing Trajectory must be compliant with national planning policy and must be subject to a robust discounting exercise. Furthermore it must be compliant with PPS3, by: 1. The removal of both large and small scale unidentified windfalls from the trajectory. 2. Discounting existing allocation of large identified sites. 3. Excluding sites with planning permission "unless they can demonstrate, based upon robust evidence, that the sites are developable and are likely to contribute to housing delivery at the point envisaged". 4. Identifying a supply of sufficient specific deliverable sites for a rolling 5 year period. These must be available, suitable and achievable. Thereafter a further supply of specific developable sites for 6-10 years and where possible for 11-15 years must be identified. 5. Accordingly, it is submitted that it will be necessary for the Council to consider sites, critical to the delivery of the housing strategy in accordance with PPS3 (paragraph 55). This needs to be expressly stated in the Core Strategy together with a clear statement saying that this additional land will be identified through Area Action Plans and on a Proposals Map accompanying a subsequent Site Allocations DPD. 6. In view of the foregoing it is recommended that paras. 5.2.14 - 5.2.19 are redrafted, the wording of Core Policy 10 amended or redrafted to reflect the need to identify the need to review the detailed Green Belt boundaries due to the fact, as acknowledged in para. 7.2.4, that there will be limited Green Belt releases within the Borough to accommodate some new homes. 7. Core Policy 10 could be redrafted as follows: "All proposals for development will be considered in the context of the North London Spatial Strategy, shown on the Enfield Key Diagram at Figure 3.1, which sets out the Council's spatial structure and general vision for development growth. The Spatial Strategy provides the framework for sustainable housing and job growth in accordance with the GLA's Sub Regional Development Framework for North London and integrates the necessary infrastructure for delivering development, whilst safeguarding and enhancing key existing environmental, social and economic assets and resources. This includes the protection of the Metropolitan Green Belt (subject to limited boundary reviews where land may be better used for development purposes and where it is possible to create more permanent defensible boundaries) and takes into account issues of climate change, flood risk and the promotion of an 'urban renaissance'. New development will make the best use of previously developed land and buildings and will follow a sequential approach to the sustainable location of development. The Spatial Strategy identifies the Upper Lee Valley Opportunity Area as a primary location for new development. Elsewhere opportunities for housing growth will be considered in areas with good</p>

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				<p>public transport accessibility levels such as town centre locations and areas around the strategic road network, specifically along the length of the A10 Great Cambridge Road and the A406 North Circular. Provision is made for an increase exceeding 3,950 dwellings (net) in the period 2007/08 -2016/17; and the later period from 2017 to 2026 to meet the full range of housing need and lifestyle choices. The Borough-wide Spatial Strategy makes provision for the period 2007/08 - 2016/17: Existing Commitments across the Borough = 1,115 Dwellings Future housing developments to be identified through Area Action Plans and on a Proposals Map accompanying a subsequent Site Allocations DPD (including local Green Belt releases) = 3,380 Dwellings (based on Appendix 3 of the AMR) Total for period 2007/08 to 2017/18 = 4,495 The Council will also look to identify significant additional opportunities for the 10 year period from 2017/18."Finally, it is recognised that the appropriate forum for the identification of sites for development is either through the Proposals Map Site Allocations DPD or relevant Area Action Plan. However it is worth stating at this stage that the allocation of Hadley Homes land interest incorporating Waterworld and Kingswood Nursery and associated land at the junction of Bullsmoor Lane and Great Cambridge Road, Enfield (see attached plan) will facilitate the delivery of housing at a highly sustainable location within the Plan period, thereby assisting in making the objectives of the Plan sound.</p>
Meeting housing requirements	5.2	David Phillips (GL Hearn)	Planning Director Hadley Homes	<p>5.2: Affordable housing with particular reference to paras. 5.2.20 to 5.2.26 We acknowledge the need to secure affordable housing and a mix of affordable housing tenures to meet the Council's housing needs. However specifying the quantum and precise mix in Core Policy 11 is overly restrictive and will stifle the development of housing sites. A more flexible form of wording is recommended. The affordable housing provisions, set out under paras. 5.2.20 to 5.2.26 and Core Policy 11, is inconsistent with national planning policy PPS3 and the tests set down in PPS12. Core Policy 11 seeks to recommend prescribed levels, mix and tenure of affordable housing within residential developments. It should be recognised that the Council is creating a spiral of demand for affordable housing in the Borough. An increase in the level of provision of affordable housing through the mechanism of increasing the percentage target will itself increase the general level of demand for housing. In turn this will sustain the demand for more affordable housing in, especially where the 'normally recognised' tenure is rented accommodation. Planning authorities should work with housing departments to assess the range of needs for different types and sizes of housing across all tenures in their area. It should be made clear that the Policy should not seek to impose the form of tenure proportion. This should be achieved through negotiation. The form of revised wording suggested for Core Policy 11, as set out below, will overcome the objections referred to above and will provide a robust affordable housing policy that meets all the soundness tests. A more flexible form of wording to be applied and Core Policy 11 to be redrafted as follows:" On sites which are acceptable for housing in accordance with other policies of this plan and which are large enough to accommodate a reasonable mix of types and sizes of housing the Council will seek, by negotiation with developers, to secure an element of affordable housing. In assessing the suitability of such sites for the provision of an element of affordable housing, the Council will take into account: i) Site size, suitability and the economics of provision; and ii) The need to achieve a successful housing development. The size and type of dwellings provided shall reflect the needs of those households requiring affordable</p>

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				housing, who cannot ordinarily afford to buy or rent suitable accommodation on the open market."
CORE POLICY 9: PROTECTING AND IMPROVING THE HOUSING STOCK	Preferred Option	Mr Andrzej Warhaftig	Business Manager Enterprise Enfield	We support the preferred option
CORE POLICY 9: PROTECTING AND IMPROVING THE HOUSING STOCK	Preferred Option	Mr Mark Hayes	The Chair Enfield Housing Association Forum	CORE POLICY 9 This policy should be made more pro-active, with the Council leading initiatives to reduce the level of empty homes and to improve the physical condition and energy efficiency of existing housing stock
CORE POLICY 9: PROTECTING AND IMPROVING THE HOUSING STOCK	Preferred Option	Austin Mackie (DTZ Development & Planning)	Director St Modwen	The broad strategy should recognise that where appropriate, improvements to housing stock might be achieved through net overall changes, accepting that in some instances, net reductions on a specific site may be necessary to meet the overall objectives of the CS.
CORE POLICY 9: PROTECTING AND IMPROVING THE HOUSING STOCK	Preferred Option	Mr Giles Dolphin	Planning Decisions Manager Greater London Authority	Support with conditions: The intent of the policy is welcome and it is supported subject to the comments below being fully reflected in the submission version of the core strategy. The current policy is in general conformity with London Plan Policy 3A.4 but in order to be in general conformity with London Plan Policy 3A.15 it should clearly make reference to the need to prevent the loss of housing, including affordable housing, without its planned replacement at existing or higher densities.

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CORE POLICY 10: MANAGING THE SUPPLY OF NEW HOUSING AND LOCATIONS FOR NEW HOMES	Preferred Option	Mr Andrzej Warhaftig	Business Manager Enterprise Enfield	We support Core Option 10 with the observation that mixed and social housing implementation should be dealt with sensitively and in relation to the existing housing stock and demographic profiles.
CORE POLICY 10: MANAGING THE SUPPLY OF NEW HOUSING AND LOCATIONS FOR NEW HOMES	Preferred Option	Mr Mark Hayes	The Chair Enfield Housing Association Forum	CORE POLICY 10 The challenge for this policy is to achieve the commitment to the creation and maintenance of sustainable communities. This implies major intervention from Enfield through the LDF.
CORE POLICY 10: MANAGING THE SUPPLY OF NEW HOUSING AND LOCATIONS FOR NEW HOMES	Preferred Option	James Stevens	Regional Planner (London) Home Builders Federation Ltd	<p>Paragraph 5.2.18 The Council proposes to meet its housing target by facilitating the delivery of sites identified in the London Housing Capacity Study of 2004 and through an expectation that an unspecified number of windfall sites will materialise over the plan period.</p> <p>Reliance on windfalls as an element of the Council's housing trajectory is contrary to PPS3, paragraph 59, which states that: 'Reliance on windfalls should not be included in the first 10 years of land supply unless Local Planning Authorities can provide robust evidence of genuine local circumstances that prevent specific sites being identified'. An allowance for windfalls can be included, but only as an element of a properly conducted SHLAA.</p> <p>Since the Council has not yet begun to prepare a SHLAA and because its five year housing trajectory does not include an inventory of specific development sites accompanied by anticipated housing yields (see comments above), the Council cannot yet rely on windfalls.</p> <p>Paragraph 52 of the CLG practice guidance document Strategic Housing Land Availability Assessments describes how windfalls are permissible, but only as part of a wider survey (the SHLAA process) which identifies sites and broad locations for future growth. Enfield Council may have identified the broad locations, but the sites and expected yields have still to be identified in the emerging Core Strategy housing trajectory (or else an Allocations DPD).</p> <p>Furthermore, paragraph 52 is clear that the SHLAA process has to be informed by 'the industry and by market intelligence' i.e. by housebuilders themselves. To our knowledge housebuilders have not yet been invited by Enfield Council to participate in the SHLAA process or similar exercise.</p>

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				<p>Under the circumstances, the housing section of the emerging Core Strategy is likely to fail PPS12 soundness test vii since it is not founded on a robust and credible evidence base.</p> <p>Paragraph 5.2.21 The term 'key worker' has been dropped by the Mayor as socially divisive. It conveys the impression that low paid workers such as cleaners, shop workers, waiters, security guards, bank clerks etc are no more important to the economy than public servants. The failure to provide these groups with access to housing is as great a threat to social inclusion and mixed neighbourhoods as lack of affordability is for the aforementioned professions. We therefore recommend that any policy seeking to give preferential treatment to 'key workers' is dropped. The equitable solution must be to increase housing supply, not to ration it to certain groups.</p>
<p>CORE POLICY 10: MANAGING THE SUPPLY OF NEW HOUSING AND LOCATIONS FOR NEW HOMES</p>	<p>Preferred Option</p>	<p>James Stevens</p>	<p>Regional Planner (London) Home Builders Federation Ltd</p>	<p>This section of the Core Strategy is very weak on identifying the broad locations, the key development sites and the strategies necessary to enable the Council to meet its housing target.</p> <p>As Paragraph 53 of PPS3 states: 'At the local level, Local Planning Authorities should set out in Local Development Documents their policies and strategies for delivering the level of housing provision, including identifying broad locations and specific sites that will enable continuous delivery of housing for at least 15 years from the date of adoption'. No mention is made in this section of the Council's intention to carry out a Strategic Housing Land Availability Assessment (SHLAA).</p> <p>The SHLAA is integral to the implementation of the Core Strategy since it is instrumental in identifying 'sufficient specific deliverable sites to deliver housing in the first five years' (see para. 54 of PPS3).</p> <p>Consequently Core Policy 10: Managing the supply of new housing and locations for new homes is weak, and we would suggest unsound, as it is not as yet informed by a robust and credible evidence base in the form of a SHLAA.</p> <p>The expected number of units which the sites (which remain as yet unidentified) might yield in these broad locations is undetermined. In due course, this section must be able to demonstrate that its housing objectives are realistic and deliverable and therefore in the absence of a SHLAA which could identify the sources of land necessary to maintain delivery, we believe that this emerging section would fail PPS12 soundness test</p> <p>viii. The housing trajectory on page 45 lacks supporting information and only shows anticipated completion rates. The housing trajectory should be accompanied by information on numbers of permissions and anticipated site yields. As paragraph 55 of PPS3 explains, a housing trajectory focusing on completions should be accompanied by</p> <p>a) a supply of developable sites for 6-10 years, and if possible for 11-15 years;</p> <p>b) the identification of strategic sites critical to the delivery of the housing strategy over the plan</p>

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				<p>period; and</p> <p>c) broad locations on a key diagram and specific sites on a proposals map. Both these maps appear to be lacking from the Preferred Options Core Strategy.</p> <p>Chapter 10 does deal with area strategies but it does not include any information on expected site yields. The Council must also be able to demonstrate that its strategy is realistic and deliverable. It must be able to demonstrate that the sites it identifies are deliverable in accordance with the tests set out in paragraphs 54, 56 and 57 of PPS3. While the detailed aspects of delivery can be left to an Allocations DPD or the relevant Area DPDs, because the delivery of these sites is fundamental to the success of the whole strategy, the council has to be able to demonstrate that they are realistic allocations in general terms as a key foundation of the Core Strategy.</p>
CORE POLICY 10: MANAGING THE SUPPLY OF NEW HOUSING AND LOCATIONS FOR NEW HOMES	Preferred Option	Mr. Gary Thomas	Lionsgate Properties (Planning Works Ltd.)	The role of town centres as a location for housing growth should receive more emphasis in the Policy. These are sustainable locations and the contribution of new residential development to the vitality and viability of town centres should not be ignored. Significant residential provision can be secured in mixed use developments (or as single use schemes) and need not be at the expense of other, more traditional town centre uses.
CORE POLICY 10: MANAGING THE SUPPLY OF NEW HOUSING AND LOCATIONS FOR NEW HOMES	Preferred Option	Ms Karen Foster-	Planning Liaison Officer Environment Agency	Core Policy 10 – This directly conflicts with PPS25, whilst PPS25 is seeking that new development is located in lowest flood risk areas, this policy is seeking to place people in an area at high risk of flooding. Last Paragraph, last sentence, please add 'and having regard for flood risk'.
CORE POLICY 10: MANAGING THE SUPPLY OF NEW HOUSING AND LOCATIONS FOR NEW HOMES	Preferred Option	Ms Sule Nisancioglu	Group Manager, Planning Policy and Transportation London Borough of Haringey	Intensification of uses near a neighbouring borough boundary should take account of the infrastructure needs of the local communities, including the neighbouring borough's communities. Future growth and intensification in the Upper Lee Valley opportunity area should be subject to a rigorous assessment to ensure the avoidance of any flood risk downstream.

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CORE POLICY 10: MANAGING THE SUPPLY OF NEW HOUSING AND LOCATIONS FOR NEW HOMES	Preferred Option	Austin Mackie (DTZ Development & Planning)	Director St Modwen	The broad principles of meeting and exceeding housing targets is welcomed, but as above, the role of Edmonton Green should be recognised alongside other potential growth areas. It will be necessary for the Core Strategy to offer clarity in respect of the 'what, where and when' elements of meeting housing targets, ie, how locations will be able to deliver to support potential housing trajectories.
CORE POLICY 10: MANAGING THE SUPPLY OF NEW HOUSING AND LOCATIONS FOR NEW HOMES	Preferred Option	Ms Vilna Walsh (First Plan)	Director National Grid Property Holdings	The Preferred Option for Core Policy 10 is broadly supported in that it accords with the requirements of the London Plan that DPD policies should seek to exceed targets for additional homes as set out in the London Plan and identify new sources of supply having regard to major development in Opportunity Areas and changes of use of surplus industrial or commercial land for residential or mixed use development. In making reference to "surplus industrial land" it should be clear that this cannot simply be a matter of quantitative assessment. A qualitative assessment is also necessary to assess whether the land meets the needs of modern business and therefore whether there is a realistic prospect of it coming forward for employment use. This is not advocating an open-door approach for considering land which is being held back from development on a "hope value" basis but would afford an opportunity for sites which have real constraints in terms of delivering employment floorspace to be brought forward for other land-uses. Particular constraints include abnormal costs associated with the legacy of historic uses. The approach to managing the supply of new housing and locations for new homes should recognise that even if in quantitative terms it is found that there is little or no surplus industrial/commercial land to accommodate such development that there may still be industrial/commercial sites which in qualitative terms and based on site specific constraints should still be released to meet the Borough and London Plan requirements for new residential development and to meet objectives for the identified Opportunity Areas. The following wording, shown in bold and underlined, should be added to the second paragraph of the Preferred Option for Core Policy 10: <u>To significantly exceed the target, new development will need to be brought forward in the Upper Lee Valley Opportunity Area through intensification of uses, promotion of residential development and mixed uses and some release of surplus employment land. This release will need to be based both on quantitative and qualitative assessment of existing employment sites and the extent to which particular sites can contribute to regeneration objectives for the Upper Lee Valley area. Jobs, physical and social....</u>

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CORE POLICY 10: MANAGING THE SUPPLY OF NEW HOUSING AND LOCATIONS FOR NEW HOMES	Preferred Option	Miss Renee Goodwin (GVA Grimley Ltd)	Principal Planner La Salle Investment Management	We support new development in the Upper Lee Valley Opportunity Area through intensification of uses, promotion of mixed uses and the release of surplus employment land.
CORE POLICY 10: MANAGING THE SUPPLY OF NEW HOUSING AND LOCATIONS FOR NEW HOMES	Preferred Option	Steven Mills	Senior Town Planner Network Rail	Core Policy 10 (last paragraph) should also be amended to provide more explicit support for higher density housing wherever possible, in line with government and GLA guidance.
CORE POLICY 10: MANAGING THE SUPPLY OF NEW HOUSING AND LOCATIONS FOR NEW HOMES	Preferred Option	Duncan Bennett (CgMs Consulting)	Senior Associate Director Fairview New Homes Ltd	Fairview New Homes supports Core Policy 10. Specifically it supports the identification that the 3,950 new dwellings required in accordance with the London Plan is a minimum requirement. Fairview New Homes also supports the provision within Core Policy 10 for considering opportunities for housing growth in areas with higher public transport accessibility levels such as town centre locations. Lastly, Fairview New Homes support the provision with Core Policy 10 allowing new residential development to be built at densities that make the best use of land having regard to access to public transport. These aspects of Core Policy 10 are in line with the principles of sustainable development as set out in PPS1 and PPS3.

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CORE POLICY 10: MANAGING THE SUPPLY OF NEW HOUSING AND LOCATIONS FOR NEW HOMES	Preferred Option	Mr Giles Dolphin	Planning Decisions Manager Greater London Authority	Support with conditions: The intent of the policy is welcome and it is supported subject to the comments below being fully reflected in the submission version of the core strategy. The wording of the second paragraph regarding the Upper Lee Valley Opportunity Area "Jobs, physical and social infrastructure..." should be amended to make clear reference to public transport improvements and accessibility, in addition to the other references to public transport in the policy. These other references to public transport accessibility are welcome but not sufficient to ensure general conformity with London Plan Policy 3A.3. As highlighted above with regard to Core Policy 1 London Plan Policy 3A.3 requires that Borough's develop residential density policies in their DPD's in line with it and adopt the residential density ranges set out in Table 3A.2. The omission of such a policy would cause significant harm to the implementation of the London Plan and so the submission version must introduce such a policy either as part of this policy, another policy or as a stand alone policy.
CORE POLICY 10: MANAGING THE SUPPLY OF NEW HOUSING AND LOCATIONS FOR NEW HOMES	Preferred Option	Philip Murphy	Associate RPS	Core Policy 10 identifies the need to plan for a minimum provision of 3,950 homes to 2016. Beyond this, a target of 395 homes a year is proposed. This is now at odds with the London Plan (Consolidated Changes Since 2004) which expects a significant quantum of housing to be provided across the Upper Lee Valley, as identified by the increase from 700 to 7,000 units for the Upper Lee Valley in the adopted Further Alterations to the London Plan. It is therefore recommended that the wording of Core Policy 10 be updated to explicitly reflect the expectation of greater housing development in the Upper Lee Valley, in accordance with the London Plan.
CORE POLICY 10: MANAGING THE SUPPLY OF NEW HOUSING AND LOCATIONS FOR NEW HOMES	Preferred Option	David Phillips (GL Hearn)	Planning Director Hadley Homes	"5.2: Meeting housing requirements with particular reference to paras. 5.2.14 to 5.2.19 and managing the supply of new housing and locations for new homes. The strategy for managing the supply of new housing and locations for new housing, set out under paras. 5.2.14 to 5.2.19, is inconsistent with national planning policy and is not based on a robust credible evidence base. <ul style="list-style-type: none"> • Having reviewed the Council's Housing Trajectory (Figure 5.1 of the Core Strategy and the latest Annual Monitoring Report 2006/07 (AMR) with reference to Figure 6.1 (a) and Figure 6.1 (b)», it is considered appropriate to undertake a conservative robust discounting exercise to exclude projected windfall allocations. This has identified a residual shortfall of 2,795 net new dwellings to accommodate the London Plan's minimum requirement of 3,950 dwellings in the plan period 2007/08 to 2017. • The Council's own Housing Trajectory is unrealistically optimistic and not based on a robust evidence base. A more realistic assessment of annualised supply is 115 units per annum (1,115 on the assumption that all Large Identified Sites referred to in Appendix 3 of the latest AMR can be delivered) which is 70% below the annualised minimum requirement and over 78% below the Council's projected annualised delivery. However, based on current best practice set out in PPS3, even these large sites should be excluded from the supply base where it can not be demonstrated that they are not realistically deliverable. • The Council's own Housing Trajectory fails to demonstrate a five year housing land supply for 6-10 years and for 11-15 years. The Council cannot therefore achieve a robust rolling five year supply of deliverable land for housing. • There is a requirement (even if assuming all Large Identified

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				<p>Sites come forward) for new allocations in the order of approximately 2,835 net dwellings to overcome a shortfall of deliverable sites in its Housing Trajectory to simply meet the London Plan's minimum requirements. A much higher delivery target should however be set in line with the London Plan's express statement that these minimum targets should be exceeded. • Based on the foregoing, significant additional housing land will need to be identified. This needs to be expressly stated in the Core Strategy together with a clear statement saying that this additional land will be identified through Area Action Plans and on a Proposals Map accompanying a subsequent Site Allocations DPD. In terms of the background to the Housing Trajectory, the AMR at Appendix 3 sets out the evidence base feeding into the housing trajectory, which comprises: • Small scale unidentified windfalls (2004 HCS) =2,740 @ 274 dwellings per annum • Large scale unidentified windfalls (2004 HCS) =600 @ 600 dwellings per annum • Large identified sites (agreed through 2004 HCS) =1,115 @ 115 dwellings per annum • Total supply 2007/08 to 2017 = 4,455 @ 445 dwelling per annum What is particularly concerning is that the Council are seeking to rely heavily on a theoretical supply of unidentified windfall sites which equates to over 75% of the overall total. Furthermore The Council has not demonstrated that the Large identified sites are available, suitable, and achievable as set out by PPS3. Accordingly, the windfall housing supply should be omitted, from the Housing Trajectory and the Large identified sites treated with a high degree of caution at the very least. Further, PPS3 sets out that Urban Capacity Studies (UCS) are to be replaced by Strategic Housing Land Availability Assessments. Strategic Housing Land Availability Assessments are required to be more realistic than the old style UCS and they should identify a rolling supply of sufficient specific deliverable sites for the first 5 years. These must be available, suitable and achievable. Thereafter a further supply of specific developable sites for 6-10 years and where possible for 11-15 years must be identified. Strategic sites, critical to the delivery of the housing strategy must be identified. Another significant change from a UCS is that LPAs are advised not to include sites for which they have granted planning permission "unless they can demonstrate, based upon robust evidence, that the sites are developable and are likely to contribute to housing delivery at the point envisaged" (paragraph 58). The Council has not demonstrated, based upon robust evidence, that the Housing Trajectory is developable and likely to contribute to housing delivery at the point envisaged. The UCS must be replaced with a Strategic Housing Land Availability Assessment. In addition, as noted above, the Council has included in its Housing Trajectory allowances for new housing arising from windfall sites. Allowances for windfalls "should not be included in the first 10 years of land supply unless Local Planning Authorities can provide robust evidence of genuine local circumstances that prevent specific sites being identified" (PPS3 paragraph 59). The Council has not provided robust evidence of genuine local circumstances that prevent specific sites being identified, which would justify inclusion of windfall in its supply. Accordingly, the AMR evidence base supporting the Core Strategy is inconsistent with national planning policy, namely PPS3. Based on the foregoing, the Council's approach to addressing housing land supply is entirely inappropriate and inconsistent with national planning policy, namely PPS3. PPS3 stresses that LPAs must identify and demonstrate a rolling five year supply of deliverable sites for housing. These must be available, suitable and achievable. Thereafter a further supply of specific developable sites for 6-10 years and where possible for 11-15 years</p>

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				<p>must be identified. The Council has not demonstrated a rolling five year supply of deliverable sites for housing and is inconsistent with PPS3 and therefore Core Policy 10 and paras. 5.2.14 to 5.2.19 is not sound. On this basis there will be an under provision of homes compared to the London Plan minimum requirement of 3,950 dwellings in the period 2007/08 - 2017. At a conservative estimate, on the assumption that all large identified sites come forward there is likely to be a requirement for deliverable sites to accommodate 2,835 net new dwellings for the period 2007/08 -2017. Accordingly, it is submitted that it will be necessary for the Council to consider sites, critical to the delivery of the housing strategy in accordance with PPS3 (paragraph 55). This needs to be expressly stated in the Core Strategy together with a clear statement saying that this additional land will be identified through Area Action Plans and on a Proposals Map accompanying a subsequent Site Allocations DPD. The strategy for managing the supply of new housing, set out under paras. 5.2.14 to 5.2.19 and Core Policy 10, is inconsistent with national planning policy and is not based on a robust credible evidence base. • It is inconsistent with national planning policy, namely PPS3. • The strategies/policies/allocations fail to represent the most appropriate in all the circumstances, having considered the relevant alternatives, and they are not founded on a robust and credible evidence base. • The Council's Housing Trajectory must be compliant with national planning policy and must be subject to a robust discounting exercise. Furthermore it must be compliant with PPS3, by: 1. The removal of both large and small scale unidentified windfalls from the trajectory. 2. Discounting existing allocation of large identified sites. 3. Excluding sites with planning permission "unless they can demonstrate, based upon robust evidence, that the sites are developable and are likely to contribute to housing delivery at the point envisaged". 4. Identifying a supply of sufficient specific deliverable sites for a rolling 5 year period. These must be available, suitable and achievable. Thereafter a further supply of specific developable sites for 6-10 years and where possible for 11-15 years must be identified. 5. Accordingly, it is submitted that it will be necessary for the Council to consider sites, critical to the delivery of the housing strategy in accordance with PPS3 (paragraph 55). This needs to be expressly stated in the Core Strategy together with a clear statement saying that this additional land will be identified through Area Action Plans and on a Proposals Map accompanying a subsequent Site Allocations DPD. 6. In view of the foregoing it is recommended that paras. 5.2.14 - 5.2.19 are redrafted, the wording of Core Policy 10 amended or redrafted to reflect the need to identify the need to review the detailed Green Belt boundaries due to the fact, as acknowledged in para. 7.2.4, that there will be limited Green Belt releases within the Borough to accommodate some new homes. 7. Core Policy 10 could be redrafted as follows: "All proposals for development will be considered in the context of the North London Spatial Strategy, shown on the Enfield Key Diagram at Figure 3.1, which sets out the Council's spatial structure and general vision for development growth. The Spatial Strategy provides the framework for sustainable housing and job growth in accordance with the GLA's Sub Regional Development Framework for North London and integrates the necessary infrastructure for delivering development, whilst safeguarding and enhancing key existing environmental, social and economic assets and resources. This includes the protection of the Metropolitan Green Belt (subject to limited boundary reviews where land may be better used for development purposes and where it is possible to create more permanent defensible</p>

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				boundaries) and takes into account issues of climate change, flood risk and the promotion of an 'urban renaissance'. New development will make the best use of previously developed land and buildings and will follow a sequential approach to the sustainable location of development. The Spatial Strategy identifies the Upper Lee Valley Opportunity Area as a primary location for new development. Elsewhere opportunities for housing growth will be considered in areas with good public transport accessibility levels such as town centre locations and areas around the strategic road network, specifically along the length of the A10 Great Cambridge Road and the A406 North Circular. Provision is made for an increase exceeding 3,950 dwellings (net) in the period 2007/08 -2016/17; and the later period from 2017 to 2026 to meet the full range of housing need and lifestyle choices. The Borough-wide Spatial Strategy makes provision for the period 2007/08 - 2016/17: Existing Commitments across the Borough = 1,115 Dwellings Future housing developments to be identified through Area Action Plans and on a Proposals Map accompanying a subsequent Site Allocations DPD (including local Green Belt releases) = 3,380 Dwellings (based on Appendix 3 of the AMR) Total for period 2007/08 to 2017/18 = 4,495 The Council will also look to identify significant additional opportunities for the 10 year period from 2017/18."Finally, it is recognised that the appropriate forum for the identification of sites for development is either through the Proposals Map Site Allocations DPD or relevant Area Action Plan. However it is worth stating at this stage that the allocation of Hadley Homes land interest incorporating Waterworld and Kingswood Nursery and associated land at the junction of Bullsmoor Lane and Great Cambridge Road, Enfield (see attached plan) will facilitate the delivery of housing at a highly sustainable location within the Plan period, thereby assisting in making the objectives of the Plan sound."
CORE POLICY 11: AFFORDABLE HOUSING	Preferred Option	Mr Andrzej Warhaftig	Business Manager Enterprise Enfield	The expressed % of affordable housing are high, and whilst we acknowledge the views, it seems that experience in other parts of London show that high density social housing does not attract ownership, or lead to "staircasing".
CORE POLICY 11: AFFORDABLE HOUSING	Preferred Option	Mr Mark Hayes	The Chair Enfield Housing Association Forum	CORE POLICY 11 The LDF should recognise the desirability of achieving genuine mixed and sustainable communities, with well designed and managed affordable housing alongside home ownership opportunities that result in genuine home ownership, as opposed to concentrations of "buy-to-let" properties that can undermine the sustainability of communities. The targets for affordable homes outlined in this policy should be rigorously pursued.
CORE POLICY 11: AFFORDABLE HOUSING	Preferred Option	James Stevens	Regional Planner (London) Home Builders Federation Ltd	Core Policy 11: Affordable Housing The HBF would welcome a reference to site viability in the policy, along the lines of the wording included in paragraph 5.2.23 which states that the Council will seek the 'maximum reasonable on site contribution having regard to economic viability' Paragraph 5.2.27 and Core Policy 12: Housing Mix The Council states that it is commissioning a Local Housing Study. It should be commissioning a Strategic Housing Market Assessment (to complement the GLA Strategic Housing Market Assessment). Paragraph 22 of PPS3 states that the likely proportions of housing tenure and size must be based upon the findings of a Strategic

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				Housing Market Assessment (SHMA), in other words a robust and credible evidence base. The CLG Practice Guidance describes how SHMAs differ from previous housing studies such as the old Housing Needs Assessments in that they focus upon meeting market need as much as predicting social housing need. Paragraph 5.2.28 As stated by your earlier respondent, we confirm that the LPA cannot determine the size, type and tenure of market homes. Based upon market and commercial information available to them housebuilders are the best placed to respond to market demand in specific areas. Paragraph 5.3.3 The Council suggests that social and economic impact assessments may be required for all significant development within the Borough and all major developments within or which impact upon Areas for Regeneration. We would like clarification of what this might involve for developers. However, surely this is the function of the Sustainability Appraisal? The purpose of such an exercise is to identify those broad locations and sites that can be developed sustainably? If there is doubt about their sustainability from a social or economic perspective then they should not have been allocated for development and regeneration in the first place, or else the Council should identify what measures need to be taken to render them viable for development. It is wholly unreasonable for the Council to place further obstacles of this type in the way of housing development which is meeting a vital social (and indirectly an economic) need. We believe that such a requirement would be contrary to soundness test iii.
CORE POLICY 11: AFFORDABLE HOUSING	Preferred Option	Austin Mackie (DTZ Development & Planning)	Director St Modwen	The broad approach is consistent with the London Plan. The commentary in the supporting text regarding flexible application of tenure mix to support balanced communities is welcomed, although this could be stated within the policy itself. In addition, the flexibility should allow for not simply substitution of social rented with intermediate tenure, but also in appropriate locations, an increased proportion of private tenure, especially where this would support regeneration or other key CS objectives.
CORE POLICY 11: AFFORDABLE HOUSING	Preferred Option	Ms Vilna Walsh (First Plan)	Director National Grid Property Holdings	The preferred Option for Core Policy 11 is broadly supported. However, the policy must ensure that specific mention is made to the fact that the maximum reasonable on site contribution of affordable housing will be sought having regard to economic viability and site specific considerations. This is to ensure that the policy is flexible enough to be responsive to site specific considerations including abnormal costs which may arise in bringing certain sites forward for development in accordance with the provisions of Policy 3A.10 of the London Plan and PPS 3. The following wording, shown in bold and underlined should be added to the second paragraph of Core Policy 11: Affordable Housing: ...and the merits of securing private equity contributions wherever possible. New development in appropriate schemes should make the maximum reasonable on-site contributions to this target having regard to economic viability and site specific considerations. The supporting text to Core Policy 11 should include reference to the need for assessment on the basis of the Three Dragons Toolkit to accompany applications.

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CORE POLICY 11: AFFORDABLE HOUSING	Preferred Option	Miss Renee Goodwin (GVA Grimley Ltd)	Principal Planner La Salle Investment Management	Comments: We support the provision of affordable housing targets. However, the policy should recognise, in line with Policy 3A.10 of the London Plan (2008), the need to encourage rather than restrain development. In establishing provision, boroughs should take into account economic viability. Proposed Changes: Amend policy to ensure economic viability and individual site circumstances are taken into account in the assessment of affordable housing provision.
CORE POLICY 11: AFFORDABLE HOUSING	Preferred Option	Steven Mills	Senior Town Planner Network Rail	As it is currently worded Network Rail would object to Core Policy 11 on Affordable Housing as this does not explicitly take on board the issues regarding viability and need for a flexible approach as set out in our earlier Issues and Options response, attached for your ease of reference.
CORE POLICY 11: AFFORDABLE HOUSING	Preferred Option	Duncan Bennett (CgMs Consulting)	Senior Associate Director Fairview New Homes Ltd	Fairview New Homes recognises that the provisions of Core Policy 11 closely follow those of the London Plan which seeks 50% of overall new housing provision to be affordable. However, Fairview objects to the policy's omission of reference to feasibility within this policy requirement. Policy 3A.10 of the London Plan (consolidated with alterations since 2004) provides guidance on negotiating affordable housing in individual private residential and mixed-use schemes. The policy states that Boroughs should seek the maximum reasonable amount of affordable housing when negotiating on individual private residential and mixed-use schemes, having regard to their affordable targets adopted in line with Policy 3A.9, the need to encourage rather than restrain residential development and the individual circumstances of the site. Fairview New Homes therefore seek an amendment to Core Policy 11 to include reference to the balancing factors set out in Policy 3A.10 of the London Plan.
CORE POLICY 11: AFFORDABLE HOUSING	Preferred Option	Mr Giles Dolphin	Planning Decisions Manager Greater London Authority	Support with conditions: The intent of the policy is welcome and it is supported subject to the revisions below being fully reflected in the submission version of this policy. The policy currently fails to clearly define affordable housing, as required by London Plan Policy 3A.8 either in the policy or supporting text. Furthermore, whilst the policy is broadly consistent with the requirements of London Plan policies 3A.9 and 3A.10 the wording of the policy should be restructured to make its application clear and consistent with the London Plan, thereby avoiding the potential for significant harm to the implementation of the London Plan. The reference, in the context of the 70:30 social/intermediate tenure split, to having regard to the merits of securing private equity contributions is misplaced and should be applied to the site specific aspect of the policy. The following wording is suggested: "A mix of affordable housing tenures will be sought to meet the Borough's housing needs. Affordable housing is defined as housing designed to meet the needs of households whose incomes are not sufficient to allow them access to decent and appropriate housing in the Borough. The Council will, working with its partners, aim for 50% of overall new housing provision in the Borough to be affordable housing and, within that, for a borough-wide ratio of 70% social rented and 30% intermediate housing provision to have regard to the London Plan and Enfield's Housing Needs Assessment. The Council will require that new developments of 10 residential units or more make the maximum reasonable on-site contribution to this target, having regard to the individual circumstances of the site, the availability of public subsidy and other scheme requirements. In areas where there are high concentrations of social

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				housing the Council will seek to ensure that the proportion of intermediate homes in new developments promotes mixed and balanced communities, taking account of the borough-wide targets above."
CORE POLICY 11: AFFORDABLE HOUSING	Preferred Option	David Phillips (GL Hearn)	Planning Director Hadley Homes	5.2: Affordable housing with particular reference to paras. 5.2.20 to 5.2.26 We acknowledge the need to secure affordable housing and a mix of affordable housing tenures to meet the Council's housing needs. However specifying the quantum and precise mix in Core Policy 11 is overly restrictive and will stifle the development of housing sites. A more flexible form of wording is recommended. The affordable housing provisions, set out under paras. 5.2.20 to 5.2.26 and Core Policy 11, is inconsistent with national planning policy PPS3 and the tests set down in PPS12. Core Policy 11 seeks to recommend prescribed levels, mix and tenure of affordable housing within residential developments. It should be recognised that the Council is creating a spiral of demand for affordable housing in the Borough. An increase in the level of provision of affordable housing through the mechanism of increasing the percentage target will itself increase the general level of demand for housing. In turn this will sustain the demand for more affordable housing in, especially where the 'normally recognised' tenure is rented accommodation. Planning authorities should work with housing departments to assess the range of needs for different types and sizes of housing across all tenures in their area. It should be made clear that the Policy should not seek to impose the form of tenure proportion. This should be achieved through negotiation. The form of revised wording suggested for Core Policy 11, as set out below, will overcome the objections referred to above and will provide a robust affordable housing policy that meets all the soundness tests. A more flexible form of wording to be applied and Core Policy 11 to be redrafted as follows:" On sites which are acceptable for housing in accordance with other policies of this plan and which are large enough to accommodate a reasonable mix of types and sizes of housing the Council will seek, by negotiation with developers, to secure an element of affordable housing. In assessing the suitability of such sites for the provision of an element of affordable housing, the Council will take into account: i) Site size, suitability and the economics of provision; and ii) The need to achieve a successful housing development. The size and type of dwellings provided shall reflect the needs of those households requiring affordable housing, who cannot ordinarily afford to buy or rent suitable accommodation on the open market."
CORE POLICY 12: HOUSING MIX	Preferred Option	Mr Andrzej Warhaftig	Business Manager Enterprise Enfield	We do have some reservations about the need for larger housing, and how this will fit within the existing market place mix, as much of the demand is coming from a limited number of communities.

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CORE POLICY 12: HOUSING MIX	Preferred Option	Mr Mark Hayes	The Chair Enfield Housing Association Forum	CORE POLICY 12 In implementing this policy, care should be taken to ensure that the LDF facilitates the development of actual schemes that meet the needs that have been identified, rather than schemes that may generate greater financial return at the expense of local housing needs
CORE POLICY 12: HOUSING MIX	Preferred Option	James Stevens	Regional Planner (London) Home Builders Federation Ltd	Paragraph 5.2.27 and Core Policy 12: Housing Mix The Council states that it is commissioning a Local Housing Study. It should be commissioning a Strategic Housing Market Assessment (to complement the GLA Strategic Housing Market Assessment). Paragraph 22 of PPS3 states that the likely proportions of housing tenure and size must be based upon the findings of a Strategic Housing Market Assessment (SHMA) 'in other words a robust and credible evidence base. The CLG Practice Guidance describes how SHMAs differ from previous housing studies such as the old Housing Needs Assessments in that they focus upon meeting market need as much as predicting social housing need. Paragraph 5.2.28 As stated by your earlier respondent, we confirm that the LPA cannot determine the size, type and tenure of market homes. Based upon market and commercial information available to them housebuilders are the best placed to respond to market demand in specific areas. Paragraph 5.3.3 The Council suggests that social and economic impact assessments may be required for all significant development within the Borough and all major developments within or which impact upon Areas for Regeneration. We would like clarification of what this might involve for developers. However, surely this is the function of the Sustainability Appraisal? The purpose of such an exercise is to identify those broad locations and sites that can be developed sustainably? If there is doubt about their sustainability from a social or economic perspective then they should not have been allocated for development and regeneration in the first place, or else the Council should identify what measures need to be taken to render them viable for development. It is wholly unreasonable for the Council to place further obstacles of this type in the way of housing development which is meeting a vital social (and indirectly an economic) need. We believe that such a requirement would be contrary to soundness test iii.
CORE POLICY 12: HOUSING MIX	Preferred Option	mr gary thomas	Lionsgate Properties (Planning Works Ltd.)	Many potential housing sites are not able to provide a range of housing sizes and types for a number of reasons. The Policy needs to recognise the balance to be made between the best use of land and resources and providing housing choice. The Policy should therefore be more flexible in seeking a range of housing sizes and types when appropriate by reference to certain criteria such as site location (town centre/non town centre sites), type of development (brownfield new build or conversion) and by reference to London Plan policies on the most efficient use of land and density dependent on location.
CORE POLICY 12: HOUSING MIX	Preferred Option	Mr Chris Baker	Government Office for London	This policy is very broadly worded. To provide some value, it needs input from the evidence base in the form of some locally specific data showing what sort of mix is needed in areas of the borough. It should not repeat the wording of PPS3 (esp. para. 24).

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CORE POLICY 12: HOUSING MIX	Preferred Option	Austin Mackie (DTZ Development & Planning)	Director St Modwen	The policy should also reflect the suitability of some locations to meeting a particular unit type, for example, town centre regeneration schemes may be less suited to a traditional % mix of family housing, but represent ideal locations for smaller market and intermediate housing units.
CORE POLICY 12: HOUSING MIX	Preferred Option	Ms Vilna Walsh (First Plan)	Director National Grid Property Holdings	National Grid support the main principles of Core Policy 12 and in particular the fact that the mix of new homes should rightly reflect up to date, robust and credible assessment by means of Strategic Housing Market and Local Housing Assessments. In addition to housing mix requirements being based on a sound evidence base, the wording of the policy must also have regard to individual site circumstances. An over-prescriptive or inflexible policy will be unable to respond to individual site constraints. For example, on sites which are contaminated remediation of parts of the site may prove prohibitively expensive and options of containment may need to be considered as an alternative. In this respect the most appropriate form of housing to place on such land would be apartments which obviate the need for private garden space. Site specific requirements for apartments may have a knock-on effect on the extent to which a particular scheme is then able to reflect identified housing needs in terms of housing sizes and types. The following additional wording should be included within the policy: ...and that the mix of new homes reflects the findings of Strategic Housing and Local Housing Assessments whilst also taking into account site specific and local considerations.
CORE POLICY 12: HOUSING MIX	Preferred Option	Miss Renee Goodwin (GVA Grimley Ltd)	Principal Planner La Salle Investment Management	Comments: We support the provision of new development to offer a range of housing sizes and types to meet housing need. However, it is considered that not all sites and forms of development will be appropriate for family housing. Proposed Changes: Amend policy to recognise that not all sites are appropriate for family housing.
CORE POLICY 12: HOUSING MIX	Preferred Option	Mr Giles Dolphin	Planning Decisions Manager Greater London Authority	Support with conditions: The policy should state that evidence of regional needs will also be taken into account. In particular, the 2004 London Housing Requirements Study and the next publication of the London Plan Housing SPG (expected later this year) which will reflect the 2008 London Strategic Housing Market Assessment. Taking regional assessments of need is in line with London Plan Policy 3A.9, the London Plan Housing SPG and PPS3.
Healthier, safer communities	5.3	Mr Peter O'Brien	Partnership Manager Learning Skills Council	Core strategy 16: We believe that the Core Strategy document should make it clear that the Children and Young People's Plan is the principal vehicle for implementing this aspect of strategy with partners. We would like to see a sub-paragraph or bullet point that comments on maximising the impact of spatial planning and economic development on the design and delivery of education in primary, secondary and post-16 settings. Paragraph 5.3.34: We suggest adding: "A single strategy for education facilities will integrate Building Schools for the Future and the Learning and Skills Council's Capital Funding, especially as it impacts on post-16 education, the implementation of Diplomas and the likely introduction of compulsory participation for 16-18 year olds."

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Healthier, safer communities	5.3	Ms Anna Chapman	Planner British Waterways-London Region	5.3.31 What You Told Us The fifth bullet point should be re-worded to reflect the fact that British Waterways encourage the use of floating and not flooding classrooms, and that the existing floating classroom "Beauchamp" is not owned by British Waterways but by a charitable trust which British Waterways supports and promotes.
Healthier, safer communities	5.3	Mr Stephen Conroy	Deputy Chief Executive Enfield Primary Care Trust	The PCT welcomes the recognition of the need for the development of healthcare in the East of the borough. As stated above the PCT will seek to deliver this improvement through the development of the 'hub and spoke' model of primary care. This is likely to involve the Forest Road and Evergreen Primary Care being used as 'hubs' with some smaller premises being brought into these hubs overtime. Ultimately it is envisaged that these 2 sites will serve approximately 50,000 patients each. Further plans may involve the development of Eagle House, possibly into the adjacent Council-owned car park and the development of a large 'spoke' practice in Innova Park though this proposal will need to be consulted upon. The PCT is committed to providing an Urgent Care Centre at Chase Farm hospital operating 7 days a week (subject to an appeal to the Secretary of State for Health) and, subject to consultation, will seek to a hub of 50,000 patients in the Enfield Town area by combining practices. St. Michaels is an important Primary Care Centre that currently provides a range of specialist community healthcare services and will need to be factored into the planning for this area. Following existing urban densities the PCT is likely to consult on developing new facilities in the Southgate and Palmers Green town centres but as yet it is undetermined where either the hub or spoke is likely may be situated. In regenerating the primary care estate, the PCT will need to consider the possibility of extending existing building where they are located ideally for good transport and to ensure a good geographical spread of the spokes. The PCT welcomes the recognition of the need to produce guidelines for Health Impact Assessments but also believes that future development of the borough should be informed by Joint Strategic Needs Assessments (JSNA's) i.e. an analysis of the health and well-being needs of the borough undertaken in partnership by the PCT and the Local Authority. The PCT welcomes the recognition the urban development significantly impacts upon the demand for healthcare within the borough and that obligatory contributions towards healthcare facilities should be made in the light of these developments. This should recognise that even small-scale developments will impact upon the demand for healthcare services even when this extra demand does not require a building. It is rightly mentioned that urban development should have due regard to providing services close to where people live and the PCT is actively pursuing a policy of providing care closer to home.
CORE POLICY 13: HEALTH CARE AND WIDER DETERMINANTS OF HEALTH	Preferred Option	Mr Ade Adeshina	Chief Executive O'Bay Community Trust	On health: Re HIV & AIDS. This disease and illness is said to be high and raising among the African Community within the Borough of Haringey and Enfield. This also needs to reflect in your core strategy with a clear structure and procedure of addressing this raising problem, before it spreads out of control, even to the entire community as a direct result of co-habiting. The entire community development core strategy lack effective and pro-active approaches to tackling BME issues.

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CORE POLICY 13: HEALTH CARE AND WIDER DETERMINANTS OF HEALTH	Preferred Option	Mr Chris Baker	Government Office for London	Similar comments apply to this policy as to CP 12 and others; this is just a general statement about working relationships with PCT's etc. To justify inclusion, it should perhaps identify proposals for new health provision in the borough.
CORE POLICY 13: HEALTH CARE AND WIDER DETERMINANTS OF HEALTH	Preferred Option	Mr Dominic Coath	Natural England	This policy links in strongly with increasing the provision of green spaces and people's access to nature both of which have been shown to improve health and well-being.
CORE POLICY 13: HEALTH CARE AND WIDER DETERMINANTS OF HEALTH	Preferred Option	Ms Vilna Walsh (First Plan)	Director National Grid Property Holdings	National Grid support the broad thrust of Core Policy 13. However, this is on the basis that the implementation of this policy is full supported by up-to-date, robust and credible assessment of need and the provision of a criteria based SPD detailing the form and scale of contributions which will be sought. This is to ensure a clear framework and to provide clarity for landowners and developers bringing forward development proposals. Any contributions sought for health care facilities and other community services requirements should accord with the provisions of Circular 05/05.
CORE POLICY 13: HEALTH CARE AND WIDER DETERMINANTS OF HEALTH	Preferred Option	Mr Stephen Wilkinson	Head of Planning and Regeneration Lee Valley Regional Park Authority	The Core Strategy should include a specific reference to the role of the Regional Park in tackling health inequalities. Supporting text in this section should be revised to identify the Regional Park's unique leisure offer.
CORE POLICY 13: HEALTH CARE AND WIDER DETERMINANTS OF HEALTH	Preferred Option	Mr Giles Dolphin	Planning Decisions Manager Greater London Authority	Support: This policy is supported.

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CORE POLICY 14: SAFER & STRONGER COMMUNITIES	Preferred Option	Mr Mark Hayes	The Chair Enfield Housing Association Forum	CORE POLICY 14 This policy would be a lot stronger if the words "seeking to" were deleted, with a commitment to "creating environments that..."
CORE POLICY 14: SAFER & STRONGER COMMUNITIES	Preferred Option	Mr Chris Baker	Government Office for London	Comments as for CP 13 in that this policy is very general and is not locally distinctive. Crime reduction is something that all local authorities should be supporting. What are the actual initiatives that would be carried out during the plan period?
CORE POLICY 14: SAFER & STRONGER COMMUNITIES	Preferred Option	Mr Matthew Roe (CgMs)	Senior Associate Director Metropolitan Police Authority	The London Plan reinforces policing as a material planning consideration across London; Policy 3A.17 includes 'policing facilities' in the definition of social infrastructure, and Policy 3A.26 make reference to 'policing facilities' in the range of 'strategic' community related issues. Furthermore, reference is made in Policy 3A.26 for the need to enhance safety and security, thereby ensuring 'Secured By Design' objectives are reinforced through strategic policy. Accordingly the Council's policies should reflect scope of the London Plan. The MPA welcome the reference to 'police facilities' in the implementation section. However, as outlined in our previous representation dated 30th May 2007, the MPA request this policy to be extended to make specific reference to 'Secured By Design' requirements and the principles of 'Safer Places' to create safer and stronger communities.
CORE POLICY 14: SAFER & STRONGER COMMUNITIES	Preferred Option	Mr Giles Dolphin	Planning Decisions Manager Greater London Authority	Support: This policy is supported.
CORE POLICY 15: SUPPORTING PEOPLE	Preferred Option	Mr Andrzej Warhaftig	Business Manager Enterprise Enfield	The travellers sites should be in relation to, and in line with, the facilities being made available by all surrounding boroughs.
CORE POLICY 15: SUPPORTING PEOPLE	Preferred Option	Mr Mark Hayes	The Chair Enfield Housing Association Forum	CORE POLICY 15 This policy should be split into two policies, one referring to meeting the needs of the Supporting People Strategy and the other to the specific issue of traveller sites.

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CORE POLICY 15: SUPPORTING PEOPLE	Preferred Option	James Stevens	Regional Planner (London) Home Builders Federation Ltd	Core Policy 15: Supporting People The Council might support the introduction of Lifetime Homes but this is not mandatory and this should be reflected in the policy. Nevertheless, the housing industry has agreed that all new homes should reach Level 6 of the Code for Sustainable Homes by 2016. Incorporated within Level 6 is the Lifetime Homes standard. We would therefore welcome the support of the Council in helping the housing industry manage the gradual transition towards code level 6, allowing time for product research and development to embed and for supply chains to adjust, rather than insisting on higher standards much earlier which could have a deleterious effect on housing supply.
CORE POLICY 15: SUPPORTING PEOPLE	Preferred Option	Mr Chris Baker	Government Office for London	Similar issues to CP14 [i.e. very general and not locally distinctive]
CORE POLICY 15: SUPPORTING PEOPLE	Preferred Option	Mr Giles Dolphin	Planning Decisions Manager Greater London Authority	Objection: The current wording of this policy is not in general conformity with London Plan Policy 3A.5 which requires that DPD policies should seek to ensure that all new housing is built to lifetime homes standards and that 10% of new housing is designed to be wheelchair accessible or easily adaptable for wheelchair users. The current wording of the policy suggests that the Council will merely support lifetime homes standards and wheelchair accessible housing in particular areas. Objection: The current wording of the policy is not in general conformity with London Plan Policy 3A.14 which requires that DPD policies should protect existing gypsy and traveller sites, set criteria for identifying the suitability of new sites and identify new sites where shortfalls are identified. London Plan Table 3A.3 (to be updated through revisions to the Housing SPG) identifies that there are no unauthorised or authorised sites in the London Borough of Enfield. The current wording of the policy does set out locational criteria for new sites and this is welcomed. In order to be in general conformity this policy must clearly state that the Council will protect sites (as and when these are created) and that the Council will identify new sites in their Sites Schedule in accordance with the locational criteria where there is an identified need for such. Comment: London Plan policies 3A.5 and 3A.14 place specific requirements on DPD policies. The suggestion in the supporting text of this policy that elements of these policies would be included within the proposed 'Development Management Document' which is currently intended to be an Supplementary Planning Document is clearly not in general conformity with the London Plan. Such an approach would significantly harm the implementation of these policies by inappropriately diminishing their weight in planning decisions. As suggested in the comments above regarding paragraph 2.2.17 of the Core Strategy Preferred Options the current approach to these documents should be fully reviewed. Comment: The policy is in general conformity with London Plan policies 3A.13 and 3A.17.

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CORE POLICY 16: CHILDREN & YOUNG PEOPLE	Preferred Option	Mr Andrzej Warhaftig	Business Manager Enterprise Enfield	Where cycling is being encouraged (and as it should be) the routes should be free of motor vehicles, and not just cycle lanes marked on the existing road structure (which tends to encourage additional parking).
CORE POLICY 16: CHILDREN & YOUNG PEOPLE	Preferred Option	Mr Mark Hayes	The Chair Enfield Housing Association Forum	CORE POLICY 16 This policy should be strengthened to reflect the central role of school buildings and facilities, the "Extended Schools" initiative and Enfield's own vision for its school premises.
CORE POLICY 16: CHILDREN & YOUNG PEOPLE	Preferred Option	Mr Chris Baker	Government Office for London	Similar issues to CP14 [i.e. very general and not locally distinctive]
CORE POLICY 16: CHILDREN & YOUNG PEOPLE	Preferred Option	Mr Stephen Conroy	Deputy Chief Executive Enfield Primary Care Trust	The PCT welcomes the emphasis the Council places on improving the health, lives and prospects of young people within the borough. This again will support the development of 'hub and spoke' models of care as such facilities will be young people friendly in terms of both opening hours and staff training. As mentioned above, the opportunity to co-locate appropriate services in Council developed properties would be welcome.
CORE POLICY 16: CHILDREN & YOUNG PEOPLE	Preferred Option	Ms Vilna Walsh (First Plan)	Director National Grid Property Holdings	National Grid support the broad thrust of Core Policy 16. However, this is on the basis that the implementation of this policy is fully supported by up-to date, robust and credible assessment of need. The criteria for assessing planning applications and in particular requirements for children's play space in new developments (whether this be on-site or via contributions towards off-site provision) should be clearly detailed within an appropriate SPD or other Development Plan Document.

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CORE POLICY 16: CHILDREN & YOUNG PEOPLE	Preferred Option	Mr Giles Dolphin	Planning Decisions Manager Greater London Authority	Objection: This policy currently fails to include criteria based approach for the provision and expansion of education facilities as required by London Plan Policy 3A.24. The supporting text suggests that these would be included within the 'Development Management Document' SPD. This would significantly harm the implementation of this policy. Criteria such as these should be included within a DPD. Objection: This policy currently fails to reflect London Plan Policy 3A.25 which requires DPD's to address the needs of the higher and further education sectors within the Borough. Objection: This policy currently fails to adequately reflect the requires of London Plan Policy 3D.13 and the Mayor's SPG on providing for children's and young people's play and informal recreation. Either this policy or another suitable policy needs to ensure that developments make adequate provision for play based on the expected child population and having regard to an assessment of need and provision in the area. The Mayor's SPG provides more guidance on this, including adoption of a benchmark provision of 10 sq.m. per child. The supporting text suggests that standards for children's play space would be included within the 'Development Management Document' SPD. Securing this provision would be given greater certainty and weight if such standards were included within a DPD.
CORE POLICY 16: CHILDREN & YOUNG PEOPLE	Preferred Option	Mr Giles Dolphin	Planning Decisions Manager Greater London Authority	Core Policy 16 does not adequately reflect the requirements of London Plan policy 3D.13 and the Mayor's SPG on providing for children's and young people's plan and informal recreation, in that it does not make clear that new residential developments should make provision, based on expected child populations. It is suggested that the standards for children's play space should be included in DPD policy
Economic Development & Enterprise: the core policies	6	Mr Giles Dolphin	Planning Decisions Manager Greater London Authority	The broad approach to employment is welcomed, however the policy needs to reflect the Mayor's SPG on Industrial Land, which has recently been published, as well as London Plan policy. In particular the definitions of employment need to be reviewed and the identification of locally important sites should be carried out in the context of the criteria set out in the SPG.
Introduction	6.1	Mr Peter O'Brien	Partnership Manager Learning Skills Council	The Learning and Skills Council supports the strategic objectives (12 and 13) that frame the core policies on economic development and enterprise.

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Introduction	6.1	Mr John McGill	Deputy Director North London Strategic Alliance	Within the bullet points in the introduction reference should be made to the fact that there is a lowering of job densities within the Upper Lee Valley. The point which refers to between 1 and 6 hectares of employment land being available for release seems low in the context of the pan-London Study. This discussion also needs to consider the point that within mixed use developments the employment rates can increase considerably. There are a number of examples around London where this has been the case.
Introduction	6.1	Mr Giles Dolphin	Planning Decisions Manager Greater London Authority	Support with conditions: Objectives 12 and 13 are welcomed and supported subject to the inclusion of a commitment to tackling barriers to employment in Objective 12. Although the need to develop skills is included as a factor which enables residents of the borough to access the labour market, there are a number of additional important barriers to employment that should also be addressed. The comments on Core Policy 18 give more information on this.
Scale & location of employment development	6.2	Mr Peter O'Brien	Partnership Manager Learning Skills Council	Core Policy 17: This version of the plan provides additional clarification of the limited release to other uses of land designated for employment and this is welcome. Taken also with greater clarity on the nature of employment that is planned for the Borough (in Core Policy 18), this gives a very helpful context for the planning of future programmes of skills development. Paragraph 6.3.5: We believe that the word 'synchronise' is more appropriate than 'refine' in sentence two. Core Policy 18: This provides a very helpful framework around which to plan skills development. The Core Policy could incorporate an explicit commitment to implement an agreed economic development strategy, incorporating skills and employment. In its current form, it is unclear whether the weight of effort on promoting economic prosperity is seen as coming from existing businesses, inward investment or new business start-ups. It might prove useful to clarify this aspect of the vision because: - if the emphasis is on growing existing businesses, it will be necessary to ensure that such businesses have the scope to expand within the Borough and that there is a full infrastructure of support, including a robust workforce development package, to encourage that growth; - if the emphasis is on business start-up, the nature of land-use and the support package will be different; - if the emphasis will be on inward investment, it may be necessary to cease supporting some initiatives to prioritise resources to a more targeted investment campaign. We would like to see a specific policy commitment that developers will be required to maximise the benefits of employment through local recruitment and skills development programmes for their workforce.
Scale & location of employment development	6.2	Ms Anna Chapman	Planner British Waterways-London Region	See British Waterways comments to para 3.2.4 Economic Development & Enterprise
Scale & location of employment development	6.2	Ms Anna Chapman	Planner British Waterways-London Region	6.2.14 The canal network (including the River Lee Navigation) runs through all of the Boroughs in the North London Joint Waste Plan. To enable a joined up strategy for the transportation of waste British Waterways therefore recommends that waste management sites should be located canalside to enable them to utilise the canal for transporting waste and recyclables by water, as

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				at the Edmonton London Waste Centre site.
CORE POLICY 17: THE SCALE AND LOCATION OF EMPLOYMENT ACTIVITIES	Preferred Option	Enguang Lee	Planning Advisor Fairview New Homes Ltd	(This is an excerpt from our written representation dated 26 March 2008 re: Land at Bull Lane, Edmonton) In order to facilitate the release of inappropriate employment land, the Core Strategy Preferred Options must accommodate some changes. We welcome the appropriate flexibility in Core Policy 17, and the safeguarding of Strategic Employment Locations (SEL) as defined under the London Plan. We also welcome the identification of Locally Significant Employment Sites (LSEs) and the progressive release of sites outside of these designations - where they do not meet the needs of modern industry and business. However, we do not support the proposed policy statement that this release will be concentrated on smaller industrial sites. As discussed earlier, appropriately sited large sites for housing are in short supply, therefore, there is a counter intuition in wording a policy to resist the redevelopment of any larger industrial sites. Additionally, the Council acknowledge that there was a theme within the responses to the Core Strategy Issues and Options Paper that the loss of small scale business locations is having a detrimental effect. It thus makes little sense to encourage their further loss for housing whilst maintaining inappropriately sited large scale industrial sites. We also have reservations over the early illustrative proposals map that identifies the Land at Bull Lane site as part of a Locally Significant Employment Site. We note that this is currently purely illustrative and based upon the 2006 Employment Land Study, but, at this early stage in the LDF process, the precise allocation of land use should not be prejudiced by illustrating it in such a way, this is not consistent with the pursuit of a fair democratic process and instead such decisions should be evoked as part of the Site Specific Allocations DPD. Positively, however, we do note that the preferred policy states that the Council will: 'set out economic, land use and demand based criteria for the assessment, management and release of LSEs and other smaller industrial sites for other uses, principally housing; where it can be demonstrated they no longer meet the needs of modern industry and business'. We support this policy solution, subject to the addition of the requirement to hold frequent reviews to respond to changing market conditions and the removal of the word 'smaller' from the statement 'and other smaller industrial sites' as discussed earlier.
CORE POLICY 17: THE SCALE AND LOCATION OF EMPLOYMENT ACTIVITIES	Preferred Option	Miss Faye Wilders	Assistant Planner RPS Group PLC	These representations object to the current wording of the policy and propose that the Core Policy 17 be amended to refer to Strategic Industrial Locations and not Strategic Employment Locations in accordance with the wording of the London Plan and the Mayor's draft Industrial Capacity SPG (October 2007). Paragraph 4.4 of the new draft SPG states: 'The SIL framework (formerly known as the Strategic Employment Locations framework) has In this regard, it is considered that the policy should be amended to reflect the SPG's current wording and refer to SILs not SELs. It is also recommended that a reference to the definition of SILs in the Glossary be included as part of Policy 17. This would provide additional clarity within the policy, as there is currently no reference to the components of land that comprise SILs. In the Glossary of the Core Strategy it provides a definition of SELs and states that in the London Plan they are considered to comprise Preferred Industrial Locations, Industrial Business Parks and Science Parks. This has been changed in the new publication of the London Plan. The London Plan Consolidated with Alterations since 2004 (February 2008) now refers to Strategic Industrial Locations and

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				states in Annex 2 that: 'Strategic Industrial Locations in the London Plan involve two types of areas: Industrial Business Parks (IBP) for business requiring a high quality environment, and Preferred Industrial Locations (PIL) for businesses with less demanding requirements'. It is considered that the Glossary should be updated to reflect the up to date London Plan. Paragraph 1.1 of PPS11 states that DPDs should be in conformity with the RSS for the area, and it is considered that the Core Strategy would need to make these minor amendments to be in conformity with the London Plan.
CORE POLICY 17: THE SCALE AND LOCATION OF EMPLOYMENT ACTIVITIES	Preferred Option	James Stevens	Regional Planner (London) Home Builders Federation Ltd	Core Policy 17: The Scale and Location of Employment Activities In line with the Mayor's draft Industrial Capacity SPG, the HBF supports the release of surplus industrial capacity to support strategic objectives, and in particular housing, where the evidence supports this. We note in the draft SPG that Enfield is marked as one of those boroughs in the North sub-region where a limited (as opposed to a restricted) transfer of land from former industrial can be considered. Page 20 of the draft SPG states that any industrial land released must be re-used to meet strategic as well as local priorities and that housing, including affordable housing, will be the foremost priority (see SPG 1, viii on p.21), closely followed by social infrastructure such as health, education, emergency services etc.
CORE POLICY 17: THE SCALE AND LOCATION OF EMPLOYMENT ACTIVITIES	Preferred Option	Mr Andrzej Warhaftig	Business Manager Enterprise Enfield	Core Policy 17 does not cover the whole range of enterprise needs in terms of office space, and affordable business units (incubation space, easy in, easy out terms). The need for such to be located in areas of activity such as town centres to add to the use mix. Whilst we have noted all the comments about logistics, these do need to be located in the east of the borough for the local north - south roads. This then begs the question of the long ago proposed Mollison Avenue link to the M25.
CORE POLICY 17: THE SCALE AND LOCATION OF EMPLOYMENT ACTIVITIES	Preferred Option	Mr Chris Baker	Government Office for London	This policy seems to be partly general and partly specific to Enfield. If retained into the final plan, it should really be revised such that it focuses on the locationally specific issues relating to employment activity.
CORE POLICY 17: THE SCALE AND LOCATION OF EMPLOYMENT ACTIVITIES	Preferred Option	Mr Matthew Roe (CgMs)	Senior Associate Director Metropolitan Police Authority	As outlined in our previous representation dated 30th May 2007, the Borough's Patrol Base is in operation in the Cambridge Business Park and there is a need for the development of custody centre or specialist facilities within the Borough. Facilities such as the patrol centres operate 24/7 and require good accessibility to the local road network. Employment areas/ sites are often ideal locations to support these facilities. Although the last point of Policy 17 allows the release of Locally Significant Employment Sites and other smaller industrial sites for other uses, it makes specific reference to housing which would exclude the police facilities discussed above. This does not accord with Policy 3B.4 of London Plan which states surplus employment land is appropriate for alternative uses including community uses (this definition includes police facilities).

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				Accordingly it is recommended Policy 17 recognises policing facilities as an appropriate alternative use to employment land, by making specific reference to 'policing facilities' within the 5th bullet point.
CORE POLICY 17: THE SCALE AND LOCATION OF EMPLOYMENT ACTIVITIES	Preferred Option	Ms Jill McGregor (GL Hearn)	Tesco Stores Ltd	Tesco supports the objectives of Core Policy 17 in particular, facilitating the Structured Consolidation of the Central Leaside SEL to promote intensification and managed release of unproductive or inefficient sites for alternative uses. This approach would meet the objectives of PPS1, PPS3, PPS6, the London Plan and the Upper Lea Valley Opportunity Area for new housing, employment and environmental improvements.
CORE POLICY 17: THE SCALE AND LOCATION OF EMPLOYMENT ACTIVITIES	Preferred Option	Mr John McGill	Deputy Director North London Strategic Alliance	Within the section Core Policy 17 there does not seem to be any reference to the new London Plan policy on strategic industrial land. This section simply refers to strategic employment land.
CORE POLICY 17: THE SCALE AND LOCATION OF EMPLOYMENT ACTIVITIES	Preferred Option	Mr Patrick Blake	Network Strategy Highways Agency	It is noted that the Borough intends to extend that Freezywater Strategic Employment Location to include Innova Park. The HA would be concerned about significant growth in employment uses at this location. Developments that are proposed in close proximity to trunk road junctions have the greatest potential to generate traffic on the SRN. Therefore, as recommended in our response to the Core Strategy Issues and Options Report, we feel that it is essential that the Council undertakes a study to evaluate the impact of all development in the Upper Lee Valley / North East Enfield area on the SRN. This is discussed in paragraphs 28 and 29 below. We also refer you to our representations on the North East Enfield AAP Issues and Options Report. With regard to the identification of Locally Significant Employment Sites and the proposed release of 6 hectares of employment land, it is recommended that Enfield Borough should seek to safeguard sites with good access to public transport for travel intensive uses. In addition, the Council should seek to reallocate sites with poor access to public transport for less travel intensive uses. Whilst this may be delivered through the Site Specific Allocations document, it is recommended that Core Policy 17 should be updated to include these requirements. This would be in line with the recommendations of PPG13, paragraph 21 and would help to ensure the Plan meets with PPS12 (paragraph 4.24) Test of Soundness 4.

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CORE POLICY 17: THE SCALE AND LOCATION OF EMPLOYMENT ACTIVITIES	Preferred Option	Ms Vilna Walsh (First Plan)	Director National Grid Property Holdings	<p>References in the Core Strategy to Strategic Employment Locations (SELs) are taken to read as Strategic Industrial Locations (SILs) as now referred to in the London Plan Consolidated with Alterations since 2004 (published February 2008). Before considering the specifics of the Preferred Option –Core Policy 17 itself, NGPH would reiterate the concerns expressed in representations to the Issues and Options consultation regarding the robustness of the evidence base which has formed part of the reasoned justification for employment land policies in the Preferred Options Core Strategy. This appears to be largely predicated on the basis of the Enfield Employment Land Study produced by Halcrow and published in December 2006. Of key concern is the approach taken to the assessment and categorisation of existing employment sites in determining their potential for release. This is highlighted with particular reference to land in the ownership of National Grid where the assessment in the Study is at odds with the particular circumstances and characteristics of those sites. The National Grid sites are identified in the employment study as: Site EN09 Meridian Way Land (Otherwise known as the Teardrop site) Site EN014 Glover Drive (National Grid have an interest in a small area of this site accommodating the Leaside Road gas holder) Site EN026 Kimberley Road (Otherwise known as the Willoughby Lane site). The three sites are jointly identified in the Study as one of thirteen “Red Clusters” located throughout the Borough. A “Red Cluster” designation, the Study states, should apply to sites that “...typically contain vibrant and robust businesses, have predominantly good quality modern buildings and are reasonably well connected to existing transport systems.” This description does not accord in any way with the main characteristics of the National Grid sites. Nonetheless, on the basis of this erroneous qualitative classification the Employment Study advocates that any change of use of these sites should be strongly contested. Furthermore, with specific reference to the Willoughby Lane site, the Study ignores the fact that the site lies immediately adjacent to residential receptors and is divorced from the remainder of the Central Leaside Business Area by the rail way line which runs north south along the eastern boundary of the site. It is notable that the London Plan SPG on Industrial Capacity (March 2008) seeks to focus consolidation to the periphery of the SILs, especially where there is a barrier separating the area from the rest of the SIL. The Willoughby Lane site does not currently contribute to the Upper Lee Valley in any way as a productive or vibrant employment site. Indeed it is the “Green Cluster” classification in the Employment Study which most closely correlates to the characteristics of the National Grid sites, and particularly the Willoughby Lane site. Green Clusters are defined in the Study as typically “...run down, poorly connected to transport infrastructure (often through residential streets) and largely surrounded by sensitive receptors (such as housing). As a result it is recommended that an appropriate change of use is allowed for these clusters.” In quantitative terms the employment study suggests potential to release up to 6 hectares of employment land to 2016. The level of land which is identified for potential release is considered to be very much on the low side given the indicative industrial land release benchmarks set out in the London Plan SPG on Industrial Capacity. Notwithstanding this, the management of existing employment land must consider a range of policy objectives in considering the scale and location of employment generating activities including those for regeneration and provision of housing as well as site specific considerations. The likelihood that particular sites will be developed for employment purposes must also be a</p>

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				<p>key consideration. It is not simply a matter of having a certain level of employment land supply identified, there must also be a reasonable prospect that the supply identified will become available within the plan period. Sites such as the National Grid site at Willoughby Lane, particularly in terms of viability considerations, have very limited prospect for being brought back into productive employment use due to the prohibitive costs associated with the removal of the gas holders and required improvement and remediation works. There is as such no reasonable qualitative or quantitative basis on which to retain the National Grid sites for employment uses and an employment based designation would simply preclude the sites coming forward for development at all. In this context of the above, and notwithstanding the concerns raised in connection with the assessment of employment areas the following comments are made to the Preferred Option for Core Policy 17: Existing Strategic Industrial Sites, as confirmed in the London Plan and SPG on Industrial Capacity, are the main reservoir of industrial capacity. However, both documents advise that they must nevertheless be subject to periodic review and consolidation where appropriate to reconcile demand and supply. On this basis, the inclusion within the Preferred Option of references to planning for structured consolidation of the Central Leaside SEL to promote intensification and the managed release of unproductive or inefficient sites to meet the objectives of the London Plan for the Upper Lee Valley Opportunity Area for new housing, infrastructure and other appropriate uses, are fully supported. However, consideration of release of existing sites in the SILs will importantly also need to consider what prospect there is of a particular site coming forward for employment uses in terms of site specific considerations and constraints. It is indicated the draft Document that the implementation of this approach will in part be pursued via the Area Action Plan for Central Leaside and National Grid will make appropriate representations to that document in this context. The following wording, shown in bold and underlined, should be included within the 4th bullet point of Core Policy 17: <u>Planning for a structured consolidation of the Central Leaside SEL to promote intensification and the managed release of unsuitable, unproductive or inefficient sites as well as sites which are constrained for site specific reasons from being developed for employment generating activities, to meet the objectives of the London Plan for the Upper Lee Valley Opportunity Area for new housing, infrastructure, and other appropriate uses.</u></p>
CORE POLICY 17: THE SCALE AND LOCATION OF EMPLOYMENT ACTIVITIES	Preferred Option	Miss Renee Goodwin (GVA Grimley Ltd)	Principal Planner La Salle Investment Management	<p>Comments: The policy refers to Enfield's employment offer, seeking to ensure that employment land and premises are used more effectively and efficiently, and that sufficient land and premises are available for existing and future businesses by safeguarding the Borough's Strategic Employment Locations (SELs) set out in the London Plan. The policy also refers to the adoption of a plan to monitor and manage the approach to release up to 6 hectares of employment land for other uses up to 2016. Release will be concentrated in smaller industrial sites outside the SEL, as part of structure consolidation and intensification in Central Leaside SEL. The policy states that the Council will continue to protect and improve Enfield's employment offer by planning for a structured consolidation of the Central Leaside SEL to promote intensification and the managed release of unproductive or inefficient sites to meet the objectives of the London Plan for the Upper Lee Valley Opportunity Area for new housing, infrastructure, and other appropriate uses. Proposed Changes: Amend the policy to recognise</p>

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				that sites, particularly for the area around Angel Road, (where retail development such as IKEA and Tesco is surrounded by underused or vacant employment sites) should be optimised in accordance with the goals of sustainable and efficient use of land. Under this approach, the underused and vacant employment sites could be selectively redeveloped, using some mixed use development, including residential, as a catalyst for upgrading the employment uses. We consider that it would make most sense to promote mixed use development in the area around IKEA and Tesco, where retail development has already compromised the integrity of the SEL and there are surrounding underused and vacant employment sites. Amend policy to enable transformation of certain areas within the SEL through intensification and introduction of mixed use development. This will encourage transformation of the area including different types of employment and a complementary range of other uses including residential. This would act as a catalyst for regeneration of the area and would have a positive impact on the prosperity of surrounding communities, whilst also providing a new source for the supply of housing.
CORE POLICY 17: THE SCALE AND LOCATION OF EMPLOYMENT ACTIVITIES	Preferred Option	Caroline Dawson (Planning Potential)	Director Kier Property Developments Ltd and the Ponders End Trust	The Core Policy aims to protect and improve Enfield's employment offer by, inter alia, safeguarding the Borough's Strategic Employment Locations, such as the Brimsdown area. This approach, however, could put at risk the objectives of Core Policy 10 towards the delivery of significant levels of new housing in the Upper Lee Valley. Considering the situation of the Brimsdown Employment Area and its barrier position between residential communities to the west and the Lee Valley to the east, such an approach would also put at risk the achievement of properly mixed and integrated communities where living and employment can co-exist in a sustainable manner. Our clients, therefore, object to Core Policy 17 - In particular, in its safeguarding of the SEL's and its failure to recognise that they may be suitable for the release of employment land such as to facilitate mixed use developments.
CORE POLICY 17: THE SCALE AND LOCATION OF EMPLOYMENT ACTIVITIES	Preferred Option	Duncan Bennett (CgMs Consulting)	Senior Associate Director Fairview New Homes Ltd	Fairview new homes supports the last bullet point of core policy 17 which recognises that some lses's and smaller industrial sites could be released for housing. This is in line with paragraph 44 of PPS3 which states that in developing their previously developed land strategies local planning authorities should consider whether sites that are currently allocated for industrial or commercial use could be more appropriately re-allocated for housing. It is also in line with paragraph 69 of PPS3 which states that in deciding planning applications, local planning authorities should have regard to using land effectively and efficiently.
CORE POLICY 17: THE SCALE AND LOCATION OF EMPLOYMENT ACTIVITIES	Preferred Option	Philip Murphy	Associate RPS	The Preferred Options acknowledge the designation of Central Leaside as a Strategic Employment Location (renamed Strategic Industrial Location within the London Plan consolidated changes) as defined by the London Plan. The document also recognises the change in emphasis towards the potential release of industrial land where it is demonstrated to be surplus to requirements, as endorsed in the approved London Plan Further Alterations. As such and having regard to the conclusions of the last Borough wide employment land assessment undertaken in 2006, Core Policy 17 identifies the potential for only up to 6ha of land to be released to 2016. This appears to conflict with the 4th criteria of the same policy which promotes the 'structured consolidation of the Central Leaside SEL to promote intensification and

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				the managed release of unproductive or inefficient sites', as well as the Preferred Option for Central Leaside promoted in Chapter 10 of the document. Indeed a release of 'up to 6ha' at Central Leaside would not deliver the vision for the area as proposed. In view of the scale of change anticipated at Central Leaside proposed in the London Plan, the North London Strategic Alliance Vision and the London Development Agency 'North London Development and Investment Framework', and given that 33% of premises at Central Leaside are known to be vacant (para 6.2.4), it is recommended that an up-to-date assessment be undertaken to identify the appropriate scale of release of land at Central Leaside. It is therefore suggested that the 4th criteria of Core Policy 17 is altered to read: 'An independent assessment of industrial land supply and demand is to be undertaken to inform the structured consolidation of Central Leaside SEL to promote intensification and the managed release of unproductive or inefficient sites to meet the objectives of the London Plan for the Upper Lee Valley Opportunity Area for new housing, infrastructure and other appropriate uses'.
CORE POLICY 17: THE SCALE AND LOCATION OF EMPLOYMENT ACTIVITIES	Preferred Option	Mr Giles Dolphin	Planning Decisions Manager Greater London Authority	Objection and comment: The intent and broad approach of the policy is welcome but the policy should be reviewed to reflect the latest version of the London Plan and the recently published Industrial Land SPG. The policy or supporting text should include a definition of employment consistent with that in the above SPG. The extension of the Freezywater Strategic Industrial Location to include part of Innova Park is supported subject to agreement of the exact boundary on the Proposals Map. The identification of Locally Significant industrial sites outside of SIL's should be subject to a robust assessment of strategic and local demand and meet the objectives set out in the SPG. A plan, monitor and manage approach to the release of industrial land which focuses on release of smaller sites is required by strategic policy and the policy should fully reflect this. The figure for industrial land release of 6 hectares is inaccurate and should be revised in line with the SPG. Comment: Reference is made to a structured consolidation of the Central Leaside SEL (now SIL). This policy must make reference to the need to deliver the necessary public transport provision to ensure sustainable travel behaviour, the need for land for transport purposes to support growth and the need to support freight requirements as part of any release of industrial land for other uses.
CORE POLICY 17: THE SCALE AND LOCATION OF EMPLOYMENT ACTIVITIES	Preferred Option	Enguang Lee	Planning Advisor Fairview New Homes Ltd	In order to facilitate the release of inappropriate employment land, the Core Strategy Preferred Options must accommodate some changes. We welcome the appropriate flexibility in Core Policy 17, and the safeguarding of Strategic Employment Locations (SEL) as defined under the London Plan. We also welcome the identification of Locally Significant Employment Sites (LSEs) and the progressive release of sites outside of these designations - where they do not meet the needs of modern industry and business. However, we do not support the proposed policy statement that this release will be concentrated on smaller industrial sites. As discussed earlier, appropriately sited large sites for housing are in short supply, therefore, there is a counter intuition in wording a policy to resist the redevelopment of any larger industrial sites. Additionally, the Council acknowledge that there was a theme within the responses to the Core Strategy Issues and Options Paper that the loss of small scale business locations is having a detrimental effect. It thus makes little sense to encourage their further loss for housing whilst maintaining inappropriately sited large scale industrial sites.

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CORE POLICY 18: PROMOTING ECONOMIC PROSPERITY AND DEVELOPING THE SKILLS AND EMPLOYMENT OPPORTUNITIES OF LOCAL PEOPLE	Preferred Option	Mr Andrzej Warhaftig	Business Manager Enterprise Enfield	We do not consider that the proposals in Core Policy 18, or Core Policy 17, meet Strategic Objective 13. Given the issues in Enfield, as outlined in 6.3.3 and 6.3.4, there needs to be a more supportive approach to the requirements of the most disadvantaged in the community, and to overcome what will be a declining situation in terms of worklessness. The strategy needs to encompass training, education, and elements to support people into self-employment by providing assistance to overcome the standard barriers. The policy must include office space for the planned increases (6.3.1/6.3.2) and these should be town centre based to assist in the mix, and provide customers for the retail, whilst living in the housing identified within the Core Strategy. There should be incubation enterprise units, with easy in and out options on a stepped rental basis. This section needs to be developed in parallel with the other sections, to include the social and leisure activities. All the above in areas with good, green, public transport reach. Overall, there needs to be a more fundamental, far reaching review of regeneration, enterprise, skills, education and the tackling of worklessness, than proposed here.
CORE POLICY 18: PROMOTING ECONOMIC PROSPERITY AND DEVELOPING THE SKILLS AND EMPLOYMENT OPPORTUNITIES OF LOCAL PEOPLE	Preferred Option	Mr Chris Baker	Government Office for London	This policy seems to be partly general and partly specific to Enfield. If retained into the final plan, it should really be revised such that it focuses on the locationally specific issues relating to employment activity.

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CORE POLICY 18: PROMOTING ECONOMIC PROSPERITY AND DEVELOPING THE SKILLS AND EMPLOYMENT OPPORTUNITIES OF LOCAL PEOPLE	Preferred Option	Mr John McGill	Deputy Director North London Strategic Alliance	Core Policy 18 promotes an economic prosperity. There should be some reference within this section on the role of town centres as employment centres – this is in part because town centres contain jobs which are more suitable for people at the lower skills levels and they are relatively high density in terms of job numbers per hectare. There is evidence that town centres also provide local jobs which are more accessible for people with specific needs, such as lone parents and those who also need to provide a caring function.
CORE POLICY 18: PROMOTING ECONOMIC PROSPERITY AND DEVELOPING THE SKILLS AND EMPLOYMENT OPPORTUNITIES OF LOCAL PEOPLE	Preferred Option	Mr Patrick Blake	Network Strategy Highways Agency	It is noted that the Council proposes to focus storage, distribution and logistics in areas of "good access to the strategic road network and where the use of rail and water based transport can be maximised". The HA welcomes efforts to encourage the use of sustainable transport, however we are concerned that the policy as presently worded could lead to a significant impact on the SRN. In particular we would refer you to the comments in paragraph 7 above regarding the potentially significant impact the increase in HGVs may have on the SRN. Following this, as noted above, it is recommended that an evaluation of the transport impacts associated with all types of development likely to impact the SRN (including storage, distribution and logistics) is conducted. Emerging policies should identify that developers will be expected to mitigate any residual impact upon the SRN, whether caused by a specific sites in isolation or in combination with others. In addition, point 3 of Core Policy 18 states that the Council will seek to ensure that the benefits of regeneration in the Upper Lee Valley and Central Leaside areas are maximised "by improving connectivity, including transport links". It should be noted that national policy as outlined in paragraph 8 of DfT Circular 02/2007 (Planning and the Strategic Road Network) states that Boroughs should give preference to improvements to sustainable transport. In order that this national guidance is reflected in the Core Strategy, it is recommended that Core Policy 18 is reworded to state that benefits of regeneration should be maximised "by improving sustainable transport links". This will help to ensure that the document is in line with PPS12 (paragraph 4.24) Test of Soundness 4.

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CORE POLICY 18: PROMOTING ECONOMIC PROSPERITY AND DEVELOPING THE SKILLS AND EMPLOYMENT OPPORTUNITIES OF LOCAL PEOPLE	Preferred Option	Austin Mackie (DTZ Development & Planning)	Director St Modwen	In addition to the bullet points that appear to focus on traditional Class-B employment, the CS should emphasise the importance of developing the already significant contribution of retail and service employment sectors.
CORE POLICY 18: PROMOTING ECONOMIC PROSPERITY AND DEVELOPING THE SKILLS AND EMPLOYMENT OPPORTUNITIES OF LOCAL PEOPLE	Preferred Option	Mr Giles Dolphin	Planning Decisions Manager Greater London Authority	Support with conditions: This policy is supported subject to the inclusion of an additional bullet point that seeks to address barriers to employment, for example, the provision of good quality, affordable childcare, the provision of flexible job opportunities, improvement of physical access issues, including inadequate public transport links and the improvement of educational and skills attainment. The promotion of economic prosperity should ensure land for transport and with transport functions is protected to assist in this process and the bullet points should be amended or added to accordingly.
CORE POLICY 18: PROMOTING ECONOMIC PROSPERITY AND DEVELOPING THE SKILLS AND EMPLOYMENT OPPORTUNITIES OF LOCAL PEOPLE	Preferred Option	Mr Giles Dolphin	Planning Decisions Manager Greater London Authority	Core Policy 18 seeks to promote economic prosperity and is generally supported. Although it does make reference to targeting training and employment agreements, there should be a more explicit reference to tackling barriers to employment by seeking provision of good quality, affordable childcare, provision of flexible job opportunity, improvement of physical access issues and improvement of educational and skills attainment.

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The Open & Built Environment: the core policies	7	Mr Giles Dolphin	Planning Decisions Manager Greater London Authority	The approach to open space is generally welcomed however, it is important that the hierarchy of open spaces reflect the London Plan hierarchy. In terms of biodiversity the policy should also protect legally protected species and BAP priority species and should seek to reduce the areas of deficiency in access to nature.
Introduction	7.1	Ms Karen Foster-	Planning Liaison Officer Environment Agency	Strategic objectives - the wording should be changed to read: 2) To create and increase the areas of biodiversity and protect and enhance areas rich in biodiversity. 15) To create enhanced and accessible learning, leisure and recreational opportunities and improve access and quality of green areas and the Lee Valley Regional Park, through the creation of green corridors and improvements to the Blue Ribbon Network, particular for children and young people. 16) (end of objective) good urban and natural environmental design. 17) To safeguard established communities, the quality of the local environment and make improvements where possible.
Introduction	7.1	Ms Karen Foster-	Planning Liaison Officer Environment Agency	Open and built environment in Enfield - (new bullet point) - Develop improved access across the Borough, through the creation and improvement of green corridors and Blue Ribbon Network (green strand approach*) * the green strand approach is basically the management of areas around rivers in a sympathetic manor to the river and the environment. Please contact John Bryden the Biodiversity Officer for more information [contact details provided]
Introduction	7.1	Mr Giles Dolphin	Planning Decisions Manager Greater London Authority	Support and comment: These objectives are welcomed and supported. Paragraph 7.3.4 refers to walking and cycling being promoted by providing links through the Borough's open spaces and built up areas. Further development of this approach, including mapping, would be welcomed in later more detailed documents.
Green belt & countryside	7.2	Ms Karen Foster-	Planning Liaison Officer Environment Agency	7.2.1 - Should mention the Turkey, Salmons and Pymmes Brook which have shaped, along with the River Lee, the whole of the Enfield Borough, including the agricultural land to the west. These rivers have a great potential to be restored, resulting in huge improvements in biodiversity, green corridors (linking the east and west Enfield, including pathways), recreational and education facilities including fishing and improving access to nature, which the North London River Restoration Document high lights a number of areas within Enfield Borough that is lacking.

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Green belt & countryside	7.2	Mr Stuart Slatter (Planning Potential)	Planning Consultant Diocese of London	Overall, we are in support of the identification in the Preferred Options that there needs to be a review of the Green Belt boundary. However, we believe that there are a few amendments that are required in order to ensure that inappropriately restricted key opportunity sites – such as the Land at Enfield Road Site [see attached resubmitted site specific representation] – are brought forward for more much needed housing and associated uses. We concur with the green belt strategic objective: “to protect and enhance Enfield’s invaluable green resources, retaining the open character of the Borough and safeguarding the Green Belt and other open space...” We would add that Core Policy 19 seems an appropriate means to achieve this objective, particularly the policy to: “Maintaining the protection of the green belt and ensuring that its detailed boundary is robust and defensible” Whilst we agree with the ‘Reasoned Justification’ that in meeting this aim, there is a need for a green belt boundary review as part of the core strategy we do object to the identification of the boundary changes. Although the preferred boundaries identified in Appendix 2 are acknowledged as currently only being ‘Preferred’, the boundaries should be subject to a detailed assessment at the Core Strategy stage. By limiting the boundary review to the sites identified, this fails to assess the range of site proposals which could contribute to the delivery of housing within the Borough. The site proposal previously submitted by the Diocese in regards to Land at Enfield Road, Enfield, is one such site that would be prejudiced. It is therefore requested that the detailed boundaries of the Green Belt are again properly reviewed before the Submission Document is prepared, and that any site representations are fully considered as part of this examination.
Green belt & countryside	7.2	Mr Will Thompson	Associate Director - Planning White Young Green	Hadley Wood Golf Club is supportive in principle of paragraph 7.2.4 and paragraphs 2.3 & 2.4 of Appendix 2 of the Council’s Core Strategy Preferred Options Report, which show that the Council agrees with the need to review the detailed Green Belt boundary, including land adjacent to Beech Hill. Hadley Wood Golf Club is also supportive in principle of the intentions of Core Policy 19 (Green Belt & Countryside), which states that the Council will continue to protect and enhance Enfield’s Green Belt and Countryside and recommends that the Green Belt’s detailed boundary is robust and defensible.
Green belt & countryside	7.2	David Phillips (GL Hearn)	Planning Director Hadley Homes	7.2: Green Belt and countryside with particular reference to 'Preferred Option Number Green Belt and Countryside' and paras. 7.2.1 to 7.2.9 and the illustrative maps in Appendix 2 referred to under para. 7.2.5 The overall strategic objective of safeguarding the Green Belt is supported. However, given our objections on housing land supply (reference 5.2: Meeting housing requirements with particular reference to paras. 5.2.14 to 5.2.19 of the Core Strategy) and the Council’s own acknowledgement in para. 7.2.4, there needs to be a clear commitment in the Core Strategy to reviewing local boundaries to accommodate new housing development. The Core Strategy should therefore state that there will be limited Green Belt releases to accommodate additional housing. The Core Strategy should expressly state that revised local Green Belt boundaries will be defined on the Proposals Map accompanying the Site Allocations DPD. We note that there were a number of representations to the Core Strategy Issues and Options stage, as outlined in paras. 2.2 to 2.4 of Appendix 2 to the Preferred Options Core Strategy. Whilst we agree with the Council that these representations should be considered in

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				<p>the preparation of the Proposals Map this should relate to a separate Site Allocations DPD and not the Core Strategy. The Council should be seeking to inform the Core Strategy by undertaking a Borough wide review of Green Belt boundaries to identify those sites suitable for release as it acknowledges that it is required to do so by virtue of para. 7.2.4. A strategic Landscape and Visual Impact Assessment of potential locations for release should be conducted, encompassing the Guidelines for Landscape and Visual Impact Assessment (GLVIA) published by the Landscape Institute and the Institute of Environmental Management and Assessment 2002, and Landscape Character Assessment (LCA). Guidance for England and Scotland, published by the Countryside Agency and Scottish National Heritage 2002. The strategic review should combine information and desktop reviews with on-site surveys and appraisals. The study should provide an assessment of the principal landscape and visual issues, relating to strategic areas and should be based on a combination of site based assessment and information review. The areas should be assessed in terms of landscape character and sensitivity and visual amenity and sensitivity. Particular attention should be paid to the implications of the Green Belt designation and of the potential effects upon the overriding objectives of this policy designation. Furthermore where limited local scale land release in the Green Belt can be identified, the Council should set out in the Core Strategy and subsequent Site Allocations DPD measures to enhance the surrounding Green Belt and incorporate design features that reinforce and secure defensible Green Belt boundaries that are sustainable into the long term. The provisions for the release of Green Belt land are not expressly stated. This is inconsistent with the need for Green Belt release as identified in para. 7.2.4 of the Core Strategy and our own analysis which demonstrated that the Council has a serious shortfall in housing land supply. In order to make the Core Strategy it is recommended that the following additional paragraphs are added to Core Policy 19:"The Council recognises that there will need to be limited Green Belt releases to accommodate additional housing. Revised local Green Belt boundaries will be defined on the Proposals Map accompanying the Site Allocations DPD. In determining these releases the Council will carry out a Borough wide review of Green Belt boundaries to identify those sites suitable for release. For any released sites the Council will expect measures to enhance the surrounding Green Belt and incorporate design features that reinforce and secure defensible Green Belt boundaries that are sustainable into the long term. "Given the need to review the Green Belt boundaries we would question the appropriateness of enclosing at Appendix 2 the overview maps - namely 2.1, and 2.2 which show existing detailed Green Belt boundaries (1a, 2a, 3a and 4a). These maps add to the confusion on the future of Green Belt boundaries and should be deleted. Finally, it is recognised that the appropriate forum for the identification of sites for development is either through the Proposals Map Site Allocations DPD or relevant Area Action Plan. However it is worth stating at this stage that the allocation of Hadley Homes land interest incorporating Waterworld and Kingswood Nursery and associated land at the junction of Bullsmoor Lane and Great Cambridge Road, Enfield (see attached plan) will facilitate the delivery of housing at a highly sustainable location within the Plan period, thereby assisting in making the objectives of the Plan sound.</p>

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CORE POLICY 19: GREEN BELT AND COUNTRYSIDE	Preferred Option	Mr Andrzej Warhaftig	Business Manager Enterprise Enfield	Any green belt development should only be as identified in the notes.
CORE POLICY 19: GREEN BELT AND COUNTRYSIDE	Preferred Option	Mr Mark Matthews	Thames Water Property	Thames Water have a number of essential operational sites in Enfield with Green Belt and with Open Space designations, for example, Chingford South Water Treatment Works, William Girling Reservoir and King George V Reservoir. Our sites may require future development and expansion to meet environmental, social and economic change, as well as standards specifically posed by population and economic growth, tighter environmental standards and from the impacts of climate change. Thames Water's experience at strategic water and sewage treatment sites in the MOL, Green Belt and protected open space, is that there is a lack of recognition of the functions of sewage and water treatment and this often leads to delay in obtaining necessary planning consents for essential operational development. It is essential that there is provision of adequate water and wastewater infrastructure to service existing and new development to avoid unacceptable impacts on the environment. With potential delays to achieving the necessary upgrades to our assets, the ability of our infrastructure to provide water and to treat additional wastewater flows to the required regulatory standards, is undermined. As highlighted in the Planning Inspectorate's published document "Development Plans Examination – A Guide to the Process of Assessing the Soundness of Development Plan Documents", to achieve a 'sound' DPD adequate account should be taken of the relationship between the proposals in the DPD and other requirements, such as those of utility companies and agencies providing services in the area, including their future plans or strategy and any requirements for land and premises. The following policy is strongly recommended to be included in the Core Strategy:- "Green Belt and Open Space designations are not intended to restrict potential plans of organisations such as Thames Water in carrying out their statutory functions."
CORE POLICY 19: GREEN BELT AND COUNTRYSIDE	Preferred Option	James Stevens	Regional Planner (London) Home Builders Federation Ltd	Paragraph 7.2.2 The Council lists those sites located in the Green Belt such as the Lee Valley, Middlesex University's Trent Park campus, Picketts Lock and Crew's Hill as locations where the council will seek to provide or enhance the leisure and employment services on offer. Since the development of such services will require transport infrastructure to support them (as the document acknowledges) we fail to understand why residential development should be excluded from the offer? This seems to be a wasted opportunity when self-contained mixed use developments could be delivered providing a combination of employment, leisure services and housing. Housing located within these developments would provide a locally based labour force and this would cut down on transport emissions since some of those who would otherwise have had to commute to these locations by day can be housed nearby. Furthermore, without housing these would areas would be dead by night. The Barker Review and the TCPA both supported the principle of Green Wedges. Why not grasp the opportunity to experiment here with small eco-town (or if you prefer - village) style developments? Core Policy 19: Green Belt and Countryside At present this does not read like a policy. It reads more like a statement of intent or aspiration and is more akin to a strategic objective. A policy needs to say who will do what, to

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				whom, by when and by what means. The policy states that it will ensure that the detailed boundary is robust and defensible but there is no means of knowing how this will be measured. What criteria will be applied to test this? Also, the policy says that locally specific criteria will be set out to help determine development proposals in the green belt. These will need to be spelt out in the policy. Because there are no clear means of implementation or monitoring we believe this policy would fail the PPS12 tests of soundness vii and viii.
CORE POLICY 19: GREEN BELT AND COUNTRYSIDE	Preferred Option	Mr Chris Baker	Government Office for London	This policy is largely fine, although the key purpose of a core strategy policy on green belt is to set the boundaries. If they are not to be revised, then the policy should say that first. It is important not to reiterate PPG2.
CORE POLICY 19: GREEN BELT AND COUNTRYSIDE	Preferred Option	Ms Karen Foster-	Planning Liaison Officer Environment Agency	[Reword] Core Policy 19: · Work with Lee Valley Regional Park Authority, British Waterways, the Environment Agency, riparian owners and other stakeholders to make the best use of waterway networks in the Upper Lee Valley, including Turkey, Salmons and Pymmes Brook. Reference should be made to the Blue Ribbon Network (as highlighted in the North London Sub Regional Framework Action 4F) which states: "Blue Ribbon Network - Area includes the River Lee corridor, Lee Navigation canal and parts of several tributaries as well as extensive operational reservoirs. Development should enhance, restore and protect river corridors and promote freight and recreational use of the canal. Boroughs, and where appropriate the Mayor and LDA, should work to implement the proposals contained within the North London River Restoration Strategy through a combination of decisions on planning applications and specific projects."
CORE POLICY 19: GREEN BELT AND COUNTRYSIDE	Preferred Option	Mr Dominic Coath	Natural England	Natural England supports the principle of development that creates a sense of place which is in keeping with and can enhance the surrounding countryside.
CORE POLICY 19: GREEN BELT AND COUNTRYSIDE	Preferred Option	Mr Jeff Field	Partner Cluttons LLP	These representations relate to CORE POLICY 19, paragraphs 7.2.3 and 7.2.6 and Illustrative map 3A. Representations were made to the Core Strategy Issues and Options Report by the objector (ref 1337) (ID552). The representation requested the removal from the Green Belt the western part of Arnold House, No.66 The Ridgeway, Enfield EN2 8JA. The site and its context were described at that stage as justifying its release from the green belt. Aerial photographs and a location plan were also produced. The Preferred Options document is both confusing and unsound in relation to the green belt. On the one hand it states: 7.2.4 – rejected the notion of not reviewing the green belt boundary On the other hand, it states: 7.2.3 - that continued protection is the only option based on national and London Plan policy With these statements in mind, it is worth reviewing what the London Plan and the green belt national guidance states: London Plan – Policy 3D.9 Green Belt This states that - The Mayor and the boroughs should maintain the protection of London's green belt and proposals for alterations should be considered through the DPD process in accordance with PPG2. PPG2 This states that - The green belt is a permanent

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				feature and should only be altered in exceptional circumstances. At paragraph 2.7 of PPG2, it points to when boundary changes might be considered – Where existing local plans are being revised and updated, existing Green Belt boundaries should not be changed unless alterations to the structure plan have been approved, or other exceptional circumstances exist, which necessitate such revision. Conclusions The message from both of these documents is that they allow changes to green belt boundaries (whilst acknowledging strong protection) and that the DPD process is the appropriate route. The council acknowledges in its Reasoned Justification that: 'Comments received at the Issues and Options stage supported a review of various parts of the boundary'. Clearly, the representation from Leonard Cheshire was one of these and it pointed to exceptional circumstances with regard to their site. CORE POLICY 19 This is unsound because it does not suggest reviewing the green belt boundary although it does acknowledge the need for it to be robust (how can it be robust without review?). Paragraph 7.2.3 This equally should refer to a review of the green belt as necessary. It also does not set out its response to the need for the review to form part of the Core Strategy preparation – instead, it seems to be responding to those who wanted no change, but then does not show how it will accommodate those who wanted exceptional changes to be considered. Paragraph 7.2.6 This sets out the implementation mechanisms – therefore this must also include a statement that the council will review the green belt boundaries to assess whether they are robust, meet the objectives of PPG2 or whether there are any exceptional circumstances. At Appendix 2 of the Core Strategy and paragraph 2.3, the council acknowledges that 6 representations supported boundary changes, including the proposal for Arnold House. At paragraph 2.4 of the Appendix it states that 'These local representations will be considered in the preparation of the Proposals Map to accompany the production of the final version of the Core Strategy later this year'. This seems to re-iterate the need for the references (desired above) made as part of Policy 19 and paragraphs 7.2.3 and 7.2.6. Finally, Map 2.4 Illustrative Map 3a shows the green belt surrounding Arnold House at The Ridgeway (without the change requested). It should be assumed that the previous and current representations continue to request the boundary change, in the event that this is critical in maintaining the case for the exclusion of the whole of Arnold House from the green belt.
CORE POLICY 19: GREEN BELT AND COUNTRYSIDE	Preferred Option	Mr Patrick Blake	Network Strategy Highways Agency	The HA welcomes proposals to set out assessment criteria in the Development Management Document which would outline criteria for development impacts in the green-belt including the effect of transport movements. It is recommended that this document should specify that all developments likely to have a material impact on the SRN, whether individually or in combination, will be required to produce a Transport Assessment and Travel Plan which should include measures to mitigate transport impacts. This would be in line with Government guidance as set out in OfT Circular 02/2007 and would therefore help to ensure that the document fulfils the requirements of PPS12 (paragraph 4.24) Test of Soundness 4.
CORE POLICY 19: GREEN BELT AND	Preferred Option	Miss Suzy Wilson	CgMs Consulting	The University is looking at rationalising their estate which could result in the closure of the Trent Park and Cat Hill campuses (site plan attached). These campuses have been identified as no longer providing suitably efficient accommodation to meet their needs. The result of any

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COUNTRYSIDE				<p>rationalisation of their estate being to ensure for the future an improved provision of facilities for the University, and higher education in general, within North London. Bringing these sites forward for redevelopment would assist with meeting some of the Core Strategies objectives. The redevelopment of the sites for appropriate uses needs to be recognised within the Local Development Framework. At this stage we request that the sites are taken account of with regard to the Core Strategies objectives with more detailed representations on the type of development suitable for the sites being addressed at the Site Specific DPD stage. The redevelopment of Trent Park could see the demolition of unsightly buildings which currently detract from the objectives of the Green Belt, the conservation area and the setting of the listed buildings. Redevelopment could enable the retention and continued use of the listed buildings, stewardship of the landscape and potentially Increased/improved access to the public. Redevelopment of Cat Hill could also enable the removal of unsightly buildings and enable a more efficient use of a brownfield site. We consider that the Cat Hill site is particularly suited to residential development. Due to its existing scale of development and location, a high density development could be achieved at the site. Redevelopments of both sites would meet the requirements of Core Policy 1 in that they are both previously developed sites which have the potential for more efficient use than at present. In the event that the University pursue rationalisation of their estate in this manner, we consider it would be appropriate for the University to collaborate with the Council to work up development briefs for both sites, similar to that completed for the Ponders End site. In consideration of the above, and the size of these sites and the redevelopment potential they hold, we request that the need for development briefs should be identified and included within the Core Strategy. Core Policy 19 specifically refers to the Trent Park campus, identifying the need to set criteria for assessing future development whilst retaining its Greenbelt status. This would be welcomed in order to recognise the site's potential for redevelopment. Any criteria set to how suitable redevelopment can be achieved at Trent Park needs to be prepared in co-operation with the University to ensure their requirements and intentions are taken account of.</p>
CORE POLICY 19: GREEN BELT AND COUNTRYSIDE	Preferred Option	Mr Stephen Wilkinson	Head of Planning and Regeneration Lee Valley Regional Park Authority	<p>The Authority supports the Core policy 19 which aims to ensure protection and enhancement of the Green Belt. The justification text to Policy 19 should make explicit reference to the fact that a substantial part of the Green Belt in Enfield also forms part of the Regional Park. Core Policy 19 identifies Pickett's Lock as a major developed site and states that the Council will set out criteria for assessing future development in this area whilst retaining its Green Belt status. These criteria will be set out in the Development Management Document. The Authority considers that the regeneration agenda created by the adoption of the ULV vision allows an opportunity to de-designate the built up areas of this site (LVAC, multiplex and car parks). This could support regeneration opportunities in line with the Vision. The Authority wishes to be closely involved in the development of the Enfield Design Guide which will be used to implement the core policies including: 1. landscape assessment of the Green belt and MOL which identifies features at risk and priorities for action, and 2. the development of design advice for new buildings in the Green Belt.</p>

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CORE POLICY 19: GREEN BELT AND COUNTRYSIDE	Preferred Option	Mr Giles Dolphin	Planning Decisions Manager Greater London Authority	Support: This policy is supported.
CORE POLICY 19: GREEN BELT AND COUNTRYSIDE	Preferred Option	David Phillips (GL Hearn)	Planning Director Hadley Homes	<p>7.2: Green Belt and countryside with particular reference to 'Preferred Option Number Green Belt and Countryside' and paras. 7.2.1 to 7.2.9 and the illustrative maps in Appendix 2 referred to under para. 7.2.5 The overall strategic objective of safeguarding the Green Belt is supported. However, given our objections on housing land supply (reference 5.2: Meeting housing requirements with particular reference to paras. 5.2.14 to 5.2.19 of the Core Strategy) and the Council's own acknowledgement in para. 7.2.4, there needs to be a clear commitment in the Core Strategy to reviewing local boundaries to accommodate new housing development. The Core Strategy should therefore state that there will be limited Green Belt releases to accommodate additional housing. The Core Strategy should expressly state that revised local Green Belt boundaries will be defined on the Proposals Map accompanying the Site Allocations DPD. We note that there were a number of representations to the Core Strategy Issues and Options stage, as outlined in paras. 2.2 to 2.4 of Appendix 2 to the Preferred Options Core Strategy. Whilst we agree with the Council that these representations should be considered in the preparation of the Proposals Map this should relate to a separate Site Allocations DPD and not the Core Strategy. The Council should be seeking to inform the Core Strategy by undertaking a Borough wide review of Green Belt boundaries to identify those sites suitable for release as it acknowledges that it is required to do so by virtue of para. 7.2.4. A strategic Landscape and Visual Impact Assessment of potential locations for release should be conducted, encompassing the Guidelines for Landscape and Visual Impact Assessment (GLVIA) published by the Landscape Institute and the Institute of Environmental Management and Assessment 2002, and Landscape Character Assessment (LCA). Guidance for England and Scotland, published by the Countryside Agency and Scottish National Heritage 2002. The strategic review should combine information and desktop reviews with on-site surveys and appraisals. The study should provide an assessment of the principal landscape and visual issues, relating to strategic areas and should be based on a combination of site based assessment and information review. The areas should be assessed in terms of landscape character and sensitivity and visual amenity and sensitivity. Particular attention should be paid to the implications of the Green Belt designation and of the potential effects upon the overriding objectives of this policy designation. Furthermore where limited local scale land release in the Green Belt can be identified, the Council should set out in the Core Strategy and subsequent Site Allocations DPD measures to enhance the surrounding Green Belt and incorporate design features that reinforce and secure defensible Green Belt boundaries that are sustainable into the long term. The provisions for the release of Green Belt land are not expressly stated. This is inconsistent with the need for Green Belt release as identified in para. 7.2.4 of the Core Strategy</p>

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				and our own analysis which demonstrated that the Council has a serious shortfall in housing land supply. In order to make the Core Strategy it is recommended that the following additional paragraphs are added to Core Policy 19:"The Council recognises that there will need to be limited Green Belt releases to accommodate additional housing. Revised local Green Belt boundaries will be defined on the Proposals Map accompanying the Site Allocations DPD. In determining these releases the Council will carry out a Borough wide review of Green Belt boundaries to identify those sites suitable for release. For any released sites the Council will expect measures to enhance the surrounding Green Belt and incorporate design features that reinforce and secure defensible Green Belt boundaries that are sustainable into the long term. "Given the need to review the Green Belt boundaries we would question the appropriateness of enclosing at Appendix 2 the overview maps - namely 2.1, and 2.2 which show existing detailed Green Belt boundaries (1a, 2a, 3a and 4a). These maps add to the confusion on the future of Green Belt boundaries and should be deleted. Finally, it is recognised that the appropriate forum for the identification of sites for development is either through the Proposals Map Site Allocations DPD or relevant Area Action Plan. However it is worth stating at this stage that the allocation of Hadley Homes land interest incorporating Waterworld and Kingswood Nursery and associated land at the junction of Bullsmoor Lane and Great Cambridge Road, Enfield (see attached plan) will facilitate the delivery of housing at a highly sustainable location within the Plan period, thereby assisting in making the objectives of the Plan sound.
Parks, playing fields, other open spaces, green links & waterways	7.3	Mr Peter O'Brien	Partnership Manager Learning Skills Council	Core policy 20: We do not believe that the policy statement pays sufficient regard to the use of parks and playing pitches for formal, organised sporting activities and the employment potential of such use, particularly in the context of the 2012 Games. There is excellent training provision in local colleges and other organisations for qualified sports leader and coaches and there are facilities in schools, colleges, leisure centres and the Lee Valley Athletics Centre to be called on for clubs taking part in organised activities.
Parks, playing fields, other open spaces, green links & waterways	7.3	Ms Anna Chapman	Planner British Waterways-London Region	The significant contribution of the River Lee Navigation currently and its future potential with proposed enhancement to the accessibility of the Lee Navigation and Lee Valley Park to the existing and newly proposed communities in East Enfield should be better reflected in this chapter. As a navigable river the multi-functional nature (navigation, regeneration, recreation, biodiversity, transport etc.) of the River Lee Navigation give sit a unique character to the other natural waterways in the borough and British Waterways therefore believes a separate policy should be drafted to ensure its multi-functional nature is maximised. British Waterways would welcome the opportunity to work with the Council to draft such a policy which would be in conformity with the London Plan Blue Ribbon Network Policies, but be tailored to the specific qualities and pressures faced by the River Lee Navigation.

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Parks, playing fields, other open spaces, green links & waterways	7.3	Mr Mark Matthews	Thames Water Property	Thames Water have a number of essential operational sites in Enfield with Green Belt and with Open Space designations, for example, Chingford South Water Treatment Works, William Girling Reservoir and King George V Reservoir. Our sites may require future development and expansion to meet environmental, social and economic change, as well as standards specifically posed by population and economic growth, tighter environmental standards and from the impacts of climate change. Thames Water's experience at strategic water and sewage treatment sites in the MOL, Green Belt and protected open space, is that there is a lack of recognition of the functions of sewage and water treatment and this often leads to delay in obtaining necessary planning consents for essential operational development. It is essential that there is provision of adequate water and wastewater infrastructure to service existing and new development to avoid unacceptable impacts on the environment. With potential delays to achieving the necessary upgrades to our assets, the ability of our infrastructure to provide water and to treat additional wastewater flows to the required regulatory standards, is undermined. As highlighted in the Planning Inspectorate's published document "Development Plans Examination – A Guide to the Process of Assessing the Soundness of Development Plan Documents", to achieve a 'sound' DPD adequate account should be taken of the relationship between the proposals in the DPD and other requirements, such as those of utility companies and agencies providing services in the area, including their future plans or strategy and any requirements for land and premises. The following policy is strongly recommended to be included in the Core Strategy:- "Green Belt and Open Space designations are not intended to restrict potential plans of organisations such as Thames Water in carrying out their statutory functions."
Parks, playing fields, other open spaces, green links & waterways	7.3	Duncan Bennett (CgMs Consulting)	Senior Associate Director Fairview New Homes Ltd	Fairview New Homes objects to the last sentence within paragraph 7.3.5 which recommends maintaining a strategic reservoir of playing pitches and managing the release of surplus pitches to meet other open space deficiencies. Fairview New Homes considers that it would be unreasonable for the Council to impose such controls on private playing pitches and seeks the revision of this sentence to the following:" It recommends maintaining a strategic reservoir of public playing pitches and managing the release of surplus public pitches to meet other public open space deficiencies".
CORE POLICY 20: PARKS, PLAYING FIELDS AND OTHER OPEN SPACES; GREEN LINKS; AND WATERWAYS	Preferred Option	Mr Andrzej Warhaftig	Business Manager Enterprise Enfield	The alternative use of surplus playing areas, should only be used for leisure, and not for building or development

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CORE POLICY 20: PARKS, PLAYING FIELDS AND OTHER OPEN SPACES; GREEN LINKS; AND WATERWAYS	Preferred Option	James Stevens	Regional Planner (London) Home Builders Federation Ltd	Core Policy 20: Parks, Playing Fields and Other Open spaces; Green Links; and Waterways Parts of this policy read more like a statement of intent or aspiration. The policy needs to say who will do what, to whom, by when and by what means. The Core Strategy needs to set out what is the hierarchy of open spaces that is alluded to. In its current form there is no clear means of implementation or monitoring and it would therefore fail the PPS12 tests of soundness vii and viii.
CORE POLICY 20: PARKS, PLAYING FIELDS AND OTHER OPEN SPACES; GREEN LINKS; AND WATERWAYS	Preferred Option	Ms Karen Foster-	Planning Liaison Officer Environment Agency	[Reword] Core Policy 20 - The Council will continue to protect, enhance and create new networks of open spaces and green links in Enfield. What the bullet points state are very good in board terms. However, there is a significant opportunity for the Council to improve access to parks and open spaces. Moreover, this can create significant benefits to wildlife and consequently result in a massive improvement in the amenity value of the area, i.e. fishing and walking, by restoring the waterways, namely the Pymmes and Turkey Brooks.
CORE POLICY 20: PARKS, PLAYING FIELDS AND OTHER OPEN SPACES; GREEN LINKS; AND WATERWAYS	Preferred Option	Mr Dominic Coath	Natural England	Natural England's recommends the adoption of its Access to Natural Green-space Standards (ANGST). These state that local communities should have access to an appropriate mix of green-spaces providing for a range of recreational needs, of at least 2 hectares of accessible natural green-space per 1,000 population. This can be broken down by the following system: No person should live more than 300 metres from their nearest area of natural green-space; There should be at least one accessible 20 hectare site within 2 kilometres; There should be one accessible 100 hectares site within 5 kilometres; & There should be one accessible 500 hectares site within 10 kilometres.
CORE POLICY 20: PARKS, PLAYING FIELDS AND OTHER OPEN SPACES; GREEN LINKS; AND WATERWAYS	Preferred Option	Ms Sule Nisancioglu	Group Manager, Planning Policy and Transportation London Borough of Haringey	The Council welcomes the inclusion of this policy which seeks, among other things, to address "deficiencies in the quality, range of facilities in, and access to open spaces, particularly in the south and east of the borough". Haringey has a number of areas that are deficient in open space, and some of these deficient areas are those that have a boundary with Enfield in the north and north east of Haringey. Users of open space are not concerned with borough boundaries, but rather with access to good quality open space. This core policy within your preferred options, together with proposed policies in Haringey to tackle the areas of open space deficiency in our borough, will hopefully have a positive effect on the availability of open space in these areas.

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CORE POLICY 20: PARKS, PLAYING FIELDS AND OTHER OPEN SPACES; GREEN LINKS; AND WATERWAYS	Preferred Option	Mr Stephen Wilkinson	Head of Planning and Regeneration Lee Valley Regional Park Authority	The Authority supports the continued protection and enhancement of Enfield's network of open spaces and green links set out in Core Policy 20 Parks Playing Fields and other Open Spaces; Green Links and Waterways,. The hierarchy of public open space is to be considered by the Development Management Document (DMD) to provide priorities for future provision and investment in open space. This will need to take account of the Regional Park and the range of open space opportunities it provides both locally and regionally. There is also a need for the Core Strategy to consider sports and recreation facilities other than pitches and indoor sports centres to reflect the contribution that the Park can make to regional sporting and recreational needs.
CORE POLICY 20: PARKS, PLAYING FIELDS AND OTHER OPEN SPACES; GREEN LINKS; AND WATERWAYS	Preferred Option	Duncan Bennett (CgMs Consulting)	Senior Associate Director Fairview New Homes Ltd	Fairview New Homes objects to Core Policy 20 on two grounds, as follows: - 1. Fairview New Homes objects to the inference in the first bullet point of Core Policy 20 that the Council will consider the designation of private open spaces as Metropolitan Open Land. The criteria should be amended to refer to extending the MOL designation to include green chains and associated public open spaces which meet MOL designation criteria. 2. The last criterion relating to the management of any surplus of playing pitches states that in doing so the Council will first address all types of deficiencies in the existing playing pitch stock and then meeting deficiencies in all other types of open space before considering proposals for alternative uses. Fairview New Homes object to the inference within this policy criterion that it covers both public and private playing pitches and open space. The policy criterion should be revised to clearly state it relates to public playing pitches and public open space. In addition, the criterion does not provide an indication of the range of playing pitch and open space sought. Without this specification there is no means with which to judge whether the criterion has been satisfied. This uncertainty could, in certain circumstances, frustrate the use of surplus playing pitches and open space for alternative uses, contrary to the principles of PPS1 and the efficient use of land.
CORE POLICY 20: PARKS, PLAYING FIELDS AND OTHER OPEN SPACES; GREEN LINKS; AND WATERWAYS	Preferred Option	Mr Giles Dolphin	Planning Decisions Manager Greater London Authority	Support with conditions: This intent of this policy is welcomed and it is supported subject to the comments below being fully taken into account in the submission version. The second bullet point should be amended to make it clear that the Council's hierarchy of open spaces will take the hierarchy of open spaces set out in the Table 3D.1 of the London Plan as its starting point and be included within a DPD as required by London Plan Policy 3D.11. If not included elsewhere within the Core Strategy the policy should be amended to reflect the requirements of London Plan Policy 3D.13 and the Mayor's SPG on providing for children's and young people's play and informal recreation.

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Biodiversity	7.4	Mr Giles Dolphin	Planning Decisions Manager Greater London Authority	Comment: Paragraph 7.4.1 currently reads as if the GLA recommends SSSI designation, which is incorrect (Natural England does). It is suggested that this be re-worded to; "Enfield contains a number of sites identified as being of importance for nature conservation, including SSSIs of national importance. Further sites may be identified in the future; the GLA has undertaken an ecological survey of the borough to provide more up to date evidence and the results are expected early in 2008."
CORE POLICY 21: BIODIVERSITY	Preferred Option	James Stevens	Regional Planner (London) Home Builders Federation Ltd	Core Policy 21: Biodiversity At present this does not read like a policy. It reads more like a statement of intent or aspiration and is akin to a strategic objective. The policy needs to say who will do what, to whom, by when and by what means. For example, it should set out the criteria that will be applied to assess the suitability of development affecting such areas. In its current form there is no clear means of implementation or monitoring and it would therefore fail the PPS12 tests of soundness vii and viii.
CORE POLICY 21: BIODIVERSITY	Preferred Option	Ms Karen Foster-	Planning Liaison Officer Environment Agency	Core Policy 21 - What this policy states is good, however it should also have a second string to it, which should state the following: - The Council should encourage development that aims to restore, improve and create areas rich in biodiversity, as well as undertaking works to achieve this aim itself, in consultation and/or partnership with the Environment Agency, where feasible.
CORE POLICY 21: BIODIVERSITY	Preferred Option	Mr Dominic Coath	Natural England	This policy needs to be strengthened. PPS9 and the London Plan make explicit the need for conservation and enhancement of biodiversity and CP21 must reflect this. Biodiversity needs to be able to expand out from protected sites otherwise it will become increasingly fragmented and eroded by development. The Council needs to enable this through its policy-making so that well sited and thought-out development that enables environmental enhancement is encouraged. This principle is well encapsulated in CP20 and referred to in other parts of the document but it also needs to be an integral part of CP21.
CORE POLICY 21: BIODIVERSITY	Preferred Option	Mr Stephen Wilkinson	Head of Planning and Regeneration Lee Valley Regional Park Authority	Whilst the Authority supports the protection given to sites of importance for nature conservation at all levels in Policy 21 Biodiversity, further consideration should be given to creating new areas of biodiversity value and improving public access to and interaction with nature whilst balancing this against the need to protect sensitive habitats and sites.

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CORE POLICY 21: BIODIVERSITY	Preferred Option	Mr Giles Dolphin	Planning Decisions Manager Greater London Authority	Support with conditions: This intent of this policy is welcomed and it is supported subject to the comments below being fully taken into account in the submission version. Comment: It is suggested that Policy 21 is re-worded to: "The Council will seek to protect sites identified as being of importance for nature conservation at the national, regional and borough levels of significance; and set out criteria for assessing the suitability of development proposals affecting them". Comment: There is no mention here of protection for protected and BAP priority species. Reference should be made to the London Plan Best Practice Guidance on Development Plan Policies for biodiversity (November 2005). This provides details of the policy areas which should be included in core strategies and other DPDs to ensure general conformity with the London Plan. It also suggests other policy areas where biodiversity should be considered, and provides possible wording for policies. There is no mention of existence of/goal to reduce Areas of Deficiency in access to nature. The most recent London Plan requires DPDs to identify areas of deficiency in access to nature and the opportunities for addressing the deficiency. A London Plan Implementation Report on Improving Londoners' access to nature provides information on how this can be done. The report is available at http://www.london.gov.uk/
Strategic townscape & landscape character	7.5	Mr Graham Saunders	Senior Regional Planning Advisor English Heritage - London Region	7.5.3 – It is welcomed that the definition of Heritage Land is provided and that it does not duplicate other designations such as Green Belt, MOL or SINC. But what is the relationship of Heritage Land with Registered Parks and Gardens?
CORE POLICY 22: STRATEGIC TOWNSCAPE AND LANDSCAPE CHARACTER	Preferred Option	James Stevens	Regional Planner (London) Home Builders Federation Ltd	Core Policy 22: Strategic Townscape and Landscape character At present this does not read like a policy. It reads more like a statement of intent or aspiration and is akin to a strategic objective. A policy needs to say who will do what, to whom, by when and by what means. For example, the policy should specify where tall buildings would be supported. In its current form there is no clear means of implementation or monitoring and it would therefore fail the PPS12 tests of soundness vii and viii. The concept of Heritage Land has no statutory basis and should be deleted. This is another example of the growing battery of local protectionist designations designed to obstruct socially necessary development. If Government policy is to contain development within existing urban areas then all should shoulder the burden.

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CORE POLICY 22: STRATEGIC TOWNSCAPE AND LANDSCAPE CHARACTER	Preferred Option	Mr Graham Saunders	Senior Regional Planning Advisor English Heritage - London Region	In general this policy seems sufficiently robust however we would seek to ensure that the evidence base to support the identification of local character and locally important skylines and views is in place. For example, has a characterisation study of the whole Borough been undertaken? If so, reference to this work should be made in the supporting text. In addition which local skyline and views are considered important? What methodology was used to inform this aspect of this core policy? We are assuming that the forthcoming Enfield Design Guide will touch on these issues.
CORE POLICY 22: STRATEGIC TOWNSCAPE AND LANDSCAPE CHARACTER	Preferred Option	Austin Mackie (DTZ Development & Planning)	Director St Modwen	We would question whether this is necessary as a CS policy and might be better reserved for the DC policy stage ?
CORE POLICY 22: STRATEGIC TOWNSCAPE AND LANDSCAPE CHARACTER	Preferred Option	Caroline Dawson (Planning Potential)	Director Kier Property Developments Ltd and the Ponders End Trust	Our clients support the positive attitude towards tall buildings and other landmarks where they respect and compliment local character. Tall buildings can optimise the use of Brownfield sites and also add Identity to an area where it may not have, previously, been distinguished within the wider urban setting.
CORE POLICY 22: STRATEGIC TOWNSCAPE AND LANDSCAPE CHARACTER	Preferred Option	Duncan Bennett (CgMs Consulting)	Senior Associate Director Fairview New Homes Ltd	Fairview New Homes supports the third bullet point within Core Policy 22 which supports proposals for tall buildings and other landmarks where they respect and complement local character. Such an approach is advocated by PPS1 and the London Plan which seeks to promote sustainable development and efficient use of land.
CORE POLICY 22: STRATEGIC TOWNSCAPE AND LANDSCAPE CHARACTER	Preferred Option	Mr Giles Dolphin	Planning Decisions Manager Greater London Authority	Support and comment: This policy should be reviewed against the revised London Plan Policy 4B.1. The Council should consider defining areas within the Borough, such as opportunity areas, where tall buildings may be appropriate as well as defining those areas whose character makes them sensitive to such buildings. Any design criteria for tall buildings should reflect London Plan Policy 4B.10. The proposed Enfield Design Guide is welcomed as a means to develop detailed advice on specific issues such as inclusive access, residential layout, waterside design or car parking. This should clearly and directly supplement policies within the DPDs and have regard to all relevant strategic policy guidance in the London Plan, SPG's such as the Mayor's Sustainable Design and Construction SPG and best practice guidance documents.

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Built heritage	7.6	Dr Chris Jephcott	President The Enfield Society	In 7.6.2 'What you told us' is the statement - There is no support for the designation of Areas of Distinctive Quality In fact, of the 6 responses to Question 45 in the Core Issues and Options Report, only one from Dennis Stacey was an objection. The NFU advocated further consultation and the Enfield Society, the Enfield Lock Conservation Group, the Forty Hill and Bulls Cross Study Group and English Heritage London Region were in favour
Built heritage	7.6	Mr Chris Baker	Government Office for London	This policy is partly satisfactory, but there is considerable repetition of PPGs 15/16, which is not needed.
Built heritage	7.6	Mr Graham Saunders	Senior Regional Planning Advisor English Heritage - London Region	As the Government's adviser on the historic environment English Heritage is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the local planning process. English Heritage welcomes the opportunity to comment upon this key planning document. Overall it is essential that all heritage assets, their setting and the wider historic environment are identified and valued when developing the Core Strategy and its associated Sustainability Appraisal. This Strategy and its Appraisal must demonstrate clearly and robustly that these matters have been sufficiently covered and given due care and consideration. With this in mind please find attached details of our comments on the identified issues and options and Sustainability Appraisal. Finally, English Heritage would strongly advise that the Borough's own conservation staff are closely involved throughout the preparation and implementation of the Core Strategy and associated Sustainability Appraisal, as they are often best placed to advise on: local historic environment issues and priorities, sources of data; and consideration of options relating to the historic environment. This opinion is based on the information provided by you and for the avoidance of doubt does not reflect our obligation to advise you on, and potentially object to any specific development proposal which may subsequently arise from this or later versions of the plan which is the subject to consultation, and which may, have adverse effects on the historic environment.
Built heritage	7.6	Mr Graham Saunders	Senior Regional Planning Advisor English Heritage - London Region	7.6.1 – English Heritage maintains the Register of Parks and Gardens of Special Historic Interest in England. This can be short-handed to the Register of Historic Parks and Gardens as indicated in the text. In addition it would useful to include the total number of statutorily listed and locally listed buildings within the Borough.
CORE POLICY 23: BUILT HERITAGE	Preferred Option	Mr Matthew Roe (CgMs)	Senior Associate Director Metropolitan Police	Policy 23 seeks to safeguard and enhance the borough's built heritage, the MPA would suggest the following point is added to the policy with wording 'ensure that alternative uses are considered for redundant heritage buildings in the Borough' to allow the borough's built heritage to be preserved or enhanced.

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CORE POLICY 23: BUILT HERITAGE	Preferred Option	Mr Graham Saunders	Senior Regional Planning Advisor English Heritage - London Region	Bullet point 1 – the wording should be amended to ‘ensure that the character and appearance of the borough’s conservation areas and their settings are preserved and enhanced.....’ Bullet point 3 – the wording should be amended to ‘preserve and enhance the special interest of statutory listed buildings and their settings.’ Bullet point 7 – the wording should be amended to ‘identify historic parks and gardens of national and local interest; ensure that proposals for developments within or affecting them do not adversely affect their character and setting; and’
CORE POLICY 23: BUILT HERITAGE	Preferred Option	Miss Suzy Wilson	CgMs Consulting	The proposals for the redevelopment of these sites would also comply with Core Policy 23 which deals with the built heritage. The removal of a number of the buildings at Trent Park and their replacement with more suitable development would preserve and enhance the conservation area and setting of the listed buildings. In addition this would ensure the continued stewardship of both.
CORE POLICY 23: BUILT HERITAGE	Preferred Option	Mr Giles Dolphin	Planning Decisions Manager Greater London Authority	Support: This policy is supported.
Retailing, Leisure & Culture: the core policies	8	Mr Derek Searle		Regarding retailing, leisure and culture, you need to give people far more information about changes. For instance as a library user there was very little information about the move of Central Library to Thomas Hardy House and I had to write to the Head of Library Services & involve my Councillor Chris Bond before I really found out about what was going on.
Retailing, Leisure & Culture: the core policies	8	Kate Tinsley (Peacock and Smith)	WM. Morrison Supermarkets PLC	Chapter 8 highlights the Boroughs main town/district centres. Whilst it is recognised that a new proposals map will be produced as part of the emerging LDF at a later date, our client would request that the Council clearly identify/allocate (and show on the new proposals map) the existing Morrisons stores as follows: 1. Southbury Road, Enfield, EN1 1TW - within a designated retail park and identified as a suitable destination for additional retail floorspace, should the need be identified and if there were no other sequentially preferable sites available. 2. Aldermans Hill, Palmers Green, N13 4YD - Palmers Green centre boundary be extended to include the Morrisons store.

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Retailing, Leisure & Culture: the core policies	8	Caroline Dawson (Planning Potential)	Director Kier Property Developments Ltd and the Ponders End Trust	Whilst this section of the Core Strategy includes retail policies for town centres and retail parks it makes no reference to the importance of providing localised retail facilities for day to day needs. Whilst the siting of such facilities may be best dealt with in Area Action Plans, it should be an overarching feature of the Core Strategy that it recognises the importance and acceptance of suitably scaled local shopping facilities in order to help to build local communities and achieve sustainable development. It is, therefore, suggested that a specific policy to this end be introduced.
Introduction	8.1	Sainsbury's Supermarkets Limited	c/o Agent for Sainsbury's Supermarkets Limited	Paragraph 8.1.1 indicates that there is limited potential demand for convenience goods floorspace within the Borough up to 2013, and no need for new food stores for the foreseeable future. PPS6 does not required proposals for retail development in town centres to demonstrate need. There should therefore be an acknowledgement that increased convenience floorspace within existing town centres will be encouraged to support their vitality and viability.
Introduction	8.1	Mr Giles Dolphin	Planning Decisions Manager Greater London Authority	Support: These objectives are supported.
Town centres & new development	8.2	Mr Peter O'Brien	Partnership Manager Learning Skills Council	Core Policy 24: In developing Town Centres, consideration could be given to incorporating shared training facilities, particularly for small and independent traders, into the design - this is consistent with Core Policy 35. There are many organisations that could provide accredited training to retailers if facilities were available.
Town centres & new development	8.2	Sainsbury's Supermarkets Limited	c/o Agent for Sainsbury's Supermarkets Limited	Winchmore Hill is currently identified as a local centre. The centre comprises a number of multiple retailers, together with banks, a post office, restaurants, cafes, travel agents and hairdressers. In addition to this, the Sainsbury's store provides the main supermarket anchor for this centre. Taking this into account, when referring to the hierarchy of centres as defined in PPS6 (Annex A), it is considered that Winchmore Hill has the characteristics of a District Centre and should be allocated as such in the Core Strategy and Proposals Map.
Town centres & new development	8.2	Sainsbury's Supermarkets Limited	c/o Agent for Sainsbury's Supermarkets Limited	Highlands Village and the Sainsbury's store located there provides an important retail function for the surrounding residential area with the Sainsbury's store providing for weekly and top-up convenience shopping. The important retail function of the store, together with the other shops and services available within this centre, which includes a Post Office and a Health Centre, are consistent with the characteristics of a District Centre as identified in PPS6 (Annex A), and the centre should thus be identified as such in the Core Strategy.

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Town centres & new development	8.2	mr gary thomas	Lionsgate Properties (Planning Works Ltd.)	8.2.6 Dealing with the complexities of the north London office sector in summary form is difficult. However, the comments in the paragraph related to the 2007 LOPR and office supply and demand issues fail to take into account a number of significant factors. Issues such as existing vacant stock and new stock below that report's monitoring threshold for information gathering need to be balanced against the comments made on lack of supply.
Town centres & new development	8.2	Mr Chris Baker	Government Office for London	The content of this policy is appropriate, but it would benefit from some redrafting, notably to moving the material on the roles of the centres to the beginning of the policy to emphasise the hierarchy locally.
Town centres & new development	8.2	Mr Giles Dolphin	Planning Decisions Manager Greater London Authority	Comment: Paragraph 8.2.8. The town centre hierarchy should be included with a DPD not an SPD.
CORE POLICY 24: TOWN CENTRES	Preferred Option	Mr Andrzej Warhaftig	Business Manager Enterprise Enfield	
CORE POLICY 24: TOWN CENTRES	Preferred Option	mr gary thomas	Lionsgate Properties (Planning Works Ltd.)	The policy fails to recognise the role of new residential development in town centres in strengthening and regenerating those areas. Such uses should be specifically mentioned. This is partially recognised in Core Policy 10 and this policy should be amended to reflect this.
CORE POLICY 24: TOWN CENTRES	Preferred Option	mr gary thomas	Lionsgate Properties (Planning Works Ltd.)	The desire to protect existing offices should be balanced not only against the "need" for such accommodation but also against the benefits to the town centre of what is to be provided in their place.
CORE POLICY 24: TOWN CENTRES	Preferred Option	Mr Matthew Roe (CgMs)	Senior Associate Director Metropolitan Police Authority	As mentioned above, the London Plan now provides a strategic planning policy basis for assisting the delivery of MPA's estate strategy requirements and ensures that policing becomes a material consideration when determining planning applications and formulating planning policy. Mindful of this, it is considered that emerging Development Plan Documents support the MPA's key objective to introduce police 'shops' into locations with good accessibility. The purpose of police 'shops' are to provide direct public interface facilities with the police. The Borough's town centres are ideally located to accommodate these facilities. These police 'shops' will provide a police presence in retail centres and operate in similar way to traditional Use Class A1 units, thus contributing positively to the health of these retail centres. The introduction of police 'shops'

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				in main shopping frontage of town centres will help deliver one of the strategic objectives of the Core Strategy to reduce crime and fear of crime within the Borough. Accordingly the forthcoming Development Management Document referred to in Policy 24 should ensure that the range of facilities and services to be encouraged in District and Local Centres support the MPA's requirement in this regard. The MPA are also introducing Safer Neighbourhood Teams into every ward across the Borough. These teams require office accommodation from which police officers can patrol local areas on bike or foot. Such office accommodation could be sited in local shopping centres and parades either in isolation or with police 'shops'. Therefore, within the emerging DPD it is recommended that an element of flexibility is incorporated, ensuring that offices are considered appropriate alternative uses in District and Local Centres. Therefore the MPA recommend the town centre policy makes reference to 'police facilities' as permitted non retail uses in Borough's town centres and local centres; also with specific reference in the Development Management Document.
CORE POLICY 24: TOWN CENTRES	Preferred Option	Mr Graham Saunders	Senior Regional Planning Advisor English Heritage - London Region	The policy does not sufficient reference to the historic environment and its contribution in helping to define the existing and future character of a town centre. Bullet point 6 should be amended to reflect this important issue as part of improving the quality of the town centre environments.
CORE POLICY 24: TOWN CENTRES	Preferred Option	Ms Jill McGregor (GL Hearn)	Tesco Stores Ltd	Tesco supports the Council's strategic policy objectives for strengthening and regenerating the role of Enfield's town centres by focusing projected demand for further retail floorspace within Enfield Town and the designated District, Local Centres and existing retail parks. Further retail development should also be promoted within the Area Action Plan DPD's as this will facilitate sustainable mixed-use development within these regeneration areas as well as providing continued long-term local employment opportunities.
CORE POLICY 24: TOWN CENTRES	Preferred Option	Austin Mackie (DTZ Development & Planning)	Director St Modwen	The broad framework is supported. In encouraging major development to Enfield, this should not undermine the ability of other district centres to accommodate future growth / qualitative enhancement of a scale appropriate to their current or future potential catchment / role. In respect of any future development policies in relation to the mix of permitted class-A retail and other uses, policy should be evolved through close consultation with key stakeholders, which in relation to Edmonton Green is St Modwen.
CORE POLICY 24: TOWN CENTRES	Preferred Option	Duncan Bennett (CgMs Consulting)	Senior Associate Director Fairview New Homes Ltd	Core Policy 24 seeks to strengthen and regenerate the role of Enfield's town centres in a number of ways including seeking to focus new commercial retail, leisure, office and other related uses within the Borough's hierarchy of major, district and local centres, using the sequential test to direct development to appropriate sites. Fairview New Homes objects to the exclusion of residential uses from this policy. The inclusion of residential development within town centres are seen as an important element in promoting the vitality and viability of town centres and especially its night time economy/evening economy. Fairview New Homes therefore

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				seeks the inclusion of residential within the first bullet point of Core Policy 24.
CORE POLICY 24: TOWN CENTRES	Preferred Option	Mr Patrick Blake	Network Strategy Highways Agency	It is noted that Core Policy 24 states that the Council will "resist the loss of existing office uses in Enfield and Southgate town centres unless it can be demonstrated they are no longer required or will be re-provided elsewhere". PPG13 states that it is important that office development is located in town centres and close to public transport hubs in order to minimise need to travel and to maximise travel by sustainable modes. To this end, it is recommended that Core Policy 24 is updated to state that the Council will "resist the loss of existing office uses in Enfield and Southgate town centres unless it can be ... re-provided in alternative town centres with good access to public transport". This would help to ensure that the Plan is in line with PPS12 (paragraph 4.24 Test of Soundness 4).
CORE POLICY 24: TOWN CENTRES	Preferred Option	Mr Giles Dolphin	Planning Decisions Manager Greater London Authority	Support: This policy is supported.
CORE POLICY 24: TOWN CENTRES	Preferred Option	Philip Murphy	Associate RPS	In accordance with PPS6, Core Policy 24 seeks to target retail development within the Borough's hierarchy of centres. However, it is noteworthy that paragraph 8.2.4 refers to the conclusions of the Enfield Retail and Town Centre Study which suggests that after allowing for growth within the Borough's town centres, demand for 14,000sq.m comparison goods retail floor-space still remains unallocated. Given that the identified demand for retail provision cannot be satisfied in or on the edge of the Borough's town centres, it is appropriate for the Council to consider suitable alternative locations, which should be well served by public transport, as advocated in PPS6. In view of the scale of growth anticipated at Central Leaside and the need for supporting public transport improvements, it would be reasonable for the Council to identify the potential for retail development to form part of the new mixed-use community at Central Leaside. It is therefore suggested that an additional bullet be added to Core Policy 24 as follows: "retail development will be acceptable at Central Leaside as part of the transformation of the area into a series of vibrant and sustainable communities. Such development will need to satisfy the tests of PPS6 including enhanced public transport accessibility."

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CORE POLICY 25: RETAIL PARKS	Preferred Option	Ms Sule Nisancioglu	Group Manager, Planning Policy and Transportation London Borough of Haringey	Haringey would wish to see Enfield's intensification of existing retail concentrated on their existing hierarchy of major, district and local centres using the sequential test to direct development o appropriate sites. The Central Leaside Area Action Plan will largely address any potential retail increase around Glover Drive. However, we would like to emphasise the importance of assessing rigorously the potential impact of possible further extensions to retail development in the Glover Drive area on local shopping centres, and avoiding actions which will have negative impact on the vitality and viability of Tottenham High Road as a retail centre for Haringey.
CORE POLICY 25: RETAIL PARKS	Preferred Option	Ms Jill McGregor (GL Hearn)	Tesco Stores Ltd	Tesco supports the intensification of existing retail and leisure uses within existing retail parks where such proposals increase the overall sustainability and accessibility of these sites. However Tesco consider that a more explicit definition of the sustainability criteria that the Council will utilise in assessing relevant proposals/or cross reference to Core Policy 1: Sustainable and efficient land use; Core Policy 2: Sustainable design and construction should be made within Core Policy 25.
CORE POLICY 25: RETAIL PARKS	Preferred Option	Mr Giles Dolphin	Planning Decisions Manager Greater London Authority	Objection: This policy is not in general conformity with London Plan policies 3D.2 and 2A.8. London Plan Policy 3D.2 requires that DPD policies should treat proposals for out of centre development or for intensification or expansion of existing out of centre retail facilities in line with Policy 2A.8. London Plan Policy 2A.8 requires that Boroughs use the network of town centres shown on Map 3D.1 as the basis for policy development and delivery within them. Specifically it states that DPD policies should identify future levels of retail and other needs in light of integrated local and strategic assessments and enable the supply of capacity to meet these and develop and enhance the network of centres shown on Map 3D.1. The wording of the policy should make it clear that proposals for out of centre development or for intensification or expansion of existing out of centre retail facilities will only be considered where they cannot be accommodated within or on the edge of established town centres both within and outside the Borough and include measures to increase the overall sustainability and accessibility of the retail park in question. The supporting text for both London Plan policies 3D.2 and 2A.8 provides further guidance on this issue.
Leisure, culture and tourism	8.3	Mr Peter O'Brien	Partnership Manager Learning Skills Council	Core Policy 26: It is unclear from the policy statement whether sufficient regard has been paid to the distribution of and accessibility to leisure and cultural facilities, or how engaging these facilities are to different communities and age groups. There is good provision of education and skills courses that, with more local outlets, could be expanded. Core Policy 27: The policy on infrastructure could be expanded to make it clear that this includes brokering deals between hotels and visitor attractions with colleges and other providers so that local people acquire the skills needed to secure sustainable local jobs. It may also be pertinent here to consider more imaginatively the approach to Building Schools for the Future. Dedicated conference facilities could become part of all-age learning facilities and be used by private sector companies.

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Leisure, culture and tourism	8.3	Mr Raymond Deakin	Minister Jehovah's Witness	Summary: 1) Request that consideration is given to allocating land for community use and places of worship. 2) Requests that the Council resist any application for a change of use from D1, particularly D1(h), to any other use, or from D1(h) to any other D1 use. This is due to the scarcity of available D1(h) sites. 3) There are very few sites currently designated for D1 (h) use. Are there specific areas where a change of use to D1 (h) use might be considered? 4) What plans do the Council have for reserving sites for D1 (h) use in new development areas, and for providing a list of such sites periodically made available to D1 (h) users who have registered an interest?
CORE POLICY 26: LEISURE AND CULTURE	Preferred Option	Ms Anna Chapman	Planner British Waterways-London Region	The fourth bullet point in this policy should be re-worded to include a reference to British Waterways given the importance of the River Lee Navigation to leisure and culture in the borough and the fact that British Waterways is the owner and navigation authority of the River Lee Navigation. British Waterways also has an interest in a number of sites currently used for or with the potential to be used for leisure purposes, in addition to having an interest in a number of leisure operators in the borough. Furthermore British Waterways is a statutory consultee for development with a potential to affect the River Lee Navigation.
CORE POLICY 26: LEISURE AND CULTURE	Preferred Option	Mr Andrzej Warhaftig	Business Manager Enterprise Enfield	The objectives are supported, and whilst the 1% levy for the arts is admirable - we would have thought that there are other equally deserving causes, within social enterprises, and even start up business support for example.
CORE POLICY 26: LEISURE AND CULTURE	Preferred Option	Mr Mark Hayes	The Chair Enfield Housing Association Forum	CORE POLICY 26 This should be strengthened by recognising the role that educational buildings and facilities, and faith-based buildings, can play in providing leisure and cultural opportunities
CORE POLICY 26: LEISURE AND CULTURE	Preferred Option	Rose Freeman	Planning Assistant The Theatres Trust	We welcome this policy that will protect Enfield's existing leisure and cultural facilities and encourage new developments. The Core Strategy gives us the opportunity to recognise clearly the increasing value of culture to individuals as well as to the development of strong communities. We know the difference a theatre experience makes to our lives and the protection of theatres is essential if future generations are to have the opportunity to experience the joys of drama, dance, music and opera. Facilities for major leisure and entertainment use should be concentrated in the town centre so that a balanced leisure scene will entertain and stimulate visitors, residents and local businesses with visiting audiences enlivening the surrounding area in the evening, and providing regular custom for local bars and restaurants outside normal working and shopping hours.
CORE POLICY 26: LEISURE AND CULTURE	Preferred Option	Mr Matthew Roe (CgMs)	Senior Associate Director Metropolitan	Policy 26 seeks to protect, promote and encourage the use of leisure and cultural facilities in the Borough. The MPA welcome the recognition of 'policing' issues in supporting development proposals relating to the evening and night-time economy in town centres.

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			Police Authority	
CORE POLICY 26: LEISURE AND CULTURE	Preferred Option	Austin Mackie (DTZ Development & Planning)	Director St Modwen	The 1% for public art must be considered carefully, as this could become a large and onerous contribution on some financially sensitive schemes. All proposals should be considered on their merits subject to individual scheme merits and wider contributions. We would recommend that the fixed percentage is removed allowing for site specific consideration.
CORE POLICY 26: LEISURE AND CULTURE	Preferred Option	Mr Stephen Wilkinson	Head of Planning and Regeneration Lee Valley Regional Park Authority	The Authority seeks an amendment to Core Policy 26 Leisure and Culture to make specific reference to the Lee Valley Regional Park's Proposals in accordance with the provisions of the Park Act Section 14 (2). It is also unclear whether this part of the policy is meant to be specific to the Regional Park and the words "in the regional park" need to be added to the end of the sentence. It should be amended as follows: "The Council will seek to protect, promote and encourage the use of leisure and cultural facilities in the borough by....."supporting the Lee Valley Regional Park Authority Proposals and other partners in their efforts to increase the range, quality and access to leisure and amenity provision within the Lee Valley Regional Park available to Enfield residents". Supporting text should also refer to the strategic importance of Pickett's Lock as a key leisure, sporting and entertainment node and the potential this offers for further development.
CORE POLICY 26: LEISURE AND CULTURE	Preferred Option	Duncan Bennett (CgMs Consulting)	Senior Associate Director Fairview New Homes Ltd	Fairview New Homes objects to the inclusion of the last bullet point within Core policy 26 requiring a 1% contribution of the total cost of major mixed-use developments towards a wide range of local arts projects. Fairview New Homes considers that this absolute requirement is too onerous and does not take into account project viability. Whilst local arts projects are an important local function, the relevance and reasonableness of contributions towards them should be judged on a site by site basis having regard to other factors such as site decontamination costs, renewable energy requirements, affordable housing provision etc. Contributions towards local art projects should be reviewed in the same manner as all other planning gain and should not therefore be expressed as an absolute policy requirement. Fairview New Homes therefore seeks the deletion of the last bullet point within core policy 26.
CORE POLICY 26: LEISURE AND CULTURE	Preferred Option	Mr Giles Dolphin	Planning Decisions Manager Greater London Authority	Support with conditions: This intent of this policy is welcomed and it is supported subject to the comments below being fully taken into account in the submission version. The policy should be reviewed against revised London Plan policies 3D.4 and 3D.5 and revised as necessary to ensure that the submission version of the Core Strategy is in general conformity.

Document Section	Section Number or Question	Name	Organisation	Response
CORE POLICY 27: VISITORS AND TOURISM	Preferred Option	Ms Anna Chapman	Planner British Waterways-London Region	British Waterways believes there is an opportunity to create a visitor destination on the waterside at Ponders End to include food and drink and visitor accommodation. This would enable visitors better access to the River Lee Navigation and the Lee Valley Park thus enhancing Enfield's tourism offer. British Waterways would therefore like to see this policy re-worded to support proposals for visitor accommodation at Ponders End.
CORE POLICY 27: VISITORS AND TOURISM	Preferred Option	Mr Andrzej Warhaftig	Business Manager Enterprise Enfield	To attract visitors there needs to be a more balanced offer of art, leisure and cultural activities available, day and night.
CORE POLICY 27: VISITORS AND TOURISM	Preferred Option	Caroline Dawson (Planning Potential)	Director Kier Property Developments Ltd and the Ponders End Trust	Core Policy 27 deals with "visitors and tourism" and adopts a supportive approach to new hotels but recommends that they be located in the town centres. The Core Strategy is probably interpreting hotel accommodation in an unreasonably restrictive manner if it assumes that it is solely focused on tourism. Many hotels are in existence to serve the business community in association with local commercial activities and localities. Consequently, those visiting the Borough on business and wishing to be close to clients and suppliers would prefer hotel accommodation to be located at sites other than the town centres, such as in the proximity of commercial activities and employment areas. In this way, a sustainable location for this type of hotel accommodation can be achieved by placing customers in close proximity to the reason they are visiting the Borough. This does not mean, of course, that all hotels should be located outside of town centres but the Core Strategy should fully recognise that hotels have a wide range of functions and, consequently, that they need bespoke locations in order to meet these. Consequently, our clients suggest that Core Policy 17 be supplemented by reference to the fact that hotels serving the business community can also be found acceptable at locations with good accessibility to commercial areas throughout the Borough.
CORE POLICY 27: VISITORS AND TOURISM	Preferred Option	Mr Giles Dolphin	Planning Decisions Manager Greater London Authority	Support with conditions: This intent of this policy is welcomed and it is supported subject to the comments below being fully taken into account in the submission version. The policy should be reviewed against revised London Plan Policy 3D.7 and amended as necessary to ensure that the submission version of the Core Strategy is in general conformity. In particular a bullet point should be added stating that the Council will support an increase in the quality and quantity of fully wheelchair accessible accommodation in light of integrated strategic and local assessments.
Travel and Movement: the core policies	9	Mr Derek Searle		Regarding travel and movement you should not allow boot sales to go any where near main roads. For example Kingsmead School, which is run by the Council has a boot sale every Saturday. Southbury Road is one of the busiest in Enfield and traffic to & from the boot sale just adds to the congestion.

Document Section	Section Number or Question	Name	Organisation	Response
Travel and Movement: the core policies	9	Mr Giles Dolphin	Planning Decisions Manager Greater London Authority	The approach to walking and cycling and to pooling contributions, travel demand management and use of transport statements and travel plans is welcomed. However, the reference to providing maximum parking standards is strongly objected to and would be a matter of general conformity if carried through to the Submission document. Similarly the references to promoting highway improvements are also objected to – particularly reference to the northern gateway access road and additional access on the M25, highway improvements should be to improve accessibility primarily by public transport, walking and cycling rather than increase highway capacity.
Introduction	9.1	Mr Giles Dolphin	Planning Decisions Manager Greater London Authority	Support: This objective is supported. Comment: the supporting text is wrong in stating 'Traffic growth is rising by 1.6% per annum', it is about one third of this level. This error could be amended by considering wording that accurately reflects the Council's statutory local transport plan (LIP) – for example: 'Traffic growth in Outer London as a whole is barely rising at all and is falling in some boroughs. The highway data for Enfield is not sufficiently consistent as yet to establish the local contribution to this trend, the Council has set an upper limit for traffic growth of 6% between 2001-2010/11 in its Local Implementation Plan agreed with the Mayor of London, which equates to the Council assuming a maximum growth rate for traffic of c..0.5% per annum.' Comment: Chapter 9 'Travel and Movement' refers to improving orbital links in the Borough. The emphasis should be on improving bus links and not private transport and road schemes. The reference to growth being phased until transport needs can be met is supported. Opportunities for public transport improvements should be considered and included in development proposals, demonstrated in transport assessment and also included in section 106 agreements.
Integrating spatial planning and transport	9.2	Ms Sule Nisancioglu	Group Manager, Planning Policy and Transportation London Borough of Haringey	Para 9.2.16 - The report makes reference to the Development Management Document setting out standards for the provision of car parking space. It is impossible to comment on this in the Preferred Options report without seeing what is proposed.
Integrating spatial planning and transport	9.2	Mr Giles Dolphin	Planning Decisions Manager Greater London Authority	Comment: Paragraph 9.2.4. The references in bullet points 3 and 4 to pooling of contributions, travel demand management, transport statements and travel plans are supported by Transport for London. Comment: Paragraph 9.2.10. Car parking standards should be applied in accordance with Annex 4 of the London Plan which sets out the maximum permissible level of car parking, in many cases provision well below these standards is considered appropriate.

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CORE POLICY 28: LOCATION AND PHASING OF NEW DEVELOPMENT	Preferred Option	Mr Andrzej Warhaftig	Business Manager Enterprise Enfield	We support Core Policy 28
CORE POLICY 28: LOCATION AND PHASING OF NEW DEVELOPMENT	Preferred Option	Mr Mark Hayes	The Chair Enfield Housing Association Forum	CORE POLICY 29 This policy needs to be strengthened with a pro-active commitment to the development of safe routes and facilities for cyclists and pedestrians
CORE POLICY 28: LOCATION AND PHASING OF NEW DEVELOPMENT	Preferred Option	Mr Mark Hayes	The Chair Enfield Housing Association Forum	CORE POLICY 28 The Lee Valley railway line is critical to the achievement of this policy. The provision of appropriate local services, together with improved access across the railway line, should be recognised
CORE POLICY 28: LOCATION AND PHASING OF NEW DEVELOPMENT	Preferred Option	Ms Vilna Walsh (First Plan)	Director National Grid Property Holdings	There is no objection in principle to the presumption in the Preferred Option that major new developments, particularly in the Upper Lee Valley, should be phased in line with the provision, within the locality, of new social and physical infrastructure, improvements to public transport and complementary employment. However, the policy must allow for flexibility for sites which may not fall into any subsequently defined phasing plan but which bring with them key regeneration and other benefits. For example, important new residential development such as that being considered by National Grid at sites at Willoughby Lane and Ponders End, and which are currently under pre-application discussion with the LPA and GLA, have a very specific time frame in which they can be brought forward for development. This is primarily associated with the removal of the gas holders and operational considerations. Sites such as these which can both pump prime and deliver wider regeneration benefits should not be prevented from coming forward by an inflexible or overly prescriptive approach to phasing. Furthermore, the benefits of certain sites coming forward sooner rather than later, or indeed not at all, should be a material consideration. The redevelopment of the National Grid sites in particular are considered to be integral to the regeneration objectives and "step-change" envisaged by the LPA for the Upper Lee Valley area and should be actively encouraged notwithstanding any phasing of development objectives. The following wording, shown in bold and underlined, should be added to the final paragraph of Core Policy 28. Major new developments, particularly in the Upper Lee Valley, should be phased in line with the provision, within the locality, of new social and physical infrastructure, improvements to public transport and complementary employment. It may be appropriate in certain circumstances and, in particular, where wider regeneration benefits can be achieved to allow certain sites to be brought forward ahead of phased provision of infrastructure

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				improvements or other complementary facilities. The Council will take into account site specific considerations in applying the phasing requirement in determining applications and/or through the allocation of sites in Development Plan Documents. In such circumstances the Council will require that development proposals demonstrate that improvements to public transport and accessibility have been provided where possible to mitigate impact on the transport network.
CORE POLICY 28: LOCATION AND PHASING OF NEW DEVELOPMENT	Preferred Option	Steven Mills	Senior Town Planner Network Rail	Considering the references to pooling of contributions in Section 9.2.2 and 9.2.4 Core Policy 28 should be amended to identify this as a mechanism of funding supporting infrastructure investment, such as public transport, that would then allow greater levels of development to take place. This would be more positive and pro-active, by using S106's to help to invest in increased transport capacity, rather than simply using them to mitigate the impact of development so that change in capacity after development is neutral. This approach is supported in Circular 05/05 at paras B21-24.
CORE POLICY 28: LOCATION AND PHASING OF NEW DEVELOPMENT	Preferred Option	Duncan Bennett (CgMs Consulting)	Senior Associate Director Fairview New Homes Ltd	Fairview New Homes supports the provisions of core policy 28 and specifically the policies provision to ensure that large trip generating developments are located in town centres.
CORE POLICY 28: LOCATION AND PHASING OF NEW DEVELOPMENT	Preferred Option	Mr Patrick Blake	Network Strategy Highways Agency	The HA welcomes proposals to locate large trip generating development in the Borough's town centres and to phase development in line with the provision of public transport infrastructure, as set out in Core Policy 28. However the HA is concerned that the Council has not yet assessed the potential impacts of development on the SRN but has identified a list of improvements to public transport that will be required in order to mitigate these impacts. In our representations regarding the Core Strategy and Enfield Town AAP Issues and Options Reports, it was recommended that each Plan should be accompanied by an Evaluation of the likely Transport Impacts of the Plan. The HA reiterates the importance of this evaluation, which should take into account all sites likely to have an impact on the SRN (either individually or in combination with other sites). Such an assessment should help the borough to devise appropriate mitigation measures to reduce the impact of the plan on the SRN. It is crucial for the HA to understand the likely impact that the quantum of development in Enfield will have on the SRN and to confirm that there is a realistic expectation that the impact of development can be mitigated. In particular it is recommended that an evaluation should take into account the potential impacts of increased flows, especially of HGVs, on junctions 25 and 26 of the M25 (see paragraph 7 above). It is noted that paragraph 9.3.18 of the Preferred Options Report states that "The Council considers that four tracking of the West Anglian route is essential to fully deliver improvements to accessibility in the Upper Lee Valley and will seek to secure implementation at the earliest possible stage". It may therefore be appropriate to identify, through the evaluation of transport

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				<p>impacts, the level of development that can be accommodated with and without delivery of the four tracking scheme. Evaluations of Transport Impact could be brought forward in relation to Site Specific Allocations associated with the Core Strategy, or they could form part of the evidence base for the AAPs which form part of the LDF. The level of detail required for each evaluation should be consistent with the likely impact. North East Enfield AAP should therefore require a reasonably detailed assessment, whereas a simple analysis of existing and likely future journey patterns and mode splits may suffice for development in Enfield town centre and Central Leaside. In all cases it is strongly recommended that the evaluation is completed by the Preferred Options stage in order to inform the selection of Preferred Options for the Plan. We have attached a note on Evaluating Transport Impacts which provides guidance on the likely level of assessment required in order to provide a credible evidence base for the Plan. Given the increased emphasis on evidence based plans in PPS12, it is considered that a Plan without an evidence base would fail PPS12 (paragraph 4.24) Test of Soundness 7. Development of a credible evidence base would also allow the HA and the Council to work together to deliver appropriate and sustainable transport improvements. Furthermore, in order to facilitate the phasing of development it is recommended that clear guidance is given to developers regarding the likely timescales for the delivery of infrastructure improvements. This would be in line with the recommendations in the recent Planning Inspectorate guidance document 'Lessons Learnt Examining Development Plan Documents' (PINS, 2007). This is considered particularly important for North East Enfield and Central Leaside, where significant levels of development and transport improvements will take place. This will ensure that the Plan is in line with PPS12 (paragraph 4.24) Test of Soundness 8.</p>
CORE POLICY 28: LOCATION AND PHASING OF NEW DEVELOPMENT	Preferred Option	Mr Giles Dolphin	Planning Decisions Manager Greater London Authority	<p>Support and comment: The aim of the policy to focus large trip generating development in town centres, and of other intensive forms of development in other areas that are highly accessible by public transport, walking and cycling is welcomed. Consideration should be given to stressing the importance of information, behavioural/lifestyle or travel demand management measures, as well as to existing and new infrastructure, since a mixture of both are required for sustainable forms of new development and modes. The policy should be expanded to require new development to contribute towards increased public transport and accessibility. The supporting text (Paragraph 9.2.8) suggests that a 'Development Management Document' will include the criteria for location of development, requirement for transport assessments and travel plans, London Plan densities and guidance on section 106 contributions. These requirements should be included within DPD policy and not an SPD. Transport for London should be fully consulted on the preparation of any such DPD policy.</p>

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CORE POLICY 29: PROMOTING SUSTAINABLE TRANSPORT CHOICES AND IMPROVING ACCESS FOR PEOPLE WITH RESTRICTED MOBILITY	Preferred Option	Ms Anna Chapman	Planner British Waterways-London Region	British Waterways request that this policy explicitly states that the Council promotes waterborne freight and passenger transport as sustainable transport choices, in accordance with Policies 3C.24 and 4C.14.
CORE POLICY 29: PROMOTING SUSTAINABLE TRANSPORT CHOICES AND IMPROVING ACCESS FOR PEOPLE WITH RESTRICTED MOBILITY	Preferred Option	Mr Andrzej Warhaftig	Business Manager Enterprise Enfield	Core Policy 29 is supported, with the comment that the cycling facilities should be as motor free as can be designed. Cycling lanes on busy roads are not an acceptable solution.
CORE POLICY 29: PROMOTING SUSTAINABLE TRANSPORT CHOICES AND IMPROVING ACCESS FOR PEOPLE WITH RESTRICTED MOBILITY	Preferred Option	Mr Chris Baker	Government Office for London	Much of this policy restates national regional guidance and is unnecessary without any additional local dimension. Also, the penultimate bullet mentions "using maximum parking standards, where appropriate". This potentially conflicts with PPG13 and the London Plan and should be revised.

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CORE POLICY 29: PROMOTING SUSTAINABLE TRANSPORT CHOICES AND IMPROVING ACCESS FOR PEOPLE WITH RESTRICTED MOBILITY	Preferred Option	Mr Dominic Coath	Natural England	Natural England sees a fully integrated sustainable transport system that promotes public transport and encourages more walking and cycling as a key component of any vision for the Borough.
CORE POLICY 29: PROMOTING SUSTAINABLE TRANSPORT CHOICES AND IMPROVING ACCESS FOR PEOPLE WITH RESTRICTED MOBILITY	Preferred Option	Mr Matthew Roe (CgMs)	Senior Associate Director Metropolitan Police Authority	Policy 29 seeks to apply maximum parking standards where appropriate and encourage reduced parking provision in locations where appropriate. As outlined in our previous representation dated 30th May 2007 [see attached], it is recommended the Council's transport policy reflects the operational needs of the police which have impacts on their car parking requirements. This is supported by Policy 2A.9 of the London Plan which provides criteria to ensure communities are sustainable and which support the improvement of services, including policing.
CORE POLICY 29: PROMOTING SUSTAINABLE TRANSPORT CHOICES AND IMPROVING ACCESS FOR PEOPLE WITH RESTRICTED MOBILITY	Preferred Option	Mr Graham Saunders	Senior Regional Planning Advisor English Heritage - London Region	We support the desire to improve the public realm, fostering road safety and implementing the 'Streets for People' initiative. However we would seek to ensure that when improving the public realm consideration is given to the historic environment and that the 'Streets for People' initiative incorporates the principles set out in the English Heritages 'Streets for All' initiative, such as de-cluttering of street signage and furniture.

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CORE POLICY 29: PROMOTING SUSTAINABLE TRANSPORT CHOICES AND IMPROVING ACCESS FOR PEOPLE WITH RESTRICTED MOBILITY	Preferred Option	Ms Sule Nisancioglu	Group Manager, Planning Policy and Transportation London Borough of Haringey	The phrase "using maximum car parking standards where appropriate" is unclear as no information is provided on where it is considered maximum car parking standards are appropriate. It is considered the 5th and 6th bullet points are making the same comment i.e. the use of reduced or maximum parking at appropriate locations.
CORE POLICY 29: PROMOTING SUSTAINABLE TRANSPORT CHOICES AND IMPROVING ACCESS FOR PEOPLE WITH RESTRICTED MOBILITY	Preferred Option	Mr Patrick Blake	Network Strategy Highways Agency	The HA welcomes proposals in Core Policy 29 to facilitate car clubs and car share schemes. It is understood that further details will be provided in the forthcoming Development Management Document. In order to ensure maximum uptake, it is recommended that this document gives clear guidance to developers outlining when such schemes will be required. It is noted that Core Policy 29 states that the Borough will use maximum parking standards "where appropriate". The HA is concerned that this approach is not in line with Regional Guidance as set out in the London Plan. In addition, it should be noted that paragraph 49 of PPG13 states that provision of excess parking is likely to boost the attractiveness of the private car to the detriment of more sustainable alternatives. Therefore, as also stated in our response to the Issues and Options Report, the HA recommends that Core Policy 29 should be re-worded to be in line with London Plan guidance. This will ensure that sustainable travel is encouraged, in line with Strategic Objective 21, and that the Plan meets with PPS12 (paragraph 4.24) Test of Soundness 4.
CORE POLICY 29: PROMOTING SUSTAINABLE TRANSPORT CHOICES AND IMPROVING ACCESS FOR PEOPLE WITH RESTRICTED MOBILITY	Preferred Option	Duncan Bennett (CgMs Consulting)	Senior Associate Director Fairview New Homes Ltd	Fairview New Homes supports the principles of Core Policy 29. Specifically it supports the principle of using maximum parking standards where appropriate and encouraging reduced parking provision in locations where appropriate. This is in line with the provisions of PPG13 and Policies 3C.1 and 3C.23 of the London Plan.

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CORE POLICY 29: PROMOTING SUSTAINABLE TRANSPORT CHOICES AND IMPROVING ACCESS FOR PEOPLE WITH RESTRICTED MOBILITY	Preferred Option	Mr Giles Dolphin	Planning Decisions Manager Greater London Authority	Objection and comment: Transport for London objects to the current format of this policy and subtext as both are inconsistent with the London Plan. In particular, Transport for London strongly objects to any policy (or subtext) which allows car parking above 'maximum' standards. Any reference to 'minimum' standards should be removed. The fifth bullet point of paragraph 9.2.16 should state that the Borough will rigorously implement maximum car parking standards in accordance with Annex 4 of the London Plan. The text in paragraph 9.2.16 suggests that the 'Development Management Document' will include parking standards, criteria for car free development, criteria for car reduced development and car clubs, cycle parking standards and delivery and servicing strategies. These requirements, and those relating to the pooling of section 106 contributions for transport, should be included in the Core Strategy or other DPD policy and not in an SPD or the subtext of a Core Strategy policy. Transport for London should be fully consulted on the preparation of any such DPD policy.
Transport infrastructure	9.3	Ms Sule Nisancioglu	Group Manager, Planning Policy and Transportation London Borough of Haringey	Para 9.3.6 - The proposed Northern Gateway Access Package should not encourage more use of the car for commuting. The evaluation of the package should assess the impact on Haringey roads particularly in the Tottenham area. The Council would not support a package of measures which could encourage more car travel into and through the Borough.
Transport infrastructure	9.3	Mr Giles Dolphin	Planning Decisions Manager Greater London Authority	Comment: Paragraph 9.3.20: Transport for London does not generally support and is unlikely to fund any proposals to increase road capacity. The text mentions the LIP but Transport for London will not use this form of funding towards such road improvements unless this is intrinsically linked to improving public transport provision and sustainability. Comment: Paragraph 9.3.23. The Council's rejection of the option for a Northern Gateway Access Road (NGAR) is welcomed but Transport for London objects to any reference to the Northern Gateway Access Road (NGAR) in the LDF. This reference should be removed. Comment: Paragraph 9.3.26. The movement of freight is considered in greater detail in the most recent version of the London Plan, particular emphasis is given to freight movement by rail and water. This should be reflected in this section of the Core Strategy.
CORE POLICY 30: CROSS CUTTING INFRASTRUCTURE IMPROVEMENTS	Preferred Option	Mr Andrzej Warhaftig	Business Manager Enterprise Enfield	Core Policy 30 is supported

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CORE POLICY 30: CROSS CUTTING INFRASTRUCTURE IMPROVEMENTS	Preferred Option	Mr Mark Hayes	The Chair Enfield Housing Association Forum	CORE POLICY 30 The opportunity for use of rail and waterway modes for freight transport, related to business development in the Lee Valley corridor, should be exploited, and emphasised in this policy.
CORE POLICY 30: CROSS CUTTING INFRASTRUCTURE IMPROVEMENTS	Preferred Option	Ms Sule Nisancioglu	Group Manager, Planning Policy and Transportation London Borough of Haringey	The second paragraph refers to transport infrastructure improvements in North East Enfield and other places although no proposals are provided making it impossible to come to a view on these.
CORE POLICY 30: CROSS CUTTING INFRASTRUCTURE IMPROVEMENTS	Preferred Option	Mr Giles Dolphin	Planning Decisions Manager Greater London Authority	Objection and Comment: Transport for London objects to reference to using highway improvements when there should be a greater emphasis on public transport improvements in this policy. The policy should include reference to role of Opportunity Area Planning Framework's in identifying the necessary public transport infrastructure improvements. A reference to the current London Plan should be added to the first paragraph and the role of public transport in supporting deprived communities, in regeneration and in promoting London's role as world class city.
CORE POLICY 31: WALKING AND CYCLING	Preferred Option	Mr Andrzej Warhaftig	Business Manager Enterprise Enfield	Core Policy 31 is supported, with the comment that in certain areas, the walkers and cyclist should have priority
CORE POLICY 31: WALKING AND CYCLING	Preferred Option	Ms Anna Chapman	Planner British Waterways-London Region	This policy should explicitly mentioned the Council's intention to work with British Waterways and Lee Valley Regional Park to improve the condition of the towpath along the River Lee Navigation, particularly through seeking planning obligations to secure financial contributions towards towpath improvements or works in kind.
CORE POLICY 31: WALKING AND CYCLING	Preferred Option	Mr Dominic Coath	Natural England	Natural England sees a fully integrated sustainable transport system that promotes public transport and encourages more walking and cycling as a key component of any vision for the Borough.

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CORE POLICY 31: WALKING AND CYCLING	Preferred Option	Mr Stephen Wilkinson	Head of Planning and Regeneration Lee Valley Regional Park Authority	Core Policy 31 Walking and Cycling is supported by the Authority. It seeks to ensure safe, convenient and accessible pedestrian and cyclist access for recreation and movement between sites by promoting high quality walking and cycle routes such as the Lee Valley Walk and National Cycle Routes.
CORE POLICY 31: WALKING AND CYCLING	Preferred Option	Mr Giles Dolphin	Planning Decisions Manager Greater London Authority	Support and comment: This policy is welcomed. Reference should be made to Transport for London as a partner and there should be greater recognition that walking and cycling is a form of public transport. Reference should also be made to the role of section 106 contributions and travel plans in improving these networks. Consideration should be given to placing greater emphasis on the importance of information, behavioural/lifestyle and demand management measures, as well as to existing and new infrastructure or facilities, since a mixture of both are required for sustainable forms of new development and modes of travel. An additional bullet point in the policy on 'reducing traffic growth' should also be considered, since this is one of the first considerations in encouragement of walking and cycling and would tie the policy better to the Council's Local implementation Plan.
CORE POLICY 32: PUBLIC TRANSPORT	Preferred Option	Mr Mark Hayes	The Chair Enfield Housing Association Forum	CORE POLICY 32 The LDF should include a commitment to achieving a significant improvement in the environment as well as safety of railway stations, making these attractive and welcoming facilities for rail users. The policy needs to be strengthened.
CORE POLICY 32: PUBLIC TRANSPORT	Preferred Option	Mr Dominic Coath	Natural England	Natural England sees a fully integrated sustainable transport system that promotes public transport and encourages more walking and cycling as a key component of any vision for the Borough.
CORE POLICY 32: PUBLIC TRANSPORT	Preferred Option	Mr Patrick Blake	Network Strategy Highways Agency	The HA is supportive of proposals to improve public transport in the Borough, in particular in the Upper Lee Valley. The HA recommends that improvements to public transport should seek to ensure that development in the Borough of Enfield has a nil-detriment impact on the SRN, in line with paragraph 4.51 of DfT Circular 02/2007. In order to ensure that this is the case, it is recommended that the overall level of public transport provision delivered through the LDF should be an output of the Evaluation of Transport Impacts discussed in paragraphs 28 to 30 above. It is important that clear delivery mechanisms are in place to ensure the timely delivery of these proposals. We would refer you to our comments in relation to Section 11 (Implementation) below.
CORE POLICY 32: PUBLIC TRANSPORT	Preferred Option	Mr Stephen Wilkinson	Head of Planning and Regeneration Lee Valley	Policy 32 on Public Transport is also supported.

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			Regional Park Authority	
CORE POLICY 32: PUBLIC TRANSPORT	Preferred Option	Mr Giles Dolphin	Planning Decisions Manager Greater London Authority	Support: This policy is welcomed.
CORE POLICY 33: ROAD NETWORK	Preferred Option	Mr Brian Whiteley	Environmental Services London Borough of Waltham Forest	These comments also apply to section 10.4 on the Preferred Option for the North Circular Area. This Council supports the existing proposed Transport for London Safety and Environmental Scheme for improvements to the North Circular Road (A406) between Green Lanes and Bounds Green as it has significant benefits for buses, cyclists and pedestrians. The current wording of the policy refers to further improvements to this part of the North Circular Road. This Council would not support further improvements beyond the Transport for London Safety and Environmental Scheme – if they involved significant additional road traffic capacity.
CORE POLICY 33: ROAD NETWORK	Preferred Option	Mr Stephen Wilkinson	Head of Planning and Regeneration Lee Valley Regional Park Authority	The Authority welcomes the fact the under Policy 33 Road Network the Council has rejected the option to seek the provision of a Northern Gateway Access Road (NGAR) "without the implementation of a package of measures to support sustainable modes of transport..." However it is unclear how this policy option would operate and whether the Council still harbours an ambition to pursue this option providing the appropriate package of support is in place. The Authority seeks clarification on this matter.
CORE POLICY 33: ROAD NETWORK	Preferred Option	Mr Giles Dolphin	Planning Decisions Manager Greater London Authority	Objection and comment: Transport for London object to the wording of this policy. Public transport should be promoted as a way of easing road traffic and congestion and not highway improvements. Highways should be developed to ease bus, pedestrian and cycle movement. The Council should consider strengthening the policy by reference to the Council's agreement, through its Local Implementation Plan to aim to ensure road traffic growth is reduced. This would be a useful key aim of the road network policy since it assists congestion reduction, cycling and walking as well as environmental improvement. Inclusion of road traffic reduction would also help link the policy to the Council's Local Implementation Plan.
CORE POLICY 34: FREIGHT	Preferred Option	Mr Andrzej Warhaftig	Business Manager Enterprise Enfield	Core Policy 34 is supported

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CORE POLICY 34: FREIGHT	Preferred Option	Mr Mark Hayes	The Chair Enfield Housing Association Forum	CORE POLICY 34 The policy should recognise the opportunity to achieve a major waste processing/recycling facility using rail and water-borne movement of freight.
CORE POLICY 34: FREIGHT	Preferred Option	Mr Patrick Blake	Network Strategy Highways Agency	The HA welcomes the proposals in Core Policy 34 to promote the sustainable movement of freight. However the HA is concerned that the Core Strategy does not identify the need to safeguard sites such as wharves and rail freight interchanges which promote the sustainable movement of freight. PPG13 paragraph 45 specifies that safeguarding of such sites can help to promote sustainable distribution, including where feasible, the movement of freight by rail and water. It is therefore recommended that the Core Strategy should identify and safeguard appropriate sites. This will help to ensure the document is in line with PPS12 Test of Soundness 4.
CORE POLICY 34: FREIGHT	Preferred Option	Mr Giles Dolphin	Planning Decisions Manager Greater London Authority	Support and comment: The intent of this policy is welcome. Transport for London should be added to the list of partners and this policy should be reviewed against most recent version of the London Plan to ensure consistency and any wording amended as necessary.
Area Strategies for Growth & Change	10	Mr Chris Baker	Government Office for London	The content of these is appropriate for the core strategy, but the location and form of them is puzzling. They should be part of the main strategy and the policies should reflect them (ie. the main strategy and all the policies should refer to the fact that AAPs will be prepared for these key areas with specific policy initiatives listed). They should not just be a section at the end of the plan. As they stand, with no specific policies attached, their purpose is unclear.
Area Strategies for Growth & Change	10	Ms Karen Foster-	Planning Liaison Officer Environment Agency	This section needs to be rewritten to explain that three of the AAPs (Central Leaside, NE Enfield and the A406) are located in areas at high risk of flooding in accordance with your SFRA.

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Area Strategies for Growth & Change	10	Mr Brian Whiteley	Environmental Services London Borough of Waltham Forest	The area strategies for those parts of Enfield where growth or change are proposed are still at an early stage and taking shape. Accordingly, this Council would need to reserve its opinion on proposals for the Central Leaside area (noted at paragraphs 10.2.4 – 10.2.10) and North East Enfield (noted at paragraphs 10.2.11 – 10.2.14) until they are further developed at the Preferred Options stage. There is one area of concern which officers here wish to raise on the Preferred Options document regarding future proposals for the Bounds Green to Green Lanes section of the North Circular Road. A completed response form is attached which notes this.
Area Strategies for Growth & Change	10	Mr Graham Saunders	Senior Regional Planning Advisor English Heritage - London Region	It is essential that the emerging AAPs demonstrate clearly and robustly that the Borough's heritage assets, their settings and the wider historic environment is sufficiently identified and valued, and given due care and consideration when developing policies and proposals for change. At present only the Preferred Option for Enfield Town centre makes reference to the historic environment. It is appreciated that this maybe a reflection of heritage of the town centre, but care should be taken in the other growth areas, so that their own distinctive historic environment is carefully identified, valued and integrated into future changes.
Area Strategies for Growth & Change	10	Mr John McGill	Deputy Director North London Strategic Alliance	NLSA welcomes the development of area action plans for Central Leaside and North East Enfield and their reference to the new vision for the Upper Lee Valley. NLSA supports the strategic objectives set out on page 98 although we would also suggest inclusion of the phrase 'to make the Lee Valley regional Park' more accessible to nearby communities.
Area Strategies for Growth & Change	10	Mr Patrick Blake	Network Strategy Highways Agency	We have provided comment on the Area Action Plans (MPs) produced for Enfield Town and the North Circular Area, and will shortly be submitting our comments in relation to the North East Enfield and Central Leaside MPs. We would therefore refer you to these representations.
Area Strategies for Growth & Change	10	Austin Mackie (DTZ Development & Planning)	Director St Modwen	As previously stated, it is considered that town centres, and in particular Edmonton Green, represent key elements within the Borough's future spatial development strategy. We feel that the regenerative ad development potential of such locations should be specifically addressed within this section of the CS. The present focus on areas excluding Edmonton Green risks undermining the focus that continues to be required on its physical, social and environmental regeneration. Indeed, we do not consider that there is an adequate policy framework for spatially addressing the areas for regeneration that are identified on the draft proposals map.

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Area Strategies for Growth & Change	10	Mr Giles Dolphin	Planning Decisions Manager Greater London Authority	The identification of Central Leaside, North East Enfield, Enfield Town and the North Circular Road as foci for growth and change is generally supported. However, it is essential that policies for Central Leaside and North East Enfield are developed in the context of the Upper Lea Valley Opportunity Area Planning Framework. Similarly the section on the North Circular Road needs to accurately acknowledge the role of the TfL improvement scheme and the need to work closely with TfL as the major stakeholder in this area.
Introduction	10.1	Caroline Dawson (Planning Potential)	Director Kier Property Developments Ltd and the Ponders End Trust	Our clients' area of interest at the Ponders End Industrial Estate falls within the coverage of Chapter 10 of the Core Strategy and our clients endorses the Objectives to improve various characteristics of the North East Enfield area and "to connect with the waterfront and draw the high quality natural environment of the Lee Valley into the heart of the nearby community". The mixed use redevelopment of the Ponders End Industrial Estate in line with our client's proposals would satisfy both of these Strategic Objectives.
Introduction	10.1	Mr Giles Dolphin	Planning Decisions Manager Greater London Authority	Support: These objectives are generally supported.
Introduction	10.1	David Phillips (GL Hearn)	Planning Director Hadley Homes	10.1 Introduction with reference to para. 10.1.1 and Figure 10.1. The development of area strategies for those parts of Enfield where significant growth or change is proposed is supported. However the precise delineation of the Area Action Plans as identified at Figure 10.1 presupposes the separate consultation that is taking place on the various Area Action Plans. We are particularly concerned with the western boundary of North East Area Action Plan, as set out in our submissions to the North East Enfield Area Action Plan Issues and Options Report, should be extended in part to the east to include the corridor of the A10 Great Cambridge Road.
The Upper Lee Valley	10.2	Mr Mark Matthews	Thames Water Property	We support the strategic objectives for Section 10 of the Core Strategy. We particularly support the need to improve the environment, infrastructure and economic and social well being of North East Enfield and Central Leaside. There will be requirements to upgrade our infrastructure in North East Enfield and Central Leaside, and we would support policies that enable our infrastructure to be provided in a timely and sustainable fashion.
The Upper Lee Valley	10.2	Mr Mark Matthews	Thames Water Property	King George V and William Girling Reservoirs. Of particular importance to Thames Water in providing water to London are the King George V and William Girling reservoirs located along the Lee Valley. We note their value as a visual, ecological and recreational resource, but their most important role is in helping to provide water for London – and this fundamental role should not be compromised by policies that undermine our ability to provide potable water for London or could restrict the future upgrade and improvement of our infrastructure. Through Thames

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				Water's Property and Conservation strategies we do consider the potential for access and use of our existing assets where appropriate. There is limited restricted public access in the form of sailing on the King George V Reservoir but this does not extend to general public access. Both reservoirs have strict general public access controls because of security and health and safety requirements. Security and health and safety requirements are our number one priority in supplying water via our reservoirs along the Lea Valley and thus this strict access control is unlikely to change in the foreseeable future. Discussions between Thames Water, Enfield Borough officers and their consultants are taking place to consider opportunities to enhance the Lea Valley Park without compromising on Thames Water's responsibilities as a statutory undertaker. However at this early stage we would not be in a position to support policies that sought the opening up of access to the Reservoirs.
The Upper Lee Valley	10.2	Ms Jill McGregor (GL Hearn)	Tesco Stores Ltd	10.2.1-10.2.11: Tesco supports the Council's preferred option for the Central Leaside Area to create a sustainable community by consolidating its commercial role, developing new employment opportunities and encouraging mixed uses including retail development. Tesco recognises that the potential exists for a vibrant mixed use community within the Angel Road sub-area and would welcome discussion with the Council on how a development partnership could be achieved.
The Upper Lee Valley	10.2	Mr Giles Dolphin	Planning Decisions Manager Greater London Authority	Comment: Paragraph 10.2.4-10.2.10. Reference to the 'Central Leaside' area discusses the long term phasing in of the development. Such a strategy requires an understanding of the relationship between transport and land use and development quantum based including improvements to public transport links. Areas identified for development would require a significant increase in accessibility by public transport and other sustainable modes, to support major redevelopment. A comprehensive and integrated transport strategy needs to be developed and this should be made clear in the preferred area strategy.
The Upper Lee Valley	10.2	David Phillips (GL Hearn)	Planning Director Hadley Homes	10.2: The Upper Lee Valley with particular reference to 'Preferred Option North East Number Enfield' and paras. 10.2.11 to 10.2.14. The development of area strategies for those parts of Enfield where significant growth or change is proposed is supported. However the precise delineation of the Area Action Plans as identified at Figure 10.1 presupposes the separate consultation that is taking place on the various Area Action Plans. We are particularly concerned with the western boundary of North East Area Action Plan, as set out in our submissions to the North East Enfield Area Action Plan Issues and Options Report, should be extended in part to the east to include the corridor of the A10 Great Cambridge Road.

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CENTRAL LEESIDE	Preferred Option	Mr Dominic Coath	Natural England	We support the Council's vision of a 'Central Leaside to be an exemplar eco community respecting its environmental constraints and maximizing opportunities for new communities and waterside living.' Natural England looks forward to working closely with the Council to realise the environmental component of this.
CENTRAL LEESIDE	Preferred Option	Mr Mark Matthews	Thames Water Property	Land south of William Girling Reservoir (see attached plan 2). The majority of this site is currently used for a waste management use It is considered that there are exceptional circumstances for releasing the site from the Green Belt as redeveloping the site for commercial, employment, leisure or a waste use can play a fundamental part in helping to transforming and improving the Central Leaside Area.
CENTRAL LEESIDE	Preferred Option	Mr John McGill	Deputy Director North London Strategic Alliance	The area covered by the Central Leaside Area Action Plan should show a clear relationship with Edmonton Green which will be considerably affected should the area become a site for significant mixed use development. This point is also relevant for North Chingford in Waltham Forest.
CENTRAL LEESIDE	Preferred Option	Ms Vilna Walsh (First Plan)	Director National Grid Property Holdings	The Council's preferred area strategy for Central Leaside is supported on the basis that it seeks to make best use of underused or vacant employment sites in the Angel Road area around the North Circular Road and underscores the potential which exists to transform the area. Representations and comments made to the Preferred Option Core Policy 17, in respect of the scale and location of employment activities, are also relevant in the context of the Central Leaside Preferred Option. In developing the Preferred Option for Central Leaside it is considered of key importance that recognition is made of a number of key sites which have limited prospect, if any, of being brought forward for employment uses but which are strategically well located within the Central Leaside area to offer key regeneration opportunities and are considered to be integral to unlocking the potential of the area. This is particularly the case with respect to the National Grid sites at Willoughby Lane, the Tear drop site at Meridian Way and the Leaside Road Gas Holder Site. The opportunity to bring these National Grid sites forward for development at the earliest opportunity, and in particular securing the removal of the gas holders, both from health and safety and visual perspectives, should be a key element of the preferred option for Central Leaside and should be a principle consideration in developing the vision for the future development of the wider area. Further comments are made in this respect with regard to the Issues and Options consultation for the Central Leaside AAP which considers options for scale and nature of change within the area. The following wording, shown in bold and underlined, should be added to the first paragraph of the Preferred Option for Central Leaside. ...Development will be coordinated to ensure a successful relationship between different land uses. Significant development in parts of Central Leaside will provide the opportunity to secure major community infrastructure and sustainable travel. Key emphasis is placed on the importance of securing the early removal of the operational gas holders at Willoughby Lane (Kimberley Road) and Leaside Road and will be fully supported. We want Central Leaside to be an exemplar eco community respecting its environmental constraints and maximising

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				opportunities for new communities and waterside living.
CENTRAL LEESIDE	Preferred Option	Miss Renee Goodwin (GVA Grimley Ltd)	Principal Planner La Salle Investment Management	We support the policy which notes that the preferred area strategy for Central Leaside is to work with partners to transform the area into a series of vibrant and sustainable communities in the heart of the Upper Lee Valley and noted that development will be coordinated to ensure a successful relationship between different land uses. The policy also notes that within the context of the area strategy, alternative options for the appropriate scale and nature of change given the local circumstances, the type of intervention and where to focus it will need to be considered as part of the Area Action Plan's preparation.
CENTRAL LEESIDE	Preferred Option	Philip Murphy	Associate RPS	Dwyer manage land and property within the Central Leaside area and are supportive of the Preferred Option identified for this part of the Borough (Page 101). Dwyer endorse the proposal that Central Leaside is to 'transform ...into a series of vibrant and sustainable communities in the heart of the Upper Lee Valley, maximising the benefits of the regional park, consolidating its commercial role, developing new employment opportunities and embracing new technologies'. However, a number of other policies within this document potentially restrict the ability for this vision to be delivered.
CENTRAL LEESIDE	Preferred Option	Mr Giles Dolphin	Planning Decisions Manager Greater London Authority	Support with conditions: The broad intent of this area strategy is welcomed and it is supported subject to the comments below, and elsewhere in this consultation response, being fully taken into account in the submission version. In particular the wording of the preferred option for the area strategy should clearly state that it, and the Area Action Plan, will take account of the emerging Opportunity Area Planning Framework for the Upper Lee Valley, along with other strategic planning policy requirements.
NORTH EAST ENFIELD	Preferred Option	Mr Dominic Coath	Natural England	This is another area where significant environmental gains can be realised for both people and wildlife and again we would like to work with the Council to achieve this.
NORTH EAST ENFIELD	Preferred Option	Ms Sule Nisancioglu	Group Manager, Planning Policy and Transportation London Borough of Haringey	North East Enfield The access to M25 should not encourage more use of the car for commuting. The evaluation of the improvement package should assess the impact on Haringey roads particularly in the Tottenham area. The Council would not support a package of measures which could encourage more car travel into and through the Borough.

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NORTH EAST ENFIELD	Preferred Option	Mr Mark Matthews	Thames Water Property	Ponders End Pumping Station site (see attached plan 1). Thames Water would support opportunities for mixed use (employment, commercial and leisure) development in this location and would welcome further discussion with the Borough Council. A site plan of the location of the Pumping Station is attached.
NORTH EAST ENFIELD	Preferred Option	Ms Vilna Walsh (First Plan)	Director National Grid Property Holdings	The Preferred Option for North East Enfield is broadly supported. However, there should be express reference to the key potential there exists to provide good quality new residential development within Ponders End. Specifically, National Grid's site at Falcon Road offers key regeneration, visual amenity and public realm opportunities through removal of currently operational gas holders. The following wording, shown in bold and underlined [see full representation attached], should be added to the end of the first paragraph of the Preferred Option for North East Enfield: ...We want to explore the opportunities for waterside development and the benefits for leisure and recreation so close to the regional park. We want to assist in securing the redevelopment of key opportunity sites in close proximity to Ponders End Station and view the removal of the gas holders at Woodall Road/Falcon Road as the catalyst for securing high quality residential development, regeneration objectives and public realm improvements.
NORTH EAST ENFIELD	Preferred Option	Caroline Dawson (Planning Potential)	Director Kier Property Developments Ltd and the Ponders End Trust	Kier Property Developments and The Trust support the Council's identification of North East Enfield as an area justifying a particular planning approach and agrees with the Council's interpretation of the characteristics of the area. Our clients also endorse the creation of a specific Preferred Option for the North East Enfield area but feels that it is, perhaps, too vaguely phrased to assist in the achievement of the Core Strategy objectives. Whilst it is accepted that the Area Action Plan will provide greater detail, it is considered that the Preferred Option as currently expressed is inadequately specific to provide adequate guidance. Rather, in line with other Core Strategy objectives, our clients encourage the incorporation within this Preferred Option of the following; <ul style="list-style-type: none"> • The recognition of Ponders End as having the potential for the creation of a new waterfront with opportunities for mixed use and leisure development, with better links to the station (paragraphs 10.2.2). • The enhancement of east-west connections between the Lee Valley, the reservoirs and residential communities (reference paragraph 10.2.2). • The acceptance of mixed used developments on land currently solely used for employment (eg. the Ponders End Industrial Estate) in order to effect the above and to achieve mixed and sustainable communities. • The reintegration of the various land use aspects of the North East Enfield area to achieve a more mixed and sustainable urban form.

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NORTH EAST ENFIELD	Preferred Option	Mr Giles Dolphin	Planning Decisions Manager Greater London Authority	Support with conditions: The broad intent of this area strategy is welcomed and it is supported subject to the comments below, and elsewhere in this consultation response, being fully taken into account in the submission version. In particular the wording of the preferred option for the area strategy should clearly state that it, and the Area Action Plan, will take account of the emerging Opportunity Area Planning Framework for the Upper Lee Valley, along with other strategic planning policy requirements.
Enfield Town	10.3	Mr Giles Dolphin	Planning Decisions Manager Greater London Authority	Comment: Paragraph 10.3. The reference to Enfield Town states that there is an opportunity to improve the eastern gateway and public transport interchange by improving access to the station and by co-ordinating bus routes. This wording should acknowledge that any changes in provision of bus infrastructure need to be agreed with Transport for London, and that land which currently supports the provision of bus network should not be lost to other uses, unless alternative and suitable sites can be made available.
ENFIELD TOWN	Preferred Option	mr gary thomas	Lionsgate Properties (Planning Works Ltd.)	The general vision for Enfield Town and the focus on the eastern end of the town centre is supported. However within that vision, alongside new retail development other specific uses should be specified. Core Policy 10 refers to town centres as a location for new residential development and this should be reflected and reinforced here. This should also be linked with Core Policy 24 where residential use and the role it can play in regeneration should be fully recognised. In relation to the coordinated approach, this should not be at the expense of individual developments which in themselves make a significant contribution to regeneration and can often act as a catalyst for further development. The danger of promoting such significant change over a wide area that development is discouraged should be avoided.
ENFIELD TOWN	Preferred Option	Rose Freeman	Planning Assistant The Theatres Trust	Town centres are the heart of communities and an expression of their culture and identity. As well as shops they should provide a range of functions such as leisure, recreation and culture centred on restaurants, pubs, clubs, theatres, cinemas, libraries and museums. As such all these elements play an active role in creating and maintaining vibrant town centres and a stimulating night-time economy. It is expected that the Core Strategy should contain a policy to introduce a strategy for the town centre as it is the role of the Core Strategy is to set out the scale of development envisaged with an AAP to focus on how the strategy will be delivered.
ENFIELD TOWN	Preferred Option	Duncan Bennett (CgMs Consulting)	Senior Associate Director Fairview New Homes Ltd	PREFERRED OPTION - ENFIELD TOWN - PAGE 105 Whilst Fairview New Homes supports the Council's strategy of retaining and developing Enfield town's role as a lively major town centre, it is considered that the preferred option fails to sufficiently emphasise the need for additional residential development within the town centre to improve vitality and viability and the evening economy. This is not in accordance with PPS1 and PPS6.

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ENFIELD TOWN	Preferred Option	Mr Giles Dolphin	Planning Decisions Manager Greater London Authority	Support with conditions: The broad intent of this area strategy is welcomed and it is supported subject to the comments below, and elsewhere in this consultation response, being fully taken into account in the submission version.
The North Circular Area	10.4	Mr Brian Whiteley	Environmental Services London Borough of Waltham Forest	These comments also apply to section 10.4 on the Preferred Option for the North Circular Area. This Council supports the existing proposed Transport for London Safety and Environmental Scheme for improvements to the North Circular Road (A406) between Green Lanes and Bounds Green as it has significant benefits for buses, cyclists and pedestrians. The current wording of the policy refers to further improvements to this part of the North Circular Road. This Council would not support further improvements beyond the Transport for London Safety and Environmental Scheme – if they involved significant additional road traffic capacity.
The North Circular Area	10.4	Mr Giles Dolphin	Planning Decisions Manager Greater London Authority	Comment: Paragraph 10.4.1. The text in this paragraph should clearly recognise that the Transport for London improvement scheme is to improve sustainability and road safety and includes improving conditions for cyclists, pedestrians and buses. It should be made clear in the area strategy that work on the North Circular must be worked up in partnership with Transport for London as it is part of the Transport for London Road Network and owns or has interests in a number of properties and sites alongside this part of the network. Transport for London suggests rewording the relevant part of this paragraph as follows: "Transport for London is working with the Borough to improve both the A10 and A406, especially in terms of road safety, cycling, urban environment, bus stops and bus priority and to reduce congestion."
THE NORTH CIRCULAR AREA	Preferred Option	Ms Vilna Walsh (First Plan)	Director National Grid Property Holdings	NGPH supports the preferred option for the North Circular Area, with particular reference to Enfield Gateway. In particular, NGPH land at New Southgate is well placed to contribute to these objectives by using existing land more efficiently through reconfiguring the existing, and introducing new uses consistent with the Council's aspirations for the land identified as Area 2: Retail Park/Gas Holder Site in the North Circular AAP.
THE NORTH CIRCULAR AREA	Preferred Option	Mr Giles Dolphin	Planning Decisions Manager Greater London Authority	Support with conditions: The broad intent of this area strategy is welcomed and it is supported subject to the comments below, and elsewhere in this consultation response, being fully taken into account in the submission version.

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Place Shaping - Delivering the Plan: the implementation and monitoring framework	11	James Stevens	Regional Planner (London) Home Builders Federation Ltd	Place Shaping â€ Delivering the Plan: the implementation and monitoring framework The list of matters which might give rise to s106 obligations is lengthy. Sites are finely balanced financially and are particularly sensitive to planning obligations. Guidance needs to be provided for developers regarding those obligations will be sought and on which of the key development sites. We should point out that the amount of development funding in relation to any particular development site is finite. The council is likely to have to sacrifice some policy objectives in order to achieve others if it is to receive any benefits at all, otherwise resources may be spread too thinly. The council, in taking this draft Core Strategy forward, should give some consideration to the issue of where affordable housing fits into its other corporate policy objectives and it should maybe consider some form of ranking or prioritisation of these objectives. The policy demands an open book approach in the event of a disagreement over the scale of s106 obligation sought. The council should instead adopt the GLA's Affordable Housing toolkit to calculate the viability of providing obligations in addition to affordable housing.
Place Shaping - Delivering the Plan: the implementation and monitoring framework	11	Mr Stephen Wilkinson	Head of Planning and Regeneration Lee Valley Regional Park Authority	The Authority welcomes the importance placed on partnership working and in particular the emphasis placed on the role of the Enfield Strategic Partnership. The Authority has found this to be a useful and productive partnership for delivering improvements to the Regional Park in Enfield. The Authority would wish to be consulted on the detail of the Development Management Document, Design Guide and Sites Schedule as they will be key mechanisms for implementing the Core Strategy and AAPs.
Implementation	11.1	Mr Patrick Blake	Network Strategy Highways Agency	It is noted that paragraph 11.1.3 identifies possible sources of funding to assist with the delivery of LDF policies and proposals. It is recommended that the Submission DPD should seek to identify a list of sustainable transport improvements required to mitigate the impacts of the Plan and the associated funding sources for each. This would be in line with the recommendations set out in the recent Planning Inspectorate guidance document 'Lessons Learnt Examining Development Plan Documents' (PINS, 2007).
Implementation	11.1	Mr Giles Dolphin	Planning Decisions Manager Greater London Authority	The Core Strategy needs to refer to the London Plan priorities for planning obligations and should refer to the need to meet the needs of small and medium enterprises.

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CORE POLICY 35: PLANNING OBLIGATIONS: GENERAL POLICY CONSIDERATIONS	Preferred Option	Rose Freeman	Planning Assistant The Theatres Trust	We support the inclusion of a policy in the Core Strategy for an overall approach to Planning Obligations and are pleased to see that 'cultural initiatives' (for clarity this should be amended to cultural facilities) is included. The Trust recognises the importance of planning obligations to assist theatre owners in becoming more self-reliant and to obtain better buildings by using the planning system and working with the private sector. We are concerned that theatre buildings do not benefit appropriately under the terms of S106 and other agreements, and that it will increasingly be necessary to unlock new sources of funding to help pay for significant improvements to them.
CORE POLICY 35: PLANNING OBLIGATIONS: GENERAL POLICY CONSIDERATIONS	Preferred Option	Mr Dominic Coath	Natural England	Green Infrastructure should be recognised as a key component of any planning obligations on a par with all the other types of infrastructures that are traditionally recognised as requiring contribution from development. Planning obligations should also provide for both the protection and enhancement of biodiversity and geodiversity.
CORE POLICY 35: PLANNING OBLIGATIONS: GENERAL POLICY CONSIDERATIONS	Preferred Option	Mr Matthew Roe (CgMs)	Senior Associate Director Metropolitan Police Authority	The Council's Issues and Options report made reference to 'police stations' as example of community facilities with regard to social infrastructure and planning contributions. However, no reference of police facilities has been made in the Preferred Options draft regarding planning obligations. The MPA believe it is reasonable to seek contributions towards policing needs where these directly arise as a result of significant development proposals. Furthermore, the London Plan reinforces policing as a material consideration and Policy 3A.18 states 'policing facilities' as an element of social infrastructure and community facilities. The London Plan seeks to protect and enhance such facilities, therefore the MPA recommend the range of provisions to be considered within Policy 35 should be expanded to include 'policing facilities'. This would reflect the spatial development plan by ensuring that the impact of large-scale development upon policing is mitigated.
CORE POLICY 35: PLANNING OBLIGATIONS: GENERAL POLICY CONSIDERATIONS	Preferred Option	Mr Graham Saunders	Senior Regional Planning Advisor English Heritage - London Region	We warmly welcome the inclusion of the built heritage as a recognised beneficiary of future planning obligations. We would seek to encourage the Council to ensure that any funds generated from future planning proposals are directed to key heritage area schemes and listed buildings identified on the Buildings at Risk Register.

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CORE POLICY 35: PLANNING OBLIGATIONS: GENERAL POLICY CONSIDERATIONS	Preferred Option	Miss Claire Morison	Drivers Jonas	To assist the LFEPA in continuing to provide a fast, effective and resilient emergency response, it considers that financial contributions towards improving and expanding current fire stations facilities and services should be identified within a policy on potential Section 106 requirement for development schemes. We support the opportunity for the involvement of stakeholders in the application of planning obligations where it is appropriate within the S.106 Agreement. LFEPA support the inclusion of fire and emergency services as a community facility, although it should be stated that developers should contribute towards these vital services through planning obligations. The LFEPA believes that the capacity of the key emergency services, such as fire and rescue services, to improve community safety and maintain a speed of emergency response in line with standards the LFEPA have set (see the London Safety Plan published in April 2005) is one such issue which should take into account when considering Section 106 agreements.
CORE POLICY 35: PLANNING OBLIGATIONS: GENERAL POLICY CONSIDERATIONS	Preferred Option	Mr John McGill	Deputy Director North London Strategic Alliance	The core policy 35: Planning Obligations: General Policy Considerations is welcomed but NLSA would wish to see specific reference to the Upper Lee Valley in this section to reinforce the point that the eastern side of the borough is part of the Lee Valley and that development should be seen in this context and should relate to the specific geography of the valley and improve links north to south and east to west. The delivery section of the strategy mentions work with other partners and is therefore welcomed. However, NLSA would wish to specific reference to the boroughs of Haringey and Waltham Forest in delivery of a shared vision for the Upper Lee.
CORE POLICY 35: PLANNING OBLIGATIONS: GENERAL POLICY CONSIDERATIONS	Preferred Option	Mr Patrick Blake	Network Strategy Highways Agency	It is noted that Core Policy 35 states that the appropriate and relevant provisions to be considered in planning obligations will be considered on a site by site basis. The HA is concerned that the policy does not indicate the likely size and scope of the contributions that will be sought. It is important that clear guidance is given to developers at an early stage as to what level of contribution will be expected. To this end the HA recommends that a Planning Obligations Supplementary Planning Document (SPD) for the borough should be produced, which should detail both the likely nature and scope of contributions which will be sought towards transport improvements in the Borough. This approach would be in line with PPG13, paragraph 83, and would also provide a firmer basis for investment decisions in the plan area. In addition, this would help to ensure that the document is in line with PPS12 (paragraph 4.24) Test of Soundness 4. In addition it is noted that the cumulative impact of developments and the need for pooled or phased obligations will also be taken into account. However it is not clear how cumulative impacts will be assessed and how the pooling and phasing of contributions will be managed. Again it is recommended that clear guidance is given to developers through a Planning Obligations SPD regarding the proposed mechanisms for assessing cumulative impacts, and the pooling and phasing of contributions.

Document Section	Section Number or Question	Name	Organisation	Response
CORE POLICY 35: PLANNING OBLIGATIONS: GENERAL POLICY CONSIDERATIONS	Preferred Option	Ms Vilna Walsh (First Plan)	Director National Grid Property Holdings	There is no in principle objection to preferred Option Core Policy 35 in as much as it appropriately makes reference to guidance set out in Circular 05/05 "Planning Obligations". However, whilst the range of provisions to be considered in obligations is listed it would clearly be of help to land owners and developers bringing forward sites for development if there were a Planning Obligations Supplementary Planning document to assist in providing a clear framework at the outset of the likely scale of contributions and means of calculating contributions for the various provisions envisaged. The drafting of such a document, based upon appropriate consultation together with a robust and transparent evidence base, should be a priority in taking forward the Enfield Local Development Framework. In addition to meeting the tests of Circular 05/05, viability based upon individual site circumstances is also a thread which should run through the preferred option for planning obligations and this should be made explicit in the policy. This is particularly important to cover situations where the abnormal costs associated with redeveloping previously developed land means that the ability to offer planning contributions is reduced. The London Plan states, within Policy 6A.4, that affordable housing and public transport improvements should generally be given the highest importance. The following wording, shown in bold and underlined, should be added at the end of the second paragraph: <u>The option of ranking these provisions in a priority order is rejected as being too inflexible, and not capable of allowing an optimum package of provisions to be secured which recognises individual site circumstances and local priorities in every case. However, in negotiating contributions individual site circumstances will be taken into account and particularly on those sites which give rise to abnormal costs it may be necessary to prioritise the provisions sought.</u>
CORE POLICY 35: PLANNING OBLIGATIONS: GENERAL POLICY CONSIDERATIONS	Preferred Option	Mr Stephen Wilkinson	Head of Planning and Regeneration Lee Valley Regional Park Authority	The Authority supports the inclusion of the following provisions; open space and recreation provision, landscape features, biodiversity and geodiversity protection, pedestrian and cycle access improvements as part of the range of provisions to be considered in planning obligations under Core Policy 35.

Document Section	Section Number or Question	Name	Organisation	Response
CORE POLICY 35: PLANNING OBLIGATIONS: GENERAL POLICY CONSIDERATIONS	Preferred Option	Mr Giles Dolphin	Planning Decisions Manager Greater London Authority	Support with conditions: This intent of this policy is welcomed and it is supported subject to the comments below being fully taken into account in the submission version. In particular the reference to the 'broad planning obligation priorities of the London Plan' in the second paragraph of the policy is welcomed but in order to be in general conformity this text should state what those priorities are, as set out in London Plan Policy 6A.4m which states that affordable housing and public transport improvements should generally be given the highest priority. The reference to pooled or phased obligations is welcomed. Comment: In the list of provisions to be considered in planning obligations, 'childcare provision' should read 'accessible and affordable childcare provision'. The LDA recognises the role that high quality childcare, which is both accessible and affordable, has in regeneration, supporting the needs of low income families as well as the needs of business in order to address this key barrier to employment. Comment: In accordance with London Plan Policy 3B.1 'Developing London's economy', the London Development Agency request that provision of accommodation to meet the needs of Small and Medium Enterprises and business start ups is included within list of provisions to be considered in planning obligations. Inclusion of such business workspace provision will also support the Mayor's Economic Development Strategy objectives to "Address barriers to enterprise start-up growth and competitiveness" and to "Maximise the productivity and innovation potential of London's enterprises".
CORE POLICY 35: PLANNING OBLIGATIONS: GENERAL POLICY CONSIDERATIONS	Preferred Option	Caroline Dawson (Planning Potential)	Director Kier Property Developments Ltd and the Ponders End Trust	Our clients welcome the Council's advice that it will adhere to the guidance set out in Circular 05/05 Planning Obligations when negotiating with applicants. However, our clients raise a concern with the following sentence in the final paragraph: "If disagreements arise over the reasonableness of the provisions sought through an obligation, the Council will expect an open book approach to be taken in examining the development finances of the proposals being considered". Reasonableness is a test included within Circular 05/05 and is not, necessarily, solely based on viability or the ability of a development scheme to fund planning obligation payments. Our clients, therefore, feel that the sentence is inappropriately phrased and places an obligation on future applicants which is inappropriate and out of line with Circular 05/05. It should be made clear that the planning authority will only expect applicants to allow an examination of the development finances where it is claimed that a scheme cannot fund the assumed obligations on the grounds of commercial viability.
Monitoring	11.2	Mr Peter O'Brien	Partnership Manager Learning Skills Council	The Learning and Skills Council should be added to Delivery / Implementation of Core Policy 16: Children and Young People's Plan

Document Section	Section Number or Question	Name	Organisation	Response
Monitoring	11.2	Mr Patrick Blake	Network Strategy Highways Agency	It is noted that the Sustainability Appraisal proposes to monitor car ownership and travel to work mode splits in the Borough. Whilst the HA supports these proposals, we recommend that consideration is given to including the following indicators within the SA: • The proportion of new development which is meeting its travel plan objectives; and • The level of growth of traffic on key routes within the Borough. We would also suggest that Travel Plans would be a way of monitoring traffic from new developments (PPG13 paragraph 90 refers). It may also be possible to use an area wide travel plan, as suggested above, with monitoring which could be applied to new and existing developments. This has been done with some success at the Whiteley Business Park near the M27 in Hampshire. Furthermore, paragraph 3.2.14 of DCLG Guidance Note 'Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents' states sustainability objectives should be expressed in the form of targets where practicable. In order to ensure that the emerging DPD focuses on improving sustainability, it is therefore recommended that key targets should be included within the Sustainability Appraisal. These could include, although need not be limited to, targets to "decrease traffic on key routes in the Borough" to "increase the proportion of trips by alternative modes to the private car" and to "reduce the average distance over which borough residents' travel to work". Inclusion of the above indicators and targets would help to ensure that the Plan meets PPS12 (paragraph 4.24) Test of Soundness 8.
Monitoring	11.2	Mr Giles Dolphin	Planning Decisions Manager Greater London Authority	Comment: It should be noted in developing the monitoring indicators that Transport for London objects to any reference to the NGAR in the LDF and Transport for London objects to any additional connections to the M25 (this also applies to the AAP's). Comment: The North Circular project is a project being delivered by Transport for London, working in partnership with the London Borough of Enfield and is primarily to improve both the A10 and A406, especially in terms of road safety, cycling, urban environment, bus stops and bus priority, and to reduce congestion. Comment: Appropriate annual monitoring performance indicators for transport policies might be drawn from, or developed from, those contained in the Council's Local Implementation Plan for transport (LIP).
The Local Development Framework Evidence Base	Appendix 1	Mr Giles Dolphin	Planning Decisions Manager Greater London Authority	Comment: The fourth strategy reference on page 118 should now be dated 2007 not 2006. It should now read: 'Local Implementation Plan.... 2006/7-2010/11 (Enfield Council 2007)' to reflect the fact of its subsequent completion in final form by the Council in 2007, following Mayoral LIP approval in 2007.
Core Strategy Preferred Options Illustrative Maps	Appendix 2	Mr Norman Smith	Coombehurst Close Residents Association	The maps 2.1 and 2.2 show that our part of Enfield (1a) sits uneasily on the edge of the Borough and arguably should be part of Barnet which is adjacent. This area is largely ignored in the Plan, perhaps rightly so because it is wealthier than many other parts of the Borough which, because they are with poorer population issues, have more pressing needs. Unfortunately the consequence is that the urgent needs of this area, such as transport, are relegated in deference

Document Section	Section Number or Question	Name	Organisation	Response
				to the other problems in the Borough.
Core Strategy Preferred Options Illustrative Maps	Appendix 2	Mr Graham Saunders	Senior Regional Planning Advisor English Heritage - London Region	It is essential that the Areas of Archaeological Importance are included on the map. This is a key designation supported by PPG 16 Archaeology and Planning, and its omission is not acceptable. In addition it may be useful to include the Schedule Ancient Monuments on the Map.
Core Strategy Preferred Options Illustrative Maps	Appendix 2	Kate Tinsley (Peacock and Smith)	WM. Morrison Supermarkets PLC	Chapter 8 highlights the Boroughs main town/district centres. Whilst it is recognised that a new proposals map will be produced as part of the emerging LDF at a later date, our client would request that the Council clearly identify/allocate (and show on the new proposals map) the existing Morrisons stores as follows: 1. Southbury Road, Enfield, EN1 1TW - within a designated retail park and identified as a suitable destination for additional retail floorspace, should the need be identified and if there were no other sequentially preferable sites available. 2. Aldermans Hill, Palmers Green, N13 4YD - Palmers Green centre boundary be extended to include the Morrisons store.
Core Strategy Preferred Options Illustrative Maps	Appendix 2	Mr Stuart Slatter (Planning Potential)	Planning Consultant Diocese of London	Whilst we agree with the 'Reasoned Justification' that in meeting this aim, there is a need for a green belt boundary review as part of the core strategy we do object to the identification of the boundary changes. Although the preferred boundaries identified in Appendix 2 are acknowledged as currently only being 'Preferred', the boundaries should be subject to a detailed assessment at the Core Strategy stage. By limiting the boundary review to the sites identified, this fails to assess the range of site proposals which could contribute to the delivery of housing within the Borough. The site proposal previously submitted by the Diocese in regards to Land at Enfield Road, Enfield, is one such site that would be prejudiced. It is therefore requested that the detailed boundaries of the Green Belt are again properly reviewed before the Submission Document is prepared, and that any site representations are fully considered as part of this examination.

Document Section	Section Number or Question	Name	Organisation	Response
Core Strategy Preferred Options Illustrative Maps	Appendix 2	Mr Will Thompson	Associate Director - Planning White Young Green	Whilst 'Map 2.2 Illustrative Map 1a' shows the Green Belt Boundary adjacent to Beech Hill as it is currently adopted as set out in the Enfield UDP, it is noted that paragraph 2.4 of Appendix 2 confirms that the representations submitted to the Issues and Options Report (including those submitted by Hadley Wood Golf Club) will be considered as part of the preparation of the Proposals Map which will accompany the final version of the Core Strategy. Hadley Wood Golf Club objects to the land use designation of the objection site (as defined in the current UDP) and recommends that the detailed Green Belt boundary be revised to exclude the land from the Green Belt. These representations [see attached for full details] will describe the objection site and surrounding area; relevant planning history including a previous attempt to alter the Green Belt boundary in this location; and relevant planning policy. An assessment of the suggested boundary amendment will then be provided, concluding that (i.) it would not cause harm to the purposes of including land in Enfield as Green Belt and that (ii.) the current Green Belt designation for the objection site is limited in its ability to fulfil the objectives of the use of Green Belt land and does not assist in meeting longer term strategic development needs in Enfield.
Core Strategy Preferred Options Illustrative Maps	Appendix 2	Miss Renee Goodwin (GVA Grimley Ltd)	Principal Planner La Salle Investment Management	Appendix 2: Maps 2.1 (Illustrative Overview of Enfield) and 2.8 (Illustrative Map 7a) Comments: It is noted that the site is included in the Strategic Employment Location land use designation. Proposed Changes: Amend map to include a note stating that the boundary of the Central Leaside SEL is subject to the managed release of unproductive or inefficient employment sites.
Core Strategy Preferred Options Illustrative Maps	Appendix 2	Duncan Bennett (CgMs Consulting)	Senior Associate Director Fairview New Homes Ltd	APPENDIX 2: CORE STRATEGY PREFERRED OPTIONS ILLUSTRATIVE MAPS Fairview New Homes strongly objects to the inclusion of illustrative maps within the Core Strategy. Section 3.4 of Creating Local Development Frameworks: A Companion Guide to PPS12 states that: - "Specific land allocations should not be set out in the Core Strategy. Instead, the Core Strategy should set out the broad locations for land use, which can be outlined in detail in site specific allocations in other development plan documents". Fairview New Homes therefore strongly opposes the inclusion of preferred options maps within the Core Strategy, even as illustrative material. These maps should be removed from the Core Strategy.
Core Strategy Preferred Options Illustrative Maps	Appendix 2	Mr Giles Dolphin	Planning Decisions Manager Greater London Authority	Comment: Detailed comments on the Proposals Map will be provided at the submission stage.
Introduction		Mr Mark Matthews	Thames Water Property	Ponders End Pumping Station and associated land (see attached plan 1) We consider this site, which is in 3 separate parts, should be removed from the Green Belt as the site does not meet the purposes of including land in the Green Belt and there are exceptional circumstances for removing the site from the Green Belt. Specifically, there are clear and defensible boundaries for all 3 parcels of land. In this context, because of the limited size, physical positioning and adjacent commercial buildings and operational infrastructure, the redevelopment of the site would not result in unrestricted urban sprawl or be detriment to any of the purposes of including

Document Section	Section Number or Question	Name	Organisation	Response
				<p>land in the Green Belt. The presence of these boundaries will also prevent a precedent from being set, thereby ensuring that the remainder of the Green Belt in the vicinity of the site can be endured. It is considered that there are exceptional circumstances for releasing the site from the Green Belt as redeveloping the site for commercial, employment and / or leisure use will play a fundamental part in transforming and improving the Ponders End Area of Opportunity.</p> <p>Land south of William Girling Reservoir (see attached plan 2) We also consider this site should be removed from the Green Belt. We consider this site should be removed from the Green Belt as the site does not meet the purposes of including land in the Green Belt and there are exceptional circumstances for removing the site from the Green Belt. Specifically, there are clear and defensible boundaries for the site. In this context, because of the sites layout, size, physical positioning and adjacent commercial buildings and operational infrastructure, the redevelopment of the site would not result in unrestricted urban sprawl or be detriment to any of the purposes of including land in the Green Belt. The presence of these boundaries will also prevent a precedent from being set, thereby ensuring that the remainder of the Green Belt in the vicinity of the site can be endured. It is considered that there are exceptional circumstances for releasing the site from the Green Belt as redeveloping the site for commercial, employment, leisure or a waste use can play a fundamental part in transforming and improving the Central Leaside Area, particularly the Angel Road area.</p>
Introduction		Mr Will Thompson	Associate Director - Planning White Young Green	Hadley Wood Golf Club is supportive in principle of paragraph 7.2.4 and paragraphs 2.3 & 2.4 of Appendix 2 of the Council's Core Strategy Preferred Options Report, which show that the Council agrees with the need to review the detailed Green Belt boundary, including land adjacent to Beech Hill. Hadley Wood Golf Club is also supportive in principle of the intentions of Core Policy 19 (Green Belt & Countryside), which states that the Council will continue to protect and enhance Enfield's Green Belt and Countryside and recommends that the Green Belt's detailed boundary is robust and defensible.
Glossary	Appendix 4	Mr Giles Dolphin	Planning Decisions Manager Greater London Authority	Comment: The London Plan (consolidated with alteration since 2004) now refers to Strategic Industrial Locations (SILs) rather than Strategic Employment Locations (SELs), therefore the new terminology should be used in the glossary and throughout the document.

Appendix J - Strategic Growth Areas Report: All written representations (in document order)

General Comments

British Waterways

Broadly agree with the approach set out in this report.

- Report should be cross referenced with the work that Urban Practitioners is doing to produce a planning framework for the Upper Lea Valley (on behalf of a partnership including LB Waltham Forest, LB Hackney, LV Park Authority and Design for London).
- BWB requests to be included in the Infrastructure Study, as an important infrastructure provider in the area, and added as a prospective delivery partner.
- The Council's Housing Market Assessment should also take account of the chronic shortage and demand for residential moorings.
- Waterways should be promoted as the heart of any place shaping transformation.
- Opportunities to promote freight by water in the redevelopment of the area, including construction materials and waste, are supported. BWB request that a feasibility study be carried out regarding the potential use of waterborne transport (TFL have commissioned Peter Brett Assoc to investigate the feasibility of freight by water in West London, which found that in certain circumstances there is a sound economic case for considered freight by water as an alternative to road transport).

Coal Authority, The

- No specific comments to make on this document at this stage.
- Interested in receiving future planning policy related documents.

English Heritage

- Previous comments have not been addressed.
- It appears that the Borough's heritage assets and wider historical environment have not been recognised despite Enfield's extensive work in understanding its historic environment (e.g. the draft Characterisation and Heritage Strategy 2008).
- Need to ensure that Enfield's own conservation staff are closely involved in the preparation of these documents.

Environment Agency

Main comments apply to all four areas, and cover:

1. Flood Risk

- Support for focus on exemplar development within the CL area, which will lead to the pioneering of new environmental technologies and approaches to reducing flood risk.
- Need to assess the impact of development on all sources of flooding, for all the AAPs, and cross reference the need for sustainable drainage techniques (SUDS).
- Need to mention how development planning by Local Authorities can contribute to improving quality of surface water – Enfield is a major contributor to the poor quality of the River Lee south of Tottenham Lock, caused by surface run off.
- Please ensure that the Sequential Test supports the preferred approaches in each AAP.

2. Biodiversity and Ecology

- All four AAPs need to make clear the need to assess and mitigate the impacts of development on biodiversity. Enfield contains many rivers and wildlife sites, which provide opportunities for enhancement.

3. Land Contamination

- All four AAPs need to make clear the need to assess the impacts of development on the groundwater as well as seeking opportunities to remediate contaminated land. Refer specific comments made on CL and NEE areas.

4. Water Efficiency

- Need to make clear in the text that the new housing proposed within the AAP areas will be water efficient.
- All residential development proposals will need to demonstrate that the proposal will comply with the water use target of 105 litres per person per day (London Plan policy 4A.16)
- Commercial development proposals need to demonstrate that the proposal incorporates water conservation measures.
- All proposals, submitted through planning, to refurbish and/or convert an existing building will need to demonstrate that water efficiency measures will be adopted within that building.

Fair Share Ponders End

- Need to see detailed plans before clarifying their position on the preferred approach.

Government Office for London (Chris Baker)

- The scale of growth in each location is clear, but seeks clarity about how the proposals for the four areas relate to a borough-wide strategy.

Greater London Authority

- The identification of Central Leaside, North East Enfield, Enfield Town and the North Circular Road as the focus for growth and change is generally supported. It reflects the broad approach being taken in the draft Opportunity Area Planning Framework.
- The section on the North Circular Road needs to accurately acknowledge the role of the TfL improvement scheme and the need to work closely with TfL as the major stakeholder in this area.
- Refer to the GLA responses to the individual Area Action Plans and Core Strategy Preferred Options for more detailed comments on each of the growth areas.

Haringey Teaching Primary Care Trust

- Supports and welcomes opportunities for employment.
- Considers that provision of health facilities in the neighbourhood centre will be important to bolster health infrastructure in this area and will complement ongoing improvements in health infrastructure in Haringey.
- Given the potential impact on health services in Haringey of, in particular, the North Circular proposed developments, NHS Haringey would be very keen to be involved in ongoing discussions and consultation around developing appropriate social infrastructure and ensuring that developments are able to play their full role in creating environments that promote health and well being in its broadest sense e.g. through relevant transport policies, green spaces and leisure, access to healthy foods etc.

- As there is no mention of increasing health facilities in the context of any developments in this area, considers this may have the effect of drawing Enfield residents from this area into Haringey along the Green Lanes corridor. It will be important for local PCTs to work with developers and LB Enfield to ensure health infrastructure in this area is sufficient to appropriately provide for these growing communities.

Highways Agency

- Pleased to note that their comments and recommendations submitted previously on the AAPs, have been referenced within the report.
- Pleased to note an evaluation of the transport impact to inform the Core Strategy and NEE AAP has been undertaken.
- Encourage emphasis on the provision and improvement of sustainable transport infrastructure, particularly where high trip developments (such as office blocks) are proposed.
- The Northern Gateway Access Package should not be relied on as part of the LDF scheme without a full assessment being conducted to demonstrate its deliverability. HA would recommended that reference to NGAP is worded accordingly in any forthcoming documents:

*“Continued consideration will also be given to the **potential merits, benefits and impacts** of a Northern Gateway Access Package to improve accessibility and movement within North East Enfield. This will be considered **alongside alternatives** in the context of forthcoming area-based studies being undertaken in partnership with stakeholders including Transport for London and the Highways Agency”.*

- Enfield’s forthcoming Development Management DPD document should outline the need for transport assessments and travel plans to help assess and mitigate the transport impacts, and establish parking standards in line with those set out in Annex 4 of the London Plan.
- HA welcomes the opportunity to comment on forthcoming masterplans for the for placeshaping areas.

Jehovah’s Witness (Mr Raymond Deakin)

- Supports the regeneration of east Enfield area, particularly the north east of the Borough, and the innovative and attractive ideas being proposed.
- Recommends that the need for places of worship is mentioned throughout the document, as based on his personal experience, these are difficult to find/obtain.
- Given that Enfield is a multi-cultural Borough, particularly in the north east area; there is a need for a variety of places of worship, which will increase with any new housing developments proposed.

London Borough of Haringey

In General

- Two of the proposed growth areas, CL and NC, are adjacent to the Haringey Borough Boundary intensification of uses should take into account the infrastructure needs of local communities, including the neighbouring Borough’s communities.
- Concerned about the potential loss of Strategic Employment Land and Preferred Industrial Area.
- Need rigorous assessment of environmental and transport impacts and flood risk.

Connectivity

- Central Leaside and North Circ growth areas (CL & NC) are dissected by transport networks, need safe and good quality pedestrian and cycle links.
- Growth area options should emphasise sustainable transport options.
- Need reference to the development of an Access Strategy, accompanied by public realm improvements and enhancements to the environment.

Central Leaside incl. Meridian Water

- Final housing numbers would be subject to capacity studies.
- LBH oppose proposed location of housing in and around IKEA and Tesco, on the grounds that it will compromise the integrity of the Strategic Industrial Land in the Upper Lee Valley corridor.
- Supports the location of new mixed-use development on land to the west side of the West Anglia Rail Line and east of the River Lee Navigation (existing location of the Harbet Road Industrial Estate) to better link with existing residential communities to the east and provide waterfront development opportunities.
- Angel Road station proposals need to take Northumberland Park station in account.
- Oppose retail development at CL, beyond neighbourhood/local centre option.
- Concerned about potential loss of Preferred Industrial Area.

The North Circ area around Bounds Green and New Southgate

- NCAAP should take into account implications for LB Haringey's community, social and educational infrastructure – seeks to discuss Bowes Road Primary School with LB Enfield.
- Need to promote sustainable transport options and assess transport impacts on Haringey from NC area.
- Considers there is an open space deficiency in the NC area located in Enfield, which LB Enfield needs to address.
- Supports the creation of a green link through the Enfield Gateway site (Western Gateway) to Telford Road Ecological Corridor.
- Requests further detail on Western Gateway site proposals.

North East Enfield incl. Ponders End

- Oppose allocation of housing in industrial zone between railway and reservoirs.
- Concerned about potential loss of Preferred Industrial Area.
- Traffic implications on LBH – request to be kept informed of outcomes of further work, including the Northern Gateway Access Package (NGAP).
- Interested in research into water based transport.

Legal and General (represented by Savills, and incorporating the views of National Grid, represented by Montagu Evans)

- Broadly supports the report - refer NC section for further comments.

National Grid Property Holdings (represented by First Plan)

- Clarified NGPH position on proposals for CL & NEE – refer following sections.
- It is essential that the Core Strategy establishes how masterplans will integrate with the AAPs, and how it will be incorporated into the LDF - how it will fit into the decision making process, will be a DPD and subject to full public scrutiny, or merely comprise an SPD?
 - NGPH considers that the Ponders End masterplan should be brought forward under the auspices of the AAP, and therefore subject to public scrutiny, or at the very least as an SPD, in accordance with PPS12 (Councils should not produce planning guidance other than an SPD, where the guidance is to be used in decision making or the coordination of development – para 6.4).

- Asserts that the Core Strategy should concern itself only with setting out the strategic policy objectives for the AAP/masterplan area and should avoid setting out any detailed objectives such as road layout etc.

Natural England

- No detailed comments to make in relation to the four strategic growth areas.
- The development of each area should be underpinned by a well-planned, well-designed green infrastructure – this should be a key component of the overall infrastructure to be provided in Enfield and explicitly addressed both in the Enfield Core Strategy and in each of the Growth Area AAPs.
- Need reference within the report to the need to protect and enhance biodiversity in the four growth areas – particularly as much of Enfield lies within one of the GLA's Areas of Deficiency in access to nature (defined as built-up areas more than one kilometre actual walking distance from an accessible Metropolitan or borough site).
- Recommend that those officers involved in the production of the Core Strategy and AAPs comment on, and use the emerging findings of the forthcoming Upper Lea Valley Landscape Strategy (by Witherford Watson Mann Architects) to inform the plans.

North London Waste Authority

- Specific comments made regarding CL and NEE – see following text.

O Bay Community Trust / BME ESP Board Representative

- Action should be taken to facilitate a bespoke programme to meet the needs of the growing Enfield Black and Minority Ethnic (BAME) communities – *refer response for further details of initiatives proposed by ESP*
- Supports the Council's proposals to work with partners to improve public transport, to enhance conditions for walkers and cyclists, and encourage the development of travel plans for schools, workplaces and residential areas.
- Measures should be taken to create the conditions for more sustainable transport throughout the Borough (including traffic calming, speed restrictions, and increased provision of dedicated cycle routes), which will help achieve wider Borough objectives such as addressing noise, air pollution and health issues.

The Ramblers - Hertfordshire and N Middx' Area (formerly known as the Ramblers Association)

- Support the inclusion of the following policies, if these are not already covered in the Core Strategy:
- For major redevelopments, support the provision for pedestrians, by ensuring:
 - Safe, direct and convenient pedestrian routes within the site.
 - Contributions to improving pedestrian routes to the development site;
 - Links to the existing pedestrian network.
 - Underpasses, bridges or other appropriate means of crossing primary, secondary or local distributor roads within or adjacent to the site.
 - Adequate landscaping and lighting for pedestrian routes both within the development and on any new external links provided as part of the development.
 - New road schemes or road improvements to be required to take account of the needs and safety requirements of pedestrians.
- Support and encourage access to the countryside by:
 - Encouraging proposals to improve and extend footpath, cycleway and bridleway access to the countryside, where consideration is given to

- minimising the potential for trespass and vandalism on agricultural businesses.
- Requiring new developments on the periphery of the town to make provision for the improvement to and extension of the footpath, cycleway and bridleway network both through the site and into the countryside.
- Improve the public transport network to enable residents to have good access and make best use of the wider countryside for their recreation and health.
- To protect the countryside:
 - Require development proposals, which are liable to reduce or damage the character, quality or accessibility to the countryside to incorporate measures to minimise any adverse affects on landscape, wildlife and informal recreation interests.
 - Use planning obligation to secure the implementation of mitigation measures within and around the development which maintain and enhance the character of the countryside.

SEGRO Plc (represented by Tribal MJP)

[One of Europe's largest industrial/warehouse development companies and has an interest in: land at Advent Way, Edmonton (around 3 ha of industrial/warehouse premises) and land at Morson Road, Ponders End (around 5.4 ha of industrial premises and carparking within the Meridian Business Park, adjacent to the River Lee Navigation channel)]

- Supports the identification of the four priority areas for growth and regeneration, the attraction of investment, and the enhancement of the environment as part of the Core Strategy.

Sita UK

(SITA UK is a recycling and waste management company, generating environmental value, social value and economic value from Britain's waste. Its focus is on delivering environmentally responsible and increasingly innovative solutions for the public, local government, industry and commerce, enabling its customers to reduce their impact on the environment)

- Agree that new developments should be encouraged to use Combined Heat and Power (CHP) or renewable energy sources.
- Support the aspirations for the waterways - has the Council considered the potential for sustainable forms of transport for commercial/industrial/waste movements?

Thames Water

- Reiterates that development should be located in areas where utility infrastructure capacity exists or can be provided ahead of development.
- Where additional infrastructure is required to serve the development it is vital that this is in place ahead of occupation if low/no water pressure and internal/external flooding of the property is to be avoided.

Tottenham Hotspur Football Club (represented by Savills)

- Supports in principle the regeneration and growth in North Tottenham and the surrounding area, both in LB Enfield and LB Haringey.

Transport for London

[These comments represent an officer level view from Transport for London 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 this document. These comments also do not necessarily represent the views of the Greater London Authority.]

Recommends that the following be incorporated into the report, in order to ensure that all development and any area planning takes into account how to manage transport within and across each growth area (refer to response for further detail):

- Ensure that smarter travel initiatives are at the heart of any growth.
- A commitment to travel plans (in accordance with TfL guidelines).
- A requirement for transport assessments for major development proposals.
- Undertake an assessment on the expected (bus) trip rates generated by the amount of growth proposed.
- Promote walking and cycling in more detail.
- Maximise more sustainable modes of transport, including walking, cycling and public transport, alongside a restraint based approach to car parking, in order to ensure development is sustainable as possible.
- Mention that maximum car parking standards in line with the London Plan will be adhered to and more sustainable modes will be promoted in all four growth areas.

Considers that Enfield's development strategy should be based on a strong evidence base, with an operational assessment of conditions on all transport modes. The growth should consider phasing. Whilst it is recognised that this should form part of the evidence base, references to this work should also appear in this document.

Sarah Collingbourne

Objects to the plans until more information about how the plans will affect local residents in the area are looked into. There is no information about how your plans will affect residents who currently live in the growth area and how the plans will increase noise, parking issues etc within the area. None of the images map out where the main impacts will be.

Joshi Kishorkumar

- Supports there is a need for change and that it is important to carry on these changes into the future. Only Enfield Town has been modernised, the rest of the Borough is lacking.
- Considers the timeframe of 2026 is a long time away, but this will do as there will be lots of changes by then.
- Considers that the place shaping areas have declined in the last 18 months and will continue to decline if something drastic, like the project described in the report, is not done.
- Notes that there have been delays in getting these projects started.
- Notes the projects planned are large in scale, but is confident the Council can overcome any problems relating to this.

Diane Jenner

Encourages the development of a plan to divert traffic from entering the Borough, through the provision of out of town parking sites with regular transport links to hospitals, parks, industry and universities etc – this would reduce the volume of traffic coming into the Borough, reduce the impact on parking for local residents and make life easier for people parking when visiting hospitals, places of work, universities, parks and shopping centres etc.

Anthony (Tony) Penrose

- Opposes the provision of homes, jobs, roads, retail outlets, public services and leisure activities on land presently designated as industrial or residential?
- Questions why the Council is proposing to build new houses on industrial land in London there are an estimated 3,000,000 empty houses in England.
- Is surprised that work is continuing on these projects at all given the severity of recent global events. Would have thought that the original planning remit would have had to be changed fundamentally.
- Understands that at this stage there can be no detail applied to the plan, but fears the design strategy itself is flawed.
- The total number of houses or homes proposed in the plans is 8600 and the predicted number of jobs proposed in the plans is 1500. Questions how this disparity will help the 8 percent presently unemployed in the area, or reduce the use of transport in any of its present polluting forms.
- Notes that *houses* are built in Enfield town but *homes* are only ever built in the other areas.
- Questions the definition of the proposed “Landmark Building” in Enfield Town.
- Assumes gas holders are to be removed given the proposed developments on these sites.
- Report should define ‘affordable homes’
- Supports housing on waterside edges provided that they were designed appropriately, they should enhance the use of the waterway, be environmentally friendly, car parking space should be within the building footprint, they should not be tower blocks and have garden roofs as suggested in the Royal Commissions Report on Urban Environment. Recognises these buildings would be more expensive to build.
- Report suggests that there is strong growth in service sector jobs – questions whether this is likely to continue in a recession. Jobs in retailing are now seldom additional they usually mean jobs are lost in the company outlets in other areas that are now deemed to be unprofitable. Need jobs that make London and the Country more self sufficient, there is very little left to trade except tourism.
- Given growing trends towards Internet shopping, warehouses will be needed but more expensive retail outlets for personal shopping will surely decline.
- Roads in the Eastern and Southern wards are at present are extremely congested. Supports new links or roads that reduce the traffic congestion provided that these reduce noise and fumes for those that live near to them. In the past this has not happened in the past and new links should improve the local environment for residents, not make it worse.
- For more than thirty years the residents along the A406 have had to endure pollution levels that would not be tolerated in other countries. The present plan for the Bowes Road section will not solve the congestion or pollution problems. A twin tunnel, carrying the trunk road traffic on the A406, starting before Green Lanes and emerging in Pinkham Way would solve the problem and could have been largely paid for by the sale of the 440 houses and land already in TfL ownership. A tunnel many times longer was built in 2005 to avoid a road spoiling a Paris beauty spot.
- Agrees that the areas are amongst the most deprived areas of London and the correct type of development is long overdue. Questions, however, whether is ever sensible and right to build houses and retail outlets on industrial land.

“I believe that the charade of claiming that public consultation has approved schemes such as this one is misleading and dishonest. I know that we live in a capitalist society and therefore business

interests must be protected and enhanced but I doubt that the respondents to the questions asked in the Central Leaside Area Action Plan answered in a way that is beneficial to the nation, but rather responded to further their own vested interests.”

- Believes that inappropriate Government Regulation, corporate and personal vested interests led to the near collapse of the banking industry, those failed parts of the system have had to be saved by part nationalisation and that financial burden has fallen disproportionately on the poorest in society. Supports a nationally owned construction and development sector to ensure they operate to fulfil national needs and they can not than manipulate the systems, with others, to generate the conditions that insure their own future profits.

SPECIFIC COMMENTS BY PRIORITY AREA

Meridian Water/Central Leaside

BWB

- Broad agreement for approach
- The River Lee Navigation should be the heart of transformation at CL – the ‘spine’. This would require significant third party funding and other initiatives. (A shuttle service between IKEA and Tottenham Hale has been explored by BWB).
- The mix of housing types should include residential moorings
- BWB request to be consulted on masterplan for Meridian Water and involved in flood risk assessment of the area.

English Heritage

Proposals for CL do not appear to identify or value the historic environment, and does not consider how the area has developed and its contribution to the character of the area. For example, much of the Lee Valley is of archaeological value – its heritage value should be carefully considered and utilised where possible to inform future change.

Environment Agency

- Area includes some inner source protection zones (SPZ), the use of deep piled foundations or ground source heat pumps may provide migration paths allowing shallow contamination to enter the deep chalk aquifer.
- As a considerable amount of landfilling has taken place along the eastern banks of the River Lee – suitable investigation/remediation actions will need to be taken for all redevelopment in the area to protect groundwater and surface waters.

Government Office for London (Chris Baker)

Expressed slight concern about the Central Leaside AAP for which they understand there is some uncertainty, not least in respect of the NL Waste Authority's proposals. GOL has advised Haringey that this needs to be resolved before they proceed further with their Core Strategy if it is to mention the AAP; and the same would apply to Enfield. Clearly, the proposals for CL are a major issue for both Boroughs' overall strategies and there needs to be some clarification in order to be sure of avoiding problems with the Core Strategy examination. GOL are happy to discuss this further.

La Salle Investment Management (represented by GVA Grimey) [Freehold owner of Stonehill Business Park in Central Leaside]

- Supports the designation of the CL growth area and agree that a mix of uses should be encouraged in this area.
- Supports improving accessibility to and across the area, and proposals to overcome the severance caused by Angel Road and east-west links to the LVRP

are supported – considers these improvements are key to releasing the benefits of the area.

Recommends that the following comments be considered in the preparation of any forthcoming guidance:

- Deliverability and Vision
 - The AAP and masterplan should set out a framework for delivery, including the key objectives and regeneration principles, but should not designate specific areas for specific uses, as much of this will depend on market conditions and timing overall.
 - The AAP and masterplan should also include priorities for delivery, and set out broad time horizons and details of how the proposed social infrastructure (new schools, health services etc) will be funded.
 - Where proposed to secure funding through s106 contributions, the contributions requested should relate in scale and kind to the proposal and must have regard to viability.

- Distribution and Land Uses
 - Supports a mix of land uses in the area to the south of Angel Road, but object to a prescriptive approach which designates sites for specific uses, in the absence of a commercial context.
 - Supports the upgrading and intensification of employment uses alongside the western fringe of Harbet Road, but consider that other uses also be considered appropriate, particularly where these would promote employment generating uses. It is considered that the area is appropriate for a mix of uses.
 - Recommends that the Council encourage high density, potentially higher value uses, such as retail, which could help cross fund required social and transport infrastructure and act as a catalyst for upgrading the existing employment accommodation.
 - Supports four tracking proposals and refurbishing Angel Road Station, to encourage the development of a vibrant local centre.

- Infrastructure Requirements
 - Supports the aspiration to improve the accessibility of CL.
 - Supports proposals to upgrade Angel Road Station, provided details of how the Council intends to deliver the new facilities are included and tested.
 - Supports proposals to improve pedestrian accessibility across the site, and recommends that this is most effectively achieved if mixed use developments comprising of active frontages are proposed along pedestrian routes.

- Design
 - Supports higher density development in appropriate locations, using a design-led approach, to allow elements of the built and natural environment to determine best location e.g. areas easily accessible by public transport.
 - The AAP and masterplan should recognise the opportunity to increase the density along thoroughfares and in other locations where appropriate.

London Borough of Haringey

- Final housing numbers would be subject to capacity studies.
- Opposes proposed location of housing in and around IKEA and Tesco, on the grounds that it will compromise the integrity of the Strategic Industrial Land in the Upper Lee Valley corridor.
- Supports the location of new mixed-use development on land to the west side of the West Anglia Rail Line and east of the River Lee Navigation (existing location of the Harbet Road Industrial Estate) to better link with existing residential communities to the east and provide waterfront development opportunities.
- Angel Road station proposals need to take Northumberland Park station in account.
- Opposes retail development at CL, beyond neighbourhood/local centre option.
- Concerned about potential loss of Preferred Industrial Area.

National Grid Property Holdings (represented by First Plan)

- Do not necessarily disagree with representations put forward from Dwyer regarding land in CL owned by NGPH, but would like it noted that Dwyer reps should not be taken in any way to represent the view of NGPH.
- Would like to clarify its previous response to the CL Issues and Options report, and request to have any summary amended to read:
“Both scenarios identify National Grid land at Willoughby Lane as appropriate for residential-led mixed development and, subject to comments in relation to question 4 above, this is considered appropriate given the site constraints affecting the site.”
- Any summary of NGPH's response to previous consultation should emphasise the importance to NGPH of securing the early removal of the operational gas holders at Willoughby Lane (Kimberley Road) and Leaside Road, and confirmation of that the site would be most appropriately released predominantly or exclusively for residential development.

In summary, whilst the Preferred Approach to the Central Leaside Area including Meridian Water is broadly supported there are a number of objections raised and as a result amendments required as follows:

- i) The preferred approach should include explicit reference to the fact that a key priority within the Meridian Water area will be to secure the early removal of the operational gas holders at Willoughby Lane (Kimberley Road) and Leaside Road. This site can and should be delivered in advance of wider redevelopment proposals which are much more longer term.
- ii) The Core Strategy should concern itself only with setting out the strategic policy objectives for the AAP / masterplan area and should avoid setting out any detailed objectives such as road layout and orientation for example.
- iii) The Core Strategy should clarify that the boundary for the Meridian Water masterplan area is indicative. The masterplan boundary should rightly be determined and set through the AAP.
- iv) The Core Strategy should establish clearly what role the masterplan will have, what status it will hold and how it will be incorporated into the Local Development Framework. Clarification should also be provided in respect of timings for production of the document.
- v) Full details of the masterplan for the Meridian Water area should be brought forward under the Area Action Plan which will be subject to public scrutiny and will be a statutory document forming part of a DPD.
- vi) At the very least, the masterplan document should comprise an SPD, to accord with the requirements of PPS12 which advises that Councils should not produce planning guidance other than SPD where the guidance is to be used in decision making or the coordination of development.

Suggested rewording to the 4th para of the preferred approach to the CL area including MW:

“Change at this scale at the core of Central Leaside, provides an opportunity for development of exemplar quality, pioneering new environmental technologies and approaches to reducing flood risk. Opportunities will be explored for higher density development close to Angel Road station to take advantage of future improvements to rail services. **A key priority will be to secure the early removal of the operational gas holders at Willoughby Lane (Kimberley Road) and Leaside Road.** Providing strong pedestrian connections across the area and safe, welcoming access to the nearby Lee Valley Regional Park is also a priority.’

North London Waste Authority

- Presents its argument for a waste facility at Argon Road, Central Leaside (Former BOC Site).
- Identifies the proposed development at Meridian Water, and subsequent release of land off Argon Road for mixed-use development, as being inconsistent with Enfield’s Employment Land Study (Halcrow, 2006).
- Objects to the omission, with no reason given, of text in CL Issues and Options report, which identified the area around Angel Road as a key area of search for new waste facilities.

SEGRO Plc (represented by Tribal MJP)

- Supports the identification of CL as a priority area, with major opportunities for change and investment.
- Supports the promotion of mixed use and intensive development on specific sites but objects that this be restricted to a focus on land to the south of the North Circ – the potential for increased flexibility of use of land to the north of the North Circ, particularly those sites adjacent to the strategic road network, should also be investigated.
- Supports greater flexibility of uses on existing employment sites in accordance with the needs to diversify the economy and encourage enterprise, thereby enhancing employment opportunities for local people.
- Supports greater flexibility and the promotion of mixed uses to enable *sui generis* uses and vehicle-related operations to be located with the North Circ road corridor to attract investment and enhance vitality and viability of the area, and enhance employment opportunities for local people.

Sita UK

(SITA UK is a recycling and waste management company, generating environmental value, social value and economic value from Britain’s waste. Its focus is on delivering environmentally responsible and increasingly innovative solutions for the public, local government, industry and commerce, enabling its customers to reduce their impact on the environment)

- Supports the recognition that CL contains some key public facilities, which provide essential services to North London, including the Edmonton Eco Park, and that the area will continue to play a key role in the management of North London’s waste.
- Considers that the designation of the Edmonton Eco Park should reflect the existing facilities and be consistent with the North London Waste Plan.

- Considers any proposed non-waste developments should consider any existing waste management facilities, and sites allocated for waste management, to ensure that they are not prejudiced (in accordance with PPS10, para 33).
- Supports that new developments should be encouraged to use Combined Heat and Power (CHP) or renewable energy sources.
- Supports the aspirations for the waterways - has the Council considered the potential for sustainable forms of transport for commercial/industrial/waste movements?

Thames Water

Notes that the CL area is in relatively close proximity to TW's Deephams Sewage Treatment works, and it is preferred that B1(c), B2 or B8 (employment related uses) are suitable in close proximity to the sewage works. Research has shown that existing communities react to an average of a '2 odour unit threshold' – the CL area would be subject to annoyance in excess of 2 odour units.

Tottenham Hotspur Football Club (represented by Savills)

- Recognises the potential of the Central Leaside area to accommodate significant new development for housing and employment, and that development in the area can contribute to securing the strategic regeneration aims of central government and the Mayor of London in the longer term.
- Council needs to be explicit about the scale and size of the new centre at CL so that its relationship to other centres and facilities in the surrounding area is clear (it would seem that the Council's intention is to provide only for the day to day needs of the proposed new community at MW)
- Considers that planning for the development of significant additional retail floorspace in this currently out-of-centre location would require assessment against the principles and approach set out in PPS6.
- Considers that clear guidance will be required in the AAP, in due course, for the preparation of detailed facilities for the new centre.

Transport for London

- Considers that while detailed transport analysis cannot form part of this type of document, some demonstration that the transport evidence has been used in the assumptions for levels of development required is necessary.
- Considers there should be a clear indication of how the improvements will be funded, rather than a reference to the fact that 'new' development will help to cross-fund improvements to transport and social infrastructure (does not meet the requirements of PPS12).
- Objects to the premature assumption, or basing of a development scenario, around future improvements to rail services at Angel Road station, without consideration of alternatives.
- Considers contingency planning needs to be incorporated, which may lead to a reduction in the level of growth that can be achieved.
- This area is largely accessed from the A406 North Circular, which forms part of the Transport for London Road Network (TLRN). An impact assessment to the TLRN should be incorporated into the evidence base. Any required changes to significant roads should be documented with information on how those infrastructure changes will be realised. It is vital that development in the area does not affect the safe operation of the TLRN.
- Traffic management measures can have an impact on the reliability of buses and detailed proposals should be developed in collaboration with the TfL Bus Priority Team to ensure that the proposals do not negatively affect bus services.

- Encourage emphasis to be placed regarding the potential freight transport using the River Lee Navigation for the movement of material into and out of the area, particularly waste, which would remove HGV vehicles from the surrounding road network (supports policies 4C.8 Freight uses on the Blue Ribbon Network and 4A.22 waste management of the London Plan).

Joshi Kishorkumar

- Considers the proposals for the **CL and Meridian Water** area are a very good start.
- Supports an increase in businesses in the CL/Meridian Water area, as some of the local businesses and residents around the area may benefit as well. Most of us have to rely on distant suppliers or manufacturers.
- Considers that the prospect of local housing will bring people to live and hence, bring business into the local area. A lot of businesses have disappeared from the area – it looks ugly and needs change.

Enfield Town Rail Station area / Enfield Town

English Heritage

- Supports the Council's commitment to protect Enfield Town's heritage assets and market town character.
- Encourage the development of a comprehensive masterplan based on a sound understanding of the historic development of the Town, and its heritage value, by recognising and valuing both designated and non-designated assets, their settings, their relationship with each other (as individuals and a collective)
- Supports the Council's approach to pay due regard to the character and setting of the conservation area, when introducing major change to the Enfield Town Station area.
- Recommends that a detailed analysis of the historic development of the area, its contextual qualities and heritage value should be undertaken as part of any future masterplan for the area.

Lionsgate Properties (represented by Planning Works Ltd.)

- Supports general direction and scope is supported *but considers that scale and complexity of proposals should not inhibit individual proposals which can aid regeneration.*
- Supports the continued focus for future development within the town centre around Enfield Town Station.
- Considers that any policy aspiration to resist the loss of existing offices within Enfield Town, unless re-provided elsewhere, is not regarded as a viable policy direction.
- Considers that the scale of the proposals for the area around Enfield Town Station is significant, and therefore the complexity of these proposals must therefore be assessed against the impact that this will have on deliverability and timescales. The approach should be flexible enough to recognise and promote individual proposals within the area, therefore allowing catalyst development to help aid the overall renewal process.

Royal Mail Group (represented by Atis Real)

- As stated at the Enfield Town (Stage 3) Design Workshop on 16 October 2008, Royal Mail considers that the Enfield Delivery Office forms an important part of its operational network and there are no plans to relocate this viable operation at this time.

- Supports the production of a detailed master plan where in-depth consideration is given to the compatibility of existing and future uses.
- Requests the Council continue to engage with Royal Mail throughout this process.
- Supports the Council's objectives to promote growth and regeneration in the Enfield Town Station area, but would resist plans to relocate without the provision of an appropriately worded re-provision policy.
- Encourages the Council to consider the compatibility of future neighbouring with the existing Enfield Delivery Office.
- Supports, in principle, measures to improve the existing public transport interchange and improve accessibility in and around the Town Centre.

Southgate District Civic Trust

- Agrees with the Council's preferred approach, but look forward to more specific plans as these unfold in the fullness of time.
- Supports the Council's aspirations to retain the tradition and historical character of the Town.

Theatres Trust

In regard to development proposals for the evening and night-time economy:

- Encourages proposals for a performance space in Enfield Town, which would relate to the two other existing performance spaces in the Borough.
- Supports Enfield town centre would be the obvious destination for a 'higher quality' cultural venue that would make a substantial contribution to the evening economy.
- Supports a mix of retail, leisure, offices, arts, culture, tourism and entertainment facilities in the main town centre will help deliver sustainable development by promoting economic growth, improving accessibility and offering genuine choice for consumers (the word 'leisure' should not only imply sporting activities).

Transport for London

- Considers an impact assessment will be required forming part of the evidence base for the anticipated levels of growth as much of the road network in the town centre (Southbury Road, The Town, London Road, Cecil Road, Church Street and Windmill Hill) is a part of the Strategic Road Network. It needs to be ensured that any development will not have an unacceptable impact on these roads, including any adverse impacts on buses.
- Recognises the potential benefits of a new and improved transport interchange at Enfield Town Station, however, the complete removal of the bus stands at Little Park Gardens will reduce the penetration of bus services into the town centre. This has business case implications in terms of bus patronage and bus operations since it may mean longer out of service bus workings and buses may be affected by congestion in the eastern part of the town. TfL would require detailed discussions on this issue.
- Objects to the relocation of the bus stands unless a new facility that is the equivalent or higher in capacity or better in location, has been agreed with London Buses and has been delivered. London Buses currently run 3 routes which terminate and use the bus stands at Little Park Gardens.
- The proposed link road would need to adhere to policy 3C.16 of the London Plan which requires development plan documents to incorporate the criteria in the policy for assessing road schemes. In particular, it has not been demonstrated in this document that the link road would improve safety for all users, or improve conditions for pedestrians, cyclists, disabled people, public transport, and freight.

It is unclear if buses are expected to use the link road, or if there will be any changes for pedestrian routes from Church Street and Cecil road to the eastern area.

- It is unclear if the repositioning or redevelopment of Enfield Town station will occur within the lifetime of the plan. This should be clarified and contingencies developed if there is not a reasonable prospect of provision.

New Southgate / North Circular

English Heritage

- Considers that more recognition needs to be given to the area's wider historic environment e.g. Bowes Road Library (Grade II listed building).
- Supports that Southgate Town Hall has been recognised as an important local building.

Greater London Authority

- The section on the North Circular Road needs to accurately acknowledge the role of the TfL improvement scheme and the need to work closely with TfL as the major stakeholder in this area.

Legal and General (represented by Savills, and incorporating the views of National Grid, represented by Montagu Evans)

- Seeks to ensure that other appropriate uses are considered for the Western Gateway site and emphasises the need for a viable and deliverable form of development.
- Has provided input to the forthcoming brief to Council consultants for the masterplanning of the wider area (including the Western Gateway site).
- Confirms the interest of Legal and General and National Grid in pursuing mixed use development on the Western Gateway site - however as the site is currently occupied by relatively valuable retail uses and an operation gas holder, any development opportunity will only arise if planning permission is granted for uses of sufficient value to displace those currently onsite (and in regard to the gas holder, removal and remediation).
- Considers that close working between the landowners and Council is required.
- Supports the focus of growth and regeneration towards the area around the North Circular Road at Bounds Green and agrees with the Council's preferred approach subject to the comments below.
- Awaits confirmation via the forthcoming housing market assessment that the Council's preference for family sized homes is properly justified and recommend the following addition to the report (page 18, end of paragraph 2):

"The mix of residential development (including the number of 'family' units) will be subject to market testing at the time of submission of the relevant planning application. Scheme viability will also be a determinant of mix."

- Considers that there is a sound qualitative argument for new retail development (including food retail), which would provide local facilities for residents and reduce the need to travel.
- Supports the addition of a hotel to add to the vitality and mix of uses on the site.
- Suggests amendment to 'New Southgate' para 1, page 19 to read:

“...and consideration will be given to mixed use development including residential, retail (including food), hotel and business uses to ensure that this previously developed site makes a positive contribution to the regeneration of the wider area.”

- Considers that while the need for comprehensive masterplanning (and integration with the redevelopment of Ladderswood) is accepted, this should not prejudice the early redevelopment of the Western Gateway within that wider masterplan.

LB Barnet

- Notes that the 2,000 proposed new homes in the North Circular area will have an impact on the neighbouring Borough of Barnet, and it is important that both Councils work together in partnership to address the social, community and physical infrastructure implications of this housing growth.
- Acknowledges that further detailed work is to be undertaken by Enfield on the type, amount and location of the new homes.
- Notes the reference to more detailed work proposed in the New Southgate area, including improvements around New Southgate station. The land above, and to the north of the entrance to New Southgate station is a Barnet UDP proposal (H19) for a mixed use scheme. Barnet will want to work in partnership with Enfield in redevelopment in New Southgate including bringing forward the aforementioned land forward for development and improving access to New Southgate station.

London Borough of Haringey

- NCAAP should take into account implications for LB Haringey's community, social and educational infrastructure – seeks to discuss Bowes Road Primary School with LB Enfield.
- Need to promote sustainable transport options and assess transport impacts on Haringey from NC area.
- Considers there is an open space deficiency in the NC area located in Enfield, which LB Enfield needs to address.
- Supports the creation of a green link through the Enfield Gateway site (Western Gateway) to Telford Road Ecological Corridor.
- Requests further detail on Western Gateway site proposals.

Southgate District Civic Trust

- Agrees with the Council's preferred approach, but looks forward to more specific plans as these unfold in the fullness of time.
- Questions how much of the Ladderswood estate is likely to be demolished and encourage that any rebuilding be of high architectural and energy saving standards.
- Recommends that emphasis should be placed on reducing traffic levels entering and passing through the development zone, curtailing the number of car commuters using Arnos Grove and New Southgate stations that monopolise car parks and local streets, and improving bus connections to the stations. This will make life more pleasant for local residents, in addition to the reduction in pollution and carbon emissions.

Transport for London

- Welcomes the commitment to ensure that any new development in the area will not prejudice the possibility of future junction improvements. TfL's safety and environment scheme for the A406 provides a way forward for some of this area,

without ruling out an 'intermediate' scheme of additional traffic capacity at some stage in the future.

- Considers an impact assessment is required in support of the growth in this area which should form part of the evidence base, to ensure that development in the area does not affect the safe operation of the North Circular or bus journey times.

Mr B Kestelman

- Supports the mention of New Southgate Millennium Green as a focus for the new Ladderswood Estate development. As Millennium Green is a charity-run and financed open space, any developers, both of the new housing and new industrial uses, should be required to support the trust, which runs the Millennium Green.
- In regard to the need for the equivalent of a new primary school (page 18):
 - In the case of Springfield Road Primary School, opposes the building of further school premises on the existing school playing field to the east of the school, or on the existing amenity green space to the west of the school, as there is insufficient open space for the community of this area.
 - If the school is to expand, consultation with the local community would need to be carried out on the possibility of rebuilding the school with two storeys.
 - In the case of Broomfield School, and the possibility of a new combined primary/secondary school, as well as primary school elsewhere in the immediate area - careful consideration will need to be given to safe walking and cycling access between the new housing and the school, to minimise the number of parents driving their children to school. This has negative effects including loss to the children for exercise opportunities, and road safety/crossing skills, pollution from vehicles and waste of parental time and fuel.
- Need to mention the need for additional secondary school facilities, given the NCAAP Preferred Options report made reference to not building on the playing fields at Broomfield School, which is at capacity now.
- Proposed 'landmark architecture' at New Southgate needs to keep in with the surrounding housing and employment structures, rather than being a grandiose gesture.
- Opposes Palmers Road being connected to Lower Park Road, as this will cause Palmers Road to become more of a rat-run than it is already.
- Need to ensure that the Council's proposals for the area coordinate with the surface rail services at New Southgate station, and the underground rail services at Arnos Grove, as transport links for new employment and residential developments in this area are essential.

Joshi Kishorkumar

- Considers that it is over 37 years since anything was done to the North Circular (N13) Bounds Green and New Southgate.
- Questions how long it will be before the project starts, as everywhere else seems to be changing.

Ponders End / North East Enfield

British Waterways

- Broad agreement for approach - please also refer to comments made on NEE AAP Preferred Options.
- Columbia Wharf needs defining and should be more than an interesting focal point – it should be integral to place shaping.

- Keen to be involved in strategies to improve accessibility, such as the NGAP.

English Heritage

- Objects to the limited recognition given to the historic importance of the nearby flour mill.
- Need to be more explicit about the 'listed' Broadbent Building on the Mdx Uni site - which requires careful management in the face of change and the other sites of heritage value such as Enfield Lock, Enfield Island Village (Royal Ordnance) and the King George Pumping House, further south.

Environment Agency

- Both groundwater and surface water protection should be incorporated into any specific development proposals in the area. As with CL, this area has a long industrial history including landfilling activity. There is an inner source protection zone in the Ponders End area and North West of Brimsdown.

Fair Share Ponders End

- The key route through PE (Hertford Road) needs to be expanded and opened, by improving traffic flow. It is clogged with traffic during much of the day, causing noise and pollution for the surrounding areas.
- Considers the area is imbalanced in terms of green space and residential and commercial use. Green space is needed in the south west section of Ponders End placeshaping area, and opportunities exist for more open space at the Mdx Uni site.
- Supports more use and visibility of the river. The Council could encourage businesses to be moved closer to the A10, transforming the land along the river for residential and recreational purposes.
- Plan needs to mention creating community facilities e.g. community centre, recreation; spaces and sports provisions etc, and needs to show concrete timeframes for these proposals.

Kier Property Developments

- Supports the Council's preferred approach to future development of the Borough in respect of its identification of North East Enfield as one of the areas where growth and regeneration are to be focused.
- Notes that the preferred approach mentions that, along with other sites, the area at Southern Brimsdown could have the potential to accommodate up to 1,100 new homes up to 2026.
- Agrees with the Council's suggestion that land at Southern Brimsdown, in particular the Ponders End Industrial Estate, is suited to the accommodation of new residential development.
- Considers it will be important in any such scheme that the new homes at Southern Brimsdown create an attractive and sustainable community which, in part, will be reliant in achieving a critical mass of homes and residents, along with a mix of other uses. Considers that it may emerge, therefore, that Southern Brimsdown can and should accommodate a greater amount of residential than has been assumed within the 1,100 unit ceiling for the Ponders End area. Therefore, Kier suggests that the quantum of new housing is not set as a ceiling, by introducing the following or similar reference into the sixth paragraph in the text box; *"...although the precise amount of new housing will be determined as a consequence of more detailed site planning"*
- Supports identification of the southern end of Brimsdown at Duck Lees Lane for a new mixed use community as part of an employment led mixed use development,

but notes that the report states that any such mixed development should result in "no net loss of jobs". While Kier agrees with the principles and aspirations, the Strategy would be more realistic to recognise that achieving the same number of jobs on a smaller site area may not always be possible. This might easily be achieved by rephrasing the final parts of the first sentence in the eighth paragraph as; "...providing new quality homes and aiming to achieve no net loss of jobs."

Middlesex University (represented by CgMs)

- Supports the Council's intention to redevelop the site.
- Pleased that the importance of redevelopment of the site to North East Enfield has been recognised within the SGA report.
- Fully supports the preferred approach for NEE, and welcomes the opportunity to comments on future documents e.g. the Master Plan.

London Borough of Haringey

- Opposes allocation of housing in industrial zone between railway and reservoirs.
- Concerned about potential loss of Preferred Industrial Area.
- Traffic implications on LBH – request to be kept informed of outcomes of further work, including the Northern Gateway Access Package (NGAP).
- Interested in research into water based transport.

National Grid Property Holdings (represented by First Plan)

- Supports the approach to Ponders End and agrees that the redevelopment of key sites such as the NG gasholder will be vital to the regeneration of this area.
- Considers that alternative uses on the site to enable the existing gas holders to be removed and assist in the regeneration of the wider area need to be properly considered and provided for within the relevant DPDs, should further investigation into the proposed use of the gasholder site for an Academy School proves this proposal cannot go forward,
- Notes that pre-application discussions with the LPA and GLA within the last year, have confirmed the site's suitability in principle for residential development.
- Considers the preferred option should be amended to acknowledge that the NG site (separately to the land fronting South Street) is suitable for residential development, should further work conclude that an Academy is not feasible, no longer required in this location or funding not be forthcoming.
- Notes that the gas holder site is not located in South Street. The site is accessed via Falcon Road and Woodall Road. The adjacent land at South Street is under separate ownership.
- Suggests the following amended wording:
"*...The provision of a new Academy for children from the ages of 3 to 18 on the existing gas holder site on Falcon Road/Woodall Road, Ponders End will be supported. This will replace the existing Albany Secondary School further to the north. If subject to more detailed consideration and assessment of the site is found not to be able to accommodate the preferred option of an academy, the site would alternatively be suitable for new housing development.*"
- Considers that the Ponders End masterplan should be brought forward under the auspices of the AAP, and therefore subject to public scrutiny, or at the very least as an SPD, in accordance with PPS12 (Councils should not produce planning guidance other than an SPD, where the guidance is to be used in decision making or the coordination of development – para 6.4).

North London Waste Authority

Refer to NLWA response to the NEE AAP Preferred Options report –

- Supports the Council's overall approach to safeguard existing employment land
- Supports the release of sites where it is vacant, underutilised and under performing for mixed use opportunities.
- Objects to the loss of 5.5 ha of employment land at Southern Brimsdown particularly on the site to the south of Duck Lees Lane for mixed use residential led development.
- Considers that there is no justification for the release of southern Brimsdown for mixed uses and has not be informed by a robust market appraisal.
- Considers that the release of southern Brimsdown is inconsistent with the Employment Land Study [which suggested the release of Innova Park, Queensway and Redburn Trading Estate].
- Considers that the area to the south of Duck Lees Lane is appropriate as a waste facility. NWLA would support the development of waste facilities on sites that area located on Preferred Industrial Locations.
- Supports the development of waste facilities on sites in good proximity to the waterway, thereby utilising the River Lee to encourage sustainable transport.
- Recommends that policies EMP1, EMP2, EMP3 or PE1 be revised to support green technologies and businesses in the whole of Brimsdown, particularly southern Brimsdown.
- Supports the inclusion of the southern parts of Brimsdown within the boundary for Ponders End provided that the policy makes provision for waste management facilities to be developed on the southern parts.

SEGRO Plc (represented by Tribal MJP)

- Supports the identification of NEE, including Ponders End, as one of the priority areas for regeneration, the attraction of investment, and the enhancement of the environment.
- Considers that the existing employment function of key employment land holdings, e.g. SEGRO land holdings, should be safeguarded such that future regeneration proposals within the area will not prejudice the commercial viability and regeneration opportunities of the site.
- Considers that improving accessibility for pedestrians and cyclists to the waterside and Lee Valley Park, should not compromise the commercial requirements of a modern high quality industrial/warehouse development of contribute to the loss of valuable environment land
- Considers the opportunities for change should not result in constraints on redevelopment of existing employment land, which may impact upon the efficiency of use of employment land and financial viability in the current property market.

Transport for London

- Like CL, encourage the inclusion of references to locating green industries adjacent to the waterway, e.g. where the River Lee Navigation passes through industrial estates. This would significantly contribute to the connectivity of green industries by sustainable means, not only within the area, but also across London.
- While support is given to the focus on accessible locations and the creation of environments where people wish to live, work and access local facilities, suggests an assessment of the ability of infrastructure to support the levels of growth (notes that Ponders End Station's service level enhancements are not guaranteed). Bus service levels at the Mollison Avenue/Lea Valley Road area are not akin to those in the High Street/Nags Head Road area. Such evidence is considered essential to properly assess the effect of the growth.

- Considers that any development within north-east Enfield should not have an unacceptable impact on the safe operation or bus journey times of either the A1010 Hertford Road / Ponders End High Street and the A110 Southbury Road / Nags Head Road / Lea Valley Road, as both form a part of the Strategic Road Network (SRN). TfL should be consulted over any planned improvement works to these roads (as identified in the Borough's preferred approach section) that are required in relation to delivering the necessary infrastructure to sustain proposed levels of growth.
- Notes references to the potential merits and benefits of a Northern Gateway Access Package to improve accessibility and movement within North East Enfield, in spite of concerns expressed by the Highways Agency regarding previous proposals for a Northern Gateway Access Road (NGAR).
- Objects to references to new connections to the M25 and would not fund any proposals to increase major road capacity in North East Enfield.
- Concerned about continued references to increased road capacity within the Northern Gateway Access Package (NGAP). More through-traffic and rat-running in the area to/from the M25 will lead to greater congestion, particularly further south around Tottenham Hale.
- Considers that an access package which did not increase through-traffic or have significantly detrimental environmental impacts could be contemplated. Alleviating some of the conflicts with freight movements (particularly along Mollison Avenue), in particular schemes which improve traffic management and conditions for buses, cyclists, pedestrians and freight movements could be investigated. It is hoped that NGAP will focus on delivering these elements rather than access to the M25.
- Notes the Council's preferred approach in the Lee Valley rail line investment would be to replace level crossings at Brimsdown and Enfield Lock stations with new bridges and/or underpasses. It is unclear if this can be delivered within the lifetime of the plan and references should be omitted if delivery is unlikely to be achieved.
- Suggests the Council needs to be clearer about what transport enhancements are required for this suggested level of development, and how they might be delivered, and what level of contributions from developers will be required using planning obligations to contribute towards its funding. It is also important that new development is phased to match improvements to the transport infrastructure, and that a method for monitoring the delivery of development is put in place, which should be linked to the required transport improvements.

Joshi Kishorkumar

- Considers that the area needs great change.

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