

Local Plan Issues and Options 2018
Consultation Responses – All Other Consultees

Canal and River Trust
City of London Conservators
Department of Education
Duchy of Lancaster
Islington Swifts
London Wildlife Trust
Sport England
Swift Conservation



Strategic Planning and Design
Enfield Council
FREEPOST
NW5036
EN1 3BR

By email
localplan@enfield.gov.uk

Thursday 28th February 2019

Enfield Towards a New Local Plan 2036 Issues and Options Consultation

Dear Planning Policy Team,

The Canal & River Trust (the Trust) is the guardian of 2,000 miles of historic waterways across England and Wales. We are among the largest charities in the UK. Our vision is that “living waterways transform places and enrich lives”.

The Trust is the owner and navigation authority of the River Lee Navigation running along the east side of Enfield borough, and the adjacent towpath. Our waterways do, or have the potential to provide important areas for recreation, biodiversity, sustainable active transport (with related health and air quality benefit), business, tourism, a focal point for cultural activities, and are heritage assets.

Waterways can also provide a resource that can be used to heat and cool buildings, a corridor in which new utilities infrastructure can be installed and a way of sustainably draining surface water away from new developments. In some cases, it is also possible to transport freight via our waterways.

The Trust is also the owner of non-waterway land within the borough, including our office at Enfield Lock and the surrounding industrial estate

The Trust has reviewed the consultation document and has the following comments to make:

On page 208 (11.5.9) we are referred to as Canal ‘s’ & River Trust and on page 209 (SUS4) as Canal ‘s’ ‘and’ River ‘s’ Trust, please could this be amended to read Canal & River Trust in both cases.

It is pleasing to see the vision to enhance green and blue infrastructure including canals as stated in the document forward (page 5).

2 Promoting good growth options in Enfield

The borough has a high housing requirement which is emerging from the London Plan of 1850 dpa. This is well in excess of the levels that have been delivered in the past. The latest standardised calculation set out in the NPPF 2019 & NPPG suggests a further increase to 3500 dpa. The backdrop to the Local Plan is therefore one of significant pressure for the delivery of housing and the draft document recognises this as

London and South East

Canal & River Trust The Toll House Delamere Terrace Little Venice
London W2 6ND
T 0303 040 4040 E canalrivertrust.org.uk/contact-us

Patron: H.R.H. The Prince of Wales. Canal & River Trust, a charitable company limited by guarantee registered in England and Wales with company number 7807276 and registered charity number 1146792. registered office address First Floor North, Station House, 500 Elder Gate, Milton Keynes MK9 1BB

canalrivertrust.org.uk

a priority. Given the historic levels of growth which have been achieved there is clearly a need for a step change in the identification and delivery of housing going forward.

In identifying sites for potential housing development, the draft plan recognises the need to exhaust the use of brownfield land and also ensure that as many small sites as possible come forward.

In the Eastern Corridor the plan refers to 400 Ha of employment land and the strategic importance of this part of the Borough. The Plan seeks more efficient use of employment land through redevelopment and release of surplus land (E2). However, at paragraph 2.11.8 there is reference to no net loss of floor space through redevelopment of employment land.

The current preferred policy approach does appear to be restricting potential release of commercial land and there is considered an inherent conflict between the need to deliver housing and to protect employment sites in the Borough.

Residential development within an area which has been identified as a location for substantial regeneration and change during the plan period should be supported. The wholesale protection of employment land is not supported in the NPPF and any such approach would stifle change in the area. Given the sustainability of the area and also its focus as a location for change, there is a clear need to identify and release land for housing if the step change in housing delivery is to be achieved. The policy approach will not be able to deliver this and protect green belt land.

The release of small PDL sites for housing conflicts with the approach to prevent loss of employment floor space and therefore the plan will not deliver the growth needed. A more focused approach to meeting the housing needs, which could increase still further as identified by the Council, will be needed if the necessary housing is to be delivered.

The Trust suggests that over the plan period there may be opportunities for the redevelopment of our site at Enfield Lock to deliver housing, subject to supportive policies being in place. We suggest that this would provide the opportunity to deliver a more efficient use of the site whilst retaining the boat yard business and also the Trust's operational base. At present, access to the industrial estate is through a residential area and reducing potential for commercial traffic along this route would be a benefit to the area as a whole. There may also be opportunities to secure improved public open space, in combination with contributions from other developments, on the southern part of the Trust's site. The site falls within an area where significant change is expected during the plan period. It falls within an identified opportunity area as well as an Eastern Corridor. We have completed a call for sites form for Trust owned land at Enfield Lock, and submitted this separately to our response to the draft Local Plan.

General comments on policies to protect and enhance the waterway corridor

We note that no decisions have been made about how growth will be distributed across the borough at the current time. However, many of the options, especially if Crossrail 2 plans are approved, will likely see significant changes along the Lee Valley. In this context, we consider that policy G15 is insufficient to guide how new development will interact with the Lee Navigation, in order to protect and enhance the waterway corridor, respond to its challenges and maximise the opportunities that it provides. We suggest that the policy should be expanded to consider issues such as:

- Design principles for canalside developments (e.g. active uses, natural surveillance,
- The benefits that moorings and on-water uses on the vibrancy of the waterways.
- Use of waterways for waterborne freight.
- Use of canal water for heating and cooling.
- Recognition of waterway heritage.
- Protection of the structural integrity of the waterway and its infrastructure
-

Whilst many of these issues are considered elsewhere in the plan, we believe that there is a need for a waterway policy that clearly communicates a strategy for how the borough's waterways will 'contribute to the borough's growth strategy'. Where we have suggested changes to draft policies included in the plan in the following sections, these could instead be addressed by an improved waterway / Blue Ribbon Network policy. In addition to these points, we would suggest that as the plan moves towards adoption, the policies should be redrafted in order to provide more certainty as to what is required from development, i.e. statements that require developments to 'recognise' benefits or 'promote opportunities' should be replaced by statements such as 'development will deliver'.

3 Enhancing heritage

The River Lee Navigation, the towpath and bridges over the river, are all part of the heritage of the waterway. The navigation also includes smaller heritage features, such as mileposts, horse rope marks on bridges and iconic wooden lock gates, and are free for the community to visit and enjoy. Local policy should recognise these assets and encourage development to protect and enhance the historic character of the canals. It's vital that new development protects, respects and enhances these assets so that they can continue to be enjoyed now and in the future.

We would expect point 3.1.4 to have some recognition of the fundamental role that navigable waterways historically played in the development of settlement, and how the riverine communications of the Lee Valley provided the spine for industrial development, particularly from the late 18th century onwards.

When considering the Borough as a composite of zones that have heritage significance, the Lee Valley as a whole needs to be defined as a meaningful linear entity. This incorporates various receptors, such as Enfield Lock conservation area, part of the Enfield Town conservation area as well as a string of heritage assets along the Lea Navigation and River Lee, including traces of manufactories and workers' dwellings to the south of Enfield Lock.

Part of the quality of this industrial landscape is its legible stratification, whereby the evolution of development is physically evident, or can be drawn out with the aid of interpretation.

We note the gap in evidence base for the historic environment including the significance of waterways at point 3.2.6. We support the protection and enhancement of heritage assets and further collection of historic records. We have also reviewed the Heritage Strategy 'Making Enfield' and provided comments separately on that document.

Our waterways are inherently key viewing corridors which include strategic and local views. Protection of views is mentioned on p71, but there is no specific reference to waterway corridors.

The susceptibility of the Lee Navigation to be experienced by boaters and towpath users much in the same way as historically confers upon it the status of an open, living museum, in which functional traditions continue to be played out and the distinctive character of the waterway vernacular appreciated. Some of this setting is quite subtle and fragile.

Given the identification of former industrial land as a focus for development (3.6 Option 5 "develop industrial land" in "Consultation on a new plan" document), tension with the preservation and celebration of the Borough's riverine industrial heritage would seem inevitable, especially where intangible aspects of setting are concerned.

A measured approach to tackling this tension positively is offered at 3.1.12, where the role of heritage, design and place-making have in shaping new development, is outlined. Lessons learned from the Meridian Water ongoing project should be actively applied as other waterside locations are considered for similarly major development schemes.

4 Design excellence

We are pleased to see that the draft plan recognises the need for design excellence, respect for context and development that complements historic and environmental assets and their settings. Tall buildings adjacent to our waterways can adversely affect ecology, overshadow moorings and have a negative impact on amenity value for both visiting boats and pedestrians on the towpath. Waterside development should have regard to impact on the water space in terms of potential overshadowing and incorporate variety in terms of heights and breaks in frontage.

Where tall buildings are proposed next to our waterways, we would seek heights appropriate and sympathetic to the waterside including setbacks and staggered heights leading away from the water. We would request a daylight and sunlight report to accompany the planning application to understand the impact on moorings and the canal environment.

Tall buildings adjacent to the waterway can create a 'canyoning' effect around the canal, reducing its amenity value. The quality and use of the towpath and waterspace as an amenity asset, for pedestrians,

anglers, and boaters, can also be affected by shading. Therefore, it is important consideration is had to these impacts when tall buildings are proposed adjacent to waterways.

Overshadowing can also impact on biodiversity, as the reduced light and cooler temperatures may limit the population growth of phytoplankton and macroplankton food sources in the shaded areas, which could affect fish populations, and in turn bird populations.

We believe policy D2 Character and density (page 79) should include additional criteria to assess whether a tall building is acceptable based on impact on overshadowing including overshadowing of watercourses and their towpaths, microclimate including wind, heritage assets, light pollution and the surrounding context. We request this additional criteria be added to the policy.

8 Community and social infrastructure

8.2 Health and wellbeing

Our waterways contribute to the health and wellbeing of local communities and economies, creating attractive and connected places to live, work, volunteer and spend leisure time. These historic, natural and cultural assets form part of the strategic and local green-blue infrastructure network, linking urban and rural communities as well as habitats. By caring for our waterways and promoting their use we believe we can improve the wellbeing of our nation.

Our [research](#) shows that spending time by water, whether it be your lunchbreak, daily commute or just a weekend stroll, really does make us feel happier and healthier. With ever increasing rates of obesity, stress and declining mental health in the UK, we are uniquely placed to make a significant contribution to improving the wellbeing of millions of people. Our canals and rivers run through some of the most heavily populated communities in England and Wales, providing accessible green and blue space where it's needed the most.

Our work involves not only looking after our waterways, but promoting them widely to the people who have waterways on their doorstep so that many more people benefit from our free, accessible and local source of wellbeing.

We note that point 8.2.11 refers to the Council's Walking and Cycling with Healthy Streets Action Plan, however we have not been able to locate this action plan. If the plan is still being developed, we request to be consulted on it as it progresses.

We agree that 'Safe, accessible environments conducive to walking and cycling are more likely to encourage physical activity' and particularly support policy SI2 (g) facilitating walking and cycling and (h) new and improved access to inclusive open space and accessible green and blue space to encourage physical activity. The towpath should be specifically referred to as a route for walking and cycling, promoting wellbeing within policy SI2.

9 Enfield's green and blue spaces

We are pleased to see the important role of the Blue Ribbon Network being recognised and infrastructure contributing to the active use of waterbodies being viewed as an asset to the borough. We welcome reference to the canal for cooling (page 171 point 9.6.4). The canal water can also be used for heating buildings, and we have been involved in many successful projects on our network, where developments have found the system to be more efficient than air source pumps. We would therefore request that the Local Plan include reference to heating too, for developers who may wish to explore this technology.

Policy GI5 does not include any reference to moorings on navigable waterways including our network. The Trust's waterways in London are increasingly playing a role in meeting London's development needs. Over the past 7 years the number of boats on the Trust's London waterways has increased significantly, from 2164 in 2010 to 4786 in 2017 (121% growth). Over this period, the number of boats without a home mooring, i.e. those that should be continuously cruising the network, has more than quadrupled (417 in 2010 to 1906 in 2017).

The Trust released the London Mooring strategy in June of this year, setting out plans to improve the experience for boaters and to make our waterways able to be shared fairly by everyone.

We are keen that facilities are improved and additional facilities are provided where appropriate to assist in managing our canals. In Enfield, we are seeking short stay moorings and facilities at Enfield Lock and facilities at Ponders End among other things. The Blue Ribbon Network policy should reference the London Mooring Strategy as a document setting out how the canals should be managed going forward.

<https://canalrivertrust.org.uk/about-us/where-we-work/london-and-south-east/boating-facilities/london-mooring-strategy>

The Trust would be keen to discuss any assessment that the council proposes to take to meet the requirements of section 124 of the Housing & Planning Act (i.e. requirement for housing authorities to “consider the needs of people residing in or resorting to their district with respect to the provision of places on inland waterways where houseboats can be moored”).

People come from near and far to visit our waterways. They can have a beneficial impact on the local economy by providing attractive settings for waterside and on-water businesses. By encouraging these uses in appropriate locations, development plans can help the waterway attract more people and support the local economy.

Notwithstanding our comments about the scope of policy GI5 above, we suggest part b) should be re-worded to read:

b) Promoting opportunities for improved access to waterways, including the provision of infrastructure to support *boating*, walking, cycling, leisure and recreation and river-based transport and *businesses*.

With regard to part h) of policy GI5, whilst we agree with enhancement of natural habitat, we would like to stress that the River Lee Navigation is an artificially canalised river, engineered for industry. As such it would not be appropriate to alter the historic structure of this. To naturalise the edge of the rivers owned and managed by the Trust where they have been canalised for navigation, could undermine their role and function, so we would not accept a blanket policy requiring this. The policy either requires an explanatory note to advise this does not apply to canalised watercourses, or additional text, which we have suggested below.

Part h) of policy GI5 suggests that development be setback by an 8m buffer from the river. We do not support a blanket policy for an 8m set back, as it is important that development is designed in a way that is appropriate to its particular site and setting, with the water addressed at the heart of the design. We have experience of these type of requirements creating ‘dead’ spaces, that fail to appropriately address the waterspace, and can exacerbate anti-social behaviour.

We have been involved in many successful schemes built within 8m of our waterways or interacting with our waterways within an 8m distance through public realm and landscaping or smaller scale infrastructure to allow on-water activities. Development setback from the water can create unwelcoming and wasted space prone to littering and other antisocial behaviour and lacking in any sort of engagement or interaction with the water, potentially missing out on the benefits associated with our waterways and missing opportunities to provide positive outcomes for other uses, such as improved passive surveillance over the towpath.

The Town and Country Planning Association’s [‘Policy Advice Note: Inland Waterways’](#) (2009) (produced with support from British Waterways, our statutory predecessor) identifies the following as one of the guiding principles for waterside development:

It is important that the siting, configuration and orientation of buildings optimise views of the water, generate natural surveillance of water space, and encourage and improve access to, along and from the water.

The Trust, as British Waterways, published in 2000, [‘A Guide to Waterside Development and Improvement in London’](#) in partnership with the Metropolitan Police. This document provides advice on creating safe, active, attractive and accessible waterside developments which conserve and enhance the waterside character, which are still relevant today and are relevant outside of London. The document advises development should:

- have a strong sense of place, and create safe and active edges to the waterside;
- the principles of good urban design should extend onto the waterway itself and future waterside development needs to ensure that any new development is considered

holistically with the opportunities for water-based residential, leisure and commercial development to ensure life and vitality to the waterspace and towing path; and

- that emphasis needs to be placed on site planning, design layout and orientation to solve problems of security and safety.

We would argue that a blanket 8m setback will not enable the positive interaction, active surveillance or enhancement of the character of our waterways that we seek.

Whilst we appreciate that there may be benefits to biodiversity in leaving areas undeveloped adjacent to waterways, we would note again that our waterways are canalised and provide other functions beyond biodiversity value including for navigation, leisure and active travel along towpaths. To serve these functions it is not always appropriate to set development back from our waterways, instead it should respond to the site context and can often successfully interact with waterways, add passive surveillance and create lively destinations for people to enjoy being near water. There are many ways of enhancing biodiversity including bird and bat boxes, living walls and green roofs and floating reed beds within the water itself.

The Environment Agency has their own flood defence consent process to assess whether developments will be acceptable in terms of impact on flood risk, flood defences and the natural environment where works are proposed within 8m of a watercourse. To our knowledge, this is a consenting regime that considers the impacts of development within 8m rather than a strong presumption against it. We suggest that there is a lack of clarity for decision makers (and other parties) in the proposed policy about what circumstances will justify an exception to this.

We therefore request that part h) of policy GI5 read:

h) Restore waterbodies to their natural state where appropriate and ensure developments are set back to provide a minimum 8m buffer strip to the main river. Exceptions may be acceptable where a smaller buffer would result in a better environment or facilities for users of these multifunctional assets and where it can be demonstrated that there would be no adverse impacts on flood risk, flood defences or the protection and enhancement of the natural environment. The use of sustainable drainage system (SUDs) must be maximised on these sites to achieve an improvement in water quality in line with the aims of the Water Framework Directive (see draft policy approach SUS5).

Waterborne freight is mentioned at point 9.6.4 (page 171) but not in policy. The canals provide opportunity to transport freight via water, reducing congestion, carbon emissions and poor air quality generated by construction vehicles. Developers are often unfamiliar with this and reluctant to make use of it for waterside sites, although we often request that a condition to assess the feasibility of waterborne freight be added to decision notices for waterside sites, in accordance with the London Plan. We would like to see a requirement for waterborne freight feasibility assessment included in policy GI5 to further highlight the opportunity to developers.

10 Sustainable movement and transport

Towpaths are an excellent off-road walking and cycling route. Improving the quality and continuity of the towpath as a walking and cycling route is key to encouraging people to use the towpath. Improvements to the surface, the towpath width and way finding along the route are the main ways of supporting more people to walk and cycle.

The towpaths are great for recreation, can be an attractive way for people to commute, reducing congestion, carbon emissions and poor air quality in the wider area and supporting people to lead healthier lives. The River Lee Navigation provides a flat, direct and easy to access route for walking and cycling and close links with the rail network in Enfield (Brimsdown, Enfield Lock and Ponders End stations) and the towpath can easily be used for the first/last mile of journeys and have a positive impact on congestion as well as the health and wellbeing of local people.

This section does not refer to the 'Council's Walking and Cycling with Healthy Streets Action Plan' mentioned in section 8 (8.2.11). The "Cycle Enfield" (Mini Holland) programme is referred to (which is already in progress) but no details of what is actually going to be provided by this programme by the council, and there is no commitment or aspiration beyond this programme. No targets are laid out (Cycle Enfield hopes to increase cycling to 24,000 cycling journeys per year, however there is no view to what is beyond this).

We suggest that there should be an onward commitment to extend the cycling network beyond the current programme and bring forward new routes. Policy T3 should require development alongside our waterways

to contribute to towpath, wayfinding and access improvements to support active travel and we request that this be added to the criteria.

We have ambition to create a high quality, safe, pleasant, integrated walking and cycling network, with more people out on foot and on their bike on the towpath. We seek to reduced pedestrian-cyclist conflict, make the towpath better able to cope with increasing demand and encourage a broader range of people to regularly use the towpath.

The towpath in Enfield currently provides a North-South green rural route, supporting existing rail links and linking existing and future opportunity routes, connections with Cycle Enfield network routes, an off-road route with excellent healthy streets rating, offering a quiet rural route and links key employment, residential areas and regeneration areas particularly Edmonton Leaside, Ponders End, Brimsdown in Enfield, but also further north to Waltham Cross and Hertfordshire and south to Tottenham Hale and the QE Olympic Park.

We seek to improve four access points including adding one wheeling channel, to upgrade four sections of towpath totalling just over 8.5km and nine other more minor schemes smoothing cobbles, removing barriers and improving under bridge environments. To do this, we want to work in partnership with Enfield to achieve these improvements.

We note that the plan is not supported by an Infrastructure Delivery Plan at this early stage in its preparation. We would welcome further engagement with you (outside of the formal consultation periods) with a view to contributing towards the development of this.

11 Sustainable infrastructure and environmental impact

Waterways provide readily available opportunities for developments to incorporate innovative technologies to make use of its water such as hydropower and the abstraction of water for the heating and cooling of buildings, and we have been involved in many successful projects on our network, where developments have found the system to be more efficient than air source pumps. Whilst cooling using canal water has been mentioned at 9.6.4, this should be included in policy SUS3 to encourage developers to explore heating and cooling using canal water. We suggest that the plan should be explicit that policies relevant to energy use and generation are consistent with the energy hierarchy in the London Plan.

The River Lee Navigation can sometimes accept clean surface water drainage from adjacent developments, subject to an agreement with the Trust's Utilities Team. We would therefore ask that this be included as a potential option for developers explore and should be included in policies SUS4 and SUS5.

Other comments

Pre-application Advice

We would request that there be a section in the Local Plan encouraging developers to seek pre-application advice from the Canal & River Trust where development is proposed alongside our waterways. We would also advise developers to consult our Code of Practice for practical advice:

<https://canalrivertrust.org.uk/business-and-trade/undertaking-works-on-our-property-and-our-code-of-practice>

We hope to work with you closer as you progress the new Local Plan. Should you have any further queries on these comments, please feel free to contact me.

Yours faithfully,

Tessa Craig

Area Planner

<https://canalrivertrust.org.uk/specialist-teams/planning-and-design>



The Conservators of Epping Forest Response to London Borough of Enfield (LBE) Local Plan 2017-2036 Regulation 18 consultation

Promoting good growth (Chapter 2) and Sustainable Movement & Transport (Chapter 10)

1. The Conservators welcome the general direction and emphasis of the proposed Policies of the Local Plan, particularly towards a modal shift in transport access and the clear aspirations to enhance the environment of Enfield. However, we also recognise the significant task to achieve this given the level of development being proposed. We also remain concerned, as with other Local Plans, with the different time-scales that are implicit in the Plan, with transport infrastructure seemingly likely to lag behind the speed of, or pressure for, residential development (**para 10.1.5, page 177**).
2. As with other Local Plans close to or around Epping Forest SSSI/SAC, the new housing targets and the relative lack of extensive open space provision, together are likely to increase recreational pressures on existing sites like the Forest. Although the Forest lies outside the Borough of Enfield, and the Lee Valley Park is situated between most of Enfield and the Forest, the Forest's nearest point (Pole Hill) lies under 2km from the **Alma Estate, Ponders End**. Overall, the impact of the proposed expansion within the Opportunity Area 3 (**OA3 – Fig 2.2, page 34 and Fig. 2.15, page 53**) and particularly the **Meridian Water** development of 10,000 homes, which is situated 5km around the A406 from the southern parts of Epping Forest SSSI/SAC, could be significant for both traffic generation and recreational impacts .
3. The Epping Forest Visitor Survey 2017 (Footprint Ecology) demonstrated a Zone of Influence (Zoi) for recreational access to the SAC of 6.2km for visitors surveyed in the autumn of that year. A new survey is planned for early summer 2019 to provide additional information on visits to Epping Forest. The Conservators hope that we will be able to work and share evidence-gathering with a wider range of local authorities than for the 2017 survey and would greatly welcome further discussions with LBE on this issue.

4. In addition, the proposed large population increase along the Upper Lee Valley (OA3), and the concomitant increase in industrial activity being proposed, is likely to add to traffic movements, even with the efforts to ensure modal shift. CrossRail 2 seems unlikely to be in place before the end of the Plan period and we are concerned that development without this new railway infrastructure will mean big increases in pressure on the roads out of the OA3 area, including on the A406 and M25 corridors eastwards through Epping Forest.
5. We welcome the new emphasis within the NGAP package (**para 10.2.11, page 182**) on modal shift that has been advanced since the updated NEAAP of 2014. We give a cautious welcome to the aim to seek east-facing slip roads onto the M25 (**Fig 10.2, page 178**), which we assume will be restricted to HGV traffic, although there is little explanation in the Plan. The only reference to this seems to be in **para 2.14.2** (second bullet point) concerning “improvements to the M25 corridor”. Given the limited information in **Policy T1**, The Conservators would be concerned should any consideration be given to a new NGAR proposal. We hope that the exclusion of this from Regulation 18 will ensure this remains the case at Regulation 19.

Enfield’s Green and Blue Spaces (Chapter 9)

6. We also welcome **Policy GI4** (page 170, Chapter 9), in particular, as although Epping Forest is outside the Borough and is not named in the Plan, this Policy (GI4a) and b)) demonstrates a recognition of the Council’s role in protecting sites. We consider that, for the Regulation 19 submission Plan, there would need to be more accompanying text, including reference to Epping Forest SAC as well as Lee Valley SPA. We would also consider that the Policy itself would be more formally worded at the submission stage. The wording should clearly set out the Council’s role as a Competent Authority under the Habitat Regulations 2017.

Thank you for the opportunity to comment and we look forward to attending the forthcoming meeting in March with Council Officers.

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Our Ref: DfE/Local Plan/Enfield 2019

6th February 2019

Dear Sir/Madam,

Re: Enfield Local Plan Issues and Options

Consultation under Regulation 18 of Town and Country Planning (Local Planning) (England) Regulations 2012

Submission of the Department for Education

1. The Department for Education (DfE) welcomes the opportunity to contribute to the development of planning policy at the local level.
2. Under the provisions of the Education Act 2011 and the Academies Act 2010, all new state schools are now academies/free schools and the DfE is the delivery body for many of these, rather than local education authorities. However, local education authorities still retain the statutory responsibility to ensure sufficient schools, including sixth form places, and have a key role in securing contributions from development to new education infrastructure. In this context, we aim to work closely with local authority education departments and planning authorities to meet the demand for new school places and new schools. We do this through a variety of means, including by supporting the adoption of sound local plan policies, site allocations and guidance (all based on robust evidence) that facilitate the delivery of education infrastructure where and when it is needed and maximise developer contributions for schools. In this capacity, we would like to offer the following comments in response to the proposals outlined in the above consultation document.

General Comments on the Local Plan Approach to New Schools

3. The DfE notes that very significant growth in housing stock is expected in the borough over the plan period, with the housing target proposed in the Mayor's latest draft new London Plan increasing to 1,876 dwellings per annum from 2019/20 until 2028/29 (up from 798 dwellings per annum). This will place significant new pressure on social infrastructure such as education facilities. The Local Plan will need to be 'positively prepared' to meet the objectively assessed development needs and infrastructure requirements.
4. The DfE welcomes reference within the plan to support the development of appropriate social and community infrastructure (e.g. Chapter 8). We also support the principles set out in policy SI1 Social and Community Infrastructure regarding ensuring development is supported by appropriate community facilities to meet local needs, aligning delivery of such infrastructure with the needs of existing and new communities, and seeking planning obligations to secure new and improved facilities to mitigate the impacts of developments. In light of the requirement for all Local Plans to be consistent with national policy, you will have no doubt taken account of key national policies relating to the provision of new school places, but it would be helpful if they were explicitly referenced or signposted within the document. In particular:

- The *National Planning Policy Framework* (NPPF) advises that local planning authorities (LPAs) should take a proactive, positive and collaborative approach to ensuring that a sufficient choice of school places is available to meet the needs of communities and that LPAs should give great weight to the need to create, expand or alter schools to widen choice in education (para 94).
 - The DfE supports the principle of Enfield Council safeguarding land for the provision of new schools to meet government planning policy objectives as set out in paragraph 94 of the NPPF. When new schools are developed, local authorities should also seek to safeguard land for any future expansion of new schools where demand indicates this might be necessary.
 - Enfield Council should also have regard to the Joint Policy Statement from the Secretary of State for Communities and Local Government and the Secretary of State for Education on '*Planning for Schools Development*'¹ (2011) which sets out the Government's commitment to support the development of state-funded schools.
5. Given the above and the Duty to Cooperate on strategic priorities such as community infrastructure (NPPF para 24-27)², the DfE encourages close working with local authorities during all stages of planning policy development to help guide the development of new school infrastructure and to meet the predicted demand for primary and secondary school places. Please add the DfE to your list of relevant organisations with which you engage in preparation of the plan.
 6. In this respect, the DfE commends, for example, the approach taken by the London Borough of Ealing in producing a Planning for Schools Development Plan Document (DPD, 2016)³. We are not suggesting that Enfield Council produces a separate DPD as Ealing have done, but we do believe that the systematic approach they have taken is informative for local plans. The DPD provides policy direction, establishes the Council's approach to providing primary and secondary school places and helps to identify sites which may be suitable for providing them (including, where necessary and justified, on Green Belt/MOL), whether by extension to existing schools or on new sites. It includes site allocations as well as policies to safeguard the sites and assist implementation and was adopted in May 2016 as part of the Local Plan. The DPD may provide useful guidance with respect to an evidence based approach to planning for new schools in the emerging Enfield Local Plan, securing site allocations for schools as well as providing example policies to aid delivery through Development Management policies.
 7. Ensuring there is an adequate supply of sites for schools is essential and will ensure that Enfield Council can swiftly and flexibly respond to the existing and future need for school places over the plan period.

Site Allocations

8. At this early stage of the emerging Local Plan site allocations have not yet been drafted. The next version of the Local Plan should seek to identify specific sites (existing or new) which can deliver the school places needed to support growth, based on the latest evidence of identified need and demand in the updated Infrastructure Delivery Plan (IDP). We note and welcome the commitment to undertake a social infrastructure needs assessment to inform an updated IDP.
9. The site allocations or associated safeguarding policies should also seek to clarify requirements for the delivery of new schools, including when they should be delivered to

¹

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/740441/National_Planning_Policy_Framework_web_accessible_version.pdf

² NPPF paragraph 24-27 specifies that this collaborative working should include infrastructure providers.

³ https://www.ealing.gov.uk/info/201164/local_plans/1961/planning_for_schools_dpd

support housing growth, the minimum site area required, any preferred site characteristics, and any requirements for safeguarding additional land for future expansion of schools where need and demand indicates this might be necessary. For an example of the latter, see draft policy CC7 in Milton Keynes's Plan:MK Preferred Option draft from March 2017⁴. Where schools are allocated as part of wider development schemes, site allocations should make clear that the developments will be expected to provide land at nil cost and contributions to the construction of the schools, commensurate with the need generated by development.

10. Please note that Montagu Evans, on behalf of DfE, have made a representation to the 'Call for Sites' on land adjacent to Chase Farm Hospital which is now owned by DfE. This asks the council to consider allocating parts of the site for education use and housing.
11. While it is important to provide clarity and certainty to developers, retaining a degree of flexibility about site specific requirements for schools is also necessary given that the need for school places can vary over time due to the many variables affecting it. The DfE therefore recommend the Council consider highlighting in the next version of the Local Plan that:
 - specific requirements for developer contributions to enlargements to existing schools and the provision of new schools for any particular site will be confirmed at application stage to ensure the latest data on identified need informs delivery; and that
 - requirements to deliver schools on some sites could change in future if it were demonstrated and agreed that the site had become surplus to requirements, and is therefore no longer required for school use.
12. The local planning authority should note that there are two routes available for establishing a new school. Firstly, where a local authority thinks a new school needs to be established, section 6A of EIA 2006 places the local authority under a duty to seek proposals from new school proposers (academy trusts) to establish an academy (free school) and to specify a date by which proposals must be submitted to the local authority. In this 'local authority presumption route' the local authority is responsible for finding the site, providing the capital and pre-/post-opening funding and managing the build process. Secondly, an academy trust can apply directly to the Department for Education during an application round or 'wave' to set up a free school. The local authority is less involved in this route but may support groups in pre-opening and/or may provide a site for basic need. For further details please see:
<https://www.gov.uk/government/publications/establishing-a-new-school-free-school-presumption>

Development Management

13. The DfE notes the adopted Development Management Policies include policy DMD 50 which requires non-residential major development to achieve at least BREEAM 'Excellent'. DfE centrally funded schools are built to a specification that incorporates the BREEAM 'Very Good' standard without certification. In the context of the need to maximise value for money in education spending and make efficient and effective use of public funds, we question if a requirement for schools to achieve BREEAM 'Excellent' rather than 'Very Good' is justified.

Forward Funding

14. In light of the significant housing growth proposed, including in the opportunity areas of New Southgate and Upper Lee Valley, emerging DfE proposals for forward funding schools as part of large residential developments may be relevant, for example if viability becomes an issue. We would be happy to meet to discuss this opportunity further once

⁴ <https://www.milton-keynes.gov.uk/planning-and-building/planning-policy/plan-mk>

the options have been finalised and if/when relevant. Any offer of forward funding would seek to maximise developer contributions to education infrastructure provision while supporting delivery of schools where and when they are needed.

Evidence Base

15. The approach to planning for schools should be 'justified' based on proportionate evidence. Chapter 8 refers to Enfield's School Expansion Programme and states that the assessment of need for school places will be updated. It will be helpful if this evidence base can set out clearly how the forecast housing growth at allocated sites has been translated (via an evidence based pupil yield calculation) into an identified need for specific numbers of school places and new schools over the plan period. Anticipated changes in flows of pupils across local authority boundaries (including as a result of new development in adjoining boroughs) should be taken into account, particularly for secondary schools, given the high prevalence of such movements in London. This will help to demonstrate more clearly that the approach to the planning and delivery of education infrastructure is justified based on proportionate evidence. If required, the DfE can assist in providing good practice examples of such evidence base documents relevant to this stage of your emerging Plan.

Developer Contributions and CIL

16. One of the tests of soundness is that a Local Plan is 'effective' i.e. the plan should be deliverable over its period. In this context and with specific regard to planning for schools, there is a need to ensure that education contributions made by developers are sufficient to deliver the additional school places required to meet the increase in demand generated by new developments. The DfE note that Enfield has a Section 106 SPD (November 2016) which sets out details of education contributions, and implements a Community Infrastructure Levy to fund rail and causeway infrastructure for Meridian Water. The DfE support the Council's approach to ensure developer contributions address the impacts arising from growth. We recommend that the council considers updating the SPD alongside the revised Local Plan.
17. The DfE would be particularly interested in responding to any update to the Infrastructure Delivery Plan or review of infrastructure requirements, which will inform any CIL review and/or amendments to the Regulation 123 list. As such, please add the DfE to the database for future CIL consultations.

Conclusion

18. Finally, I hope the above comments are helpful in shaping Enfield Council's Local Plan, with specific regard to the provision of schools.
19. Please do not hesitate to contact me if you have any queries regarding this response. The DfE looks forward to continuing to work with Enfield Council to aid in the preparation of a sound Local Plan.

Yours faithfully,

Douglas McNab MRTPI
Forward Planning Manager

T Web: www.gov.uk/df

From: Neil Hall
To: [LocalPlan](#)
Subject: New Enfield Plan – Comments by the Duchy of Lancaster
Date: 27 February 2019 17:36:38

Please find below our comments and observations on the emerging Plan.

We would welcome the opportunity to discuss our land adjacent to Hadley Wood Station as a sustainable release from the Green Belt. This land has already been submitted to the call for sites process.

Section 2 - Promoting Good Growth Options

General Comments

The Duchy considers that a hybrid approach to meeting the challenging growth requirements is required. To provide a range of housing opportunities, minimise the need to travel and provide new homes in a range of locations it is considered that the benefits of each option should be maximised.

We would particularly support growth focussed around Town Centres and all Stations, and Plan Led Green Belt Review. The two strategic options are in any event inter linked and the need to provide access to rail transport could form part of the exceptional circumstances for altering Green Belt boundaries. Locations and opportunities should be maximised around transport interchanges to encourage modes other than the car, especially those with rail access and complementary local services such as schools, jobs and retail opportunities.

Some areas of Green belt will be extremely sensitive and will need protecting. However, other areas on the urban fringe may lend themselves to sensitively designed development as 'infill' or 'rounding off' without harming the overall strategic purpose in that location. They have often been protected for many years despite their being no public access or use, and therefore restricting the delivery of homes and in practice offering few community benefits.

It is recognised that a balance will need to be struck to also encourage renewal of existing urban areas, but if planned in a balanced fashion these objectives need not conflict with each other. A wider range of locations for housing is essential to help accelerate housing delivery and provide a wider spread of market and affordable homes across the Borough, and not just in the east.

The new plan should be informed by a comprehensive Green Belt review to identify suitable opportunities for sustainable development across the whole Borough and around all stations.

Figure 2.2 Growth Options Diagram

Figure 2.2 should be amended to identify the area around Hadley Wood Station as a potential area for growth and for Green Belt Review. There is no justification why the area around Hadley Wood Station should be excluded from consideration under the spatial options. The Duchy has put forward a suitable 11ha site adjacent to the Station into the call for sites process. This should be considered.

It is also noted that Figure 2.2 does not accord with growth Objective 1 at 2.6.2 which recognises the need focus development around all stations as part of a

sustainable development strategy.

2.8 Town Centres and Areas Around Stations

This spatial option recognises the advantage of being within 800m of a rail station. These sustainability advantages can be part of the exceptional circumstances for Green Belt review. The Duchy supports this option provided it includes the consideration of land around Hadley Wood Station. This could be a missed opportunity and is one of the few options for growth in the north western part of the Plan area. The Duchy has submitted a suitable site adjacent to the station to the call for sites process.

The Town Centres and Areas Around Stations option should include land around Hadley Wood Station in accordance with Objective 1. Duchy land at Camlet Way should be considered as a sustainable site.

2.12 Strategic Plan-Led Review of the Green Belt

The Duchy supports the review of Green Belt boundaries especially where this would help deliver sustainable development around established transport hubs. It is considered that this can be part of the NPPF exceptional circumstances test and accords with the approach at NPPF138.

However, we are extremely concerned that this option is to be limited to the Crews Hill area as set out at 2.12.2 when other sustainable options are available at Hadley Wood, and potentially elsewhere. The exercise appears to be pre-determined rather than based on an objective process that casts the net wide and considers all options that benefit from rail access.

Large scale growth at Crews Hill will require major infrastructure investment and land assembly. There are few existing services or facilities. Growth is likely to result in the sprawl of Enfield north to the M25 further fracturing the Green Belt in this location and significantly narrowing the gap with Cuffley. If proposed at a smaller scale it is likely to be unsustainable and divorced from key facilities.

It is therefore not clear why the Crews Hill option is stated at 2.12.2 to perform better than say selective release around existing settlements, and especially at places like Hadley Wood. Such smaller options could result in rounding off and infill, avoiding the need for major Green Belt incursions. They have the benefit of existing infrastructure making them easier to deliver and more likely to meet affordable housing requirements. These factors must also be considered in the appraisal of such growth options.

The Green Belt assessment must be fine grained and detailed enough to consider a wide range of options. Releasing several smaller sites on the urban edge and at Hadley Wood must be tested as an alternative to the Crews Hill area. It is not clear why this area is being favoured or why it is it has the greatest potential as the Plan states.

The Duchy supports the review of Green Belt boundaries provided it considers land around all stations and smaller site options, such as land at Hadley Wood Station, as a reasonable alternative to Crews Hill. The review should be combined with other spatial options and with the focus for growth around rail hubs to maximise the benefits.

Neil Hall
Planning and Development

Office tel - 0207 269 1700 Office fax - 0207 269 1710



DUCHY of LANCASTER
1 Lancaster Place, Strand, London WC2E 7ED

Website - www.duchyoflancaster.co.uk

This message is confidential and may be legally privileged or otherwise protected from disclosure. If you are not the intended recipient, please telephone or e:mail the sender and delete this message and any attachment from your system; you must not copy or disclose the contents of this message or any attachment to any other person.

From: Islington Swifts
To: [LocalPlan](#)
Subject: New Enfield Local Plan Consultation response.
Date: 25 February 2019 22:55:48

Dear Enfield Local Plan Consultation

Reference: page 169, section 9.5 Biodiversity and Sites of Importance for Nature Conservation.

In summary:

- We request that section 9.5 Biodiversity and Sites of Importance for Nature Conservation includes a requirement for integrated nesting and roosting sites such as "swifts bricks" and "bat bricks" in new development, including refurbishments and extensions where suitable.
- This is in line with the draft London Plan which states: "*in developing Development Plan policies, boroughs should... 3) support the protection and conservation of priority species and habitats that sit outside the SINC network... 4)... [include] features such as artificial nest sites, that are of particular relevance and benefit in an urban context*" (Chapter 8 Policy G6B).
- The draft Islington Local Plan provides an ideal model for a clause for this (G4 Biodiversity section 5.27 page 153).

(Links to relevant Local Plans are included at the end.)

In more detail:

We are Islington Swifts Group and are a voluntary independent conservation group acting to promote endangered urban biodiversity such as swifts.

Although we originated in Islington we are active in Enfield including:

- Article in The Enfield Society newsletter issue 210, page 9.
- Upcoming talk for The Enfield Society on Tuesday 26th March at Jubilee Hall.
- Project with Countryside plc at Shepcot House, New Avenue Estate N14, to transfer the swifts colony which is located in a building scheduled for demolition in 2020:
 - there are at least 27 pairs of swifts currently (possibly the largest colony in one building in London), and 42 nesting bricks for swifts have already been installed by the contractor in two new buildings.

Our comment relates to page 169, section 9.5 Biodiversity and Sites of Importance for Nature Conservation.

- Swifts are amber-listed in the UK due to their rapid decline (25% in 5years based on latest BTO statistics #), house sparrows are red-listed.
- These birds are currently found in Enfield (confirmed by London Bird Atlas, 2018).
- Loss of nest sites is a significant factor in their decline (RSPB ##).
- This demand for nest sites can successfully be met by integrated nesting sites in buildings (Action for Swifts ###).
- Integrated roosting sites can also be provided for bats (lbstock ####).
- These are low cost and zero maintenance.
- The installation of 42 bricks for swifts at New Avenue Estate N14 by Countryside plc demonstrates that it is straightforward to install a high-density of these nesting bricks in mainstream developments.

We request that section 9.5 Biodiversity and Sites of Importance for Nature Conservation includes a requirement for integrated nesting and roosting sites in new development.

Note that the draft London Plan includes a requirement for: "*in developing Development Plan policies, boroughs should... 3) support the protection and conservation of priority species and habitats that sit outside the SINC network... 4)... [include] features such as artificial nest sites, that are of particular relevance and benefit in an urban context*" (Chapter 8 Policy G6B).

The draft Hackney Plan 2033 includes a specific requirement for nesting boxes for swifts, sparrows, starlings and/or bats in developments (Section LP47 Biodiversity, clause D).

The draft Bexley Local Plan also states that "*All development including minor development, such as rear extensions, has the ability to provide biodiversity measures such as green roofs, walls and habitat features (e.g. bat and bird boxes). Urban living bird species such as swifts have been in decline... The Council encourages bird and bat boxes to be incorporated directly into the building fabric*" (Biodiversity clause 6.58, page 98).

The draft Islington Plan 2020-2035 includes an ideal standard clause as follows:

- G4 section 5.27 page 153 states: "*Islington's wildlife depends not only on green spaces, but also on the artificial fabric of the city. Buildings can provide roosting sites for bats and nesting opportunities for birds such as swifts, house sparrow, peregrine falcon and black redstart, species that have seen large population declines, and which are dependent on built areas for their survival. Walls can provide habitats for many of species of plant, including ferns and mosses, and also provide spaces for invertebrates. Developments involving refurbishment and/or extension of existing buildings may impact species using the existing buildings, therefore measures to ensure retention and enhancement of such species will be required. Developments involving new and existing buildings should also utilise opportunities to attract new species to a site through such measures. All wildlife habitats must be designed in accordance with the council's Biodiversity Action Plan, and in many cases, will include micro habitat creation. Artificial nest boxes/bricks should be incorporated within developments (refurbishments, extensions and/or new build) to provide nesting and roosting opportunities for birds, including species under threat such as swifts, house martins, swallows and house sparrows, and where appropriate, bats.*"

References:

<https://blx1.bto.org/birdtrends/species.jsp?s=swift>

<https://www.rspb.org.uk/our-work/conservation/conservation-and-sustainability/safeguarding-species/help-us-help-swifts/>

<http://actionforswifts.blogspot.com/2013/06/swifts-occupy-ibstock-swift-bricks-at.html>

<https://www.ibstockbrick.co.uk/kevington/eco-products/>

Local Plans:

https://www.london.gov.uk/sites/default/files/draft_london_plan_-_showing_minor_suggested_changes_july_2018.pdf

<https://hackney.gov.uk/article/4275/Local-plan-2033-LP33->

<http://www.bexley.gov.uk/sites/bexley-cms/files/2019-02/BLP-Reg-18-Consultation-Paper-for-Publication-February-2019.pdf>

https://www.islington.gov.uk/~/_/media/sharepoint-lists/public-records/planningandbuildingcontrol/publicity/publicnotices/20182019/20181119localplanstrategicandmpoliciesdpdreg18nov2018reducedsize1.pdf

Dean Bradley House
52 Horseferry Road
London
SW1P 2AF
Tel: 020 7261 0447
Fax: 020 7633 0811
enquiries@wildlondon.org.uk
www.wildlondon.org.uk



Planning Policy
Strategic Planning and Design
Enfield Council
Civic Centre, Silver Street
EN1 3BR

27th February 2019

Dear Madam or Sir,

ENFIELD; TOWARDS A NEW LOCAL PLAN 2036; ISSUES AND OPTIONS *Public Consultation (Regulation 18), December 2018*

Thank you for giving London Wildlife Trust the opportunity to comment on the above. The Trust has been infrequently active in Enfield over the past 15 years or so, but we are undertaking enhancements on the Pymmes Brook and are now engaged with Council in its plans for Meridian Water. We are also partners at Walthamstow Wetlands in the Lee Valley working with neighbouring borough councils, the Lee Valley Regional Park Authority, Natural England and others to manage and help future-proof the quality of the ecological assets within the Valley and associated statutory and non-statutory wildlife sites within it.

The Trust recognises the challenges the borough faces that the New Local plan aims to address. These include “*significant disparities in the borough, especially in access to and quality of the local environment and infrastructure such as provisions for health, education, open space and transport facilities.*” The demand and requirement for new housing in London means we also understand that the Council needs “*to plan for a significant amount of housing growth*” and “*looking at new ways of building homes, new sources of housing land and new areas of the borough not previously considered for homes.*” To achieve this whilst at the same time not compromising – and hopefully enhancing – the natural environmental assets of the borough will require significant care.

We set out our comments and suggested amendments below.

1. Introduction

1.9 Enfield in London and the wider context

There is some important natural environment context too, such as the river Lee catchment (Lee, Lee Navigation, Pymmes/Salmon Brooks, etc.), which we acknowledge is referred to in later chapters but underplayed here. We recommend that there should be reference to the Lee Valley being a major bird migratory route, and that with 37% of Enfield designated as Metropolitan Green Belt with some important tracts of woodland is also of important context.¹ The borough supports a regionally important population of globally threatened (and protected) stag beetle, largely in and around Ponders End, as well as other protected species.

9.6 The Council is a key partner in these initiatives and will play a vital role in the promotion and delivery of the economic growth and environmental resilience of these areas.

¹ “Over a third of the borough is designated greenbelt that makes a significant contribution to its unique character” (para 4.1.4.)

Figure 1.6: Challenges in Enfield

The Trust welcomes and supports: *Protect and enhance the borough's biodiversity and habitats and positively plan for addressing the implications of climate change.*

1.11 Challenges facing Enfield

Para 1.11.1: We welcome reference to “*unparalleled access to high quality greenspaces; our long established local character (supported by local culture, history and heritage);...*”

Para 1.11.2: We welcome and support the Plan's commitment to “*Provide for new and improved open space, and green and blue infrastructure*” and “*Protect and enhance the borough's biodiversity and habitats, including designated areas of national importance and positively plan for addressing the implications of climate change.*”

2. Promoting good growth options in Enfield

We acknowledge that during the consultations prior to this draft that there was support for building homes in the Upper Lee Valley, town centres, the A10 corridor and on existing Council-owned estates. There was also some support for low density housing in the Green Belt, “*recognising that not all Green Belt is open countryside.*”²

Para 2.3.4. We acknowledge the need for new burial space in the borough, as there is still a considerable potential shortfall.

These pressures will also undoubtedly exert adverse impacts on biodiversity, especially on species less tolerant of people, or vulnerable to the impacts of diffuse pollution.

2.4 How must we plan differently?

Para 2.4.1 We note that “*Exhausting all reasonable opportunities on brownfield land, making underused land work harder and optimising densities remains first principles of this new Local Plan.*” We are concerned that many brownfield sites support biodiversity interest and ‘underused’ land does not recognise its existing ecological value (which may be low or high) or potential. Reliance on the existing network of ‘protected’ green spaces is not enough to address the needs to support biodiversity and adapt the borough to the impacts of a changing climate; good growth applies to Enfield's natural environmental assets as well [CHECK]

Box: How can we plan to deliver differently?

We welcome and support the principles behind “*Direct new development opportunities back to our main town centres to help them thrive; Relax retail policies and promote development within individual residential curtilages; Intensify development in areas around station[s];*” and “*Proactively manage and optimise low density industrial land to increase capacity for redevelopment for both housing and employment.*”

We are concerned that “*Redevelop underutilised and low-density land such as surface car parks and underused highway land for both housing and employment*” may result in the loss of green space. We support the principle but this needs to align with the aims to address inequalities of open space provision.

We are concerned that “*Optimise the Council's land portfolio for new development including estate renewal and regeneration programmes;*” and “*Revisit Green Belt boundaries in line with the NPPF to promote sustainable patterns of development to meet growth*” is likely to result in a net loss of green space, and also the potential to enhance the quality of existing green space. The loss of greenspace in existing housing estates through in-fill will cause disproportionate impacts on people's access to greenspace, especially in areas of deficiency.

² Somewhat curious statement as Green Belt, by definition, has to be open in character (NPPF, 2018).

2.5 Enfield's draft vision and growth objectives

We are concerned that this otherwise admirable vision for the borough makes no mention of the natural environment for its intrinsic worth, and the several thousand species that also have their home in the borough. Enfield supports an important biodiversity and is adjacent to a nationally significant migratory route for birds. We would recommend an additional line should be included in the vision along the lines of:

A Place for Diversity, ~~&~~ Equality, and Sustainability

New and regenerated neighbourhoods will be safe and defined by the highest standards of well designed, affordable, accessible and eco-friendly homes and with access to public spaces. Enfield's natural environment will be protected, enhanced and promoted to ensure its biodiversity flourishes and people's access to nature is closer to home.

2.6 Growth objectives

- **Objective 1: Promoting and managing growth**

Whilst we support the general principles behind this objective we remain concerned aspects of this, such as potential designation of Green Belt land and in-fill of housing estates, could result in a significant net loss of green space in the borough. Further detail is required to ascertain the environmental impacts of where and how new development will be encouraged.

- **Objective 2: Achieving design excellence**

We support this objective.

- **Objective 3: Enhancing Enfield's assets**

We support this objective, but recommending adding to the last point:

To protect conditions for and secure enhancements to biodiversity.

- **Objective 4: Promoting a green environment**

We support this objective.

2.7 A growth strategy for people and places

We acknowledge that each of the seven "*potential options has its strengths and weaknesses*" and that at this stage "*a deliberate decision has been made not to identify a preferred development strategy*" in the consultation document. We respond to each below.

2.8 Town Centres and areas around stations

We concur with the benefits and challenges described in the supporting paras. Overall, we believe this is one of the preferred approaches. However, existing densities may make provision of new green space difficult to achieve.

2.9 Transport corridors

We concur with the benefits and challenges described in the supporting paras. Overall, we believe this is one of the preferred approaches.

2.10 Estate renewal and regeneration programmes

We concur with the benefits and challenges described in the supporting paras, and for the opportunities to secure green infrastructure gains at Meridian Water. In-fill of existing housing estates, however, can result in the net loss of green space, and such approaches need to ensure that the value and potential benefits of greenspaces assets within estates are adequately considered, and ideally enhanced through regeneration. This has been a key concern within the Neighbourhoods Green programme.³

³ Wheeler, N. 2011. *Greener Neighbourhoods: A good practice guide to managing green space*, National Housing Federation. See: www.neighbourhoodsgreen.org.uk/resources/greener-neighbourhoods-

2.11 The Eastern Corridor and industrial areas

We concur with the benefits and challenges described in the supporting paras, and believe this is one of the preferred approaches. We note figure 2.13 includes part of the Trust's Camley Street Natural Park; the role of this site within King's Cross's regeneration could be a model for new green infrastructure within post-industrial land development.

2.12 Strategic plan-led approach to Green Belt

We acknowledge the benefits and challenges as set out in the supporting paras, although we don't necessarily agree with all. We recognise the need for taking a strategic plan-led approach to the borough's Green Belt as a necessary option to explore to accommodate projected population growth. This, of course, may conclude that the existing Green Belt boundaries are justified under the criteria of the NPPF; any proposed changes would need to be justified on their own terms, rather than simply to find space for new development.

2.13 Future Crossrail 2 growth corridors

We concur with the benefits and challenges described in the supporting paras, and believe this is one of the preferred approaches. Nevertheless, this will likely place increasing pressure on existing railside greenspace, and would need to sensitively consider the nearby SSSI and Lee Valley Special Protection Area.

2.14 Opportunity Areas

We concur with the benefits and challenges described in the supporting paras, and believe this is one of the preferred approaches. We welcome in the reference under the Upper Lee Valley (para 2.14.2) that "*Environmental benefits should also rebalance a heavily urban and industrialised corridor with accessible, safe and quality green open spaces in the Lee Valley Regional Park and its reservoirs.*"

2.15 Do nothing [sic] is not an Option

We concur with this.

3. Enhancing heritage

3.2 Design quality and local character

We concur with the rationale described in the supporting paras.

- **HE1 Draft policy approach: *Design quality and local character***
We welcome and support this policy approach.

3.3 Designated heritage assets

We concur with the rationale described in the supporting paras.

- **HE2 Draft policy approach: *Designated heritage assets, their setting and archaeology***
We welcome and support this policy approach.

3.4 Locally listed and undesignated heritage assets and cultural practices

We concur with the rationale described in the supporting paras.

- **HE3 Draft policy approach: *Locally listed and undesignated heritage assets and cultural practices***
We welcome and support this policy approach.

3.5 Views

- **HE4 Draft policy approach: *Views***
We welcome and support this policy approach.

4. Design excellence

We concur with the rationale described in the supporting paras.

4.2 Achieving design excellence

- **D1 Draft policy approach: *Achieving design excellence***
We welcome and support this policy approach.

4.3 Character and density

- **D2 Draft policy approach: *Character and density***
We welcome and support this policy approach.

4.4 Design for co-location and mixed use development

- **D3 Draft policy approach: *Design for co-location and mixed use development***
We welcome and support this policy approach.

4.5 Designing a sustainable, safe and inclusive borough

- **D4 Draft policy approach: *Designing for a sustainable, safe and inclusive borough***
We welcome and support this policy approach.

5. Meeting Enfield's housing needs

We support para 5.13 in that "*Crucially, all new development across the borough needs to support... the environmental, social and economic sustainability,*"

5.2 Housing growth and quality

- **H1 Draft policy approach: *Housing growth and quality***
We welcome the recognition that new housing will need to "*protect[] and enhance[e] the borough's physical, natural and historic environment.*"

5.4 Small sites

We acknowledge the policy direction of the New London Plan for the development of small sites. There are some boroughs which will rely significantly on small sites to meet their housing targets, but which may also have, for example, an existing deficit of access to natural green space. Whilst small sites will make an important contribution to housing delivery, they often contribute to boroughs' stock of locally accessible open space and wildlife habitats, and it may be difficult to balance their loss. We would expect that the potential, for small sites to contribute to other borough objectives as well as housing needs to be considered.

- **H3 Draft policy approach: *Small sites***
We welcome the statement that "*Applications are required to be in compliance with all other relevant Local Plan policies.*"

5.9 Gypsy and traveller accommodation

- **H8 Draft policy approach: *Gypsy and traveller accommodation***
We welcome the statement that "*Development does not have a detrimental impact on the natural environment.*"

7. Planning for vibrant town centres

7.4 Evening and night time economy

Under para 7.4.8 we are concerned that this doesn't address the impacts of the night-time economy on nocturnal biodiversity, such as bats, or a desire to protect dark skies within the city. Whilst the policy is aimed at town centres, these can and do support biodiversity, with bats also subject to legal protection.

- **TC4 Draft policy approach: *Evening and night time economy***

We recommend that also needs to acknowledge adverse environmental impacts, along the lines of:

Development proposals would need to demonstrate that:

- *There would be no detrimental harm to the local environment and/or amenity of the neighbours resulting from the use itself or from those travelling to and from the facility;*

8. Community and social infrastructure

We welcome and support the rationale described in the supporting paras.

- **SI1 Draft policy approach: *Social and community infrastructure***

We welcome and support this policy approach.

- **SI2 Draft policy approach: *Health and wellbeing***

We welcome and support this policy approach. We suggest clause h) should be amended slightly:

- *h) The need for new or improved, or access to inclusive open space and sports facilities, including good quality, secure playspace and informal recreation provision for young people, access to food growing and accessible natural green and blue spaces to encourage greater participation in physical activity and provide relief from the urban environment; and*

9. Enfield's green and blue spaces

We welcome and support the rationale described in the supporting paras, with the additional following observations and recommendations.

9.1 Introduction

Para 9.1.3 should also reference the objectives of the Government's 25-Year Environment Plan and Biodiversity 2020, the England Biodiversity Strategy.

9.2 Protecting and enhancing local open space

We concur with the rationale described in the supporting paras.

- **GI1 Draft policy approach: *Green and blue spaces***

We welcome and support this policy approach. However, for clarity and consistency, green, blue and open space are used interchangeably, and it would be useful to define this. As open space can be 'grey' space (hard surfaced public realm), we suggest that the policy should either be titled 'Open space', or that first line is amended to:

"The Council will protect, and enhance the quality and improve access to green and blue space."

9.3 Green Belt and Metropolitan Open Land

We concur with the rationale described in the supporting paras 9.3.1 to 9.3.6. We remain concerned that if the existing Green Belt boundaries already meet NPPF criteria (paras 9.3.7, 9.3.8), then a review cannot be justified alone on a decision to release Green Belt for new development. The proposed review of Green Belt boundaries needs to consider the implications of potential release of GB other than simply meeting development targets (such as unintended environmental impacts on biodiversity and the ability to adapt to climate change).

- **GI2 Draft policy approach *Green and blue spaces***

We acknowledge the policy approach. We suggest that the policy is slightly amended to:

"The Council will protect the openness of Enfield's Green Belt and MOL and seek to enhance its quality and accessibility, by:

b) *Supporting development, which improves the quality of and access to Green Belt and MOL areas for beneficial uses such as biodiversity conservation, outdoor sport...*

9.4 Greening the borough

Para 9.4.2 We would argue it's "...increasing the number of appropriate trees..."

Para 9.4.4. Whilst we recognise that allotments can benefit biodiversity it depends on their size, location and crucially their management. Very intensely-managed allotments are not necessarily good for wildlife; the propensity at the moment is to maximise their use given the growing demand for food-growing.

Para 9.4.5 London Wildlife Trust published research with the GLA and Greenspace Information for Greater London (GiGL) in 2010 which highlighted approximately 3,000 ha of vegetated cover has been lost from London's gardens between 1998 and 2007, and if that the trend is set to continue without appropriate constraints London's gardens would effectively disappear by 2060.⁴

- **GI3 Draft policy approach: *Greening the borough***
We welcome and support the policy approach.

9.5 Biodiversity and Sites of Importance for Nature Conservation

Para 9.5.1 We would recommend that reference to biodiversity's intrinsic value is also referenced.

We recommend that an additional paragraph is added prior to 9.5.2 that sets out what biodiversity interest is in the borough which can then link to the Facts box. This should be along the lines of:

"Protection and enhancement of biodiversity is underpinned by a network of statutory and non-statutory wildlife sites throughout Enfield and in adjacent boroughs. These include a Site of Special Scientific Interest and 41 Sites of Importance for Nature Conservation (see Facts) within Enfield and close to internationally designated sites just outside. Other parks, greenspaces and gardens are also valuable for supporting biodiversity. In addition a large number of wildlife species present are legally protected or considered priorities for conservation, and are of material consideration in land use decisions."

The Chingford Reservoirs SSSI lies between two components of the Lee Valley Special Protection Area and Ramsar site, and close to the Epping Forest Special Area of Conservation.

The Trust has published *Spaces Wild* which sets out the system behind the notification of London's SINC's, their threats and their purposes.⁵

In para 9.5.2 we recommend that there is a statement to the effect that SINC data should be regularly reviewed in order to set the framework required under para 174 of the NPPF. Current criteria set out by the London Wildlife Sites Board is that boroughs should be reviewing SINC status and boundaries every five or so years, and certainly not more than 10 years to ensure that planning decisions are made on the best available data. In this respect, Greenspace information for Greater London (GiGL) is the authoritative source of data on London's natural environment, providing contextual services that informs the work of ecologists, park managers, and planners in many of the London boroughs.⁶ Becoming a partner in GiGL would provide access to these services for Enfield, and in doing so meet the Mayor's expectation set out in the London

⁴ Smith, C., et al (2010), *London Garden City; Investigating the changing anatomy of London's private gardens, and the scale of their loss*, London Wildlife Trust, Greenspace information for Greater London, and Greater London Authority.

See: [www.wildlondon.org.uk/sites/default/files/files/London%20Garden%20City%20-%20full%20report\(1\).pdf](http://www.wildlondon.org.uk/sites/default/files/files/London%20Garden%20City%20-%20full%20report(1).pdf)

⁵ Hallam, G. and Frith, M. (2015). *Spaces Wild; championing the values of London's wildlife sites*, London Wildlife Trust.

See: www.wildlondon.org.uk/news/2015/10/20/spaces-wild-critical-importance-protecting-london%E2%80%99s-wild-spaces

⁶ www.giql.org.uk/

Environment Strategy that all London boroughs and other major land managers should have an agreement with GiGL.

In para 9.5.3 we recommend that there is reference to securing biodiversity net gain through development, in line with the NPPF.

- **GI4 Draft policy approach: *Biodiversity and Sites of Importance for Nature Conservation.***

We welcome and support the policy approach. We recommend, however, that clause a) is strengthened to explicitly reference biodiversity net gain:

“New development should aim to incorporate opportunities to enhance biodiversity, wherever possible, and seek to secure net gain in biodiversity value. Adverse impacts on biodiversity that cannot be avoided or mitigated, should as a last resort be compensated through an appropriate offsetting metric.”

9.6 Blue Ribbon Network

We concur with the rationale described in the supporting paras.

- **GI5 Draft policy approach: *Blue Ribbon Network***

We welcome and support the policy approach.

9.7 Burial space and crematoriums

We concur with the rationale described in the supporting paras.

- **GI6 Draft policy approach: *Burial space and crematorium***

The Trust has experience of objecting to cemetery extensions that would, cause adverse impacts to biodiversity, and advising on planned interventions on existing cemeteries. We recommend that this policy should explicitly reference the need to avoid adverse environmental impacts:

“The Council will protect existing and support additional land to be used for burial space and crematoriums where:

- x) *there are no environmental impacts that cannot be effectively avoided or mitigated;*”

10. Sustainable movement and transport

We concur with the rationale described in the supporting paras, and support the draft policy approaches.

11. Sustainable infrastructure and environmental impact

11.1 Introduction

We concur with the benefits and challenges described in the supporting paras

11.2 Sustainable building

We concur with the benefits and challenges described in the supporting paras, and welcome the aims of the borough to address these.

- **SUS1 Draft policy approach: *Sustainable building***

We welcome and support the policy approach.

11.3 Sustainable living and working

We concur with the benefits and challenges described in the supporting paras, and welcome the aims of the borough to address these.

- **SUS2 Draft policy approach: *Sustainable living and working***
We welcome and support the policy approach.

11.4 Sustainable infrastructure

We concur with the benefits and challenges described in the supporting paras, and welcome the aims of the borough to address these.

- **SUS3 Draft policy approach: *Sustainable infrastructure***
We welcome and support the policy approach.

11.5 Water and flooding

We concur with the benefits and challenges described in the supporting paras, and welcome the aims of the borough to address these.

- **SUS4 Draft policy approach: *Minimising flood risk***
We welcome and support the policy approach.

11.6 Managing surface water

We concur with the benefits and challenges described in the supporting paras, and welcome the aims of the borough to address these.

- **SUS5 Draft policy approach: *Surface water management***
We welcome and support the policy approach.

If you want further clarification on any of these points please do not hesitate to contact me.

Yours sincerely,

Mathew Frith
Director of Conservation

From: Mark Furnish
To: [LocalPlan](#)
Subject: Towards a New Local Plan 2036 - Issues and Options
Date: 26 February 2019 18:01:27

Dear Sir/Madam,

Thank you for consulting Sport England on the Issues and Options document. Sport England has an established role within the planning system which includes providing advice and guidance on all relevant areas of national and local policy as well as supporting Local Authorities in developing their evidence base for sport.

Sport England aims to ensure positive planning for sport by enabling the right facilities to be provided in the right places based on robust and up-to-date assessments of need for all levels of sport and for all sectors of the community. To achieve this aim our planning objectives are to PROTECT sports facilities from loss as a result of redevelopment, ENHANCE existing facilities through improving their quality, accessibility and management and to PROVIDE new facilities that are fit for purpose and meet demands for participation now and in the future. You will also be aware that Sport England is a statutory consultee on planning applications affecting playing fields. Further detail on Sport England's role and objectives within the planning system can be found via the following link:

<https://www.sportengland.org/facilities-planning/planning-for-sport/aims-and-objectives/>

Sport England has reviewed the document in light of these planning objectives and national planning policy set out in the National Planning Policy Framework (NPPF) and does not consider that it complies with this policy framework. Sport England, therefore, does not consider its policies and supporting text are sound and **objects to the document**. These objections and other comments relating to the document are detailed out below:

2. Promoting good growth options in Enfield

Sport England supports that improving health and wellbeing of Enfield's population and supporting healthier lifestyle is included within the Local Plan's growth objectives. Tackling health inequalities and inactivity aligns not only with Sport England's Strategy, *Towards and Active Nation*, but also the Governments Strategy, *Sporting Future: A New Strategy for an Active Nation*. Sport and recreation is an important factor in improving, and maintaining, a healthy and active lifestyle.

In relation to the potential option for a strategic plan-led approach to the Green Belt suggested in 2.12, Sport England would highlight that the Green Belt has an important function for the delivery of sport, recreation and activity therefore the impact on the population's health should be fully considered when considering reducing the Green Belt. Sport England would object to any site allocations, policies or development that would result in the loss of, or prejudice the use of, sports facilities within the Green Belt.

4. Design Excellence

Sport England considers that the design of where communities live and work is key to keeping people active and placemaking should create environments that make the active choice the easy choice. Sport England along with Public Health England have launched our revised guidance, Active Design, which intends to inform the urban design of places, neighbourhoods, buildings, streets and active open spaces to promote sport and active lifestyles. The guide sets out ten principles to consider when designing places that would contribute to creating well designed healthy communities which has considerable synergy to the objectives and policies of the Issues and Options document (and therefore Local Plan), particularly in relation to encouraging healthy communities, co-location and active travel. Sport England recommend that these links between the Local Plan and Active Design are developed further and are really drawn out in by having clear references to Active Design, its principles and the Active Design Checklist within the Local Plan. Active Design principles and the submission of a completed Active Design checklist could, for example, be added to the design requirements in Policy D1 and in Policy SI2. More information on Active Design, including the guidance, can be found via the following link;

<http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/active-design/>

Sport England would happily advise further in relation to Active Design if required.

Sport England welcomes that the Council will adopt the agent of change principle however it is recommended that examples used in paragraph 4.4.3 (noise and smells) are expanded to highlight the potential issue of ball-strike from sports facilities. Residential development is often located next to sports facilities, such as playing fields with cricket pitches, and if the appropriate mitigation against the risk of ball strike does not form part of the new development the play on the playing field could detrimentally affected.

6. Promoting a competitive economy

The employment policies and supporting text appears to focus on office, industrial, knowledge and technological employment however sport makes a huge contribution to the lives of individuals, to the economy and to society. Sport England has undertaken research to examine the economic value of sport in England. The main conclusions are:

In 2010, sport and sport-related activity generated Gross Value Added (GVA) of £20.3 billion – 1.9% of the total GVA in England. This placed sport within the top 15 industry sectors in England and higher than sale and repair of motor vehicles, insurance, telecoms services, legal services and accounting (*Economic value of sport in England June 2013 published by Sport England). Sport and sport-related activity is estimated to support over 400,000 full-time equivalent jobs – 2.3% of all jobs in England.

Sport also generates a range of wider benefits, both for individuals and society:

- The benefits of playing sport include the well-being/happiness of individuals taking part, improved health and education, a reduction in youth crime, environmental benefits, stimulating regeneration and community development, and benefits to the individual and wider society through volunteering.
- Consumption of sport benefits include the well-being/happiness of spectators, and the national pride/feel good factor through sporting success/achievement.
- The economic value of sport in terms of health and volunteering in England is estimated in 2011-2012 to have been £2.7 billion per annum for volunteering and £11.2 billion per annum for health.

Traditional forms of employment have been changing in the last 100 years, unfortunately the perception of what employment land is, has not. The introduction of B8 distribution challenged local authorities in the 80's and '90s as more of these uses came forward. Sport is often overlooked as an employer.

It is Sport England's contention that Enfield should consider D2 sports uses; fitness clubs, gyms, climbing centres and five aside centres, to be acceptable on employment sites, as they do create sustainable employment opportunities and provide work experience and qualifications. When sports facilities are designed in as part of an employment part e.g. Wolverhampton Business Park or Harwell Science Park, it creates a better and more sustainable working environment and therefore an attractive area for business to locate in or relocate to. Furthermore, it should not be overlooked that there are usually more employment opportunities generated through a commercial gym, e.g. David Lloyd Gyms, or commercial football, e.g. Football First, or a gymnastics club (D2 uses), than a 500,000m² B8 use.

Sport England therefore recommends that sport and recreation facilities are considered in employment areas which could complement the more traditional 'employment uses' or create more employment opportunities.

7. Planning for vibrant town centres

Sport England welcomes that paragraph 7.2.9 acknowledges that sport uses can, and will, make an important contribution to the health and vibrancy of town centres and advocates the relaxation of general guidelines for A1 uses. This would enable sport and leisure facilities to be located in areas where they are needed. As a result, Sport England supports that Policy TC2 would facilitate such uses within town centres and also seeks to improve town centre's impact on health and wellbeing, which has parallels with some Active Design principles.

8. Community and social infrastructure.

- Sport England objects to how indoor and outdoor sport facilities are addressed within the document. Sports facilities appear to be spread over three policies (and two chapters) and is not overly clear. The Council have a Playing Pitch Strategy (PPS) which is mentioned in paragraph 9.27 but not within the section that appears predominately address sport (8.3). There is limited discussion about sport and recreation facilities and the conclusions of any robust assessments and what any strategy is advising to meet current and future sporting needs in the document.

The Local Plan should be informed by the Council's PPS which highlights key issues with outdoor sports provision and how it should be addressed. These recommendations and actions should then form a single policy that addresses outdoor sport provision that seeks to protect existing facilities, enhance existing facilities and provide new facilities in line with robustly identified needs. Similarly, another policy should address indoor/built sport facilities. The limitations of spreading sport facilities throughout a number of policies and including them within wider definitions such as open space and community facilities means the policies do not consider the nuances of sport facility provision and does not give the adequate protection against their loss to another form of community facility or a more general open space.

The policies within the Issues and Options document do not set out clear vision for sport and recreation facilities, including what is required and where to meet needs nor does it provide adequate protection. In this respect, the policies allow for the loss of sport facilities, including playing field, if a local need cannot be demonstrated which is a lower threshold than identifying a surplus of provision. The Policies also allow for the loss of facilities if it has been marketed for over 12 months or unsuitable in size and scale for its location. This does not align with the NPPF, paragraph 97 or Sport England's Playing Field Policy, that only allows the loss of sports facilities, including playing field, if there is a robustly identified surplus, it is being replaced by another facility of at least equivalent quality, quantity and accessibility, or for another sports facility the benefits of which outweigh the loss or it is for ancillary facilities. This is different to merely taking into consideration suitability, viability and unsuccessful marketing. The Council's current approach, therefore, is not consistent with national policy, justified by its evidence base or effective.

Sport England is also concerned to the reference to 'playing pitches' throughout the document. Although playing pitches are key to sport it is entire playing field (which is made up of a pitch or a number of pitches) that requires protection in the NPPF and the Councils' PPS. The reference to 'playing pitches' should therefore be amended to 'playing fields'.

Sport England does, however, welcome that the Council will seek organisations to enter into Community Use Agreements as stated in paragraph 9.2.4 as this would allow the community greater access to sports facilities. Sport England have a template that can be forwarded to help applicants/developers if required.

10 Sustainable movement and transport

Sport England welcome the chapters stance of supporting walking and cycling, ie. Active Travel modes, as this can be an important way that a community can create, and maintain, an active and healthy lifestyle.

Conclusion

Sport England does not consider that the issues and options document is fully informed by up-to-date and robust assessments and strategies for indoor and outdoor sport and is, therefore, not informed by strategically identified demands and needs despite the Council having developed a PPS. In addition,

polices intended to plan for sport do not have the protection required by the NPPF, paragraph 97, and are not considered effective to adequately plan for indoor and outdoor sports facilities. As a result they do not align with Sport England's Planning Policy or the NPPF. Sport England, therefore, does not consider that the plan is positively prepared, effective or consistent with National Policy.

Sport England advises addressing these issues by creating a policy for indoor sports facilities and another for outdoor sports facilities taking into account the NPPF, paragraphs 96 and 97, Sport England's Planning Policy and the Council PPS. The Council should also develop a indoor/built sport facility strategy to address these facilities.

In addition, in light of the Council's objective to encourage healthy communities Sport England recommended imbedding Active Design within the design policies and also allow a sufficient degree of flexibility within employment areas to accommodate sport and leisure facilities.

Sport England would be happy to work alongside the Council to develop any policy and answer any queries in relation to the above.

If you have any questions please do not hesitate to contact the above.

Yours sincerely

Mark Furnish

Planning Manager

Sport England



This girl can



1st Floor, 21 Bloomsbury Street, London, WC1B 3HF



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From: michael priaulx
To: [LocalPlan](#)
Cc: [Edward Mayer](#)
Subject: Enfield Local Plan consultation: section 9.5.
Date: 26 February 2019 13:11:16

Dear Enfield Local Plan consultation,

Please find below the response to this consultation from Swift Conservation (www.swift-conservation.org), we are a national wildlife conservation organisation.

With regard to section 9.5 Biodiversity and Sites of Importance for Nature Conservation (pages 169-170):

Swift Conservation would like to see the beneficial species which make up our potentially rich urban biodiversity, and rely on buildings for their survival, to be given higher priority, as these species are becoming seriously endangered in the Borough and the UK as buildings are refurbished and demolished and their habitat is lost without replacement.

In particular swifts, house sparrows and starlings, whose numbers have all dropped by 50% or more in the last 20 years, and also bats who are also threatened in many areas.

Creating new nesting and roosting sites is straightforward, as integrated nest and roost bricks have been proven to be effective and are cheap, almost invisible, easy to install and involve zero maintenance.

We would like to see these integrated bricks installed in all new developments that are suitable,

together with an emphasis on providing street shade trees, "green" walls, "green" roofs, and also a move towards sustainable urban drainage systems and rainwater harvesting to relieve the "hardening" of the London landscape by the covering over of front and rear gardens to provide parking, barbecue areas etc. This is directing rainwater straight to the sewers where it has the potential to cause flooding, while the associated drying out of the areas around dwellings is provoking subsidence, and altogether it is denying plants and trees the water they need to survive.

Stand-alone combined swifts nest and bat roost towers are now available which are no larger than a mobile phone mast or lamp post, and we would like to see these installed for all major projects.

We would also like to see ecological surveys becoming mandatory for building works in areas known to support the key species mentioned above, and appropriate protection measures taken following the project ecologist's recommendations.

Yours sincerely,

Michael Priaulx, Edward Mayer

On behalf of Swift Conservation

Email: mail@swift-conservation.org

Website: www.swift-conservation.org