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Edmonton Leaside Area Action Plan
Examination

Department: Planning

Our reference: LDF17/LDD18/CG02
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Email:

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Dear Jacqui

**Planning and Compulsory Purchase Act 2004 (as amended);
Greater London Authority Acts 1999 and 2007;
Town and Country Planning (Local Development) (England) Regulations 2012**

RE: Edmonton Leaside Area Action Plan – Schedule of Proposed Main Modifications

Thank you for consulting the Mayor of London on the Schedule of Proposed Main Modifications to the Edmonton Leaside Area Action Plan (ELAAP) following the Examination Hearing sessions. As you are aware, all development plan documents must be in general conformity with the London Plan under section 24 (1)(b) of the Planning and Compulsory Purchase Act 2004. The Mayor provided comments on the Submission version of the ELAAP on 07 July 2017 (reference: D&P/LDF10/LDD18/MJ01) and responded to the Inspectors questions as part of the Examination on 18th September 2018 (reference: LDF10/LDD18CG). In addition, officers made representations at the hearing sessions.

The Mayor has afforded me delegated authority to make more detailed comments on his behalf as set out below. Representations from Transport for London (TfL), which I endorse, are included within this response.

General comment

As set out in the Mayor's submission prior to the hearing sessions, the Mayor published his draft London Plan for consultation on 1st December 2017 and the Minor Suggested Changes (following consultation) on 13 August 2018. The Examination in Public hearing sessions of the Draft London Plan have now ended, and publication of the Panel's report is anticipated in early Autumn 2019 with publication of the finalised new London Plan expected in Winter 2019/20. Once published, the new London Plan will form part of the Enfield Development Plan and will contain the most up-to-date policies.

The Mayor has carefully considered the proposed main modifications and recognises that the suggested amendments conform with the current London Plan and also bring it in line with Enfield's Core Strategy, which was formally adopted in 2010. This means that the Edmonton

Leaside Area Action Plan will become out of date once the Draft New London Plan is finalised and formally published in the coming months. The two key issues regarding non-conformity with the Draft New London Plan relate to ELAAP's approach towards both affordable housing and the strategic approach to industrial land and floorspace. In addition, the proposed overall strategic approach remains one which is not based on up-to-date evidence.

While the modifications are a welcome move in the right direction, especially the intention to retain industrial land within SIL, the underlying approach still doesn't account for the far stronger emphasis on the necessary protection of the capital's industrial land, and the introduction of the threshold approach to affordable housing as set out in the Draft New London Plan.

As currently drafted, the ELAAP does not recognise that industrial land uses are typified by lower job densities and does not make the clear distinction between SIL, LSIS and non-designated industrial land by reflecting the approach set out in the Draft New London Plan Policy E7 or the [Practice Note on Industrial intensification and co-location through plan-led and masterplan approaches \(November 2018\)](#).

The ELAAP does not have to be in conformity with the Draft New London Plan, yet as part of the ongoing review of its Local Plan the Mayor would expect Enfield to update ELAAP, where not superseded by the Local Plan, at the earliest possible convenience, taking into account up-to-date local evidence and the New London Plan (once formally finalised and published). The Mayor is happy to work with Enfield to offer support and guidance to address some of the issues identified in this response.

Detailed comments on the proposed main modifications to the Edmonton Leaside Area Action Plan are set out in the table below.

Responses to proposed main modifications

Edmonton Leaside Area Action Plan

Main Modifications

Modification	Policy / Paragraph	GLA position
<p>Since the ELAAP examination hearings in 2018 the Draft New London Plan has progressed through examination hearings and has since then gained more weight as a material consideration in plan preparation and decision making. In addition, Further Suggested Changes resulted as part of the Mayor’s Matter Statement on various topics and formed the basis of discussion during the London Plan hearing sessions.</p>		
MM1.	Chapter 5 Policy EL1: Housing in Meridian Water	<p>It is recognised that the modifications include an increase in the proposed level of affordable housing reflecting Enfield’s Core Strategy policy and Enfield’s Strategic Housing Market Assessment from 2015. However, the proposed approach does not appear to follow the threshold approach as set out in Draft New London Plan Policy H6 which seeks to optimise affordable housing delivery by realising the difference in values between industrial and residential development. In addition, it should be noted that the Mayor is applying the threshold approach to referable planning applications, setting the threshold at 50% where proposals would result in the loss of industrial floorspace capacity.</p>
MM2a.	Chapter 5, paragraph 5.4.10-5.4.13	<p>The Mayor welcomes that Enfield has reviewed its approach to Strategic Industrial Land and is now proposing to retain it rather than seeking its release.</p> <p>For its Local Plan Enfield, will have to recognise it is a ‘provide capacity’ borough as set out in Table 6.2 of the Draft New London Plan. The regeneration of Meridian Water provides an excellent opportunity for Enfield to investigate how it might make the best use of its land through the intensification of its industrial floorspace capacity.</p> <p>The paragraphs as amended do not recognise that industrial uses, mostly driven by a strong demand for logistics to service growth in London’s economy, are typified by lower job densities and therefore the proposed wording encouraging higher density jobs does not favour industrial floorspace retention or intensification. Seeking higher job densities should therefore only apply to identified non-industrial land and this should be made clear in the interests of applying, as a minimum, the principle of no net loss of industrial floorspace capacity.</p> <p>The introduction of higher density job spaces, such as office space should be directed towards the borough’s town centres in accordance with Draft New London Plan Policy E1. Furthermore, it should be noted that the London Office Policy Review 2017 identified Enfield as having a small and insignificant office market which is unlikely to change unless the Council create the conditions and climate for this to happen.</p>

MM5.	Chapter 5, Policy EL5	<p>The text should be amended to read:</p> <p>Meeting the need for outdoor sports pitches through off-site provision should be fully considered. Outdoor sports pitches must be provided in immediate proximity to the school where possible, while any off-site provision must be conveniently and safely accessible. School sports pitches will be made available, out-of-hours, to the local and wider community at affordable rates in accordance with New London Plan paragraphs 5.1.8A and 5.3.12.</p> <p>Justification: The suggested changes are supported by Draft New London Plan Good Growth Policies GG2 making the best use of land and Policy GG3 creating a healthy city.</p>
MM19.	Chapter 10, Policy EL19	<p>The text should be amended to read:</p> <p>The Council will continue to work with the Lee Valley Regional Park Authority to help deliver its Park Development Framework, and to identify the priority mix of additional recreation and leisure facilities at Picketts Lock. Picketts Lock is identified to deliver a large significant new development that will provide a destination attraction for Edmonton Leaside and beyond. Picketts Lock is considered suitable for a potential range of new and improved leisure, sport and recreation uses, including a health and fitness centre, 5-a-side football pitches, a snowdome, an ice rink, conference/exhibition spaces, self-catering accommodation, a hotel and commercial ten-pin bowling in accordance with paragraph 146 of the National Planning Policy Framework.</p> <p>Development proposals must have appropriate regard to Picketts Lock’s designation as a Major Developed Site in the Green Belt. In particular this means they must be in conformity with national Green Belt policy, including in terms of ensuring no net loss of site Green Belt openness.</p> <p>Development proposals must also demonstrate that they: ...</p> <p>Justification: The Draft New London Plan is clear that the de-designation of the Green Belt will not be supported but where it is considered appropriate the Mayor will support its extension. Guidance set out in the NPPF should be followed and it should be recognised that the proposed principle of ‘no net loss’ of Green Belt is not considered to be an acceptable approach. The Green Belt provides many important functions including those for the needs of biodiversity and therefore the protection of the Green Belt is not purely about maintaining a quantum. Outdoor sport and recreation facilities may be acceptable in the Green Belt whereas conference/exhibition space, self-catering accommodation, hotel development and indoor ten-pin bowling are not. See paragraph 145 of the NPPF.</p>
MM19a	. Chapter 10. 10.1.1	<p>The text should be amended to read:</p>

National policy on development within the Green Belt is set out in the NPPF **and the protection of London's Green Belt has been strengthened in the New London Plan as set out in Policy G2.** ~~It states that local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access, to provide opportunities for outdoor sport and recreation, to retain and enhance landscapes, visual amenity and biodiversity, or to improve damaged and derelict land. It also requires local planning authorities to ensure that substantial weight is given to any harm to the Green Belt in cases where new development may be proposed within it. The 'very special circumstances' under which development may be consented will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.~~

~~While the construction of new buildings is regarded as inappropriate in the Green Belt, provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport and outdoor recreation are an exception to this, as long as they preserve the openness of the Green Belt and do not conflict with the purposes of including land within it.~~

~~Further exceptions potentially relevant for any development at Pickett's Lock include:~~

- ~~• the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;~~
- ~~• the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;~~
- ~~• limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt than the existing development;~~
- ~~• local transport infrastructure which can demonstrate a requirement for a Green Belt location; or~~
- ~~• the re-use of buildings provided that the buildings are of permanent and substantial construction.~~

~~Proposals for development at Pickett's Lock must also have appropriate regard to Enfield Development Management Document Policy DMD89 Previously Developed Sites in the Green Belt, which states that complete or partial redevelopment of the Pickett's Lock site will only be permitted where the proposal improves the character and appearance of the site and appearance from the surrounding Green Belt and that new development must not have a greater impact on the openness of the Green Belt than the existing development.~~

The principle of developing Pickett's Lock as an area for the development of additional sports and recreation facilities is supported by Core Strategy Policy 33. Any development coming forward must be considered in the context of the Green...

Justification:

		ELAAP should not simply 'cherry-pick' elements of national green belt policy which it considers favourably but should refer to the national approach in its entirety. Reference to specific elements of it could lead to confusion, misinterpretation and challenge.
MM2a	Chapter 5, Paragraph 5.4.19	The Mayor notes the bus garage would remain in situ as protected land use within Strategic Industrial Land. It is recognised within the adopted London Plan and emerging London Plan, the importance of safeguarding land for transport, which includes planning of noise sensitive uses next to operational transport land such as the Arriva Bus Garage within the AAP area.
MM7	Chapter 5, Policy EL7, Chapter 5, paragraph 5.8.17	Noted, and welcomed.
MM17a	Chapter 8, Section 8.3 title and Paragraph 8.3.1	The changes here are noted.
MM22a	Chapter 11, policy EL22	Welcome the inclusion of the Mayor's Healthy Streets approach
MM22a	Chapter 11, paragraph 11.4.8	Noted. The proposed changes are acceptable. The Mayor will expect cycle provision that exceeds the minimum standards in the London Plan. Cycle parking should be designed in line with London Cycle Design Standards.
MM22a	Chapter 11, Policy EL23	Noted
MM29	Chapter 14, paragraph 14.5.2	Note comments on pooled contributions. Bus contributions will be required to support growth envisaged in AAP. TfL will provide advice related to the needs of relevant development proposals, and will work within planning rules for planning gain.
MM29	Chapter 14, Table 14.1	Welcome the changes relevant to transport clauses set out here.

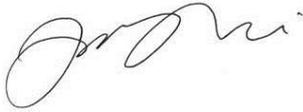
Additional modifications

AM5	Chapter 1, paragraph 1.1.4	Welcome these changes made.
AM7	Chapter 1, paragraph 1.1.5	Welcome changes made to reflect importance of bus, walking and cycle provision.
AM13	Chapter 1, Objective 1	Welcome changes made.

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If you would like to discuss any of my representations in more detail, please contact Celeste Giusti (020 7983 4811) who will be happy to discuss any of the comments.

Yours sincerely



Juliemma McLoughlin
Chief Planner

Cc: Joanne McCartney, London Assembly Constituency Member
Andrew Boff, Chair of London Assembly Planning Committee
National Planning Casework Unit, DCLG
Lucinda Turner, TfL