

Enfield

Towards a New Local
Plan 2036

Issues and Options



Public Consultation (Regulation 18)
December 2018
www.enfield.gov.uk/newlocalplan

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Foreword

Over the last two decades, the London borough of Enfield has changed tremendously. Significant areas have been regenerated and Enfield is a place that is successful in attracting new residents, jobs, investment and visitors.

Enfield is now set to go through a period of even more rapid growth, change and development. We need to proactively manage the investment being made in the borough ensure that it results in the delivery of the significant amount of housing, supporting community infrastructure, and jobs that local people need and in economic growth, which allows local businesses to thrive. We want sustainable growth to 2036 to deliver a place in which people are proud to stay, live, work and visit. Enfield's new Local Plan will provide the planning framework against which aspirations of the Council, local people and other partners can be delivered.

We also need to look ahead at the potential of securing a Crossrail 2 route in Enfield. Crossrail 2 would run through our eastern corridor and include early Four Tracking of the West Anglia Mainline and branch to New Southgate. Crossrail 2 has the potential to unlock additional new opportunities to deliver much-needed new homes, jobs and economic growth in the borough.

The Council's emerging growth vision is to deliver transformational change, unlocked through strategic infrastructure investments. The key aim is to reduce inequality to regenerate deprived neighbourhoods for the benefit of local residents, to promote development along key growth corridors and to enhance the borough's rich resource of green and blue infrastructure - which includes our parks, river valleys, gardens, street trees, canals and more.

Growth options towards delivering this vision include: directing investment and growth to our town centres and areas around stations; exploiting opportunities around transport corridors; optimising the Council's land portfolio for new development including our estate renewal and regeneration programmes; proactively managing and optimising low density industrial and other land in the eastern corridor, and a strategic approach to the borough's Green Belt.

Combinations of some or potentially all of these options will need to be explored to deliver successful thriving places with a range of housing, schools and health facilities, open spaces and a dynamic economy, and to ensure the positive benefits of regeneration and investment reach all residents of the borough.

We are working hard to improve living standards, make Enfield safer, cleaner and greener, support residents to be healthier and happier, and provide more opportunities to learn and work, and stay in the borough. The new Local Plan aims to make this happen, by giving clear guidance; such as what can be built, where, how, for what use, where restrictions apply and why.

The Council is committed to providing a high quality, responsive Local Plan and knows how important it is to involve the community in helping us create a better Enfield.

Following previous public consultation in 2015, this Issues and Options consultation is the first of two formal stages to be consulted on as part of the new Local Plan. We encourage you to take this opportunity to participate in the process of shaping the future growth of the borough and the policies within the Plan. Further opportunities for public consultation will follow before we aim for the Local Plan to be adopted in 2021.



Councillor Ahmet Oykenor

Cabinet Member of Property and Assets



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1 Introduction

1.1 Background

- 1.1.1 The Council's Core Strategy was adopted in 2010. It has successfully managed the significant change the borough has experienced since then by guiding the location, type, scale and design of new development. We now need a new Local Plan to respond to new opportunities and pressures. Our key challenges include a rapidly rising population, housing growth, which has not kept up with demand, the changing nature of retail and our town centres. The Plan has the opportunity to boost economic growth and maximise the benefits of strategic infrastructure projects and other social and community infrastructure for residents and businesses in the borough.
- 1.1.2 The new Local Plan also needs to address changes resulting from new national legislation and reform through the Localism Act (2011), new National Planning Policy Framework (NPPF) (2018) and from the Mayor's draft new London Plan (2017).
- 1.1.3 The Council has started work on a new Local Plan so that we can start planning for **good growth** up to the period between 2018 to 2036 - this is growth which really delivers what local people want and need. The Plan also sets out the Council's vision, what the borough will look like in 2036 and the policies which will deliver this change should key strategic infrastructure projects such as Crossrail 2 be confirmed.
- 1.1.4 The need to deliver for an ever-increasing population and the amount and kind of growth needed will challenge our thinking beyond any plans we have seen in Enfield before – much like other London boroughs who are in the same position. We are being asked by the Mayor of London to provide a much more substantial amount of housing each year than we currently do, in order to meet local need. Accordingly, we will have to make available land work harder, identify new sources of land and lobby the government to secure the physical and social infrastructure needed to support new communities and regenerate existing ones.
- 1.1.5 Without a realistic plan for accommodating projected growth, more and more households will be left homeless or in overcrowded, overpriced and low-quality homes without proper access to a healthy environment and necessary services. Inequalities in the borough will continue and worsen. The nature, scale and location of the growth that would take place would be largely decided in line with developers' priorities, rather than by those of residents. The Council wants growth in the borough to be an opportunity for benefits to all existing and future residents.
- 1.1.6 Our statutory obligation is to look at a 15-year time horizon and take account of longer term requirements. The Plan will be a positive strategy for delivering sustainable development and delivering the Council's priorities for growth.
- 1.1.7 While facilitating development, the new Local Plan will also safeguard and enhance what is good and special about Enfield – its culture, community heritage and character, open space, quality parks, schools, neighbourhood character and thriving small businesses.

The London Plan defines Good Growth as: “working to re-balance development in London towards more genuinely affordable homes for working Londoners to buy and rent. And it’s about delivering a more socially integrated and sustainable city, where people have more of a say and growth brings the best out of existing places while providing new opportunities to communities”.

“Good Growth is not about supporting growth at any cost... Instead, what we need is growth that allows us to build thousands of genuinely affordable homes at the same time as creating a more inclusive, greener and safer city that supports the health and wellbeing of all Londoners”.

1.2 This consultation

Within our timetable for public consultation, we have ensured that there is enough time to engage meaningfully with residents, businesses and other stakeholders on the new Local Plan. We want to use the consultation process at different stages of the Local Plan process to test our approach with you to ensure the Plan is right. **This plan is not the final word.** Detailed policies to bring forward good growth, in line with the Issues and Options identified, still need to be drafted, but before this happens, we need to get the overall approach right in a way which maximises the benefits of new development for everyone.

This is your chance to help the Council do that.

- 1.2.1 The new Local Plan will affect decisions in places where you live, work, shop and spend your leisure time. At this stage, we need to be sure that we have captured and understood the main issues and options facing the borough so that our new Local Plan can address them. Using the responses to this consultation, and information gathered from our evidence base, we will finalise the list of issues that the new Local Plan will cover and the options we need to take forward in the draft Local Plan to be published for consultation in 2019.
- 1.2.2 We have aimed to explain the information in this document clearly, but we sometimes have to use technical wording. For this reason we provided fact boxes within each chapter, where relevant.

Have your say...

- 1.2.3 We are very interested to receive your comments on the challenges, opportunities, approaches and suggestions on the future of the borough as set out in this consultation draft Plan. There are a number of ways you can respond to this document. The quickest way to respond is online using enfield.gov.uk/plan1. Here you can also read the summary consultation paper.
- 1.2.4 You can email us at: localplan@enfield.gov.uk
- 1.2.5 If you do not have internet access, this report alongside a summary version and questionnaire are available to read as a paper copy in the Civic Centre, the Dugdale Centre, Communities House and in all the borough's libraries. You can complete the questionnaire and return to:

Strategic Planning and Design

Enfield Council

FREEPOST

NW5036

EN1 3BR

- 1.2.6 Alternatively, hard copies of this draft Local Plan can be made available on request by contacting the Strategic Planning and Design team by telephone on **020 8379 3866** or via email or by post (see above).

The deadline for all responses is 5pm on Thursday 28th February 2019.

- 1.2.7 Responses received after the deadline can only be accepted in exceptional circumstances. If you use the Council's online consultation portal, you will receive an automatic message to confirm receipt of your response and you can also view all comments that have been made.
- 1.2.8 Representations cannot be made anonymously, so please provide your full name and contact details. Please note that representations will be made publicly available, along with your name.

1.3 How to find out more

- 1.3.1 Visit our website: www.enfield.gov.uk/newlocalplan
- 1.3.2 Visit our dedicated digital engagement platform: enfield.gov.uk/plan1
- 1.3.3 If you have any questions or experience any difficulty in submitting your comments, please contact us via email: localplan@enfield.gov.uk or by telephone on **020 8379 3866**

Drop in to a public exhibition or we can meet with you

- 1.3.4 As part of the consultation we want to meet with you to discuss the contents of this document and any other Local Plan matters you wish to draw our attention to. We will be holding a number of drop-in sessions in the borough to enable local people to discuss proposals and provide their views in person. To find out about when these are happening please visit: www.enfield.gov.uk/newlocalplan or www.enfield.gov.uk/plan1
- 1.3.5 We would also welcome meeting local residents associations, community groups and local ward forums; as well as meeting with other stakeholders. If you would like to take this opportunity to meet us, please get in touch via email: localplan@enfield.gov.uk or by telephone on **020 8379 3866**.

1.4 What happens next?

- 1.4.1 The Local Plan process will include two consultations; the first is this one on Issues and Options, and the second will be on the preferred option Local Plan.
- 1.4.2 Once consultation on this Plan has finished, the Council will consider all the comments received and use them to refine the options. A summary of responses will be published detailing the feedback received and responses to these comments. This response will explain how comments received during the public consultation have been considered in the production of next draft Local Plan. Comments received cannot be treated as confidential.
- 1.4.3 The consultation report will be published on the Council’s website in 2019. Following consultation, we will then draft the Local Plan setting out detailed policies, which will be subject to a further round of consultation in 2019. The Local Plan will then be submitted to the Secretary of State for an independent examination, before the Planning Inspectorate in 2020. The aim is then to adopt the Local Plan in 2021.

If you would like to read this consultation document in a different format, such as large print, please email us at:

localplan@enfield.gov.uk





1.5 The Local Plan’s relationship with other policies and strategies

- 1.5.1 The new Local Plan, once adopted, will replace the existing Core Strategy (2010) and Development Management Document (2013) in a single new Local Plan document. A number of existing policies will need to be amended, or replaced by those in the new Local Plan.
- 1.5.2 The policies in the new Local Plan will closely relate to the Council’s housing and regeneration strategies and the priorities its Corporate Plan (2018-2022). Policies will also reflect effective co-operation that has taken place with strategic partners such as the Mayor of London, Greater London Authority (GLA), Transport for London (TfL), Network Rail, London-Stansted-Cambridge Consortium (LSCC), neighbouring boroughs and the Clinical Commissioning Group (CCG) on cross-boundary issues.

National Policy and the London Plan

- 1.5.3 The new Local Plan must be consistent with national policy, produced by the government in the form of the National Planning Policy Framework (NPPF), supporting Guidance Notes and Circulars. The Local Plan also needs to be in general conformity with regional guidance and policies produced by the Mayor of London and set out in the London Plan and relevant Supplementary Planning Guidance (SPG).
- 1.5.4 National and London Policy is continually being produced and updated. As new policies emerge, the Local Plan will need to take account of them.

1.6 Enfield’s new Local Plan 2036

- 1.6.1 This consultation wants to prompt an informed two-way conversation so that all those interested have an opportunity to help shape the future of the borough. The new Local Plan’s messages are about:
 - Setting a long-term vision and objectives that residents and business sign-up to;
 - Accommodating good growth;
 - Delivering more affordable and new homes;
 - Meeting the borough’s and where necessary London’s needs;
 - Securing and supporting new inward investment that helps to deliver a step-change in our traditional local economy, to bring not only higher value jobs, but also well-paid ones, and better prospects for our most vulnerable communities;
 - Tackling inequalities particularly in terms of health, life expectancy and life changes and addressing disadvantage in our borough;
 - Ensuring easy access to health, education and training provisions for all; and
 - Managing significant change whilst protecting and enhancing the borough’s heritage and natural environment.
- 1.6.2 The Plan identifies the different places and ways in which change and development could be accommodated and used to enhance the local environment.

This Plan is not the final word. Detailed policies to implement proposals still need to be drafted, but before this happens, we need to get the overall approach right by deciding on the preferred growth option, based on the issues and options for growth set out in this draft Plan. **This is your chance to help the Council do that.**

Meanwhile, the current Core Strategy and the Development Management Plan will continue to apply until Local Plan policies are adopted following consultation and independent examination.

Current London Plan (2016)



798
new homes per year
(2011-31)

Draft new London Plan (2017)



1,876
new homes per year
(2016-41)

National Planning Policy Framework (2018)



3,500
new homes per year
(objectively assessed
need)

Figure 1.1: Housing growth projections - current compared draft new London Plan and government's objectively assessed need

1.7 Why a new Local Plan?

1.7.1 Enfield's existing Local Plan comprises a number of documents that have been produced by the Council, the relationship of each component document is set out in Figure 1.1, to the right. The Core Strategy which, set out the previous vision, strategic objectives and high-level policies for Enfield was consistent with the London Plan (2008) with a housing target equating to 395 dwellings per annum. Since then, London's population has continued to grow tremendously, and the borough has changed. The London Plan adopted in 2011 and consolidated with alterations in 2016, significantly increased the Enfield's housing targets from 560 to 798 dwellings per annum.

1.7.2 The Mayor's latest draft new London Plan (2017), again proposes substantial increases to keep up with need; a target which is equivalent to 1,876 dwellings per annum from 2019/20 until 2028/29. In addition, the draft new London Plan identifies the borough as a key location for Strategic Industrial Land (SIL) provision, which needs to retain its current stock of industrial land and provide further additional industrial floorspace capacity to support London's industrial economy over the next London Plan period.

1.7.3 Through the successful delivery of our existing Local Development Plan and strategic growth areas, the Council has been able to accommodate the 2016 London Plan's more recent increases to 798 dwellings per year in the short-term. It cannot continue to do so for the longer term, particularly with increasing London Plan targets and without a new Local Plan which considers where this additional growth in the borough should go. Projections suggest that by 2036 Enfield's population is likely to rise to around 390,000. To accommodate this will require new homes, jobs and associated improvements to community and physical infrastructure to meet existing and new residents' needs.

1.7.4 Enfield's new Local Plan will need to consider future development needs in light of London's growing population. Where necessary, the Council will have to review and update current planning policies to facilitate and accommodate good growth and will move at pace to adopt the new Local Plan by 2021.

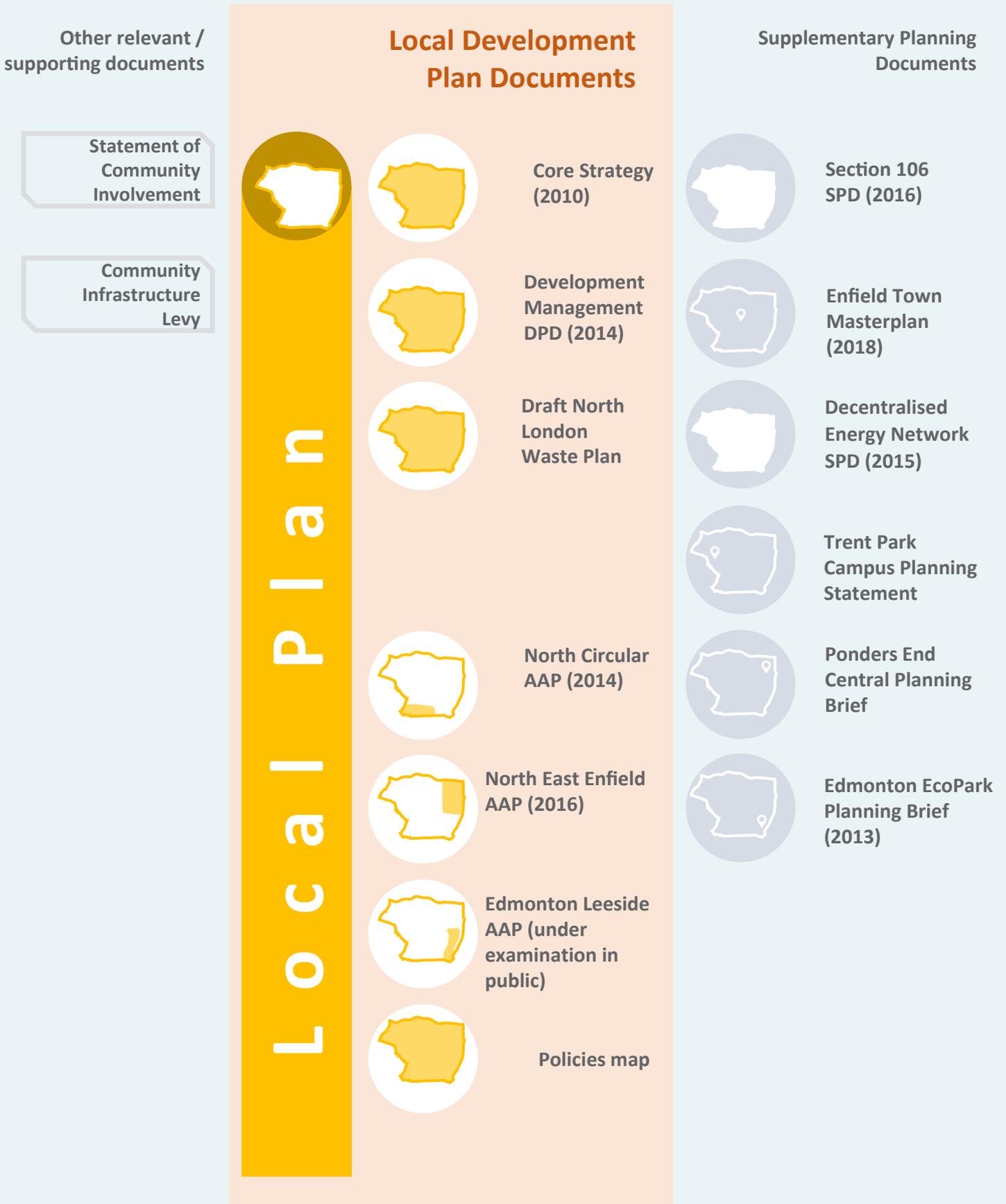


Figure 1.2: Enfield's Local Plan relationship of component documents

1.8 Community involvement in the new Local Plan

1.8.1 The Council has already undertaken public engagement with local communities, residents' groups, Council services, partner organisations, developers, housing associations, landowners, younger, older and disabled people and community forums in 2015 (see [Consultation Statement](#)). This has highlighted some of the challenges and opportunities the borough faces, sought feedback on these and potential options to address them.

The Enfield Conversation in 2017

1.8.2 The Council undertook a new initiative to promote and raise issues of growth with residents to test and challenge attitudes and assumptions about new housing and infrastructure via 'The Enfield Conversation'. Five pilot resident workshops were undertaken in September and November of 2017 with approximately 50 attendees at each. The workshops asked respondents to consider a number of defined options and trade-offs which would then help to identify their priorities. The key message was that difficult choices and trade-offs were necessary to deliver the number of homes, jobs and infrastructure the borough will need.

1.8.3 Resident consensus was for delivering a higher number of homes if this resulted in the right kind of homes built and in particular in more affordable homes. Building homes in the Lee Valley Corridor was the most popular new home area overall. Town centres, the A10 corridor and Council estates were the next most popular areas. Residents living in densely populated parts of the borough particularly supported the principle of development around town centres and areas within the Green Belt.

1.8.4 The Council is now setting out preferred strategic policy moves to address new challenges as well as benefit from opportunities.



Call for Sites 2018

1.8.5 At this stage in the plan-making process the Council is undertaking a ‘Call for Sites’ inviting anyone with an interest in land, potential sites and broad locations for development to submit these to us for consideration. We especially want proposals to come forward for small and medium sites for housing particularly in the built-up areas of Enfield. For such brownfield sites the Council not only wants to be able to identify the land or buildings themselves, we also want to be able to understand the schemes that are being proposed. This will help us to assess the capacity and deliverability of such sites, and whether they are available, suitable and viable. These sites will then be assessed and if deliverable will be consulted upon in the next stage of the Local Plan. The Council also need to be proactive in identifying sites within the existing built-up area which may have the potential to deliver new homes. The sites identified through the Call for Sites and by the Council will then need to be assessed for their suitability and viability to be developed and delivered as new homes. This will be included in the Council’s emerging Housing Land Availability Assessment.

What are we doing next?

1.8.6 This consultation seeks to continue the engagement but on a wider and refined scale considering up-to-date circumstances. We are now seeking comments and information that will help us refine a draft strategy and policies to be included in the new Local Plan. Although we have done much engagement, we will still need to continue to collect evidence to support our approach. This consultation will also assist in identifying what other evidence we still need.



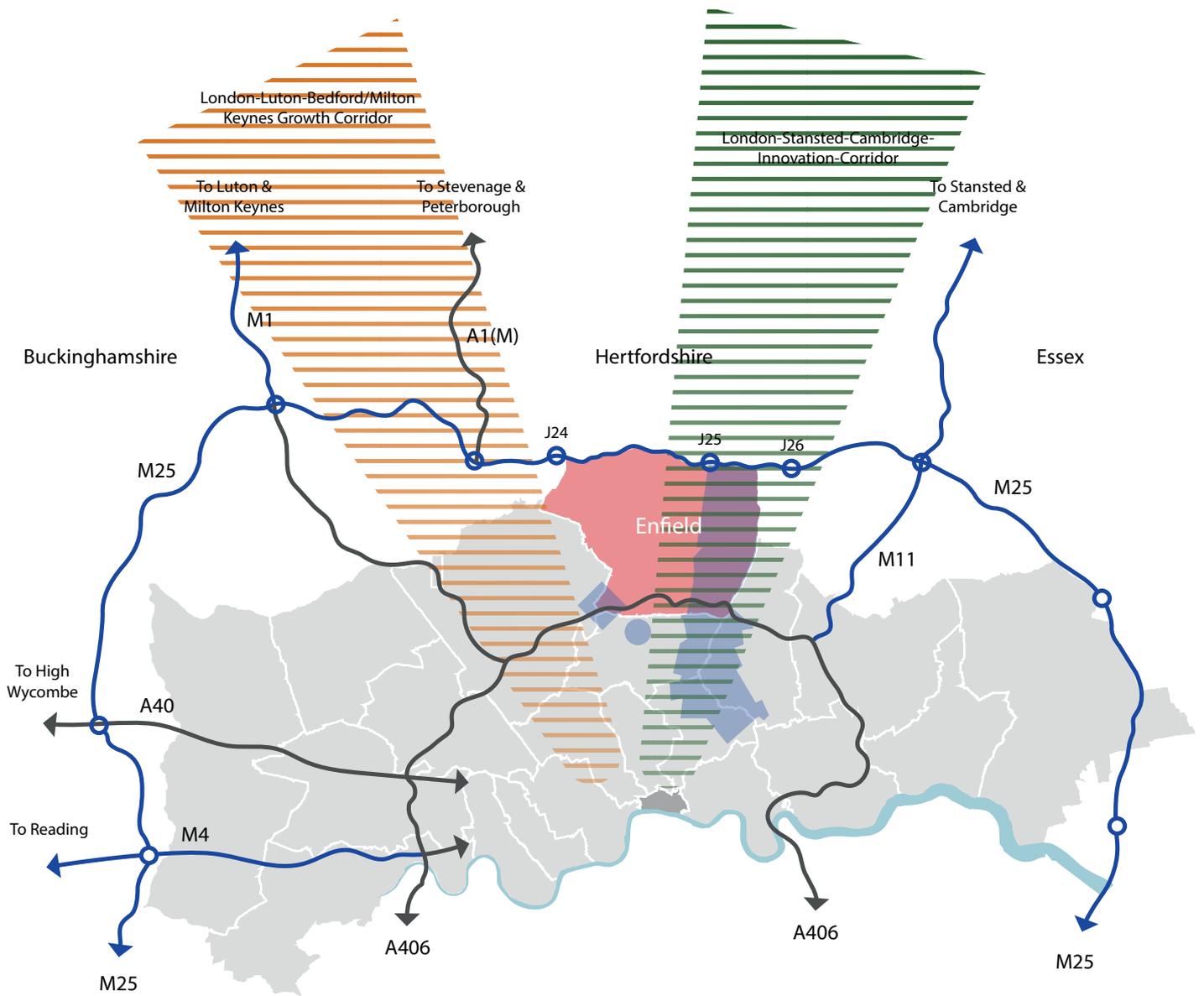


Figure 1.3: Enfield in the context of London, the London-Stansted-Cambridge innovation corridor and the London-Luton-Bedford-Milton Keynes growth corridor

Key

- Enfield borough
- London boroughs
- Motorway
- Major routes
- River Thames
- Growth Corridors
- Opportunity Areas as shown in the draft new London Plan (2017)

1.9 Enfield in London and the wider context

- 1.9.1 Enfield is an outer London borough in north London and is home to approximately 333,000 people and 130,000 households. The borough sits entirely within the M25, north of the River Thames. Central London is approximately 15 miles to the south. Enfield shares boundaries with three other London boroughs: Waltham Forest to the east, Haringey to the south and Barnet to the west. Enfield adjoins the County of Hertfordshire and Broxbourne to the north.
- 1.9.2 Enfield lies on the West Anglia Mainline to London Liverpool Street on a section of the track that is to benefit from Four-Tracking and from the Crossrail 2 investment. Enfield also includes sections of the London Underground Piccadilly Line including stations at Cockfosters, Arnos Grove and Oakwood, which will benefit from increased capacity from new trains and signalling upgrades by the early 2020s. The borough is further served by a number of Transport for London buses.
- 1.9.3 The A10 runs north-south through the eastern part of the borough, linking it to Central London as well as meeting Junction 25 of the M25 connecting Enfield into Hertfordshire and/or Essex and London to Stansted and Cambridge. The North Circular Road (A406) runs east-west in the southern part of the borough, connecting Enfield with east and west London.
- 1.9.4 Enfield is strategically positioned within the London-Stansted-Cambridge Innovation Corridor (LSCC). Some parts of the borough such as the eastern corridor may also see transformational change through the arrival of Crossrail 2 and the improved connectivity it will bring to the area.
- 1.9.5 The LSCC is a strategic partnership of public and private organisations covering the area north from the Royal Docks, up through the Upper Lee Valley, to Stevenage, Harlow and Stansted, and through to Cambridge. This brings together public and private sector organisations which have the common aim of seeking economic growth, higher employment rates, sustained supply chains, and providing places for people and business while preserving the quality and character of the corridor.
- 1.9.6 The Council is a key partner in these initiatives and will play a vital role in the promotion and delivery of the economic growth of these areas.

Figure 1.4: Enfield in the context of Upper Lee Valley



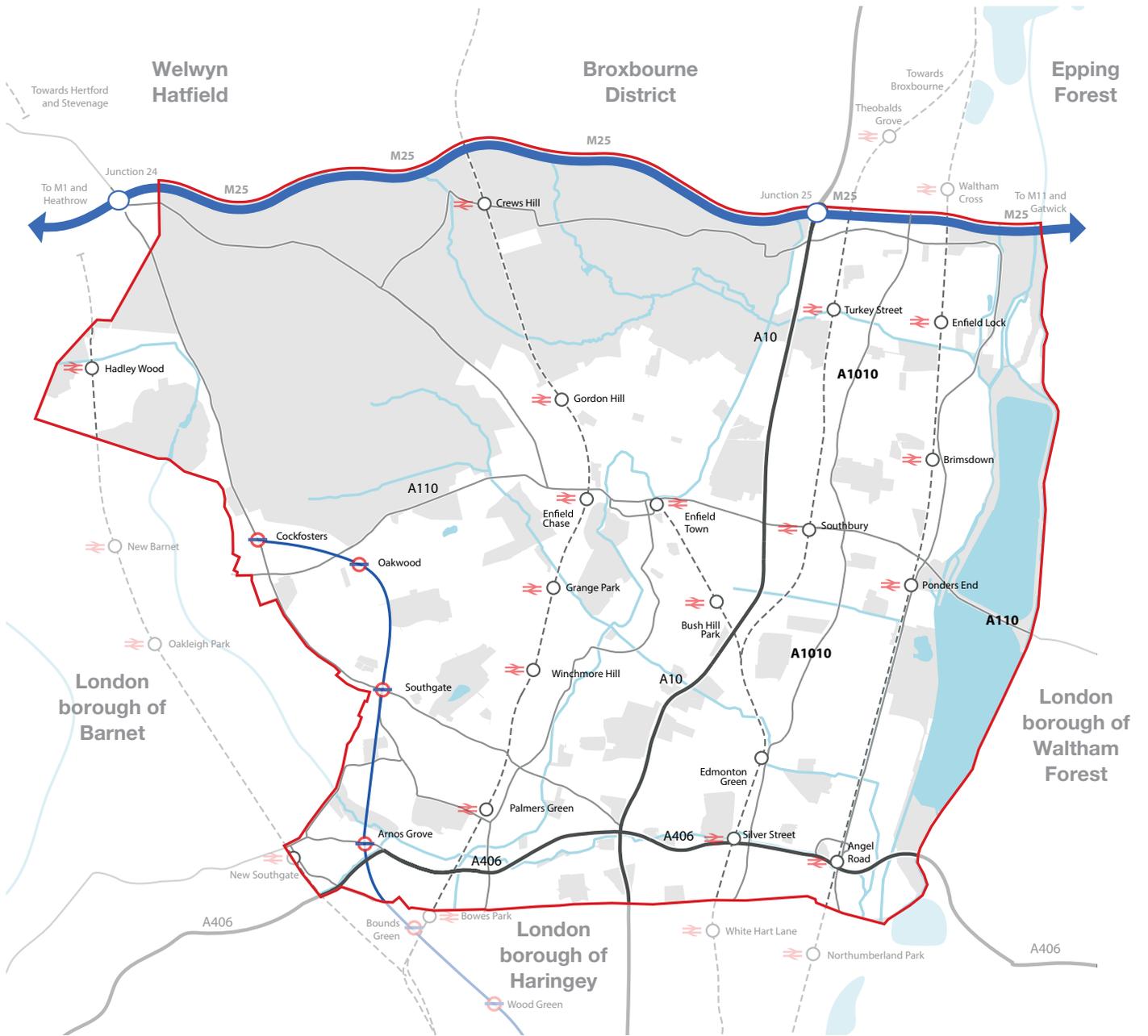


Figure 1.5: Enfield borough

Key

- Enfield borough boundary
- Railway
- Piccadilly line
- Main routes
- Open space
- Waterbody
- National Rail station
- London Underground station

1.10 The Enfield Context

- 1.10.1 Enfield is changing fast. Projection scenarios to 2036 show an increase of roughly 51,000 in population and an additional 31,000 households to Enfield’s current 333,000 people and 130,000 households. Enfield’s population has also been getting younger and much more diverse in recent years. Companies ranging from global conglomerates to low carbon energy providers and craft breweries are settling and innovating in the borough.
- 1.10.2 Enfield also exhibits many of the challenges faced by other communities, particularly in London, of extremes between the wealthy and those in poverty. Enfield is ranked as the 12th most deprived borough in London, 50% of our wards are among the 20% most deprived in England and salaries are 5% below the London average. Levels of deprivation relative to the rest of London are worsening. House prices and land values have been rising. Congestion and pollution are ever-increasing problems, with the entire Borough designated as an Air Quality Management Area (AQMA) due to multiple local areas exceeding Government air quality objectives.

The Council has sought and will continue to work to minimise these inequalities through all its actions including its spatial planning policies, and to celebrate and enhance all that is good about the borough.

- 1.10.3 The Council wants the new Local Plan to reflect the aspirations and choices of its community. However, the Plan must comply with a number of statutory obligations set out in national planning policy and legislation. It has to:
- Reflect national planning policies set out in the NPPF and associated National Planning Practice Guidance (NPPG);
 - Be in general conformity with the London Plan, including bringing forward policies to optimise future growth and infrastructure investment;
 - Contribute to the achievement of sustainable development and be supported by a Sustainability Appraisal (SA) and Habitat Regulation Assessment (HRA);
 - Aim to meet objectively assessed need (OAN) or standard NPPF methodology, and identified infrastructure requirements;
 - Have regard to the other strategies of the Council and its partners;
 - Demonstrate joint working on cross-boundary issues via Duty-to-Cooperate;
 - Take into account evidence of environmental constraints on development and the need to conserve the built and natural heritage; and
 - Be viable and a deliverable strategy within the Local Plan period taking account of identified constraints and infrastructure requirements.

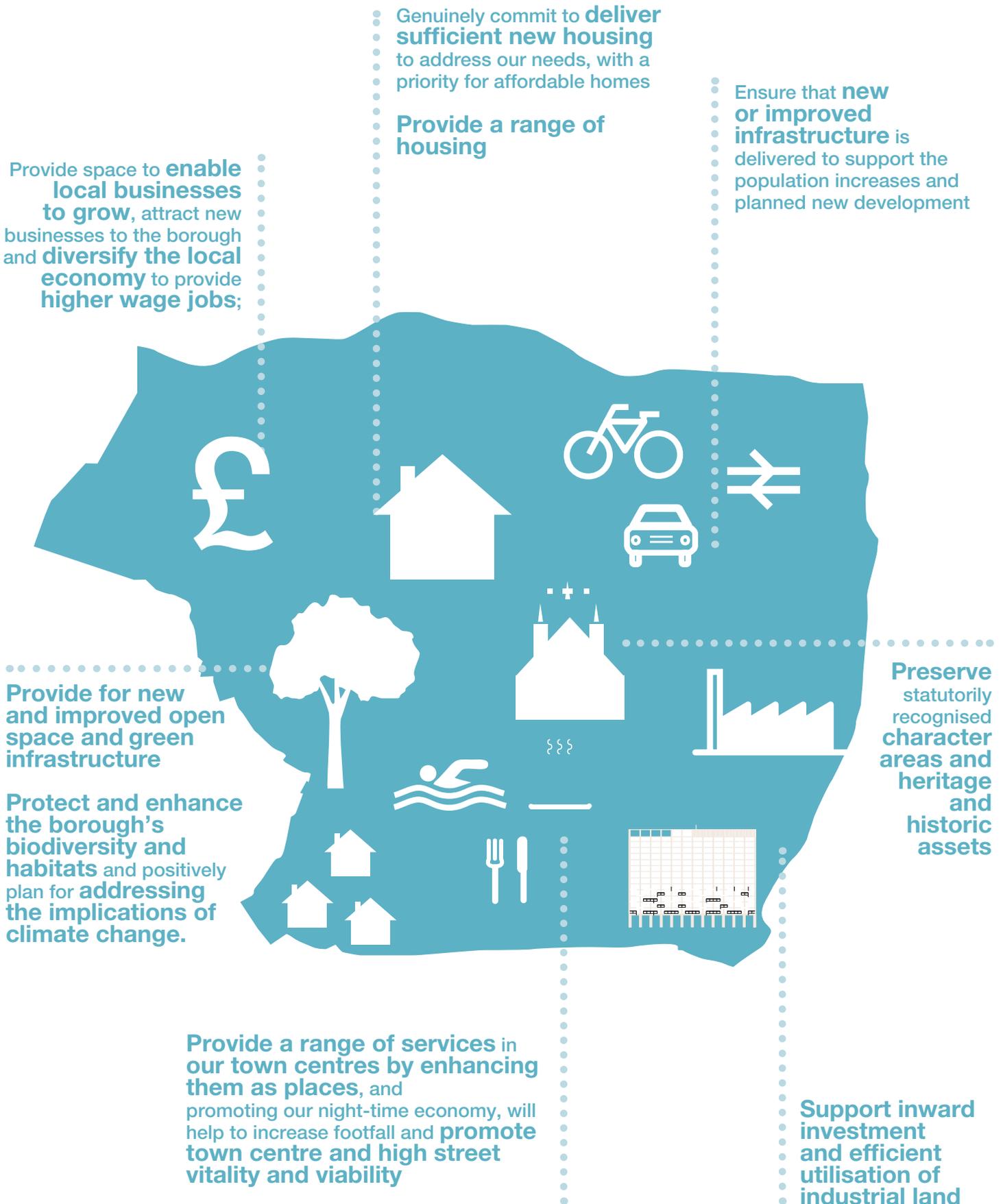


Figure 1.6: Challenges in Enfield

1.11 Challenges facing Enfield

1.11.1 The key challenge facing Enfield is that as growth and change will affect the whole borough, we must ensure that this also brings improvements for all residents and does not destroy the existing positive aspects of the borough, which residents are proud of and wish to protect. These include: unparalleled access to high quality greenspaces; our long established local character (supported by local culture, history and heritage); our strong sense of community; and our good access to transport, high streets, town centres and facilities.

1.11.2 More specifically, the new Local Plan will need to:

- Genuinely commit to deliver sufficient new housing to address our needs, with a priority for affordable family homes;
- Provide a range of housing that meets needs, for example related to size, tenure, and elderly and specialist needs accommodation;
- Provide space to enable local businesses to grow, attract new businesses to the borough and diversify the local economy to provide better paid jobs;

- Fully capture the regeneration opportunities unlocked by significant transport investment, especially where these would help us to exceed homes and jobs targets or deliver the homes and jobs more quickly;
- Maximise Enfield as a place where you can get on, progress and do well;
- Support inward investment and efficient utilisation of industrial land and proactively looking at alternative uses for land which is currently developed but not allocated for a specific purpose to meet identified development need whilst not undermining key economic sectors or sites;
- Provide a range of services including residential, leisure and social activities, in addition to traditional retailing with more bars, restaurants, food outlets and community spaces. We want our town centres to be more than just retail locations; they function throughout the day and the night. Enhancing our town centres as places, in addition to promoting our night-time and evening economy, will help to increase footfall and promote town centre and high street vitality and viability;
- Ensure that new or improved infrastructure is delivered to support the projected increases in population and planned new development, including strategic transport improvements, utilities and measures to reduce potential adverse environmental impacts;
- Provide for new and improved open space, and green and blue infrastructure;
- Preserve statutorily recognised character areas and heritage and historic assets; 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.



Figure 1.7: Makers at Bloq, a creative enterprise in Enfield

1.12 What are the key stages in producing the new Local Plan

1.12.1 To ensure we can deliver the new homes, jobs and infrastructure required for the borough, our new Local Plan must be deliverable. To do this it must meet the test of soundness set out in the NPPF (2018), as summarised in Table 1.1 (right). As a Local Planning Authority, we have to follow the process set out in the Town and Country Planning (Local Planning) (England) Regulations (2012). Details of the stages are set out in Figure 1.8.

Positively prepared	The plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.
Justified	The plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.
Effective	The plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities.
Consistent with national policy	The plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

Table 1.1: Test of Soundness (NPPF).

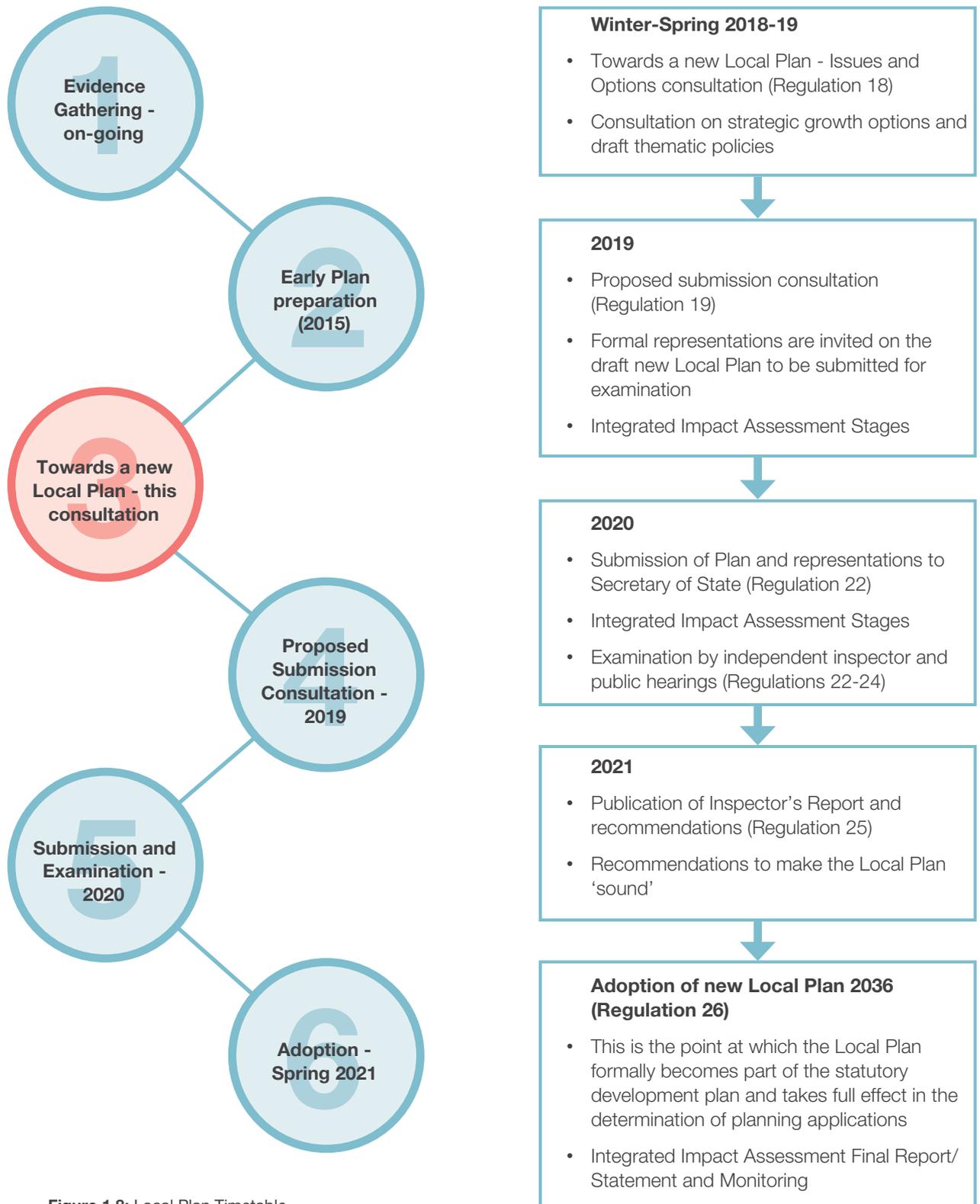
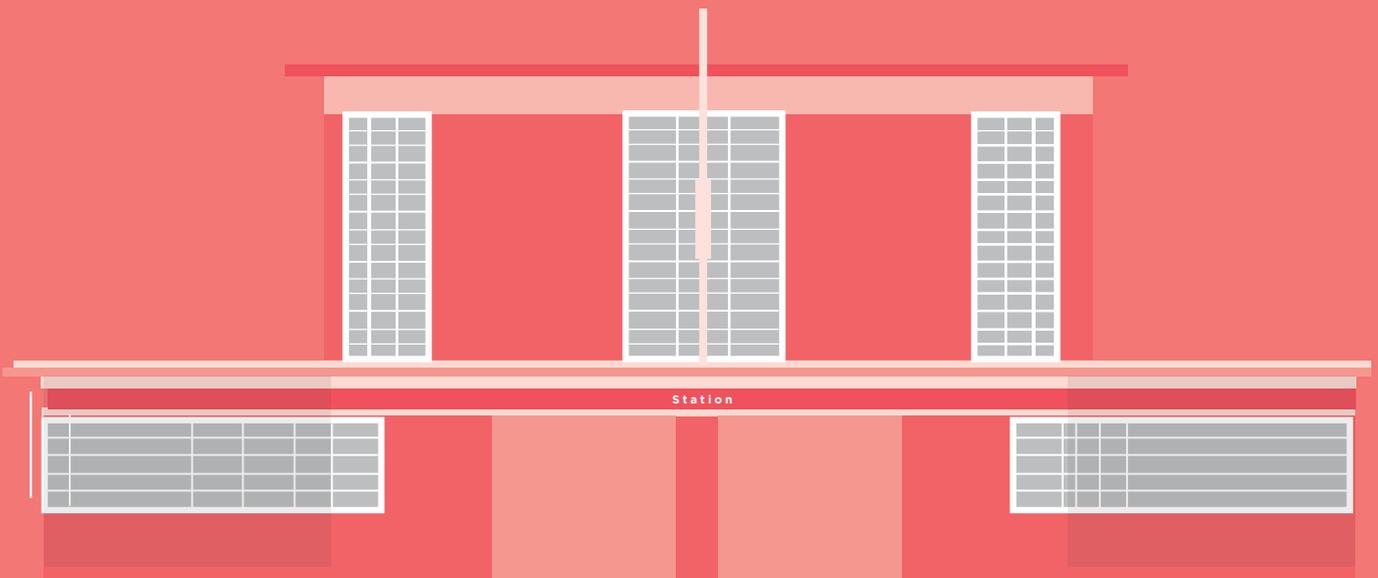
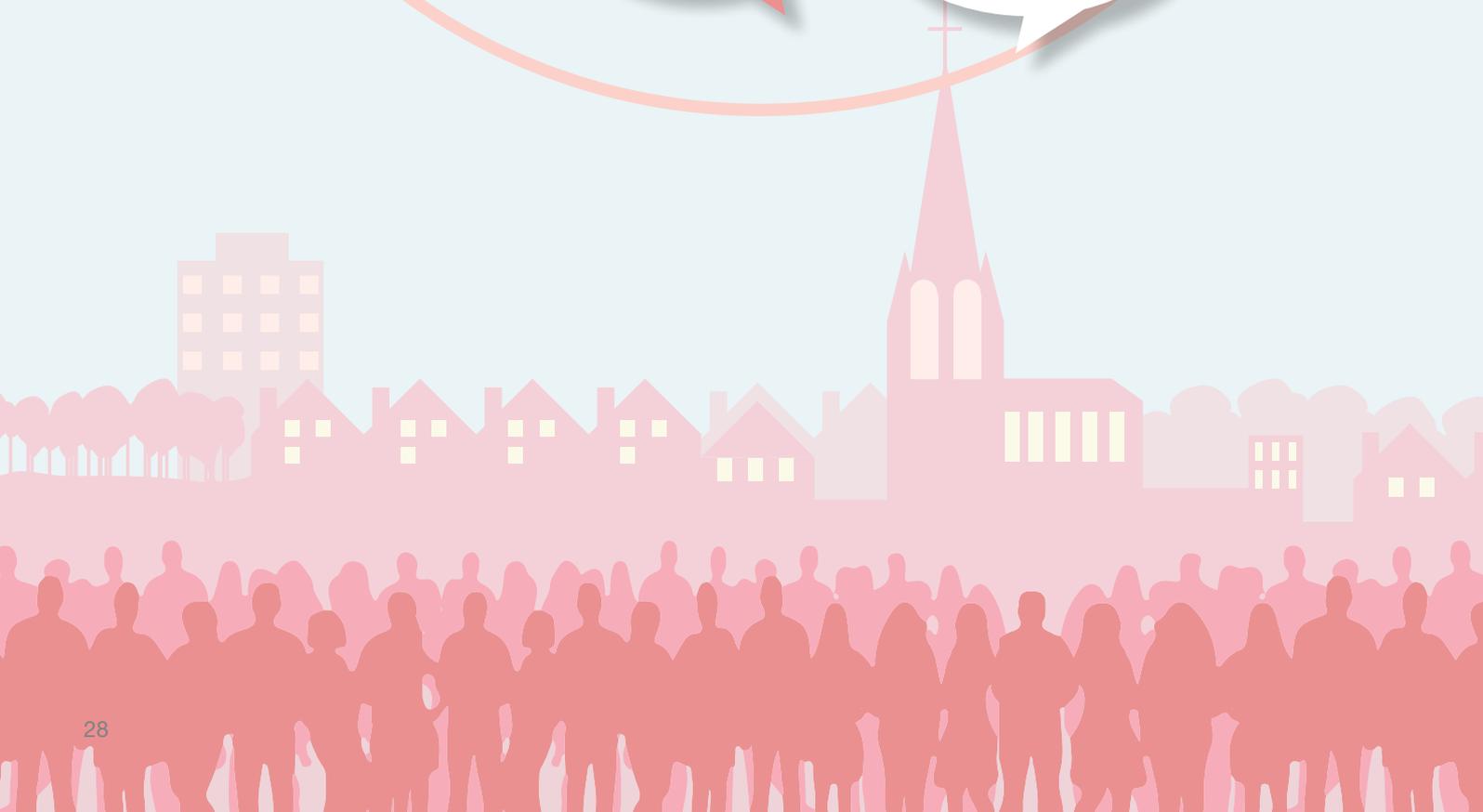
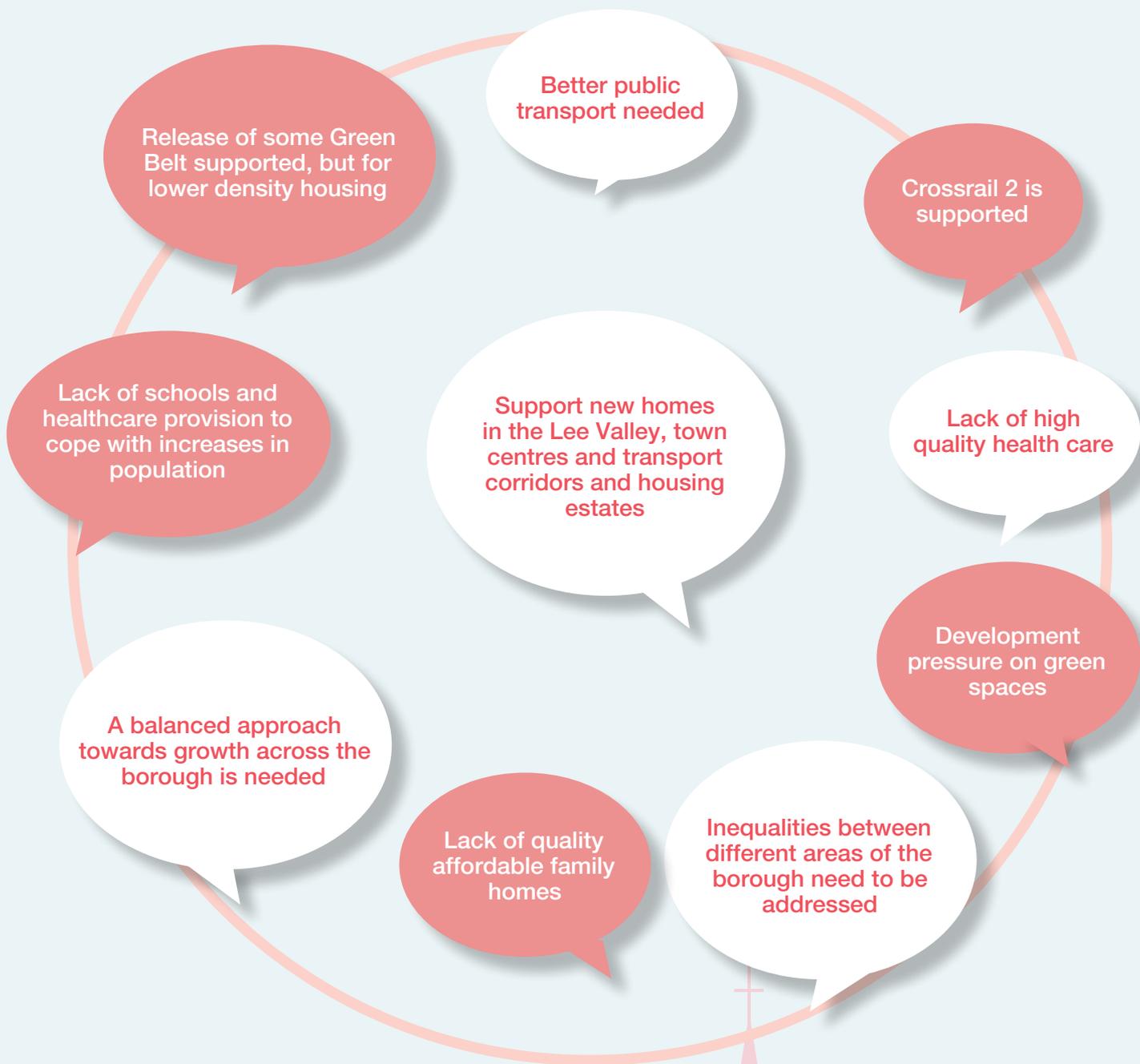


Figure 1.8: Local Plan Timetable



2 Promoting good growth options in Enfield

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2 Promoting good growth options in Enfield

2.1 Introduction

- 2.1.1 The key function of a successful Local Plan for Enfield, besides meeting the Council’s statutory plan making function, is to accommodate future growth in a way that makes the borough better for everyone. We need to use growth opportunities to readdress inequalities, secure infrastructure investment and improve our environment by responding to the challenges of climate change.
- 2.1.2 There are 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. Amongst other factors, these inequalities contribute to discrepancies between life expectancy and poverty rankings between east and west, which the Council is committed to reducing.
- 2.1.3 Further inequality is experienced between generations as the borough’s children and young people, elderly and the chronically ill or disabled suffer disproportionately from a variety of issues ranging from pollution to high and rising house prices.
- 2.1.4 Addressing the shortage of housing in Enfield is a priority. Delivering more housing also means we can deliver many more affordable family homes in the future than in the past. The draft new London Plan (2017) is currently proposing that Enfield now should deliver 1,876 additional dwellings each year between April 2019 and March 2029 which equates to 18,760 homes over the next 10 years. Meanwhile, the government’s objectively assessed need for housing in the borough is 3,500 dwellings each year, equating to 35,000 for the same period. However, the reality is that Enfield has only delivered on average approximately 550 dwellings a year since the adoption of the Core Strategy in 2010. Given past delivery rates of new homes Enfield’s new Local Plan will have to plan for more housing, in order to deliver more. Further work is needed to assess Enfield’s local housing need to understand what we plan to deliver over the minimum plan period of 15 years which, may well exceed both regional and national targets.
- 2.1.5 The new National Planning Policy Framework (NPPF) (2018) says that the Council must adopt a new methodology in order to calculate our own local need. The Secretary of State has already indicated that the draft new London Plan’s housing need assessment falls short of what would be required and an urgent review of the London Plan will be required following its adoption. Notwithstanding the requirement for an urgent review, the Council would need to plan for a significant amount of housing growth.
- 2.1.6 This places Enfield in a very difficult situation as the new Local Plan will now need to be prepared in accordance with the new national methodology and therefore the expectation is that we will have an even higher requirement than what is currently being proposed in draft new London Plan. That is, in preparing Local Plans, the government and the Mayor expects boroughs to ‘do more’ and seek to exceed their London Plan housing target. To do nothing, would be ‘doing less’ and would certainly attract objection from the Mayor.
- 2.1.7 Accordingly, the Council will now evidence Enfield’s own local housing need, assessed in accordance with national requirements and plan for this need through this new Local Plan. The scale of challenge in going from delivering 550 homes to 1,876 homes or 3,500 homes a year will mean looking at new ways of building homes, new sources of housing land and new areas of the borough not previously considered for homes. Not to do so would lead to unplanned and potentially inappropriate development being built in unacceptable and unsustainable locations. Moreover, under-delivery of new homes means not being able to deliver the type of housing our residents need, such as family homes.

Figure 2.1: What you said as part of the Enfield Conversation



2.2 What you said

Early Issues and Options (2015/16)

2.2.1 Consultation exercises to date have been used to gauge the priorities of residents for future growth in the borough. These highlighted clear and reasonable concerns about what would happen if growth is not properly managed and accommodated, including:

- Overcrowding and a lack of truly affordable housing;
- A lack of high quality health care facilities and other infrastructure provisions to cope with the increases in population; and
- Increasing inequalities between different areas of the borough and about development pressures on green spaces.

Enfield Conversation (2017)

2.2.2 A more recent consultation exercise, the Enfield Conversation, highlighted further local concerns and priorities. The Enfield Conversation engaged a wider mix of residents beyond those traditionally engaged in the plan making process, and provided residents with an informed position on the challenges of how to secure more housing and the trade-offs involved. In discussions we found:

- Building homes in the Upper Lee Valley remained the most popular spatial choice followed by the town centres, the A10 corridor and on Council estates;
- There was some support for low density housing in the Green Belt but the general view was that high-density apartments would be the most efficient way of delivering more housing; and
- There was concern that more housing would not be matched by the appropriate supporting infrastructure.

2.2.3 Some residents were willing to consider some Green Belt land for development, recognising that not all Green Belt is open countryside and especially if this meant quality family homes at lower densities can be delivered; whilst others preferred accepting higher densities, especially around town centres and transport hubs, where they can have better access to open space.

2.2.4 Regarding infrastructure investment, over 95% were in support of Crossrail 2, but a majority wanted associated major investment. When asked what future investment priorities should be for the borough most respondents felt that housing standards, congestion and commuter rail line frequency were most in need of investment to enable improvements for residents.

2.2.5 There was a general acceptance that new homes were needed but there was some concern that the necessary infrastructure and affordable homes elements would not be met.

2.2.6 The Council recognises that past growth has often not met the real needs of residents. This new Local Plan is an opportunity to mark a real step-change in our attitudes to how good growth should come forward. Development should be planned and actively enabled at the right scale rather than decided piecemeal by private developers.

2.2.7 Based on the views expressed to date; national planning guidance; and on realistic options and constraints, the following sets out a number of options on accommodating growth.

2.3 Realising opportunities and a Call-for-Sites

- 2.3.1 The Council wants growth in the borough to be an opportunity to benefit all existing and new residents. Therefore, it is time for a challenging and transparent two-way conversation about how this can be done.
- 2.3.2 As Enfield grows the pressures on the community and social infrastructure, that is our schools and other education facilities, health provision as well as other public facilities such as facilities for play and other recreation will increase unless we plan to increase this at the same time. However, delivery of much of what is required is not a function of the Council. Increasingly, the delivery of new school provision is through the Academy and Free School providers and healthcare provision is in the remit of the NHS. This means that the Council in collaboration with other commissioners and providers will need to work together including the private sector and voluntary organisations to deliver services with effective use of land and buildings.
- 2.3.3 This is at the same time as we are facing the need to deal with people living longer and meeting their special housing needs. The Council is also required under policy to assess and plan to meet any unmet need for Gypsy and Travellers.
- 2.3.4 Further, to support the Core Strategy at the time analysis suggested that Enfield would require 13,540 burial spaces over the medium term. Whilst proposals for an extension of Edmonton Cemetery is to provide a further 1,718 spaces, with the need to meet the growing demand for burial space and the need for new burial options for the diverse communities of the borough, there is still a considerable potential shortfall. The Council will need to address this in the new Local Plan.

**“Call for sites
please visit: [www.enfield.gov.uk/
newlocalplan](http://www.enfield.gov.uk/newlocalplan)”**



2.4 How must we plan differently?

- 2.4.1 Exhausting all reasonable opportunities on brownfield land, making underused land work harder and optimising densities remains first principles of this new Local Plan. This is also a central premise on which sustainable development is reaffirmed in the new NPPF (2018) and the emerging new London Plan. The Council must test all brownfield opportunities for deliverability and a Call for Sites through this consultation will now be undertaken.
- 2.4.2 The Council already has good records regarding the development opportunities in respect of large sites across the borough. These are recorded in the London wide Strategic Housing Land Availability Assessment (SHLAA) (2017) undertaken across the Greater London area in cooperation between the various planning authorities.
- 2.4.3 However we are being faced with pressures to also ensure that as many small sites as possible come forward for development. In particular:-
- The new NPPF expects 10% of the housing allocated to be from small and medium sized sites (up to 1ha) identified in the Local Plan; and
 - The new draft London Plan 2017 is also expecting around 50% of all housing in Enfield to be delivered from small sites, (up to 0.25ha).
- 2.4.4 Past experience evidences that these are challenging targets to meet, so we need to plan differently.

How can we plan to deliver differently?

- 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;
- Take advantage of the increased capacity from Four-Tracking of the West Anglia Mainline as an early stage of Crossrail 2, and from Crossrail 2 itself, to stimulate regeneration and deliver new homes and jobs;
- Promote development above single storey retail, supermarkets and other commercial uses;
- Redevelop underutilised and low-density land such as surface car parks and underused highway land for both housing and employment;
- Exploit the opportunities around transport corridors such as the A10 and A406;
- Optimise the Council's land portfolio for new development including estate renewal and regeneration programmes;
- Proactively manage and optimise low density industrial land to increase capacity for redevelopment for both housing and employment; and
- Revisit Green Belt boundaries in line with the NPPF to promote sustainable patterns of development to meet growth.

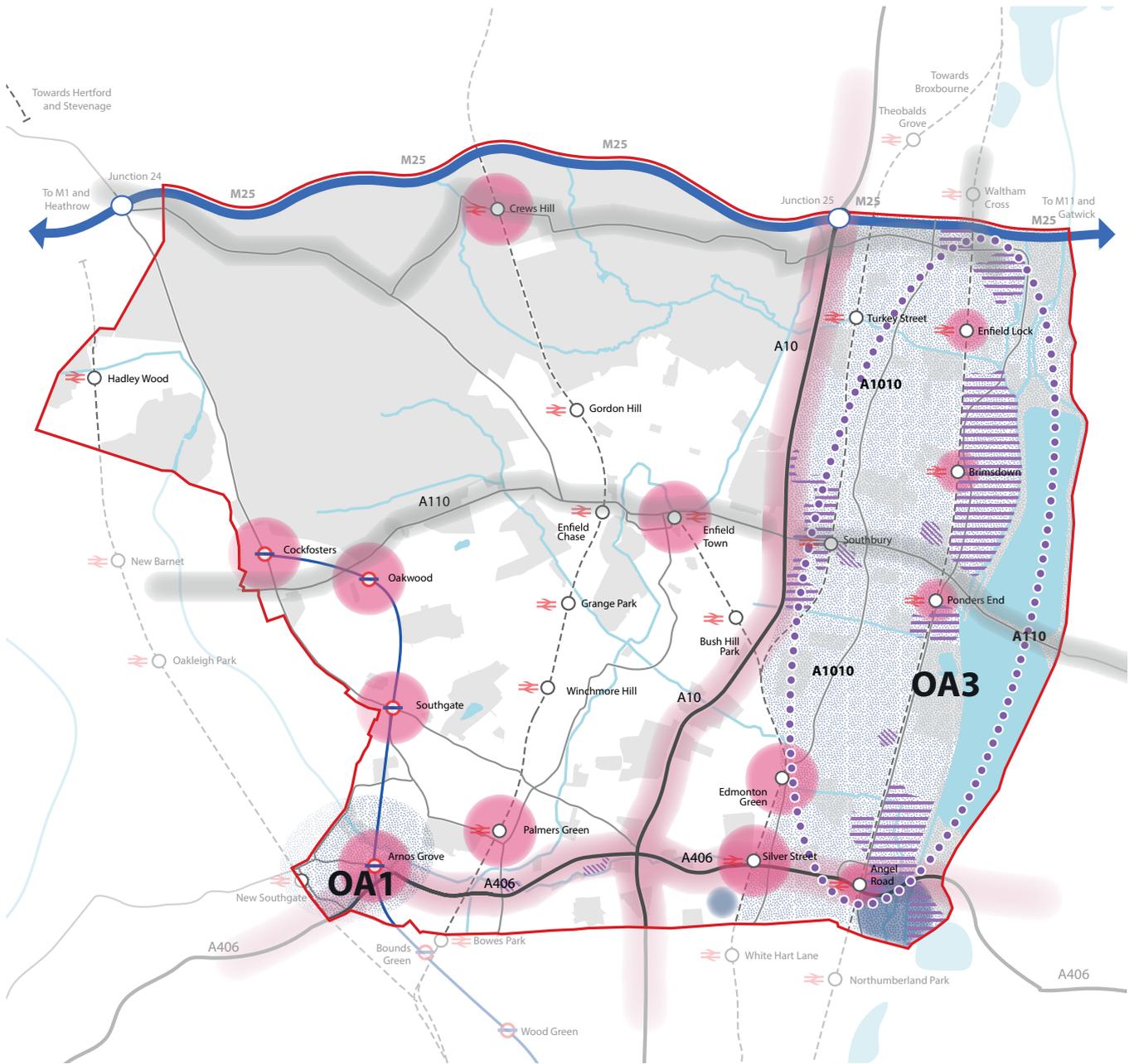


Figure 2.2: Enfield 2036 Growth Options Diagram

- Key**
- Enfield borough boundary
 - Railway
 - Primary road
 - National Rail station
 - London Underground station
 - Piccadilly line
 - Open space
 - Water body
 - Town Centres and areas around stations
 - Movement corridors and linear gateways
 - East west connectivity
 - Eastern Corridor
 - Strategic Industrial Location
 - Locally Significant Industrial Site
 - Estate renewal and regeneration programmes
 - Opportunity Areas** (as identified in the draft new London Plan (2017))
 - OA1** New Southgate
 - OA3** Upper Lee Valley

2.5 Enfield’s draft vision and growth objectives

- 2.5.1 Enfield is growing at a fast pace and the borough needs to proactively manage this change – by delivering a significant amount of new housing, driving growth, supporting businesses to thrive and creating a place people are proud to live, work and visit.
- 2.5.2 The new Local Plan will respond to and deliver these ambitious opportunities as shown on Figure 2.2: Enfield’s 2036 Growth Options Diagram.

A Draft Vision for Enfield

A Place for Affordability & Accessibility

By 2036, Enfield will be a borough that provides for its residents with a choice of homes and public services to meet actual need and affordability through the successful delivery of thriving neighbourhoods that are environmentally conscious and embrace active, resilient and healthy lifestyles.

A Place of Opportunity & Enterprise

New economies are secured to bring competitiveness of the borough’s employment areas to attract regional, national and international investors across all sectors to successfully deliver new jobs and assist in securing the provision of employment training opportunities for local residents.

Enfield will be a place of local entrepreneurs and ‘makers’ of craft and creativity where people want to innovate and do business; where levels of educational attainment, economic activity and entrepreneurship are the greatest in London; where people have access to jobs in sectors that enjoy prosperity and long-term growth; and where high-speed communications and smart technologies will lead the way in accommodating and being part of London’s growth sectors.

A Place for Diversity & Equality

Prosperity is shared across the whole borough to enable people to reach their potential through access to high quality schools and learning. Enfield residents will enjoy an opportunity for active and attractive places to live and work in healthy environments. Our youth and most vulnerable residents will be supported through improved health, education and skill levels to enable everyone to fulfil their potential.

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.

Residents will have improved health and wellbeing and quality of life, improvements to open spaces, as well as new employment opportunities, ensuring that the benefits of growth, regeneration and investment reach everyone in the borough.

A Place that Delivers

Enfield will be an exemplar borough of how joined up partnerships, approaches to regeneration and investment can maximise opportunities to deliver for local people. The Council will deliver on several key regeneration schemes including our flagship Meridian Water project.

New transport infrastructure projects for rail, road and cycling will deliver reduced congestion and improved air quality. The early delivery of Four Tracking of the West Anglia Mainline as an early stage of Crossrail 2 will increase rail capacity, unlock and begin the accelerated regeneration of the eastern corridor and prepare for Crossrail 2.

2.6 Growth objectives

- 2.6.1 The Council has developed a series of growth objectives for the new Local Plan to achieve its vision and help deliver the priorities for the Corporate Plan (2018 to 2022). These objectives have been developed to ensure the Council's strategy to deliver good homes in well-connected neighbourhoods, empower people to create a thriving place, and to achieve healthier, happier lives in a cleaner, greener Enfield – is delivered.
- 2.6.2 The new Local Plan's strategic objectives are set out overleaf:

“ We know this will not be easy, it requires a change to the landscape of Enfield and making choices about where future generations will live and work. ”

Objective 1: Promoting and managing growth

- To promote growth and help achieve sustainable patterns of development by focusing new development in the borough’s main town centres and areas around all stations, transport corridors, housing estate renewal and regeneration programmes, the eastern corridor and low density industrial areas, and through a strategic plan-led approach to the release of Green Belt land where they are accessible and sustainable;
- To meet locally assessed housing need across the borough through the creation of high quality developments in a phased programme to help meet existing and future housing needs;
- To build strong and inclusive communities by providing diversity of type, size and tenure of housing including affordable homes to meet local housing needs, tackle homelessness and to deliver as a minimum the annual housing target of at least 1,876 new homes as set out by the draft new London Plan;
- Respect and enhance the character of the borough’s cultural, built heritage and neighbourhoods;
- Encourage and maintain a mixture of town centre uses in Enfield Town, Angel Edmonton, Edmonton Green, Palmers Green and Southgate, and the borough’s local centres and local parades;
- To improve the health and wellbeing of Enfield’s population and reduce health inequalities through promoting good growth and spatial planning, supporting healthier lifestyles and environmental improvements, as well as ensuring appropriate access to health facilities; and
- To enhance the quantity, quality and density of the borough’s Strategic Industrial Locations (SIL) and Locally Significant Industrial Sites (LSIS), including the possibility for substitution and consolidation, to enable new and emerging businesses in sectors, whilst supporting opportunities for a mixture of uses and co-location.

Objective 2: Achieving design excellence

- To promote high quality, safe and sustainably designed buildings, places and streets; and
- To promote and protect high levels of amenity and quality of life to make Enfield an attractive, successful and vibrant place for all – residents, workers and people visiting.

Objective 3: Enhancing Enfield’s assets

- To enhance the unique historic environment of Enfield and the character, distinctiveness of the borough’s conservation areas and other historic and valued buildings, cultural, spaces and places;
- To improve access to existing open spaces and manage open space deficiency; and
- To protect conditions for biodiversity.

Objective 4: Promoting a green environment

- To provide a strategic spatial planning strategy for growth aligned with, and able to secure the regeneration benefits of, planned new and improved strategic and major transport infrastructure;
- To drive investment in rail, roads and cycling infrastructure to improve connectivity and support economic development;
- To encourage cleaner air;
- To promote low carbon living and working;
- To support the delivery of sustainable infrastructure in the emerging growth areas to enable sustainable mixed-use developments; and
- To manage flood risk.

2.7 A growth strategy for people and places

2.7.1 The approach to accommodating development over the next 15 years requires good growth principles that will ensure residents have a share in the new social and community infrastructure, have access to a range of housing types, new schools, improved health and well-being and quality of life, improvements to open spaces, as well as new employment opportunities, ensuring that the positive benefits of growth, regeneration and investment reach all residents of Enfield. Both the national and London Plan policy stress the need to plan for growth and development.

2.7.2 The Council has identified five broad options as to where the majority of new development could be accommodated. These options are shown on the Strategic Growth Options diagram at Figure 2.2. Each is distinctive and have the potential to support a balanced mix of land uses, helping to revitalise town centres, local employment and leisure opportunities, whilst also providing new community facilities and homes.

2.7.3 It is not the Council's intention that large parts of each option would be built on. The need to achieve a balance of uses and not focus solely on housing delivery is an important thread running in the new Local Plan. The provision of open space would be a critical part of the mix, along with health, schools and other facilities. Some of the larger areas may present the opportunity to develop low density housing, closely combining family accommodation with parks, open space and leisure and recreation opportunities.

2.7.4 These broad options include:

- Our main town centres and areas around all stations;
- Transport corridors;
- Existing estate renewal and regeneration programmes;
- Eastern corridor and low density industrial areas;
- Future Crossrail 2 Growth Corridor;
- The New Southgate and Upper Lee Valley Opportunity Areas; and
- Strategic plan-led approach to Green Belt.

2.7.5 Each of the potential options has its strengths and weaknesses and a deliberate decision has been made not to identify a preferred development strategy in the document in order to conduct an open conversation on a variety of alternatives for respondents to consider the implications and relative merits of each of these. We need to have realistic options in the context of the Council's national and regional obligations in preparing its Local Plan. Accordingly, meeting as a minimum the draft new London Plan target of 1,876 homes a year for the next 10 years will mean that we need to consider all these sources of new development.

2.7.6 There are no easy options, but the Council has identified strategies which it believes to be credible and to embrace the realistic approaches that are available. They all involve difficult choices and are not necessarily mutually exclusive. The emerging growth options are discussed next, along with a description of the features which allow them to further sustainable development.

2.8 Town Centres and areas around stations

- 2.8.1 In light of national and London Plan policy, areas with high levels of public transport accessibility are identified as high priority areas for development, where higher densities are allowed or even required. The assumption is that such areas reduce the potential reliance on the private cars, whilst having the critical mass to support facilities to meet the everyday needs or providing the opportunity to meet those needs more easily elsewhere.
- 2.8.2 The borough's main town centres are therefore sustainable locations for mixed use development and we want to increase the supply of new homes, jobs, community facilities and commercial activities. For example, this could be done by raising densities and building heights of new development and allowing for more growth for the district and local centres. It may also require a relaxation of standards for the provision of car parking and amenity space to allow enough housing to be delivered. Our town centres already contain a rich and complementary mix of activities which mean that residents and businesses can meet a high proportion of their needs locally, without the need to travel by car.



- 2.8.3 Likewise, access to public transport, particularly to tube and rail stations, gives nearby communities convenient access to work, leisure and shopping opportunities across the capital. Areas with good access to either town centres or transport nodes will therefore all have a significant role to play in meeting our growth ambitions.
- 2.8.4 The major and district town centres of Enfield Town, Edmonton Green, Angel Edmonton, Palmers Green and Southgate offer the widest range of facilities, catering for the majority of residents' needs locally. All these centres are highly accessible with access to the tube or rail network, as well as multiple bus routes, and therefore offer the most sustainable location for higher density and mixed-use development.
- 2.8.5 While local centres contain a smaller variety of facilities, they still cater for many of the local community's needs. Where these centres are in close proximity to transport nodes, they may also be suitable for higher density development.

How should growth be delivered and what form would it take?

- 2.8.6 These centres and areas surrounding tube and rail stations all have the potential to bring forward new homes, jobs and public services through a combination of higher densities and infill opportunities. Development would be concentrated within 800 metres (approximately a ten to fifteen minute walk) of a town centre, tube or rail station. Policies would need ensure that new development complements the area's existing character and the quality of life of existing residents.



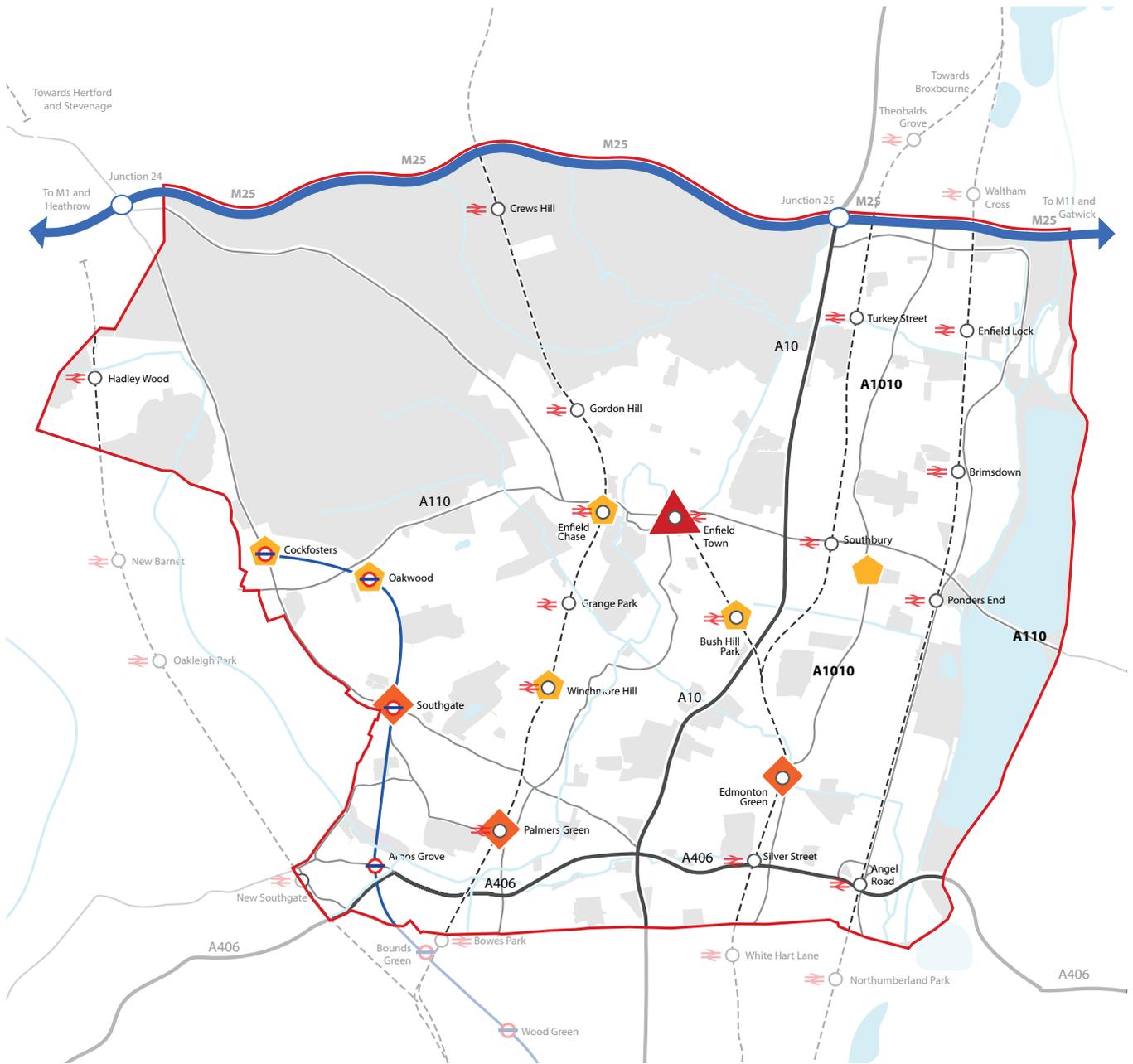


Figure 2.3: Enfield's Town Centres

Key

- Enfield borough boundary
- Railway
- Primary road
- National Rail station
- London Underground station
- Piccadilly line
- Open space
- Major Centre
- District Centre
- Large Local Centre

What are the benefits?

- 2.8.7 Delivering growth within the existing urban area and in close proximity to town centres and tube and rail stations has the following benefits:
- Proximity to existing facilities and public transport, reduces the need to travel by car to meet residents’ needs;
 - Proximity of existing infrastructure makes development more economically viable;
 - New homes can be delivered without any loss of existing commercial and industrial floorspace;
 - New homes create an increased customer base to rejuvenate town centres and attract new businesses;
 - Development could help fund improvements to existing neighbourhood’s area, such as public realm improvements, new facilities and services;
 - Development allows homeowners, if they wish, to bring forward land for development, to generate income or provide accommodation for family members;
 - Development can be used to address inequality, increase access to, and provide natural surveillance of, existing green spaces and waterways;
 - Development reduces pressure on other potential sources of land including employment land and the Green Belt; and
 - Development above existing employment premises.
- 2.8.8 Similarly, employment uses are often accommodated in single storey structures. With good design, most employment uses can be located alongside or below homes. For example, by carefully considering views from residential units, creating separate access routes for residential and industrial traffic, sensitive siting or vehicle and storage yards and ensuring that there is sufficient noise and vibration insulation between different uses.

What are the challenges?

- 2.8.9 Town centres and areas around stations may be capable of delivering a significant number of new homes. However, sites are generally in multiple ownership and are too small to further accommodate associated community facilities that require large amounts of land, such as schools. Higher densities means more flats and this approach may be less compatible with the character of some locations, generally that of areas where there are low density family homes.
- 2.8.10 It also cannot be assumed that higher densities will automatically make sites more viable. There are also several Conservation Areas in the borough which could be put at risk by intensified development outcomes. Enfield Town for example is a Conservation Area.
- 2.8.11 More work is needed to understand the site availability and deliverability, and the impact on residential character. However, it is believed that town centres and areas around stations are generally free from constraints and are highly accessible.

Figure 2.4: Example of residential development in town centres



2.9 Transport corridors

2.9.1 The Great Cambridge Road (A10) and North Circular Road (A406) corridors have potential areas that would bring forward a scale of development opportunity, alongside supporting transport infrastructure improvements that have the potential to create new and cohesive sustainable communities. Land that is currently being used inefficiently by single storey industrial, commercial and retail buildings and surface level car parking should be promoted for intensification and comprehensive redevelopment.

How should growth be delivered and what form would it take?

2.9.2 Development can be delivered in similar ways to those described for town centres and areas around stations. There are likely to be opportunities for intensification of large retail and employment uses (and associated parking) as well as underused highways land.

2.9.3 Further work is needed to understand the capacity of sites along these transport routes. However, there are significant opportunities to look at comprehensive intensification of retail parks, such as Colosseum Retail Park and Enfield Retail Park

What are the benefits?

2.9.4 There are a number of larger sites located along these transport routes that could significantly contribute to Enfield's growth requirements. In particular, low density commercial buildings with large floor plates and associated parking offer opportunities to deliver efficiently and holistically designed new communities, without the need for complicated land assembly.

What are the challenges?

2.9.5 Not all of the available sites along transport corridors are in close proximity to existing facilities and public transport. Development in areas away from these facilities could therefore generate additional traffic and associated congestion, noise and air pollution unless improvement to transport, accessibility through sustainable modes and social infrastructure can be funded through development.

2.9.6 More work is needed to understand the impact of the loss of retail parks and whether these should be earmarked for mixed use and housing led development. However, it is believed that these types of development are better located in or near town centres and their presence could currently be harming the health of our high streets. Opportunities for relocation of comparison retail floor space within town centres may therefore need to be sought.



Figure 2.5: Existing road network

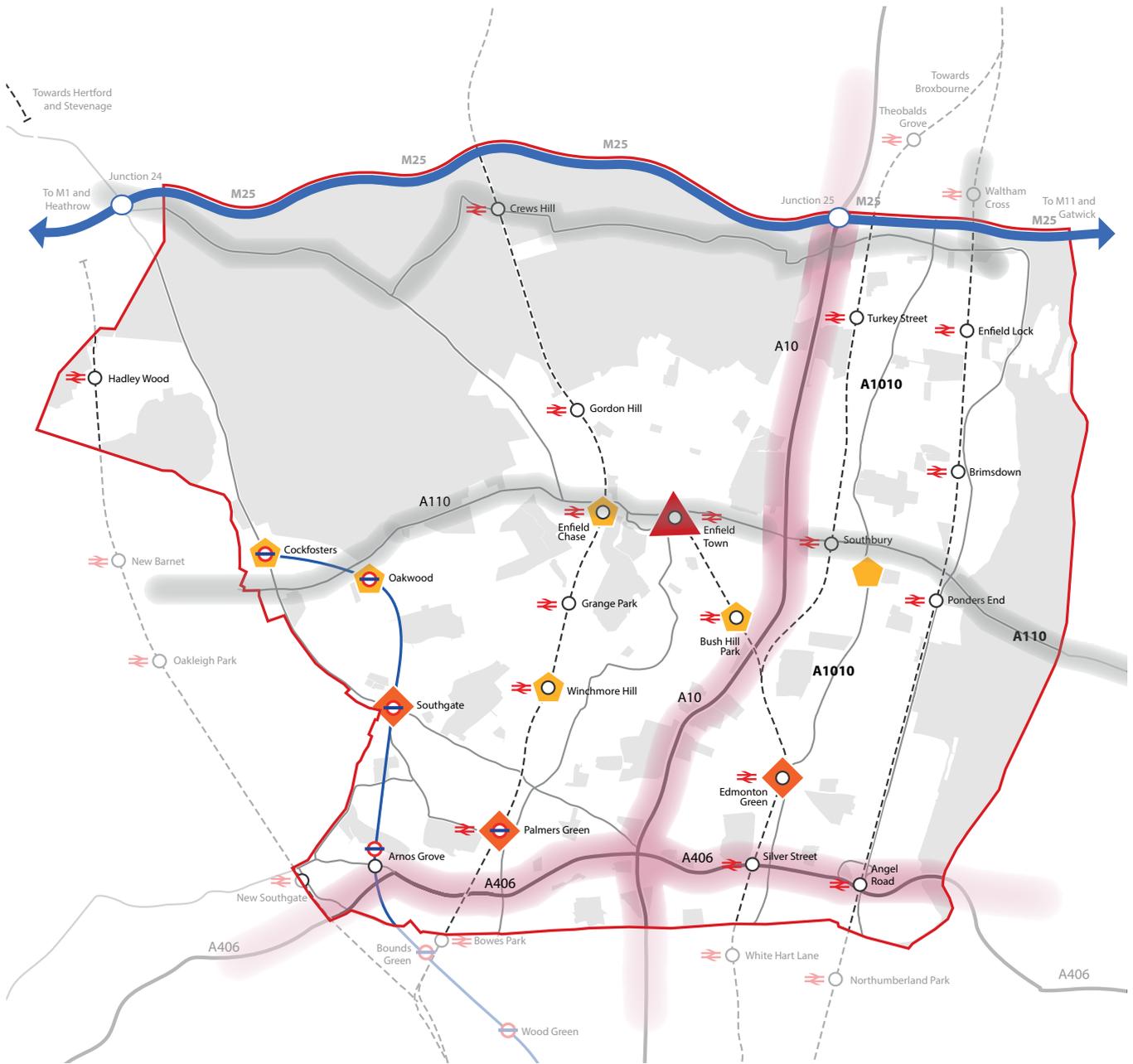


Figure 2.6: Transport corridors

Key

- Enfield borough boundary
- Railway
- Primary road
- National Rail station
- London Underground station
- Piccadilly line
- Open space
- ▲ Major Centre
- ◆ District Centre
- ⬠ Large Local Centre
- Transport corridors

2.10 Estate renewal and regeneration programmes

- 2.10.1 In addition to the above sources of growth, the Council is already driving a successful programme of estate renewal with 3,000 new homes being delivered in New Southgate, Ponders End and Edmonton. The £6bn Meridian Water development will provide the early delivery of homes within the new plan period up to 2036 and more over its 20 year programme.
- 2.10.2 The growth within our existing neighbourhoods through the renewal and intensification of housing estates will continue to contribute to new homes, jobs and community facilities over the plan period and beyond as the Council takes an active approach in delivering new homes for those in most need.



Figure 2.7: Computer generated images of Meridian Water (left) and Alma Estate in Ponders End (right)

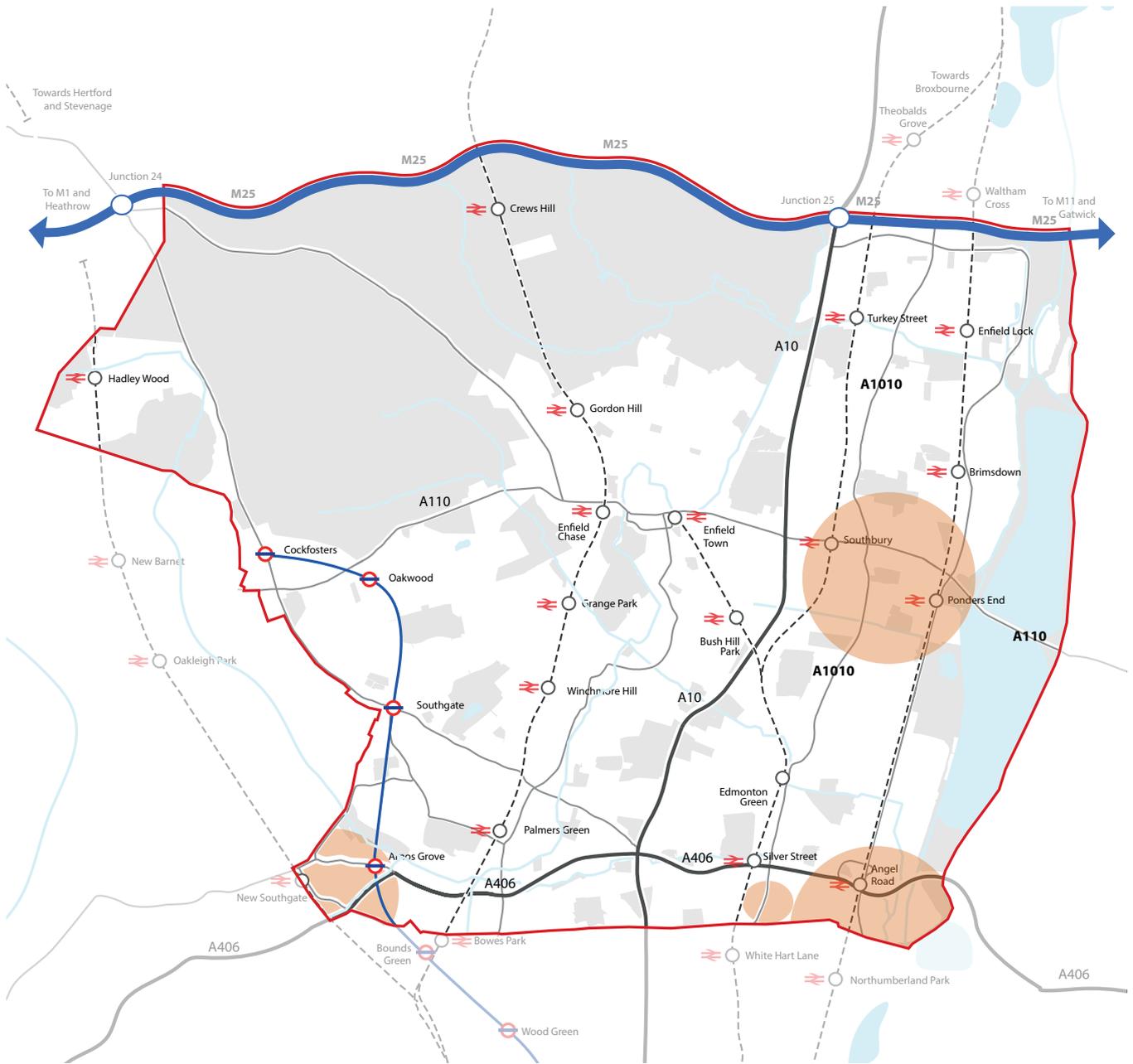


Figure 2.8: Enfield's estate renewal and regeneration areas

Key

- Enfield borough boundary
- Railway
- Primary road
- ⇄ National Rail station
- London Underground station
- Piccadilly line
- Open space
- Water body
- Estate renewal and regeneration areas

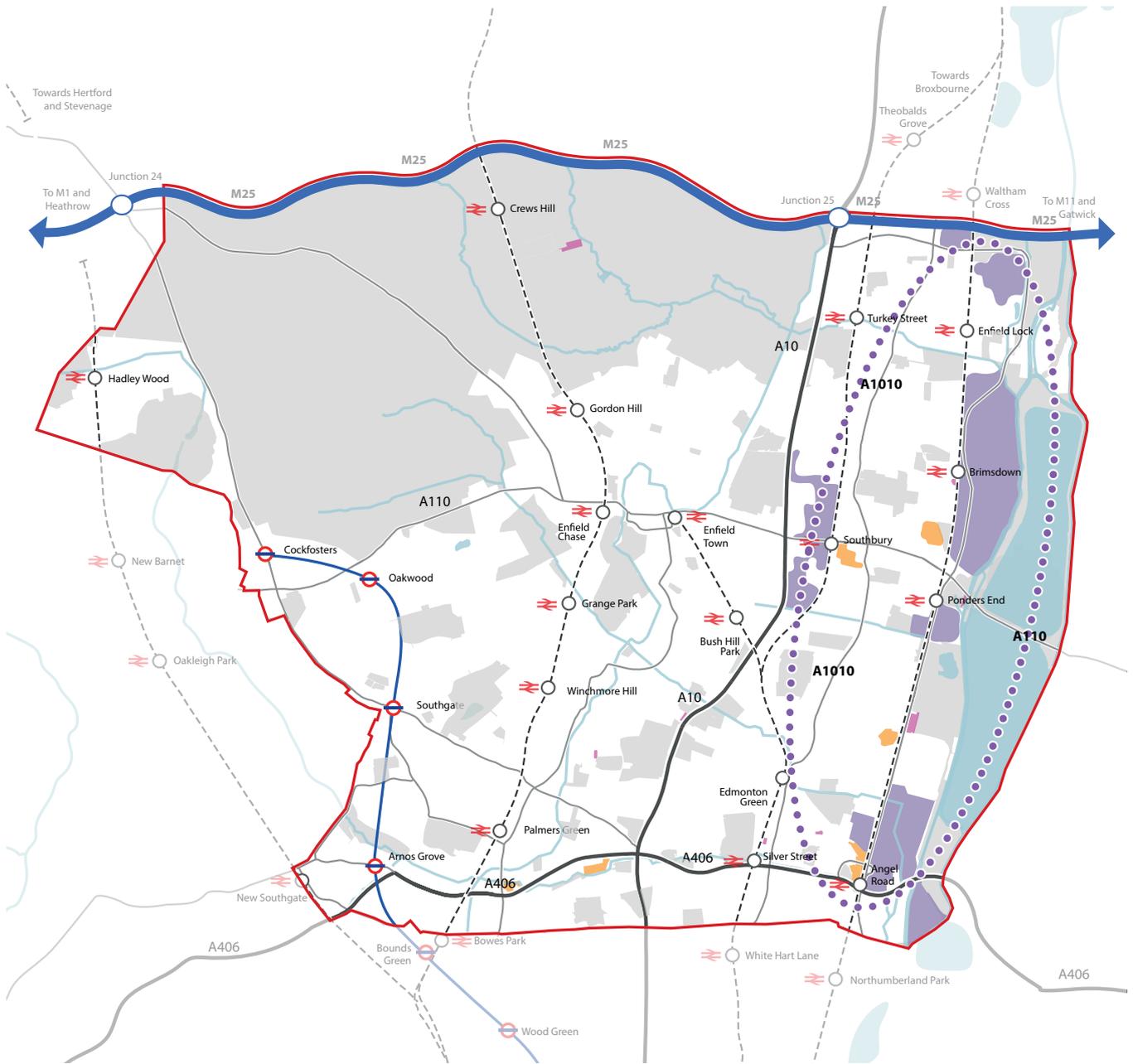


Figure 2.9: Strategic Industrial Locations and Locally Significant Industrial Sites

Key

- | | | | |
|--|----------------------------|---|-------------------------------------|
|  | Enfield borough boundary |  | Open space |
|  | Railway |  | Water body |
|  | Primary road |  | Eastern Corridor |
|  | National Rail station |  | Strategic Industrial Location |
|  | London Underground station |  | Locally Significant Industrial Site |
|  | Piccadilly line |  | Non-designated industrial site |

2.11 The Eastern Corridor and industrial areas

- 2.11.1 Enfield currently has over 400ha of industrial land, the majority is located in the eastern corridor which accommodates a large concentration of businesses generally on older industrial sites in low densities. The North East Enfield corridor lies within the London to Cambridge Growth and Innovation Corridor. The London-Stansted-Cambridge-Consortium (LSSC) has identified the potential of the corridor to be the next global knowledge region, building on its success already as the leading region in the UK for ideas, innovation and entrepreneurship.
- 2.11.2 The proximity of sites in the eastern corridor to the proposed Crossrail 2 infrastructure project means we need to consider whether our low density industrial areas are making the best use of the land in the future or whether there is a need to take a proactive approach to providing growth opportunities through increasing their capacity, quality and density.
- 2.11.3 We have over 400ha of industrial land, of which approximately 326ha is currently classified as Strategic Industrial Location (SIL) and Locally Significant Industrial Sites (LSIS). The draft new London Plan identifies the borough as a location where strategic demand for industrial logistics and related uses is anticipated to be strongest, associated with the growth of London and the need to provide activities crucial to for the City’s metabolism.
- 2.11.4 This requires intensified and additional floorspace capacity in either existing and/or new locations. Intensifying and exploring opportunities for mixed uses and co-location of both SIL and LSIS with high density employment and housing can help create sustainable communities.
- 2.11.5 Including industrial land as part of the growth options provides the opportunities for greater variety in employment, housing and density, reducing the distances between homes, schools, the work place, community and town centres. This approach can lead to more compact development with a strong neighbourhood character, as well as pedestrian, cycling and public transport friendly environments.
- 2.11.6 A proactive approach towards our industrial land has the potential to deliver a net increase in jobs and raise the quality of employment in the borough. The Council believes there are opportunities to achieve this through new industrial typologies and in a phased growth approach. Fully capturing the benefits of transport improvements in the eastern corridor may require a proactive approach to land assembly, SIL substitution through relocation, consolidation, intensification and optimising efficiency through design.



Figure 2.12: (left) Housing above industrial units, Cambridge Heath.

Figure 2.11: (above) Student accommodation above light industrial uses, as seen as part of the Travis Perkins redevelopment scheme, at Kings Cross Central



Figure 2.10: (below) Computer generated image of the redevelopment at the former Nestle Factory in Hayes (Hillingdon) source: Hawkins\Brown seeking a mixture of uses seeking to develop an industrial site through the delivery of around 1,300 new homes, at least 500 new jobs and 22,663 sqm of new high specification commercial floorspace (B1c, B2 and B8), in addition to associated leisure and retail facilities



How should growth be delivered and what form would it take?

- 2.11.7 Existing industrial land can be used more efficiently through the introduction of mezzanines, basements and smaller infill units. Having regard to operational requirements, the redevelopment of existing employment sites should also consider the need to optimise the potential floor space delivered, including the potential for multi storey and mixed-use development, including new homes - similar to the redevelopment of the former Nestle Factory in Hayes.
- 2.11.8 To ensure that any mixed-use proposals do not result in a net loss of employment floor space nor undermine the operation of employment uses, this type of development will need to be holistic and plan-led.
- 2.11.9 High quality design will be crucial to ensure that residential and industrial uses are able to exist in close proximity to each other. While not an exhaustive list, particular consideration will be given to: safety and security; the layout, orientation, access, servicing and delivery arrangements; design quality, public realm, visual impact and amenity for residents; vibration and noise; and air quality, including dust, odour and emissions.



Figure 2.13: King's Cross Central

What are the benefits?

- There is the potential to make better use of land in close proximity to rail stations in the east of the borough;
- There is the potential to create a significant amount of residential development with no net loss of employment floorspace;
- New residential development could be used to provide active, attractive and safe routes to the Lee Valley, addressing existing barriers to movement and making the Lee Valley Regional Park more accessible to all of Enfield's residents;
- The creation of mixed-use communities offers the potential to reduce the need for travel with people living within walking and cycling distances of their workplace; and
- The introduction of a mix of uses and the improvement in the quality of the environment could also attract a more diverse mix of employment uses, including cleaner industries and more skilled jobs.

What are the challenges?

- 2.11.10 Similar to the emerging option on transport corridors, not all of Enfield's industrial land has good access to social and public transport infrastructure. Some forms of development, such as multi-storey industrial buildings are relatively untested in the UK and there is a risk that the market may not wish to bring this type of development forward. Care will need to be taken to ensure that the introduction of residential uses does not compromise the operation of businesses. For example, the routing of industrial traffic will need to be carefully considered and controlled. More work is needed to understand the impact of these uses in practice.

2.12 Strategic plan-led approach to Green Belt

- 2.12.1 In Enfield, regard has to be had to how diverse the the Green Belt is, and the different types of uses undertaken within it. Notwithstanding a firm protection of Enfield's Green Belt there is the possibility within our Green Belt to provide an accessible and sustainable option or options to help meet our growth challenge. This is particularly the case where if such development is well connected to the borough's public transport network taking into account planned improvements and upgrading.
- 2.12.2 There are strong sustainability arguments in favour of developing some green belt land. For example, the existing settlement around Crews Hill station has the greatest potential to act as a hub for sustainable growth. The surrounding area, has good access to Crews Hill station, which could provide a highly accessible location for new residential suburb, reducing reliance on the private car. This would be a factor for consideration when undertaking any Green Belt review.

How should growth be delivered and what form would it take?

- 2.12.3 It is essential that there is a planned approach to any question of development of current Green Belt land. New Green Belt boundaries would need to be reviewed in accordance with the principles set out in the NPPF, whilst taking account of long term needs beyond the plan period. We need to protect the existing northern urban edge of Enfield from sprawl and this may mean maintaining a Green Belt to the north of this. We need to ensure that the right level of infrastructure is in place to support development and this means ensuring that proposals are viable and the right delivery mechanisms are in place.
- 2.12.4 It is too early to suggest the particular form of development because we need to see the results from the Call for Sites before determining the quantum of development which will need to be accommodated on existing Green Belt land. Accordingly, a number of studies will need to be undertaken to inform the Council's view whether there is a case for exceptional circumstances to justify changes to the Green Belt boundaries.
- 2.12.5 Nevertheless, in a borough experiencing high population growth and with so many competing demands on available land, it is important that the option of taking a strategic plan-led approach to Green Belt is considered.



What are the benefits

- Development of these sites would reduce pressure on existing communities;
- Reduce the need for denser development on existing urban and suburban character if new development is spread through Enfield;
- Sites are unlikely to be in multiple-ownership making them potentially easier to assemble and deliver;
- Locational characteristics could deliver much needed lower density family housing typologies and affordable housing priorities;
- Individual sites are comparatively large and therefore development for housing and associated community facilities could be brought forward relatively quickly and efficiently; and
- The type and layout of development could help to encourage access to the countryside by both residents of existing settlements and the rest of Enfield who would be able to access the facilities that accompany new development.

What are the challenges?

- Development would need to be tightly controlled to prevent sprawl and protect areas that still meet the requirements for inclusion in the Green Belt;
- In addition, the development would need to be assessed to ensure that it did not have an unacceptable visual impact on the surrounding countryside;
- Development would need to be of the highest quality in order to ensure that any new settlement was sustainable and that ecosystem services, such as flood mitigation are retained;
- New physical and social infrastructure would need to be planned, funded and programmed in order to ensure that any new development is sustainable and does not result in excessive traffic generation; and
- A full assessment of the economic impact of development would be needed.



Figure 2.14: (left and above) High quality and variations in housing development as part of a comprehensive masterplan for an urban extension in Harlow

2.13 Future Crossrail 2 growth corridors

- 2.13.1 The proposed Crossrail 2 route, which runs through Enfield's eastern corridor and the wider Upper Lee Valley could deliver early Four Tracking of the West Anglia Mainline to provide a four train per hour service into the new Meridian Water Station, Ponders End, Brimsdown and Enfield Lock Stations from 2028. The potential of this strategic infrastructure project will help to unlock and accelerate delivery of new development sites which will in turn deliver much-needed new homes, jobs and economic growth. The arrival of Crossrail 2 in the early 2030s will significantly improve connectivity and accessibility to Central London and will provide an attractive proposition to investors, creating value and acting as a catalyst for further new homes and jobs in the Crossrail 2 corridor and the surrounding areas. Enfield has strategic land allowing the potential to develop more sustainable, high quality communities in close proximity to central London, the M25 and Stansted Airport.
- 2.13.2 The spatial strategy for growth will maximise the benefits of being located in the London-Stansted-Cambridge Innovation Corridor through the review of the Upper Lee Valley Opportunity Area Planning Framework (OAPF), and the new opportunity growth area in New Southgate connected to the proposed high frequency rail line of Crossrail 2 and associated road infrastructure investment. The arrival of Crossrail 2 will offer increased capacity and reduced journey times. Increasing Enfield's connectivity will support the borough's growth objectives to create more housing and jobs, stimulating significant economic benefits.
- 2.13.3 The arrival of Crossrail 2 in Enfield is expected to be operational by 2033 that will drive economic growth in the Lee Valley and New Southgate corridors enabling significant development and regeneration in Enfield resulting in huge transformation for the borough.
- 2.13.4 This new Local Plan will seek to enhance development and connectivity at transport nodes. The Stratford to Angel Road (STAR) Enhancement Project, West Anglia Mainline Enhancement Project, and future Crossrail 2 proposals at New Southgate and in the eastern part of the borough are all rail projects that will dramatically improve rail frequency and capacity over the plan period increasing the opportunities for new development. Crossrail 2 in Enfield would support the delivery of a significant number of new homes and jobs beyond the plan period to meet a strong and increasing housing demand alongside a dynamic and flexible approach to Enfield's industrial land along the eastern corridor.
- 2.13.5 Crossrail 2 is anticipated to be confirmed in 2022 and the current business case being made to the government outlines Enfield would need to provide a further 40,000+ new homes out of the 200,000 homes to be realised through land released by Crossrail 2. Enfield's early modelling studies have indicated that a 40,000 housing requirement to make Crossrail 2 a reality for Enfield cannot be met without the strategic reconfiguration of land within the eastern corridor. Much of this land is currently designated as SIL and in a Crossrail 2 scenario will need to work more efficiently and flexibly in terms of the land uses it can bring forward in order to drive forward both housing and economic growth.
- 2.13.6 Fully capturing the regeneration benefits of Crossrail 2 would require a strategic review of the current geography of land uses across the borough and a proactive strategy of relocating and consolidating land uses and optimising new homes and jobs across all the growth locations in this chapter. The draft new London Plan due to be examined in early 2019 is planning for a time period up to 2041 but as it is currently drafted the Plan does not make strategic policy provision for Crossrail 2 to happen. Once confirmation of Crossrail 2 is in place it is anticipated the new London Plan alongside Enfield's new Local Plan would need to be reviewed.
- 2.13.7 Enfield will continue to work with its partners in delivering a business case for Crossrail 2, both in the Lee Valley and New Southgate. Subject to final approval of Crossrail 2, Enfield's new Local Plan will need to respond with providing area-based policies for both the south west and eastern opportunity areas corridors.

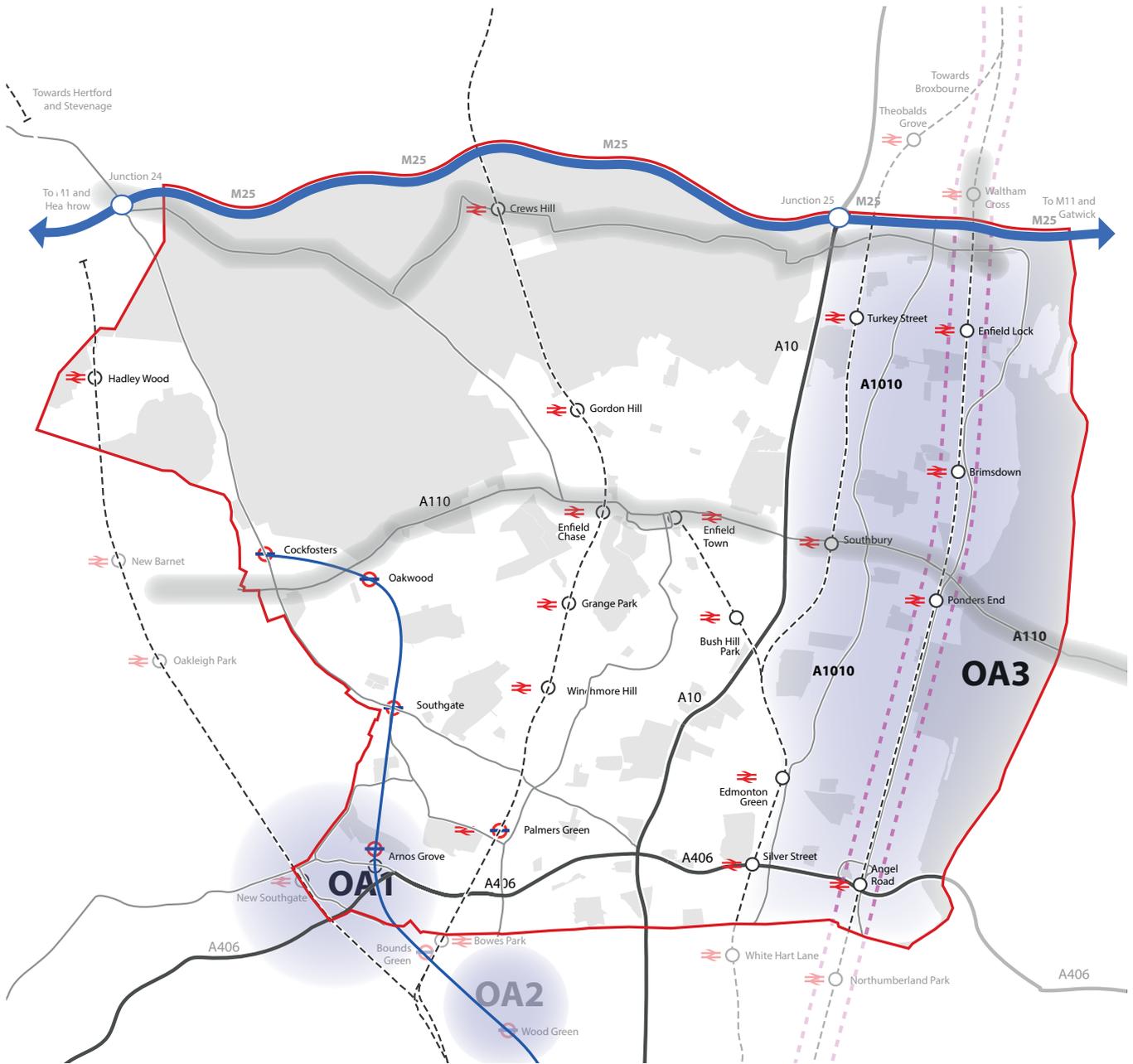


Figure 2.15: Future growth corridors and opportunity areas

Key

- Enfield borough boundary
- Railway
- Primary road
- National Rail station
- London Underground station
- Piccadilly line
- Open space

- Crossrail 2 growth corridor
- Opportunity Areas** (as identified in the draft new London Plan (2017))
- OA1** New Southgate
- OA2** Wood Green / Haringey Heartlands
- OA3** Upper Lee Valley

2.14 Opportunity Areas

New Southgate

2.14.1 The Council will work with the Mayor of London to bring forward the Opportunity Area Planning Framework (OAPF) for New Southgate. Alongside Crossrail 2, the Council will also seek to secure an enhanced Crossrail 2 Station at New Southgate and road improvements along the A406 to include further feasibility of tunnelling with the aim of improving air quality and increasing access to transport hubs that will encourage active travel..



Figure 2.17: (top) Ladderswood Estate completed, as seen within the New Southgate area

Upper Lee Valley

2.14.2 The Lee Valley already represents one of London's major growth corridors in the London and the wider south east region. With the anticipated confirmation of Crossrail 2 there is an urgency to bring forward an early refresh of the Upper Lee Valley OAPF (the current version was adopted in 2013) to re-examine the full benefits phased rail infrastructure investment can bring to Enfield's eastern corridor and the relationship of this corridor to the rest of the borough. This includes:

- Addressing the severance and congestion caused by level crossings in North East Enfield;
- Improvements to the M25 corridor and internally enhancing east – west connectivity across our borough; and
- 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.

2.14.3 The planning framework should look to reconfigure, relocate, consolidate, intensify and optimise the efficiency of SIL making it work harder through efficient uses and intensification policies aligned with the London Plan.



Figure 2.18: (right) aerial photograph of parts of the eastern corridor, Enfield

2.15 Do noting is not an Option

- 2.15.1 Each of the potential options has its strengths and weaknesses. However, not considering any option is not considered a realistic option in the context of the Council's national and regional obligations in preparing its Local Plan.
- 2.15.2 National planning policy indicates the Council must plan to meet objectively assessed housing need and this point will be tested at Examination. The Mayor of London may object and there is a risk that a Planning Inspector may find the Local Plan to be 'unsound' i.e. reject the Plan, so that it could not be adopted.
- 2.15.3 Meanwhile, developers may exploit the situation by advancing housing proposals on unsustainable sites, resulting in 'planning by appeal'. This means that the Council's refusal of such applications are overturned at appeal because the Local Plan is not up to date and does not contain a credible housing strategy to seek to meet housing need to the fullest extent possible. Consequently, housing schemes may proceed, but in an unplanned way on sites not preferred and identified by the Council and public.
- 2.15.4 The consideration of all options will help the Council to identify sufficient housing land and supply to provide for full need and add significantly to capacity and help demonstrate that the Council is doing everything it can to meet demand. The Council will also support the development of non-strategic sites identified through its Strategic Housing Land Availability Assessment.

“

At this stage, the Council has not come to a view about which strategy (or strategies) is the most appropriate. We wish to know the views of residents and stakeholders before coming to decision. This includes a number of questions that the Council is keen to hear views about, but equally you are welcome to include comments about any other aspects of this Plan.

Have your say...

www.enfield.gov.uk/newlocalplan ”



3 Enhancing heritage

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Support high rise development, and recognises that higher density development can contribute to minimising the need for new development land

Support growth options in principle but needs to carefully consider its potential impacts on the management of the historic environment

What respondents said about heritage as part of the 2015 Consultation and Enfield Conversation

The quality and character of the borough and individual areas within it is greatly appreciated and should be sustained and enhanced

Quality of life, as well as enjoyment of and access to local green space and conservation areas is of great importance to residents and this should be preserved and enhanced

A robust evidence base needs to be developed on the historic environment of Enfield to support the Local Plan as well as a positive strategy for the conservation and enjoyment of the historic environment, demonstrating how, when and by whom Enfield's heritage will be utilised, protected and enhanced

Development is supported and needs to be delivered without compromising assets

Archaeological Priority Areas need to be fully considered as part of major development growth



3 Enhancing heritage

3.1 Introduction

Enfield's Heritage

- 3.1.1 This section sets out why heritage is important, how Enfield's built, and designed landscape heritage came about, heritage's role in growth, heritage's contribution to quality placemaking, understanding significance, the role of managed change, community involvement and engagement. Enfield's heritage is a defining feature of the borough. It is at the heart of Enfield's success as a popular place to live, work and spend leisure time. Heritage can support growth and act as a catalyst for regeneration. It is central to high quality place making and helps to create a sense of place, anchoring new development and communities.
- 3.1.2 Heritage can include buildings, design, landscapes, archaeology, cultural practices and more. Heritage and Society 2018 (Historic England) identifies that the historic environment is enjoyed by millions. Members of the public deeply value the historic environment. It is important for our health and wellbeing. It creates a strong sense of place, influences how we perceive places and brings people together. The historic environment inspires learning and understanding. The Council's priorities are to manage heritage to support the growth agenda, engage local communities and attract inward investment.
- 3.1.3 Distinctive topography has shaped the borough, leading to industrialisation around the Lee Valley in the east and extensive green space and residential development taking up much of the hillier west.
- 3.1.4 Connectivity is important and the connections between urban London and rural Middlesex have shaped much of the borough's form, with strong axial links to and from the capital crossed by the North Circular (A406) and M25. Rail, tube and waterways have all contributed to a distinctive urban and rural form that unites very different development typologies in one single borough.
- 3.1.5 Through this all Enfield has developed around a number of town centres, with grand estates, smaller planned and incremental settlements, extensive areas of housing and built and natural landscapes all contributing to its historic built character and urban and landscape form.
- 3.1.6 Heritage is recognised as dynamic and evolving. Values change, and hidden significance may emerge. Heritage in Enfield is about more than standing structures and designed landscapes. It may be reflected in patterns of land use or community and cultural practices as much as key historic structures. Creative approaches will be required to ensure that those are recognised and integrated into high quality place making.



Figure 3.1: Arnos Grove station

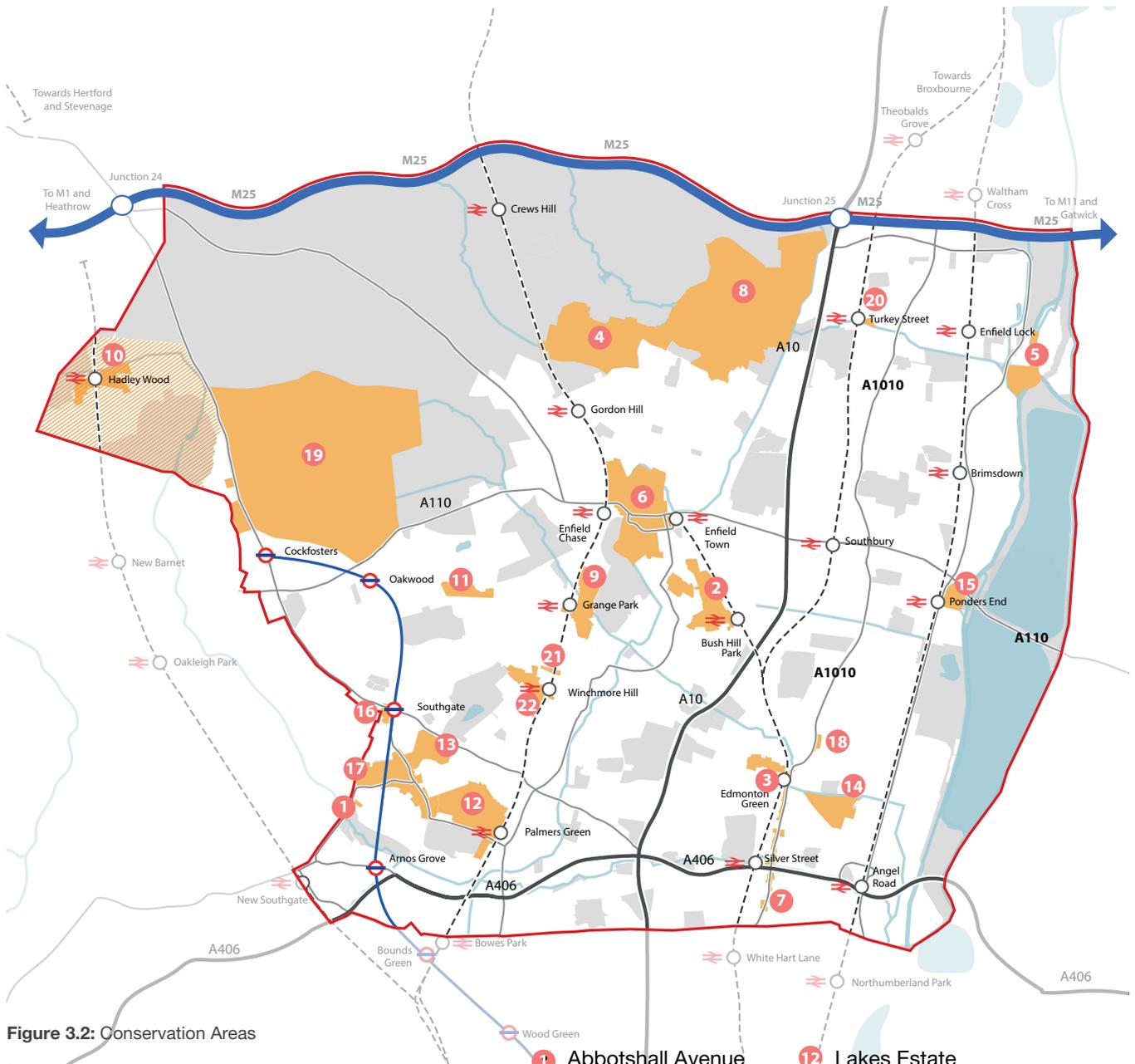


Figure 3.2: Conservation Areas

Key

-  Hadley Wood Neighbourhood Planning Area
-  Conservation Area

- | | |
|------------------------------|-----------------------------------|
| 1 Abbotshall Avenue | 12 Lakes Estate |
| 2 Bush Hill Park | 13 Meadway |
| 3 Church St, Edmonton | 14 Montagu Road Cemeteries |
| 4 Clay Hill | 15 Ponders End Flour Mills |
| 5 Enfield Lock | 16 Southgate Circus |
| 6 Enfield Town | 17 Southgate Green |
| 7 Fore St, Edmonton | 18 The Crescent |
| 8 Forty Hill | 19 Trent Park |
| 9 Grange Park | 20 Turkey St |
| 10 Hadley Wood | 21 Vicars Moor Lane |
| 11 Highlands | 22 Winchmore Hill |

- 3.1.7 In the forthcoming plan period, Enfield faces intensive and extensive demand for growth in terms of housing, jobs and infrastructure to serve them. To address this, the Council will ensure that heritage is integrated into all Plan proposals and is committed to combat inequalities, drive forward regeneration, increase the supply of housing; drive investment in rail, roads and cycling infrastructure and create an enterprising environment for businesses. .
- 3.1.8 To encourage high quality place making, heritage needs to be properly understood, conserved and enhanced. The Council wants heritage to be used as the catalyst and driver for successful regeneration and new growth, for building thriving new communities, for encouraging inward investment, and for associated increases in jobs and standards of living for all residents in all parts of the borough.
- 3.1.9 The Council wants new development to be of a quality that creates the valued heritage of tomorrow. It is vitally important that Enfield uses future development to improve and add to its heritage, better to reveal its significance and to make it more accessible for current and future generations. Exceptional design can enhance an existing heritage asset or make a new building, object or place that becomes a valued heritage asset of the future. Design quality also enables new development to enhance the setting of historic structures or landscapes. The informed design of new additions or alterations to heritage assets can ensure that what is significant is better revealed and understood and not lost in the process.
- 3.1.10 Positive management of the borough’s heritage relies upon an understanding of its significance as well as high quality new design. Existing Characterisation Studies, Conservation Area Appraisals and Management Proposals, Tall Buildings Policy and Town Centre studies or masterplans as well as the Local Studies Library and Archive and Greater London Historic Environment Record can be used to further understanding of historic development patterns and heritage significance, including above and below ground archaeology.
- 3.1.11 It is recognised that design quality can contribute much to conserving and enhancing heritage as part of good growth. There may, however, be places in the borough where certain forms of development such as tall buildings will be inappropriate or instances when proposed alterations to a historic structure or landscape will cause harm. To continue to conserve and enhance the borough the Council will determine proposals for growth or alteration consistent with the asset’s significance. Communities across the borough are engaged with its heritage in different ways. Local conservation study groups and The Enfield Society worked with the Council on the Local Heritage Review, but many other groups and organisations are engaged with different expressions of heritage in less formal ways. The role of memory and storytelling in place making and heritage is expressed through oral history and reminiscence projects, faith practices, trails, festivals and events. This work is supported by the Council’s Museum and Local Studies Library and Archives services. The Council will continue to explore how diverse communities engage with local heritage and create a sense of place as the borough grows.
- 3.1.12 Heritage, design and place making therefore have an important role to play in maintaining and building Enfield as a home of distinctive, inclusive communities. Making local places into a vibrant, shared venture, engaging Enfield’s existing population as well as newcomers and in redressing past inequalities. Enfield’s heritage is dynamic and constantly added to as the borough evolves and interactions between local people and assets change. Heritage is therefore about positive management of change making positive use of heritage assets and their settings for regeneration and placemaking engaging communities and promoting design quality.

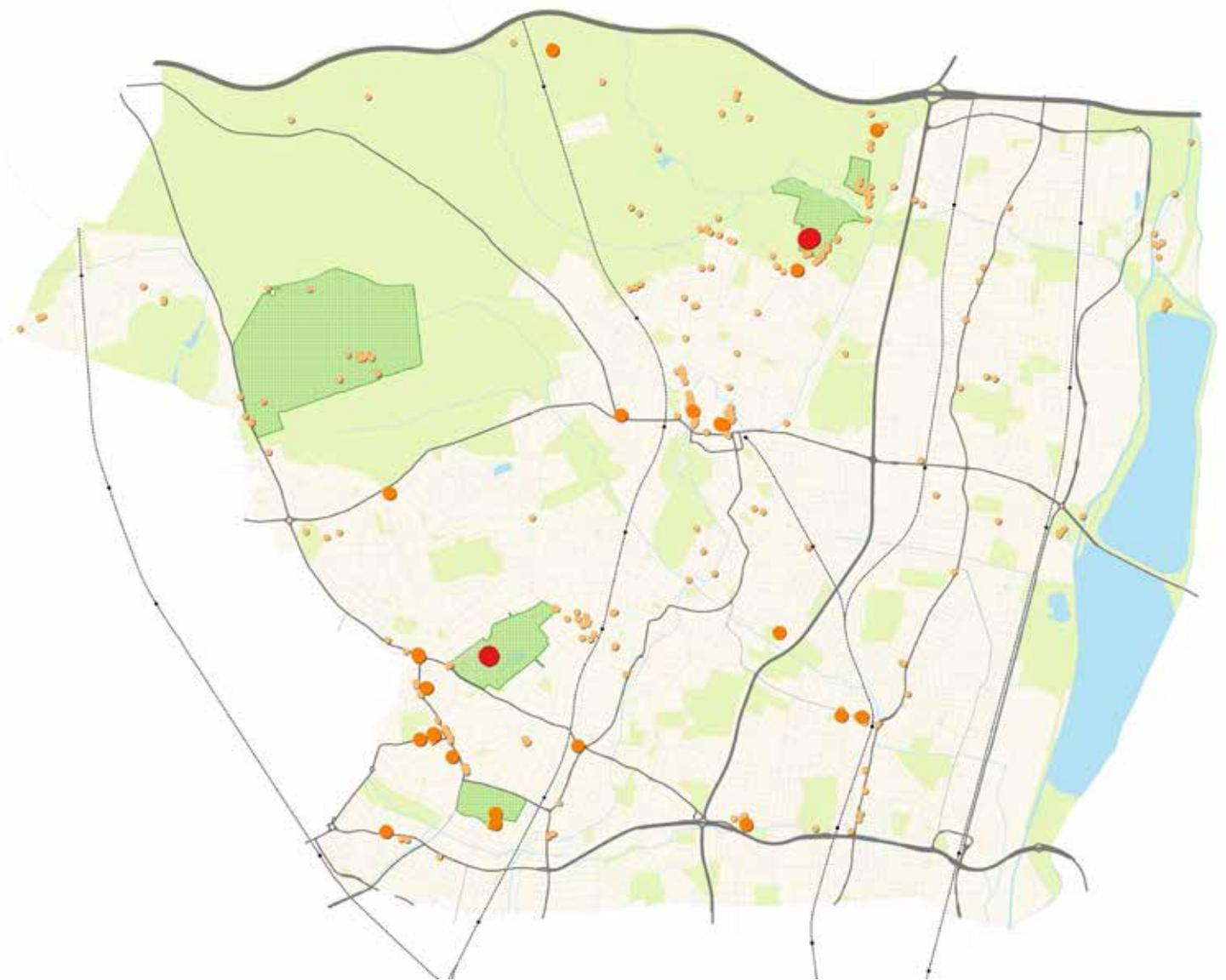


Figure 3.3: Listed buildings and registered parks and gardens

Key

-  Listed building or group
-  Registered parks and gardens

Listed building or group

-  I
-  II*
-  II

3.2 Design quality and local character

Historic built and natural environment assets

- 3.2.1 This section sets out key facts relating to the borough’s heritage and the evidence base supporting plan making for the historic environment.
- 3.2.2 Built and natural environment assets, the settings in which these assets are experienced, and local collections are all part of the borough’s heritage assets. At the time of writing, Enfield has:
- Five Scheduled Ancient Monuments;
 - 22 conservation areas;
 - 5 registered parks and gardens of special historic interest (Forty Hall, Trent Park, Broomfield, Myddleton House and Grovelands);
 - Approximately 480 statutorily listed buildings;
 - A Local Heritage List which identifies 262 local landmarks and landscapes;
 - 25 areas of archaeological importance;
 - A wealth of heritage assets which are neither listed, designated or registered but are nevertheless important, including extensive waterways and assets representing Enfield’s rich industrial past; and
 - Extensive collections in the Council’s Museum and Local Studies Library and Archives services.

3.2.3 Good design, alongside informed heritage work together to create well-designed places and positively add to existing character and contexts. These designated and undesignated heritage assets form a critical part of the borough’s unique character and will be used to support development that creates and consolidates an identifiable sense of place.

3.2.4 In relation to our evidence, there are two borough-wide Characterisation Studies of 2008 and 2011. Conservation Area designation for Enfield were revised in 2008 and confirmed as part of a recent review of appraisals and management proposals in 2015. There are approved Character Appraisals for each of the conservation areas which sets out what is of significance about those areas. In accordance with S71 of the Planning (Listed Buildings and Conservation Areas) Act 1990 there are also Management Proposals for each area which set out how the conservation areas can be enhanced. Conservation Area designation area supported by Article 4 Directions bringing domestic permitted development under planning control.

3.2.5 The Local List was reviewed by the Council in collaboration with the Enfield Society and undertaken by community volunteers and a new list was published in 2017. Areas of Archaeological Importance were assessed with Historic England as part of the production of the Development Management Document in 2014. A new draft Heritage Strategy (to replace the previous 2008 Strategy) has been prepared in collaboration with local stakeholders and is being consulted upon alongside Enfield’s new Local Plan, in Autumn 2018. Strategic policy for Enfield’s heritage is amplified in the Heritage Strategy: Making Enfield, which will be adopted as Supplementary Planning Document (SPD). This locates heritage in the context of policy and practice and sets out how the Council will direct resources, manage heritage to support the growth agenda, engage local communities and attract inward investment.

Figure 3.4: The Crescent, Edmonton



SOUTHGATE

A1003 NEW SOUTHGATE 1 1/2
FINCHLEY 3

A1004 BARNET 3 1/4
POTTERS BAR 5 1/2

PALMERS GREEN 1
LONDON 8 A1004

INN
KEEPING
- with -
TRADITION

Main
Entrance



3.2.6 Gaps in the evidence base for the historic environment have been identified. These include recognition of the significance of waterways to the historic development of the borough, particularly in the east. Enfield has an unusual number of very significant historic waterways including the River Lee, the C18th Lea Navigation and the C17th New River all central to the development of London and Enfield. A network of cycle and footpaths and heritage walks recognises and makes positive use of these assets.

Conserving and enhancing the valued design character of Enfield

- 3.2.7 This section identifies our approach to regeneration opportunities and neighbourhood planning.
- 3.2.8 In an effort to understand and utilise conserve and enhance the valued design character as part of the heritage of the borough, the Council has undertaken two Characterisation Studies (in 2008 and 2011) These studies identify typologies for guiding growth, including the type of built form, the type of development, and the different housing mix and densities most likely to support and enhance local character in each area. In addition, conservation area appraisals and management proposals identify the significance of different components of the conservation area and opportunities for enhancement.

Promoting heritage-led regeneration

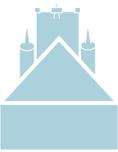
3.2.9 Heritage assets can help to foster place attachment and create a sense of place. As the borough grows, heritage can be used to anchor new development and mediate between old and new. Heritage-led regeneration will ensure that heritage assets are conserved and integrated into vibrant new development that conserves and enhances their character. A holistic approach to planning and regeneration offers the best opportunity to integrate heritage assets into new development.

Recognising the community value of local heritage

- 3.2.10 Where new development can be guided by Neighbourhood Planning and/or Community Building Schemes, this can provide significant opportunities for ensuring community ownership and beneficial use of local heritage assets and settings. Both can be powerful tools in promoting development which furthers the conservation and enhancement of local heritage assets and their settings. A Neighbourhood Plan can help to guide how local heritage can be conserved, whilst adapting it to modern needs and integrating it with new development. It can help to provide a new development, regeneration project or community led initiative with a common narrative and identity, Assets of Community Value may be associated with the heritage of a particular community in Enfield or of a particular land use. Retention and refurbishment could allow community engagement with a wider project of regeneration.
- 3.2.11 Even where there is no remaining built heritage there will be opportunities for links between the historic environment heritage, regeneration and placemaking, to underpinning the identity of new places with character inspired by the borough’s rich heritage. For example, the role of the waterways and how they can contribute to Meridian Water.



Figure 3.5: Monmouth Green



HE1 Draft policy approach: Design quality and local character

The Council will ensure that heritage anchors new development, defines and connects communities as part of the transformative change and growth agenda.

The Council will ensure that projected growth in the forthcoming plan period helps to conserve and enhance the quality and character of Enfield's historic environment and heritage assets and their settings, in line with relevant national and London Plan policy, legislation and best practice guidance.

The Council recognises Enfield's heritage as equally stemming from and represented by assets located in all three original boroughs (Enfield, Edmonton and Southgate) and diverse character areas (including inter-war suburban areas that developed around the Underground railway / Piccadilly line, traditional market town areas, historical urban areas and suburbs, and planned settlements). All heritage assets and aspects from all parts of the borough are recognised as important, worth protecting and enhancing and as an opportunity to inform and contribute toward well-designed places.

We will expect development proposals to:

- Make a positive contribution to the borough's regeneration, character and future architectural heritage; and
- Demonstrate a clear understanding of the borough's unique heritage and how proposals will conserve and enhance that character, using available published and archival resources including the GLHER.

The Council is particularly committed to working with residents in parts of the borough where heritage may be scarce or under represented, to reduce inequality across the borough and build settled communities.

Planning should contribute to conserving and enhancing the built and historic environment as part of its overarching environment objective towards achieving sustainable development, in line with the NPPF and the London Plan.



Figure 3.6: Museum exhibition toys

3.3 Designated heritage assets

Their settings and archaeology

- 3.3.1 Designated Heritage assets are defined in the Government’s National Planning Policy Framework as World Heritage Sites, Scheduled Ancient Monuments, Listed Buildings, Registered Parks and Gardens of Special Historic Interest, London Squares and designated Conservations Areas.
- 3.3.2 For Enfield, it is important to view appropriate treatment of conservation areas, listed buildings and other heritage assets not only as benefiting the amenity of the area overall but as also presenting economic benefits to the individual owners or developers. This can for example be seen in the uplift to house values in conservation area suggested by some studies.
- 3.3.3 It is also important that the economic value attached to local heritage assets, especially when they are well preserved and within a sympathetic setting, enables diverse communities to be retained and evolve with the built environment. One of the keys to this is allowing for everyone in the local area to engage with heritage assets in the built environment.



Figure 3.7: Salisbury House



Figure 3.8: St Johns, Palmers Green



HE2 Draft policy approach: Designated heritage assets, their setting and archaeology

The Council will aim to conserve and enhance the character and appearance of the borough's heritage assets in accordance with the following:

- a) Development affecting heritage assets will only be supported with relevant evidence and undertaken in a manner appropriate to the asset's significance;
- b) Great weight will be given to the asset's conservation and consideration of harm will be weighed against all other material considerations;
- c) Proposals should be sympathetic to and respond to the setting of local heritage assets. Proposals that would significantly harm the setting of a local heritage asset will be refused.

In the case of proposals affecting a designated heritage asset, its setting or a property within a conservation area, applicants must provide a Heritage Statement to demonstrate:

- The significance of heritage assets affected by proposals;
- The contribution made by their setting;
- The extent of the impact of the proposal on the significance of any heritage assets affected; and
- Any supporting information required to assess the impact of proposals.

Intelligent design will be required to ensure that any planned changes conserve and enhance the heritage value of an asset and its setting rather than diminishing this.

When considering the impact of proposals, there should be regard to cumulative effects of minor changes on heritage assets.

Heritage assets at risk will be identified through the Historic England heritage at risk register. Appropriate measures to remove the asset from the at-risk register will be identified through an action plan. Proposals need to have regard to relevant actions as identified.

Where a proposal affects archaeological remains, developers should mitigate harm as appropriate in relation to the significance of the remains and record evidence to be deposited with the Greater London Historic Environment Record and the local archive.

3.4 Locally listed and undesignated heritage assets and cultural practices

- 3.4.1 Locally listed buildings and landscapes as well as undesignated assets and cultural practices can play an essential role in forming and reinforcing a sense of local character and distinctiveness in Enfield’s historic environment.
- 3.4.2 In some cases, the importance of a local heritage asset, whether designated or not, can be linked with a certain use or purpose or with cultural practices linked with it. This could for example be a public house or a local place of worship which, in addition to its central function also has a purpose and significance at the centre of a local community, as a meeting place and as a venue for local gatherings and activities. These uses and the associated interaction of the public with the building may all combine to be as significant as the building itself in representing and demonstrating local character and therefore constitute a significant loss to local heritage and culture, even if the building is retained.



HE3 Draft policy approach: Locally listed and undesignated heritage assets and cultural practices

The Council recognises that locally listed and other undesignated heritage assets, as well as certain uses associated with some buildings, can make important contributions to the borough’s heritage and are therefore in need of recognition and protection.

Proposals for change will be decided by taking a balanced judgement, having regard to the significance of the heritage asset and the scale of any harm or loss.

We will expect development proposals to:

- Enhance and protect local heritage and cultural assets and cultural practices; and
- Aim to increase public access to and understanding of designated and undesignated heritage assets.

Where the significance of the local heritage asset is linked to its use or original purpose, the development should take this into consideration.



Figure 3.9: Historic Fingerpost

Non-designated heritage assets are a material consideration and it is part of the council’s duty enshrined in national and London Plan policy and guidance.

3.5 Views

- 3.5.1 Views to and from a natural or built environment heritage asset can be part of its setting. Therefore, the setting of an asset can extend far beyond its immediate surroundings. In Enfield, important views can include short and long-distance views to and from particular heritage buildings and conservation areas as well as to and from waterways, greenbelt land, local urban areas and central London.
- 3.5.2 The Enfield Characterisation Study identified a number of key characteristics of the borough in association with views. Important local views (longer distance views) identified as part of a subsequent report were: Barn Hill, King's Head Hill, Mansfield Park, Broomfield Park, The Ridgeway (A1005), Whitewebbs Lane, Rammey Marsh, Clay Hill, Approach to Enfield Town, Ponders End, Meridian Water, New Southgate and Forty Hall.
- 3.5.3 Many of the tall buildings in the borough also surveyed as part of this study do not accord with current aspirations for design quality and siting and are considered as being located in sensitive or inappropriate locations. This has understandably led to a perception that accommodating tall buildings that positively enhance the character of the borough is challenging and drives additional concern over their impact on important views and sensitive settings.



Figure 3.10: Lakes Estate Conservation Area



HE4 Draft policy approach: Views

The Council will ensure the protection of strategic and local views, especially at important gateways and along key routes.

All proposals, including those for tall buildings, will be assessed regarding their impact on views, these include:

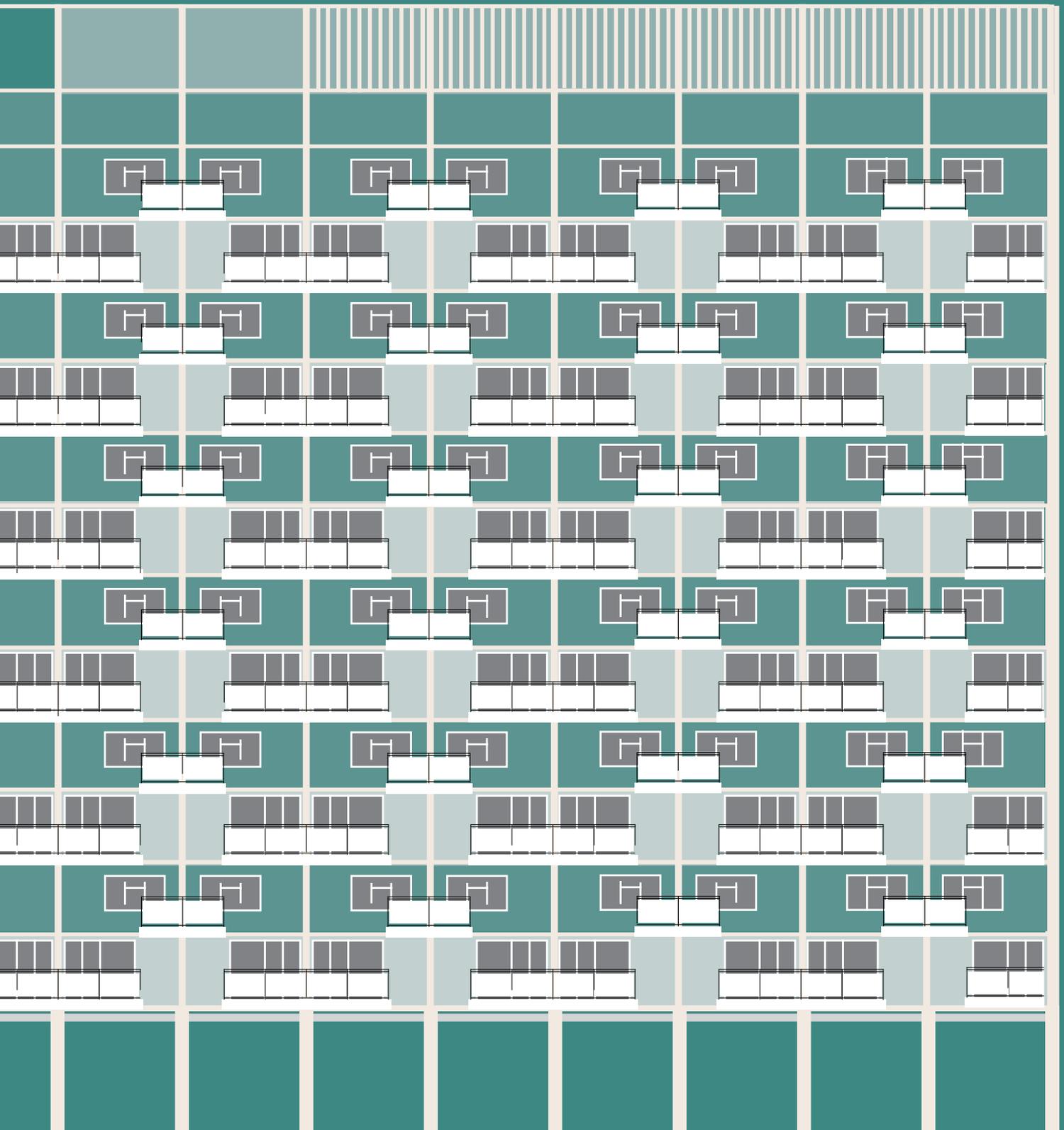
- Within the boundary or in the immediate vicinity of, or along views to, or from designated heritage assets including conservation areas; statutorily or locally listed buildings; scheduled or locally listed ancient monuments; and statutorily or locally registered historic parks and gardens;
- In other locations where development would infringe upon or detract from important strategic or local views; and
- On ridges or other areas of high ground where they would have a significant impact on the horizon.

As part of this assessment, the Council will require applicants to submit accurate visual representations of the proposal as seen from the surrounding area, including from agreed points within important local views.

A proposal will only be acceptable where the applicant can demonstrate that it does not harm the views identified.

The London Plan requires boroughs to identify local views and give local views the same degree of protection as strategic views. The Council did not consider an option of less protection of local and strategic views as a result.

The Council recognises, in line with the new London Plan's more relaxed attitude towards densities, that higher densities, and in some cases tall buildings, will be necessary to deliver the housing numbers required of the borough.



4 Design excellence

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There is a need for providing truly affordable new development, which is designed to meet needs of families, older people, those with disabilities, young single people, and key workers

Issues of overcrowding and poor quality housing need to be addressed and prevented

Development that supports and builds sustainable communities, community cohesion and enhancement of existing urban areas should be promoted

Quality of life as well as enjoyment of and access to local green space and conservation areas is of great importance to residents

A preference for options which avoid building on Green Belt land or Metropolitan Open Land, especially where this is greenfield land, urging caution that such development should be pursued as a last resort, once all other growth options had been exhausted

Concerns about addressing inequalities were voiced

Housing quality and mix is important but the character of the borough and of individual areas within are greatly valued and should be sustained and enhanced

Whilst there were concerns regarding high rise development with preference towards lower density development and houses, many recognise that higher density development can contribute to minimising the need for new development land

What respondents raised as part of the 2015 Consultation and Enfield Conversation



4 Design excellence

4.1 Introduction

- 4.1.1 Design is at the heart of the way residents live, work and enjoy using local places. Delivering high quality, well-designed places across the borough is a fundamental priority for the Council and the key theme underpinning and enabling the growth projected for this upcoming plan period.
- 4.1.2 Enfield currently faces unprecedented pressures for growth that will require fresh approaches to accommodating development including at higher densities throughout the borough. This brings with it additional challenges, including developing in areas with an established, valued local character, some of which have seen very little development in a long time. Design will play a critical role in helping to reconcile the high levels of growth and densification necessary in the forthcoming plan period with the need to preserve and enhance the borough’s character, heritage and natural assets and to redress inequalities.

4.2 Achieving design excellence

Design character

- 4.1.3 Character is a fundamental aspect of what makes a place unique and special. It is of particular importance in ensuring the borough is a valued and distinctive part of London as well as ensuring the individuality of the neighbourhoods within it. The borough’s overall characteristics range from dense urban and suburban residential areas to rural countryside, reflecting Enfield’s position between urban London and Hertfordshire. Nurturing and supporting both the borough’s rural and urban identity and characteristics, and the links to neighbouring areas, is of equal importance.
- 4.1.4 Another central part of the borough’s character is its rich natural and historic environment, with many buildings and areas of historic and architectural value as well as extensive greenbelt, parks and other open land. Over a third of the borough is designated greenbelt that makes a significant contribution to its unique character. The importance of preserving and enhancing the borough’s context, and especially its historic and natural environment, was the focus of many respondents to previous rounds of consultation.



- 4.1.5 This does not mean that there should be no development, or that all new development should be located far away from natural and historic borough assets and comprise low density, unimaginative replications of historic design precedents. A combination of old and new buildings, and the implementation of good urban design principles will create positive, well-designed places for Enfield's future. Innovative, high quality design must be realised to ensure new development that respects and integrates existing character, assets and settings, while also constituting high quality contemporary architecture. This is a key factor for successful placemaking as well as a key challenge.
- 4.1.6 To help meet this challenge, the Council has undertaken two characterisation studies to understand, protect, utilise and enhance the valued characteristics of the borough. These studies identify the key aspects and qualities of the built form and varying contexts across the borough. They also help to identify and develop suitable typologies for growth, including the type of built form, the type of uses, and the different housing mix and densities most likely to support and enhance local character in each of the borough's individual character areas.
- 4.1.7 Striving for design excellence is crucial for all types of development, whether building or open space, regardless of tenure, use or ownership. A very important part of this is the interrelationship between buildings and public and private open spaces.
- 4.1.8 The number of design awards received for recent Council led development show the Council's ambition to put its promotion of innovative contemporary design into action. Design Awards received include the RIBA National Award 2017, RIBA London Award 2017 and RIBA London Client of the Year 2017 for Dujardin Mews, recognising the council's recent achievements to realise excellence in design within Enfield and raises the bar for design quality across the borough.

Place and Design Quality Panel

- 4.1.9 The Council has recently established a Place and Design Quality Panel to support its aspirations to raise design quality across the borough and respond to the unique characteristics identified for different borough areas, when planning new development.
- 4.1.10 The Place and Quality Panel will play an instrumental role in developing the Council's design framework. The Panel will provide local design review arrangements in line with the NPPF to provide the ability for early engagement on design as well as assessment and support to ensure high standards of design. The Place and Design Quality Panel will consider and comment on proposals that have a significant impact on, or establish precedent for, the borough, or have the potential to demonstrate best practice. Regard will be taken to the recommendations of the Panel when assessing planning applications.

Place and Design Quality Panel

- 1 Make Enfield a better place to live and work
- 2 Promote high quality design and sustainable development
- 3 Protect Enfield's unique character



D1 Draft policy approach: Achieving design excellence

The Council will retain, promote and support high quality design and architecture to create attractive, distinctive and liveable places.

We will achieve this by:

- a) Applying all design policies in line with the draft London Plan (Chapter 3), including space and design standards as applicable, to all development across the borough, across all tenures;
- b) Achieving design excellence within all new buildings, alterations to existing buildings, streets and public realm across the borough;
- c) Ensuring that affordable homes are designed to the same or higher standards as the private housing element of new developments. We will expect all residential schemes to ensure the successful integration of homes of different tenure types by taking a tenure blind approach, and pepper potting mixes across a site to provide choice and opportunity of all;

- d) Ensuring that all developments, including large-scale institutions and other large-scale developments, facilitate local movement, public access through the site, sustainable transport choices and easy way-finding;
- e) Ensuring that all new non-residential developments comply with all general design objectives as well as maximising their contribution to the urban environment, positively addressing the public realm through means of enclosure, landscape treatment and the appropriate location and design of parking and servicing, and clearly delineating public from private space; and
- f) Ensure that design elements of a proposal are discussed and ideally agreed on at pre-application stage for major applications.

Figure 4.1: Dujardin Mews, awarded RIBA London Award 2017, and RIBA London Client of the Year 2017





D2 Draft policy approach: Character and density

To contribute towards the regeneration and growth agenda the Council will seek to protect and build on the existing positive character and individual context of the borough and of specific localities within it, including Enfield's rich and varied environment of buildings, landscape settings, areas of historic value and local activity; inferior past design or building practices in the vicinity do not justify repeating these on new developments.

We will achieve this by:

- a) Ensuring that more tall buildings and higher density development are realised in appropriate places in the borough through innovative high quality design, taking into account local character and context. Tall buildings are defined as substantially taller than their surroundings; and
- b) Promoting small scale infill and extension developments to ensure more efficient use of land. Innovative design solutions are required where sites are very constrained in terms of space or relationships with existing structures, buildings or other adjacencies.

The Council will refuse:

- Poor quality replications of historic design precedents. Enfield's Place and Quality Design Panel will clarify where appropriate the essential characteristics of certain built forms or design solutions that would need to be reflected in new development. The cumulative impact of design detail will be taken into account.

- All vehicle crossovers and dropped kerbs that allow for off-street parking and access onto roads unless it can be demonstrated there is no alternative for vehicle rear or side access; no negative impact on existing area character and street scene, on-street parking opportunities, road and pedestrian safety or traffic flow; and no loss of front gardens, grass verges, front garden walls or street trees.

The Council's Place and Quality Design Panel should be used to enable design led, contextual evaluation of sites, their capacity and their most appropriate form of development.

Focus on high quality design which complements existing character is contained both in the NPPF and in the London Plan, therefore no alternatives were considered.

If tall buildings were rejected outright, the borough would struggle to meet its objectively assessed housing need, particularly for affordable housing and the targets contained in the London Plan.

4.4 Design for co-location and mixed use development

- 4.4.1 A critical part of delivering the housing that the borough needs on brownfield land, while increasing densities and building sustainable communities, will be to encourage more mixed-use development and co-locating different types of uses where appropriate. These developments make more efficient use of land as well as benefiting from reduced travel distances where essential facilities and services such as medical centres and schools are integrated with residential development.
- 4.4.2 Co-location can encourage healthier lifestyles through increased walking and cycling and help to reduce pollution and congestion. Additional benefits can include increased safety due to natural day and night surveillance, as well as making places more vibrant and interesting. Where housing is located close to a retail and leisure offer, such as in town centres or above supermarkets or local shopping parades, this can add viability to the local economy.
- 4.4.3 In some cases, mixed use development can propose locating housing near other uses that can be potential sources of nuisance such as noise or smells. The agent of change principle, now enshrined in the draft new London Plan places the responsibility for mitigating any such impacts from existing noise-generating activities or uses on the proposed new noise-sensitive development. For example, if an application proposes residential development next to a pub, live music venue, school or light industrial workshops, the onus is on the applicant to show that they can mitigate any impacts on their proposed new residential units.
- 4.4.4 Without the agent of change principle, as housing pressure on the borough increases, Enfield would risk losing many of its valued non-residential uses and with them a crucial part of its local employment and leisure offer, essential infrastructure and services, as well as vibrancy. This is a process that has already taken place in many parts of central London. If a proposal cannot show to the satisfaction of the council that impacts would be mitigated as part of the proposed development, it will be deemed inappropriate.
- 4.4.5 The Mayor has provided guidance on co-location and intensified use of land in his new Industrial Intensification Primer. This places a strong emphasis on design in helping to protect the health and amenity of residents, as well as ensuring that the valued variety of employment and leisure uses in the capital is not diminished by increased pressure for residential development.

What is the 'Agent of Change Principle'?

The principle places the responsibility of mitigating the impact of noise from existing noise generating businesses on proposed new development close by, thereby ensuring that residents of the new development are protected from noise and existing businesses are protected from noise complaints. Similarly, any new noise generating development, for example a music venue, will need to put in place measures to mitigate noise impacts on existing development close by.



D3 Draft policy approach: Design for co-location and mixed use development

The Council will promote mixed use development and co-location of different uses, taking into account the agent of change principle.

When co-locating residential development or social infrastructure with industrial uses other than B1, we will require exceptional design to make this acceptable and protect health and amenity.

We will expect development proposals to:

To make the most efficient possible use of land, especially new retail redevelopment and developments near town centres and transport hubs, taking into account the character and infrastructure capacity of the area.

All development that does not fulfil this objective will be refused. In the case of retail, co-location with residential, social infrastructure, office space or other appropriate development will usually be required to achieve this.

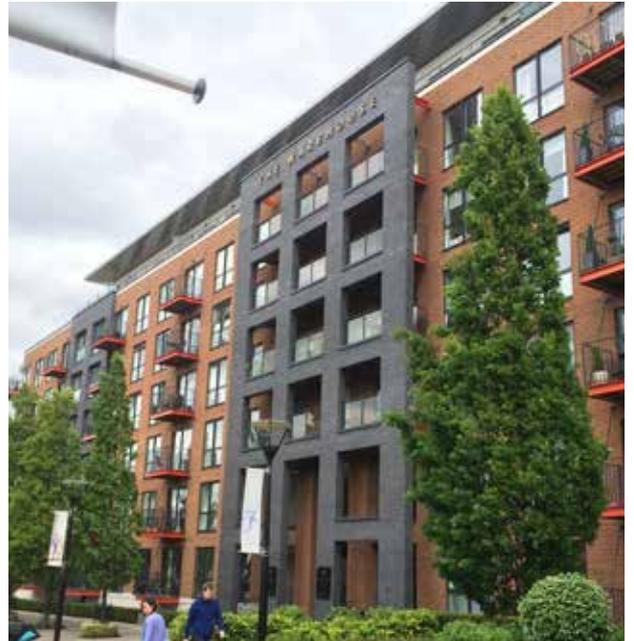


Figure 4.2: Royal Arsenal, Woolwich

The Agent of Change Principle is now enshrined in the London Plan and crucial in ensuring that new development pressures do not result in displacing existing borough uses.

Promoting increased mixed-use development including co-location of less traditional combinations such as housing above schools or supermarkets could be an option to addressing housing needs without loss of greenbelt or employment land.

4.5 Designing a sustainable, safe and inclusive borough

Future proofing

- 4.5.1 When designing new development, especially at higher densities, design standards become an increasingly important factor in ensuring that new development is future proofed, fit for purpose, safe and suitable for a variety of needs and stages of life in all circumstances. For example, higher density housing can be suitable for accommodating a range of housing needs including those of families and the elderly, provided appropriate design standards are followed. Equally, providing a suitable mix of unit sizes with appropriate levels of indoor and outdoor space, of insulation, of safety measures and of accessibility, including lifts where necessary.
- 4.5.2 Sustainable, safe and inclusive design places demands on the overall design and planning of buildings and public spaces as well as on detailing and materials used. Through this approach, design can influence how easy spaces are to use and navigate, for example for a parent with a pushchair or a person with a disability, what behaviours they encourage for example on recycling and travel methods and on resource consumption for water or energy, how much carbon is embedded in materials used and whether recycling of materials was encouraged and what happens with and in a building or space in the case of an emergency, like a fire or terrorist attack.
- 4.5.3 The Mayor's new draft London Plan and Environment Strategy specifically aim to promote growth and development that redresses inequalities and that helps to create a more inclusive, greener and safer city. Draft London Plan Policy D5 states the importance of incorporating wheelchair accessible or easily adaptable housing, with appropriate design standards also applied to external approaches, entrances, communal areas within buildings and external amenity spaces. Inclusive design standards must also apply to all other development, except where this would cause undue harm to the character or setting of designated heritage assets.
- 4.5.4 Safety, security and resilience against emergencies is also a prominent design concern of the draft London Plan, featuring in a raft of draft policies including D1, D3, D8 D10, D11 and GG6 and in associated new guidance on design and safety for tall buildings. Another safety element is the streets and public spaces, including for those engaging in or thinking of choosing more active travel modes like walking and cycling, for children playing and for those engaging with the night time economy (see draft London Plan policy D7, GG1, S4, SD6, SD8, HG6 and T2 as well as the Transport and Town Centres chapters of our local plan). There are also particular safety implications for mixed used schemes which collocate residential with employment uses which could be the sources of hazards to residents (Draft London Plan Policy E7).
- 4.5.5 Since the withdrawal of the Code for Sustainable Homes and the integration of only a part of this into Building Regulations, there is an additional onus on local authorities to ensure high standards of sustainability as part of the design approach to development. This involves exploring the possibilities of new standards (such as Home Quality Mark One) and setting out clear requirements for sustainable design and standards on design quality, space requirements and densities. Design has a substantial and long-term impact on the sustainability of the built environment and is therefore crucial to get right from the start.
- 4.5.6 Servicing, management and maintenance plans and arrangements are further critical tools to ensure that design features for the safety, accessibility and sustainability of a building or public space are properly serviced, managed and maintained over the lifetime of a development and taken into account from the start of the design process. They can also help to prevent and combat issues of antisocial behaviour or crime where necessary



D4 Draft policy approach: Designing for a sustainable, safe and inclusive borough

The Council will seek to achieve appropriate design policies and standards in all development proposals, in terms of sustainability, safety and accessibility, in line with the London Plan, Lifetime Homes principles and the Mayor’s relevant SPGs.

We will achieve this by:

- a) Promoting sustainable design and resilience to climate change environmental hazards and emergencies, in overall design as well as in detail, through all new development. Use of the BRE Home Quality Mark is encouraged as a tool-kit for demonstrating how schemes meet the sustainability element of this policy; and
- b) Ensure that all developments are designed for the long-term, are flexible and adaptable for different uses over their lifetime; or designed for easy deconstruction and reconstruction or relocation, in line with the circular economy principles.

We will expect development proposals to:

- c) Maximise possibilities for the reuse of materials and minimise waste generated during the construction of development; and
- d) Make appropriate arrangements and/or plans for servicing, management and maintenance of buildings and spaces which are taken into account as part of the design and planning process from the start.



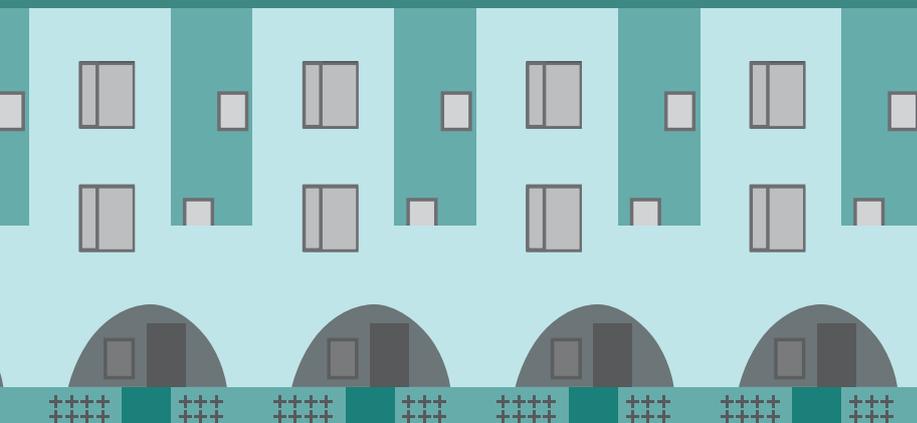
Figure 4.4: LILAC Low Impact Affordable Community co-housing using low energy, super insulated straw bale and timber construction by ModCell, West Leeds

What are the ‘Circular Economy Principles’?

An economic model in which resources are kept in use at the highest level possible for as long as possible in order to maximise value and reduce waste, moving away from the traditional linear economic model of ‘make, use, dispose’.

5 Meeting Enfield's housing needs

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Brownfield land should be prioritised, but a Green Belt Review to establish whether land could be used to make a positive contribution to sustainable growth in a planned way is needed

Taller buildings to live

The Lee Valley corridor was supported for housing growth

Town centres, the A10 corridor and the Council's estates as places to live were also supported

What respondents supported about housing growth as part of the 2015 Consultation and Enfield Conversation

Although town centres and areas around stations were supported for housing growth, Silver Street, Grange Park, Winchmore Hill, Bush Hill and Arnos Grove were slightly less popular places with under one in five choosing them for building new homes

The use of empty premises above shops in town centres for new homes

The necessary infrastructure such as public transport is required

Building additional storeys above single storey shopping parades for new homes



5 Meeting Enfield's housing needs

5.1 Introduction

- 5.1.1 Increasing housing availability, affordability and quality is a key priority challenge for this new Local Plan. Home ownership has fallen whilst private renting has increased as more of our residents find it difficult to buy their own home and the cost of living continues to rise. Development levels, especially of affordable units, have not kept pace with demand, limiting housing supply and affordability. Approximately 53% of residents receiving housing benefit are currently dependent on the private rented sector to meet their housing needs. Additionally, not all past development that has been delivered has been of sufficient quality. Therefore, addressing both overall supply and particularly quality and affordability is fundamental to the sustainable growth agenda in Enfield.
- 5.1.2 Through this growth strategy, the new Local Plan will seek to deliver a range of housing types that are able to meet the needs of all residents at all stages of their lives. This will include high quality housing for private sale, a range of affordable housing products, purpose-built rented accommodation (build-to-rent) and specialist housing, as well as provisions for self-builders, and gypsy and traveller accommodation, all developed as part of mixed and balanced communities.
- 5.1.3 Crucially, all new development across the borough needs to support the health (physical and mental health) and well-being of all residents; environmental, social and economic sustainability; inclusive high-quality design with appropriate space standards and flexible internal layouts; as well as adequate and equal access to local services, jobs, infrastructure and public transport.

5.2 Housing growth and quality

- 5.2.1 The draft new London Plan (2017) proposes a London-wide target of 66,000 new homes for London for at least twenty years. It sets a target for Enfield of 18,760 between 2019 to 2029, equating to 1,876 dwellings per annum. This requires a complete step change from previous delivery rates, which in the past 10 years have seen 633 gross and 512 net average completions per year (based on gross completions, which are the total of units built and net completions subtract units demolished and not replaced as part of any scheme), a third of our new targets.
- 5.2.2 The Council will create successful neighbourhoods by providing homes that people want to live in and create places where people aspire to stay. Appropriate housing is essential to quality of life and the Council's aim is to give all residents the opportunity of living in a high-quality home which they are able to afford.



Figure 5.1: Electric Quarter as built in Ponders End



Figure 5.2: Dujardin Mews

5.2.3 Meeting identified local need and the Mayor’s housing supply targets will be a significant challenge and requires a completely new approach to growth and a much more proactive attitude to change in the borough. Enfield’s actual housing delivery over the last ten years of monitoring is shown in Table 5.1.

5.2.4 The new Local Plan also aims to accommodate unprecedented levels of housing growth in the borough, supported by appropriate infrastructure, jobs and services, to meet London’s housing challenge and the needs of Enfield’s residents. Without this, inequality in the borough in terms of housing availability, affordability and quality as well as in terms of environmental quality, access to jobs and services will increase. The Council wants to ensure that growth delivers appropriate development for all residents, in all parts of the borough, not just for a shrinking, wealthy minority or for the benefit of developers.

Year	Total additional homes (gross)	Total affordable homes (gross)	Total additional homes (net)
2016/17	1,003	302	884
2015/16	793	122	674
2014/15	454	85	399
2013/14	712	307	512
2012/13	592	243	550
2011/12	365	79	297
2010/11	628	239	455
2009/10	398	46	277
2008/09	432	73	333
2007/08	1,082	429	935

Table 5.1: Enfield’s Housing Delivery showing housing delivery over past 10 years of monitoring (source: Enfield’s Housing Trajectory)



Figure 5.3: Burleigh Way



Figure 5.4: Highmead Silverpoint building



H1 Draft policy approach: Housing growth and quality

The Council will secure the conditions to bring forward a sufficient supply of homes to meet the identified needs of existing and future households by seeking to deliver at least 1,876 homes per year in the plan period between 2018-2036.

We will seek to increase this growth where new infrastructure investment creates opportunities to do so sustainably, for example if Crossrail2 comes forward.

We will achieve this by:

- a) Exploring the possibility for development in all places with capacity to accommodate new homes whilst respecting local distinctiveness and protecting and enhancing the borough's physical, natural and historic environment; and
- b) Prioritising delivery of new homes around the emerging growth and investment areas identified in Chapter 2 of this Plan.

We will expect development proposals to:

- c) Make the most efficient possible use of land by promoting higher density development in suitable, accessible locations, taking into account local character and existing and planned infrastructure capacity;
- d) Ensure that development addresses the need for a variety of different types of homes in the borough and contributes to the creation and maintenance of sustainable communities;
- e) Support the regeneration of existing housing estates, ensuring the net supply of affordable and family units is maintained or increased, and that homes and associated community and open space are brought up to a high quality standard;

- f) Work to return vacant homes to use and ensure that new homes are occupied.

The Council will resist development, which would result in a net loss of homes or residential floorspace and especially the loss of affordable units.

The requirement to provide housing to meet the objectively assessed needs of our residents is consistent with the Council's statutory planning obligations as prescribed by the NPPF (2018) and London Plan.

For the next version of the new Local Plan we will finalise our housing capacity studies, including an up-to-date Local Housing Needs Assessment and Local Plan Viability Assessment, and will publish our final housing figures with an aim to meet or exceed our housing target as set out in the new London Plan of 1,879 new dwellings per annum.

5.3 Affordable housing

5.3.1 There is a significant London-wide and local need for genuinely affordable housing. The average Enfield house price is over eight times that of the average salary. Average house prices have increased by 65% over the period between 2010 and 2016, creating a climate where smaller, privately rented properties are often the only feasible option for residents faced with high costs and a shortage of affordable properties. Yet private rents are equally high and rising, with average rents in 2015 at £1,270. This means that if renting from the private sector, average households spend over 38% of their gross income on rent, and a much higher percentage of their net disposable income. As a result, Enfield has one of the highest percentages of adults claiming housing benefit in London, well above the national and the London average.

Year	Approvals	Completions
2017/18	96	48
2016/17	101	240
2015/16	11	35
2014/15	280	10
2013/14	13	0
TOTAL	501	333

Table 5.2: Office to Residential Conversions in Enfield under new Permitted Development Rights (Source: London Development Database)

Year	Number of new dwellings on brownfield land	Total number of new dwellings (new and converted)	Percentage of new dwellings on brownfield land
2015/16	793	793	100%
2014/15	883	886	99.7%
2013/14	1,419	1,428	99.4%
2012/13	668	668	100%
2011/12	356	363	98%

Table 5.3: Housing Delivery on Enfield Brownfield Land (Source: Enfield's Annual Monitoring Report)

Affordable housing delivery in Enfield	2013/14	2014/15	2015/16	2016/17
Social and affordable rent	40%	59%	39%	18%
Intermediate	60%	41%	61%	13%
Affordable housing as a percentage of housing delivery	60%	29.4%	20.4%	30.1%

Table 5.4: Housing Delivery on Enfield Brownfield Land (Source: Enfield's Annual Monitoring Report 2015/16)

Affordable housing, is defined as Social Rented, Affordable Rented and Intermediate Housing, provided to eligible households (determined with regards to local incomes and local house prices) whose needs are not met by the market. Affordable housing is usually funded through planning obligations on private developments or through Mayoral grant and other Council or housing association funds.

5.3.2 Affordable housing delivery in the borough has been challenged in recent years by the introduction of a number of changes in national planning policy and guidance. These have included:

- Designating conversions of office to residential development as permitted development, for which no affordable housing contributions can be sought by councils;
- Raising the affordable housing threshold to ten or more dwellings, under which affordable housing obligations should not be sought by councils, to encourage building on small sites;
- The introduction of Vacant Building Credit, to encourage delivery of housing on brownfield land, which means that where a vacant building is brought back into any lawful use, or is demolished to be replaced by a new building, the developer should be offered a financial credit equivalent to the existing gross floorspace of relevant vacant buildings when the local planning authority calculates any affordable housing contribution;
- The introduction of viability testing through the NPPF, which means that developers do not have to provide full affordable housing contributions if they can show that this would mean that the development is no longer commercially viable enough for them to undertake;
- Approximately 720 of all new homes delivered in Enfield over the last five years have been on small sites providing less than ten dwellings. Housing delivery on brownfield land has been consistently at or close to 100%. Office to residential conversions have also been a significant element of recent development with 440 units approved and 285 units delivered in the five-year period between 2013/14-2017/18. And the field of scheme specific viability assessment has become increasingly complex to an extent that it is often difficult for councils to defend the need for affordable housing provisions as part of private developments.

5.3.3 All of these factors add up to a significant loss of delivery of much needed affordable homes through the planning system in the past years.

5.3.4 Most affordable housing products and social rent in particular require significant subsidy. Partially due to the decrease in public sector funding and partially because of the above mentioned issues with securing affordable housing from private development.

5.3.5 Overall numbers of affordable housing delivered have fallen, both in total numbers and as a percentage of overall delivery. This has happened, despite a significant increase in house prices and residential land values during the same period (source research by RAU et al). This suggests that the current system of affordable housing provision has fallen significantly short of delivering on the continuing need.

5.3.6 The need for affordable and especially for social housing remains high in the borough, which is evidenced in the draft Enfield Strategic Housing Market Assessment (SHMA) (2015). This recommends that as much as 70% of all affordable housing should be social and affordable rented products in order to meet with demand. As part of the evidence base to inform the new Local Plan, the Council will be preparing a new local housing need assessment, in line with the NPPF and requirements set out in NPPG, as well as Local Plan Viability Assessment, to strike a balance between meeting demand while ensuring that cumulative local plan requirements do not threaten development viability.

5.3.7 Since the introduction of the NPPF, the majority of applications for residential development proposals have been subject to a scheme specific viability assessment, limiting the amount of affordable housing contributions which could be sought on most developments. Additional limitations have been introduced through other government policy on affordable housing (see above).

5.3.8 The Mayor, in his draft London Plan and in the Mayor's Affordable Housing and Viability Supplementary Planning Guidance (SPG) has introduced a draft policy approach that sets a 50% affordable housing delivery target for long term delivery. However, he suggests ordinarily granting planning permission without the need for a viability assessment if 35% affordable housing can be delivered without grant sets and a 50% site specific target on publicly owned land and industrial sites. The Mayor is clear that where a local planning authority currently adopts an evidenced approach which will deliver a higher average percentage of affordable housing without public subsidy, the local approach can continue to apply. The Mayor's approach also recommends early and late review mechanisms to capture the maximum value towards the delivery of affordable housing, as well as publication of assessments to ensure transparency. The Council hopes that these measures will substantially improve the amount of affordable housing that can be secured through planning.

5.3.9 The NPPF and London Plan seek affordable homes to be provided on-site, as part of wider housing developments. This encourages the building and maintaining of mixed and balanced communities. Depending on the outcomes of the Local Plan Viability Assessment, the Council will set an affordable housing target and will seek to optimise the delivery of affordable housing supply in the borough in line with the London Plan, to meet as much as possible of up to date evidenced local need. This approach aligns with the aims of the Council's Corporate Plan to create thriving, affordable neighbourhoods and increase the supply of affordable housing.

5.3.10 Without appropriate affordable housing contributions and provisions from the majority of sites, meeting our targets and evidenced need for affordable housing will be highly challenging. Therefore, in line with the Mayor's Affordable Housing and Viability SPG and draft London Plan, as brownfield sites already account for 100% of development sites and considering that our affordable housing requirements are already subject to viability testing and thus not preventing sites from coming forward, the Council is of the view that it will not be appropriate to apply the vacant building credit.

5.3.11 It is also the Council's view in line with the Mayor's policy and guidance, that an affordable housing requirement on sites providing fewer than ten homes can be justified where evidence can demonstrate the role that these sites play in supporting affordable housing delivery in the borough, and that sites would remain viable. This will be further confirmed through the Local Plan Viability Assessment and Enfield's local housing need assessment.

Affordable rent

5.3.12 Affordable rent is a relatively new affordable housing product, introduced by national government regulations in 2011 with the intention of directing more funds towards the building of new affordable homes without government grant. The government's regulations state that these higher "affordable rents", at up to 80% market rent, are to be charged for newly-built homes and some existing homes that are being re-let. There is no fixed level of "affordable rent". Affordable rent can vary depending on the housing provider and the local average rent levels.

5.3.13 The Council will soon be consulting on a new Housing Strategy for Enfield. Matters such as setting appropriate rent levels for the affordable housing stock managed and allocated by the Council, in line with nationally set formulae, are dealt with by the Housing rather than the Planning service.



H2 Draft policy approach: Affordable housing

The Council will seek the maximum deliverable amount of affordable housing on development sites and from all other sources of supply. We have set a strategic target that 50% additional housing delivered across the borough between 2018-2036 will be affordable, having regard to the evidence of the emerging local housing need assessment, as well as the Local Plan Viability Assessment and factors such as the availability of any applicable public subsidies, the site context and character of the surrounding area and design related issues.

In line with the draft London Plan, the Council will not require viability assessments on schemes which provide a minimum of 35% affordable housing on site without grant.

The Council will not apply the Vacant Building Credit.

We will achieve our strategic affordable housing target by:

- a) Supporting a mix of housing sizes and a variety of housing products in market housing and affordable tenures, to meet identified need; and
- b) Securing affordable homes from a range of Council-led initiatives.
- c) On sites capable of delivering ten dwellings or more or which have a combined floorspace of 1,000 sqm or more, we will expect development proposals to:
 - Use grant funding to maximise the delivery of affordable housing;
 - Achieve at least 30% of affordable housing delivery to be social rent and London affordable rent; 30% intermediate affordable housing product including London Living Rent and Shared Ownership and the remaining 40% to be determined by the Council in line with updated identified need;

- All affordable housing to be delivered on site; and
- Set these commitments down in Section 106 agreements.

The Council will resist development proposals resulting in a net loss of affordable housing provision.

The Council could increase the proportion of affordable housing to be required through policy to above 50%. This approach would ensure that more Affordable Housing was provided as part of new developments coming forward and in turn contribute to the overall need. However, the target could only realistically be increased if evidence suggests that it is both necessary and viable. The other possible alternative of lowering the proportion of affordable housing through local policy may allow some sites previously considered as 'unviable' to be brought forward by developers. However, on the basis of evidence of housing need and the fact that the new London Plan will be setting higher housing targets, this option is unlikely to be acceptable on the basis that it would not address objectively assessed needs and may encourage proposal designs which do not maximise overall and affordable housing potential.

5.4 Small sites

- 5.4.1 The Mayor of London wants small sites capable of delivering between one and 25 homes or less than 0.25ha in size to play a far greater role in meeting housing demand than previously.
- 5.4.2 The draft new London Plan is proposing a new annual housing target for small sites which forms a substantial portion of the overall housing target for the borough. The proposed small sites target for Enfield is to deliver 983 new homes per year. This forms just over half of the borough's annual housing target representing a significant challenge for Enfield particularly, given that previous housing delivery has largely been dependent on larger schemes.
- 5.4.3 The small sites target proposed by the draft new London Plan is being interrogated by the Council's own evidence base work and related design guidance to help determine the realistic level of small sites delivery that can be achieved through this new Local Plan. This will also consider the viability of different types of small sites development in Enfield. However, small sites alone we will not deliver a significant portion of the housing needed for Enfield.



H3 Draft policy approach: Small sites

The Council will encourage development on small sites for infill development on vacant or underused sites and for the redevelopment or upward extension of flats and non-residential buildings, to provide additional housing and particularly affordable housing.

Applications are required to be in compliance with all other relevant Local Plan policies.

We will achieve this by encouraging housing delivery and intensification on small sites with good public transport accessibility (PTAL 3-6) and on sites within 800m of a Tube, rail station or Major or District town centre boundary;

In line with draft Policy Approach H2 on Affordable Housing, affordable housing contributions will be sought from all schemes resulting in a net gain of one or more units, in line with need and viability as established in updated evidence.

Figure 5.7: Example of infill development in Islington



Figure 5.8: Ordnance Road



5.5 Housing mix

- 5.5.1 Providing a range of different dwelling types and sizes supports the creation of mixed, balanced and sustainable communities and will help to meet the evolving housing needs of our increasingly diverse population. This approach is aligned to the aims of the Council’s Corporate Plan to ensure thriving, affordable neighbourhoods.
- 5.5.2 Enfield’s draft SHMA (2015) identifies a specific need in the borough for 50% of affordable rented and market housing respectively to be homes with at least three bedrooms suitable for families. This figure is supported further by Enfield’s Local Housing Register which indicates a demand of 47.3% for family sized homes for affordable and social rented housing.
- 5.5.3 The need identified in the draft SHMA for intermediate housing sizes is different. It identifies a lower demand for family sized homes of just 15%. This may be an indication that intermediate housing is favoured in the borough by younger people with fewer, or no children, taking their first step onto the property ladder.
- 5.5.4 Family units have historically been considered to consist of three or more bedrooms. However, in line with the draft London Plan, as many families now live in two-bedroom units, two-bedroom units should also be acknowledged as helping to cater for the needs of families.
- 5.5.5 Developments will be expected to deliver a mix of homes which takes into account identified local need as well as individual location, site and development characteristics. The Council encourages early engagement from developers to discuss how appropriate housing mix and family housing need can be addressed and to discuss relevant design requirements.
- 5.5.6 Any design guidance specific to family housing is applied to all two or more-bedroom units. All self-contained homes will be required to meet the London Plan and national housing space standards. This will ensure that new homes will have adequately sized rooms and efficient dwelling and room layouts which are functional and fit for purpose. Requirements for a proportion of accessible and adaptable dwellings will ensure that homes are flexible enough for a range of changing needs throughout residents’ lifetimes, in accordance with the London Plan and Building Regulations. Wheelchair units should be marketed as suitable for wheelchair users and should be provided across all tenures.





H4 Draft policy approach: Housing mix

The Council seeks to ensure that a choice of homes is available in the borough that will address the borough's needs for homes of different sizes and tenures as identified through Enfield's most up to date Strategic Housing Market Assessment (2015), emerging local housing need assessment, Housing Register.

For Affordable Housing

- a) We will achieve this by establishing a borough-wide strategic target, based on up to date local needs evidence, of 40-50% two or more bedroom dwellings.
- b) We will expect development proposals to seek to deliver a higher proportion of family homes.

For Market housing and for London Affordable Rent

We will expect residential-led development proposals to:

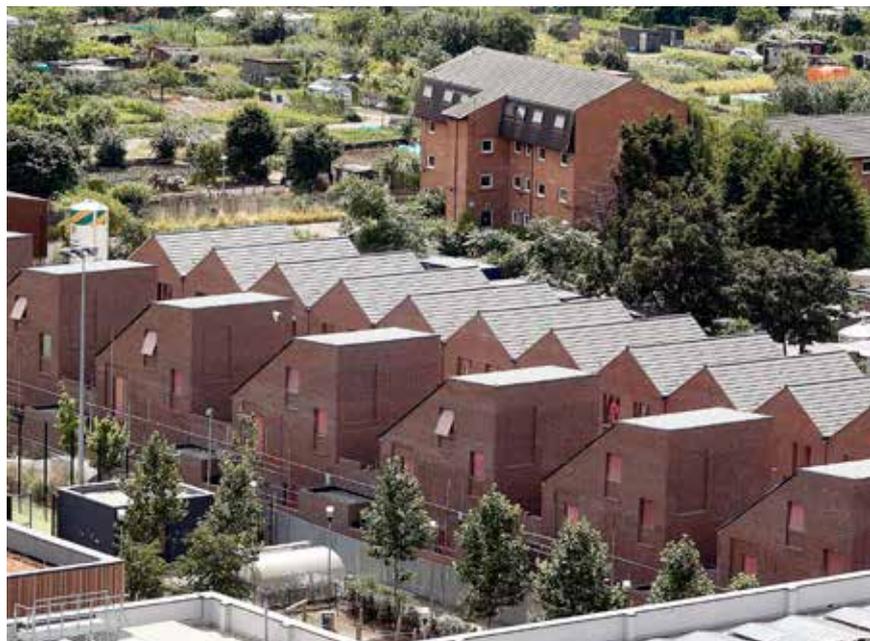
- c) Deliver homes in a mix of sizes informed by the development site characteristics, identified local housing need assessment, and the need to deliver mixed and balanced communities;
- d) Be appropriately and flexibly designed to respond to residents' changing needs over time;
- e) Be designed to be appropriate for the accommodation of families; and
- f) Deliver 90% of units as Building Regulation M4(2) 'accessible and adaptable dwellings' and 10% of new housing as Building Regulation M4(3) 'wheelchair user dwellings' across all tenures.

Net loss of family sized units of two or more bedrooms will be resisted.

All self-contained housing will be required to meet the London Plan and national housing space standards.

The Council is discouraged from setting overall targets for dwelling size mix as part of the Local Plan by the London Plan. However, delivery of homes to meet local need in line with evidence is part of the council's statutory duty. It is the Council's priority to ensure that these homes have the suitable dwelling size mix to address identified demand.

Figure 5.10: Alma Estate as built, Ponders End



5.6 Private-rented sector and build-to-rent

- 5.6.1 London’s private rented sector (PRS) has grown significantly over recent years while home ownership levels have declined. A decade ago private renting was 17 per cent of London’s housing stock. Today, the PRS accounts for approximately 25% of London’s housing market. In Enfield, 21-22% of residents rent from a private landlord. This is above the national but below the London wide average. The sector helps to meet demand for short- and long-term housing as well as providing accommodation for households unable to afford to buy their own home or access affordable rented housing.
- Delivers a better quality of rental product that is professionally managed;
 - Provides longer term tenancies beyond three years for households; and
 - Provides certainty about the rent for the length of the tenancy including the basis of any increases.
- 5.6.2 However, the sector is not very highly regulated and often fails to deliver the levels of quality and security which residents seek. Private rented homes have historically often been poorly managed with properties suffering from overcrowding, hazards, poor facilities and insecure tenancies. Furthermore, PRS rents are high and rising, with an increase of average Enfield PRS rents of 32% in the last five years.
- 5.6.3 Build to Rent (BtR) housing is a new type of delivery model which provides high quality, purpose-built homes with professional management and longer tenancies for those who want them. It has the potential to house residents across a range of income levels, ages and household types. While this type of housing is well suited to mobile professionals, it can also provide homes for essential workers who deliver the borough’s key services, for families and for older or vulnerable people. When delivered in line with draft London Plan policy H13, Build to Rent housing can offer a range of benefits, making it a more attractive product than traditional PRS housing to both developers, tenants councils and stakeholders, as it:
- Increases the overall supply and accelerates the construction of new homes;
 - Offers longer term investment vehicles and associated gains;
 - Supports greater choice for tenants in the rental market;
- 5.6.4 The BtR sector is in its infancy but is rapidly evolving. There are several different business models already present in the market and more are likely to appear in the future. Currently, there are a variety of organisations that are active in London’s BtR market. These include institutional investors such as private pension providers and others; private developers ranging from bespoke build to rent developers and operators (i.e. those who build and manage the homes) to mixed-use developers and ‘traditional’ house-builders; local authorities, including general fund investment, council-owned development companies and joint-venture arrangements with the private sector; and housing associations.
- 5.6.5 The Council supports BtR and will positively promote this housing product through policy making, to support the delivery of the high quality, secure homes that Enfield residents need, in accordance with the London Plan and the Mayor’s SPG on Affordable Housing and Viability. Throughout this plan period we anticipate that BtR will become an important component in delivering a choice of housing including affordable housing, ensuring timely delivery, supporting placemaking and in improving private rented sector standards in the borough.
- 5.6.6 The Mayor specifically allows boroughs to set their own Build to Rent thresholds to reflect local housing market circumstances and affordable housing need. However, it is important that where a lower threshold is set, Build to Rent schemes must still operate according to the stipulations in this guidance in order to qualify for the application of the Built to Rent policy.



H5 Draft policy approach: Private rented sector and build- to-rent

In line with the draft policy approach H1, the Council will seek to maximise the supply of housing in the borough.

We will achieve this by supporting proposals for standalone build to rent developments or build to rent blocks on large mixed tenure development, in appropriate locations.

Schemes will be required to:

- Meet identified local and strategic housing needs;
- Provide at least 50 units or a level reflecting local circumstances determined through up to date evidence at a later Local Plan stage within the development, block or phase;
- Offer tenancies of at least three years;
- Provide an amount of affordable housing in perpetuity and in line with appropriate London Plan and Local Plan Policies on affordable housing;
- Provide homes held for at least 15 years under covenant;
- Provide a claw-back mechanism in order to recoup additional affordable housing contributions in the event of the covenant being broken;
- Provide a review mechanism in the event that policy compliant levels of affordable housing cannot viably be provided;
- Incorporate high standards of design and provide a management plan, committing to high standards of ongoing management of the premises.

The Council could seek to meet more of its identified need for rental properties through local authority and housing association delivery; however, delivery of affordable housing has been severely constrained in recent years due to viability, delivery capabilities, grant and other government changes.

Different options for Build to Rent delivery to meet need in the Borough will be investigated in the Local Plan Viability Assessment and associated evidence as the Plan progresses.

Figure 5.11: Example build-to-rent scheme (photo credit: TfL)



5.7 Custom and self-build housing

- 5.7.1 Custom and Self-Build houses are a Government initiative which aims to be an ‘affordable’ means to building and owning a high quality sustainable home. The government’s immediate objective is to realise the potential of the custom homes market and double its size over the next decade, creating up to 100,000 additional custom build homes.
- 5.7.2 The government wants Local Authorities to include provisions for self-build and custom-build projects to encourage them to contribute towards local housing provision. The Council aims to support this initiative to give interested local residents the opportunity to design and build their own home. The Council believes that the right to build initiative offers an opportunity to not only increase the number of homes in the borough but also deliver exemplar homes of high quality sustainable design.
- 5.7.3 As of 2016 the Council has published a register for people to express an interest in acquiring self-build or custom build plots in their area where they become available. This register will help inform the Council of the level of demand for self-build and custom build plots in Enfield. It will also enable the Council to develop its housing and planning policies, and plan accordingly for self-build or custom housing plots.



H6 Draft policy approach: Custom and self-build housing

The Council will support proposals for Self and Custom Build projects, where such homes will be occupied by people or groups on the Council’s Self and Custom Build register and comply with all applicable legislation and policies within this Local Plan.

This is a new area of policy and national government has passed legislation to promote the self-build sector, so it is felt that a local position should be established.

Figure 5.12: Example of self-build along the River Lee



Figure 5.13: Ladderswood under construction



5.8 Supported and specialist housing

- 5.8.1 There is an increasing need for specialist housing for older, disabled or vulnerable people. Around 3% of Enfield's current population is over 65 and 18% of the working age population have a disability. By 2029, the number of older person households (aged 65 and over) in London will have increased by 37 per cent on average. Households aged 75 and over, who are most likely to move into specialist older persons housing increasing by 42 per cent. Older people in the borough generally tend to remain in their family home after children have moved out or after the loss of a partner. This has been leading to a growing trend of under-occupation of family sized homes. A shortage of suitable down-sizer accommodation is often a factor in this.
- 5.8.2 Enfield's draft SHMA (2015) identifies that there will be an increase in Enfield's aged over 75 with 3,200 additional people in the period between 2017 to 2022, equating to 640 additional persons per annum. The draft new London Plan contains an annual borough benchmark for specialist older persons housing of 195 for Enfield. Supported and specialist accommodation need can also come from vulnerable adults and young people including those with a disability, those with a recent history of violence, domestic abuse, mental health issues or rough sleeping (see draft London Plan Policy H14 and H15 for more detail).
- 5.8.3 The majority of over 65s and many disabled and vulnerable people will continue to live in mainstream housing and not all will require specialist housing. However, many may require changes to their accommodation at some point in their life, depending on changing levels of need for care, support and safeguarding. Some of this need can be addressed through adaptation of existing mainstream housing stock, through existing specialist accommodation, through access to support services (through the NHS or adults social care) and through delivery of a proportion of 'accessible and adaptable dwellings' and 'wheelchair user dwellings'.
- 5.8.4 A remaining percentage of need, to be identified as part of the updated local plan evidence base, will however, be more appropriately addressed through the delivery of new specialist housing. As demand for these products grow, opportunities will increase to more comprehensively meet this need. Different options delivering different levels of care and support can include:
- Self-contained sheltered /supported accommodation;
 - Self-contained extra care accommodation; and
 - Non-self-contained residential nursing care accommodation.



Figure 5.14: Retirement home, as seen in Albino Bergamo

- 5.8.5 In line with the draft London Plan, sheltered accommodation and extra care accommodation is considered as being in Use Class C3 (dwelling houses). Residential nursing care accommodation (including end of life/ hospice care and dementia care home accommodation) is considered as being in Use Class C2 (residential institutions). Only C3 accommodation, i.e. homes that fall under the category of dwelling houses, is included in the borough's objectively assessed housing need. For more detailed definitions see the draft London Plan.
- 5.8.6 Although a high proportion of people in the borough may have their own resources to meet their accommodation and care needs, some Enfield residents may need financial support to enable them to access housing support services or appropriate accommodation.
- 5.8.7 Providing different types of specialist and supported housing to meet identified local demand, especially in new higher density developments, will require careful planning, design and an appropriate location to ensure residents' needs are accounted for and integrated into the new development. As mentioned previously, the Council will be preparing a new local housing need assessment. This will be aligned with the NPPF and requirements set out in emerging guidance, which will include a specialist housing target based on the Housing Learning and Improvement Network (Housing LIN) methodology and will also aim to establish the local need for affordable specialist accommodation.
- 5.8.8 The Council will support proposals that enable older, disabled and vulnerable people to live independently in mainstream housing for as long as they want, as well as the delivery of appropriate tailored specialist C2 and C3 accommodation, to enable residents to move when they wish to or when they require greater support to remain safe and independent.



Figure 5.15: Specialist accommodation in Harderwijk, The Netherlands



H7 Draft policy approach: Supported and specialist housing

The Council will support the provision of appropriate housing to meet the specialist and supported needs of vulnerable local people, including specialist housing for elderly people.

We will achieve this by:

- a) Supporting development that allows people to live as independently as possible whilst meeting the identified local needs within the borough and being targeted at Enfield residents; and
- b) Providing options at a range of costs to suit resident's different financial circumstances in line with evidenced local need, including a proportion of affordable specialist units on site or a contribution towards addressing the identified need for affordable specialist housing elsewhere in the borough; and
- c) Sheltered and extra care accommodation is classed as Use Class C3 and therefore affordable housing and all other relevant Local Plan policies will be applied as for all mainstream housing.

We will expect development proposals to:

- d) Contribute to creating a mixed, balanced, inclusive and sustainable neighbourhood;
- e) Be well integrated with the wider neighbourhood and protect the amenity of neighbouring occupiers in line with the Agent of Change principle;
- f) Be delivered through partnership arrangements between the developer and an appropriate support service provider;
- g) Be suitable for the intended occupiers in terms of the standards of facilities, design of buildings, density, parking; internal space and amenity space;
- h) Provide the necessary level of supervision, management, care and support;
- i) Have arrangements in place for appropriate long-term management; and
- j) Offer easy access to community facilities, is accessible to public transport, workplaces, shops and services appropriate to the needs of the intended occupiers.

The Council will resist the loss of specialist accommodation, unless:

- Adequate replacement accommodation can be provided; or
- It can be demonstrated that there is a surplus of specialist accommodation in the area; or
- It can be demonstrated that the existing care home is incapable of meeting relevant industry standards for suitable accommodation in a cost-effective manner.



5.9 Gypsy and traveller accommodation

- 5.9.1 The government provides guidance in ‘Planning Policy for Traveller Sites’ (2015) on how to plan for appropriate Gypsies and Travellers accommodation. The Council recognises the importance of providing the appropriate type of housing to meet the needs of Gypsies and Travellers and the significant benefit it can bring to this community. The new guidance includes a change to the definition of Travellers for planning purposes.
- 5.9.2 In order to identify the level of need in the borough and to respond to the new national guidance and a change to the definition of a Traveller, the Council will undertake a Gypsy and Travellers Accommodation Needs Assessment as part of the Council’s local housing need assessment, to ensure we are planning appropriately for this community.



H8 Draft policy approach: Gypsy and traveller accommodation

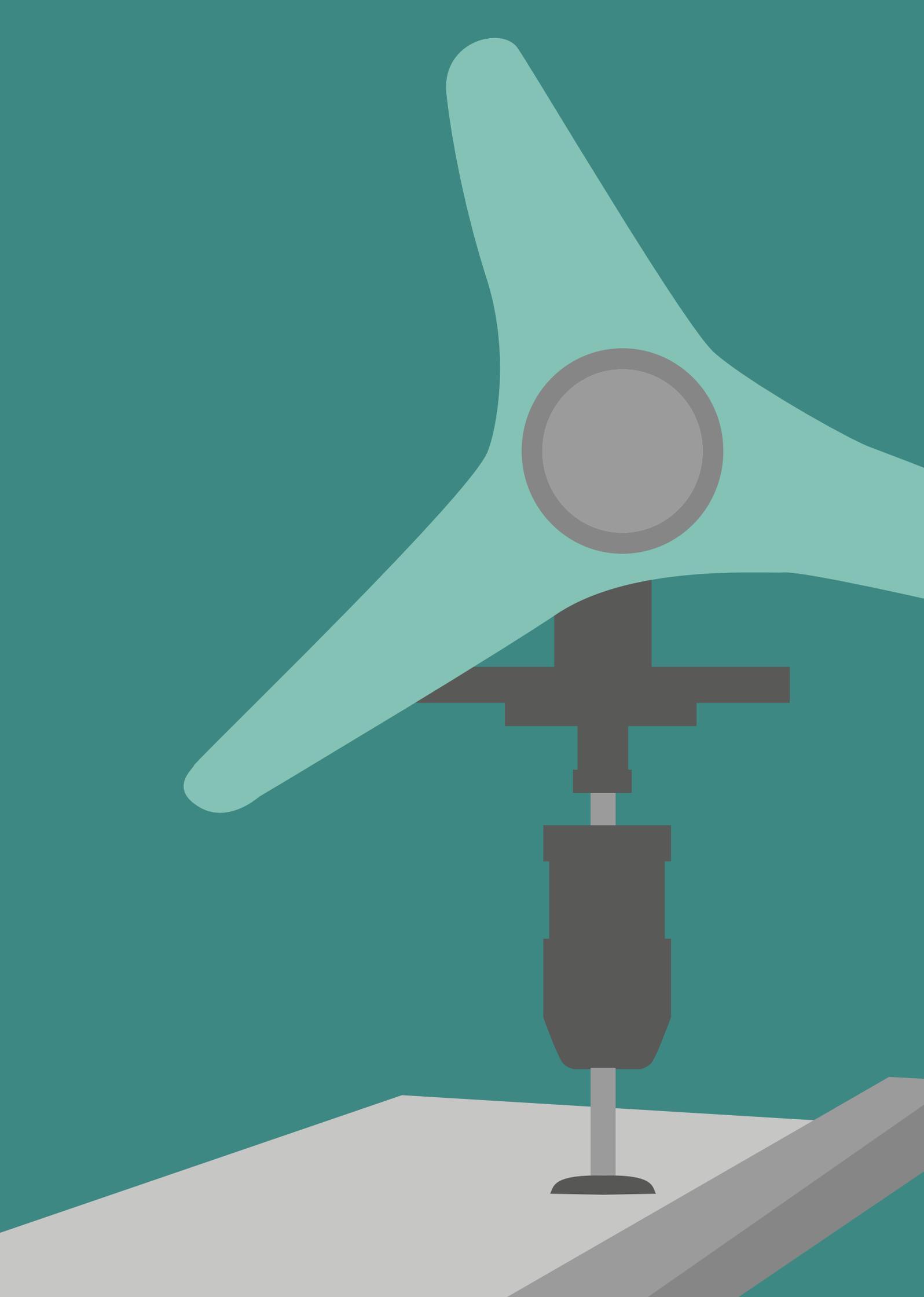
The Council will give careful consideration to the needs of gypsies and travellers.

We will achieve this by:

- a) Supporting appropriate accommodation where it meets an identified need as evidenced in the Council’s up-to-date housing need assessment and ensure requirements are planned for accordingly.
- b) Ensuring development fully satisfies the criteria in this draft policy; and
- c) Working in partnership with the Council’s Housing Department;

Development of any additional temporary or permanent Gypsy and Traveller accommodation will be supported where:

- The site is suitable for residential development and has good access to services and facilities to meet the needs of residents;
- Development does not have a detrimental impact on the natural environment;
- Development does not have a detrimental impact on the amenity of neighbouring and nearby residents and businesses; and
- The site is located in Flood Zone 1 or exceptionally in Flood Zone 2, and is otherwise suitable for development.



6 Promoting a competitive economy

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The continued protection of the **SIL, LSIS** and areas of non-designated employment land is supported, but opportunities provide further industrial capacity through **intensification** of existing industrial sites need to be considered

Younger people want more **job opportunities locally** rather than having to commute into central London

Greater protection of employment-related uses and activities is supported

Improvements to **roads and public transport** would provide greater opportunities to access local employment opportunities

What respondents said about economic growth as part of the 2015 Consultation and Enfield Conversation

Improvements to **all methods of communications including digital infrastructure** would support local businesses

Affordable workspace for a range of small businesses and creative industries is supported

Growth is supported, but the **loss of industrial land, employment floorspace and jobs** would not be acceptable

The **creation of jobs closer to home** so Enfield residents can live and work in the borough is supported



6 A strong and competitive economy

6.1 Business and job growth

- 6.1.1 Providing the best opportunities for local employment to our residents is a priority for the new Local Plan. In order to achieve this and promote sustainable and quality employment the policy approach in this section of the Plan will need to attract and retain investment from existing and emerging growth sectors such as culture, creative and evening economy, education and knowledge-led economy, hi-tech manufacturing, warehousing and logistics, construction and green enterprise, business and business services – building on Enfield’s platform for economic growth.
- 6.1.2 Enfield is ideally positioned between central London and the London-Stansted-Cambridge Innovation Corridor, so we should be taking every opportunity to grow, innovate and diversify the economic base, whilst at the same time provide for associated land, premises and infrastructure requirements including digital, energy, public transport, road network, workspaces, and community facilities.
- 6.1.3 Ensuring that the supply of suitable employment land and premises is appropriately protected and newly provided for to meet emerging growth sectors will be a key component in maximising Enfield’s economic strength and future investment. Policies in the new Local Plan will need to recognise that in the competition for land, this needs to be evidence-led and related to growth needs, and to work to achieve efficient use of land, without undermining its function. As part of the evidence base, the Council is looking into the type of knowledge economy and technology businesses to proactively target.
- 6.1.4 The new Local Plan will look to support a broad range of employment opportunities by seeking to create high quality business environments that are supported by appropriate infrastructure including digital, energy and social infrastructure and facilities, and delivered which meet the needs and requirements of existing and future businesses and its users.
- 6.1.5 Consequently, the promotion of flexible workspaces allows us to respond to changing business needs and create robust, future-proofed places, including successful town centres and the promotion of local supply chain and local employment hubs, which suit the particular need for Enfield where the majority of businesses are micro, small and medium enterprises, as well as the large ones.
- 6.1.6 Different types of employment are more appropriate in particular areas such as the evening economy/night time uses and cultural facilities within our town centres and industrial uses and warehouses within transport corridors. This builds on locational advantages related to clustering, compatibility with the wider area and the provision of appropriate infrastructure. The Council recognises that there are significant areas of existing employment and as part of the growth strategy will identify future potential. Currently, these will mostly be in our Strategic Industrial Location (SIL), Locally Significant Industrial Sites (LSIS), non-designated employment areas, and within our emerging growth and investment areas as set out in Chapter 2. In these areas suitable employment uses will be encouraged, and in some cases protected and expanded, where appropriate we will look to reinforce their success by new development.
- 6.1.7 In creating mixed use areas, it is important that new uses contribute to neighbourliness to create successful places, generally working on the basis of ‘Agent of Change’ principles. Depending on the area, there will be different emphasis as to which uses have to be compatible with which, seeking to appropriately buffer SIL and LSIS and night time economy clusters, but also key residential areas, whilst generally recognising new employment floorspace design is much more compatible with residential than some existing floorspace, and in some areas cumulative impacts need. Similarly, in some cases, out of centre town centre uses will need to ensure impacts on town centres, through demonstrating need will need to be addressed.

E1 Draft policy approach: Business and job growth

The Council will seek to attract investment in the knowledge economy and technology businesses and support the existing business base, maximise quality employment potential and create a dynamic business environment through protection and development of high quality premises and places.

We will achieve this by:

- a) Realising the benefits of the borough's connectivity, profile and existing and emerging sectoral strengths to secure a supply of land, infrastructure, premises and places capable of attracting investment in growth sectors and supporting the existing business base;
- b) Promoting employment, industry and logistics as Strategic Industrial Location (SIL) and Locally Significant Industrial Sites (LSIS), and important components of sustainable mixed use places, whilst recognising the need for land to be strategically managed to ensure premises and places meet the needs of business, visitors, the economy, the environment, Enfield's residents, meet evidenced need and demand, benefit from the 'agent of change' principles and make efficient use of land (see draft policy approach E2);
- c) Focusing employment growth in our emerging growth and investment areas (see Chapter 2) proportionate to their function and character;
- d) Directing office development (Use Class B1(a)) to our town centres in accordance with draft policy approach E3;
- e) Directing major industrial development to and where appropriate to intensified (including support for displaced businesses) at SIL and LSIS, in accordance with draft policy approach E2;
- f) Promoting town centre uses including the evening and night-time economy uses to our town centres (see chapter 7), including

our emerging growth and investment areas (see Chapter 2), proportionate to scale, ancillary to other to uses and in accordance with the NPPF sequential test; and

- g) Encouraging small-scale, start-ups and/or creative workspace to our town centres and growth and investment areas, and where appropriate masterplanned as part of mixed use sites.

Figure 6.1: Enfield's industrial legacy as seen within the Upper Lee Valley context



6.2 Approach to employment land

- 6.2.1 The Council is required to plan positively, and this includes support for existing and new employment sectors, whilst not protecting land that has no reasonable prospect of use. This draft policy approach seeks to ensure the supply of land to support economic and other growth needs, i.e. including industrial and other employment, housing, social, green infrastructure, waste, transport and utilities.
- 6.2.2 Enfield is a strategically important industrial location for London. It has the locational advantage and balance of infrastructure to enable businesses to adequately have access into London and beyond, which is to be enhanced through improvements to the railway and Piccadilly lines, and the potential arrival of Crossrail 2. In order to assess employment land needs across the borough in line with our vision, the Council will update its Employment Land Review. The Review will seek to qualitatively audit the existing employment land alongside a commissioned study to objectively assess future demand for employment space over the plan period.
- 6.2.3 In comparison to the rest of London, Enfield has over 400ha of employment land currently in industrial use, of which 326ha of land is occupied by core industrial and warehouse uses or is vacant. Floorspace measures approximately 1,271,800 sqm. The supply is primarily focused along two axes: in the Upper Lee Valley running north to south of the borough and the A406 corridor to the south, running east to west. The profile of industrial businesses operating in the borough is mixed, with a reasonable contingent of larger businesses present engaged in logistics and warehousing operations, concentrated in the Upper Lee Valley, whilst small-medium enterprises (SMEs) with a local/sub-regional market reach dispersed throughout the borough though principally in the south and east.
- 6.2.4 The majority of employment land lies within Strategic Industrial Location (SIL) and several of the Locally Significant Industrial Sites (LSIS) areas remain the most suitable locations in Enfield for accommodating industrial and warehousing demand based on their characteristics and assessed quality for example, the excellent strategic road access to markets and supply chains, access to an appropriately skilled workforce, the size of industrial clusters, and the clear demarcation and separation from sensitive uses. Land is also occupied by wider industrial uses, which serve strategically important city-functioning roles.
- 6.2.5 Vacancy among industrial premises is low, vacant churn is generally strong and rental values are relatively buoyant – all of which points towards supply being in a generally healthy state.
- 6.2.6 Initial study work has indicated a potential demand for around 50ha of industrial land during the plan period. Though this is unconstrained by supply and policy objectives, which aligns with the identified need in the draft new London Plan. However, the calculated demand cannot be accommodated by current vacant land and development opportunities. The supply-demand imbalance suggests a need to find a better use of existing space through intensification, the promotion of mixed use development, and the identification of new sites.
- 6.2.7 Given the influence of ‘hope value’ for residential development and ongoing displacement pressures, protection of sites to meet demand is recommended. However, this goes hand-in-hand with proposed release/transition and also the acknowledgement of the need for consolidation of industrial uses.

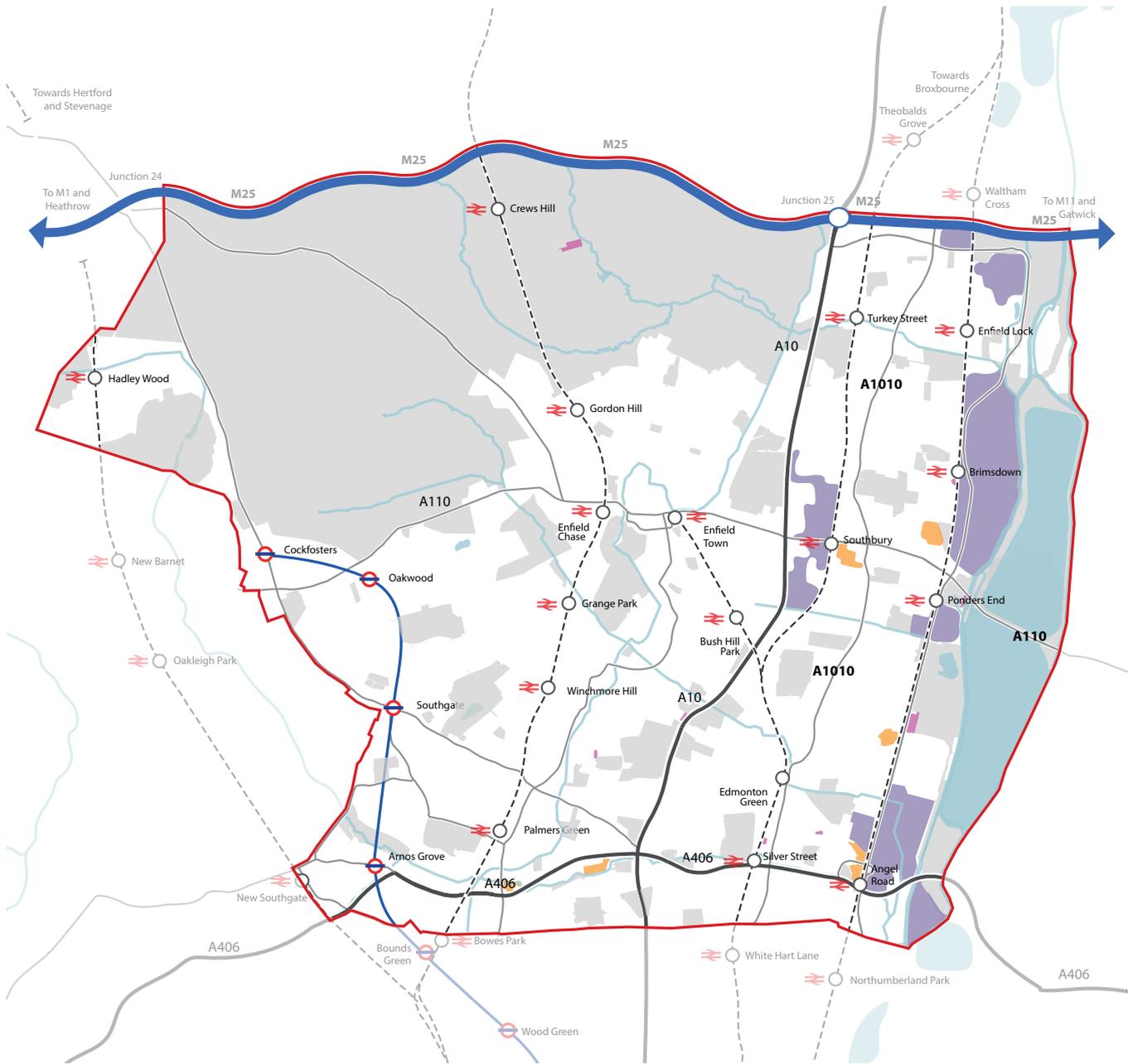


Figure 6.2: Map showing Strategic Industrial Locations and Locally Significant Industrial Sites designations and other non-designated industrial sites

- | | | | |
|--|----------------------------|---|--------------------------------------|
|  | Enfield borough boundary |  | Open space |
|  | Railway |  | Waterbody |
|  | Piccadilly line |  | Strategic Industrial Location |
|  | Primary roads |  | Locally Significant Industrial Sites |
|  | National Rail station |  | Non-designated employment sites |
|  | London Underground station | | |

- 6.2.8 As with London as a whole, the plan-led Managed Release, Managed Transition and Managed Intensification approach is therefore vital to ensure that the borough carefully manages its stock and overall transition to a mixed-use borough to best effect.
- 6.2.9 At present, through our Core Strategy policies, industrial land and employment sites are designated as either SIL or LSIS, which is consistent with the current London Plan regarding the protection of industrial land. Such designations ostensibly protect these sites from redevelopment for any non-B use. The employment land designations are identified on Figure 6.3, on the left.
- 6.2.10 Enfield’s portfolio of SIL and LSIS sites continue to make a valuable contribution to local employment and provide important local and strategic services. The Council recognises the role these play in providing a range of jobs and therefore first and foremost seeks to protect its industrial land alongside growth of new business space.

The need for change to accommodate growth

- 6.2.11 Whilst the majority of designated industrial land in Enfield is recommended for retention, the Council needs to consider policy measures to support change on industrial land to support growth in the borough over the plan period. In order to optimise the existing portfolio of land, the Council, through an evidence-led approach will set out the locations across the borough where: 1) substitution and consolidation; 2) intensification; 3) mixed use development, i.e. where regeneration opportunities exist and demand or appetite; or 4) the release of poor quality designated land for more productive means. The starting point is an understanding of what presently exists on site, its economic role and locational requirements, which will in many cases require continued access to the local market.
- 6.2.12 Managed Intensification, requires careful attention to the need of SIL and LSIS uses on site, and how they could be intensified without compromising their operational functionality. Functionality considerations will include, for example continued provision of adequate yard space, road access, ability to accommodate flexible working patterns, wider ability to accommodate projected industrial/warehousing demand, in some cases due to impacts on adjacent SIL/LSIS.

Figure 6.3: Industrial land along the Lee Valley corridor



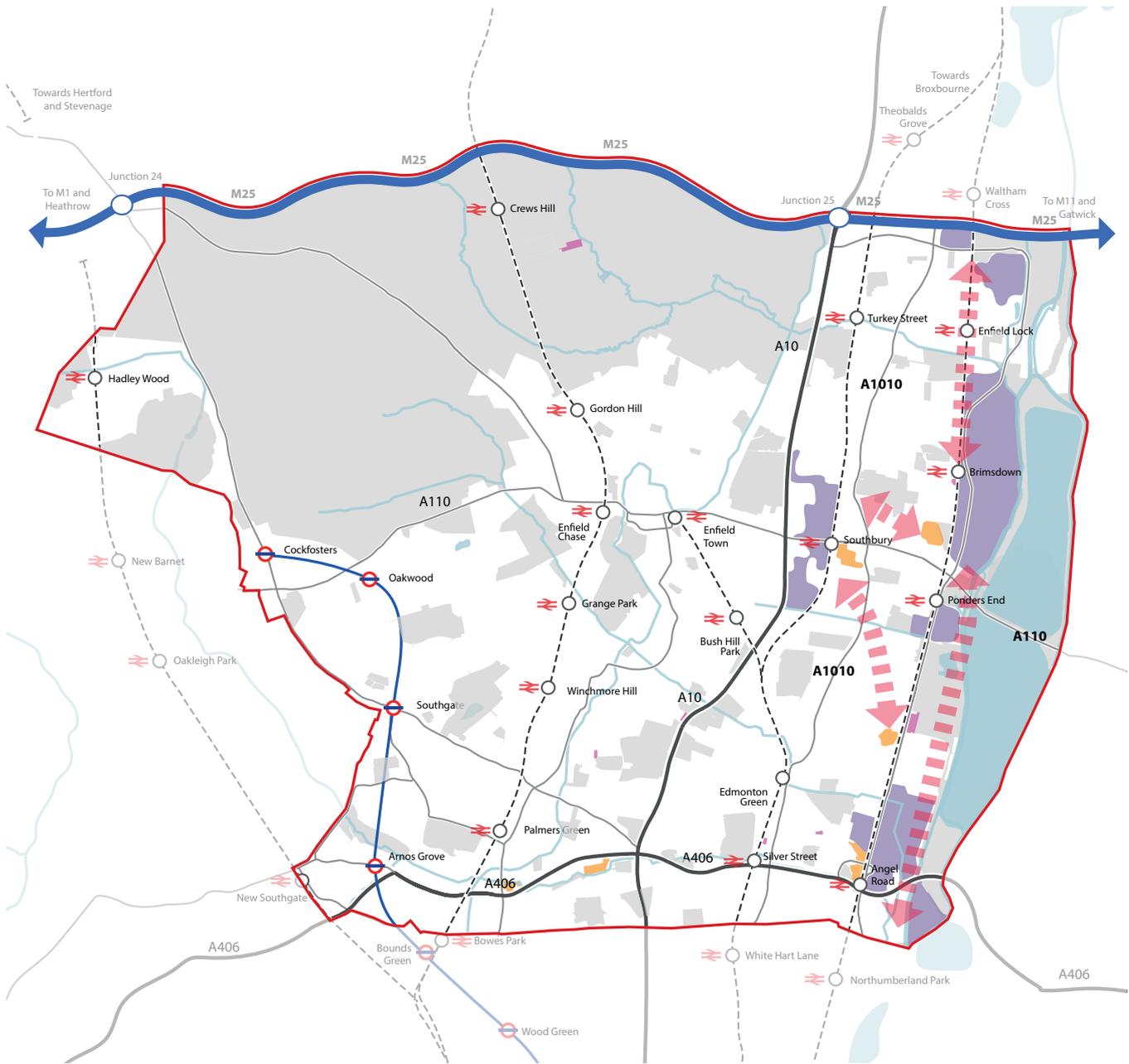


Figure 6.4: Managing the future of Enfield's industrial areas

Key

- | | |
|----------------------------|--|
| Enfield borough boundary | Open space |
| Railway | Waterbody |
| Piccadilly line | Strategic Industrial Location |
| Primary roads | Locally Significant Industrial Sites |
| National Rail station | Non-designated employment sites |
| London Underground station | Potential areas for substitution and consolidation |

Substitution and consolidation

- 6.2.13 The draft London Plan identifies the borough as a location where strategic demand for industrial logistics and related uses is anticipated to be strongest, associated with the growth of London and the need to provide activities crucial to for the City’s metabolism. This requires intensified and additional floorspace capacity in either existing and/or new locations. One approach to fully capture the benefits of strategic transport investment in the eastern corridor would be a proactive approach to facilitate the substitution and relocation of SIL within the borough to new location(s) accessible to the strategic road network.
- 6.2.14 Facilitating such moves within the borough would ensure that the diverse economic profile of Enfield’s industry remained within the same property market area with no impact on their proximity to businesses and customers, labour markets and commuting patterns, supply-chains and logistics. It would retain the diverse employment opportunities in the borough and provide new spaces and capacity for Enfield’s industry to grow, innovate and diversify in response to proximity to central London and the London-Stansted-Cambridge Innovation corridor. At the same time substitution could support a more efficient use of land in those parts of the borough that will benefit from new transport investment and therefore help the borough to deliver maximum new homes and jobs.
- 6.2.15 It is impractical to suggest that the scale of new employment land required could be found within the existing urban areas and therefore whilst at the same time assessing the land requirements for new housing in the Green Belt we also need to consider what if any industrial land might need to be delivered in the Green Belt if the relevant strategic requirements are to be met.

Figure 6.5: Example of residential use above light industrial use, Cambridge Heath, Hackney

Intensification

- 6.2.16 Intensification of industrial land could occur in several ways, such as; increasing building footprints within sites and plots; use of vacant land, and; changing the form or typology of buildings to provide more workspace.
- 6.2.17 Broad areas where intensification would be appropriate comprising mostly SIL areas include, though should be not limited to:
 - Brimsdown;
 - Great Cambridge Road and Martinbridge Trading Estate;
 - Aztec Park 406; and
 - Eleys Estate.
- 6.2.18 Examples where intensification has worked successfully are in Kensington and Chelsea, Hammersmith and Fulham and Hackney.



Mixed use

- 6.2.19 Another means by which new employment space of specification appropriate to the needs of modern occupiers can be delivered would be via mixed-use redevelopment of sites where transport accessibility and access to facilities and amenities is strong enough to support non-B uses and B1a/b/c uses.
- 6.2.20 Whilst our portfolio of sites is well-functioning and the impetus for mixed-use development may not exist, opportunities may exist in the south-east over time through planned regeneration at sites already close to stations, for example, at and around Edmonton Leaside, such as Harbet Road and the non-designated Argon Road industrial estates which lie close to Angel Road station, or Queensway Industrial Estate close to Southbury and Ponders End stations. Such opportunities could include housing as part of a mix of employment and commercial uses, provided this does not undermine the overall business function of the area.

Release of designated industrial land

- 6.2.21 In keeping with the principles of the NPPF and the draft London Plan, when assessing the appropriateness of employment land stock for ongoing use, the Council considers wider regeneration objectives and demand for other use, with consideration given to sites which are in poor quality or are underused. Where such sites are identified, the Council could permit a change of use away from industrial use.
- 6.2.22 However, release of designated sites does not automatically mean the loss of the industrial uses and employment on-site but opens the possibility for the market to intervene to provide sustainable redevelopment under the right conditions. Alma Road, Regent's Avenue and Claverings Industrial Estate offer opportunities for release. In doing so, these sites can be released to more productive use such as housing, whilst in appropriate locations also offering the opportunity to secure compatible business space for modern business needs as part of mixed use developments.

Figure 6.6: (below) Computer generated image of housing creative London - a mixed use building with affordable rental units above, workspace and supporting uses for the creative sector below, at Meridian Works, Meridian Water



Figure 6.7: Example of student accommodation above industrial building, Travis Perkins, Kings Cross Central





E2 Draft policy approach: Approach to employment land

The Council will seek to achieve more efficient use of employment land to support economic growth sectors and a higher jobs density both through the retention of the most suitable locations and with the managed release of land that is/or becomes surplus to requirements for such uses over the plan period.

We will achieve this by:

- a) Achieving more efficient use of employment land to support economic growth sectors and wider growth needs through the retention of suitable locations and capacity, intensification with no net loss of functionality, and limited, plan-led managed release of land;
- b) Managing the positive and negative impacts of employment-generating uses to ensure a managed transition to successful mixed use places through co-location, intensification and mixed uses;
- c) Protecting and directing industrial activity to the borough's Strategic Industrial Locations (SIL) and Locally Significant Industrial Sites (LSIS) as identified in Figure 6.3 for protection, managed intensification and as suitable in principle for use classes B1(b), B1(c) B2 B8, appropriate sui generis employment uses including waste, utilities and transport depots, with other supporting facilities including B1(a) uses where ancillary in scale and function. Proposals falling outside the above uses will be resisted.
- d) Facilitating a release of sites, subject to managed release criteria and where proposals are in line with the vision set out in the new Local Plan and in accordance with other successful place making policies;

- e) Supporting floorspace for new purpose built modern flexible office and business accommodation in our emerging growth and opportunity areas (see Chapter 2) and other land previously used for employment purposes to accommodate small and medium enterprises (SMEs) falling in Class B1; and
- f) Proactively supporting substitution and consolidation within the borough to new location(s) that are accessible to the strategic road network where such location(s) are able to demonstrate:
 - Limited or no impact on their proximity to businesses and customers, labour markets and commuting patterns, supply-chains and logistics; and
 - A more efficient use of land in those parts of the borough that will benefit from new transport investment.

Locally Significant Industrial Sites

In areas protected as LSIS the Council will support:

- g) Introduction of small units;
- h) Development of multi-storey schemes;
- i) More efficient use of land through higher plot ratios having regard to operational requirements including servicing and mitigating impacts on the transport network, where necessary;
- j) Employment-led schemes which include housing and live/work units as long as it does not prejudice the ongoing use of the area for business purposes, there is no net loss of employment floorspace, and where residential use is compatible with existing employment uses; and

k) More effective and efficient use of Alma Road, Regent's Avenue and Claverings Industrial Estate by managing the release of employment land considered to be underutilised, outdated and/or poorly performing.

l) Proposals for alternative uses should:

- Demonstrate the premises have been vacant for over 12-18 months, following active marketing using reasonable terms and conditions, and has no reasonable prospect of being occupied for another business use; and
- Include compatible modern fit for purpose employment uses, which could include live/work units, as part of any new or replacement mixed use schemes.

The release of employment land will be carefully managed over the plan period.

Proposals involving the loss of employment floorspace and jobs will be expected to:

- Have in place a strategy to deal with the relocation requirements of existing businesses that cannot be incorporated within a redevelopment, making reasonable endeavours to ensure they have a suitable alternative site secured, including transitional arrangements, in line with their local and regional role; and
- Where release to solely residential use is proposed, marketing evidence at locally benchmarked prices/rents through local agents for a period of at least 12 months for the full range of permitted uses, including the option for sub-division and mixed-use development incorporating the viable employment uses;
- Ensure neighbourly development is achieved (in line with relevant draft policies in this Plan), whilst not jeopardising the functioning of any remaining employment uses, including those incorporated within the redevelopment; and

- Demonstrate that new employment floorspace within the redevelopment is designed to respond to evidenced market demand and occupier requirements to secure viable occupation.

Intensification

Proposals involving intensification will be expected to demonstrate:

- Genuine intensification that maintains or increases capacity of the relevant SIL or LSIS land use; and
- There is no net loss of functionality, including ability to meet evidenced local and appropriate strategic industrial and warehousing demand.

Live/Work Units

Mixed use employment-led schemes, which include housing and live/work units will be supported as long as it does not prejudice the on-going use of the area for business purposes, there is no net loss of employment floorspace and where residential use is compatible with the employment use. Where live/work units are proposed:

- The workspace should be compatible with the residential element;
- The residential element should meet other policy requirements in the Local Plan;
- Affordable housing requirements will be applied in line with draft Policy Approach: H2; and
- The character and function of the surrounding area should not be compromised.

Partnership Working

The Council will continue to play an active role in relevant local economic partnerships and other sub-regional partnerships, e.g. London-Stansted-Cambridge Innovation Corridor to create a clear vision and provide a strong voice for Enfield's economic development and infrastructure needs.

6.3 Office

- 6.3.1 Offices provide an important component of local employment. Initial study work has indicated that there is approximately 217,500 sqm of office floorspace in the borough, accommodating local level provision servicing local market, with some limited sub-regional reach. This stock is primarily located within or close to the town centre areas of Enfield and New Southgate with a further limited presence within the SIL and LSIS areas.
- 6.3.2 The market is dominated by a supply of small units and several larger multi-tenanted premises close to the town centres, with vacancy levels being low. Stock within industrial areas is mostly low-grade. Currently, public transport accessibility level (PTAL) ratings are mostly below that required to attract large-scale development, and attracting occupiers from beyond the local market is and will continue to be a challenge.
- 6.3.3 In order to plan for the future, there is an estimated additional demand for approximately 24,000 sqm of office floorspace in the plan period, representing an 11% increase to existing stock. This is not to say that demand could be stronger, particularly if the policy context supported office space growth through, for example, masterplanning of key growth areas such as Edmonton Leaside. There is potential for step change in demand through new infrastructure provision such as Crossrail 2, were it to come about, which would act as a significant driver of office space demand.
- 6.3.4 Initial study work has indicated the most suitable locations for accommodating this additional demand will be Enfield Town and New Southgate district centre. Where mixed-use development opportunities present themselves, it may be appropriate to accommodate a quantum of B1 a/b space within redeveloped sites, such as at Edmonton Leaside. As noted above, mixed-use development of reasonable density should occur only where PTAL ratings and access to facilities and amenities allow.



E3 Draft policy approach: Office

The Council will support a minimum of 24,000 sqm of new purpose built modern flexible office and business accommodation in Enfield Town and New Southgate, our growth and investment areas, and other land previously identified for employment purposes to accommodate small and medium sized enterprises (SME) falling in Class B1.



Figure 6.8: Example of co-working workspaces

6.4 Supporting small business

- 6.4.1 In addition to the provision of new purpose built modern office space in the right locations, the Council will also seek to promote economic diversity, support existing and new small and medium sized enterprises (SMEs) in the borough by providing affordable, flexible and well managed workspace.
- 6.4.2 Many SMEs require affordable premises, studios or workspaces with favourable lease or licence conditions, and many SMEs and start-ups with the potential for financial self-sufficiency have particular needs that often cannot be met by market rent levels.
- 6.4.3 The Council is aware that suitable and affordable workspaces need to be provided given that neighbouring boroughs, particularly east London have reached a saturation point and have little capacity to accommodate further demand. In addition, the space requirements are often much smaller than 'traditional' office space, often less than 80sqm, which is the average size of a small shop.
- 6.4.4 Given this, the Council will seek to include a proportion of affordable workspace within major mixed-use schemes and commercial schemes in our emerging growth and investment areas as identified in Chapter 2 of the Plan. In addition, the Council will seek the inclusion of affordable workspace on replacement or new mixed-use developments in SIL, LSIS and non-designated employment sites to ensure there is no net loss of jobs on these sites.
- 6.4.5 Low cost or open workspaces can be designed and managed to support SMEs and will vary depending on the end occupier or sector. The Council recognises that unit sizes of approximately 80sqm or less (gross) are more desirable and will support typologies that are usually flexible, shared facilities and/or low-cost or managed workspaces, ensuring that they can cater for a range of business needs. Often these include office space with flexible and/or low-cost rental terms, co-working spaces, incubator spaces, accelerator spaces, creative/artist spaces and makerspaces. Shared facilities could help create workspaces which are more space efficient and more viable as costs can be shared; also help promoting the sharing economy through the collective and efficient use of resources.
- 6.4.6 The Council will approve a workspace or studio provider either by going through a process to evaluate and select providers to develop an approved workspace or studio provider list or by determining the suitability of the proposed workspace or studio provider(s) on a case by case basis, against the above criteria. This approval will be required in order to ensure that the low cost or open workspaces will be managed appropriately.
- 6.4.7 Proposals for these typologies must be informed by the business needs and design requirements of relevant workspace providers. The provision of low cost workspace should normally go beyond 'shell and core' and include basic fittings which enable them to be more affordable for occupation by micro or small businesses. The specification should be discussed and agreed by the intended occupier or workspace/studio provider and will be secured via a legal agreement.
- 6.4.8 The Council will also seek appropriate provision for short term, flexible or 'meanwhile' leases, and/or letting space on a per-desk rather than per-square-foot basis. This will be in addition to ensuring existing businesses are also re-provided for, where appropriate in any redevelopment of sites, given it is the Council's ambition to ensure there is no net loss of floorspace, and jobs, allow existing business to remain and grow as well as attract new businesses to the borough.





E4 Draft policy approach: Supporting small business

The Council will support existing and new businesses in the borough.

We will achieve this by:

- a) Seeking the provision of new business (B1) floorspace, such as incubator space, either in new mixed use or commercial schemes within our growth and investment areas or as part of employment-led/mixed use schemes in SIL, LSIS and/or non-designated employment areas;
- b) Providing flexible space within residential units particularly in town centres, that can be used for home working and start-up space where feasible;
- c) Seeking the provision of a range of unit sizes, that are flexible, suitable for subdivision and configuration for new uses and activities, including for occupation by small or independent commercial enterprises; and

- d) Through the use of planning obligations, the appointment of managed workspace providers where new business space is provided, to ensure development caters for a range of business needs and users.

We will expect development proposals to:

- e) Be of a satisfactory quality, appropriately located, well designed, readily available and adaptable to meet changing business needs, and
- f) Demonstrate that they are suitable for supporting small and medium sized enterprises (SME) businesses, having regard to ensuring appropriate size and type of workspace.

Developers of mixed use schemes will be encouraged to engage with workspace providers at the design stage to ensure new commercial space meets end user requirements.

Figure 6.9: Example of co-working workspaces





6.5 Skills and access to employment

- 6.5.1 The Council is committed to ensuring that residents seeking work have the right skills to gain employment and that employment opportunities exist, as a key component of economic growth, sustainable communities, and successful places. In doing so, the Council seeks to harness the benefits of development for as wide a group as possible, spreading them beyond its immediate vicinity and across the borough.
- 6.5.2 Enfield is the 64th most deprived local authority in England, however our average score has not worsened in the last five years. However, Enfield has become more deprived when compared with other London boroughs. In 2010, Enfield was the 14th most deprived borough in London, whereas in 2015 it was the 12th most deprived. Whilst this is an improvement, there are serious employment challenges facing the borough with further, life expectancy amongst residents remaining lower than the London average.
- 6.5.3 The number of people of working age on Out-of-Work benefits in Enfield was 19,590 in May 2016, representing an estimated 9.3% of the working age population. Both the number and the rate have fallen significantly since May 2011, when the rate was 14.4%. On average, the proportion of people receiving out of work benefits in London as a whole was 7.7%.
- 6.5.4 In terms of qualifications held by adults, the most accurate assessment is the 2011 Census. As of that year, 23.0% of Enfield adults aged over 16 years had no qualifications compared to a London average of 17.6% and a national average of 22.5%. The more recent Annual Population Survey for the year to December 2015 estimates that only 4.5% of Enfield residents of working age (16-64 only) had no qualifications (compared with 8.5% for England and Wales), and that 43.6% of Enfield's working age residents were qualified to NVQ Level 4 and above.



E5 Draft policy approach: Skills and access to employment

6.5.5 The Council and its partners for example with the College of Haringey, Enfield and North East London (CONEL) are assisting residents in creating opportunities to gain apprenticeships and attendance on training programmes. Current projects include: the Council’s job brokerage mechanism, Education-Business Partnership and the ongoing work and investment of a range of education providers, which will support skill development in range of sectors for all levels of employment types. The spatial strategy, growth vision, jobs target and planning policies help to further this work, by supporting partners’ investment, growth sector needs, and more directly connecting residents and businesses with opportunities.

6.5.6 The Council wants to encourage awareness of opportunities for local residents to the companies on the doorstep and future opportunities for employment. We are already starting to do this by working with the Greater London Authority (GLA) in developing sector and supply chain groups and colleges that are involved in and supporting these sectors through aligning their courses to the needs of current students and businesses and positioning for future market opportunities in growing markets. Ensuring a skilled workforce will also have the benefit of encouraging businesses to both locate and remain in the borough, as well as enabling more sustainable patterns of travel to work.

The Council will ensure that more Enfield residents will have a share in the increase wealth associated with the growth and investment in the borough.

We will achieve this by:

- a) Working with our partners to tackle barriers to work, enhancing the employability and long-term employment prospects for all Enfield’s residents, regardless of health or disability status, including through improvements to aspirations, skills and educational attainment, childcare and training provision, and access and support to employability projects established by the Council and other partners;
- b) Promoting local labour agreements and procurement in the construction and operation of new development;
- c) Supporting start-up and continued development of small and medium sized enterprises; and
- d) Working with providers and partners to support the location of higher and further education colleges and universities within the borough to provide new training opportunities for residents.

We will expect development proposals to:

- e) Deliver construction training in conjunction with the Council’s recognised providers for all major developments; and
- f) Enter into legal agreements with the Council, where appropriate to support employment, skills development, apprenticeships and other education and training opportunities in both the construction and end-use phases. The Council will ensure these are implemented in ways that:
 - Enable trainees to complete their training and apprenticeships;
 - Ensure the greatest level of take-up possible of the training, apprenticeship and employment opportunities created; and
 - Increase the proportion of under-represented groups within the construction industry workforce.

Figure 6.10: (right and left) Construct with Us event, Meridian Water, part of Enfield Council’s Build Enfield campaign collaborating with industry leaders, for students, apprentices and job seekers, 2017.



6.6 Digital infrastructure

- 6.6.1 The NPPF requires the Council to facilitate telecommunications development, including high speed broadband technology as essential for sustainable economic growth and in enhancing the provision of local community facilities and services, while ensuring as far as possible that any visual impact of the structure on valued features of the borough's environment is minimised. Fast and reliable digital connectivity is vital for a modern economy and society. It underpins the innovative and growing sectors of the economy and is an important component in facilitating regeneration.
- 6.6.2 This is an area where technology changes quickly, with the platforms for a digital economy building upon a range of infrastructure including optic fibre, computers, servers, sensors, devices, masts, distribution, satellites and energy. The physical distribution and networks of these need integrating and managing in ways to support and enable the development and sharing of data, service applications and connectivity.
- 6.6.3 Currently, digital connectivity is limited by issues including the availability of fibre and the speeds delivered. Some parts of Enfield have poor connectivity, putting them at a significant comparative disadvantage.
- 6.6.4 Where planning permission is required, the Council is keen to minimise any adverse impact of such development on visual amenity, aural amenity, and on public safety including movement without restricting its provision.
- 6.6.5 All applications for development are encouraged to consider, along with all relevant to operators, how the needs of the occupiers will be met. Sensitive and innovative design and integration/ dual use will be required to reduce impact, to minimise street/skyline clutter and the proliferation of infrastructure on top of or attached to buildings or structures.



E6 Draft policy approach: Digital infrastructure

The Council will promote the development of advanced, high quality communications infrastructure to support economic growth and more accessible, inclusive communities.

We will expect development proposals to:

- a) Achieve greater digital connectivity than set out in Part R1 of the Building Regulations;
- b) Ensure that sufficient ducting space for future digital connectivity infrastructure is provided;
- c) Meet the requirements for mobile connectivity within the development and take appropriate mitigation measures to avoid reducing mobile connectivity in surrounding areas; and
- d) Support the effective use of the public realm such as street furniture and bins, to accommodate well-designed and located digital infrastructure.



6.7 Creative Enterprise Zone

- 6.7.1 Creative industries play an important role in London's economy and its cultural offer and as a sector it is growing at a faster rate than any other area of the economy.
- 6.7.2 Through our regeneration projects, the Council is pioneering the creation of a haven for makers, creators and artists, including Europe's largest open workshop for in Meridian Water.
- 6.7.3 Meridian Works is the start of a new commercial vision for Meridian Water, diversifying away from Enfield's traditional warehouse, logistic and light industrial offer into a broader maker/creative offer that builds on the heritage of the area. Over the next 20 years there will be high-quality jobs brought to Meridian Water in sectors as diverse as high-end manufacture, e-commerce and pharmaceuticals build on this vision. The Council is leading this diversification by ensuring policy and delivery mechanisms are aligned to this vision.



E7 Draft policy approach: Creative Enterprise Zone

The Council will promote Meridian Water as a Creative Enterprise Zone building on the heritage of the area.

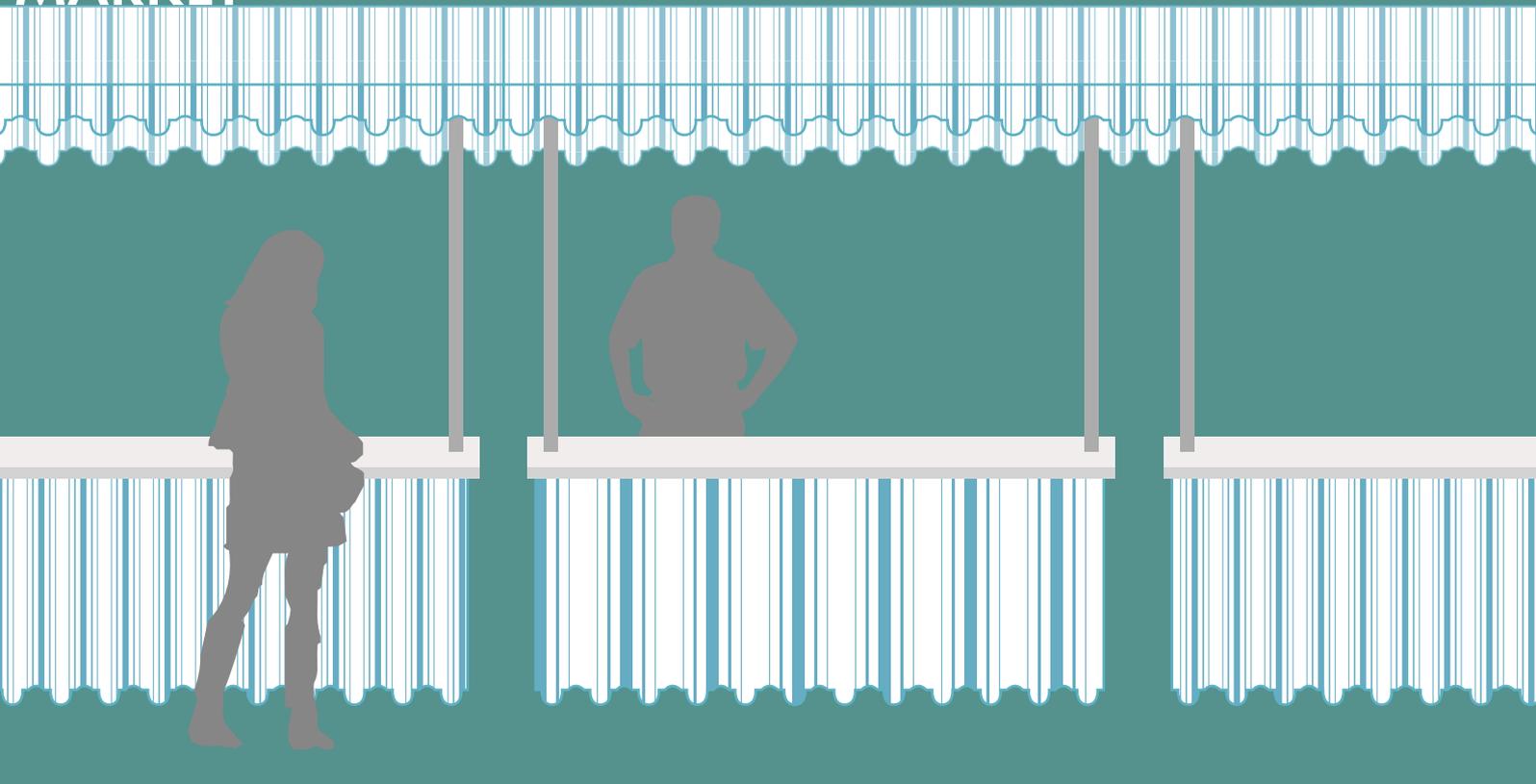
We will achieve this by:

- a) Working with our partners and developers to develop, enhance, protect and manage new and existing creative workspaces, providing flexibility for changing business needs and an attractive business environment with related ancillary facilities;
- b) Supporting existing businesses and the development of spaces that are suitable, attractive and affordable for the creative industries, taking into account the particular requirements of established and emerging creative businesses; and
- c) Encouraging the temporary use of vacant buildings and sites for creative workspace and industries where they contribute to the achievement of wider objectives in the Plan such as economic vitality and diversity of a town centre or intensification of an industrial area.

Figure 6.11: (below) Illustrative sketch of Meridian Works



MARKET



7 Planning for vibrant town centres

7.1	Enfield's town centres	127
7.2	Successful town centres	132
7.3	Meanwhile uses	137
7.4	Evening and night time economy	139

A diverse mix of land uses within the town centres is supported

Digitalisation of our town centres is supported

There needs to be an evening/night time economy
Arts and cultural activities within the town centres are supported

What respondents said about town centres as part of the 2015 Consultation and Enfield Conversation

The town centre offer needs to be improved to make them more as places and destinations

There are too many empty shops in the town centres

There is a need for more vibrancy and vitality within the town centres



7 Planning for vibrant town centres

7.1 Enfield's town centres

Locations and impacts of town centres

7.1.1 Enfield has designated a town centre hierarchy as set out in the Core Strategy, which focuses town centre uses that generate high footfall in accessible locations for those working, living in and visiting the area. The town centre hierarchy focuses town centre uses into five principle locations:

- Major centre;
- District centres;
- Large and small local centres; and
- Local parades.

The town centre hierarchy is shown overleaf as Figure 7.1



Town centre hierarchy

7.1.2 Enfield Town will be promoted as the borough's main town centre for comparison shopping and a diverse mix of other retail, business, evening, leisure and community activities and significant residential growth. Accordingly, the majority of the retail growth is proposed to be located in Enfield Town and the Council will support development that improves the vitality and viability of the centre.

7.1.3 District Centres have a more localised role and are intended to complement Enfield Town, by providing reasonably sized facilities for main and bulk convenience food shopping and a reasonable range of comparison shopping facilities. The district centres are: Angel Edmonton, Edmonton Green, Southgate and Palmers Green. Each centre has its own characteristics we can enhance and celebrate.

7.1.4 New Local Plan policies will seek to provide further shopping and leisure uses at an appropriate scale to meet locally generated needs.

7.1.5 In key local centres the aim to is to ensure a greater variety of uses than in local parades. However, in both types i.e. large and small, the Council's approach will seek to retain a predominance of shopping over other uses in the first instance. These centres can help contribute towards the identified estimated need for further comparison and convenience retail floorspace to meet the needs of the local population and will continue to be supported.

7.1.6 In local parades, where shops and premises have been vacant for a long time, there will be more flexibility and possible alternative uses. These could include: small offices, health facilities and other A Class uses.

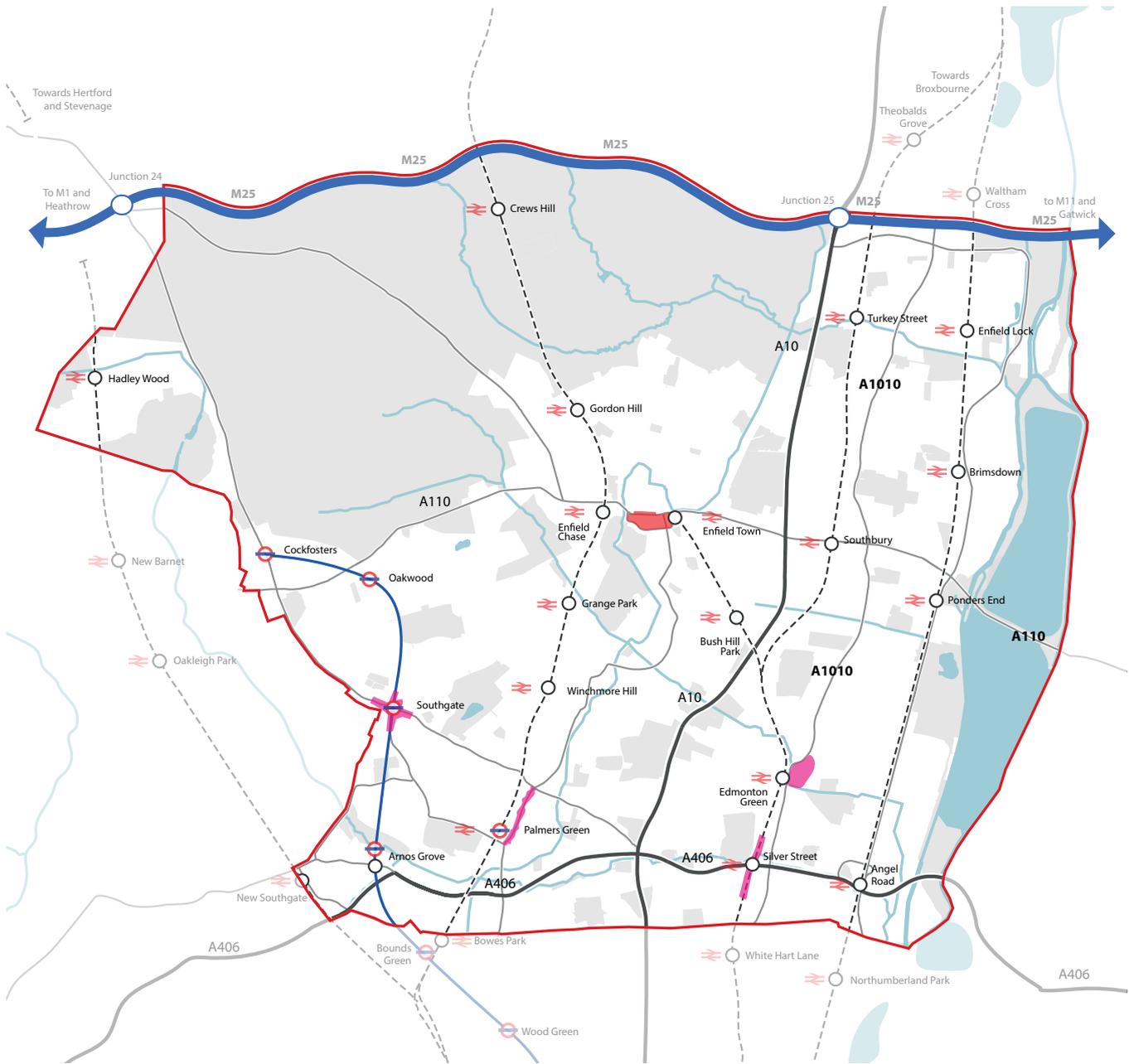


Figure 7.1: Map showing Enfield's town centres

Key

- Enfield borough boundary
- Railway
- Piccadilly line
- Main routes
- Open space
- Waterbody
- National Rail station
- London Underground station
- Major Town Centre
- District Centre

- 7.1.7 The Council endorses the town centre first approach to the development of new town centre uses, as a central component to maintaining the character of successful and diverse centres and optimising accessibility to these uses. However, the Council recognises the need for flexibility to meet changing needs.
- 7.1.8 It may be appropriate for edge or out of centre town centre uses to help meet the area’s town centre use needs over the next 20 years. This could also include the potential need for temporary or meanwhile space to serve needs in early phases and town centre uses needed to support the construction community, associated with the construction of large schemes in the borough, such as Meridian Water. Where proposals for town centre uses are located outside of a designated centre, the Council will expect the applicant to demonstrate a sequential approach to site selection, focussing uses firstly on the edge of designated town centres.

7.1.9 In terms of small scale walk-to town centre uses, the Council recognises that these uses can help businesses in Strategic Industrial Locations (SIL) and Locally Significant Industrial Sites (LSIS) in the borough that may wish to sell their produce on their premises to cater for the needs of workers and help to improve the character and vibrancy of the area. Proposals for this sort of operation will therefore generally be supported but will need to ensure that any negative impacts on the transport network are minimised and that they do not have a detrimental impact on the vitality and viability of designated town centres. Any such uses should be small-scale and be in accordance with the London Plan.

Table 7.1: Hierarchy of town centres

Status	Centre		Status	Centre		
Major Town Centre	Enfield Town		Small Local Centre	Aldermans Hill	Amos Grove	Bush Hill Parade
District Centre	Angel Edmonton	Edmonton Green		Cambridge Circus	Freezywater	Hertford Road South
	Palmers Green	Southgate		Main Avenue	New Southgate	Silver Street
Large Local Centre	Baker Street	Hertford Road Central		Windmill Hill		
	Bowes Road	Oakwood	Local Parades	Barrowell Green	Brimsdown	Bullsmoor
	Bush Hill Park	Ordnance Road		Bury Street West	Carterhatch Lane	Chaseville Park Road
	Meridian Water	Ponders End		Durants Road	Dysons Road	Empire Parade
	Chase Side	Winchmore Hill		Enfield Island Village	Enfield Lock	Enfield Road/Linkside
	Cockfosters	including: Broadway, Green and Green Dragon		Firs Lane	Green Street	Hadley Wood
	Enfield Highway			Hazelbury Road	Hertford Road North	Hoppers Road
	Enfield Wash			Huxley Parade	Kempe Road	Mottingham Road
	Green Lanes			Nightingale Road	Percival Road	South Street
		Southbury Road		Southbury Road/Kingsway	Southgate Green	
		The Grangeway	Town Road	Victoria Road		
		Westerham Road	Whittington Road	Winchester Road		

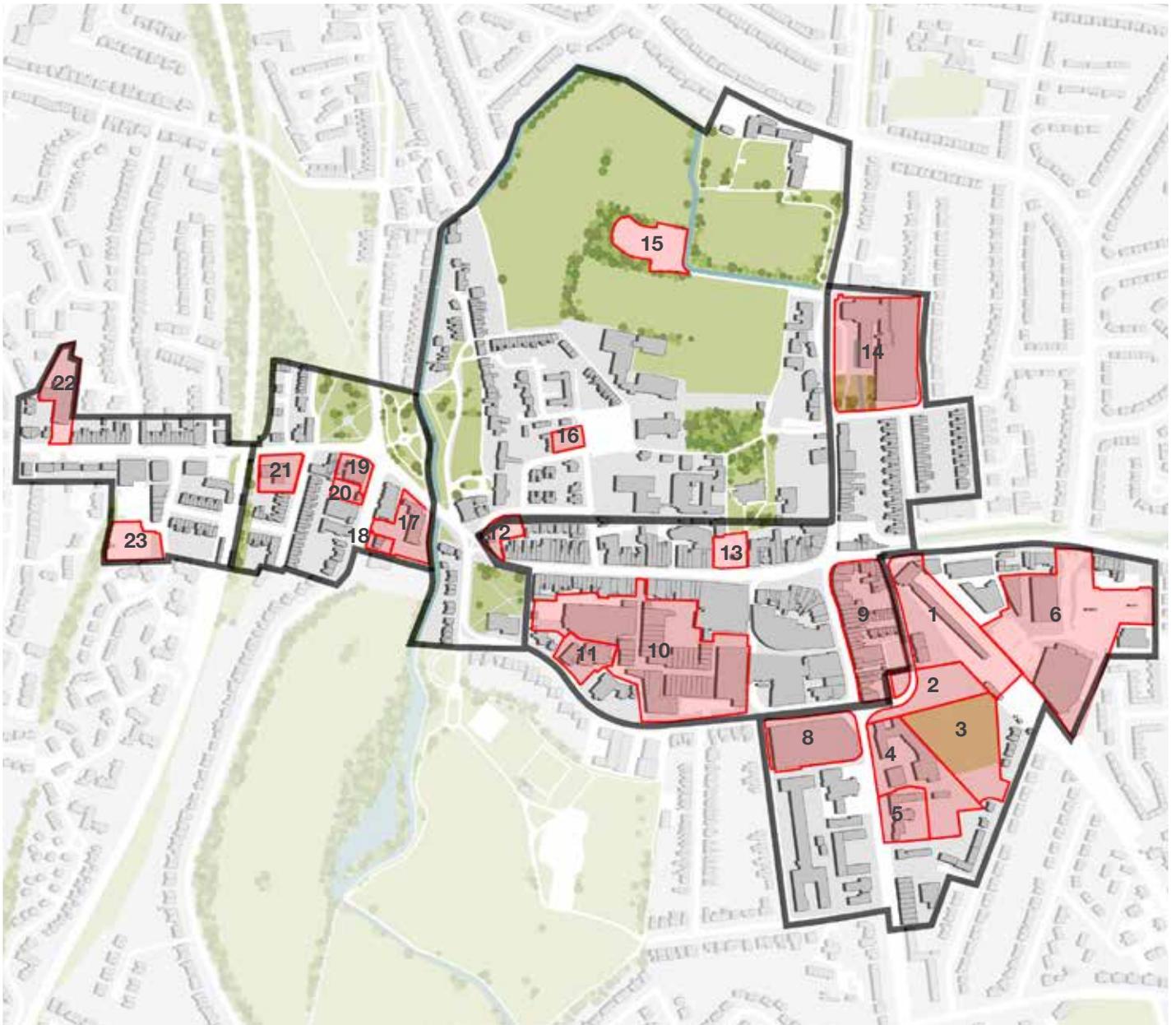


Figure 7.2: Development opportunity sites within the Enfield Town masterplan (2018)

Enfield Town

- 1. Enfield Town Station
- 2. Genotin Road Car Park
- 3. St Anne’s School playing fields
- 4. St Anne’s School
- 5. 52 London Road
- 6. Tesco and Royal Mail
- 7. Genotin Road corner
- 8. Dugdale Centre

Core Centre

- 9. London Road Island
- 10. Palace Gardens Shopping Centre
- 11. BT Exchange, Cecil Road
- 12. Little Park Gardens Bus Station
- 13. Market Place
- 14. Civic Centre

Centre North

- 15. Portcullis Lodge
- 16. Chapel Street / Little Park Gardens Centre West
- 17. Metaswitch
- 18. Old Park Avenue
- 19. Magistrate’s Court Building
- 20. Land to the rear of the Magistrate’s Court
- 21. Ross House

Enfield Chase

- 22. Auto 2000
- 23. Gladbeck Way Car Park

- 7.1.10 Impact assessments are a national requirement for retail, leisure and office schemes outside of designated town centres. This should address the requirements of the NPPF and its associated National Planning Practice Guidance (NPPG), specifically, ensuring that the scale of the development is appropriate within the wider hierarchy of centres. Where necessary, impact assessments will need to take into account the cumulative effect of permissions. The assessment will assess the likelihood of a significant adverse impact on the investment within existing centres, and on their vitality and viability, taking into account the health of the existing centres.
- 7.1.11 Any mitigation being proposed by the applicant should be set out clearly. The approach set out in this section of the Plan is in line with the aims set out in the Corporate Plan to develop vibrant town centres.
- 7.1.12 The Council has adopted a Masterplan Framework for Enfield Town in 2018. This is focused on 'place based' regeneration including improved accessibility, safe, functional and attractive public realm as well as working to attract a diverse mix of land uses aimed at promoting a strong, successful, vibrant and viable town centre. Figure 7.2, to the left shows key sites in meeting this objective, as well as providing new housing are clustered around five core areas including:
- The area around Enfield Town station;
 - The core centre area;
 - The area to the north;
 - The area to the west; and
 - The area around Enfield Chase.
- 7.1.13 Consequently, the Masterplan Framework will be a material consideration when considering planning applications.



TC1 Draft policy approach: Town centres

To support, complement and avoid the significant impacts to the role and function of the borough's town centres, proposals for town centre uses will be supported:

- a) In Enfield's designated town centres, as identified on Figure 7.1 and table 7.1;
- b) Outside of designated centres within the emerging growth and investment areas, as identified in Chapter 2;
- c) On the edge of or outside of designated centres where the sequential approach to site identification has been applied, in accordance with the NPPF sequential test, except for areas in Strategic Industrial Locations (SIL), where town centre uses will only be supported where they do not have an unacceptable adverse impact on the functioning of the SIL, in line with the London Plan; and
- d) Where they provide meanwhile uses (see draft policy approach TC3).

We will expect development proposals to:

- e) Be supported by an impact assessment in accordance with the NPPF and NPPG; and
- f) Contribute to, where appropriate to measures to support the continuing vitality and viability of the town centre.

7.2 Successful town centres

7.2.1 Town centres form an important part of the borough's identity and character, acting as anchors for the local areas with a mix of uses and activities that draw Enfield's communities together. Commonly, there is an expectation that they should be pleasant environments for people to linger and socialise in or pass through, as well as perform a function from a daily, weekly and night time needs perspective, enabling a variety of needs to be met in one trip. This policy approach deals with the concerns around existing and the future of town centres as components of successful places in line with the overarching objectives of the new Local Plan to create high quality places and successful communities and to optimise development, which is in line with the Council's Corporate Plan's aims to create thriving neighbourhoods, improve public health and wellbeing, making Enfield a safer place and developing a vibrant town centre.



Town centres as places

7.2.2 There is a need for our town centres to be successful as economic places or destinations in their own right, whilst promoting the overarching objective of delivering growth. This is measured by the degree of vitality as well as commercial spending and competitiveness (viability) in line with national and London-wide policy. Whilst there will be differing expectations in terms of the scale of growth in Enfield Town and our four district centres of Angel Edmonton, Edmonton Green, Palmers Green and Southgate, when compared to our local centres (large and small) the overarching ingredients of place quality for centres are applicable whatever the scale and function.

7.2.3 When evaluating the quality of place on offer in the borough's town centres at present using the standard 'health check' methodologies, the results of consumer survey and other engagement, as well as character analysis a number of weaknesses are identified that need attention to make our town centres more attractive and pleasant. These need to be combined with those aspects recognised as important by good practice guidance, whilst cross referencing to specifics of each town centre where most change is anticipated in the growth section of the new Local Plan.

7.2.4 A key factor, is ensuring people can easily reach the town centres and other town centres from the local area, and the point of arrival and public realm around the shops and services is convenient, attractive and easy to get around, accessible to whatever the person's ability, visually interesting, and safe by applying the healthy streets approach. This includes ensuring that large commercial uses do not have blank, inactive façades and frontages, or blocks which are out of scale that disrupt routes. Development therefore brings the opportunity to address past mistakes of this type. In addition to design quality, security features such as natural surveillance and the management of town centre specific characteristics such as crowding and aspects of night-time economy including the implications of alcohol consumption on behaviour and noise.

Mix of uses

- 7.2.5 The Council is aware that in the context of economic, demographics, retail supply and social changes, some centres will require substantial extra retail space and others will need to plan for a more static and in some cases possible decline in retail space. A key aim in relation to the town centre hierarchy is to ensure that there is sufficient capacity for new retail floorspace in line with identified need and that surplus capacity does not lie vacant. There is a need for a flexible approach to land uses in which a wide range of retailing, services and community activities are promoted as part of a healthy town centre mix.
- 7.2.6 Existing policies in the Core Strategy and Development Management Plan seeks to maintain a higher proportion of shop units (Use Class A1) in the primary shopping areas of Enfield Town, the district centres, and the local centres, regardless of whether they are large or small. The Council recognises that retail is important, with a variety of retail formats to incorporate a range of convenience and comparison, independent and multiple, large and small businesses, particularly in the larger centres such as Enfield Town, and the district centres. Together, these bring valued diversity that can add to local identity, whilst also allowing for changes to market circumstances over time.

- 7.2.7 However, retail uses alone do not provide for sufficient activation and usage to create fully vital and viable town centres in today’s market. Therefore, there is the importance of diversification both vertically above shops (mainly in the case of residential) and across the centre. This should draw in new customers who may undertake linked trips, extend activity into the evening, and generally encourage people to spend longer in a centre as more of their needs are met in one place.
- 7.2.8 In larger centres, such as Enfield Town and the four district centres provision for visitors from beyond the local area will also be important, including both visitor attractions (e.g. street markets) and facilities (e.g. public toilets, changing facilities and water fountains). The importance of quality leisure and cultural uses such as restaurants, bars, other performance space that contribute to the night time economy is particularly recognised. The proximity of the borough to Central London, offers opportunities for development of a local night time economy in the borough’s centres as part of London’s cultural offer – see draft policy approach TC4.
- 7.2.9 The interpretation of our guidelines, clusters or overall numbers of non-retail uses has proven unreasonably restrictive and has sometimes overshadowed the other considerations of the policy. Uses such as housing, offices, sport, schools or other social, commercial and cultural enterprises and meeting places can and will make an important contribution to the health and vibrancy of town centres, but do not fall within the remit of the A1 use class. Consequently, we need new policies to enable this to happen.

Figure 7.3: (far left and below)
Examples of mixed uses and active streetscene



7.2.10 The Council recognises that getting the right balance of uses including new homes in town centres is key to regeneration and growth, attracting investment, increasing trips and visits. Consequently, the Council proposes to remove the general guidelines for the proportion of A1 retail units within the primary and secondary shopping areas of Enfield Town, district centres, local centres and shopping parades whilst recognising the importance for flexibility to meet changing needs. Where proposals for town centre uses are located outside of a designated centre, the Council will expect the applicant to demonstrate a sequential approach to site selection, focusing uses firstly on the edge of designated town centres.



Town centre boundaries

7.2.11 In order to promote effective functioning of town centres and optimise access to shops and services, the London Plan requires boroughs to define town centre boundaries and Primary Shopping Areas where they wish to promote the retail function of the centre and therefore the greatest concentration of retail development, and Secondary Shopping Areas providing locations for a wider mix of retail and non-retail town centre uses. For the borough, Enfield Town is the only town centre with primary and secondary areas. Its retail function will always be important.

7.2.12 However, both the primary and secondary frontages need to be reviewed to allow Enfield Town to attract new offers and fulfil a greater function including a night time economy. The development of retail and other main town centre uses outside town centres can pose a threat to their vibrancy and needs to be carefully managed to ensure it does not have adverse impacts on them. The Council supports the 'town centre first' principle. Proposals for new and extended town centre uses located outside of town centres, will be required to provide a sequential test and an impact assessment.

Car parks

7.2.13 In Enfield, parking does not necessarily equate to spend. The Council wants to avoid over-provision of car parking where public transport, walking and cycling offer a practical means of accessing facilities and services. The areas with the highest public transport accessibility are in the borough's town centres.

Figure 7.4: Example of active streetscenes as seen in Covent Garden (top) and on Exhibition Road, South Kensington (bottom)



TC2 Draft policy approach: Successful town centres

The Council will ensure that the borough’s town centres are vibrant, vital and valued as components of neighbourhood and for Enfield as a whole, being successful in social and economic terms. Town Centres should act as community focused hubs and as destinations through their distinctive character, offer and connectivity to their surroundings.

We will work with the Mayor of London and other stakeholders, such as Business Improvement Districts, to enhance the vitality and viability of the borough’s hierarchy of town centres, including Enfield Town as the main town centre, four district centres, 18 large local centres, ten small local centres and 33 local parades (see Table 7.1 and Figure 7.1 for details).

We will achieve this by:

- a) Ensuring routes to and from local areas and local transport nodes and across the centre are convenient, attractive and feel safe, creating them or enhancing them where necessary;
- b) Encouraging high quality, accessible public realm and a series of features facilities such as water fountains, public toilets and changing facilities, and public spaces that complement the centre’s offer;
- c) Diversifying uses, encouraging innovation and flexibility, meanwhile uses (see draft policy approach TC3), a quality night-time economy (see draft policy approach TC4), visitor and cultural attractions and facilities so that uses can expand and/or change between uses classes, subject to demand and appropriate permissions/agreements;
- d) Promoting town centres as places for business and networking and supporting initiatives and enterprises that encourage this;

- e) Supporting the creation or redevelopment of used or underused space above or below ground floor units for residential accommodation in centres (subject to the requirements of other relevant policies) to add to their activity levels (see Part 2 of this draft policy, below);
- f) Seeking a mix of shop sizes and types, with independent as well as national traders that are accessible to local residents, workers and visitors; and
- g) Ensuring that new development for town centre uses are appropriately located, are of an acceptable scale, and do not negatively impact on the existing town centre hierarchy, in accordance with national and regional policy and local need.

Housing in town centres, above and below shops

The Council will promote the development of housing within Enfield’s centres, including above and below shops, where this does not prejudice the town centre function and particularly the ability of the ground floor to be used for town centre uses.

We will expect development proposals to provide appropriate attenuation measures in locations with high levels of noise, in line with the agent of change principle, to protect incompatible uses. Development will be resisted:

- In areas at risk of flooding, where housing at basement levels is proposed;
- In order to protect the retail and town centre uses the Council will only permit conversion of retail and other town centre uses to residential use where it does not harm the role and character of the centre, including maintaining the supply of shop premises in centres across the borough.

Other uses within town centres

The Council will support other town centre uses (in line with the NPPF) in our town centres and the upper floors provided they do not cause harm to the amenity of existing residents or introduce activity that would prejudice future residential use on other levels or in neighbouring properties.

We will expect development proposals to: Provide appropriate attenuation measures in locations with high levels of noise, in line with the agent of change principle to protect incompatible uses.

Surplus car parks

The Council will promote the development of a mixture of uses including housing within car parks of the borough's centres that are surplus to requirements because they are no longer suitable, underused or expensive to maintain where there is marketing evidence to suggest no demand, car parks may provide greater opportunities to introduce life back into town centres and promote a better use of available land to meet the borough's growth strategy.

Loss of existing shops

When considering planning applications involving the loss of existing shops outside designated town centres, the Council will take account of the following matters:

- Whether the loss of the existing shop would leave the area under-served by convenience retailing i.e. under-served areas are generally those where no alternative provision is available within a 400m walking distance;
- Whether there is a realistic prospect of a shop unit remaining viable in that location; and
- Whether the proposed alternative use is compatible with the surrounding area.

Managing Town Centres

We will promote a proactive and strategic approach to town centre improvement.

We will achieve this by:

- Optimising the Council's available resources to promote strong strategic and local partnership approaches, community engagement, better public realm, leisure/cultural activities and seek investment and suitable delivery partnerships to achieve its objectives;
- Encouraging the creation of a healthy part of London by supporting uses that have a positive impact on health and well-being;
- Reviewing the town centre boundaries to strengthen policies and delivery actions on creating and maintaining a safe, clean and attractive public realm;

Working with developers, retailers, businesses and other key stakeholders to:

- Enhance buildings;
- Respond to, and work positively with historic and natural assets;
- Promote safe, clean and attractive public spaces;
- Support improved transport/access;
- Respond to the needs of multi-channel retailing; and
- Support enhanced managements and partnership arrangements.

Ensuring the evening economy across the borough's town centres is well managed to create a safe, clean and vibrant leisure-oriented environment (see TC4).

7.3 Meanwhile uses

7.3.1 Meanwhile, interim or pop-up uses are uses introduced for a temporary period of time, which can play a valuable role in creating a sense of place. These uses can also play a major role in bringing empty shops back to use and allowing start-ups to trial their business model and explore their market. The value of meanwhile uses has been recognised across the property and regeneration industry, not least as a strategy for enabling early delivery of longer-term regeneration and development proposals. Meanwhile uses provide the opportunity for early wins by quickly bringing life and activity to an area, in some cases before permanent development begins and enabling a period of testing project ideas and establishing uses, recent examples include: Box Park Shoreditch, Artsworks in Elephant and Castle and Pop Brixton.

7.3.2 In line with the Council’s aims in the Corporate Plan to support vibrancy in our town centres and in our emerging growth and opportunity areas, the Council will encourage the provision of meanwhile uses to act as an attraction to draw people into an area. Such uses could include: culture, sports, leisure uses, education and health institutions. The provision of Central St Martins University of Arts at King’s Cross provides a good example of how such uses can help create a sense of place. The Council will work with partners, developers and providers to explore ways in which such uses can be attracted to help accelerate development and regeneration.

7.3.3 Small and medium sized meanwhile uses are an integral part of town centre uses and should be focused within the centres identified in the town centre hierarchy, or in areas of high footfall. Whilst large-scale meanwhile uses can play a more fundamental role in regeneration and growth, helping to create a destination and providing uses that serve a London-wide need as well as meeting local needs, such as at Meridian Water. Large-scale uses may have a significant land-take, with subsequent impacts on amenity and transport networks. They may also result in a need for greater flexibility in development densities to continue to achieve the homes and jobs targets identified.

7.3.4 Consequently, different large scale meanwhile uses will have different impacts on their surroundings and for such uses to be acceptable these would need to clearly demonstrate how they have successfully mitigated these impacts. The Council will be generally supportive of meanwhile uses. However, it will be important to ensure that any meanwhile use does not result in an unacceptable impact on residential amenity and that the uses do not prevent development sites from being brought forward for development in a timely fashion.

7.3.5 Through occupying temporary land, buildings or units, meanwhile uses can be low cost and low risk, making them attractive to business start-ups, community groups and the creative and cultural sectors. To support these, the Council will require developers to put in place appropriate mechanisms to support occupiers of meanwhile spaces to secure space within permanent structures. Further details on the requirements for this will be in the next stage of the new Local Plan.



TC3 Draft policy approach:
Meanwhile uses

The Council will support proposals for meanwhile uses, where they contribute to regeneration and enhance the character and vitality of the area.



Figure 7.8: BoXPark in Shoreditch, Hackney showing meanwhile uses acting as prototype of the character where a new or reformed piece of the city may develop.



7.4 Evening and night time economy

- 7.4.1 The NPPF requires local authorities to recognise town centres as the heart of their communities and pursue policies to support their viability and vitality. The London Plan requires local planning authorities in their Local Plans to minimise the impact of night time economy uses on other land uses.
- 7.4.2 Evening and night-time economy uses comprise a wide range of uses including A3 restaurants, A4 drinking establishments, A5 hot food takeaways, D2 uses such as theatres, music venues and cinemas. Public houses also play a valuable role in the evening and night-time economy, and they can also fulfil an important social and community function.
- 7.4.3 The night-time economy is worth £26.3 billion a year to the London economy and is part of the reason that London is an attractive place to live, work and visit. The Mayor’s Culture and Night Time Economy Supplementary Planning Guidance (SPG) (2017) identifies that opportunities should be taken to extend the opening hours of activities and uses. For example, this could include more traditional night time economy uses such as eating and drinking establishment, alongside uses usually associated with the day time, such as shops, cafes, recreational, community and leisure facilities, helping to create a ‘bridge’ between day time and night time economy uses.
- 7.4.4 A high-quality night-time economy offer contributes to the local economy by attracting visitors to the borough, sustaining local businesses and providing local jobs. However, for Enfield, specifically Enfield Town (the borough’s only major town centre in the London Plan hierarchy) is not identified as having a night time economy in the draft London Plan. However, the Council wishes to encourage this activity and further opportunities to enhance the night time economy especially in the town centres and emerging growth and opportunity areas as set out in Chapter 2 as part of mixed use developments.
- 7.4.5 For Enfield Town, the Masterplan (adopted in February 2018) provides a framework to make better use of Market Place to encourage evening economy activity, which could be activated by pop-ups such as an open-air cinema, or seasonal festive events during the year. This would support strengthening of Enfield Town’s evening economy and retail and leisure offer, whilst also respecting and enhancing its market town characteristics, making Market Place a focal point within the centre.
- 7.4.6 With Meridian Water envisaged to be a new neighbourhood, the Council will encourage uses such as events space, restaurants and leisure activities which provide opportunities for people to enjoy and socialise in the evening and night time.
- 7.4.7 In line with the Council’s Corporate Plan to develop safe communities, we will encourage activities such as restaurants, cafés and bars, cinemas and theatres, adding variety and vitality to town centres and places, and together with facilities in local centres, providing services for the local community and visitors to the borough. In addition, these uses can provide important employment and economic development opportunities for the community and shoppers, who are increasingly seeking an extra dimension to shopping trips, whilst also creating more opportunities for employment. Increasing the importance of having a strong entertainment and cultural offer in town centre are often a proven draw for users of town centres and can add

Figure 7.9: Promoting night time and evening economy through different uses such as open air cinema, as seen in Amsterdam



significant footfall and vibrancy to an area.

economy and high quality residential environment.

7.4.8 However, some of the uses and activities associated with this economy can, if not properly managed, detract from creating a high quality residential environment. In particular, the traffic and car parking generated, particularly in the evening and anti-social behaviour associated with some licensed premises, which can cause problems for local residents. Another matter is the appearance of ventilation ducts, noise and smell generated by restaurants, can also be a major problem, particularly in conservation areas, or where they are in close proximity to residential areas.

7.4.11 In order to manage the impact on residential amenity, the Council will need to control the scale and nature of new proposals, including how premises are managed, notably through regulation of opening and closing times. In addition, because of the impact that some uses may have on amenity, the use of planning conditions may be applied to control hours of early morning opening.

7.4.9 The Council will work with applicants to support the delivery of a vibrant evening and night-time and will look to apply the 'agent of change' principle to appropriately manage the impacts of late night premises. When a town centre use is the 'agent of change', proposals for late licences will be assessed in terms of the use's impact on residential amenity. There will also be consideration on issues such as noise within the premises, smells, light pollution and the impact of those going to and from the facility, such as traffic, car parking and anti-social behaviour.

7.4.12 Flexibility and exceptions to opening times may be possible. In this respect, the Council will consider a number of factors, including:

- The type of use and the number of customers likely to attend;
- The proposed hours of operation;
- The level of public transport accessibility for customers either arriving or leaving the premises and the likely means of public or private transport that will be used by its customers; and
- The means of access to premises, the level of car parking demand on surrounding streets and the cumulative impact of uses in the area, and the scope for mitigating any impact.

7.4.10 Conversely, under 'agent of change' principles, if a town centre use is in place before a residential development, as the 'agent of change', the residential development is responsible for militating against potential residents' complaints, licensing restrictions or the threat of closure. Residential uses within or close to town centre locations, where there is potential for late night activities, should carefully consider the locations of habitable rooms and in particular bedrooms. They should also clearly demonstrate how noise attenuation measures have been included and designed to the highest standards. This approach is necessary to ensure both a vibrant night-time

7.4.13 The Council works closely with the police, the fire authority, local businesses, community representatives and local people in meeting these objectives. The licensing policy recognises that certain types of licensed premises can lead to an increase in anti-social behaviour and the draft policy is designed to assist in prevention of crime and disorder in safeguarding public safety, in the prevention of public nuisance and in the protection of children from harm.

7.4.14 Where premises do not require planning permission or already have consent, it will not be possible to control hours of operation through the planning process. Through town centre management initiatives, the Council will ensure that the night time economy is managed in a way that benefits residents, visitors and businesses.

TC4 Draft policy approach: Evening and night time economy

Evening and night time economy uses including: food and drink establishments, cinemas and theatres will be directed within the defined town centre hierarchy and emerging growth and opportunity areas as defined (chapter 2).

The Council will expect development proposals involving use classes A3, A4 and A5 food and drink establishments as well as arts, culture and leisure uses to demonstrate that they promote a safe and high-quality environment for all and will be subject to conditions controlling hours of operation to minimise their impact on residential amenity.

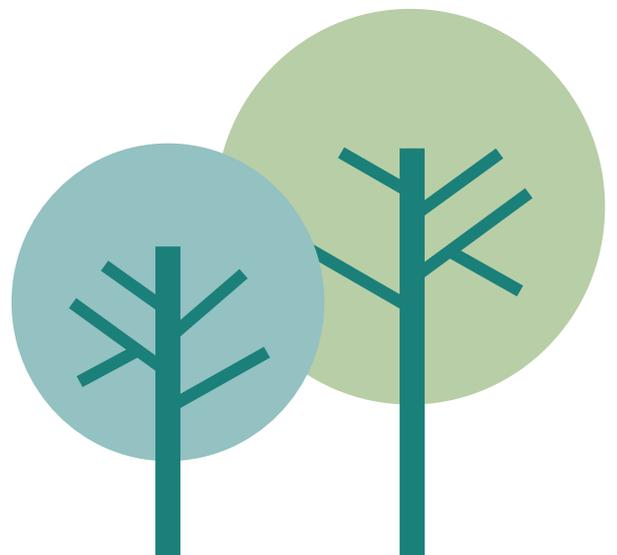
Development proposals would need to demonstrate that:

- There would be no detrimental harm to the amenity of the neighbours resulting from the use itself or from those travelling to and from the facility;
- The proposal would not result in harmful cumulative impacts in association with other late licenced properties;
- Where there are proposals for new residential properties and they are located within mixed use schemes or in close proximity to established or planned uses with late night licences, the proposed residential use will need to demonstrate that it is capable of mitigating against the impact of established or planned use such that the amenity of the future residents is protected.

Enfield Town

The Council will work with partners to establish an improved way-finding strategy to points of interest for evening visitors. The Council will support:

- The clustering of food and drink uses along London Road through the relaxation of planning policy to allow shops (A1) to be used as hospitality venues;
- Improvements to the green spaces to the west of Church Street/Windmill Hill and the entrances to the town centre to attract food and drink suppliers encouraging people to visit and stay, adding to the vibrancy of an area;
- The use of empty shop units as permanent community use hubs to develop culture, entertainment and community involvement initiatives; and
- Enhance the market offer and multi-functioning space at Market Place for evening-based activities.





8 Community and social infrastructure

8.1	Community facilities	145
8.2	Health and wellbeing	153
8.3	Arts, cultural, entertainment, recreation, sport and leisure facilities	156

The provision of a **variety of community infrastructure and cultural facilities** are vital in improving the quality of life of residents, workers and visitors

Growth is supported, but existing sustainable cultural and community facilities should be protected

Recognise, protect and support community and cultural facilities

Health and education should be prioritised

Improve safety and reduce fear of crime

Promote new facilities to support the growing population

Support the **multiple use** of community facilities including schools, libraries and meeting places

Promote culture and arts and recognise the importance of cultural facilities

Create **healthy environments and build stronger communities** and foster social capital

Promote **sustainable communities, community cohesion** and enhancement of existing urban areas

What respondents said about social and community infrastructure as part of the 2015 Consultation and Enfield Conversation



8 Community and social infrastructure

8.1 Community facilities

8.1.1 Community facilities are defined for the purposes of this section of the Plan as education (from pre-school to further and higher education) and training, health, social, leisure, children’s playspace, playing pitches including MUGAs and associated facilities, places of worship, burial spaces, community spaces including pubs, cultural and civic uses, police and emergency services. These facilities form a vital part of town centres and neighbourhoods and address the community needs. However, it is acknowledged that some facilities offer large scale or specialist provision, in some cases for a specific community and serve a wider catchment.

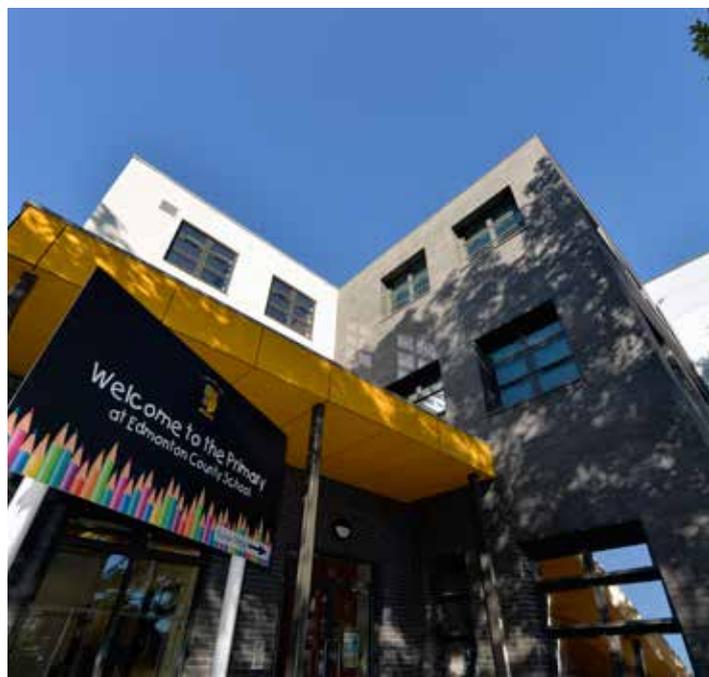
8.1.2 Achieving good growth and an active and connected community is about ensuring that residents and businesses have the local infrastructure and services they need, which gives them choice about how they access services to maintain and improve quality of life.

8.1.3 Through the preparation of the new Local Plan, the Council will be undertaking a social infrastructure needs assessment to inform an update to its Infrastructure Delivery Plan (IDP). The IDP provides the basis for ongoing coordination with the Council’s service areas and other infrastructure delivery agencies to plan positively for the existing and future provision of new community infrastructure to meet the timing and location of community infrastructure needs. This is in line with the approach set out in the NPPG, which states that: ‘local planning authorities should work with other authorities and providers to assess the quality and capacity of a range of infrastructure types and its ability to meet forecast demands and take account of the need for strategic infrastructure within the authority’s area.’

8.1.4 The forthcoming social infrastructure needs assessment will need to assess the demand for planned provision of a range of infrastructure types including: education facilities, health facilities, transport, community halls, open space, sports and leisure facilities, libraries, police and emergency services, energy, waste and flood infrastructure – this piece of work will inform the planning policies in the new Local Plan by taking an inclusive approach allowing the population to participate. These are essential components of the community facility network and will be prioritised in order to ensure the needs of the borough are met. These, and other community facilities needs for provision to expand, be newly provided, or in some cases be reconfigured/ oriented will be reflected in the next version of the Local Plan where need in the plan period and scope i.e. for development/intensification is known. Key facilities for the borough are: new education, healthcare and flexible community facilities many of which provide an element of childcare.

8.1.5 For the foreseeable future, many of our community facilities are expected to experience reductions in funding, increased levels of demand and rising expectations. The long-term sustainability of these facilities is a particular concern. Through good planning, the Council will encourage disposal and redevelopment of land and buildings back into new and updated community facilities.

Figure 8.1: Edmonton County School, as part of the Schools’ Expansion Programme



8.1.6 Equally, to ensure that community facilities make the most effective use of land, a key component of policy is to ensure that facilities meet an identified local need. This is relevant to both the assessment of proposed new facilities and elsewhere, as well as the assessment of the appropriateness of loss of land/premises with lawful community facility use. In this respect, the Council will consider the careful location and design and management to ensure facilities will continue to meet, potentially changing need over time, and preferably meet a range of needs at any one time, whilst being inclusive, accessible, welcoming and flexible.

8.1.7 Increasingly, complementary services are managed by a variety of different providers and are being brought together within the same site and building, thereby improving accessibility, the user experience, and helping to realise savings and efficiencies. These moves towards shared services and greater collaboration both within the public and local community sector means that the Council and other commissioners and providers will therefore need to carefully consider the use of its existing assets and work together with its partners, including the private and voluntary sector to deliver services with effective use of land and buildings.

8.1.8 Through this approach, the Council will support the co-location of facilities and services alongside other policy compliant uses, such as housing, which can also be land use efficient and be beneficial for the viability of a facility, whilst enhancing overall security. Given the need to make our land work harder and the constrained nature of some sites, the draft policy approach also promotes the use of innovative solutions including meanwhile provision to enable redevelopment of an existing site. Other innovative solutions could include the use of shared facilities or multi-storey provision, such as roof top playgrounds, or in some cases off-site shared provision of playing pitches and other facilities.

8.1.9 Town centres and areas with good accessibility, are prioritised for location of community facilities helping to promote access to services across the borough in accordance with the wider vision. Whilst the locational preference for community facilities continues to follow a town centre first approach, the policy approach recognise circumstances where there is the potential and logical justification in light of other policy objectives and recognised delivery realities for the location of community facilities elsewhere in the borough, subject to careful management of impacts.

Figure 8.2: Edmonton Clinic



Figure 8.3: Children taking part in the regeneration of Crescent Edmonton



Meeting the need for community infrastructure

8.1.10 It is important that the growth in Enfield’s population does not place unacceptable pressure on existing community facilities, whilst ensuring there is sufficient provision to support new developments. It is also recognised that some community facilities serve a catchment extending outside of the borough boundary and the needs of residents in adjoining boroughs will be taken into account.

8.1.11 The Council will seek Section 106 planning obligations, where it is appropriate to do so, to ensure that the additional demand a development places on existing community infrastructure and services is met. When we use Section 106 agreements, we will take into account viability as a factor in determining the types of facilities or services that are required and the time-frame in which these can be delivered. The Council will also not seek contributions for community infrastructure and services from small scale and self-build developments in line with the circumstances set out in the National Planning Practice Guidance. The Council will use strategies relating to the accommodation requirements of the public and voluntary sectors when establishing the need and local priorities for community infrastructure identified through this consultation.

Ensuring facilities are accessible for their users

8.1.12 The Council will also assess the potential accessibility of a new or extended facility for its intended users. Where a facility is anticipated to generate a large number of trips, we would expect it to be provided in our town centres and areas around our key stations. To help sustain community facilities and improve accessibility for our residents, we will expect opportunities to be fully assessed to co-locate different service or activities from one site or premises. The Council will also seek opportunities to improve access to facilities through agreements allowing the shared use of a facility by the wider community or increased hours of community access where this is practicable. This approach provides a cost-effective and sometimes the only viable means of addressing deficiencies in provision and reduces the need to travel.

Schools and colleges

8.1.13 As part of the Council’s statutory duty to ensure there are sufficient places within the borough, Enfield’s School Expansion Programme assesses the demand for school places and sets the plan for meeting future identified needs in the borough. This takes into account the current capacity of schools, the projected future demand for places, variations in demand across Enfield, housing developments and proposed changes in other boroughs. Capacity from year-to-year can fluctuate rapidly due to factors such as parental choice and housing developments. In line with the growth anticipated, the assessment will be updated to determine the identified need.

Figure 8.4: George Spicer Primary School, Southbury Road



Open space, sports and leisure facilities, community hall and libraries

- 8.1.14 Ensuring access to other types of community facilities such as: open space; sports and leisure facilities; community hall; and libraries, will also be necessary. This will need to be achieved through a combination of new facilities and protecting and improving access to existing facilities where these are fit for purpose and in locations that are appropriate to meeting demand.
- 8.1.15 Enfield's libraries are a valuable resource that should be at the heart of local communities. As essential community facilities, they are capable of aligning themselves with other community service providers across the borough. As a library authority Enfield is under a statutory duty to provide library services for everyone. Enfield currently dispenses library services from 17 service points across the borough. This is the greatest provision of library services when compared with all other London authorities.
- 8.1.16 The Library Development Strategy has sought to streamline Council services in order to make savings, while simultaneously seeking ways to improve library and Council services. This strategy is in its third year of operation and while most of the strategy has already taken shape some elements are still in the process of implementation. The strategy has designated existing libraries as either Flagship or Community Libraries. Community libraries share the facility with other service providers, organisations or voluntary groups. These types of libraries are run by community organisations on behalf of the Council.

Figure 8.5: Ordnance Utility Centre



Supporting the community

- 8.1.17 Enfield has many meeting places, churches, community facilities and centres that cater for a range of faiths and beliefs. It is expected that further provision will be required to meet the needs of faith communities through the plan period. In line with the growth anticipated, we will undertake a social infrastructure assessment to determine the identified need.
- 8.1.18 The Council welcomes investment by faith communities to develop new space to meet or worship, subject to other policies in the Local Plan. The Council will also encourage faith communities to consider sharing facilities where one community has spare capacity, and another has a need for space.
- 8.1.19 Children's Centres provide opportunities for families with children under 5 to learn and develop. Their core purpose is to improve the outcomes for young children and their families and reduce inequalities across the borough. Children's Centres play an important role in:
- Child development and school readiness;
 - Parenting aspirations and parenting skills; and
 - Child and family health and life chances.
- 8.1.20 Enfield currently has 20 children's centres distributed across five child reach hubs providing different types of support and activities in response to the direct needs of the local community in which they operate.
- 8.1.21 The Council, through its website provides a database of spaces that can be hired and used by community and voluntary organisations who are able to deliver a wide ranging and varied number of activities and services. This database is currently comprised of 114 registered sites which provide in the region of 450 halls and rooms for hire. Eight of these sites are community centres. The types of activity run from these facilities is broad and ranges from social networking to keeping fit and language classes.

Police and emergency Services

- 8.1.22 The Council will continue to work in partnership with emergency service providers to enable the effective delivery of their services across the borough and wider area. The Local Plan will reflect the strategic ambitions of all emergency services to this effect. In the determination of planning applications, the Council will consult with the emergency services where this is applicable and appropriate and on larger, more complex proposals will involve them at the pre-application stage.
- 8.1.23 A Safer City for All Londoners is the Mayor's Police and Crime Plan (MOPAC) for the period 2017-2021. The plan seeks to restore neighbourhood policing, putting Dedicated Ward Officers (DWOs) and PCSOs back at the heart of the community. By December 2017 the plan aimed for each ward in London to have at least two dedicated Police Constables and one PCSO.
- 8.1.24 There are currently two operational ambulance stations in Enfield. These are located at Edmonton and Ponders End. New national ambulance standards have been implemented following one of the largest clinical ambulance trials in the world. Changes to the standards attempt to focus on ensuring the most appropriate response is provided for each patient first time. Call handlers will now be allowed more time to assess 999 calls that are not immediately life-threatening, enabling them to identify patients' needs better.
- 8.1.25 Enfield's Fire Brigade resources are distributed at three locations across the borough at: Southgate, Edmonton and Enfield Fire Stations. The Fire Service's emergency cover is planned for using a risk-based approach. The Brigade plans its services to respond to every situation so that it can send the right number of trained firefighters with the right type of equipment to resolve the incident in the most effective way, and with the least risk to Londoner's lives and property.
- 8.1.26 The London Fire Brigade has effective measures in place for dealing with incidents in high-rise buildings and includes a predetermined attendance of four fire engines to any high-rise incident. Following the Grenfell Tower incident, it is likely that the current approach to fire safety in tall buildings will be reviewed and the Local Plan will take this into account. The Council is updating its Infrastructure Delivery Plan (IDP) and will conduct a needs assessment for a range of social infrastructure to assess existing and planned future provision, using information from key service providers such as the Clinical Commissioning Group, Emergency Services and other Council departments among others. The Council will work with the relevant social infrastructure providers and the voluntary and community sector to ensure the adequate provision and enhancement of services and facilities are able to meet the existing and changing needs of Enfield's community. The Council will also ensure that planning policies are robust but also flexible enough to respond quickly to the often rapidly changing needs identified and will regularly update the IDP to that effect.
- 8.1.27 The Council will work with the appropriate stakeholders to identify appropriate areas for new social infrastructure to meet identified needs. It will also work with them to encourage the provision and design of flexible and multi-use community facilities that can accommodate a range of needs, where appropriate.
- 8.1.28 In light of the changing nature of town centres the Local Plan will seek to provide policies that promote and prioritise the delivery of new social infrastructure within town centres through co-location and mixed-use developments where this is appropriate (see Chapter 7). This will provide opportunities to protect existing social infrastructure through re-provision while making the most efficient use of space, accessibility and improving the overall viability of schemes.



SI1 Draft policy approach: Social and community infrastructure

The Council will work with its partners to ensure that community facilities and services are developed and modernised to meet the changing needs of our community and reflect the new approaches to the delivery of services.

We will achieve this by:

- a)** Supporting the quality of life of Enfield's residents through appropriate provision and retention of a range of community facilities to meet existing and forecast demand. Provision includes: education and training, health, social, leisure, children's playspace, playing pitches including MUGAs and associated facilities, places of worship, burial spaces, community spaces including pubs, cultural and civic uses and provision related to community safety such as police and emergency services;
- b)** Ensuring development is supported by appropriate community facilities to meet local needs;
- c)** Coordinating internal services and work with external agencies to ensure that the delivery and retention of community facilities is carefully managed to align provision with the needs of existing and new communities in the borough;
- d)** Supporting the investment plans of educational, health, and research bodies to expand and enhance their operations having regard to the social and economic benefits they generate for Enfield, London and the wider area. In assessing proposals, the Council will also balance the impact proposals may have on residential amenity and transport infrastructure; and
- e)** Seeking planning obligations to secure new and improved community facilities to mitigate the impacts of developments;

New and replacement community facilities

The Council will support new growth with appropriate community infrastructure in a timely and efficient manner by:

- f)** Retaining or re-providing community facilities where a local need exists and can be clearly demonstrated;
- g)** Prioritising the provision of health, childcare and education facilities where an element of community floorspace is proposed;
- h)** Ensuring all community facilities are located in places that are or will be accessible by a range of means of transport, including walking and cycling fostering community integration;
- i)** Prioritising town centres for the development of community facilities, where compatible with other policies in the Local Plan, but allowing exceptions to this, subject to the satisfaction of the criteria below:
 - The proposal does not result in a loss of housing as per H1 or designated employment land E2 and are otherwise compliant with other policies;
 - The proposal is meeting a localised need; and
 - The proposal will be adding to existing facilities to help form a recognisable 'hub' or 'cluster' meeting localised needs.
- j)** Supporting community facilities above ground floor units in our town centres, provided they are accessible to residents with disabilities;
- k)** Supporting co-locating facilities and services, and encouraging mixed use formats incorporating new or enhanced community facilities and other compatible and policy compliant uses, notably housing to help support viability, security and efficient land use, except for facilities occupied by the

emergency services due to their distinct operating needs;

- l) Promoting innovative ways of addressing constrained sites such as the use of shared facilities, meanwhile provision, off-site and multi-storey provision; and maximising use of buildings in evenings and at weekends; and

All new community facilities should be accessible, welcoming, inclusive and open and available to all members of the local community with sufficient capacity and flexibility to meet a range of local needs.

We will expect development proposals to:

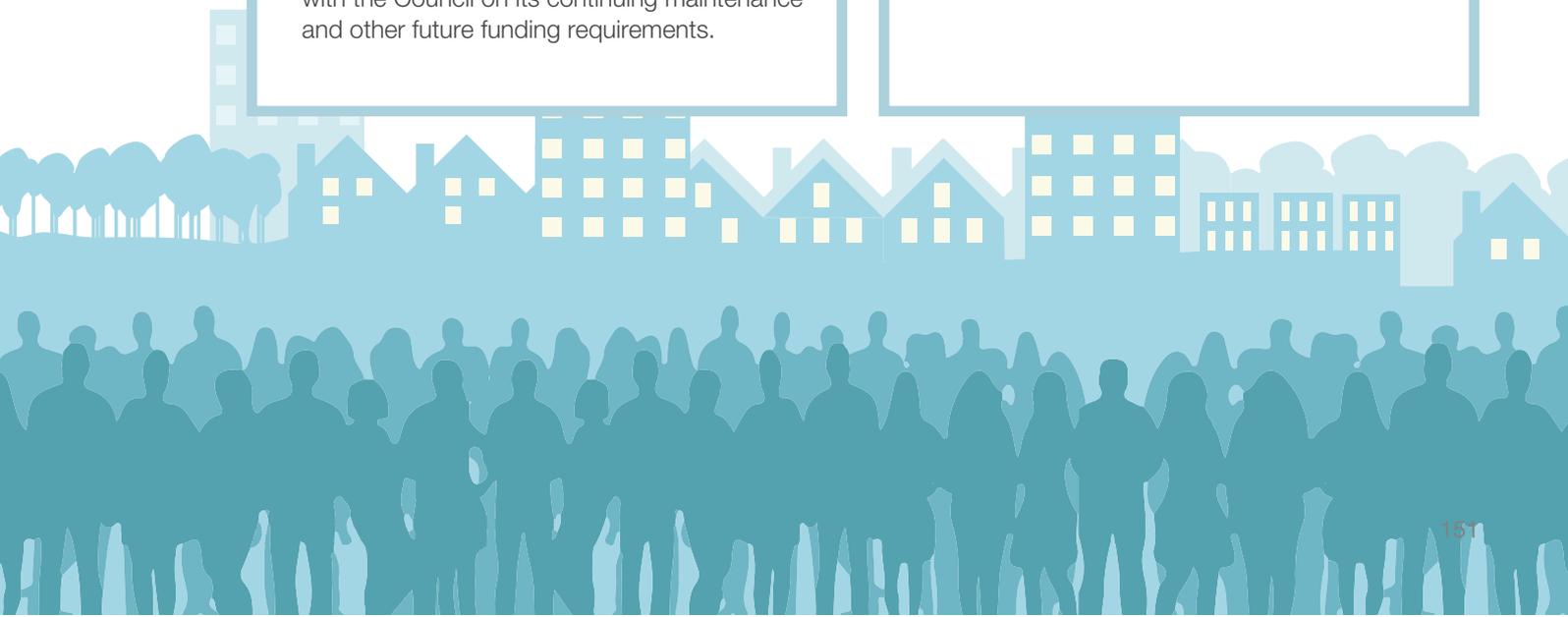
- Be outwardly looking, address the street and neighbourhood in their design so that they are welcoming within the urban area, subject to design and character considerations;
- Operate as a multifunctional space with fair and affordable access to all members of the community; and
- Demonstrate that they take account of other public infrastructure providers’/commissioners’ needs and scope for co-location.

We will expect a developer proposing additional floorspace in community use, or a new community facility, to reach agreement with the Council on its continuing maintenance and other future funding requirements.

Proposals involving the loss of community infrastructure

Where the release of a community facility building or site to other uses is proposed, evidence must be provided that the facility has been either:

- Assessed and identified as surplus as part of a wider strategic approach that is considered to be of local benefit, i.e. aligned with other Local Plan objectives, and having first drawn it to the attention of public providers and offered it to them, see below; or
- Offered to the market for the range of existing lawful uses, typically Class D1 for a period of 12 months, at a market rent or sale price benchmarked against other equivalent properties in the area. This will include drawing it to the attention of public providers and allowing for a mixed use where it can be marketed for a replacement facility with other policy compliant uses, such as affordable housing; or
- Shown to be unsuitable in size and scale for its location which has good access to facilities which meet similar local needs where these arise.



8.2 Health and wellbeing

- 8.2.1 Improving public health and well-being is one of the main priorities identified in the Council's Corporate Plan (2018-2022), as well as national and London-wide planning policies, which recognise the inter-relationship with socio-economic and environmental factors. Enfield's Joint Strategic Needs Assessment (JSNA) underpins the borough's Joint Health and Wellbeing Strategy (JHWS) setting out the borough's health priorities over a five year period to effectively deliver the NHS Five Year Forward View.
- 8.2.2 In Enfield there is a great variation in life expectancy between wards, with a sharp divide between the east and west of the borough. Men born in Cockfosters between 2010-14, for example, are expected to live on average seven years longer than men born in Upper Edmonton and women born in Highlands or Grange between 2010-14 are expected to live on average eight years longer than women born in Upper Edmonton.
- 8.2.3 In the 2016/17 academic year, 24.8% of reception children and 41.5% of Year 6 children in Enfield were identified as being overweight or obese. For the same period 11.4% of reception children and 23.2% of Year 6 children were classified as obese.
- 8.2.4 Enfield has a wide range of health facilities with 45 GP practice contracts, who work jointly, 2 hospitals, 44 dental practices, 59 pharmacies and 26 registered opticians. In terms of GP practice contracts there are 13 practices in the north east, 16 practices in the south east and 19 in the west who work jointly. It is understood that while these services are able to meet the demands of the borough's population as a whole they are not effectively distributed to meet needs in some areas.
- 8.2.5 There is an urgent need to improve people's diets and physical activity rates, reduce stress levels, exposure to environmental pollutants and ensure that everyone can enjoy opportunities on offer, whatever their ability.
- 8.2.6 Good growth and optimising development in accordance with the overarching objectives of the Plan, can play a crucial role in addressing these issues and we have an opportunity in terms of development land potential in the borough, enabling the principles of healthy neighbourhoods to be incorporated in new neighbourhoods right from the start with a shift towards cleaner and greener industries and logistics, and getting more people into work - all of these moves have a crucial link to ill health. Whilst at the same time, it is vitally important to improve existing neighbourhoods where much of the population will continue to live, as these are progressively re-shaped over time.
- 8.2.7 Across the borough, the number of hot food takeaways and relatively poor availability of healthy food remains a cause of significant public concern, with key links made with children's and adult health, as well as wider amenity issues. Currently, planning has come forward as an important agent in tackling the number of hot food takeaways in the borough. For example, by managing their spatial distribution thereby minimising their impact on public health.
- 8.2.8 Young people's access to such food, and the dietary patterns with health consequences established at a young age are an acknowledged concern at the national level. Conversely, through positive planning and good growth for local and inclusive accessibility, such as access to quality facilities and amenities will help improve physical activity. In addition, access to nature, healthy food, healthcare, can increase the likelihood of people benefiting from such facilities resulting in direct and indirect health benefits, reducing psychological barriers to access. At the same time, increasing the likelihood of the use of such facilities thereby contributing to fitness improvements, and addressing people's work/life balance reducing the time needed to access essential goods and services.

8.2.9 Historically, the relatively poor-quality housing, or management or unmitigated local environments which they have resulted in becoming so, coupled with poor design or wider neighbourhoods, have also had impacts on public health. Housing quality is known to have direct and indirect effects on physical and mental health and well-being through impacts on temperature, exposure to mould and pollutants, security, ability to meet changing household needs, and the ability to provide stress alleviation i.e. spaces of retreat and safety. Therefore, appropriate housing mix, including specialist housing, a range of sizes and tenures will also be important to address contributors to health.

8.2.10 Amongst the most significant influences on population health is the built environment, which is intrinsically linked to our opportunities for an active and healthy lifestyle. Safe, accessible environments conducive to walking and cycling are more likely to encourage physical activity. Social spaces designed into streets and buildings allow individuals to meet and interact with their communities. Fresh food outlets encourage healthy eating. Parks and open spaces give children the places required to run, play sports, and interact with each other. Therefore, this new draft policy approach has an important role in achieving the overarching priorities of: reducing health inequalities, embedding health in all policies and using community assets through promoting good growth and spatial planning, supporting healthier lifestyles and environmental improvements, as well as ensuring appropriate access to health facilities making the healthy choice an easy choice.

8.2.11 Policies in Enfield's new Local Plan will secure a local environment which promotes physical activity, improves access to healthier food choices, reduces isolation and social exclusion, offers quality housing, sustainable employment, access to services and the creation of healthy environments through new development. The new Local Plan will follow and promote the Mayor's Healthy Streets approach, which will contribute to the health and wellbeing of Enfield's community and the wider populations. This approach will be supported by This will be supported by the Council's Walking and Cycling with Healthy Streets Action Plan

Figure 8.9: (far right) North Middlesex University Hospital (left) The Qube in Ponders End





SI2 Draft policy approach: Health and wellbeing

The Council will promote healthy lifestyles, reduce health inequalities and create healthier neighbourhoods. We will support efforts to promote healthy lifestyles and reduce health inequalities, by recognising the role of planning in doing so through the creation of healthy neighbourhoods and places.

We will expect development proposals to respond to the following contributors to health and wellbeing:

- a) The need to apply the ‘Health in All Policies Approach’ in determining planning applications;
- b) The need to promote healthy eating;
- c) The need to improve Enfield’s air quality, reduce exposure to airborne pollutants, having regard to national and international obligations – see Chapter 11: Sustainable Infrastructure;
- d) The need to improve employment levels and reduce poverty having regard to the environmental impacts of economic development including community/public safety, noise and vibration;
- e) The need to improve housing quality, reduce crime, insecurity and stress, and improve inclusion through better urban design and housing mix as per draft policy approaches D1-4 and H4;
- f) The need for new or improved health facilities (see draft policy approach: SI1) and recognising the importance of protection and promotion of local access to health and other community facilities and employment, in line with relevant policies in the Plan;
- g) The importance of facilitating and promoting walking and cycling to increase people’s activity rates as per draft policy approach: T3;

- h) The need for new or improved, or access to inclusive open space and sports facilities, including good quality, secure play space and informal recreation provision for young people, access to food growing and accessible green and blue spaces to encourage greater participation in physical activity and provide relief from the urban environment; and
- i) The role of the NHS Hospital Trust as a key provider of clinical care and expertise, employment and training provision.

We will expect:

- Major development proposals to be accompanied by a health impact assessment (HIA), detailing how they respond to the above contributors to health and wellbeing, including details of ongoing management or mitigation of issues where necessary; and
- Minor developments will be required to identify potential impacts on health and wellbeing and demonstrate how these will be addressed through a Design and Access Statement.

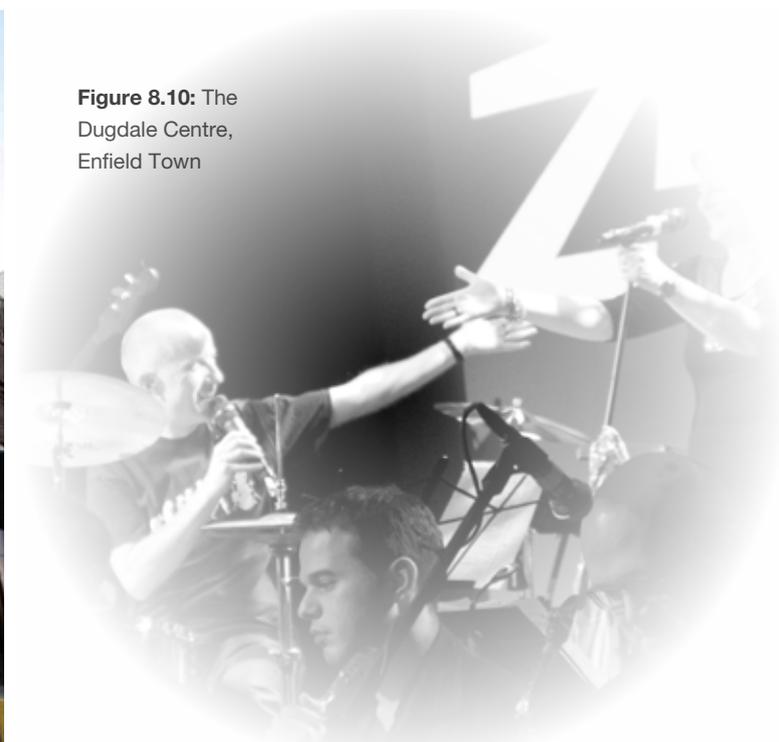


8.3 Arts, cultural, entertainment, recreation, sport and leisure facilities

- 8.3.1 Accessible arts, cultural, entertainment, recreation, sports and leisure facilities are important elements of social infrastructure and contributions to placemaking, helping to contribute greatly to the quality of life of all members of the community, as well as visitors to the borough acting as catalysts, by attracting visitors to an area, thereby increasing vibrancy and activity. Such facilities are particularly important elements of town centres and will be essential in supporting the borough's growth, as identified in Chapter 2.
- 8.3.2 The venues typically occupied by these uses vary greatly from purpose-built accommodation/premises to conversions from other uses. There are also events that are curated by the major cultural groups in the borough including the Turkish/Kurdish, African and Caribbean populations showing a commitment to the diversity of the population across the borough. These events are often open or run during the evening and at night time, for example Millfield Theatre, and along with uses such as restaurants and pubs and bars, help sustain a night time economy, which is particularly vibrant in the town centres. However, because such uses can also impact on residential amenity, for example with people coming and going, it is necessary for new or expanded venues to be appropriately located and managed.
- 8.3.3 Enfield is currently home to four theatres, two dedicated cinemas and four museums. A new museum is planned to open at Trent Park in 2020/21. This museum will be developed across the restored stately rooms on the ground floor of the Grade II Listed mansion house at Trent Park. There are currently no dedicated art galleries in the borough, however there is exhibition space at the Dugdale Centre.
- 8.3.4 In 2014 there were over 386,000 attendances for performances held at both Millfield Theatre and The Dugdale Centre. For the same year there were 308,000 attendances by children and young people taking part in positive activities at Millfield Arts Centre in Edmonton. It is the Council's ambition to continue to make leisure and cultural activities an important and valued part of life for Enfield's residents and visitors and aims to enhance these wherever possible. Out of town development which was fashionable in the recent past, has resulted in both of Enfield's cinemas being located outside of the town centres. Similarly, all of Enfield's museums and theatres lie outside the town centres.



Figure 8.10: The Dugdale Centre, Enfield Town



- 8.3.5 Despite the presence of a varied range of arts, cultural, entertainment, leisure, recreation and sports facilities, there are some parts of the borough that are not well served by such uses. It is therefore important to try to reduce these deficiencies. First and foremost, these facilities must be protected. Consequently, the Council will require adequate justification for any proposals for change of use or redevelopment of accommodation/premises to other uses. The proposed loss of buildings and/or land that are used for arts, culture, entertainment, leisure, recreation and sports uses will be considered against criteria such as the suitability and viability of the site or premises for such uses with or without adaptation, evidence of unsuccessful marketing and evidence of need.
- 8.3.6 To address the deficiencies in provision, when regeneration schemes come forward, the Council will seek to ensure that these are accompanied by arts, cultural, entertainment, leisure, recreation and sports uses that are appropriate to the scale and location of the development and are accessible and affordable and meet the needs of the community. As technologies have developed, a far greater range of services are now capable of being delivered online resulting in lower numbers of planning applications for retail uses in our town centres and high streets, with units remaining vacant. This presents opportunities for a broader and more diverse range of town centre uses, including arts and cultural uses to be introduced into the borough's town centres making them the hubs of local life. The temporary use of buildings for example, may offer the opportunity for community uses, particularly those that are transient or may have a short life, thereby helping to enliven town centres, where vacancy is an issue.



SI3 Draft policy approach: Arts and cultural facilities

The Council will support the enhancement of arts, cultural, entertainment, leisure and sport uses.

We will achieve this by:

- a) Supporting the continued presence of Enfield's arts, culture, entertainment, leisure, recreation and sports venues subject to the local impact of venues being managed without added impact to local residents;
- b) Requiring proposals for new and expanded venues to be accessible and inclusive and to be supported by evidence of how impacts such as noise, traffic, parking and opening hours have been assessed, minimised and mitigated;
- c) Seeking retention, replacement or enhancement of existing arts, cultural, entertainment, leisure, recreation and sport uses, unless there is evidence that there is no longer an identified need for a particular facility or alternative arts, cultural, entertainment, leisure, recreation and sport uses. In these circumstances, the Council will require evidence demonstrating that the facility is not economically viable, including evidence of active and appropriate marketing for a continuous period of at least 12 months; and
- d) Supporting the temporary use of vacant buildings for community use including for performance and creative work.



9 Enfield's green and blue spaces

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Proposals for sustainable growth should take full account of the **Lee Valley Regional Park** and the benefits it brings to the borough

Green Belt and open spaces should be protected in the first instance

Any loss of sports provision should be justified and considered through the plan making process

The opportunity to rationalise employment land along the Lee Valley corridor is supported, provided that areas of open space are protected and improved

Opportunities to soften and naturalise river banks and improve flood defences should be explored and is a requirement/consideration of any riverside development

What respondents said about Enfield's green and blue spaces as part of the 2015 Consultation and Enfield Conversation

Sustainable Drainage Systems (SuDS) should be promoted in line with London Plan

A strategic approach is needed for the **protection and enhancement** of Enfield's green and blue infrastructure

The opportunity to **review Green Belt boundaries and Metropolitan Open Land** is supported in principle, but requires justification through the Local Plan process

Planning policies and site allocations must be informed by an **up-to-date borough-wide Surface Water Management Plan and Strategic Flood Risk Assessment**



9 Enfield’s green and blue spaces

9.1 Introduction

- 9.1.1 Enfield has a wealth of green and open spaces, providing recreational opportunities and habitat for local wildlife, making the borough one of London’s greenest places to live and one of the reasons why so many residents enjoy living here. About a third of Enfield is Green Belt, but there is an abundance of other types of green infrastructure too, including public parks, playing pitches and natural and semi-natural green spaces. The offer of green infrastructure ranges in size from small open spaces within housing estates to large areas of parks and woodland. Enfield is further enhanced by the benefits provided by the Lee Valley Regional Park (LVRP) which runs along the eastern edge of the borough, providing a ‘green wedge’ separating more urban areas.
- 9.1.2 Green Infrastructure (GI) is a term which refers to the network of green and blue spaces throughout the borough and includes features such as street trees, woodland and green roofs. These features provide many benefits, by; promoting healthier living, reducing the impacts of climate change, improving air and water quality, the storage of carbon and the encouragement of walking and cycling. These spaces not only provide the necessary habitats that improve biodiversity and ecological resilience but also provide space which naturally improves air quality and reduces the risk of flooding to people and property while enhancing the character of local areas and can positively effect increase in land value.
- 9.1.3 Green infrastructure must be planned and managed at both local and regional levels, and our approach is largely governed at a strategic level by the GLA. The ‘All London Green Grid’, ‘London Environment Strategy’ and ‘London Plan’ provide the basis from which the Council can set out how to plan and manage its green infrastructure at the local level whilst integrating with the far wider network of the Capital’s green and blue spaces.

9.2 Protecting and enhancing local open space

- 9.2.1 The Council will protect open space to ensure that provision meets the needs of existing and future residents. While the Council recognises that overall the level of open space quality and quantity is high in the borough, there are areas where this is not the case.
- 9.2.2 Areas of significant housing and population growth in Enfield increases the importance of protecting all existing open spaces within the green infrastructure network, and this is especially important in areas of identified deficiency. In these areas, the Council will seek new development and other projects to help to tackle this issue by seeking on-site open space provision or contributions towards improvements. While the context of these areas will mean that it is unlikely to be able to provide extensive areas of new open space, the Council will seek to create urban spaces to provide amenity and enjoyment to existing and new residents in these areas. In this respect, there is scope to apply Community Infrastructure Levy (CIL) or S106 receipts from development, to improve local parks and open spaces within the catchment of the development. In order to inform the new Local Plan, the Council will update its Open Space Study accordingly, which will be used to determine where such investments should be made that could help them adapt to likely increased use from population growth, whilst identifying accessibility standards for different types of open spaces according to their role and function.
- 9.2.3 There is also the scope for the Council to undertake a more thorough Natural Capital Account of the borough to understand how the benefits of green infrastructure are distributed across a broader range of green infrastructure types and areas in Enfield. Natural Capital Accounting can also play a role in assessing planning proposals and the Council is at an early stage of exploring these opportunities.

9.2.4 Sport and recreation uses are an integral part of the borough's infrastructure and contribute to the health and wellbeing of residents. The multifunctional use of open spaces for play, sport and recreation for example, is important and the Council support proposals that optimise such spaces for these uses. Schools and other institutions frequently host significant areas of open space, playing fields and sporting facilities. The Council recognise that there are opportunities to make better use of such facilities by allowing local residents and sports clubs joint use of such facilities. The Council will seek to engage with such organisations to enter into community use agreements to make available such facilities whilst also ensuring appropriate management arrangements. Where new facilities are proposed the Council will require such agreements are put in place.

9.2.5 The Council will seek to ensure that there is sufficient provision for children's play in the borough. Such spaces are particularly important in areas where families do not have access to large areas of private outdoor space, such as gardens. The Council will therefore seek for such developments to make provision for children's play space to tackle existing deficiencies, either through on-site provision, or investment in open spaces to enhance their access and functionality.

9.2.6 The Council will review its Open Space Study to provide an up-to-date position of areas of deficiency both in terms of levels of provision and access to open space and identify sites with scope for enhanced play provision. This will therefore be used to inform any future updates to this policy.

9.2.7 Enfield adopted its Playing Pitch Strategy for the period between 2018-2033. The Strategy sets out an action plan for the short-term future of the borough's sports pitches and concludes that Enfield's current plans can meet future demand up to 2023. Additionally, it sets out a programme for improvements of the borough's existing pitches to bring them up to recommended standards. Subsequently and as part of the new Local Plan, the Council will update its Open Space Study to ensure there is sufficient open space provision to meet its identified growth and demand up to 2036. This will enable the Council to plan for future provision in line with the growth anticipated.

Figure 9.1: The lake at Myddleton House Gardens





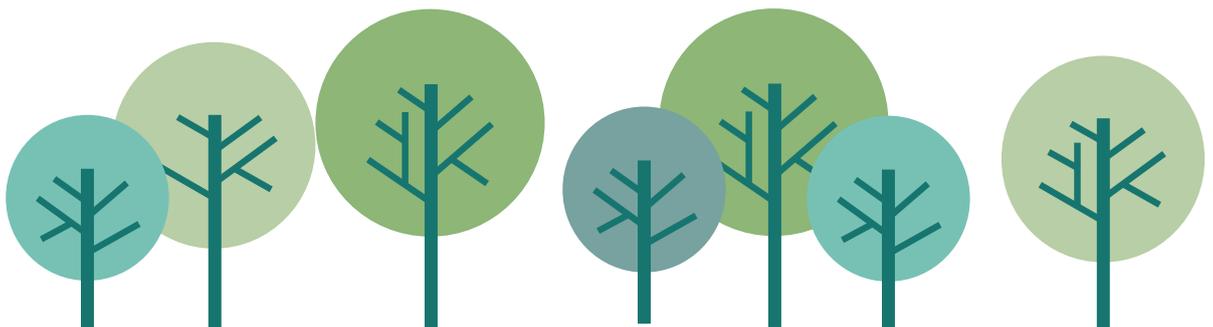
GI1 Draft policy approach: Green and blue spaces

The Council will protect, enhance the quality and improve access to open space.

We will achieve this by:

- a) Reviewing our open spaces and periodically update our Open Space Assessment to reflect quality, quantity and accessibility;
- b) Revising our Infrastructure Delivery Plan (IDP) to provide an up-to-date assessment of the need for all types of community infrastructure.
- c) Protecting all Open Space and Play Space in the borough as identified on the Policies Map. Any development proposals on such space should:
 - Be supportive of and ancillary to the purpose of that open space; and
 - Enhance the quality or accessibility of the open space.
- d) Enhancing the supply of open space to meet the identified needs of the borough’s growing population, by seeking on-site provision of publicly accessible open space, particularly in major new developments in areas of deficiency, as identified in the Council’s most up-to-date open space assessment, and in the emerging growth and investment areas as identified in chapter 2 of this Plan;

- e) Supporting improvements, enhancements and management that improve both quality and access to existing open spaces;
- f) Supporting new high quality outdoor leisure facilities to promote sports and active recreation across the borough;
- g) Promoting the multifunctional and shared use of existing open space for play and sports including schools and private sports facilities and playing pitches, subject to satisfactory management arrangements being put in place; and
- h) Supporting proposals for new children’s play space in line with the relevant policies in the London and Mayoral guidance.



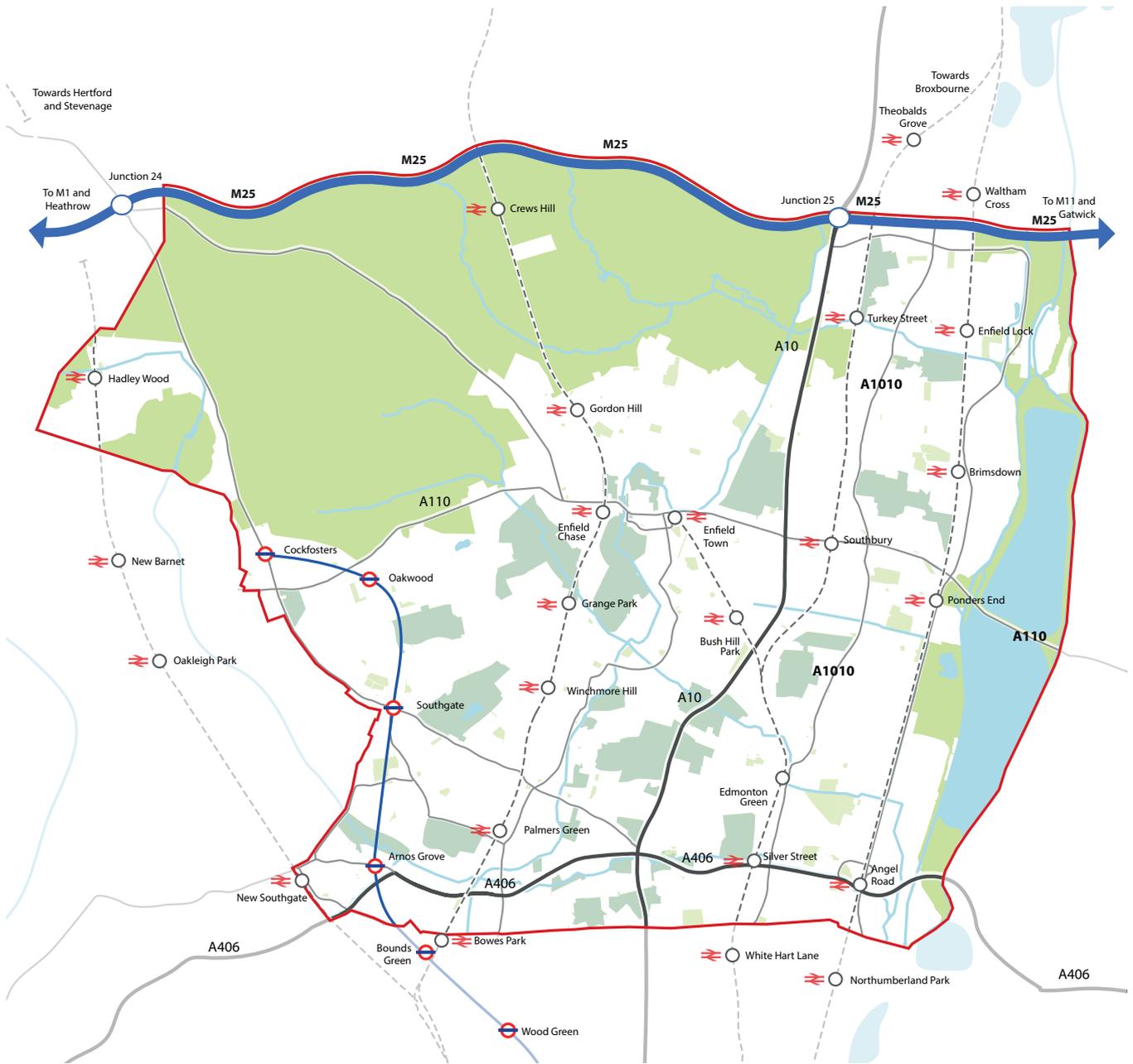


Figure 9.2: Map showing Enfield's open spaces

Key

- Enfield borough boundary
- Railway
- Piccadilly line
- Main routes
- Waterbody
- Green Belt
- Metropolitan Open Land
- Green spaces

9.3 Green Belt and Metropolitan Open Land

- 9.3.1 Green Belt is a significant feature of Enfield and covers around 3,000ha, representing about 37% of the borough, a third as previously mentioned. Enfield is ranked the ninth greenest out of the 33 London boroughs in terms of publicly accessible green space. As set out in the NPPF (2018), paragraph 134, the Green Belt has many functions, which most importantly for Enfield includes: checking the unrestricted sprawl of large built-up areas, safeguarding the countryside from encroachment, and assisting in urban regeneration, by encouraging the recycling of derelict and other urban land.
- 9.3.2 In the Mayor’s draft new London Plan (2017), Metropolitan Open Land (MOL) is defined as strategic open land within the urban area playing an important role in London’s green infrastructure - the network of green spaces, features and places around them and within urban areas. MOL protects and enhances the open environment and improves Londoners’ quality of life by providing localities which offer sporting and leisure use, heritage value, biodiversity, food growing, and health benefits through encouraging walking, running and other physical activity. Enfield has 36 sites that are designated as MOL, making up 249.07ha of open space in the borough located in more urban areas. In terms of protection, the principles of national Green Belt policy, also apply to MOL.
- 9.3.3 Both the Green Belt and MOL are important parts of the borough’s green infrastructure, with such land providing opportunities for outdoor sport and recreation, providing spaces for habitats and biodiversity, and access to nature for local residents. Equally, Green Belt and MOL also play an important role in helping to control flood risk and mitigating the risks of climate change.
- 9.3.4 The Council fully supports national policy on the protection of Green Belt land and is not proposing to vary its application giving strong protection to the Green Belt and MOL thereby resisting any inappropriate development within it in line with the principles set out in the NPPF. However, it is the role of the Local Plan to define Green Belt boundaries which are lasting.
- 9.3.5 In determining Green Belt boundaries, the NPPF makes it clear in paragraph 136 that, ‘once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period. Where a need for changes to Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through non-strategic policies, including neighbourhood plans.’
- 9.3.6 Regard has to be had as to how diverse Enfield’s Green Belt is and the different range of uses undertaken within it. For example, in the west of the borough, farming has played an important role in creating and maintaining an attractive agricultural landscape. And more recently recreation through the sensitive developments at Tottenham Hotspur training ground. In the east Green Belt lies predominantly within the Lee Valley Regional Park (LVRP), with its associated waterways and leisure activities. In the north, there is the nationally renowned Capel Manor Horticultural College. In addition, there are two major developed sites: Trent Park campus and the Picketts Lock leisure complex.



9.3.7 As mentioned in Chapters 2 and 5 of the Plan, the draft housing targets set by the Mayor require Enfield to make provision for a significant number of new homes over the plan period. Consequently, whilst the Council will be undertaking an up-to-date local housing need assessment and a Local Housing Land Availability Assessment, to inform the new Local Plan, the Council will in parallel undertake a review of its Green Belt boundaries to assess whether areas of the borough’s existing Green Belt still meet the purposes as set out in paragraph 134 of the new NPPF, and whether there are exceptional circumstances to alter Green Belt boundaries, to ensure the Council can plan positively to meet the development and growth needs of the borough.

9.3.8 Whilst the growth options considers the various delivery opportunities to meet our housing need, it is ultimately the outcomes of Enfield’s local housing need assessment, the housing land availability assessment, the requirement for any further industrial land, the Green Belt Boundary Review and relevant evidence combined that will inform the Council’s decision. Only if it has been demonstrated and concluded that it is necessary to release Green Belt land for development, in line with the NPPF, the Council will give first consideration to land which has been previously developed and/or is well-served by infrastructure and public transport. There are already strong sustainability arguments in favour of developing on some Green Belt land, for example Crews Hill could provide a highly accessible hub for growth supported by all necessary infrastructure.



GI2 Draft policy approach: Green Belt and Metropolitan Open Land

The Council will protect Green Belt and Metropolitan Open Land (MOL) for the purposes in accordance with the NPPF.

The Council will protect the openness of Enfield’s Green Belt and MOL by:

- a) Resisting new development regarded as inappropriate development as set out in the NPPF; and
- b) Supporting development, which improves access to Green Belt areas for beneficial uses such as outdoor sport and recreation, where there is no conflict with protecting the openness of such land.

We will undertake a Green Belt boundary review to assess if areas of the borough’s existing Green Belt still meets the purposes as set out in paragraph 134 of the new NPPF, and whether exceptional circumstances exist to justify changes to Green Belt boundaries to ensure the Council can plan positively to promote sustainable patterns of development and the growth needs of the borough.



Figure 9.3: Along the tow path of the Lee Valley Regional park

Figure 9.4: Example of a roof garden as seen Royal Arsenal, Woolwich



9.4 Greening the borough

9.4.1 Trees are a valuable feature of the urban and natural landscape and a key part of the green infrastructure network. The borough is home to approximately 256ha of native woodland of which approximately 122ha is classified as ancient woodland. Trees offer substantial benefits to people and the environment in improving air quality, reducing noise pollution, contributing to climate change adaptation, reducing the urban heat island effect, providing habitats for wildlife, contributing towards biodiversity and providing landscape structure and character. Street trees and those in more urban areas contribute to the visual quality and amenity of the public realm and help people relate to the urban environment. They also provide much needed valuable habitat for wildlife.

9.4.2 Enhancing biodiversity and increasing the amount of green areas through new development will have a number of benefits to Enfield. Soft landscaping and increasing the number of trees will have a benefit on biodiversity and equally, help to reduce the impact of higher summer temperatures and reduce rainfall run-off rates, which will help reduce the risk of surface water flooding, as well improving the health of residents for example through improved local air quality.

9.4.3 Walking in green areas also helps to improve the physical and mental health wellbeing of participants. Equally, there will also be visual benefits from a greener borough. Green or brown roofs, as well as living walls are also essential sustainable design consideration and provide many of the benefits of more conventional urban greening.

9.4.4 The inclusion of community gardens and allotments can play an important role in facilitating small scale food production, social cohesion as well as enhancing biodiversity. Where opportunities arise, space for local food growing will be encouraged for example, this could be through creative use of green roofs, walls and balconies serving the individual owner, or organisations including schools for local community projects.

9.4.5 Gardens can play an important part in maintaining biodiversity, as well as contributing to the townscape and quality of life. The Council will encourage proposals to provide enhancements to front gardens, thereby improving the street environment and biodiversity, whilst reducing the rate of surface water run-off and minimising the risk of flooding. More detailed guidance will be included in the next version of the Local Plan.

9.4.6 Proposals involving the loss of trees will result in a deterioration of the ecological value and environmental character of an area and will not be acceptable without a good cause, particularly if it is subject to a Tree Preservation Order. Development provide the opportunity to provide landscaping including tree planting on site.

G13 Draft policy approach: Greening the borough

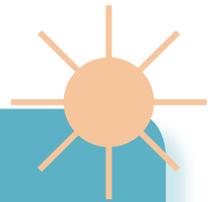
The Council will seek to enhance biodiversity and green infrastructure in the borough by:

- a) Maximising the provision of gardens, garden space and soft landscape treatment, seeking green or brown roofs and other planting as part of new development;
- b) Encouraging planting in both front and back gardens;
- c) Seeking to prevent the removal of protected trees;
- d) Seeking retention of existing trees and provision of new trees on development sites;
- e) Adding to the greening of streets and public realm; and
- f) Making Tree Preservation Orders where justified in the interests of amenity.

9.5 Biodiversity and Sites of Importance for Nature Conservation

- 9.5.1 Biodiversity is an important part of our lives and is also an indicator of the wider health of the environment. At global and more local levels, species are declining and the extent and quality of the ecosystems that supports them is diminishing too. Enfield is fortunate to have an abundance of green open space and waterways providing valuable habitat for a diverse range of biodiversity.
- 9.5.2 Despite having a wealth of parks and green spaces Enfield also has a number of areas which are severely limited in access to nature. In total 22% of the borough is classified by the Mayor of London as lacking in access to nature. These are areas that do not have 1ha of SINC per 1,000 population or are not within 1km of either a Site of Borough or Metropolitan Importance. Areas of deficiency in access to nature are primarily concentrated along the eastern side of the borough.
- 9.5.3 To prevent the degradation of natural habitats, designated sites will be protected, and development proposal must demonstrate that they do not cause adverse impacts, whilst contributing to their qualitative improvements through providing better access or on-site improvements. Open space provision in development provides an opportunity to create new habitats through landscaping, tree planting and the retention of existing trees, and innovative design features such as green roofs and terraces, artificial nesting structures for bats or birds, green and living walls and rain gardens as a means of enhancing biodiversity.
- 9.5.4 A wildlife/green corridor is a link of wildlife habitat, which joins two or more larger areas of similar wildlife habitat. These corridors are essential for the maintenance of ecological processes and allow for the movement of animals and the continuation of viable populations. It reduces the negative effects of inbreeding and reduced genetic diversity that can occur within isolated populations. Enfield currently has a network of green corridors which link the green belt to more urban areas within the borough.

- 9.5.5 Wildlife corridors should be protected, provided or enhanced where appropriate. A number of notable species have been recorded in the borough and are designated as National or London Biodiversity Action Plan priority species, including Great Crested Newt, Stag Beetle and the Spotted Flycatcher (Appendix 1 Enfield Biodiversity Action Plan). The priority habitats in the borough are set out in the biodiversity action plan for Enfield (Nature for People: A Biodiversity Action Plan for Enfield, 2011).



Facts

Sites of Special Scientific Interest (SSSI)

SSSIs are national designations that protect the country's best wildlife and natural assets, supporting rare and endangered species and habitats. The Chingford Reservoirs are a designated SSSI, which is made up of the King George V and the William Girling Reservoirs, located at the eastern edge of the borough. The Reservoirs, cover an area of 387ha, and form one of the major wintering grounds for wildfowl and wetland birds in the London area and hold nationally important numbers of some species.

Sites of Importance for Nature Conservation (SINCs)

SINCs are local designations that protect sites of local wildlife importance. There are six Metropolitan SINCs; 20 Borough SINCs; and 15 Local SINCs that are and will continue to be protected. Metropolitan and borough sites are of the highest priority for protection while Local sites are afforded lesser importance.



GI4

Draft policy approach: Biodiversity and Site of Importance for Nature Conservation

The Council will protect and enhance the borough's natural environment and seek to increase the quantity and quality of the borough's biodiversity.

We will achieve this by:

- a) Permitting development only where it can be shown that significant adverse impact on biodiversity is avoided, mitigated, or as a last resort, compensated;
- b) Protecting designated international, national and local nature conservation areas, as set in supporting facts, and supporting new designations;
- c) Promoting the qualitative enhancement of biodiversity sites, including improvements to access, connectivity and the creation of new habitat;
- d) Working with partners, to improve conditions for biodiversity; and
- e) Encouraging the greening of the borough, through landscaping and tree planting, and protecting existing trees through Tree Preservation Orders (TPOs) (see draft policy approach G3).

We will expect development proposals to:

- Contribute to the greening of the borough, by incorporating green roofs and walls, landscaping, tree planting and other measures to promote biodiversity such as bat and bird boxes, through the preparation of ecological plans and strategies where major developments are proposed, thereby resulting in a gain for biodiversity in the borough; and
- Contribute to the action plans as set out in the Enfield Biodiversity Action Plan (BAP).



Figure 9.5: Tree planting in the borough



Figure 9.6: Pymmes Park

9.6 Blue Ribbon Network

- 9.6.1 The borough is shaped by its waterways and has over 100 km of rivers and waterways, the greatest length of any London borough. The waterways also include Pymmes Brook, Salmons Brook, Turkey Brook and their tributaries, which flows across the borough to join the River Lee along the eastern edge of Enfield. The borough also contains a large section of the New River, which runs from Hertfordshire to North London, and is home to the Chingford Reservoirs.
- 9.6.2 These waterbodies form part of the strategic Blue Ribbon Network and are recognised as a valuable habitat for plants and nature conservation. They also have a multi-function role: they form open space and relief from the built environment, provide for a range of leisure interests for Enfield’s residents and visitors provide opportunities for employment and transport; form natural habitats; perform flood and surface water management functions and contribute to local context and character.
- 9.6.3 In recognition of the strategic role of the Blue Ribbon Network, the Council, in recent years has invested in a series of projects to enhance and improve the quality of these spaces. Recent watercourse restoration projects include Enfield Town Park Boating Restoration and Firs Farm Wetlands and River Restoration. Ongoing projects include Prince of Wales Wetlands, Broomfield Park Wetlands and Albany Park River Restoration.
- 9.6.4 The Blue Ribbon Network also has a unique role in the borough’s economy, and this will be protected and enhanced as development and regeneration provides new opportunities for enhanced waterside environments. Infrastructure that contributes to active uses of waterbodies includes: facilities for boat building, servicing and repair activities, mooring sites and posts, boathouses and boatyards, slipways and other landing or stopping places and waterborne freight. These facilities are assets for the borough and will be protected to support their continued use. At the same time, innovative uses of the network will be promoted, including opportunities for sustainable development, such as using water from canals for cooling.

Figure 9.7: River Lee





G15 Draft policy approach: Blue Ribbon Network

The Council will protect and enhance the borough's Blue Ribbon Network, recognising the multi-functional role that rivers and waterways play and their potential to contribute to the borough's growth strategy.

We will achieve this by:

- a)** Recognising the strategic importance of the borough's Blue Ribbon Network and through working with our partners to promote the enhancement of the waterways;
- b)** Promoting opportunities for improved access to waterways, including the provision of infrastructure to support walking, cycling, leisure and recreation and river-based transport;
- c)** Recognising the role of the Blue Ribbon Network plays in flood and surface water management by safeguarding access to flood defences and working with the Environment Agency (EA);
- d)** Protecting habitats in the Blue Ribbon Network consistent with Enfield's Biodiversity Action Plan (BAP) (see draft policy approach G4); and
- e)** Promoting the improvement of water quality in the Blue Ribbon Network by working with the EA and other partners.

We will expect development proposals to:

- f)** Demonstrate that adverse impacts on waterside environments are avoided where developments in, over or adjacent to waterbodies are proposed;
- g)** Have regard to the context and character of the Blue Ribbon Network;
- h)** Restore waterbodies to their natural state and ensure developments are set back to provide a minimum 8m buffer strip to the main river. 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); and
- i)** Provide an assessment of the impact of the proposal on the status of the waterbody, where it is likely that a proposal would have a significant adverse impact.



9.7 Burial space and crematoriums

- 9.7.1 Cemeteries, churchyards and other burial grounds have a distinct primary function. This function needs to be protected so that there is sufficient burial space available in the borough to meet the needs of different groups now and in the future. Additionally, these spaces also provide green, quiet areas for people, whilst also contributing to and promoting biodiversity (see draft policy approach G15).
- 9.7.2 In the Mayor’s Draft new London Plan (2017), draft policy S7: Burial Space states boroughs should ensure provision is made for the different burial needs and requirements of London’s communities, including for those groups for whom burial is the only option.
- 9.7.3 The Council owns five cemeteries in the borough. This includes: Edmonton, Lavender Hill Strayfield Road, Southgate and Hertford Road, Cemeteries. Enfield Crematorium is run by Dignity, a private company. The site is 20ha but most of this comprises gardens of remembrance. The London borough of Islington owns Trent Park Cemetery, a lawn cemetery which opened in 1960. Tottenham Park Cemetery is owned by a private company, Badgehurst predominantly used for the burials from the Muslim community In addition there are four Jewish Cemeteries in the borough: the Western Synagogue Cemetery in Edmonton, the Federation of Synagogues Cemetery in Edmonton, Adath Yisroel Cemetery in Enfield and the Bulls Cross and Western Synagogue Cemetery.
- 9.7.4 Existing burial reserves in the borough are expected to last until 2030/31 as estimated by the Audit of London’s Burial Provision published in March 2011 by the GLA. However, this capacity is assessed as “Problematic” according to the study’s classification system and consequently there may be additional need for burial space which arises in the future.
- 9.7.5 In order to plan for existing and future growth in Enfield, the Council will support additional burial space and crematoria to cater for the requirements of different religious groups and changing funeral demands based on an up-to-date and local identified need assessment.

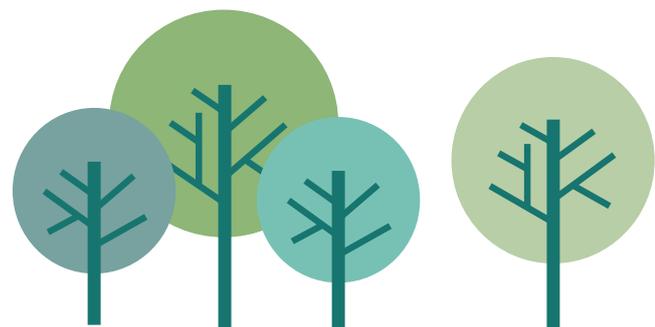
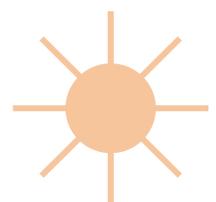


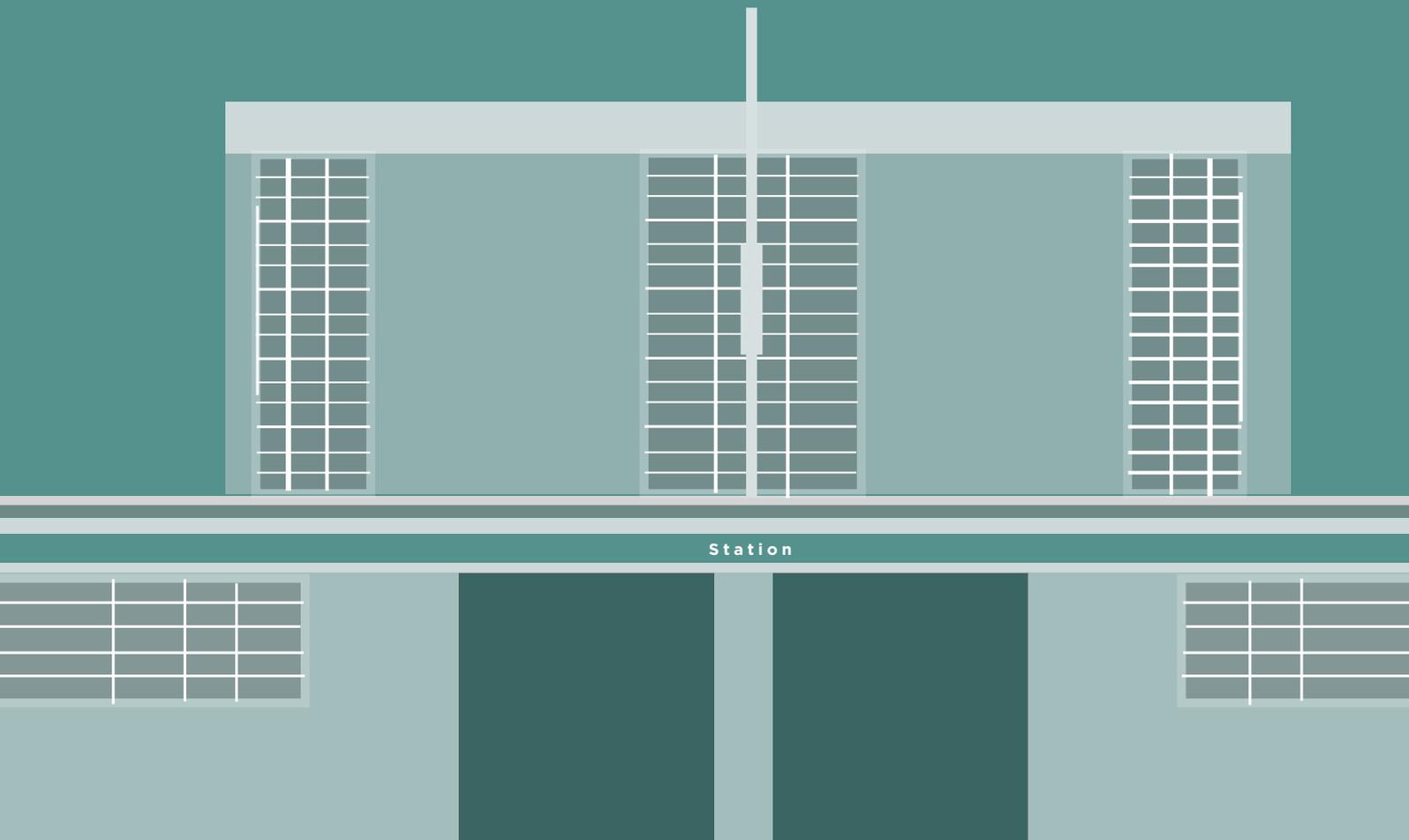
G16 Draft policy approach: Burial space and crematorium

The Council will work with the religious community to inform future burial provision and will work with partners including cross boundary and sub-regional local planning authorities, where appropriate to identify and address the requirements of these groups and to tackle burial space shortages.

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

- a) There is an identified need for the space;
- b) It would not harm the amenity of nearby residents;
- c) The landscape is maintained;
- d) Associated built facilities are of an appropriate scale to their surroundings; and
- e) There is no undue impact on the safety and functioning of the public highway.





Station

10 Sustainable movement and transport

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10.2	Making public transport more accessible	179
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10.4	Making active travel the natural choice	187
10.5	Making more school trips safe, sustainable and healthy	189



What respondents said about accessibility and transport as part of the 2015 Consultation and Enfield Conversation

Intensification and growth in the borough is supported but needs to be supported by improvements to public transport

The need to change travel behaviour to reduce reliance on the private car

Crossrail 2 is welcome and provides opportunity for development

The most popular area for new homes was in the Lee Valley corridor followed by the Enfield's town centres and then transport nodes

The most popular investment for transport were improvements to the A406 and commuter rail line

The need to tackle road congestion

Enhancing public transport in particular to the West Anglia Main Line and improvements to the Piccadilly line were supported

Improvements to public transport supported

Improvements and enhancements to cycling lanes and pedestrian routes supported



10 Sustainable movement and transport

10.1 Introduction

10.1.1 Improving access and movement, particularly for sustainable modes, within the borough is a key issue, particularly if Enfield is to accommodate housing and employment growth. Improvements to transport infrastructure and promoting sustainable modes of transport also have implications for future growth, air quality, health and climate change. Therefore, transport policies have an important role to play in facilitating sustainable growth but also in contributing to wider sustainability and health objectives for the borough.

10.1.2 Optimising land use is dependent on directing growth to areas well connected by present and future public transport, cycling and walking networks. New and enhanced transport links will play a critical role in supporting a high density mix of land uses and co-location of different uses as the intensification of town centres and transport hubs, as well as redevelopment of brownfield sites is explored. Public infrastructure will also play a critical role in supporting associated investment in areas and ensuring that amenities are within cycling and walking distance which will not only promote healthy environments but also foster strong and vibrant communities.

10.1.3 Transport plays an important and supportive role by connecting the environment and providing the conditions to promote infrastructure in places that can positively affect the wellbeing of communities. Enfield is ranked the 12th most deprived borough in London, with deprivation showing a distinctive spatial pattern concentrated in the east and south of the borough where there is a stark difference in life expectancy compared to the west of the borough.

10.1.4 The growth that Enfield is expected to experience provides an opportunity to address and reduce health inequalities in the borough. A more immediate and direct impact on the wellbeing of residents can be achieved through the promotion of more sustainable modes of transport such as cycling and walking and reduction in the use of cars which will help to tackle poor air quality and climate change. Equally, as critical to health and wellbeing is the role that transport can play in improving access to sustainable and affordable high-quality housing, employment opportunities within and outside of Enfield, and amenities and services.

10.1.5 Enfield, along with other outer London boroughs, faces the difficult challenge of modal shift given the deficit position of current networks and more spacious and lower density land use. For example, the distance of travel within and through Enfield is higher than inner and central parts of London, which means car ownership is significantly higher than that of inner London boroughs. Consequently, this provides unique issues and challenges for the borough in not only promoting a longer-term vision of modal shift to more sustainable modes of transport but to also support the short term strategic infrastructural needs of a rising population and new development.

10.1.6 The built environment can help influence changes in lifestyle and help achieve positive health outcomes. The Council will seek to secure a local environment which promotes physical activity through new development by removing the burden of behaviour change being placed on the individual as a sole means to improve health.



Figure 10.1: Enfield’s current road network

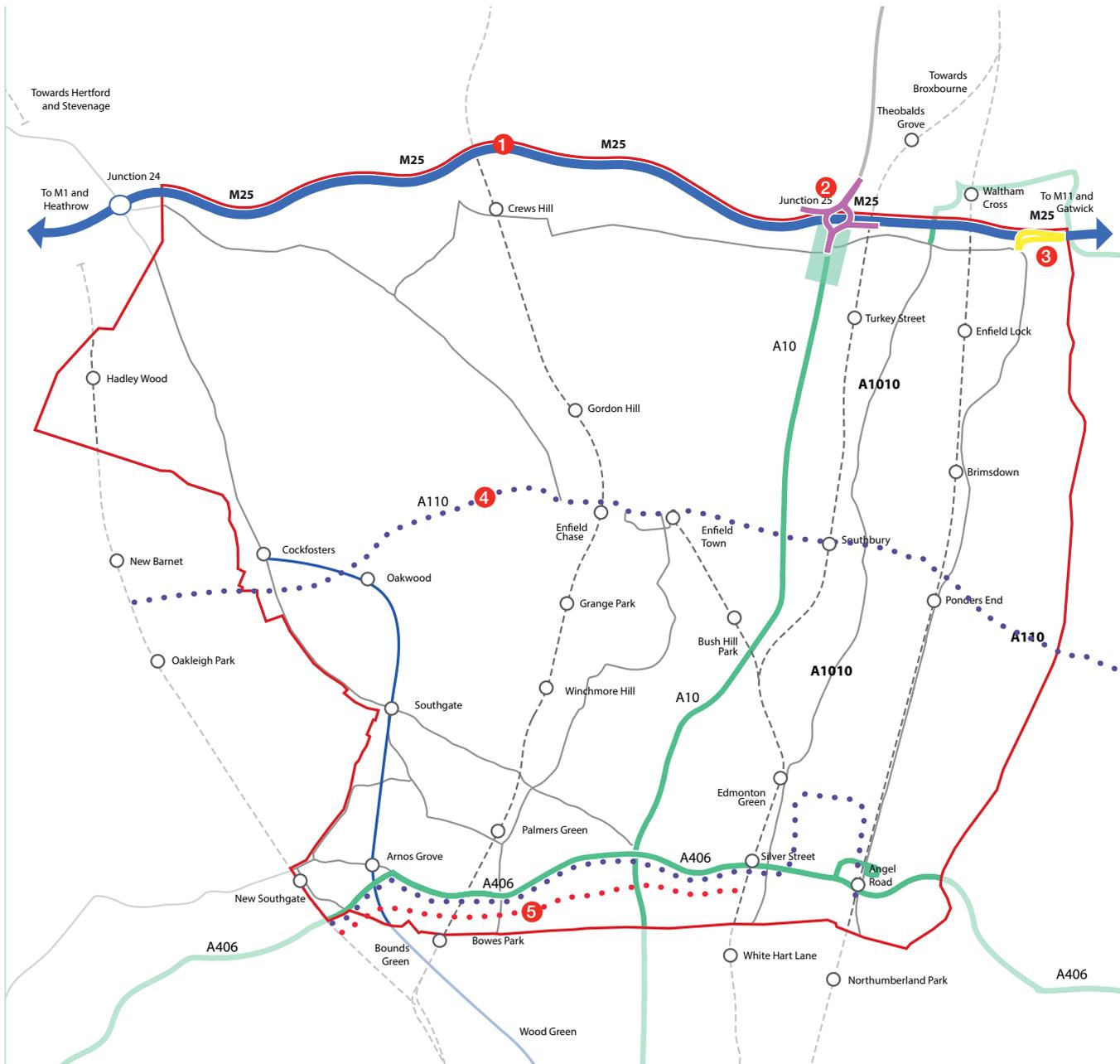


Figure 10.2: Strategic road network and potential improvement schemes

Key

- | | |
|----------------------------|---|
| Enfield borough boundary | Strategic road network |
| Railway | M25 Junction Improvement |
| Piccadilly line | Enfield road investment strategy 2 submission - east facing slips |
| Main routes | Rapid transit potential corridor |
| National Rail station | A406 tunnelling project |
| London Underground station | |

10.2 Making public transport more accessible

Public transport as the natural choice for longer trips

10.2.1 A key objective is to improve public transport and accessibility in the borough, whilst reducing the adverse impact of road traffic and traffic congestion. The level of population and employment growth proposed over the next 15 years will necessitate increased investment in public transport to improve transport accessibility for all users, and the Council will work with its partners, transport operators and developers to ensure that this takes place.

Figure 10.3: Cycle lane as seen in Winchmore Hill



10.2.2 The Council will also seek to ensure that major new development is located in areas with high levels of public transport accessibility, thereby reducing the need to travel by private car, minimise energy use and to increase opportunities for walking and cycling. Consequently, if there is not adequate capacity in the transport system, our strategy for promoting growth may be constrained or delayed.

10.2.3 The health and wellbeing of residents and visitors using the public highway and transport network is an essential consideration for the Council. Growing the awareness of air quality and vehicle emissions is key to improving the health of the public highway for all users. The Council will seek to develop initiatives that increase public awareness regarding air quality and work with stakeholders to drive modal shift towards lower emission modes of transport.

10.2.4 Improving accessibility of the public transport system is critical to delivering a better transport experience for all of our residents, including those with mobility and other difficulties, and growing numbers of older people. Public transport accounts for 20% of travel in Enfield and its coverage and accessibility varies significantly across the borough. Apart from the good public transport accessibility levels (PTAL) around our town centres, there is a spread of very low PTAL scores throughout the borough. Consequently, the borough's public transport system is not inducing a modal shift away from private motor vehicles.

10.2.5 Travelling by bus accounts for 14% journeys made by residents, which is the third highest method of travel in Enfield. The requirement for a reliable and efficient bus network in the borough is high. Bus wait times have risen over the previous two years due to congestion and therefore measures will need to be taken to reduce the impact of cars on our roads and to also work with Transport for London (TfL) to seek Bus Priority measures to reduce waiting times. New and improved bus services will be sought to improve east-west connectivity and improve connection between our town centres in the east and west of the borough.

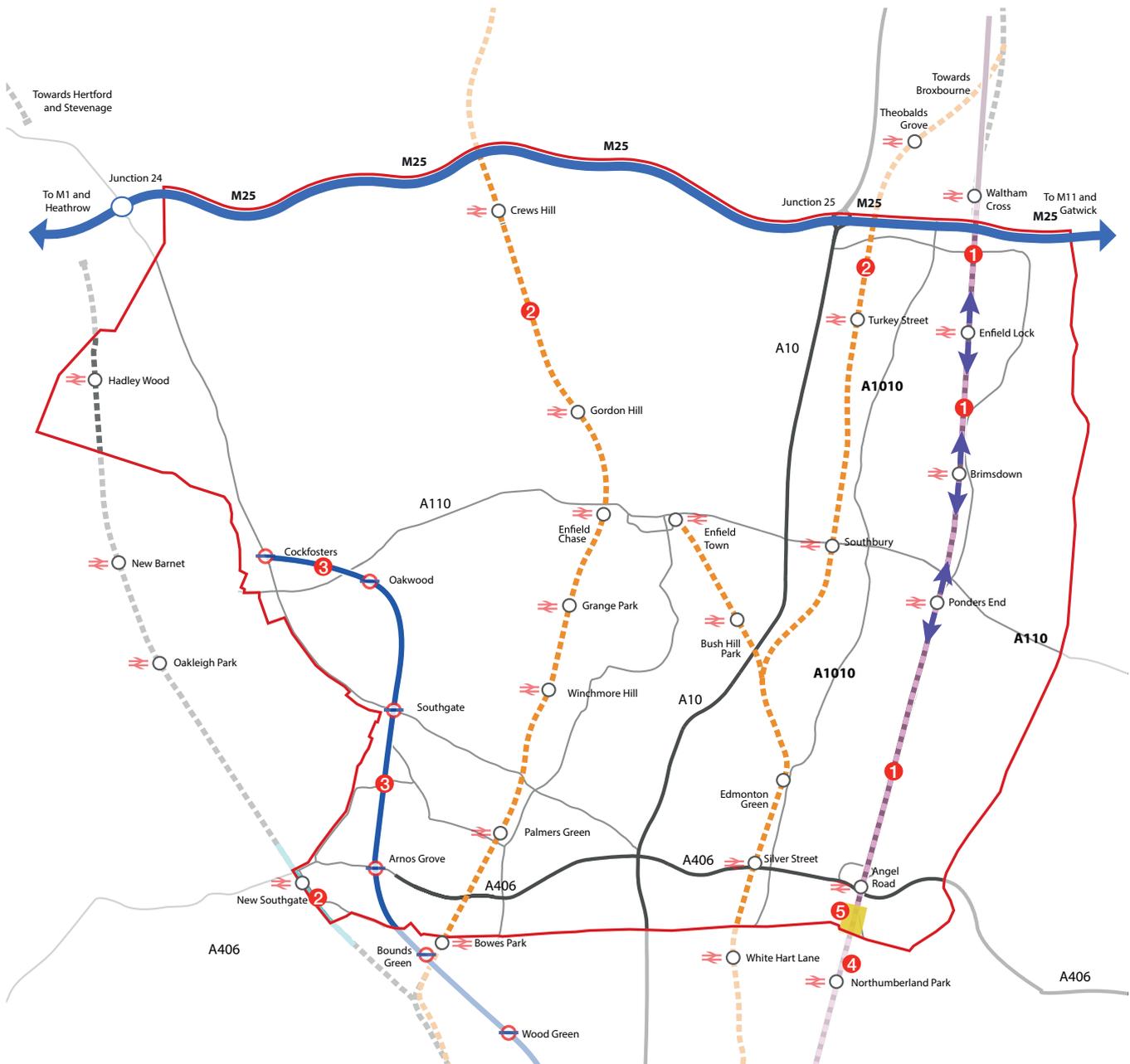


Figure 10.4: Phased Rail Infrastructure Improvement

Key

- | | | | |
|--|----------------------------|---|---|
|  | Enfield borough boundary |  | Crossrail2 - 2034 and Four-Tracking of the West Anglia Mainline |
|  | Railway |  | Rail and station improvements |
|  | Piccadilly line |  | Piccadilly Line upgrades |
|  | Main routes |  | Four-Track section of Meridian Water regeneration area |
|  | National Rail station |  | New Meridian Water station |
|  | London Underground station | | |

10.2.6 The underground network is concentrated in the west of the Borough. Whilst there are four underground stations serving the Piccadilly Line: Cockfosters, Oakwood, Southgate and Arnos Grove, usage of these stations has increased significantly over the last ten years. An increasing population will increase pressure on the network and therefore higher frequency and more action is needed to ensure there is sufficient capacity for the future to cater for this. In this respect, the Council will continue to work with TfL to ensure its 'Deep Tube' lines improvements provide new trains and signalling systems across the Piccadilly line to support the regeneration of the borough.

10.2.7 Whilst the east and west of the borough is served by a combination of over and underground rail links to and from central London, communities in the east of the borough are poorly served by public transport, with a low frequency rail service, slow journey times, frequent delays and poor-quality stations along the Lee Valley corridor. It is forecast that by 2043, demand for rail travel along this line will have increased by 39% and it is therefore critical to continue to make capacity improvements along this line.

10.2.8 The Council supports the routing of Crossrail 2 through the enhancement and Four-Tracking of the West Anglia Mainline which will allow an additional four trains per hour thereby increasing capacity and reducing congestion and journey times, whilst integrating the corridor and improving connectivity into and out of London. The delivery of this major strategic infrastructure project is an essential precursor for Crossrail 2 which would further enhance the Lee Valley corridor to provide 10-12 trains per hour along the line with new, more regular services to and from central London, connecting with existing Underground and National Rail services.

10.2.9 There would also be significant improvement works at each station along the line to accommodate the longer trains, as well as the installation of new lifts or ramps at all stations to provide step-free access, and removal of existing level crossings to increase safety and improve local road connectivity. Four-Tracking and Crossrail 2 will contribute to the ongoing economic redevelopment of Angel Road, Ponders End, Brimsdown, Enfield Lock and the wider Lee Valley, helping to unlock new development sites. This approach aligns with the aims of the Council's Corporate Plan to drive investment in rail, road and cycling infrastructure to improve connectivity and support economic development.

Angel Road > Meridian Water station

Angel Road is currently going through the DfT decommissioning process and the station is being relocated within the Meridian Water Development site south of Angel Road, with the station renamed as Meridian Water and due to be operational in May 2019.

Strategic and Major Roads Network

- 10.2.10 Accommodating future growth in the borough through intensification and densification will require not only phased rail infrastructure investment but also new road infrastructure, both strategic and local network.
- 10.2.11 The Council has been progressing with the Northern Gateway Access Package (NGAP) project that will coordinate strategic and major road network connectivity comprehensively through detailed technical assessment to overcome long-term congestion and air quality management issues for residents and businesses that live and operate close to existing networks.
- 10.2.12 The Council supports the Mayor's A406 Tunnelling project proposals in the south-west of the borough in New Southgate, which have the potential to improve long-term air-quality and congestion issues for residents and business not just within Enfield, but also our adjoining boroughs of Barnet and Haringey.



Crossrail 2 in Enfield could:

- Support potential to support the delivery of a significant number of new homes to meet a strong and increasing housing demand;
- Enable the transformation of predominantly low-density employment areas into higher density mixed-use multi-layered communities with new stations. Therefore, continued coordination between the Council, Greater London Authority (GLA), Transport for London (TfL) and Network Rail is paramount to ensure that planning policy is coordinated to maximise Crossrail 2 growth potential to assist with the regeneration in the borough;
- Provide a huge uplift in public transport accessibility, improve access to employment by reducing journey times to key destinations into London and in the London-Stansted-Cambridge Innovation Corridor; and
- Enable early Four-Tracking of the West Anglia Mainline as a stage of Crossrail 2 to increase capacity, frequency and unlock early growth around future Crossrail 2 stations.



T1 Draft policy approach: Making the public transport more accessible and the natural choice for longer trips

The Council will work with strategic partners to secure investments to make the public transport network more accessible and the natural choice for longer trips including rail and bus operators, cycle and highway services. These enhancements will maximise the borough's regeneration potential and support growth whilst also helping achieve our environmental objectives.

We will achieve this by:

- a) Supporting planned infrastructure projects to promote sustainable growth in Enfield, including increased capacity and reliability of the Piccadilly Line, Crossrail 2, Four-Tracking of the West Anglia Mainline as a stage of Crossrail 2 including associated infrastructure to improve east-west connectivity;
- b) Promoting strategic and major road network enhancements;
- c) Promoting East-West Rapid Transit;
- d) Seeking localised improvements to the highway network to reduce congestion on the east-west routes in the borough; and
- e) Promoting cycling and walking networks.

We will expect development proposals to:

- Ensure that access to existing and future infrastructure projects is safeguarded and considered where appropriate through appropriate design. Proposals which are contrary to the safeguarding of strategic infrastructure improvement projects will be refused;
- Contribute financially towards bus network infrastructure improvements, including new and improved bus services promoting east – west routes and frequency upgrades to existing routes;

- Ensure that access and interchange improvements to local rail and tube stations is considered where appropriate, including through appropriate design; and
- Provide and where appropriate contribute financially towards creating well connected, high quality, convenient and safe cycle routes, walking routes and associated infrastructure.

10.3 Reducing the impact of private vehicles on our streets

- 10.3.1 The Mayor has set an ambitious aim to reduce dependency on car-based transport in favour of increased walking, cycling and public transport use and sets a target of 80% of all trips in London to be made by foot, cycle or public transport by 2041.
- 10.3.2 As an outer London borough, Enfield has a unique challenge in reducing the number of journeys made by private motor vehicles. With distance of travel higher within and through Enfield compared to inner London boroughs, car ownership is significantly higher when compared with inner London and London as a whole. In Enfield, only 32.5% of households do not own one or more cars. This compares to a London average of 41.6% and an inner London average of 56.7% thereby indicating the deficit position of current transport networks within the borough.
- 10.3.3 The environmental impacts of motorised transport have significant implications on the health and wellbeing of people.
- 10.3.4 In 2016, motorised traffic grew by 1.6% across London and in Enfield, 843,357.02 motor vehicle miles were travelled in 2015, higher than each of the preceding 14 years and 38,927.12 miles greater than travelled in 2014 and with trend of steady growth since 2013, indicating a need to tackle this rising trend. Of the 13 biggest causes of illness and early death, seven have links with the way people travel, including obesity, high blood pressure, type 2 diabetes, high cholesterol, kidney disease, low physical activity and poor air quality.
- 10.3.5 With 30% of the number of trips made by car in Enfield less than 2km and 60% less than 5km, there is substantial scope to reduce the number of journeys made by private motor vehicle and to promote more sustainable modes of transport that will help to manage and reduce the outlined health risks of motorised transport.
- 10.3.6 The Council wants to apply the healthy streets approach by putting people, and their health, at the heart of decision making. This results in a healthier, more inclusive city where people choose to walk, cycle and use public transport. The best way to get more people out walking, cycling and using public transport is to improve the quality of the experience of being on streets. The Healthy Streets Approach focuses on creating streets that are pleasant, safe and attractive, where noise, air pollution, accessibility and lack of seating and shelter are not barriers that prevent people - particularly our most vulnerable people - from getting out and about.

What is the 'Healthy Streets' approach?

The Healthy Streets Approach is an evidence-based approach to improve health and reduce health inequalities, which will help Londoners use cars less, and walk, cycle and use public transport more. It supports the delivery of the Mayor's aim that by 2041 all Londoners will be able to undertake at least the 20 minutes of active travel each day needed to stay healthy. It also requires better management of freight so the impact of moving goods, carrying out servicing and supporting construction on London's streets is lessened. To apply the Healthy Streets Approach, changes are required at strategic, network and street level.



T2 Draft policy approach: Reducing the impact of private vehicles on our streets

The Council will secure a more sustainable local travel network that maximises opportunities for walking, cycling and using public transport, reduces congestion, improves public realm and improves health and well-being.

We will achieve this by:

- a) Using the Healthy Streets approach to improve poor air quality and tackle climate change by reducing the reliance of private motor vehicles, easing levels of traffic and congestion and providing infrastructure to support alternative sustainable modes of transport to provide access to employment, schools and services;
- b) Ensuring quality public realm, safe road crossings, signage and greening to create healthy and attractive environments that support and encourage people to choose to cycle and walk;
- c) Promoting road safety and safer cycling and pedestrian movement around town centres and transport nodes;
- d) Supporting behavioural change by providing opportunity for car club development, establishing car clubs and promoting car sharing, where appropriate; and
- e) Adopting maximum car parking standards and car-lite housing wherever feasible.

We will expect development proposals to:

- Incorporate electric vehicle charging points for electric vehicles, when providing for car parking. As a guide, at least a fifth of off-street parking places must be equipped with electric vehicle charging infrastructure. Contributions will also be sought for on-street electric vehicle charging infrastructure;
- Include appropriate provision for car club vehicles;

- Be sensitively designed by considering design and public realm measures to reduce impact of expected changes in climate, including permeable surfaces; and
- Seek to mitigate the impact of road-based freight and promote alternatives.



Figure 10.5: Electric charging points



10.4 Making active travel the natural choice

Trips less than 2km in length

- 10.4.1 Transport choices have a significant impact on people’s health. Increasing the number of journeys made by cycling or walking, particularly for trips under 2km, is a key priority for Enfield. The borough has one of the lowest cycle rates in London. The 2011 Census states that cycling represented only 1% of the method of travel to work in Enfield, with walking representing 7%, both lower than the London average. By contrast, driving a car/van or passenger travel represented 47% of the method of travel to work compared to a London average of 31%. Whilst various factors will contribute to the clear differences of methods of transport between Enfield and London as a whole, Enfield nevertheless has a disproportionately high percentage of people travelling to work by less sustainable modes of transport when compared with the rest of London.
- 10.4.2 Enfield is one of five outer London boroughs identified as having the greatest number of potentially cycle-able trips. Nearly 80% of car trips in Enfield are of cycle-able length, but less than 1% of journeys are made by bicycle. In 2014, Enfield was awarded £30 million funding from the Mayor’s Mini-Holland fund to deliver the Council’s Cycle Enfield programme. A further £12 million in other funding sources have made to facilitate the scheme providing a significant opportunity to increasing the number of people cycling in the borough, whilst creating high quality public realm and encouraging more people to choose to walk.

- 10.4.3 The health benefits from increased physical activity in the form of cycling and walking will promote significant long-term health improvements in the borough, whilst at the same time help to prevent and manage various health conditions, including coronary heart disease and stroke, diabetes and obesity. Similarly, an increase in active travel brings further health benefits beyond physical activity for residents. High quality public realm improvements will create and foster environments that promote cleaner air, less noise, safer streets and less road traffic injuries. The interconnection of all these issues is intrinsically linked to cycling and walking and in order to maximise all health benefits we must encourage people to cycle and walk wherever possible. This is in line with the Council’s Corporate Plan to build measures into policies and strategies to improve public health and wellbeing.

Figure 10.8: (left) Cycle lane on A105 as part of guided rides (below) Cycle Hub, as part of Cycle Enfield opening outside Edmonton Green station





T3 Draft policy approach: Making active travel the natural choice

The Council will ensure active travel is the natural choice, particularly for those trips less than 2km in length.

We will achieve this by:

- Encouraging and supporting the increasing use of bicycles; and
- Facilitate walking.

For cycling:

The Council will encourage and support the increase use of bicycles by requiring new developments to contribute towards the following measures:

- a) To include the provision and maintenance of convenient accessible and safe secure cycle parking within the boundary of the site;
- b) To include the provision of changing and showering facilities;

Developer contribution for improvements to cycling infrastructure, including contributions to the extensions of the Cycle Enfield initiative or other cycle hire scheme to mitigate their impact on the existing network.

For walking:

The Council will facilitate walking by requiring major developments to:

- c) Protect and enhance existing footpaths. Proposals that negatively affect existing footpaths, walkways and public realm will be required to demonstrate that alternative provisions adequately outweigh losses such routes;
- d) Provide new walkways which are accessible, inclusive and safe, within and through their site;
- e) Provide walkways that are wide enough to support cycle and pedestrian uses; and
- f) Provide links between existing footpaths and walkways and to town centres, public transport infrastructure and green spaces, where appropriate.



10.5 Making more school trips safe, sustainable and healthy

- 10.5.1 A major risk factor for long term health of local children in Enfield is the continuing trend of unhealthy weight. There are 94 schools in the borough and these generate a significant number of car-based journeys at the start and end of the day. National trends indicate that children’s independent travel to school is decreasing, playing a contributing factor in their ability to maintain a healthy weight.
- 10.5.2 Childhood obesity is a concern in Enfield. Around 23% of Reception age children and 41% of Year 6 children are either overweight or obese. These percentages are higher than both the London average and national average, with Enfield’s prevalence of overweight or obesity representing the sixth highest of London boroughs.
- 10.5.3 A holistic approach of further intervention is required to support more healthy lifestyles amongst children in Enfield. Creating the environments for and encouraging children to cycle or walk, or use public transport, as a mode of travel to school will play a significant role in improving children’s health.

T4 Draft policy approach: Making more school trips safe, sustainable and healthy

New residential development proposals must demonstrate methods to make school trips safe, sustainable and healthy, reducing car use through the promotion of alternative sustainable transport options and initiatives.

We will expect development proposals to contribute to this through the following measures:

- a) Provide and where appropriate requiring developer contributions towards creating well connected, high quality, convenient and safe cycle and walking routes to local schools to mitigate their impact on the existing network;
- b) Contribute to infrastructure, including secure cycle storage at local schools; and
- c) Contribute to training and road safety education programmes at local schools.

Figure 10.9: Making streets safer, as seen outside Edmonton Clinic





11 Sustainable infrastructure and environmental impact

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Appreciation of Enfield's natural environment

The option of Green Belt review to support growth needs to be explored once all brownfield options have been exhausted

The importance of protecting and enhancing suburban, rural and landscape settings and the character of different borough areas, as well as how this relates to community cohesion needs to be considered

Concerns about impacts of growth on pollution, residents' health, congestion, infrastructure capacity, views, landscape and local character need to be addressed

What respondents said environmental impact as part of the 2015 Consultation and Enfield Conversation

Support for Edmonton EcoPark as an established and strategic waste site

The need for new development to be of high quality with sufficient green areas, underpinned with sufficient social and physical infrastructure

Concerns about inequalities in the quality of and access to infrastructure and the natural environment

The need to protect and enhance the borough's environmental assets and to maximise space and provide opportunities for leisure, agriculture, nature conservation, habitats, green and wildlife corridors, flood risk compensations and flood alleviation needs to be considered as part of growth

11 Sustainable infrastructure and environmental impact

11.1 Introduction

- 11.1.1 Green space covers over a third of the borough. This comprises farmland as well as natural and urban green space, including 41 Local Wildlife Sites. Gardens are not included and if they were, this percentage would be even higher. The borough's natural environment is a considerable asset, adding to local quality of life, and greatly appreciated as such by residents. Yet despite this, like the rest of London, the borough suffers from air and noise pollution, congestion, contamination, pressures on green space, flood risk, as well as other environmental hazards which pose risks to residents' health and wellbeing and to the quality of the local natural environment.
- 11.1.2 Some of these environmental challenges originate indirectly from human activity, for example through climate change. Others are due to natural factors such as underlying geological context. However, most are directly caused or exacerbated by human activity or development. New and existing households, business and developments all contribute to pollution and carbon emissions, consume water, energy and other natural resources, put pressure on local infrastructure and produce waste and waste water. Many make smaller or larger scale alterations to local land, such as turning permeable into impermeable surfaces, for example by turning front gardens into driveways.
- 11.1.3 Environmental assets and challenges are also not equally distributed throughout the borough. Amongst other factors, inequalities in local environmental quality and in access to sustainable infrastructure and environmental assets can contribute to discrepancies between life expectancy and poverty rankings between east and west Enfield, which the Council is keenly committed to reducing. Further inequality is experienced between generations. Children, the elderly and the chronically ill suffer disproportionately from the negative health effects of pollution and the borough's children in particular will see more of the long-term environmental effects of our current and upcoming development and behaviour.
- 11.1.4 Future development has the potential to significantly worsen as well as improve issues and inequalities, depending on how this is undertaken and managed. Awareness of climate change, of its source in human activities and of its devastating effects is on the rise, as are the methods available to assess, manage and alleviate negative environmental impacts. Growth and regeneration offer opportunities to rebalance access to, quality of and provision of infrastructure and environmental assets.
- 11.1.5 The Mayor, in his new draft London Plan and Environment Strategy (2018), sets out his plans for transforming London's environment into a cleaner and greener place, ready for the future. The Council share the Mayor's ambitions and welcome his proposed, ambitious strategy for addressing the challenges of improving air quality, green spaces, biodiversity, greenhouse gas emissions, energy use, waste management, flood and heat risk, water scarcity, river water quality, and ambient noise in the capital. We particularly welcome his recognition of the interaction of poverty and pollution in combining to further inequalities in many of our most deprived communities, which are often suffering from the worst environmental quality.
- 11.1.6 However, while Enfield operates in many ways as a part of Greater London, it is also a town in its own right with a population of about 338,000 people (a larger population than say Cardiff, Belfast or Coventry) and therefore has its own, distinct sustainability challenges and opportunities, which the Council will continue to address in a unique way through this Plan as well as through its Corporate Plan. The Council wants to ensure that development in the forthcoming plan period helps create a cleaner, greener, healthier Enfield, is of a high sustainable standard and design, is underpinned by appropriate sustainable infrastructure and a high quality natural environment, with equal access across the borough and that environmental impact of future development and activity is suitable monitored, minimised and mitigated.



11.2 Sustainable building

- 11.2.1 As growth in the number of people, households and businesses in the borough accelerates, it will become increasingly crucial that planning helps to limit the environmental impact of development, both in its construction as well as in its operation. This first section of this chapter deals with the impact of building.
- 11.2.2 The anticipated scale and density of development is unprecedented in recent decades. Therefore, it will be more challenging to scale up the Council's considerable current efforts to decrease environmental impact and enhance sustainable infrastructure provision, especially with limited resources at our command.
- 11.2.3 As more development takes place and convenient sites become more scarce, there is also increased need for decontamination of land as part of the development process. Enfield's urban nature and varied past land use including extensive industrial activity mean that most potential development sites in the borough will require remediating and / or protective action to prevent mobilising further contaminants.
- 11.2.4 The environmental performance of some new development has been deficient in recent decades and has often not fulfilled design and expectations. Additions to the built environment have a significant long-term impact. Existing buildings will continue to make up the large majority of overall stock and therefore continue to impact on resource consumption, fuel poverty, emissions, pollution and waste.
- 11.2.5 The Mayor's new draft London Plan (2017) presents a significant opportunity to drive increased energy efficiency and overall sustainability of new London developments. It marks a significant step forward in environmental planning policy while also representing a significant challenge. The Mayor's vision is of a greener and cleaner city, which is ready for the future. Many of the principles brought forward in the draft London Plan are based on the Mayor's Environment Strategy, including the following aims, that London will:

- Have the best air quality of any major world city by 2050, going beyond legal requirements to protect human health and minimise inequalities;
- Be the first National Park City, where more than half of its area is green, where the natural environment is protected, and where the network of green infrastructure is managed to benefit all Londoners;
- Be a zero-carbon city by 2050, with energy efficient buildings, clean transport and clean energy;
- Be a zero-waste city where by 2026 no biodegradable or recyclable waste will be sent to landfill, and by 2030 65 per cent of London's municipal waste will be recycled;
- Be resilient to severe weather and longer-term climate change impacts including flooding, heat risk and drought;
- Reduce exposure to and adverse effects of noise and promote more tranquil spaces; and
- To transition to a low carbon circular economy.



Figure 11.1: Ladderswood regeneration scheme

11.2.6 In light of the government’s withdrawal of the Code for Sustainable Homes and the absorption of only part of this into Building Regulations, there is now a greater need than before for the Mayor and for local authorities to devise and refer to stronger policies and standards regarding environmental sustainability of development.

11.2.7 The Council is leading the way in these efforts by example, particularly through its planned development at Meridian Water, its Regeneration and Estate Renewal programme, which will help to regenerate and improve the environmental quality of local brownfield land, use sustainable building designs, processes and materials and connect to low carbon energy networks and transport options.

11.2.8 Reference to and active use of existing and emerging standards and assessments methods such as BREEAM, Home Quality Mark One (HQM1) and Environmental Impact Assessments (EIA) will be a key part of this, to ensure that development truly minimises negative and maximises positive environmental impacts, engenders positive environmental behaviour changes and actively contributes to climate change mitigation and adaptation. It is crucial that these are not undertaken as one-off ‘tick-boxing’ exercises but rather as integrated parts of the development and planning process, which remain relevant through regular updates and actively inform development design and construction.



Figure 11.2: Computer generated image of how Meridian Water could look like once complete



SUS1 Draft policy approach: Sustainable building

The Council will promote higher standards of environmental sustainability.

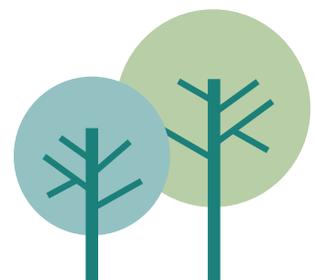
We will achieve this by:

- a) Taking into account London Plan policies on sustainable design and construction, transport and infrastructure. Civic buildings should particularly lead on all of these efforts and visibly demonstrate best practice; and
- b) Using certifications such as HQM1 or BREEAM to demonstrate high sustainable building standards.

We will expect development proposals to:

- Result in net gain to, or at minimum level no net loss of, local environmental quality, minimising harm and maximising positive impacts on the local natural environment and make the most efficient use of land;
- Address local and wider imbalances in the quality of and access to Enfield's natural environment assets and infrastructure;
- Minimise construction and operations waste, sourcing sustainable new materials and maximising reuse of recovered materials in line with circular economy principals, increasing recycling and promoting safe and efficient management of waste including hazardous waste;
- Use sustainable construction and demolition methods, assessing, monitoring, minimising and mitigating construction impacts. Dust and emissions monitoring and controls should be in line with the Mayor's SPG;
- Assess, protect and improve soil quality, avoiding and remediating contamination and taking into account a site's geological context to determine appropriate foundation depths, building height and design;

- Assess, protect and improve groundwater quality, particularly where it occurs within an Inner Source Protection Zone (SPZ1) or on sites where historic contamination is likely to present a significant risk to groundwater. In such locations, applicants are required to include a Preliminary Risk Assessment; and
- Submit a sustainable procurement, construction and performance plan and a S106 contribution to cover associated monitoring costs. This plan should demonstrate a strategy for and compliance with all of the above policies and include monitoring of development performance in construction as well as operation, to avoid discrepancies between design expectations and delivered performance and to support and promote sustainability through buildings' ongoing operation.



11.3 Sustainable living and working

11.3.1 Once a development is constructed, the design and substance of buildings and places continue to significantly influence how the development is used by those who live, work and spend their leisure hours there and their environmental impact. As more and more people live and work in and visit the borough, there is an increased need for planning to help create development which actively reduces each person’s environmental impact arising from their daily lives. The Council’s environmental priorities are improving air quality, reducing the borough’s carbon footprint and investing in renewable energy and recycling.

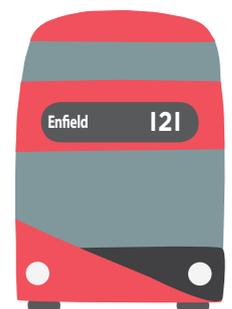
11.3.2 Air pollution is the single most deadly environmental factor Enfield residents are exposed to 5.4% of mortality in Enfield is attributable to outdoor air pollution, with biggest contributors being domestic carbon dioxide emissions followed by transport emissions. This is linked to cancer, asthma, strokes, heart disease, diabetes, obesity and dementia. Many of these conditions are also linked with inactivity and could be avoided or improved through changes to people’s lifestyles.

11.3.3 Exposure to poor air quality is mostly associated with long-term health conditions and premature mortality due to cardiopulmonary (heart and lung) effects. In the shorter-term, high pollution episodes can also trigger increased admissions to hospital and contribute to premature deaths of people vulnerable to daily changes in levels of air pollutants. Recent estimates indicate that poor air quality reduces the life expectancy of everyone in the UK by an average of 7-8 months. The House of Commons Environmental Audit Committee (EAC) further noted that the impact of air quality on life expectancy is considered greater than that from both road traffic accidents and passive smoking. In 2008, 4,000 premature deaths are estimated to have occurred in London from air pollution and 30,000 premature deaths were estimated across the whole of the UK. Negative effects of air pollution on the natural environment include direct effects of pollutants on vegetation as well as indirect effects on acid and nutrients in soils and water.

11.3.4 The causes of air pollution are varied but transport is its key source, responsible for 392.6 tonnes of carbon monoxide a year in the borough, with 5.4% of local mortality attributable to related air pollution and equally severe effects on local flora and fauna. Local level findings of the Council’s Air Quality Action Plan (AQAP) 2015 show that:

- Most of the air pollution in the Enfield AQMA is caused by road traffic and the one factor which would improve air quality the most is getting people to use their cars less;

Figure 11.3: Example of roof gardens above ground floor unit

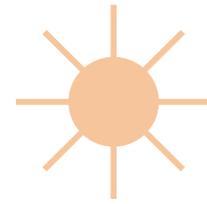




- Enfield's NO₂ annual mean objective is exceeded close to major and heavy traffic roads;
 - PM₁₀ predictions highlight exceedances of daily mean objective close to major roads;
 - Typically, roughly 60% of NO_x originates from local road transport and the remaining 40% from other background sources including domestic heating, commercial combustion and road transport from beyond the local area;
 - Contributions from car and HGV sources greatly dominate in all locations. Of the background pollution sources, it was noted that almost 50% of this was also from road transport; and
 - For PM₁₀ the background contribution greatly dominated even when compared with the all road transport total, although the most polluted locations were those most influenced by the contribution from road transport. The road sources of pollution were dominated by heavy duty vehicles, including buses and Heavy Goods Vehicles for all locations.
- 11.3.5 London wide studies also show that 25% of the capital's primary schools are in areas with dangerously high levels of air pollution and that primary school children are amongst the most vulnerable of the at-risk groups, as their lungs are still developing, and toxic air can stunt their growth, causing significant health problems in later life. Long-term exposure to air pollution also stunts children's lung development. In polluted areas of London, children's lungs have up to 10% lower capacity than usual.
- 11.3.6 Other negative effects associated with road traffic relate to lack of physical activity and associated bad health; road danger, which poses a disproportionately greater risk to children and associated to people living in areas of higher deprivation; noise; and community severance, especially in areas with larger faster roads. Without appropriate action, air quality will worsen, as dispersal of pollutants decreases with increases in heights and density of buildings and as more people travel around the borough.
- 11.3.7 Four air quality monitoring stations across the borough currently collect data to inform the Council's AQAP. Enfield is required to meet the legislation-based objectives for seven pollutants: lead, nitrogen dioxide, benzene, PM₁₀, carbon monoxide, sulphur dioxide and 1,3-butadiene. Enfield currently has multiple areas that exceed government objectives for nitrogen dioxide and PM₁₀ at busy roadside locations. As a result, the entire borough has been declared an Air Quality Management Area (AQMA). The Council submits annual reports to the Mayor on how it is meeting air quality objectives. Enfield's AQAP recommended measures to improve local air quality focus largely on transport, including encouraging walking, cycling and using public transport.
- 11.3.8 Enfield residents currently have a low average level of daily physical activity, compared to the national or London average as well as a high travel mode share of car use and one of the lowest cycling rates in London. Around 80% of car trips in Enfield are of cycle-able length yet less than 1% of total journeys are made by bike. Although these rates have started to show improvements since the start of the Cycle Enfield project, these shorter journeys on slow roads are disproportionate contributors to pollution. Pollution is also one of the key factor preventing residents from wanting to walking and cycling more, making air pollution key to improving the borough in more than one way. Although recent evidence suggests that concentrations of pollutants in the air inside a car are often higher than outside the car on the road.

Figure 11.4: Sunday bike ride





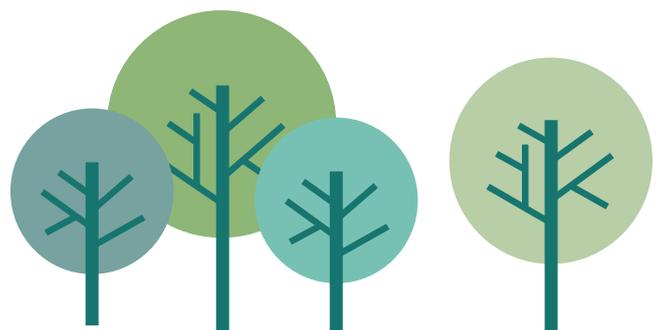
11.3.9 Enfield’s Joint Strategic Needs Assessment (JSNA) aims to provide robust evidence of health needs of Enfield’s population to improve health and wellbeing. One of its main elements is a focus on the Mayor’s Healthy Streets approach and the health impact of inactivity. In Enfield 60.1% of adults meet the recommended 150 minutes of physical activity a day, which is a lower proportion than the national or London wide average. Long-term conditions such as diabetes, arthritis and heart failure, which can be managed but not cured, account for 70% of the NHS’ budget but over 50% of these could be avoided through changes to people’s lifestyles. There is a strong evidence linking physical activity with reduced risk of obesity, type 2 diabetes, common mental disorders heart disease, dementia and some types of cancer. Active travel is one of the simplest ways to incorporate physical activity in a daily routine, making it crucial for new development to provide for and enable active travel.

11.3.10 However, considering the scale of the problem, it is evident that in addition to changing people’s travel behaviour, more decisive action will be required to combat air pollution in London on a larger scale, particularly from transport sources. This has recently been emphasised through court proceedings brought against the Government by Client Earth and by court rulings in other countries such as Germany, where cities have been granted the right to ban certain polluting vehicles. While the Council welcomes the Mayor’s Ultra Low Emissions Zone (ULEZ) in 2019, the Council maintains that ULEZ should be expanded to the whole of Greater London rather than only to inner London up to the A406 and wishes to promote more radical action to improve London’s air quality. The Mayor’s Air Quality Fund and the Mayor’s School Air Quality Audit Programme may also bring new funding options for suitable measures.

11.3.11 Carbon emissions are the second urgent environmental impact priority of the Council. In line with national and global targets, the Council has already met its previous carbon emission reduction target of 40% by 2020, as reductions of 45% were made between 2009 and 2017. Through its ‘Sustainable Enfield’ programme, the Council has set a new 60% carbon reduction target by 2025. Enfield’s Carbon Management Plan sets out the projects the Council is using to reduce the size of its own carbon footprint. The Council is committed that all new development makes similarly efforts to reduce the borough’s overall carbon footprint.

11.3.12 The two most pressing key issues relating to sustainable infrastructure and environmental impact to be addressed in the upcoming plan period to 2036 will be pollution, most importantly air quality, and carbon emissions. These both closely interrelate with issues and options on green infrastructure, transport and design in this draft new Local Plan.

11.3.13 The other two areas of corporate priority for the Council and reducing environmental impact are investment in renewable energy and increasing recycling. Both, together with sustainable water consumption, noise and light emissions, are related to the design of development as well as to the sustainable infrastructure underpinning it. Individual developments can particularly contribute to improving environmental impact on these fronts by being designed to minimise resource consumption, waste and nuisance.





SUS2 Draft policy approach: Sustainable living and working

The Council will aim to minimise environmental impact of developments through resource consumption and transport having regard to the Mayor's Environment Strategy and relevant London Plan policies.

We will achieve this by

- a) Monitoring and improving air quality and reducing congestion, with special focus on enabling use of sustainable and particularly active modes of transport, such as walking and cycling (see also transport policies); and
- b) Providing and improving supply of and access to appropriate green infrastructure (see also green infrastructure policies).

We will expect development proposals to:

- Incorporate appropriate transport management and where possible car free development, as well as appropriate green infrastructure, specifically to combat and reduce pollution and emissions from current levels. These factors need to be incorporated into the design of a development from the start and need to be discussed at pre-application stage for major developments;
- Actively promote and enable consumption of mains water to be limited to 105 litres per head per day or less, in line with the London Plan. Accreditations such as the European Water Label, appropriate parts of HQM1, BREEAM or other appropriate certifications through BRE can be used to demonstrate compliance. For commercial developments, a minimum of BREEAM excellent is required through the London Plan;

- Minimise energy demand and carbon emissions in new and refurbished buildings (see also design policies), having regard to London Plan policies and carbon targets. Energy credits as part of BREEAM rating are encouraged to be used to demonstrate compliance with carbon reduction targets. Major developments should be net zero carbon in line with the London Plan. A contribution towards offsetting any projected residual carbon emissions will be charged in line with up to date GLA's suggested carbon offset prices. Funds will be spent on increasing the energy efficiency and access to sustainable energy sources of existing building stock in the borough.
- Assess and mitigate proposals' contributions to local noise and light pollution, including submission of a light emissions map and acoustic survey. The Council will require mitigations measures where necessary.

11.4 Sustainable infrastructure

11.4.1 Sustainable infrastructure is required to underpin all development and a key factor in determining environmental impact. The Council’s three priorities for sustainable infrastructure as part of this plan are for it to help:

- Promote sustainable and reduced resource consumption;
- Minimise waste and promote recycling; and
- Improve connectivity.

11.4.2 Sustainable infrastructure for promoting sustainable and reduced resource consumption in Enfield relates primarily to energy, water and aggregates. The Council is particularly proud to be at the forefront of actively promoting local energy creation. Enfield is one of the first local authorities to establish its own energy company. ‘Energetik’ has four community energy networks at Meridian Water, Arnos Grove, Ponders End and Oakwood, which will supply low carbon heating and hot water to over 15,000 homes and businesses through a network of highly insulated pipes, using Scandinavian design standards to ensure greater energy efficiency and a fair price for consumers.

11.4.3 Importantly, the networks have been designed and are being built with the capacity to expand to supply low carbon heating and hot water to existing and new homes and businesses. CO2 emissions per head of population in the borough are now on a long-term downwards trend, falling from 6.0 tonnes in 2006 to 3.8 in 2016, in part due to the Council’s investment in low carbon energy.

11.4.4 Enfield Council’s Decentralised Energy Network (DEN) Technical Specification Supplementary Planning Document (SPD) (2015) provides more detailed technical design guidance relevant to commercial and residential developments, requiring them to connect to or contribute towards decentralised energy networks. The SPD aims to ensure that the design of any decentralised energy infrastructure will be high quality, efficient, have longevity, deliver the intended carbon emission reductions and ensure a fair price for consumers. The specification will be considered as part of assessing planning applications and is essential in supporting the delivery of decentralised energy networks within Enfield.

11.4.5 Enfield is also home to the Edmonton EcoPark whose Energy Centre generates electricity from residents’ household waste. It is the largest waste and recycling operation in north London and will soon replace its existing incinerator with a new energy from waste plant and state of the art Resource Recovery Centre. This will help generate energy from waste in a cleaner, more independent and affordable way to heat local homes and businesses, limit impacts on the surrounding community, encourage more sustainable waste management and boost associated job creation.



Figure 11.5: Energetik as seen within Ladderswood Estate’s energy centre

11.4.6 On the subject of water-related infrastructure, Thames Water's draft Water Resources Management Plan sets out projected needs for water from 2020 to 2100 and how Thames Water propose to meet these. The plan shows that without action, projected growth, combined with changes in the climate and a reduction in the water we can take from the environment, would create a deficit of more than 860 million litres of water a day for the Thames Water area. The plan also sets out proposed solutions to growing pressures on water supplies in the area.

11.4.7 In terms of sustainable infrastructure for the extraction of minerals, there are currently no primary land-won aggregates extracted in Enfield as workable land-based reserves are largely depleted. The King George reservoir was previously flagged as a potential source for aggregate extraction of sand and gravel and the Lea Valley is highlighted by the London Plan as a potential area for extraction. The Council will continue to engage with local land owners and the Lee Valley Park Authority to determine the acceptability of future aggregate extraction.

11.4.8 The second of the Council's priorities for sustainable infrastructure is for it to help minimise waste and promote recycling, which is crucial to minimising the borough's environmental impact. Enfield is currently finalising the North London Waste Plan (NLWP), together with the six other north London boroughs of Barnet, Camden, Hackney, Haringey, Islington and Waltham Forest.

11.4.9 The NLWP collects and provides evidence on local waste production and projects the area's capacity for processing this waste throughout the plan period. The plan also identifies adequate provision of land to manage any projected gaps in capacity and provides policies which ensure that future waste facilities maximise potential benefits, including on local job creation and training opportunities and minimise negative impacts such as on pollution. Policies also encourage a fairer, more even geographical spread of facilities throughout the area, an increase in rates of recycling and materials recovery, reduction in landfill, lowlandfill, low carbon energy generation, adherence to circular economy principals and achievement of net self-sufficiency in London waste processing in line with the London Plan.

Figure 11.6: Construction of Arnos Grove heat network Phase 1



- 11.4.10 The overall percentage of borough household waste being recycled is decreasing (from 39.1% in 2013-14 to 35.9% in 2015/16). In many other local authority areas, recycling rates are also plateauing around 38%. Recycling in flats is usually lower than in houses and flats, which will have an increased impact as the borough becomes more densely developed. Landfill sites are reaching capacity and there is increasing development pressure on waste sites as development land becomes more scarce.
- 11.4.11 The east of the borough has historically hosted a very large number of industrial uses including a number of waste facilities located in close proximity to one another. While these facilities provide important jobs and sustainable infrastructure to the borough and the wider north London area, as well as benefit from economies of scale and colocation, their high concentration and considerable land take, especially in areas of high deprivation, can also have negative cumulative impacts on the sustainable development of the local area, on its regeneration potential, on the availability of land for other employment uses and on equality across the borough in terms of access to and quality of local natural environment.
- 11.4.12 To minimise negative cumulative impacts from an extensive a concentration of waste processing facilities, the NLWP and Enfield's Local Plan will both seek a better future geographical spread of facilities with fewer new facilities concentrated in east of the borough. This will also help to reduce movement of waste from its source to its location of processing. The Council will however, continue to provide its share of current and potential future sites suitable for waste management in the NLWP area, to help ensure that sufficient capacity is available throughout the plan period.
- 11.4.13 Deephams Sewage Works, located in the eastern part of the borough, is instrumental to dealing with the Enfield and the wider area's waste water. The facility currently treats waste from around a million homes and businesses. The works are currently being upgraded, involving the replacement and modernisation of the entire wastewater treatment stream. This upgrade will help to meet more stringent Water Framework Directive discharge standards, replace existing assets that are nearing the end of their life, build capacity to cope with future population growth and climate change and improve efficiency. The upgraded plant will serve a population equivalent of 941,000, compared to 885,000 before work started. It will also significantly reduce environmental impact in terms of odour and water quality of the River Lee and Salmons Brook and create local jobs. Enfield, compared to other London boroughs, is therefore in a comparatively positive situation for waste water management because the upgrades to Deephams are very recent and extensive, allowing Thames Water to cater for the foreseeable needs in the area for the plan period.
- 11.4.14 The Council's priority for sustainable infrastructure to improve connectivity relates both to physical transport connectivity and to digital connectivity. Sustainable transport priorities and relevant policies are dealt with in more detail in the Local Plan's transport chapter. Priorities include are the routing of Crossrail 2 through the enhancement and Four-Tracking of the West Anglia Mainline (see Chapters 2 and 10), as well as promoting active modes of transport such as walking and cycling. To encourage greater use of active modes of transport, as part of the Mayor's Mini-Holland programme, Enfield was awarded a large-scale grant to improve the walking and cycling environment in the borough. One of the reasons Enfield was awarded this grant was that it currently has one of the lowest transport modal share for cycling in the capital, with only 4,8000 cycling journeys per year. Cycle Enfield hopes to increase this to 24,000 journeys.

11.4.15 The borough has already seen some decreases in numbers of journeys made by car, as well as increased use of walking and cycling and public transport. A recent report on the one-year findings from a longitudinal study of London ‘mini-Holland’ found a measurable and early impact on active travel behaviour and on perceptions of the local cycling environment. After one year, people living in parts of Waltham Forest, Enfield and Kingston which had seen mini Holland interventions were, on average, walking and cycling for 41 minutes a week more than those living in comparable outer London areas. The biggest increase in active travel came from people travelling on foot for an additional 32 minutes weekly on average, with nine more minutes by bicycle. Despite residents’ previous concerns, there was no evidence found that time spent in cars was increasing due to congestion nor that walking environments were becoming less attractive due to the introduction of cycle lanes. It also found positive changes to be consistent across demographic and socioeconomic groups. While these results are highly encouraging, there are still however significant further improvements that can be made in encouraging people in the borough out of their cars and into increased walking, cycling and public transport use.

11.4.16 The Council’s Digital Strategy is promoting smart city concepts and improving digital infrastructure, which will enable increased home working and reducing the need to travel, thus decreasing pollution and resource use, therefore forming a key part of Enfield’s sustainable infrastructure.

11.4.17 Enfield’s step-change in housing and employment growth will need to be accompanied and supported by relevant investment in sustainable infrastructure through relevant policies and initiatives of the Council as well as through cooperation with the NLWP and relevant Mayoral initiatives. This will help source resources in a sustainable way, reduce overall consumption of scarce resources, minimise waste, increase recycling, and improve physical and digital connectivity in the borough.

11.4.18 All of the plan’s requirements on development to help establish sufficient, up to date and fairly distributed sustainable infrastructure in Enfield will have to be tested through the Local Plan viability assessment.

11.4.19 Some sustainable infrastructure will be provided on site as part of new development and needs to be incorporated into site design and specifications. Other provisions will need to be made off-site and require connection and early cooperation with utility providers and other partners, as well as in some cases, developer contributions towards delivery. Enfield’s S106 SPD already sets out detailed relevant requirements of developer obligations and contributions, including on energy and water consumption, sustainable design and construction, sustainable energy generation including Decentralised Energy Networks (DEN) and carbon off-setting. Some of the standards and details will be updated over time as the new London Plan and new local plan for Enfield evolve, however the framework for obligations and contributions will remain relevant.

- Promote sustainable and reduced resource consumption;
- Minimise waste and promote recycling; and
- Improve connectivity.





SUS3 Draft policy approach: Sustainable infrastructure

The Council will work with its partners to promote sustainable and reduced resource consumption, minimise waste, and promote recycling, and improve connectivity.

We will expect development proposals to:

- a) Be supported by and connected to sufficient, up to date and distributed sustainable infrastructure for transport, waste, waste water and all relevant utilities;
- b) Provide access to high quality digital connectivity services from a range of providers, especially in areas of current deficiency, enable smart tech use, reduce the need to travel and support smart city concepts;
- c) Front-load engagement with relevant infrastructure providers for major applications;
- d) Help to connect to and, where appropriate deliver or improve sustainable water supply, drainage and sewerage infrastructure;
- e) Promote and provide facilities for recycling of waste generated in the construction and operation of the development and wherever possible, provide facilities for sorting recycling and recovered materials on site;
- f) Connect all units to, or contribute towards the delivery of existing or planned, low carbon local energy infrastructure in line with Enfield's SPD on Decentralised Energy Networks (DEN). Where there is no connection to a DEN available or planned within range, on-site CCHP or CHP will be expected where heating demand makes it feasible;
- g) Safeguard identified potential sources of aggregates in the borough where they are identified;
- h) Comply with the policies of the North London Waste Plan once adopted; and

i) Ensure that applications for waste management facilities and related development, including those replacing or expanding existing sites, will be required to demonstrate to the satisfaction of the Council:

- If the proposal is for a location near an existing waste facility, that no other suitable site was available which would help to promote a greater geographical spread and reduction in waste movement across the North London area;
- That there are no significant adverse effects resulting from cumulative impact of any proposed waste management development upon amenity, the economy, the natural and the built environment either in relation to the collective effect of different impacts of an individual proposal, or in relation to the effects of a number of waste developments occurring concurrently or successively; and
- That the scheme will provide job creation and social value benefits, including skills, training and apprenticeship opportunities and that in areas of high deprivation it will be expected that new employers show that wage levels offered match or exceed the London Living Wage.

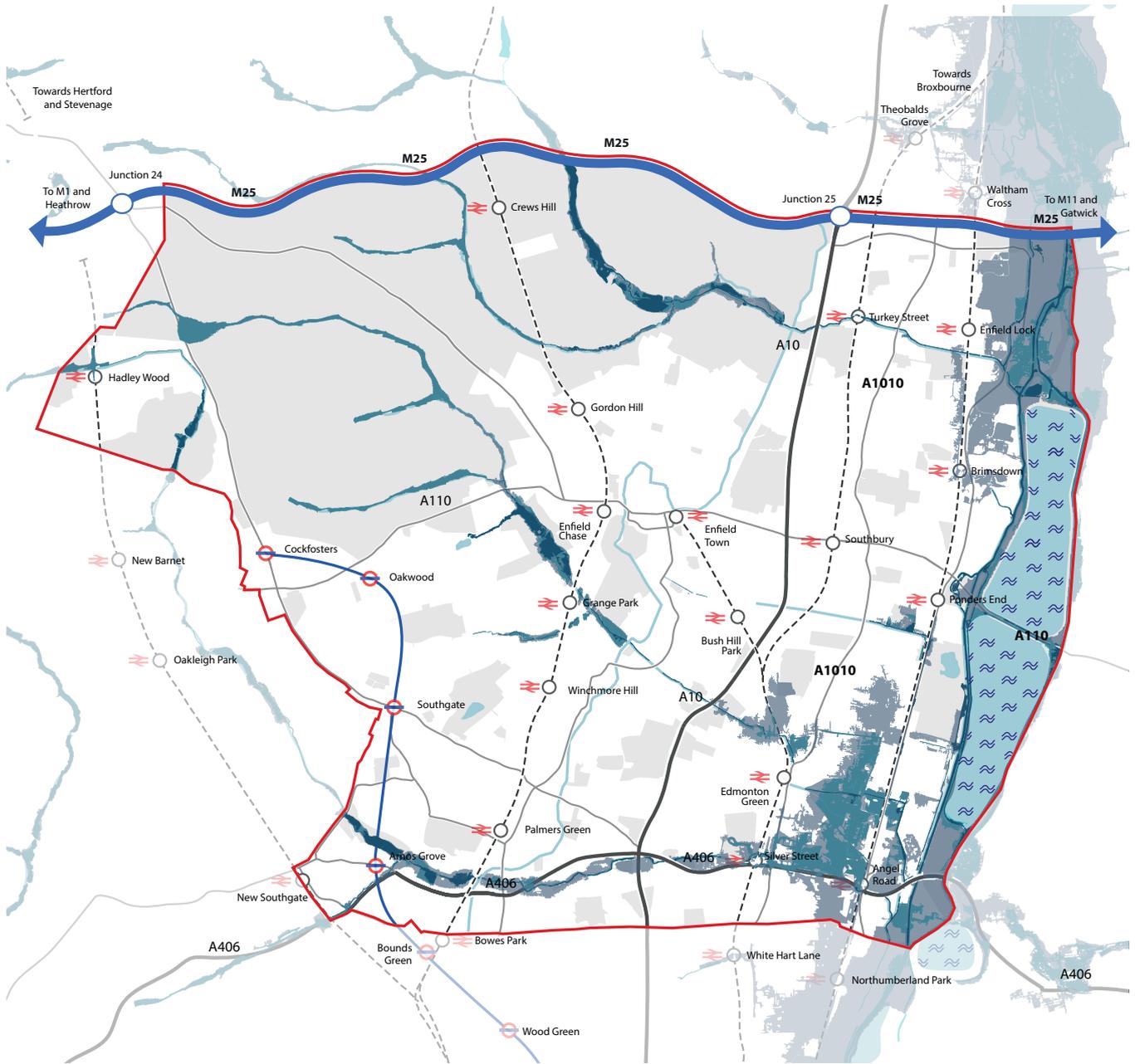


Figure 11.7: Areas at risk of flooding

Key

- Enfield borough boundary
- Railway
- Piccadilly line
- Main routes
- Open space
- Water body
- National Rail station
- London Underground station
- Flood Zone 2
- Flood Zone 3
- Flood Zone 3b

11.5 Water and flooding

11.5.1 Flood risk is recognised as a major issue for London. In Enfield, the main sources of flooding are from main rivers and surface water. Table 1 below and Figure 11.7 on the left shows the following Environmental Agency (EA) flood risk zones.

Table 1: Flood risk zones

Flood Zone 2	Medium Risk between 1 in 100 and 1 in 1,000 annual probability
Flood Zone 3a	High Risk 1 in 100 or greater annual probability
Flood Zone 3b	Functional Floodplain 1 in 20 greater annual probability

11.5.2 The actual extent of flooding from the river is mitigated by existing flood defences. Although these provide a high level of flood protection, Flood Risk Assessments (FRA) are required for all developments in Flood Zones 2 and 3 to assess the risk of flooding to the site, for example in the event of a failure or breach of the defences and to identify appropriate mitigation measures to be integrated to minimise the risk.

11.5.3 The history of development in the borough has meant that most growth areas fall within those higher risk zones i.e. the eastern corridor. Given the wide benefits of growth and development, the need to meet national and regional growth targets, confirmation that Local Planning Authorities must respond to the risks of flooding (i.e. NPPF and London Plan) and residents' concern around the frequency and severity of surface water flooding, the draft policy approach seeks to ensure that development of all scales and in all locations is contributing to an overall reduction in flood risk. This draft policy approach contributes to most plan objectives by reducing flood risk through new development to benefit the wider area. The avoidance of and minimisation of flooding is key to creating high quality places in which people feel safe and secure, and the requirements ensure run off is not harmful to or at the expense of the environment.

11.5.4 Climate change science means we know that rainfall and the likelihood of extreme weather events will increase, which in turns means that all scales of development can contribute to improved resilience. The need to improve surface water drainage and become more resilient to flood damage ties into wider resilience agendas and is important in an area with high levels of deprivation and rented accommodation, where individual and community wider resilience to withstand and recover from flood damage will be lacking.

11.5.5 To understand and respond to possible flood scenarios in Enfield, the Council will prepare a combined Surface Water Management Plan and Strategic Flood Risk Assessment (SWMP and SFRA) and will seek endorsement from the Environment Agency (EA). The underlying objective of the combined SWMP and SFRA is to provide a means for consistent consideration of flood risk across the borough and for the duration of this Plan.

11.5.6 Once endorsed, the combined SWMP and SFRA will provide mapping, definitions, flood defence and Sustainable Drainage Systems (SUDs) technique details, and information in regard to all sources of flooding. It should be used by developers to inform all site-specific flood risk assessments (FRAs). Use of the SWMP and SFRA will be essential to enable a strategic and proactive approach to be applied to flood risk management.

11.5.7 Design and construction choices should aim to reduce the exposure of all new development to flooding and improve its resilience, thereby reducing reliance on the long-term maintenance of flood defences. Specific expectations for the design and construction of development within Flood Zones 2 and 3 are set out in this draft policy approach, further context and guidance for these requirements will be set out in the combined SWMP and SFRA.

11.5.8 Development in the vicinity of rivers may affect the run off rates. In some cases, attenuation to greenfield runoff rates for lower order events (e.g. the 1 in 2-year event) can ensure water quality and other benefits are achieved, but for higher intensity events it may be preferable to discharge surface water runoff above greenfield runoff rates for some events so that water is released before the river peaks during a storm event. In this scenario, the developers must demonstrate that this is the most beneficial option in terms of flood risk using the best available modelled data, and the approach will need to be agreed with the Lead Local Flood Authority (LLFA).

11.5.9 Developments should be set back from watercourses, including ordinary watercourses are concerned, as a rule of thumb, the set-back should be at least 8m (unless agreed with the managing authority i.e. the EA, LLFA and Canals & River Trust). Where developments in close proximity to watercourses, these must also contribute to restoration and naturalisation of the river and maximise opportunities to enhance the floodplain using Natural Flood Management techniques.

11.5.10 Additionally, the loss of permeable ground surfaces that urbanisation typically brings means that we have seen a loss in the quantum of grassed areas as people pave over private gardens or minimise maintenance costs by using hardstanding ground surfaces. Given the frequency, severity, and concern over surface water flooding, the expectation that permeable surfaces will be used as far as possible (and specifically in private gardens and public spaces) will be applied throughout the borough.

Flood Risk Assessment

11.5.11 Site specific Flood Risk Assessment (FRAs) should assess all sources of flood risk both to and from the development and identify suitable flood risk management measures, including SuDS to ensure that occupants and vulnerable land uses remain safe throughout the lifetime of development, taking into account climate change.

11.5.12 In seeking to optimise the layout of development, FRAs should refer to the government's vulnerability classifications and flood zone compatibility guidelines in order to steer housing and other more vulnerable uses away from higher flood risk areas within the site.

11.5.13 Finally, FRAs should describe how any residual risks will be safely mitigated through appropriate flood resistance or resilience measures, having regard to the Council's SFRA Report and relevant government advice.

11.5.14 For more vulnerable developments in flood risk areas, an FRA should provide the necessary evidence to enable the Council to apply the 'sequential test' and, where no alternative sites are available in lower flood risk areas, assess whether the proposed development would pass the 'exception test'.

11.5.15 For residential buildings to be considered as 'safe', dry pedestrian access / egress and emergency vehicle access should be possible for the 1 in 100-year rainfall event including climate change.

11.5.16 Developers should agree the scope of the FRA in consultation with the Council and the LLFA from the earliest stages of project planning and design to ensure that appropriate flood risk management measures are included as part of the design and layout. Developers should refer to the EA's guidelines on 'Flood Risk Assessment for Planning Applications' or the EA's 'Standing Advice on Flood Risk Assessment' in cases where an FRA is not required, including for householder applications and minor non-residential extensions. The Council will consult the EA on all proposals accompanied by an FRA.

SUS4 Draft policy approach: Minimising flood risk

The Council will require developments to minimise current and future risk of flooding to people and property, taking into account climate change, without increasing flood risk elsewhere.

A site specific Flood Risk Assessment (FRA) will be required for the following development proposals:

- All proposals for developments in Flood Zones 2 and 3; and
- All proposals over 1ha in size in Flood Zone 1.

As part of the FRA, the requirements should be provided in line with national requirements and should be prepared in accordance with the Council's Strategic Flood Risk Assessment (SFRA) and Environmental Agency (EA) advice. Consultation and initial investigation should be commenced sufficiently early in the design and planning process so that all opportunities reduce flood risk can be identified and maximised. Where applicable, an exception test must also be carried out and included in the FRA.

The FRA must assess the risk of flooding from all relevant sources, and where there is a risk of flooding, appropriate flood proofing measures must be integrated, in line with the Council's SFRA and/or relevant guidance.

Applying 'sequential approach' to site layout by locating the most vulnerable development within areas of lowest flood risk, where possible.

Developments adjoining watercourses should be set-back by at least 8m from the banks, unless otherwise agreed with the managing authority, EA, LLFA and the Canals and Rivers Trust – to allow improvements and maintenance of land drainage, improve ecological functioning of river corridors and enhance local amenity.

Developments close to watercourses must contribute to restoration and naturalisation of the river and maximise opportunities to enhance the floodplain using flood management techniques.

Figure 11.8: A series of enhanced public spaces were created as part of the Cycle Enfield scheme. Different raingardens were incorporated into the works at Green Lanes (below) to make the area more pedestrian-friendly





11.6 Managing surface water

11.6.1 New arrangements for Sustainable Drainage Systems (SuDS) were introduced by the Government in April 2015. The responsibility for approving and securing the implementation of SuDS proposed as part of major applications remains with the local planning authority. Therefore, when planning for SuDS, developers should enter into pre-application discussions with the Council from the earliest stages of project planning and design in order to optimise the performance and benefits of the proposed SuDS strategy as an integral part of the design and layout.

11.6.2 The wider use of SUDs measures is considered a priority in order to deliver a step-change in drainage capacity across the borough. The benefits of SUDs are highlighted in the box, below.

Benefits of SUDs

Improves public health and wellbeing

Increases amenity space

Creates aesthetic improvements

Improves air quality

Reduces urban heat island effect

Enhances wildlife habitat for biodiversity

Reduces flood risk

Filters pollution and improves water quality

11.6.3 SUDS include a range of natural drainage techniques designed to reduce the rate and volume of run off from new and existing developments by managing surface water as close to its source as possible. SUDS measures work by mimicking natural drainage processes as far as possible by allowing water to soak into the ground (i.e. infiltration), storing run-off and releasing it slowly (i.e. attenuation), slowly transporting water to the surface (i.e. conveyance), removing pollutants and enabling water to be transpired from plants.

11.6.4 The use of infiltration SuDS, such as permeable paving, gravel, soakaways, filter strips, swales, rain gardens and other landscaped areas, rely on discharges to the ground and are therefore affected by the permeability of soils and geology, the groundwater table and the presence of underlying aquifers. Where ground conditions are not suitable for infiltration, attenuation SuDS should be used, such as green roofs, rainwater harvesting, basins, ponds, wetlands, and storage tanks.

11.6.5 All developments, including minor proposals will be expected to show that they have managed surface water by utilising all available techniques to avoid increasing runoff and to reduce it as far as possible. This could include a combination of options including, but not necessarily limited to, the provision of water butts and rainwater harvesting systems, maximising areas of permeable surfaces and using green walls, green or brown roofs, or integrating water features. Where above ground SuDS measures are not feasible it may be necessary to use underground attenuation tanks and flow control mechanisms to manage run off.

Figure 11.9: Traffic calming scheme incorporating raingardens, Alma Road

- 11.6.6 As highlighted in the previous section, SuDS measures detailed in the FRA must clearly demonstrate how they will achieve the required attenuation of peak surface water run-off, in line with the Mayor's Drainage Hierarchy in order to minimise run-off and achieve greenfield run-off rates where necessary. An on-going maintenance programme must also be included for implementation to ensure the effectiveness of the system for the lifetime of the development.
- 11.6.7 The inclusion of rainwater harvesting systems must be considered as a way of helping to reduce runoff while also reducing potable water usage within developments. To help minimise run-off from new areas of hard standing, including car parks, these must be designed to be permeable and allow infiltration of surface water with no run-off being directed to the sewer system (unless there are practical reasons for this not being possible – i.e. unsuitable underlying soils).
- 11.6.8 Importantly, tree and shrub planting can significantly reduce the likelihood of surface water flooding by slowing the rate at which rainfall reaches the ground and increasing infiltration. Landscaping schemes associated with major and minor schemes will be expected to minimise the use of impermeable surfaces, whilst maximise use of permeable materials. When combined with other SuDS measures, tree planting has many benefits for people and wildlife, not only in terms of reducing flood risk, but for air and water quality, urban cooling, habitat creation and for local amenity. Further guidance on SuDS in terms of design and evaluation can be found on the Council's website: <http://online.flipbuilder.com/mccloy.consulting/ftyi/mobile/index.html>



The Mayor's Drainage Hierarchy

- 1) Store rainwater for later use
- 2) Use infiltration techniques and green roofs
- 3) Attenuate rainwater in open water features such as in ponds for gradual release
- 4) Attenuate rainwater by storing in tanks or sealed water features for gradual release
- 5) Discharge rainwater direct to a watercourse
- 6) Discharge rainwater to a surface water sewer or drain
- 7) Attenuate rainwater below ground
- 8) Rainwater discharge to a combined sewer.

SUS5 Draft policy approach: Surface water management

All proposals for development must manage surface water run-off as close to its source as possible and on the surface where practicable, in line with the London Plan’s Drainage Hierarchy.

The Council will expect:

- All major developments to implement Sustainable Drainage Systems (SuDS) to enable a reduction in peak run-off to greenfield run-off rates in the 1 in 100-year event (plus climate change allowance);
- All major developments to provide a sustainable drainage strategy that demonstrates how SuDS will be integrated to reduce peak flow volumes and rates in line with the requirements of this draft policy approach;
- All other developments to maximise attenuation levels and achieve greenfield run-off rates where possible or increase the site’s impermeable area;
- Development to be designed to minimise flood risk and include surface water drainage measures to be designed and implemented where possible to help deliver other Local Plan policies such as those on biodiversity, amenity and recreation, water efficiency and quality, and safe environments for pedestrian and cyclists;
- All new outdoor car parking areas and other hard standing surfaces be designed to be rainwater permeable with no run-off being directed into the sewer system, unless there are practical reasons for not doing so;
- Living roofs to be incorporated into new development, where possible to help contribute to reducing surface water run-off; and

- Where installed, SuDS measures be retained and maintained for the lifetime of the development and details of their planned maintenance must be provided to the Council.

Figure 11.10: Bulmer Road





This is not the final word

Thank you for taking the time to read our Issues and Options consultation document towards a new Enfield Local Plan to 2036.

This plan is not the final word. Detailed policies to implement “good growth” to 2036 will still need to be drafted. However, before this happens, we need to get the overall approach right. This needs to ensure that new development maximises benefits for everyone across the borough.

This consultation is your chance to help the Council get it right. Please get in touch and have your say in shaping the future of our borough.

You can...

...provide your comments online using www.enfield.gov.uk/plan1

or

...e-mail us at: localplan@enfield.gov.uk

or

...complete the consultation response form and return it to:

Strategic Planning and Design

Enfield Council

FREEPOST

NW5036

EN1 3BR

The deadline for all responses is **5pm on Thursday 28th February 2019.**

Thank you!

