
Report to the Council of the London Borough of Enfield

by Matthew Nunn BA BPL LLB LLM BCL MRTPI

an Inspector appointed by the Secretary of State for Communities and Local Government

Date 1st March 2016

PLANNING AND COMPULSORY PURCHASE ACT 2004 (AS AMENDED)

SECTION 20

**REPORT ON THE EXAMINATION OF
THE NORTH EAST ENFIELD AREA ACTION PLAN**

Document submitted for examination on 23 October 2014

Examination hearings held between 28 and 30 April 2015

File Ref: PINS/Q5300/429/9

Abbreviations Used in this Report

AA	Appropriate Assessment
AAP	Area Action Plan
CS	Core Strategy
LDS	Local Development Scheme
LSIS	Locally Significant Industrial Site
MM	Main Modification
NEEAAP	North East Enfield Area Action Plan
NGAP	Northern Gateway Access Package
NGAR	Northern Gateway Access Road
SA	Sustainability Appraisal
SAC	Special Area of Conservation
SCI	Statement of Community Involvement
SHMA	Strategic Housing Market Assessment
SIL	Strategic Industrial Location
SSSI	Site of Special Scientific Interest

Non-Technical Summary

This report concludes that the North East Enfield Area Action Plan provides an appropriate basis for the planning of this part of the Borough providing a number of modifications are made to the Plan. The Council has specifically requested me to recommend any modifications necessary to enable the Plan to be adopted.

All of the main modifications were proposed by the Council and I have recommended their inclusion after considering the representations from other parties on them.

The Main Modifications can be summarised as follows:

- Greater emphasis to be given to the historic environment and heritage assets, including conservation areas and listed buildings, so as to comply with national policy;
- Reformulation of the Council's approach in respect of the Northern Gateway Access Package to reflect a 'sequential approach' to transport options, in order to reflect national policy, including the removal of specific references to the Northern Gateway Access Road;
- Additional references to the 'Crossrail 2' project, given its potential to balance the transport system towards more sustainable modes, increase travel choice, and support regeneration;
- Changes to ensure a more proactive approach is taken towards ameliorating any adverse effects resulting from the West Anglia Enhancement Project;
- Changes to take account of viability and operational requirements within employment and industrial areas;
- Emphasising the importance of the Lee Valley Regional Park to the Plan area;
- Highlighting areas liable to flooding, including requiring any future proposals to address flood risk.

Introduction

1. This report contains my assessment of the North East Enfield Area Action Plan (NEEAAP) in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004 (as amended). It considers first whether the Plan's preparation has complied with the duty to co-operate, in recognition that there is no scope to remedy any failure in that regard. It then considers whether the Plan is sound and whether it is compliant with the legal requirements. The National Planning Policy Framework ('The Framework') at paragraph 182 makes clear that to be sound, a Local Plan should be positively prepared; justified; effective and consistent with national policy.
2. The starting point for the examination is the assumption that the local authority has submitted what it considers to be a sound Plan. The basis for my examination is the Proposed Submission NEEAAP (April 2014) [NEEAAP-01]. Following the hearings, a schedule of 'Proposed Main Modifications' [ED 033] was subject to public consultation for six weeks. This included changes proposed by the Council in the Addendum of Focused Changes – Submission Stage (October 2014) [NEEAAP-08], as well as the additional Addendum of Further Focused Changes (April 2015) [ED 023] produced shortly before the hearings. I have taken into account the Schedule of Representations and the Council's responses [ED 034] in reaching my conclusions.
3. The Main Modifications that are necessary for soundness all relate to matters that were discussed at the examination hearings. My report only deals with the Main Modifications that are needed to make the Plan sound and legally compliant. They are identified in bold in the report as follows: '**MM**'. Because of the structure of the Plan, references to certain MMs may appear more than once in this report. In accordance with section 20(7C) of the 2004 Act, the Council requested by letter [ED-033] that I should make any modifications needed to rectify matters that make the Plan unsound and thus incapable of being adopted. These Main Modifications are set out in the attached Appendix to this report.

Assessment of Duty to Co-operate

4. Section 20(5)(c) of the 2004 Act requires that I consider whether the Council complied with any duty imposed on it by section 33A of the 2004 Act in relation to the Plan's preparation. The Council prepared a statement on the Duty to Co-operate [NEEAAP-06] detailing how it had engaged with other bodies including neighbouring local authorities in the preparation of the Plan. In the light of concerns raised by certain participants, including amongst others, Epping Forest District Council and Waltham Abbey Town Council, I sought further information on this duty by letter [ED 001]. The Council's response [ED 002] provided further detailed clarification and explanation. By the end of the examination hearings, and as a result of various modifications suggested by the Council, the compliance with the Duty to Co-operate was no longer a controversial matter. Overall, on the basis of the information received, I am satisfied that the Council has engaged constructively, actively and on an ongoing basis with the relevant bodies to prepare the Plan. I therefore conclude that the Duty to Co-operate has been met.

Assessment of Soundness

Preamble

5. The NEEAAP sets out an overall vision for the future of the north east Enfield area. The Plan covers an extensive and varied tract of the Borough, stretching from Ponders End in the south to the M25 in the north, and includes important industrial land, various local centres, residential areas, conservation areas and open spaces including part of the Lee Valley Regional Park.
6. The NEEAPP is intended to be read alongside The Enfield Plan: Core Strategy 2010-2025, adopted in November 2010 ('The Core Strategy') [EBD-02]. This provides the broad strategy for the scale and distribution of development and supporting infrastructure. It contains Core Policies for guiding patterns of development and provides the strategic direction for North East Enfield as a strategic growth area, and Ponders End as a regeneration priority area. Of particular relevance to the NEEAAP are Core Policy 40, dealing with North East Enfield, and Core Policy 41 dealing with Ponders End, along with other Core Strategy Policies. The Plan should also be read in conjunction with the Development Management Document, adopted in November 2014, which provides detailed policies for dealing with planning applications.

Main Issues

7. Taking account of all the representations, written evidence and the discussions that took place at the examination hearings, I have identified nine main issues upon which the soundness of the Plan depends.

Issue 1 – Vision and Objectives

Whether the Vision and NEEAAP Objectives are justified, effective and in accordance with national policy

8. The overall vision is to make North East Enfield a place where people aspire to live, work, visit and invest. Five broad objectives are identified, with detailed aims within each. The objectives comprise: (1) long term coordinated planning for growth; (2) sustainable neighbourhoods; (3) employment growth and the local economy; (4) maximising value of natural assets; and (5) infrastructure investment.
9. There are certain tensions between Objective 4: 'maximising value of natural assets' and Objective 5: 'infrastructure investment'; in particular, between ensuring the local area's biodiversity is protected, as against the Plan's support for exploring the possibility of direct access to the M25 motorway via a new link road. To address this and to ensure coherence, the approach in respect of the Northern Gateway Access Package, and specifically the Access Road should be changed. Specific references to the latter should be deleted as proposed by the Council. As a result, changes are required to the wording in Chapter 2 (**MM3** & **MM4**), as well as to Chapter 3 (**MM5**, **MM6**, and **MM7**). I deal with the issue of the Northern Gateway Access Package fully below under Issue 2 –'Movement'.

10. The Plan, in Chapter 2, also fails to give sufficient positive emphasis to the historic environment and heritage assets such as conservation areas and listed buildings, and is not consistent with national policy in this respect. The proposed new wording in **MM1** would rectify this, and the changes proposed by **MM2** would provide the necessary context on tall buildings and key views.
11. In combination, these modifications would ensure Chapter 2 and Chapter 3, including the Vision and Objectives are justified, effective and in accordance with national policy. The changes are necessary for the soundness of the plan.

Issue 2 – Movement

Whether the fourteen Policies (4.1 to 4.14) relating to movement are justified, effective and in accordance with national policy

Northern Gateway Access Package (Policy 4.3)

12. The Northern Gateway Access Package includes a series of different measures aimed at improving transport and accessibility, as well as encouraging a shift towards more sustainable means of travel. One aspect which materially affects the soundness of the plan, and raised considerable concern from participants involved the possible provision of a link road between A1055 and A121 in order to connect to Junction 26 of the M25 Motorway. This link is known as the Northern Gateway Access Road. The Council originally justified its approach saying that the link road was simply one of many potential options that could form part of the overall Northern Gateway Access Package.
13. However, I consider there was insufficient explanation or justification of the proposal in the Plan. It was unclear how the concerns identified by a previous Inspector at a Public Inquiry in 2001 (APP/V4630/V/01/1075981) had been overcome. In that earlier case, the Secretary of State accepted the Inspector's recommendation, and refused permission for a link road in July 2002. Nor was it clear how the inclusion of the link road would necessarily achieve a shift from less sustainable means of transport or promote low carbon living. This is contrary to both the Plan's own objectives, as well as those of the Framework.
14. I also share participants' concerns that the possible impacts of the link road on the Green Belt, Rammey Marsh and Epping Forest Special Area of Conservation (SAC) and Site of Special Scientific Interest (SSSI) had not been comprehensively assessed. Also problematic is that the specific reference to the link road could be interpreted as giving more attention or emphasis to one potential component of the overall Northern Gateway Access Package than was the intention, at the expense of other important aspects.
15. Following consultation and engagement with various stakeholders, and shortly before the examination hearings, the Council proposed that all specific references to the Northern Gateway Access Road be deleted from the NEEAP, and that instead, reference be made to a 'sequential approach' to the selection of transport options, starting with measures to encourage a shift towards non-car modes, then local traffic measures, and finally upgrading the highway network. This approach would ensure that the Council would only consider additional highway infrastructure if other more sustainable options

were exhausted. This would be consistent with advice within Part 4 of the Framework. The modifications outlined in **MM3, MM4, MM5, MM6, MM7, MM8, MM9, MM10** relating to Chapters 2, 3 and 4 would achieve this reformulation and are essential to the Plan's soundness. **MM22** relates to the Glossary and redefines the Northern Gateway Access Package to reflect the above changes.

16. Turning to other transport matters, 'Crossrail 2' is a proposed new railway that would link London and the wider south east. The project is aimed at significantly enhancing the frequency and quality of rail services, improving connectivity, reducing journey times, as well as supporting economic regeneration through the provision of new infrastructure. 'Crossrail 2' cannot be built until formal consent is received from the Government, funds secured and the necessary land acquired. The process of applying for consent will involve a public examination of the scheme and consideration of objections before any decision can be made.
17. Nonetheless, the effectiveness of the Plan would be jeopardised if additional and strengthened references to the 'Crossrail 2' project were omitted. These should emphasise the support for the delivery of the project and the intention to work with relevant stakeholders. The modifications outlined in **MM3, MM4, MM5, MM6, MM8, MM9, MM10** are therefore necessary for soundness.

West Anglia Enhancement Project (Policy 4.4)

18. As part of Northern Gateway Access Package, the Council supports the proposed capacity enhancement of the West Anglia Mainline. It will significantly improve the frequency of train services in North East Enfield. However, this may have adverse effects in terms of east-west accessibility and connectivity in North East Enfield, particularly if level crossings are closed at Brimsdown and Enfield Lock.
19. Planning often has to balance conflicting demands and Policy 4.4 commits the Council to working with relevant bodies to ensure adequate alternative arrangements are provided. Policy 4.5 states that a scheme should be developed for improving the route for pedestrians and cyclists after the closure of the crossing. The changes proposed by **MM11** would ensure that a more proactive approach is taken to any adverse impacts by including a reference to vehicles and requiring a scheme to be developed prior to any closure of the level crossing at Enfield Lock. This change is required for soundness.

Issue 3 - Housing

Whether the three Policies (5.1 to 5.3) relating to housing are justified, effective and in accordance with national policy

20. The Core Strategy (specifically Policy 2 and Policy 40) provides for 1000 units in the NEEAAP area. However, the NEEAAP identifies that approximately 550 units will be delivered in the plan period (Table 5.1, page 72), around 450 units less than the supply identified in the Core Strategy. This is largely the result of changing circumstances at two key sites. At the former Middlesex University Site at Ponders End, around half the site has been taken for use as a Free School. At South Brimsdown, the site is being redeveloped for

industrial and employment use, as it was found not to be viable for residential development.

21. However, as explained at the examination hearings and in the Council's document ED-030, some of these losses can be offset by increased capacity at other sites within the NEEAAP area. Also, other significant sites outside the NEEAAP area, but within the Borough, have also come forward, including at the former Middlesex University Campus at Cat Hill, at Carterhatch Lane Depot, Chase Farm Hospital, and the Council Estate renewal at New Avenue. Together, these sites would provide around 795 additional units which would comfortably offset the loss of 450 units within the NEEAAP area. In addition, the Council has referred to 'Meridian Water', a very significant project which is projected to bring forward a minimum of 5,000 new units, with a further 3,000 units in the wider Edmonton area.
22. I also understand that the Council has now started work on its new Local Plan (Core Strategy) Review. This will take account of demographic changes within the Borough, as well as new London Plan housing targets. Key studies are currently being undertaken including a Strategic Housing Market Assessment (SHMA) and Town Centre and Retail Study. As part of its work on the Local Plan (Core Strategy) Review, the Council is undertaking a 'call for sites', which will feed into the revised Plan, scheduled for adoption in 2017. The Council is also developing 'Strategic Growth Scenarios', which will consider locations for growth, having regard to potential transport improvements resulting from the West Anglian Mainline Enhancement route, and Crossrail 2.
23. Enfield's overall housing target is borough-wide, rather than area specific. It is also the case that the Core Strategy was adopted some years ago in 2010. Consequently, it is inevitable that certain of the area based targets within the Core Strategy may require adjustment given changing and unavoidable circumstances at individual sites, as has happened here. Nevertheless, the delivery of housing remains a key component of the plan. I am satisfied that the lower housing capacity at certain sites does not undermine the overall effectiveness of the Plan or make it unsound.
24. In relation to affordable housing, Policy 5.1 allows for a more generous split between social rented housing and intermediate housing than the Core Strategy. Policy 3 of the Core Strategy seeks a 40% target of affordable housing on sites capable of accommodating 10 or more dwellings. It identifies a borough-wide affordable tenure mix of 70% social rented and 30% intermediate. In contrast, Policy 5.1 of the NEEAAP requires 60% social rented and affordable rent, and 40% intermediate.
25. I accept that Policy 5.1 of the NEEAAP provides greater flexibility in recognition that viability is more challenging in the eastern part of the Borough, as evidenced in the Council's Community Infrastructure Levy: Draft Charging Schedule [EBD-07]. This Schedule has, following an examination, recently been found to provide an appropriate basis for the collection of the levy. The approach in Policy 5.1 is also entirely consistent with the Council's Development Management Document, at Page 17, Paragraph 4.1.5. Given all of these considerations, I am satisfied that the difference in approach in

Policy 5.1, compared with the Core Strategy, does not make the policy unsound.

26. To sum up on housing policies overall, notwithstanding the reduction in housing capacity at certain sites within the NEEAAP area, there are other sites coming forward within that area, as well as across the Borough as a whole. I am satisfied that, taken together, the policies relating to housing are justified, effective and in accordance with national policy. Therefore, I find this section of the Plan to be sound.

Issue 4 – Employment and Retail Parks

Whether the three Policies (6.1 to 6.3) relating to employment and retail parks are justified, effective and in accordance with national policy

27. Policy 6.1 is concerned with improving existing industrial areas, and ensuring that such areas keep pace with the demands of businesses. The Policy states that new industrial development or redevelopment will be permitted in the industrial areas identified as Strategic Industrial Locations (SILs) and Locally Significant Industrial Sites (LSISs). The Policy sets out the principles to be applied, including improving the access and the environmental quality of industrial estates. **MM12** is required to add text to explain that, in applying these principles, regard should also be had to viability and operational requirements. This would ensure that the Policy is not unreasonably restrictive or prescriptive, and that the approach is consistent with supporting growth in the local and wider economy, as required by the Framework. It would also accord with the approach of Policy DMD 39 in the Development Management Document relating to the Design of Business Premises. With this modification, I find this section of the Plan to be sound.

Issue 5 – Community Facilities and Services

Whether Policy 7.1 relating to community facilities and services is justified, effective and in accordance with national policy

28. Policy 7.1 is concerned with ensuring the adequate provision of community facilities, including health facilities and education, to support the existing and future population of North East Enfield. Paragraphs 7.1.2 to 7.1.4, dealing with primary and secondary school education, only refer to the period up to 2018, whereas the NEEAAP has a much longer timescale. However, the Council has confirmed that additional primary school places will not be required until at least 2021, or 2023, if there is an expansion of an existing school within the area. The proposed ARK North Enfield Academy will also deliver more than enough capacity for secondary school spaces to 2023. The Council has also confirmed that overall infrastructure provision will be considered as part of the borough-wide Local Plan (Core Strategy) review. Overall, I am satisfied that this aspect of the Plan is sound.

Issue 6: Green Network and Food Growing

Whether the Policies (8.1 to 8.4) relating to the 'Green Network' and food growing are justified, effective and in accordance with national policy

29. The overall policy approach is to ensure that there is a network of well connected open spaces within the NEEAAP area. The Lee Valley Regional Park serves regional and local needs, with smaller local and 'pocket' parks and children's play areas serving local needs. The Northern Gateway Access Road would potentially compromise the Green Network, given that its route would impinge on designated open space. However, the modifications recommended in MM4 to MM10, in relation to Northern Gateway Access Package, proposing a sequential approach to transport options, would deal with this issue.
30. The Plan's effectiveness depends on the recognition of the importance of the Lee Valley Regional Park to the NEEAAP area. The changes recommended in **MM13** include new references to the Lee Valley Regional Park Development Framework, which sets out the Lee Valley Regional Park Authority's vision, proposals and policies. This document itself informed the preparation of the NEEAAP. The modification also refers to Core Policy 35 of the Core Strategy which confirms the intention to support the work of key stakeholders in improving access to the Park and realising its potential. References to waterways, which are an intrinsic element of the area, are also now proposed. Policy 8.3, concerned with creating strategic green corridors, is amended to include reference to the River Lee Navigation. Together, these changes reinforce the value of the Park, as well as the waterways, as a unique recreational resource, and are essential for the Plan's soundness.

Issue 7: Sustainable Energy

Whether Policy 9.1 relating to Sustainable Energy is justified, effective and in accordance with national policy

31. Policy 9.1 seeks a coordinated approach to sustainable energy, including energy efficiency measures, decentralised energy systems, and renewable energy technologies. There is no need for the Policy to re-iterate the requirements set out in the energy policies of the Development Management Document, for example Policy DMD 52, since the approach of Chapter 9 is to focus on area-specific issues, such as the Lee Valley Heat Network, and the encouragement to develop Enfield Power Station as a Combined Heat and Power Plant (CHP). The Council approved the Lee Valley Heat Network Business Plan in 2014, and has set aside financial resources for its development. Although ambitious, the Council considers this scheme to be deliverable. Overall, I am satisfied the Plan tackles sustainable energy in a positive fashion and consistently with national planning policy. It would accord with the approach outlined in the Framework to support the transition to a low carbon future. This chapter of the Plan is sound.

Issue 8: Character Areas and Proposal Site Policies

Whether the sixteen Proposal Site Policies (10.1-19.2) are justified, effective, and in accordance with national policy

32. Part C of the Plan contains 10 individual chapters with Policies to support and improve specific areas within the NEEAAP area. Ponders End Waterfront is described by the Council as 'a hidden gem'. The changes proposed by **MM14** in relation to Policy 12.1 would give a more positive emphasis to its historic character and waterfront setting. It would require proposals to respond to heritage assets such as Ponders End Flour Mill Conservation Area and the setting of listed buildings in line with national policy. **MM15** would add text to explain that, in applying these principles, regard should also be had to viability and operational requirements. This is required to reflect the emphasis in the Framework on supporting economic growth. **MM16** would add some flexibility to Figure 12.2, indicating the diagram is illustrative rather than prescriptive. This is necessary to accord with the Framework's recognition that plans and policies should be flexible enough to respond to changing circumstances.
33. Policy 14.2 deals with the redevelopment of the Co-operative Site within the Enfield Wash Local Centre, at the Unity Road / Hertford Road junction. However, this policy would allow insufficient flexibility in terms of the possible range of uses and so would not accord with a core planning principle of the Framework to promote mixed use developments. **MM17** would address this defect by referring to a range of uses, such as residential, offices and community uses.
34. Chapter 18 deals with the Enfield Lock Conservation Area, which includes the Lee Navigation, the listed terraced houses known as 'Government Row', the British Waterways Depot and offices, and adjoining meadows. The lock itself forms the heart of the area. The area is liable to flooding, and **MM18** proposes additional text to Paragraph 18.1.3 to make clear that any future development will need to address flood risk in line with higher level policy requirements. In addition, **MM19** would add the flood risk area to Figure 18.1. These changes are both necessary to ensure effectiveness and I recommend them on this basis.
35. Chapter 19 deals with Brimsdown Station Area. This includes a cluster of retail and other uses, where Green Street traverses the railway line at a level crossing. Policies 19.1 and 19.2 deal with the development of the area over the short and longer term respectively. The longer term deals with the scenario were the level crossing to close as a result of the West Anglia Enhancement Project. These policies omit references to flooding, but this would be remedied by **MM20** and **MM21**. Subject to these changes, the Chapter is sound.

Issue 9: Delivery and Implementation

Whether the measures to ensure the delivery and implementation of the Plan are justified, effective and in accordance with national policy

36. Chapter 20 of the Plan deals with delivery and implementation. The NEEAAP sets out a range of projects and initiatives, from low key interventions to major projects. Within the Chapter, projects are prioritised as follows: enabling projects and 'early wins'; short term; medium term; and long term projects. The Chapter provides details of governance, partnership working, and funding sources. Paragraph 20.6.3 makes it clear the Council will prepare an annual Monitoring Report on the NEEAAP that will assess the extent to which its policies are being implemented; and will also set out, where a policy is not being implemented, the reasons why, and what steps are needed to ensure that it is implemented. Overall, I am satisfied that this section of the Plan will be effective in monitoring and ensuring the delivery of the Plan.

Assessment of Legal Compliance

37. My examination of the compliance of the Plan with the legal requirements is summarised in the table below. I conclude that the Plan meets them all.

LEGAL REQUIREMENTS	
Local Development Scheme (LDS)	The NEEAAP is identified within the approved LDS (2013-2016), published September 2013 [EBD-06] and its content complies with the LDS. It has therefore been prepared in accordance with it.
Statement of Community Involvement (SCI) and relevant regulations	The SCI [EBD-03] was adopted in June 2006 and consultation has been compliant with the requirements therein, including the consultation on the post-submission proposed Main Modifications (MMs).
Sustainability Appraisal (SA)	SA has been carried out and is adequate.
Appropriate Assessment (AA)	A Habitats Regulations Assessment, dated April 2014 [NEEAAP-07] was carried out. This concludes that all likely significant effects on European Sites have been avoided. Natural England has confirmed that the Council's approach is justified.
National Policy	Provided the recommended modifications are made, the NEEAAP complies with national policy.
2004 Act (as amended) and 2012 Regulations.	The NEEAAP complies with the Act and the Regulations.

Overall Conclusion and Recommendation

38. **The Plan has a number of deficiencies in relation to soundness which I have explained in my report which means that I recommend non-adoption of it as submitted, in accordance with Section 20(7A) of the 2004 Act. However, the Council has requested that I recommend**

Main Modifications to make the Plan sound and therefore capable of adoption. I conclude that, with the recommended Main Modifications set out in the Appendix, the NEEAAP satisfies the requirements of Section 20(5) of the 2004 Act and meets the criteria for soundness in the National Planning Policy Framework.

Matthew C J Nunn

Inspector

This report is accompanied by the Appendix containing the Main Modifications

APPENDIX – Main Modifications

The modifications are expressed in the conventional form of **underlining** for additions of text, or ~~strikethrough~~ for deletions. The page and paragraph numbers refer to the submission version of the Plan.

MM	Page	Chapter, Section, Policy, Paragraph, Diagram, Table, Figure	Main Modification
MM1	20	Chapter 2 Area Context and Opportunities – 2.3 Land Use and Character - Para 2.3.4	2.3.4 There are opportunities to improve the image and character of individual areas so that they become more distinctive. <u>There is a particular opportunity to improve areas of historic interest such as conservation areas and the setting of listed buildings, and to make sure new development relates sensitively to them in terms of height, scale and design.</u> The descriptions of
MM2	24	Chapter 2 Area Context and Opportunities – 2.3 Land Use and Character Paras 2.3.29 – 2.3.32	2.3.28 South Street ends at Ponders End Station, and only pedestrians and cyclists can cross the railway line at this point to access Wharf Road and the area known as Ponders End Waterfront. <u>2.3.29 Part of the Ponders End: South Street and the Alma Estate area falls within two important view corridors - westwards from King's Head Hill in the adjacent London Borough of Waltham Forest; and eastwards on the approach to Enfield Town from Windmill Hill. The views chosen are valued because they make a significant contribution to a person's ability to understand the borough and Enfield's position within the wider north London context.</u> <u>2.3.30 The bridge over the railway line provides important long views southwards towards the City of London and Docklands with tall buildings clearly visible and silhouetted on the horizon.</u> Para numbers to be changed to 2.3.31 – 2.3.34

MM	Page	Chapter, Section, Policy, Paragraph, Diagram, Table, Figure	Main Modification
MM3	34	Chapter 2 Area Context and Opportunities Para 2.6.13	<p>2.6.13 Potential Transport Improvement: The Council wishes to ensure that transport improvements are coordinated so that a package of projects helps to secure long-term change in the area. The Council is developing <u>through detailed technical assessment and close working with TfL, the a Northern Gateway Access Package (NGAP) that will</u> brings together a range of <u>potential</u> transport improvements <u>options that may</u> include:</p> <ul style="list-style-type: none"> • a package of restraint measures to limit general traffic growth and discourage car trips towards central London; • the West Anglia Mainline Enhancement project, along with measures to retain and improve local connectivity for pedestrians, cyclists, buses and local car journeys; • <u>Crossrail 2, transforming frequency of rail services, journey times, journey quality and connectivity benefits to the area;</u> • improved access to local railway stations; • new and/or improved bus routes; and • <u>Highway improvements to address congestion and poor air quality.</u> <p>• a new link between the A1055 and the A121 to connect to junction 26 of the M25 mitigating the impact of the scheme in Rammey Marsh as much as possible. This has the potential to significantly improve access onto the M25 and beyond from key industrial areas, and direct heavy vehicles away from residential areas.</p>
MM4	41	Chapter 2 Area Context and Opportunities Para 2.9.8	<p>Transport and movement: Key transport and movement opportunities for the AAP are to:</p> <ul style="list-style-type: none"> • encourage a shift away from the private car to more sustainable modes of transport, including buses, trains, walking and cycling through the NGAP project. To make this shift happen, the following initiatives are required: <ul style="list-style-type: none"> - increasing the frequency of trains through the West Anglia Mainline enhancement project; - <u>explore the potential impacts and benefits of Crossrail 2 supporting the delivery of Crossrail 2 and working with stakeholders to explore the impacts, benefits and opportunities it will bring;</u> - improving bus services by increasing the frequency of existing routes and, where possible, introducing new

MM	Page	Chapter, Section, Policy, Paragraph, Diagram, Table, Figure	Main Modification
			<p>routes;</p> <ul style="list-style-type: none"> - enhancing existing cycle routes and providing new ones that link key destinations such as local centres, employment areas and schools; and - improving the public realm so that the pedestrian experience is more pleasant. This is especially important for the local centres and around stations, where pedestrian activity is focused. <ul style="list-style-type: none"> • in undertaking public realm and cycle route improvements, enhance the arrival and movement experience through the area, creating distinct and memorable gateways and making journeys to and through neighbourhoods understandable; and • ensure that improvements options to transport form part of a coordinated strategy.7 bringing together restraint measures to limit general traffic growth with improvement to public transport, walking and cycling, and - where necessary - improvements to roads: such as a new a new link between the A1055 and the A121 to connect to junction 26 of the M25 (the Northern Gateway Access Route).
MM5	42	Chapter 3 Vision and Objectives 3.1	<p>Transforming transport to and within the area by:</p> <ul style="list-style-type: none"> • bringing forward a comprehensive package of projects to improve transport by all modes (the Northern Gateway Access Package, or NGAP); including a new link between Mollison Avenue and Meridian Way (the Northern Gateway Access Route, or NGAR); • as part of NGAP, significantly increasing train frequencies on the eastern rail corridor through the West Anglia Mainline Enhancement project to increase to 3-4 tracks; • explore the potential impacts and benefits of Crossrail 2 <u>supporting the delivery of Crossrail 2 and working with stakeholders to explore the impacts, benefits and opportunities it will bring;</u> • implementing a connected network of new and improved pedestrian and cycle routes that enhance east-west connections in particular; and • improving bus reliability, frequency and extending routes so that the bus becomes a genuinely attractive form of transport.

MM	Page	Chapter, Section, Policy, Paragraph, Diagram, Table, Figure	Main Modification
MM6	43	Chapter 3 Vision and Objectives Figure 3.1	Delete reference and annotation for Potential Northern Gateway Access Road (NGAR) Add reference and annotation for <u>Crossrail 2 – Potential Regional Route</u>
MM7	45	Chapter 3 Vision and Objectives Objective 5 3.2.6 – Bullet 6	<ul style="list-style-type: none"> support the provision of transport infrastructure with an emphasis on sustainable transport, which increases accessibility and navigation. Of particular emphasis will be strong support for improvements to rail infrastructure and the feasibility of the West Anglia Mainline Enhancement Project of the West Anglia mainline, <u>and explore highway improvements to address congestion and poor air quality</u> the feasibility of direct access to the M25 as part of the overall NGAP <u>potential</u> package of projects;
MM8	50	Chapter 4 Movement 4.3.2	<p>NGAP will include: <u>Through the detailed technical assessment of NGAP, an sequential incremental approach will be taken to the consideration selection of options, starting with measures to encourage a shift towards non-car modes, then local traffic management measures, and finally upgrading the additional highway network infrastructure. This will bring together a range of transport improvement options that may potentially include:</u></p> <ul style="list-style-type: none"> a package of restraint measures to limit general traffic growth and discourage car trips towards central London; the West Anglia Mainline Enhancement project, along with measures to retain and improve local connectivity for pedestrians, cyclists, buses and local car journeys; <u>Crossrail 2, transforming frequency of rail services, journey times, journey quality and connectivity benefits to the area;</u> improved access to local railway stations; new and/or improved bus routes; and <u>Highway improvements to address congestion and poor air quality.</u> a new link between the A1055 and the A121 to connect to junction 26 of the M25, mitigating the impact of the scheme in Ramney Marsh as much as possible. This has the potential to significantly improve access onto the M25 and beyond from key industrial areas, and direct heavy vehicles

MM	Page	Chapter, Section, Policy, Paragraph, Diagram, Table, Figure	Main Modification
			away from residential areas. The link is known as the Northern Gateway Access Route (NGAR) .
MM9	51	Chapter 4 Movement Figure 4.1	Title - FIGURE 4.1: POTENTIAL MAJOR INFRASTRUCTURE PROJECTS AS PART OF NGAP Delete reference and annotation for Potential Northern Gateway Access Road (NGAR) Add reference and annotation for <u>Crossrail 2 – Potential Regional Route</u>
MM10	53	Chapter 4 Movement Figure 4.2	Delete reference and annotation for Potential Northern Gateway Access Road (NGAR) Add reference and annotation for <u>Crossrail 2 – Potential Regional Route</u>
MM11	55	Chapter 4 Movement	Policy 4.5 Turkey Street – Ordnance Road – Enfield Lock- Lee Valley Park Pedestrian and Cycle Route Once the level crossings at Enfield Lock Station is closed, <u>Prior to any closure of the level crossing at Enfield Lock Station,</u> the Council will develop a scheme for improving this route for <u>vehicles,</u> pedestrians and cyclists. ..."
MM12	80	Chapter 6 – Employment and Retail Parks – Policy 6.1 – Part B	Part B: New industrial development or redevelopment will be permitted within the industrial areas identified as SIL and LSIS on Figure 6.1 of this AAP. Proposals for new industrial development or redevelopment will be required to contribute to improvements towards access and environmental quality of the estate. Where appropriate, <u>and having regard to viability and the operational requirements,</u> proposals should: <ul style="list-style-type: none"> • provide efficient car parking layouts that direct car users away from parking on the street; • ensure building frontages positively address public streets;

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	81	Chapter 6 – Employment and Retail Parks – Figure 6.2	<ul style="list-style-type: none"> • improve circulation on internal estate roads where development is of sufficient scale to enable this to happen; and • provide good quality public realm and, where appropriate, planting to support the biodiversity of the area. <p>BRIMSDOWN INDUSTRIAL ESTATE</p> <p>Comprehensive redevelopment of parts of the Brimsdown Industrial Estate has the potential to raise the quality of the area and provide modern large floorplate accommodation. Comprehensive site rationalisation will be supported subject to plans meeting other planning policies. Opportunities for new cycle routes that would collectively provide a connected network that would improve access to the Brimsdown Estate for employees will be encouraged. <u>Routes shall have regard to the operational requirements of business and the need to ensure cyclist safety.</u></p> <p>Redevelopment of existing buildings or new development adjacent to those routes identified as a gap in an existing route or an opportunity for a new cycle route shall ensure that:</p> <ul style="list-style-type: none"> • the layout of the proposed development provides for the cycle route within the public realm; and • the design of the buildings ensures that frontages positively address the public realm within which the cycle route is located. <p><i>Figure 6.2: Brimsdown Key Routes - Key to be amended as follows:</i></p> <p>Gap in Existing Route <u>(Alignment is indicative)</u> Opportunity for New Cycle Route <u>(Alignment is indicative)</u></p>
MM13	88	Chapter 8 Green Network and Food Growing – 8.1	<p>North East Enfield has some excellent open spaces, not least the Lee Valley Regional Park <u>and Waterways.</u> But it also has some shortfalls. This section sets out policies to improve green spaces in the area, provide new elements to connect the green network together</p>

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	90	Chapter 8 – Green Network and Food Growing - Policy 8.3	<p>and support local food growing.</p> <p>8.1 Introduction</p> <p>8.1.1 The overall policy approach is to ensure that there is a network of well-connected open spaces within North East Enfield, providing a mix of different spaces and facilities for all age groups. The Lee Valley Regional Park <u>and Waterways, an important natural asset to the area</u> will serve local and regional needs. Smaller local and pocket parks and children's play areas, integrated into residential areas and neighbourhood centres, will serve local needs. This will be achieved by:</p> <ul style="list-style-type: none"> • improving existing open spaces; • requiring new open space within new developments; • joining green spaces together to create a connected green network; • creating better links to the Lee Valley Regional Park <u>in accordance with Core Strategy Policy 35 - Lee Valley Regional Park and Waterways and the Lee Valley Regional Park Development Framework – Area 5 Proposals</u>; and • re-introducing market gardening to the area. <p><i>Policy 8.3 to be amended as follows:</i></p>
	93	Chapter 8 - Green Network and Food Growing – Figure 8.2	<p>The Council will develop a strategy to create a series of east-west strategic green corridors connecting existing spaces <u>and the River Lee Navigation</u> together as set out in Figure 8.2. These corridors will be designed to reflect the character of the neighbourhoods through which they pass and will therefore change character along their length. Schemes should include new native planting and, where appropriate, water features, ecological habitats, <u>softening hard edges</u> and so on. Where new development forms part of or is immediately adjacent to a strategic green corridor, the Council will require the development to incorporate appropriate landscape elements to support the overall corridor.</p> <p>Strategic Green Corridors annotation to reflect improvements to the River Lee Navigation Tow</p>

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			Path
MM14	128	Chapter 12 – Ponders End Waterfront – Policy 12.1	<p>This is a major opportunity for employment-led mixed-use development that connects the waterfront back to the wider NEE area, creating a distinctive place and a valuable leisure resource for local people. Key principles include:</p> <ul style="list-style-type: none"> • redevelop the area for an employment-led mix of uses in high quality new buildings that collectively create a <u>that respond to the historic character of the area and waterfront setting to enhance this</u> distinctive quarter within the NEE area; • <u>seek opportunities to enhance the Ponders End Flour Mills Conservation Area and the setting of listed buildings;</u> • ensure that active building frontages overlook the waterways and streets and spaces within the development; • provide a pedestrian / cycle route along the waterways; • create views through the development to the water and to the reservoir embankments beyond;
MM15	128	Chapter 12 – Ponders End Waterfront – Policy 12.1	<p>This is a major opportunity for employment-led mixed-use development that connects the waterfront back to the wider NEE area, creating a distinctive place and a valuable leisure resource for local people. Key principles include:</p> <ul style="list-style-type: none"> • redevelop the area for an employment-led mix of uses in high quality new buildings collectively create a that respond to the historic character of the area and waterfront setting to enhance this distinctive quarter within the NEE area; • seek opportunities to enhance the Ponders End Flour Mills Conservation Area and the setting of listed buildings; • ensure that, <u>where possible, having regard to viability and operational requirements,</u> active building frontages overlook the waterways and streets and spaces within the development;

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			<ul style="list-style-type: none"> • provide a pedestrian / cycle route along the waterways; • create views through the development to the water and to the reservoir embankments beyond;
MM16	128	Chapter 12 – Ponders End Waterfront – Figure 12.2/Key	<p><u>Illustrative</u> Active Building Frontages</p> <p>Key <u>Illustrative</u> Views Protected and Enhanced</p> <p>New extension to existing key route (<u>Alignment is illustrative</u>)</p>
MM17	136	Chapter 14 - Enfield Wash Local Centre Policy 14.2	<p>Policy 14.2: Redevelopment of Co-operative Site</p> <p>The redevelopment of the Co-operative store and - if possible - adjoining land for mixed-use, retail-led development will be supported. Any redevelopment should:</p> <ul style="list-style-type: none"> • create a strong, positive <u>A1</u> retail frontage to Hertford Road; • <u>incorporate a range of other uses, which may include residential, offices and community uses;</u> • design the corner at Unity Road / Hertford Road to act as a distinctive gateway feature to Enfield Wash from the north; • relate the new development sensitively to existing residential dwellings on Unity Road and on the recently developed Dairy Close site to the west; and • incorporate shoppers' car parking.
MM18	149	Chapter 18 - Enfield Lock Conservation Area Para 18.1.3	<p>18.1.3 Figure 18.1 overleaf sets out the key issues affecting the Conservation Area and these include:</p> <ul style="list-style-type: none"> • the strong linear form of the Lee Navigation and the listed terrace known as Government Row form one of the most memorable parts of the Conservation Area; • the lock itself forms the heart of the area. However, the derelict Rifles public house nearby detracts from the area. The site has planning permission for redevelopment as residential; • <u>the area is subject to the risk of flooding.</u>

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			<p><u>Any future development will need to address the flood risk in line with higher level policy requirements;</u></p> <ul style="list-style-type: none"> • the pedestrian / cycle route
MM19	150	<p>Chapter 18 - Enfield Lock Conservation Area</p> <p>Fig 18.1</p>	<p><u>Add flood risk area to plan and add to key.</u></p>
MM20	153	<p>Chapter 19 - Brimsdown Station Area</p> <p>Section 19.1</p>	<p>19.1.4 Buildings to the east of the railway line are principally large industrial buildings that do not relate well to the street, being setback at odd angles and having blank frontages. The junction to Mollison Avenue is particularly weak, with low quality buildings set well back.</p> <p><u>19.1.5 Land to the east of the railway line is at risk of flooding. Any future development will need to address the flood risk in line with higher level policy requirements.</u></p> <p>19.1.6 If the proposed West Anglia Mainline Enhancements</p> <p>19.1.7 The policies in this chapter</p>
MM21	154	<p>Chapter 19 - Brimsdown Station Area</p> <p>Figure 19.1</p>	<p><u>Add flood risk area to plan and add to key.</u></p>
MM22	185	<p>Glossary – NGAP/NGAR</p>	<p>NGAP - Northern Gateway Access Package</p> <p><u>NGAP will coordinate transport improvements across North East Enfield as a whole with the aims of:</u></p> <ul style="list-style-type: none"> • <u>improving connectivity by all modes for existing businesses and residents;</u> • <u>enhancing Brimsdown and other parts of North East Enfield as a place to do business;</u> • <u>addressing existing transport impacts, including severance, congestion and poor air quality; and</u>

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			<p><u>• ensuring that the necessary transport infrastructure is in place (including pedestrian and cycle infrastructure) to support planned population and employment growth in North East Enfield and the wider Upper Lee Valley.</u></p> <p>NGAP is a multi-modal access package of options that is planned to incorporate a variety of potential improvement to transport, including: enhancements to the West Anglia Mainline; exploring the potential impacts and benefits of Crossrail 2, transforming frequency of rail services to the area; improved access to local Railway Stations; new or improved bus routes; a package of restraint measures to limit general traffic growth; and improved highway connections between A1055 Mollison Avenue and the M25. a new link between the A1055 and the A121 to connect to junction 26 of the M25 new vehicle link (NGAR) proposed between the M25 and Mollison Avenue.</p> <p>NGAR Northern Gateway Access Road</p> <p>NGAR is part of NGAP, and is planned to provide a new road linkage between Bullsmoor Lane/Mollison Avenue (A1055) connecting to Junction 25 of the M25.</p>