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1 Introduction

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1.1 Introduction

1.1.1 The London Borough of Enfield is preparing an Area Area Action Plan (AAP) which will provide a comprehensive planning policy framework to guide future development and investment in North East Enfield (NEE). The AAP has been produced over a period of several years, and there is a large amount of background information. The following documents are especially important:

- the North East Enfield Area Action Plan Baseline Report (June 2007);
- the North East Enfield Area Action Plan Issues and Options Report (February 2008);
- the North East Enfield Area Action Plan Preferred Options Report (February 2009); and

1.1.2 There has been significant change and progress made since 2009. The Council adopted its Core Strategy for the borough in November 2010 which provides the strategic direction for NEE area. The Ponders End Framework for Change was published in August 2009 and the Ponders End Central Planning Brief was adopted by the Council, May 2011. At the regional level, the Mayor of London published his new London Plan in 2011 and the Opportunity Area Planning Framework (OAPF) for the Upper Lee Valley was adopted in July 2013.

1.1.3 The key messages from these publications and earlier stages of consultation have shown that a comprehensive approach to planning the future of NEE is needed. As a result, the Council moved forward with the AAP with the publication of an Interim Direction Document in August 2012. This was consulted on during 2012.

1.1.4 This report provides an update of baseline information, so providing a context for the AAP document. It builds on the information contained in the three key documents above, drawing together issues from a range of other documents (which are listed in Appendix 1) and provides new information. It has been produced by a consultant team led by Tibbalds Planning and Urban Design, and including Peter Brett Associates and Aspinall Verdi.

1.2 Purpose of the AAP

1.2.1 The area covered by this document is shown in Figure 1.1 opposite. At first glance the area has much to offer: its diverse neighbourhoods of Ponders End, Enfield Highway, Enfield Wash and Enfield Lock, thriving industrial areas of Brimsdown and Innova Park and an area of natural recreation in the Lee Valley Regional Park and Waterways. This area is home to a diverse community of around 77,000 people and approximately 1000+ businesses, and many people travel to and through the area to work.

1.2.2 However, it is home to some of London’s poorest communities suffering from high unemployment, low skill base, low educational attainment and a higher than average level of benefit claimants and income deprivation which has a disproportionate effect on children and older people.

1.2.3 The AAP will set a vision for the future of the area, and a series of specific policies and actions to secure change. The AAP will be used by the Council to support and guide its own projects and initiatives, as well as those involving its partners. The AAP will also be used to assess planning applications within the NEE area.
1.3 Area Location and Context

1.3.1 The North East Enfield AAP area is defined by four key north-south transport routes:
- the Great Cambridge Road (A10) forms the western boundary to the AAP. It is a very busy road that is difficult for pedestrians and cyclists to cross, and so forms a strong ‘edge’ to the area;
- the western rail corridor, serving Southbury and Turkey Street Stations;
- Hertford Road (A1010) is the main community spine in the area, where local centres and concentrations of activity are located surrounded by built up neighbourhoods. There are conflicts along this corridor between the quality of the centres and the volumes of traffic along it; and
- the eastern rail corridor, serving Ponders End, Brimsdown and Enfield Lock Stations. This forms a major barrier to movement due to the restricted crossings along its length.

1.3.2 The M25 motorway forms the northern boundary to the area, and the A10 connects with it at Junction 25. The A110 runs east-west within the southern part of the area, changing its name from Lea Valley Road to Nags Head Road to Southbury Road as it moves westwards. This road forms an important gateway into the NEE area.

1.3.3 Part of the eastern side of the AAP area lies within the Lee Valley Regional Park, an important natural asset not only for local people but also for the wider area. However, the open spaces and waterways are largely hidden from view, inaccessible and thus under utilised.

1.3.4 The central part of the study area is predominantly residential outside of the Hertford Road corridor, and includes a range of social and community uses such as schools, GP surgeries, open space and small parades of shops. The eastern side of the study area is dominated by the very large Brimsdown Industrial Estate. The area adjacent to the A10 includes some large retail parks as well as residential areas. The land use and character of the area is described in more detail overleaf.

**FIGURE 1.2 KEY***

- AAP Study Area boundary
- Motorway
- Railway line
- Major ‘A’ roads
- ‘B’ roads
- Waterways
- Enfield Borough boundary
- Ponders End High Street
- Ponders End South Street / Alma Housing Estate
- Ponders End Waterfront
- Brimstown Industrial Estate
- River Lee and Lee Valley Regional Park
- Enfield Highway Local Centre
- Enfield Wash Local Centre
- Enfield Island Village
- Alma Industrial Estate
- Innova Park
- Freezywater
- Redburn Trading Estate
- Meridian Business Park
- Queensway Industrial Estate
- Great Cambridge Road and Martinbridge Trading Estate
# Planning Policy Context

## 2 Policy Context

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<td>2.12 Land for Food</td>
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2.1 Introduction

2.1.1 The North East Enfield [NEE] area occupies a key position in a wider growth area. It sits within the London-Stansted-Cambridge growth corridor and the Upper Lee Valley. Figure 2.1 shows the area within this its wider context. The planning policy context for the North East Enfield Area Action Plan is set by:

- the National Planning Policy Framework (NPPF);
- regional policy in the form of the London Plan (July 2011) and the Upper Lee Valley Opportunity Area Planning Framework (July 2013); and
- local policy, in particular the adopted Core Strategy, the Enfield Plan (November 2010).

2.1.2 The NPPF: The National Planning Policy Framework sets out the Government’s planning policies for England and how these are expected to be applied. It is intended to provide a framework within which local councils can produce their own distinctive local plans, which reflect the needs and priorities of their communities. Regional and local policy is expected to accord with policy set out in the NPPF. The current version of the NPPF was published in March 2012, after the adoption of the Enfield Plan and the London Plan, and prior to the adoption of the Upper Lee Valley Opportunity Area Planning Framework. Nevertheless, planning policies in both the London Plan and the Enfield Plan broadly accord with the NPPF, particularly in their promotion of and support for sustainable development.

2.1.3 Whilst they set important principles, NPPF policies cannot be specific to local areas. In order to focus on the policies most relevant to the North East Enfield AAP, this chapter of the Baseline Update concentrates on regional and local planning policy.

2.1.4 Regional Policy - London Plan: Strategic planning in London is the shared responsibility of the Mayor of London, 32 London boroughs and the Corporation of the City of London. Under the legislation establishing the Greater London Authority (GLA), the Mayor must produce a spatial development strategy (SDS) – which has become known as 'the London Plan' – and to keep it under review. Boroughs' local development documents must be 'in general conformity' with the London Plan, which is also legally part of the development plan that has to be taken into account when planning decisions are taken in any part of London unless there are planning reasons why it should not.

2.1.5 The London Plan only deals with issues of strategic importance to Greater London. Individual boroughs address specific local issues in their own local development documents.
FIGURE 2.1: LONDON AND THE WIDER STANSTED CORRIDOR

FIGURE 2.1 KEY

- Growth corridors
- London Borough of Enfield
- North East Enfield Area Action Plan
- Upper Lee Valley Opportunity Area boundary
- Motorway
- A406
- River Thames
2.1.6  **Regional Policy - Upper Lee Valley Opportunity Framework:** In addition to the London Plan, the Mayor of London is able to produce area specific planning frameworks that provide coordinated strategies across boroughs. The Upper Lee Valley Opportunity Area Planning Framework (OAPF) sets out an overarching framework for an area of 3,884 hectares shared between the London Boroughs of Enfield, Haringey, Waltham Forest and Hackney. The North East Enfield AAP area lies wholly within the OAPF area.

2.1.7  The OAPF was produced by the GLA working with the four boroughs together with wider stakeholders including Transport for London, the Lee Valley Regional Park Authority and the North London Strategic Alliance. The OAPF was adopted in July 2013. In addition to objectives to secure new jobs and homes across the OAPF area as a whole, objectives relating to the NEE area are:

- growth at Ponders end;
- optimised development and redevelopment opportunities along the A10/A1010 corridor;
- Lee Valley Heat Network;
- significant investment and improvements to transport infrastructure, including four trains per hour on the West Anglia Main Line and improvements to help people walk and cycle more easily through the area;
- a fully accessible network of green and blue spaces which open up the Lee Valley Regional Park; and
- relieving congestion on the A10 and Bullsmoor Lane.

2.1.8  **Local Policy - The Enfield Plan Core Strategy 2010-2025:** The Core Strategy forms part of Enfield’s Local Development Framework (LDF). The Core Strategy is the most important of the suite of documents that make up Enfield’s LDF, setting out the Council’s strategy for planning in Enfield and providing context for more detailed LDF documents:

- Proposals Map;
- Sites Schedule;
- Enfield Design Guide;
- Development Management Document;
- Enfield Town Area Action Plan and Masterplan for the area around Enfield Town station;
- North East Enfield Area Action Plan, Ponders End Framework for Change and three Planning Briefs for the key sites in Ponders End;
- Central Leeside Area Action Plan and Masterplan for Meridian Water;
- North Circular Area Action Plan and Masterplan for New Southgate; and
- North London Joint Waste Plan.

2.1.9  The Core Strategy sets out a spatial planning framework for the long term development of the Borough for the next 15 to 20 years. It is a strategic document providing the broad strategy for the scale and distribution of development and the provision of supporting infrastructure, ensuring that investment decisions are not made in isolation but are properly coordinated to ensure development is sustainable. It contains core policies for delivering the spatial vision, guiding patterns of development and is supported by other development plan documents.

2.1.10  **Local Policy - Enfield’s Development Management Document (DMD).** The DMD provides detailed criteria and standard based policies for assessing planning applications. It is a borough wide document and will apply to all planning applications from home extensions to large scale applications for residential, commercial and mixed use development. The final version of the DMD was agreed by the Council for submission to the Government for examination in March 2013 and following examination, adopted in November 2014.

2.1.11  This planning policy context chapter sets out planning policies relevant to the North East Enfield AAP, and groups these under the following headings:

- outer London;
- Opportunity Areas and areas for regeneration;
- employment;
- green infrastructure;
- housing;
- social infrastructure;
- retail;
- transport;
- design and character;
- sustainable energy; and
- land for food.
FIGURE 2.2: NEE WITHIN THE UPPER LEE VALLEY CONTEXT AND NEE WITHIN ITS IMMEDIATE CONTEXT

FIGURE 2.2 KEY
- North East Enfield Area Action Plan boundary
- Upper Lee Valley Opportunity Area boundary
- Central Leeside Area Action Plan
- Edmonton Green Masterplan boundary
- Borough boundaries
- Waterways
2.2 Outer London

2.2.1 The London Borough of Enfield is an outer London borough. The London Plan identifies particular challenges for outer London boroughs, and seeks to encourage planning policies that relate to local circumstances, avoiding a ‘one size fits all’ approach to the outer boroughs.

2.2.2 London Plan Policy 2.6 Outer London: Vision and Strategy identifies that a joined up approach to ‘place shaping’ is essential, bringing together economic development, transport and quality of life considerations. The Plan notes that outer London has an important strategic function as a place to live, and that it will be important to ensure the area continues to provide a range of homes in sufficient numbers to support economic success.

2.2.3 Generally, outer London boroughs have seen lower economic growth than inner London. London Plan Policy 2.7 Outer London: Economy seeks to encourage growth and sets out 16 ways in which growth can be supported. Of particular relevance to NEE are:

- enabling existing sources of growth to perform more effectively, and increasing the competitive attractiveness of outer London for new sectors or those with the potential for step changes in output;
- improving accessibility to competitive business locations (especially town centres and strategic industrial locations) through: making the most effective use of existing and new infrastructure investment; encouraging walking, cycling and public transport use;
- providing strategic and local coordination within development corridors, including across the London boundary, to enhance competitive advantage and synergies for clusters of related activities and business locations, drawing on strategic support through opportunity area planning frameworks;
- prioritising improvements to the business environment, including safety and security measures; partnership-based approaches like business improvement districts; enhancing the vibrancy of town centres through higher density, retail, commercial and mixed use development including housing; providing infrastructure for homeworking; improving access to industrial locations; developing opportunities for decentralised energy networks and ensuring high quality design contributes to a distinctive business offer;
- managing and improving the stock of industrial capacity to meet both strategic and local needs, including those of small and medium sized enterprises (SMEs), start-ups and businesses requiring more affordable workspace; and
- identifying and addressing local pockets of deprivation, and especially the strategic priorities identified in this Plan as regeneration areas.

2.2.4 The London Plan states that ensuring adequate transport capacity and infrastructure will be particularly important in planning effectively and sustainably for growth in outer London. Policy 2.8 Outer London: Transport sets out nine principles for improving transport, including the following of specific relevance to North East Enfield’s transport issues:

- enhancing accessibility by improving links to and between town centres and other key locations by different modes and promoting and realising the improvements to the rail network;
- working to improve public transport access to job opportunities in the Outer Metropolitan Area, supporting reverse commuting, and enhancing the key role played by efficient bus services in outer London; and
- encouraging greater use of cycling and walking as modes of choice in outer London.

FIGURE 2.3 KEY

- AAP Study Area boundary
- Motorway
- Railway line
- Railway station
- Major ‘A’ roads
- Site of Special Scientific Interest
- Green Space protected by Planning Policy designations
- Strategic Industrial location
- Locally significant industrial site
- Regeneration Priority area
- Retail park
- Key Local Centre
- Conservation Area
- Archaeological Priority Areas
2.3 Opportunity Areas and Areas for Regeneration

2.3.1 The London Plan targets specific areas for intervention and action. The North East Enfield area is identified in two policies:

- London Plan Policy 2.13 Opportunity Areas This policy identifies opportunity and intensification areas, of which the Upper Lee Valley is one. The North East Enfield AAP area lies wholly within this opportunity area. The policy provides the basis for producing area planning frameworks – the Lee Valley Opportunity Area Planning Framework was adopted in July 2013, and a summary of key issues in the OAPF is set out below.

- London Plan Policy 2.14 Areas for Regeneration The Ponders Ends area of North East Enfield is identified as being an area for regeneration. The policy commits the Mayor to working with strategic and local partners to co-ordinate the sustained renewal of these areas by prioritizing them for neighbourhood-based action and investment. In addition, the policies require boroughs to identify areas for regeneration in their Local Development Framework. Ponders End is identified in LBE’s Core Strategy as a Place Shaping Priority Area and this is discussed below under local policy.

2.3.2 Core Strategy Policy 1 supports these London Plan policies by identifying four strategic growth areas where the Council will plan to focus future growth and development. North East Enfield is one of the four, and the policy goes on to state that area action plans will be prepared for each of the areas to provide a framework for development and the context for more detailed masterplans for place shaping priority areas within them.

2.3.3 Core Policy 40 sets out a vision for North East Enfield and identifies specific policies. Map 9.4 identifies the area to be covered by the North East Enfield AAP. It should be noted that the western boundary has changed as a result of ongoing work and consultation on the AAP, and now follows the eastern edge of the A10 for its entirety. Key principles within the policy include:

- North East Enfield’s reputation as a thriving and competitive industrial business location will be enhanced, with the Strategic Industrial Locations of Brimsdown, Redburn Trading Estate and Meridian Business Park and Freezywater retained, with the latter expanded to include Innova Park;

- 1,000 new homes will be developed. The focus for change and development, and hence the majority of these new homes, will be in Ponders End:

- in the west, in the heart of Ponders End local centre, there is a cluster of sites including the former Middlesex University campus, adjacent Queensway employment area, land around Tesco and sites along Hertford Road, referred to as “Ponders End Central”;

- in the middle, along South Street, there are opportunities at the gasholder site on South Street, around Ponders End railway station, and at Alma Estate. This collection of sites is referred to as “Ponders End South Street Campus”; and

- in the east, near the Lee Valley Regional Park, development opportunities exist at Columbia Wharf and at the southern part of Brimsdown, collectively referred to as “Ponders End Waterfront”.

- social and community infrastructure to support an expanding population will be accommodated;

- the Council will promote improvements to public transport and access to the area by car, bicycle and on foot and in particular:

  - improvements to the busy Hertford Road corridor to improve the environment for pedestrians and road users alike;

  - more attractive and green links to maximise access east-west to the Lee Valley Park and to the existing communities and employment areas; and

  - improvements to north-south pedestrian and cycle routes within the Lee Valley Park.

- work with its partners to ensure that negative impacts of the proposed new investment in the Lee Valley rail line are mitigated, for example by replacing the level crossings at Brimsdown and Enfield Lock stations with new bridges and/or underpasses; and

- continue work on the benefits of a Northern Gateway Access Package to improve accessibility to and from North East Enfield, with a particular focus on supporting business growth.

2.3.4 Ponders End is an area with considerable potential given its location so close to the Lea Valley Regional Park, strong transport routes including Southbury and Ponders End railway stations and Picketts Lock to the South. Ponders End is the third most deprived ward in the Borough and falls within the worst 25% of all wards in England. Considerable investment and improvement is therefore needed to ensure that Ponders End fulfils its potential as a desirable and settled community. Ponders End contains significant and viable sites for change and redevelopment, many of which have already attracted significant developer interest for mixed use redevelopment. Ponders End is defined as a Place Shaping Priority Area, and Core Strategy Policy 41 sets out the objectives for new development which are to create:
Fig. 1.3 The Upper Lee Valley Objectives

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Source: Upper Lee Valley Opportunity Area Framework
• up to 1,000 new homes up to 2026, with a range of sizes and tenures, including affordable homes. Sites that could accommodate housing as part of mixed use developments include the former Middlesex University campus at Ponders End Central, and Columbia Wharf and southern part of Brimsdown at Ponders End Waterfront;
• an attractive public realm, designed to promote community safety, and promoting a better street environment along Hertford Road and South Street, and good links to public transport and leisure facilities such as Ponders End Recreation Ground and the Lee Valley Regional Park;
• high quality new development that complements the heritage assets and historic environment of Ponders End, such as the listed Middlesex University building in Ponders End Central and Ponders End Flour Mill at Ponders End Waterfront;
• improve the quality of and access to Ponders End Recreation Ground;
• a holistic development at Ponders End Central incorporating the former Middlesex University campus, Queensway employment area, better use of land around the Tesco store and a vibrant, good quality local shopping centre and community hub, with vacant sites along Ponders End High Street redeveloped to complement the local offer;
• explore options to improve the provision of community service, currently located at Swan Annex;
• a pedestrian-oriented community hub at Ponders End South Street Campus, with a new Academy at its heart, an improved relationship between the Alma towers and surrounding community, a proper street network with uses fronting the street and improved access to Ponders End station and between the station and the Lee Valley Regional Park;
• a new mixed use, employment, leisure and residential community at Ponders End Waterfront of exceptional quality, including sites at the southern part of Brimsdown and Columbia Wharf, helping to reconnect the Ponders End community with its waterfront and contributing to the chain of attractions along the Lee Valley Regional Park. A reduction in flood risk through the appropriate location, layout and design of new development and mix of land uses will be sought; and
• a co-ordinated strategy to managing flood risk.

2.3.5 The OAPF includes a chapter on Ponders End which largely reflects the objects in Core Strategy Policy 41. It identifies the following recent and future development opportunities:
• The former gas holders site on South Street has been redeveloped to provide a new academy which became operational in January 2013. Improvements have also been delivered in Ponders End Park on the High Street.
• In July 2012 Enfield Council’s Cabinet approved demolition and redevelopment of the entire Alma Housing Estate on South Street to replace the existing 717 residential properties with new homes. The existing commercial parade is to be potentially moved towards Ponders End Station. Access to Ponders End station and the Lee Valley Regional Park will also be improved.
• The former Middlesex University site, now referred to as the Electric Quarter will be a mixed-use redevelopment with up to 408 new homes, employment spaces, modern high quality retail space and the relocated Ponders End Library to become the heart of the local centre to create a continuous and vibrant High Street.
• The land adjacent to the Lee Valley Regional Park waterside (referred to as Duck Lees Lane in the OAPF’s indicative masterplan) will be redeveloped into a new mixed-use employment community to reconnect the Ponders End community with its waterfront and to improve access to and through the regional park for the Lee Valley as a whole.

2.3.6 Since the adoption of the Core Strategy and the OAPF, circumstances have changed on the Electric Quarter and Duck Lees Lane. The former Middlesex University site is coming forward as a free school, leaving approximately one third of the site onto Ponders End High Street available for mixed-use development. The area identified as Duck Lees Lane in the OAPF forms part of the wider area know as Southern Brimsdown in the NEE AAP. The owners of this land have indicated that employment-led development without mixed-use is their preferred approach. Despite these changes, the principles embodied within the OAPF for the Ponders End area continue to be relevant. There are two sets of principles: those relating to opening up the Lee Valley Regional Park; and those relating to an indicative masterplan.

2.3.7 Opening up the Lee Valley Regional Park: The key principles relevant to the NEE area are:
• improve signage and sense of arrival of existing routes through Brimsdown Industrial Estate to Lee Valley Regional Park;
• aspirations for a new crossing over railway to improve access from Alma Road Open Space to Brimsdown Industrial Estate and the Lee Valley Regional Park;
• explore possibility of a (vehicular) connection through Tesco car park to relieve the Nags Head junction;
• access to Southbury station via Emilia Close;
• route from the Electric Quarter development to Ponders End Park, one of the Mayor of London’s Great Spaces (note: the security requirements of the proposed Free School make this difficult to achieve);
• clear and direct routes from Academy Street development (referred to in the AAP as the South Street area) to Ponders End Park and Ponders End Waterfront. The redevelopment of the Alma Estate will reinstate the historic street pattern;
• Ponders End Waterfront development as an educational natural refuge with improved access to Park, Lee Valley Road and South Street;
• improve and enhance access to the Lee Valley Regional Park, River Lee and King George's Reservoir - partially open to public;
• enhance footpath by the drainage ditch along the allotments and create new link on the eastern edge to South Street;
• moorings for houseboats as promoted by the Rivers and Canals Trust (formerly British Waterways) and the Lee Valley Regional Park Authority; and
• North-south connection along the western side of the River Lee (already part implemented).

2.3.8 Indicative masterplan: The principles are:
• Nags Head Road and High Street Retail, community. Improve junction and revitalise High Street;
• Electric Quarter Residential, employment, retail, community. Redevelop the former Middlesex University Queensway campus into a new vibrant mixed-use local centre. It will be a key industrial strip with creative industries, community focussed buildings, retail/cafés on the ground floor and residential above. There will be further homes with communal courts and integrated on-street car parking;
• Ponders End Park Recreational / one of the Mayor's Great Spaces. Opportunity to transform into a playful and productive space with improved access and routes, upgrade of existing bandstand and tennis court, new gym area and community orchard;
• South Street Educational, community, residential. The regeneration of the Alma Estate and the delivery of the Oasis Hadley Academy (opened January 2013) on former gas holder site;
• Ponders End Station. Transport. Refurbish/replace footbridge over railway station and tracks;
• Ponders End Waterfront Leisure, educational, community growing. Improve access to regional park using the listed Wights Flour Mill as a heritage trail. Utilise water meadow for flood water storage, enhance biodiversity and separate from industrial land. Opportunity to use vacant building as an indoor workspace for visiting schools;
• Duck Lees Lane. Residential, employment, recreational, access. New employment-led mixed use scheme with north-south orientation to maximise solar access. Taller buildings have views across to the Lee Valley. Existing building to be refurbished into small workshop studio; and
• Southern Brimsdown. Employment, mixed use. Refurbish into new employment-led mixed use development orientated to mitigate against flood risk and allow slivers of ecology into the site as well as pedestrian/cycle links into the Waterfront.
2.4 Employment

2.4.1 One of the major assets of North East Enfield is its significant amount of industrial employment land, with Brimsdown being the second largest industrial area in London after Park Royal. This is a major focus for the AAO.

2.4.2 London Plan Policy 2.17 Strategic Industrial Locations seeks the promotion, management and protection of strategic industrial locations (SILS). It is clear that development proposals in SILs should be refused unless:

- they fall within the broad industrial type activities outlined in the supporting text; or
- they are part of a strategically co-ordinated process of SIL consolidation through an opportunity area planning framework or borough development plan document; or
- the proposal is for employment workspace to meet identified needs for small and medium sized enterprises (SMEs) or new emerging industrial sectors; or
- the proposal is for small scale ‘walk to’ services for industrial occupiers such as workplace crèches or cafés.

2.4.3 SILs are given strategic protection because their scale and relatively homogenous character means they can accommodate activities which elsewhere might raise tensions with other land uses.

2.4.4 The North East Enfield area has a considerable amount of land designated as SIL. The London Plan distinguishes between two types of SIL:

- Preferred Industrial Locations (PIL) which are particularly suitable for general industrial, light industrial, storage and distribution, waste management, recycling, utilities and other industrial related activities; and
- Industrial Business Parks (IBP) which are particularly suitable for activities that need better quality surroundings, including research and development, light industrial.

2.4.5 Annex 3 to the London Plan identifies the following SIL areas within North East Enfield.

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<th>Location</th>
<th>SIL Type</th>
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<tr>
<td>Brimsdown</td>
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<tr>
<td>Freezywater / Innova Park</td>
<td>PIL</td>
</tr>
<tr>
<td>Great Cambridge Road (part)</td>
<td>IBP</td>
</tr>
</tbody>
</table>

Table 2.1: Employment Land Designations

2.4.6 The Martinbridge Trading Estate (IBP), Redburn Trading Estate (PIL) and Meridian Business Park (PIL) SILs are not identified in the Annex. They are designated in the Core Strategy under Core Policy 14 which safeguards the sites. Core Policy 15 identifies Locally Significant Industrial Sites, of which there are two within the NEE area: the Alma Industrial Estate and the Queensway area. Where sites are designated as LSISs and are no longer suitable for industrial uses or have been identified through the Council’s place shaping programme as opportunities to contribute to wider regeneration benefits, a progressive release of land will be achieved through the development of comprehensive masterplans, in order to facilitate urban regeneration.

2.4.7 The Council is currently developing an Industrial Estates Strategy, which will lead to a review of Core Policy 15.

2.4.8 London Plan Policy 4.4: Managing Industrial Land and Premises, seeks to ensure a sufficient stock of industrial land and premises to meet the future needs of different types of industrial and related uses, including for good quality and affordable space. Where there is surplus land, the policy seeks to plan, monitor and manage the release of that land so that it can contribute to both strategic and local planning objectives.

2.4.9 The policy requires boroughs to demonstrate in their Local Plan how the borough’s stock of industrial land and premises in strategic industrial locations, locally significant industrial sites and other industrial sites will be planned and managed in local circumstances.

2.4.10 Core Strategy Policy 13 seeks to protect and improve Enfield’s employment offer by helping to facilitate the creation of a minimum of 6,000 new jobs from 2010-2026, focusing new growth in the Upper Lee Valley and Enfield’s town centres. The policy highlights the importance of building on Enfield’s success and diversifying the employment base. In building on success, the policy suggests that actions could include developing more proactive liaison with local companies, establishing more formalised management structures such as Business Improvement Districts (if and where there is support from businesses) and providing more coordinated public realm and infrastructure improvements in business locations.
FIGURE 2.5: LOCATION OF EMPLOYMENT AREAS
2.4.11 Examples include the logistics and distribution, advanced manufacturing, transport and communications and wholesale, construction, and repair sectors in North East Enfield and retail in Enfield Town.

2.4.12 In diversifying the employment base, the policy notes that – in North East Enfield - there is scope to develop low carbon industries in Brimsdown which include renewable energy production, low carbon technology and manufacturing and recycling. In the longer-term, there could also be an opportunity to reposition North East Enfield as a location for internationally oriented businesses, taking advantage of its location in relative proximity to Stansted Airport and the economic growth predicted in the London-Stansted-Cambridge-Peterborough growth corridor. There are also opportunities to generate employment in sport, leisure and recreation, with a new water-based leisure facility at Columbia Wharf and an extended sports and leisure offer at Pickett's Lock.

2.4.13 DMD Policy 19 reflects higher level policy by protecting Preferred Industrial Locations. The policy expands on higher level policy in relation to the Great Cambridge Road Industrial Business Park (IBP):

- Proposals for industrial activities that require a better quality surrounding, including research and development, light industrial and small scale distribution, will be permitted within the Great Cambridge Road Industrial Business Park (IBP).

- A change of use from industrial uses in the Great Cambridge Road Industrial Business Park will be refused, unless all of the following criteria are met:
  - the proposed use would not compromise the function and operation of the industrial area as a whole, the operating conditions of the other remaining industrial uses, or the potential future use of neighbouring sites for appropriate industrial uses;
  - the proposed use does not have a significant adverse impact on surrounding residents in terms of pollution, noise and traffic;
  - there is no significant net loss of industrial capacity;
  - the proposed use generates significant additional employment; and
  - the proposed development makes a significant contribution to the public realm.

- Other employment generating uses such as car show rooms, hotel and conferencing facilities may be permitted on the main road frontages and gateways of the Great Cambridge Road IBP, provided that there is no adverse impact to highway safety and the proposed use does not prejudice the efficient and effective operation of the industrial area. Car showrooms will only be permitted provided there is an associated vehicle servicing/repair activity in conjunction with the showroom.

2.4.14 DMD Policy 20 expands on Core Strategy Policy in relation to Locally Significant Industrial Sites, allowing a change of use involving a loss of industrial uses subject to three criteria being met:

- the proposed use would not compromise the primary function of the LSIS, the operating conditions of other remaining industrial uses or the potential future use of neighbouring sites for industrial uses;
- the development provides for a mix of uses including a significant element of business/industrial uses or other employment generating uses; and
- the proposed use is well designed and compatible to its surroundings.

2.4.15 The policy goes on to state that, in exceptional circumstances, where a significant element of business/industrial uses or other employment generating uses cannot be provided within the development, applications for the loss of industrial land will be acceptable, provided there is appropriate mitigation in accordance with the Council’s S106 Supplementary Planning Document.

2.4.16 Where redevelopment of industrial land or premises is accepted, particular consideration will be given towards ensuring the future viability of individual businesses that might be displaced. The onus is on the developer to find alternative accommodation for any displaced businesses.

2.4.17 DMD Policy 21 supports and expands on Core Strategy Policy in relation to complementary and supporting uses within SIL and LSIS. In relation to direct sales or trade counters, the policy states that proposals involving an element of direct sales will generally be accepted, provided that all of the following criteria are met:

- the retail element does not become the dominant use and is no more than 10% of the overall floorspace of the unit; and
- the retail element is on the ground floor.

2.5 Green Infrastructure

2.5.1 A key defining feature of the North East Enfield area is the Lee Valley Regional Park, part of which falls within the area’s eastern boundary and is designated as Green Belt. In addition to this, the area has a number of large parks and other areas which are subject to planning policy protection as metropolitan open land and local open space. Policies relating to green infrastructure in the NEE area fall into two broad categories:

- those that protect open space; and
- those that seek to improve connections to and use of the Lee Valley Regional Park.

2.5.2 Protection of open space: London Plan Policy 2.18, Green Infrastructure, seeks to protect, promote, expand and manage the extent and quality of, and access to, London’s network of green infrastructure. It is important that, as required by this policy, the NEE AAP plans and manages green infrastructure to realise the current and potential value of open space to communities and support the delivery of the widest range of linked environmental and social benefits.
2.5.3 The London Plan includes policies to protect open space and these are:

- Policy 7.16 Green Belt, which states that the strongest protection should be given to London’s Green Belt in accordance with national guidance;
- Policy 7.17 Metropolitan Open Land. The strongest protection should be given to London’s Metropolitan Open Land and inappropriate development refused;
- Policy 7.18 Protecting local open space and addressing local deficiency. The loss of local protected open spaces must be resisted unless equivalent or better quality provision is made within the local catchment area; and
- Policy 7.19 Biodiversity and access to nature. Key considerations for the AAP are to:
  - identify areas deficient in accessible wildlife sites and seek opportunities to address them;
  - ensure sites of European or National Nature Conservation Importance are clearly identified; and
  - identify and protect and enhance corridors of movement, such as green corridors, that are of strategic importance in enabling species to colonise, re-colonise and move between sites.

2.5.4 Core Strategy Policy 33 supports Policy 7.16 by stating that it will continue to protect and enhance Enfield’s Green Belt. This is in turn supported by DMD Policy 82.

2.5.5 Core Strategy Policy 34 supports policies 7.17 and 7.18 by setting out that The Council will protect and enhance existing open space and seek opportunities to improve the provision of good quality and accessible open space in the Borough through a range of means. Those most relevant to the NEE area are:

- protecting Metropolitan Open Land (MOL) and extending its designation to include green chains that meet MOL designation criteria;
- requiring improvements to open space provision through increasing the access to, quantity and quality of publicly accessible open spaces and supporting the community use of non-public open spaces. Priority will be given to addressing areas of deficiency identified in the Enfield Open Space Study, particularly in the south and east of the Borough;
- requiring the provision of new and improved play spaces to address existing deficiencies and to meet future needs, with priority given to those areas where the deficiency of play space is considered most significant as identified in the Enfield Open Space Study; and
- seeking to address deficiencies in allotment provision across the Borough identified in the Enfield Open Space Study, through improving existing allotments, and creating new informal growing spaces.
2.5.6 Core Strategy Policy 36 supports London Plan Policy 7.19 by seeking to protect, enhance, restore or add to biodiversity interests within the Borough. There is an opportunity for the AAP to meet policy requirements by identifying opportunities for improvements to biodiversity within areas in NEE identified as deficient in the Enfield Open Space Study.

2.5.7 The DMD sets out specific policies in relation to the provision of open space, including:
- DMD 72 Open Space Provision, which requires that ALL new major residential development must be accompanied by proposals to improve open space provision;
- DMD 73 Children’s Play Space, which requires developments with an estimated child occupancy of 10 or more within areas deficient in children’s play space to incorporate on-site play provision; and
- DMD 74 Playing Pitches, which resists the loss of playing pitches and expresses a preference for new pitches to be natural grass rather than artificial surfaces.

2.5.8 Lee Valley Regional Park: The OAPF notes that one of the core assets of the area is the Lee Valley Regional Park. New development in the Upper Lee Valley should feel connected to the Park and be part of its unique landscape. Permeability through developments allowing full access to the Park and the waterside will be expected, as is the enhancement of existing water habitats and ecosystems.

2.5.9 The provision of enhanced public access will provide greater access to nature for people. Careful design and incorporation of habitat protection and enhancement measures will be required to ensure that the nature conservation of internationally valued wildlife sites is maintained for people to enjoy.

2.5.10 Within the NEE area, the OAPF identifies a need for improved east-west connections from Ponders End Central through industrial parks to new waterfront development and to sports and leisure facilities at Picketts Lock. The OAPF proposes an ‘urban space’ around Ponders End Station area, connecting with another urban space at Ponders End Central.

2.5.11 The OAPF also seeks to improve strategic links within the NEE area to the LVRP, specifically:
- access from Brinsdown Industrial Estate; and
- improved links from Ponders Lock and Mills to Brinsdown Industrial Estate.

2.5.12 The Core Strategy recognises the unique role of the Lee Valley Regional Park. Both Core Policy 11 Core Policy 12 seek to make the most of this asset, stating that the Council will continue to work with the Lee Valley Regional Park Authority to help develop its Park Development Framework, and with other partners such as British Waterways, and Thames Water to identify the priority mix of additional recreation and leisure facilities in the east of the Borough, particularly at Ponders End, Pickett’s Lock and Meridian Water, and encourage more visitors to the Lee Valley Regional Park.

2.5.13 Core Strategy Policy 35 sets out more detailed policy for the Lee Valley Regional Park and Waterways. It states that the Council will work with the Lee Valley Regional Park Authority, British Waterways, riparian owners, the Environment Agency and other partners to:
- improve access to the Lee Valley Regional Park, particularly from residential communities to the west of the park, focusing on two key areas: Ponders End and Central Leeside. The area action plans will propose specific physical infrastructure and/or urban design in order to deliver improved access in these locations;
- support the work of the Lee Valley Regional Park Authority (LVRPA) to realise the potential of the Lee Valley Regional Park. The Park Development Framework being prepared by the LVRPA will inform the preparation of the North East Enfield Area Action Plan, Central Leeside Area Action Plan and evidence base for review of the Core Strategy; and
- make the best use of the waterway network (part of London’s Blue Ribbon Network) in the Upper Lee Valley, including the River Lee, River Lee Navigation, and the Turkey, Salmons and Pymmes Brooks, seeking to fully restore the waterways and improve their pathways, and facilities for freight, recreational and educational use.

2.5.14 Lee Valley Regional Park Authority Park Development Framework, April 2013: The Park Act, which established the Lee Valley Regional Park Authority, placed a duty on the Authority to develop, improve, preserve and manage the Park, either directly or through others. The Park Authority has produced area proposals to provide greater detail on the appropriate future use and development for the whole of the Park.

2.5.15 The Framework divides the Park into eight areas for the purpose of developing specific proposals based on the Authority’s six strategic aims.

2.5.16 The areas of the Park Development Framework relevant to this AAP are part of Area 4 (northern edge), on the north west boundary of William Girling Reservoir and most of Area 5 covering the areas between Ponders End and the King George V Reservoir in the south through to Romney Marsh in the north which lies immediately south of the M25 motorway. It should be read alongside the Authority’s Vision Aims and Principles document (2010) and the adopted Thematic Proposals (2011) both of which relate to the whole Regional park area and which set the framework for the more detailed proposals.

2.5.17 Area 5 has been divided into five sub-areas, of which 5.A.1, 5.A.2 and 5.A.4 are relevant to the AAP. The relevant Area 4 Proposal is 4.A.3. The sub divisions largely reflect existing and potential visitor nodes and landownership, current and future management and important national and local designations e.g. King George V Reservoir SSSI. The Park wide Adopted Thematic Proposals have been translated on to six area based maps, one representing each theme. These themes include; Visitors; Sport and Recreation; Biodiversity; Community; Landscape and Heritage; and Environment.

2.5.18 These proposals form part of the evidence base for the NEEAAP and should accordingly be considered alongside the AAP policies and proposals.
2.6 Housing

2.6.1 The provision of good quality housing and the improvement of the existing housing stock are key aspects of the Council’s housing policy. At a London-wide level, the Mayor is clear that London desperately needs more homes in order to promote opportunity and real choice for all Londoners, with a range of tenures that meets their diverse and changing needs and at prices they can afford. The key issues for the NEE AAP are:

- delivering new homes;
- securing an appropriate mix of dwellings types and tenure; and
- delivering high quality housing.

2.6.2 Delivering new homes: London Plan Policy 3.3 Increasing Housing Supply sets out a borough-wide minimum target of 5,600 new homes to be provided in Enfield between 2011 and 2021, with an annual target of 560. Boroughs are required to achieve and exceed the minimum annual average housing target. The policy sets out a range of ways in which Boroughs should seek to meet their housing target, including:

- intensification;
- opportunity and intensification areas and growth corridors;
- mixed use redevelopment, especially of surplus commercial capacity and surplus public land; and
- sensitive renewal of existing residential areas.

2.6.3 North East Enfield has limited development opportunities for new housing. However, Core Policy 2 of Enfield’s Core Strategy identifies new housing development of 1,000 new homes across North East Enfield.

2.6.4 London Plan Policy 3.4 Optimising Housing Potential sets out guidelines for density. The policy acknowledges that a blanket application of density ranges for new housing is not appropriate: optimising the potential of development sites should take a range of factors such as local context, design and transport capacity into account. However, the policy sets out recommended densities in relation to the Public Transport Accessibility Level (PTAL) rating and the broad location of sites. Locations are: suburban, urban and central. Much of North East Enfield falls within the ‘suburban’ definition (predominantly residential areas of small building footprints, typically of two to three storeys in height) although the areas surrounding the local centres may be defined as ‘urban’ (areas of dense development such as terraced houses located within 800 metres walking distance of a district centre or along main arterial routes).

2.6.5 Core Strategy Policy 5 states that the density of residential development proposals should balance the need to ensure the most efficient use of land whilst respecting the quality and character of existing neighbourhoods and accessibility to transport and other infrastructure. The London Plan Density Matrix and area action plans for the Borough’s strategic growth areas and the place shaping priority areas within them, will inform the density of proposals for housing developments.

2.6.6 Securing an appropriate mix of dwelling types and tenure: London Plan Policy 3.9 Mixed and Balanced Communities, seeks to ensure a balanced mix of tenures is sought in all parts of London, particularly in some neighbourhoods where social renting predominates and there are concentrations of deprivation.

2.6.7 Core Strategy Policy 5 seeks to ensure that new developments offer a range of housing sizes to meet housing need. Over the lifetime of the Core Strategy the Council will plan for the following borough-wide mix of housing:

- Market housing – 20% 1 and 2 bed flats (1-3 persons), 15% 2 bed houses (4 persons), 45% 3 bed houses , (5-6 persons), 20% 4+ bed houses (6+ persons).
- Social rented housing - 20% 1 bed and 2 bed units (1-3 persons), 20% 2 bed units (4 persons) 30% 3 bed units (5-6 persons) 30% 4+ bed units (6+ persons).

2.6.8 The Council will seek a range of housing types in the intermediate sector, including affordable homes for families. The mix of intermediate housing sizes will be determined on a site by site basis and the Council will work with developers and other partners to agree an appropriate mix taking into account a range of factors including development viability and the affordability of potential users.

2.6.9 DMD Policy 3 supports Core Strategy Policy in seeking a mix of different sized homes.

2.6.10 London Plan Policy 3.11, Affordable Housing Targets, does not set a specific percentage target for affordable housing, leaving this to each individual Borough. The policy states that priority should be accorded to the provision of affordable family housing. The policy also sets out that 60% of affordable housing provision should be for social rent and 40% for intermediate rent or sale.

2.6.11 Core Strategy Policy 3 sets out that the Council will seek to achieve a borough-wide target of 40% affordable housing units in new developments, applicable on sites capable of accommodating ten or more dwellings. For developments of less than ten dwellings, the Council will seek to achieve a financial contribution to deliver off-site affordable housing based on a borough-wide target of 20% affordable housing.

2.6.12 The Council will aim for a borough-wide affordable housing tenure mix ratio of 70% social rented and 30% intermediate provision.

2.6.13 DMD Policy DMD1 reflects the Core Strategy’s policy for a borough-wide target of 40% affordable. It sets out that the borough-wide target is for 70% social rent and affordable rent, and 30% intermediate. However, the supporting text to the policy notes that Evidence shows that sites in the east of the borough are generally not as viable as those in the west.
2.6.14 For some sites located east of the A10 a higher proportion of intermediate housing may be sought, generally a split of 60:40 social/Affordable Rent and intermediate housing in line with the London Plan, if this would assist with viability to maximise delivery of new affordable homes, and contribute towards the creation of sustainable, mixed and balanced communities.

2.6.15 Delivering high quality housing: The London Plan sets out a range of policies that seek to encourage high quality development that meets the needs of a wide range of people, and these include:

- Policy 3.5 Quality and Design of Housing Developments, which includes the minimum space standard requirements for new development;
- Policy 3.6 Children and Young People’s Play and Informal Recreation Facilities, which requires the provision of appropriate outdoor space in new developments; and
- Policy 3.8 Housing Choice, which requires new developments to: offer a range of housing sizes and types; build all new homes to ‘Lifetime Homes’ standards; and design 10% of new homes to be wheelchair accessible.

2.6.16 Core Strategy Policy 4, Housing Quality, reflects the policies set out in the London Plan. It goes on to state that guidance and standards relating to the design, quality, safety, internal and amenity space for new developments will be set out in the Enfield Design Guide and Development Management Document and will be revised to take into account new standards including the Mayor’s draft Housing Design Guide. Area specific design guidance, including design codes and opportunities for exemplar projects and design competitions, will be included in area action plans and related masterplans where appropriate.

2.6.17 DMD Policy 6 sets out requirements in relation to residential character, where proposed development must be of a density appropriate to the locality. The policy states that development will only be permitted if it complies with the London Plan density matrix and the following criteria are met:

- the scale and form of development is appropriate to the existing pattern of development or setting, having regard to the character typologies;
- the development delivers a housing output having regard to policies on housing mix;
- a high quality of design and standard of accommodation is achieved, in line with policies in the London Plan, DMD 8 ‘General Standards for New Residential Development’ and other design policies in the DMD;
- the density of development has appropriately considered existing or planned transport capacity; and
- the density of development takes into account the existing and planned provision of local facilities such as shops, public and private open space, and community, leisure and play.

2.6.18 Development exceeding the London Plan density ranges may be appropriate in the case of developments in the Council’s regeneration areas where this can be justified through the development of a masterplan/planning brief where there are opportunities to comprehensively consider and address the issues. DMD 8 sets out a range of design policies relating to: scale, bulk and massing; daylight and sunlight; London Plan space standards; Lifetime Homes; and so on.

2.7 Social Infrastructure

2.7.1 Social infrastructure covers a wide range of facilities such as health provision, nurseries, schools, colleges and universities, community, cultural, play, recreation and sports facilities, places of worship, fire stations, policing and other criminal justice or community safety facilities and many other uses and activities which contribute to making an area more than just a place to live. The London Plan sets out a range of policies to both protect existing social infrastructure and to encourage and support the provision of new infrastructure.

2.7.2 London Plan Policy 3.16 Protection and enhancement of social infrastructure: In addition to resisting the loss of existing community facilities, this policy requires boroughs to ensure that adequate social infrastructure provision is made to support new developments. The policy states that adequate provision for social infrastructure is particularly important in areas of major new development and regeneration and should be addressed in opportunity area planning frameworks and other relevant area action plans.

2.7.3 The Plan includes policies relating to specific social infrastructure facilities, including:

- Policy 3.17 Health and social care facilities, which support proposals that provide high quality health and social care facilities in areas of identified need, and requires boroughs to address significant health and social care issues facing their area for example by utilising findings from joint strategic needs assessments.
- Policy 3.18 Education Facilities, which positively supports the provision of new schools and requires boroughs to regularly assess the need for education facilities and to secure sites for future provision.
- Policy 3.19 Sports Facilities, encouraging the provision of new facilities and seeks to avoid the loss of existing facilities.

2.7.4 Core Strategy Policy 7 seeks to retain existing health and social care provision. It also identifies infrastructure required to meet the needs of existing and new communities, and states that the Council, working with partners, will plan to deliver specific facilities over the next 15 years. The following facilities are identified for North East Enfield:

- development of a Neighbourhood Health Centre in the Ponders End area;
- potential expansion of Eagle House Surgery, Ponders End as a spoke facility;
- development of a large spoke practice in Innova Park; and
- spoke facility proposed as part of a community hub in Ponders End High Street.
2.7.5 Core Strategy Policy 8 sets out new educational facilities required in the borough. The now complete Oasis Academy Hadley is identified as being required in the NEE area.

2.7.6 Core Strategy Policy 11 seeks to protect existing recreation, leisure, culture and arts provision and promote and encourage the increased use of facilities in the Borough. The policy specifically sets out the requirement to identify the need for new recreation, leisure, culture and arts facilities in the place shaping priority areas, including Ponders End, and setting out arrangements for delivery, including the reconfiguration of existing facilities in appropriate area action plans and masterplans for the place shaping priority areas.

2.7.7 The DMD sets out policies that reflect Core Strategy policy to protect existing facilities and encourage the provision of new facilities, and these are:

- DMD 16 Provision of New Community Facilities;
- DMD 17 Protection of Community Facilities; and
- DMD 18 Early Years Provision.

### 2.8 Retail and Local Centres

2.8.1 The local centres within North East Enfield cater primarily for the day-to-day needs of residents, providing convenience retailing close to where people live and work. Convenience retail expenditure in London as a whole is expected to increase by 1.5 per cent per annum between 2006 and 2031.

2.8.2 The OAPF identifies Ponders End, Enfield Highway and Enfield Wash as town centres within the A1010 growth area. The Plan highlights that renovating the historic shop fronts could improve the experience of high street shopping.

2.8.3 The key parts London Plan Policy 4.8. Supporting a successful and diverse retail sector, relate to local centres, where the policy sets out that LDFs should take a proactive approach to planning for retailing and:

- support convenience retail particularly in District, Neighbourhood and more local centres, to secure a sustainable pattern of provision and strong, lifetime neighbourhoods; and
- provide a policy framework for maintaining, managing and enhancing local and neighbourhood shopping and facilities which provide local goods and services, and develop policies to prevent the loss of retail and related facilities that provide convenience and specialist shopping.

2.8.4 Core Strategy Policy 17 reflects the requirements of London Plan policy by setting out an approach that seeks to strengthen the role of Enfield’s town centres by focusing new commercial, retail, leisure, office, residential and other appropriate social infrastructure related uses, such as police facilities within the centres according to the Borough’s town centre hierarchy. The Council will use the sequential test to direct development to appropriate sites.

<table>
<thead>
<tr>
<th>Status</th>
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<tr>
<td>Large local centre</td>
<td>Enfield Highway</td>
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<td>Enfield Wash</td>
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<td>Ordnance Road</td>
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<td>Ponders End</td>
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<td>Small local centre</td>
<td>Freezywater</td>
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<td>Enfield Island Village</td>
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<td>Local Parades</td>
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<td>Green StreetKempe Road</td>
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<td>South Street</td>
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<td>Southbury Road / Kingsway</td>
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#### Table 2.2: Town Centre hierarchy

2.8.5 The town centre hierarchy identifies the centres within the NEE area according to the hierarchy shown in Table 2.2.

2.8.6 DMD Policy 25 sets out policy in relation to locations for new retail, leisure and office development. For Local Shopping Facilities, the policy states that Proposals for new retail (A1) and A2-5 uses, leisure and other community uses of a scale which provide local shopping facilities and services for communities will be permitted within the boundaries of large local centres, small local centres and local parades, as defined on the Policies Map. Proposed retail development outside of centres will be refused.

2.8.7 DMD Policy 28 provides detail in relation to the change of use from retail (A1) to non-retail on the ground floor. The aim of the policy is to maintain a critical mass of retail within the primary shopping areas, so that the physical continuity and visual appearance of shopping parades is maintained. This policy is in turn supported by DMD Policy 32 (managing the impact of food and drink establishments) and DMD 33 (managing the impact of betting shops).

2.8.8 North East Enfield has two ‘out-of-town’ retail parks. The London Plan notes that such retail parks are heavily dependent on the use of the private car, and states that they should be managed in ways that reduce this dependency and improve public transport, cycling and pedestrian access. The OAPF notes that parts of the area have poor access to district and major town centres but good access to out of centre shopping provision mostly in the form of retail parks. The Plan identifies an opportunity to reconfigure retail parks to support the creation of new places and communities, for example with housing above retail.

2.8.9 Core Strategy Policy 18 seeks to protect retail uses in town centres. However, the policy states that, where it can be demonstrated through the sequential test that retail development cannot be accommodated in or on the edge of the Borough’s centres, appropriate development could be directed to existing retail parks. If it can be demonstrated, following an impact assessment that there will not be a negative impact on a) the vitality and viability of existing centres, b) planned investment in centres, and c) that the development increases the overall sustainability and accessibility of the retail park in question.
2.9 Transport

2.9.1 The overall transport objective of the London Plan is that London should be a city where it is easy, safe and convenient for everyone to access jobs, opportunities and facilities. As set out in this Baseline Update Report, transport is one of the biggest challenges facing North East Enfield. There are problems of traffic congestion, poor rail services, a lack of east-west connectivity (especially for buses) and a poor environment for pedestrians and cyclists. Transport policy is considered in this section under the following headings:

- public transport;
- walking and cycling; and
- road network.

2.9.2 Public transport: London Plan Policy 6.1 Strategic approach sets out the overall aim of closer integration of transport and development. It identifies specific transport schemes, and those of particular relevance to North East Enfield are the following rail projects:

- West Anglia: Twelve-car capability to Stansted and Cambridge, additional capacity also on inner services. An anticipated completion dates of 2010-2012 is shown.
- West Anglia: Lee Valley four-tracking leading to increased frequencies to Stansted and local service to Stratford. The anticipated completion date is shown as post 2020.

2.9.3 The policy also identifies other ways in which transport can be improved, including:

- seeking to improve the capacity and accessibility of public transport, walking and cycling;
- supporting measures that encourage shifts to more sustainable modes and appropriate demand management; and
- promoting walking by ensuring an improved urban realm.

2.9.4 The OAPF notes that the twin-tracked nature of the Main Line constrains the ability to improve the frequency and capacity of stopping services without adversely affecting journey times for the 'fast' longer distance services. As a result, many stations that are well placed geographically to serve the Opportunity Area receive only a low frequency service. This is a major constraint to growth.

2.9.5 A four train per hour (4tph) service on the West Anglia Main Line is set out in the OAPF as an agreed goal that can be achieved through the introduction of additional tracks on land to the east of the existing tracks (3/4 tracking) to allow more frequent local trains to operate independently of faster services. Any additional infrastructure could largely be accommodated within the existing railway lands.

2.9.6 The rail industry is development a phased programme of enhancements, starting with the STAR scheme. This will introduce a 4tph service between Stratford, Tottenham Hale and Angel Road to the south of the NEE area. Powers over the West Anglia suburban networks will be devolved to the Mayor and TfL by the end of 2015, allowing significant improvements to be made to the quality of stations and services. TfL is also working with Network Rail to consider opportunities for 3/4 tracking further up the Lee Valley within the NEE area, which would continue to unlock opportunities for regeneration in the Opportunity Area.

2.9.7 London Plan Policy 6.2 seeks to provide for public transport capacity and safeguard land for transport. The proposals for four tracking of the West Anglia line within the North East Enfield area mean that this policy is particularly relevant where it requires boroughs to identify and safeguard sites, land and route alignments to implement transport proposals that have a reasonable prospect of provision.

2.9.8 The precise land take requirements of the West Anglia are not yet known, but the AAP can go some way to highlighting the need for this issue to be considered.

2.9.9 Core Strategy Policy 26 sets out that The Council, working with its partners, will seek to secure a comprehensive, safe, accessible, welcoming and efficient public transport network, capable of supporting the development proposals for the Borough and providing attractive alternative travel options. The policy goes on to set out ways in which this will be achieved, including the following that are relevant to North East Enfield:

- supporting proposals to upgrade the West Anglia Rail line in the Lee Valley to enable a four trains per hour service at local stations in Enfield;
- improving access to and safety of railway and underground stations, as well as associated environmental works to make these more attractive and welcoming. Ponders End is highlighted as a priority for accessibility improvements;
- improving public transport interchanges to facilitate better wayfinding, integration between modes including provision for taxis, water based transportation and cycle parking and storage. Ponders End is highlighted as a priority; and
- working with Transport for London to enhance bus provision to offer a realistic alternative to the private car, focusing on areas with poor public transport accessibility, particularly in the Upper Lee Valley and orbital bus services. This will include new and diverted services, improving bus stop accessibility, reducing walk access time and improving safety.

2.9.10 Core Strategy Policy 24 relates to the road network, and acknowledges the need to consider the impact of 3-4 tracking on traffic movement by stating that the Council will work with the Department for Transport, Transport for London and Network Rail to ensure adequate alternative arrangements are provided in association with any closure of level crossings on the West Anglia Main Line in association with increased rail service frequencies.
2.9.11 **Walking and Cycling**: London Plan Policy 6.10 Walking sets out ways in which walking can be encouraged, particularly for short trips. Key considerations for the AAP are to:

- identify, promote and complete the relevant sections of the strategic walking routes shown in the London Plan, as well as borough routes;
- identify and implement accessible, safe and convenient direct routes to town centres, transport nodes and other key uses; and
- encourage a higher quality pedestrian and street environment, including the use of shared space principles such as simplified streetscape, decluttering, and access for all.

2.9.12 The OAPF notes that the extensive pedestrian network is compromised by missing key links and/or a poor environment which serve to isolate key development areas. The major challenge for walking is to improve its attractiveness for shorter trips which can be achieved by improving pedestrian environments, making routes more easily recognisable and improving safety to centres and transport nodes.

2.9.13 London Plan Policy 6.9 Cycling sets out a range of requirements. Key considerations for the AAP are to:

- identify, promote and facilitate the completion of the relevant sections the Cycle Super Highways as well as borough routes; and
- identify and implement safe and convenient direct cycle routes to town centres, transport nodes and other key uses such as schools.

2.9.14 The OAPF notes that the Lee Valley Regional Park connects the growth areas of the Opportunity Area and has potential to act as a catalysts for the continued uptake of both recreational and day-today cycling. Dedicated cycle paths and greenways are well used, particularly along the river towpaths, and offer an uninterrupted network across the valley except at Central Leeside. However, infrastructure and the pattern of industrial land use can make cycling difficult in the Upper Lee Valley. Interventions are needed to overcome barriers and foster a stronger culture of cycling to meet and exceed the Mayor’s target for a cycling modal share of 5% by 2026.

2.9.15 Core Strategy Policy 25 states that the Council, working with its partners, will seek to provide safe, convenient, and accessible routes for pedestrians, cyclists and other non-motorised modes. Priority will be given to schemes that overcome community severance, particularly those linking communities on either side of the West Anglia Main Line, routes to schools, town centres and recreational resources including greenways and the Lee Valley Regional Park.
2.9.16 **Road Network:** The Core Strategy identifies a range of key transport issues, including specific problems relating to the road network in North East Enfield:

- continued growth in the volume of traffic using the network is placing increasing pressure on the available capacity and planned growth will need to consider and mitigate this pressure;
- a lack of good quality east-west links, limiting movement and access to jobs and services; and
- the need for good access to the strategic road network to support the needs of business and industry away from residential neighbourhoods.

2.9.17 **London Plan Policy 6.12 Road Network Capacity** sets out that the Mayor supports the need for limited improvements to London’s road network, whether in improving or extending existing capacity, or providing new links, to address clearly identified significant strategic or local needs.

2.9.18 The OAPF states that indirect access to the M25 has an adverse effect on the perceived road accessibility to the Opportunity Area, as well as more specifically congestion, pollution, amenity and safety on A1055 Bullsmoor Lane in the northern part of the NEE area. The OAPF identifies five junctions in the NEE area that are causing delay, two of them significant. As a result of increases in traffic and reductions in average speed, the OAPF anticipates a notable worsening of junction performance by 2031.

2.9.19 The OAPF states that the road network will continue to play an important role in accommodating a variety of transport modes and providing access to areas of growth. However, congestion is anticipated to worsen and will remain a challenge on many of the Upper Lee Valley’s roads. TfL wishes to see the A10, A1010 and A1055 managed as a single corridor, with an understanding of how these three routes interact with one another.

2.9.20 Supporting the transportation of freight will help support growth in the Opportunity Area, and ensuring good quality national and regional links, especially along the A406 and towards the M25, is central to this. The OAPF stresses that a long-term solution to issues of poor highway connectivity to the M25 should be developed, and notes that TfL and Enfield Council are working collaboratively to determine the most appropriate transport solution to this issue.

2.9.21 **Core Strategy Policy 24** states that the Council, working with partners, will seek to deliver improvements to the road network to contribute to Enfield’s economic regeneration and development, support businesses, improve safety and environmental quality, reduce congestion, and provide additional capacity where needed. Priorities for improvements within and adjacent to the NEE area are:

- A1055 Bullsmoor Lane / Mollison Road / Meridian Way;
- A10 Great Cambridge Road;
- A1010 Hertford Road; and
- to improve accessibility to the Upper Lee Valley, particularly east-west connections, linking areas on either side of the West Anglia rail line.

2.9.22 The policy also states that the Council will work with partners to continue to consider the potential merits, benefits and impacts of a Northern Gateway Access Package (NGAP) to improve accessibility and movements within north east Enfield and to support existing and new businesses in the Upper Lee Valley.

2.9.23 NGAP is at an early stage of feasibility and it will continue to be developed and tested against the criteria in London Plan Policy 6.12:

- the contribution to London’s sustainable development and regeneration including improved connectivity;
- the extent of any additional traffic and any effects it may have on the locality, and the extent to which congestion is reduced;
- how net benefit to London’s environment can be provided;
- how conditions for pedestrians, cyclists, public transport users, freight and local residents can be improved; and
- how safety for all is improved.

2.10 **Design and Character**

2.10.1 The Council’s key aim is to build on the positive characteristics of the Borough, while addressing those areas and issues that would benefit from improvement.

2.10.2 The overall aspiration of London Plan Policy 7.4 Local Character is to secure development that has regard to the form, function, and structure of an area, place or street and the scale, mass and orientation of surrounding buildings. It should improve an area’s visual or physical connection with natural features. In areas of poor or ill-defined character, development should build on the positive elements that can contribute to establishing an enhanced character for the future function of the area. It encourages Boroughs to consider the different characters of their areas to identify landscapes, buildings and places where that character should be sustained, protected and enhanced through managed change.

2.10.3 The OAPF notes that there are relatively few existing tall buildings in the Upper Lee Valley. Those that are there contribute little to the legibility of the area or its sense of place as they do not relate to the role and function of the area – i.e. are not within town centres or at major transport nodes. The OAPF identifies the Ponders End area at South Brimsdown as having potential as a location for tall buildings.
2.10.4 Core Strategy Policy 30 seeks to maintain and improve the quality of the built and open environment. The AAP should respond to the policy's requirement to build on and extend the Enfield Characterisation Study to investigate wider urban design issues and identify:

- poor quality environments where improvements are needed;
- opportunities for strategic design interventions that will significantly enhance people's;
- experience of the Borough;
- areas of distinctive quality that warrant protection, but that do not meet the standards for conservation area designation;
- areas appropriate, inappropriate and sensitive to tall buildings, including consideration of the strategic growth areas located in the Upper Lee Valley Opportunity Area. These areas will be mapped and policies will be developed as part of the Development Management DPD;
- important strategic and local views; and
- opportunities for enhancing local distinctiveness, including that of the historic settlements which make up the Borough.

2.10.5 DMD Policy 37 encourages good design, setting out objectives in relation to character; continuity and enclosure; quality of the public realm; ease of movement; legibility; adaptability and durability; and diversity. For planning applications requiring a Design and Access Statement, DMD Policy 38 sets out requirements for clearly documenting the design evolution and rationale behind the proposal.

2.10.6 DMD 39 sets out specific guidance in relation to the design of business premises. Given the large amount of land in employment use within North East Enfield, this policy is especially relevant. The policy states that all new business premises must make efficient use of land and maximise their contribution to the urban environment. Development must meet all of the following criteria and will only be permitted if it:

- facilitates movement through the provision of suitably located, safe, naturally lit and publicly accessible routes;
- positively addresses the public realm: publicly accessible and more active areas should front the public realm and be located close to the site entrance. Building entrances should be prominently located and clearly indicated through the architecture and/or massing of the building. The amount and location of fenestration, landscaping, means of enclosure, architectural detailing and lighting should all help to create a pleasant and safe environment for pedestrians, cyclists and vehicles at all times of the day;
• clearly differentiates between public and private areas and respects any appropriate, existing building lines. In the absence of such a feature, the development should establish one;
• provides inclusive access arrangements and encourages commuting via cycle and foot, and where possible provide supporting facilities such as showers and lockers;
• wherever possible, locates servicing, parking and refuse to the rear, sensitively locating and screening these where visible from the public realm;
• is flexibly designed so as to be suitable for a number of different businesses and to facilitate conversion to alternative uses, subdivision and/or amalgamation of units;
• through layout, landscaping and other site features, helps to mitigate the potential for negative impacts on surrounding uses, including consideration of access arrangements for different uses within the site and wider area;
• ensures that the massing and facades of buildings are made visually interesting through architectural detailing, height variation and fenestration. Consideration will need to be given to how the development will appear when viewed from the surroundings and in long views;
• respects the grain and character of the surrounding area, for example by wrapping larger buildings in smaller units to maintain activity, character and visual interest; and
• uses materials that are high quality and considers how, through the use of local materials and those used in surrounding buildings, a distinct character and area identity can be created, enhanced or preserved.

2.10.7 London Plan Policy 7.4 Public Realm sets out an aspiration for London’s public spaces to be secure, accessible, inclusive, connected, easy to understand and maintain, relate to local context, and incorporate the highest quality design, landscaping, planting, street furniture and surfaces. The policy encourages borough to develop local objectives and programmes for enhancing the public realm. This is reflected by Core Strategy Policy 30, which requires all developments and interventions in the public realm to be of high quality and design-led, having special regard to their context.

2.10.8 The River Lee Navigation and the reservoirs are defining features of the eastern part of the AAP area. London Plan Policy 7.30 requires new development along waterspaces to respect their local character and contribute to their accessibility and active water related uses. There is an opportunity for the AAP to identify local opportunities to increase local distinctiveness, particularly with regard to the River Lee Navigation and Ponders End Waterfront. This policy is supported by DMD Policy 75, which also states that Industrial/ commercial development which is exposed to a waterway should address the waterway and create pleasant and interesting views from that waterway. The buildings
should take architectural cues from existing heritage features and should provide an attractive, and where possible, active façade to encourage passive surveillance. Public access to the waterfront should be retained or introduced. Access for staff must be maintained as a minimum.

2.11 Sustainable Energy

2.11.1 The Mayor supports the greater use of renewable and low carbon generation technologies, and has set a target for London to generate 25 per cent of its heat and power requirements through the use of local, decentralised energy (DE) systems by 2025. These will predominantly be based around the use of gas-fired combined heat and power (CHP), district heating and cooling in the first instance. DE generates power at point of use, making more efficient use of primary energy by utilising generated heat that would otherwise be wasted in large-scale thermal power generation plants.

2.11.2 The OAPF notes that there is a unique opportunity to deliver a sustainable heat network which would put the Upper Lee Valley at the forefront of sustainable energy supply in London and give it a clear competitive advantage over other areas.

2.11.3 An Upper Lee Valley steering group has been established to maximize the opportunities for developing a Lee Valley Heat Network within the Opportunity Area. The OAPF identifies the Edmonton Eco Park is the preferred location as the supply hub for the Lee Valley Heat Network, where best use can be made of existing generating facilities. The Council is working with partners to bring forward a sub-regional district heating system, initially as part of the Alma Estate Regeneration and ultimately serving a much wider area. This strategy accords with the following London Plan policies:

- Policy 5.5 Decentralised energy networks. The policy requires boroughs to develop policies and proposals to identify and establish decentralised energy network opportunities.

- Policy 5.6 Decentralised energy in development proposals. The policy encourages proposals to connect to existing or planned DE networks and/or to provide Combined Heat and Power (CHP) systems.

- Policy 5.7 Renewable energy. The policy supports and encourages the use of renewable energy sources subject to minimising any potential adverse impacts on biodiversity, the natural environment and historical assets, and air quality.

- Policy 5.8 Innovative energy technologies. The policy supports a range of innovative technologies, and encourages boroughs to develop more detailed policies within their LDFs.

2.11.4 The DMD sets out policies in relation to sustainable design and construction, DMD Policy 50 sets out Code for Sustainable Homes and BREEAM standards for new buildings and conversions. Major new build residential development should exceed Code Level 4 up to the end of 2015, and from 2016 onwards should reach Code Level 5 and be moving towards zero carbon. Major non-residential development must achieve BREEAM ‘Very Good’ up to the end of 2015, ‘Excellent’ from 2016 – 2018 and be moving towards and ‘outstanding’ rating from 2019 onwards.

2.12 Land for Food

2.12.1 Enfield has a long history of food production. In the late nineteenth century, the Lee Valley was the most important concentration of glasshouse (market gardening) industry in the world. Although diminished, the glasshouse industry survived in Enfield into the late 1960s. There is a resurgence of interest in food production, reflected in both regional and local planning policy.

2.12.2 London Plan Policy 7.22 Land for Food seeks to encourage and support farming and land-based sectors in London, particularly in the Green Belt, as well as the use of land near to urban communities. Boroughs are required to protect existing allotments and encourage to identify other potential spaces that could be used for commercial food production or for community gardening. This is supported by DMD Policy 85 which states that the use of land for growing food, including commercial and community food growing, will be supported throughout the borough.