

# Core Strategy Issues and Options and Preferred Options: Statement of Consultation

*In accordance with regulation 30(d) of the Town and Country Planning (Local  
Development) (England) (Amendment) Regulations 2008*



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## LIST OF ACRONYMS

AAP	Area Action Plan
AMR	Annual Monitoring Report
BSF	Building Schools for the Future
BW	British Waterways
CAA	Conservation Area Appraisal
CAG	Conservation Advisory Group
CL	Central Leaside
CLG	Department of Communities and Local Government
CP	Core Policy
DPD	Development Plan Document
EA	Environment Agency
EH	English Heritage
ESP	Enfield Strategic Partnership
ET	Enfield Town
EU	European Union
GLA	Greater London Authority
GOL	Government Office for London
HA	Highways Agency
HAF	Housing Association Forum
HBF	Home Builders Federation
HCA	Homes and Communities Agency
HMA	Housing Market Assessment
IBP	Industrial Business Park
IDP	Infrastructure Delivery Plan
LB	London Borough of ...
LDA	London Development Agency
LDF	Local Development Framework
LIP	Local Implementation Plan
LFEP	London Fire and Emergency Planning Authority

LSC	Local Skills Council
LSES	Locally Significant Employment Site (old term)
LSIS	Locally Significant Industrial Site
LLFRM	Lower Lee Flood Risk Management
LVRPA	Lee Valley Regional Park Authority
MPA	Metropolitan Policing Authority
NC	North Circular
NE	Natural England
NEE	North East Enfield
NGAP	Northern Gateway Access Package
NGAR	Northern Gateway Access Road
NLCC	North London Chamber of Commerce
NLSA	North London Strategic Alliance
NLSRDF	North London Sub Regional Development Framework
NLWA	North London Waste Authority
NLWP	North London Waste Plan
NR	Network Rail
OAPF	Opportunity Area Planning Framework
PCT	Primary Care Trust
PIA	Primary Industrial Area (old term)
PIL	Preferred Industrial Location
PPG 2	Planning Policy Guidance 2: Green Belts
PPG 13	Planning Policy Guidance 13: Transport
PPS 12	Planning Policy Statement 12: Local Spatial Planning
PPS 25	Planning Policy Statement 25: Flood Risk
PTAL	Public Transport Accessibility Level
SA	Sustainability Appraisal
SCI	Statement of Community Involvement
SEL	Strategic Employment Location (old term)
SFRA	Strategic Flood Risk Assessment
SHLAA	Strategic Housing Land Availability Assessment

SHMA	Strategic Housing Market Assessment
SIL	Strategic Industrial Location
SO	Strategic Objective
SPG	Supplementary Planning Guidance
SPZ	Source Protection Zone
SRN	Strategic Road Network
SSSI	Site of Special Scientific Interest
TAG	Thematic Action Group
TCFMP	Thames Catchment Flood Management Plan
TfL	Transport for London
TLRN	Transport for London Road Network
TW	Thames Water
UDP	Unitary Development Plan
ULV	Upper Lee Valley
ULVOA	Upper Lee Valley Opportunity Area

## 1.0 Introduction

1.1 This statement sets out the details of community involvement undertaken during the preparation of the Core Strategy Pre-Submission Report (Pre-Submission Report) as required under regulation 30 (d) of the Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008.

1.2 The two stages included:

### Issues and Options

The Council identified key issues and alternative options. An Issues and Options Report was published for consultation from 18 April to 13 June 2007. This was followed by ongoing consultation.

### Preferred Options

Taking into account the results of consultation on issues and options the Council developed preferred options. The Preferred Options Report was published for consultation from 13 February to 26 March 2008.

This was followed by ongoing consultation, including publication of further preferred options for the Core Strategy on the strategic growth areas in the form of a 'Strategic Growth Areas Report'.

1.3 The consultation completed for the Issues and Options report and the Preferred Options report were in accordance with regulations 25 and 26 of the Town and Country Planning (Local Development) (England) Regulations 2004.

1.4 In accordance with the transitional arrangements, consultation undertaken under regulations 25 and 26 of the Town and Country Planning (Local Development) (England) Regulations 2004 is considered to meet the requirements set out under regulation 25 the Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008.

1.5 All consultation has also been in accordance with Council's Statement of Community Involvement (SCI) which was adopted in June 2006.

## 2.0 Issues and options consultation

- 2.1 An issues and options report was published for consultation from 18 April to 13 June 2007. This was followed by on-going consultation.

### Bodies consulted

- 2.2 In line with the requirements of regulation 25 (1) (a) and (b) of the Town and Country Planning (Local Development) (England) Regulations 2004, 'specific' and 'general' bodies were consulted on the Issues and Options Report. A list of these bodies and the consultees is set out in **Appendix A**.
- 2.3 All contacts on Council's Local Development Framework (LDF) database, which covers a range of organisations and individuals, were notified of the publication of the Core Strategy Issues and Options Report. 1100 individuals and organisations were notified, including specific, general and other consultation bodies, and internal officers and councillors. A list of 'other' consultees is also included in **Appendix A**.

### How bodies were consulted

- 2.4 The Issues and Options Report was made available online, and paper copies were available at all Council's libraries and at the Civic Centre.
- 2.5 The document was published online through Limehouse consultation software 18 April 2007.
- 2.6 Emails and letters were sent 24 April 2007 to specific, general and other consultees informing them of the scope of the document, a link to a copy of the document online and the deadline by which comments had to be submitted. Consultees were also informed of ways of submitting comments which included using Limehouse online consultation software.
- 2.7 An event was held for Enfield Strategic Partnership's Thematic Action Groups (ESP TAGs) on 18 April 2007, allowing members to comment on the Issues and Options Report at the event itself, while a letter to participants informed them of how to submit further comments.
- 2.8 The Issues and Options Report was publicised at an ESP Management Group meeting held 25 April 2007 and an Enfield Strategic Partnership Engagement Group meeting, held 2 May 2007. TAG link officers were asked to disseminate information to other TAG groups.
- 2.9 Copies of the document were made available at a meeting of the developers' forum, held 27 April 2007.
- 2.10 A Conservation Advisory Group (CAG) meeting was held on 3 May 2007. This group consisted of councillors and representatives of Enfield conservation groups who advise on conservation matters.
- 2.11 A press release publicising the Issue and Options Report was issued 1 May 2007. A copy is included in **Appendix B**.

2.12 A themed forum was held 29 October 2007 where discussions addressed green spaces, housing, employment and retail, and a talk was given on the wider determinants of health. Officers from the planning policy team and representatives from a range of voluntary and community groups in the Borough attended.

### Summary of main issues and how they have been taken into account

2.13 A total of 60 responses were received (respondents listed in **Appendix C**) from a range of local residents, voluntary and community groups, developers and government organisations during the publication period.

2.14 The table below illustrates how the main issues raised during the consultation process informed the **Preferred Options Report**. A copy of all written representations received during the publication period is included in a separate volume - **Appendices H - J**.

Section & Topic	Summary of main issues	Outcome/ Relevant section/CP in the Preferred Options Core Strategy document
<p><b>2.4</b> The Triple Arc</p>	<p>Support for the 'Triple Arc' description of broad issues, but not applied geographically to particular parts of the Borough.</p>	<p><i>3.1: The Spatial Strategy</i>                      'Triple Arc' modified so the Spatial Vision is based on three values that are relevant across the Borough as a whole:</p> <ul style="list-style-type: none"> <li>▪ Making best use of the Borough's natural resources.</li> <li>▪ Retaining and improving its pleasant suburban townscapes.</li> <li>▪ Revitalising its communities, and creating new ones, where needed.</li> </ul>
<p><b>2.5</b> Spatial Objectives</p>	<ul style="list-style-type: none"> <li>▪ General support for the Upper Lee Valley (ULV) Vision.</li> <li>▪ Support for the provision of new housing in the ULV, close to public transport links, and in town centres.</li> <li>▪ Urgent need to prioritise intervention in the south east of the Borough, take prompt action to arrest decline in the east and south west.</li> </ul> <p>Concerns were raised regarding infrastructure provision, water resources and flooding.</p> <p>Need for a good range of educational, health, social, cultural and recreational facilities.</p> <ul style="list-style-type: none"> <li>▪ Improve the quality of the built</li> </ul>	<p><i>3.3: The Spatial Strategy</i></p> <ul style="list-style-type: none"> <li>▪ The focused growth strategy would facilitate planned growth and regeneration in the ULV and select town centres. Interventions will offer opportunities to improve the quality of life for Enfield residents.</li> <li>▪ A dispersed growth approach would not optimise the benefits which need to be procured from that growth, and would put areas of good built and open environment at risk from ad hoc development proposals.</li> </ul> <p>The focused growth approach would avoid a reactive and ad hoc approach to problems and pressures arising from new development and thus allow a thorough consideration of the infrastructure and facilities needed to support growth. The Council and its partners will seek to ensure that social and utility infrastructure is provided, retained, improved or expanded where needed.</p> <p>Infrastructure delivery is now addressed in <i>CP46: Infrastructure Contributions</i> of the Pre-Submission Report.</p> <p>Focused growth would safeguard the quality</p>

Section & Topic	Summary of main issues	Outcome/ Relevant section/CP in the Preferred Options Core Strategy document
	<p>environment, quality of life and reduce crime.</p> <ul style="list-style-type: none"> <li>▪ Protect biodiversity, reduce pollution and improve the environment where major new road proposals are agreed.</li> <li>▪ Consider the long term future of Enfield's historic suburban areas and have regard for built heritage.</li> <li>▪ Any proposed intensification of residential areas needed to be considered against clear criteria on a case by case basis and to be sustainability-led.</li> </ul>	<p>of built and open environments and allow them to be enhanced.</p>
	<ul style="list-style-type: none"> <li>▪ Improve the provision of retail floorspace, focusing on ET (ET).</li> <li>▪ A good balance of activities in town centres, with some higher density development, while protecting local centres.</li> </ul>	<p>Chapter 8: Retailing, Leisure and Culture seeks:</p> <ul style="list-style-type: none"> <li>▪ A full range of appropriate activities will be sought for the town centres, and important local centre functions will be protected.</li> <li>▪ A focus on proposals for large scale retail and leisure development with a catchment area covering a large part of the Borough in the major town centre, Enfield Town.</li> </ul>
	<ul style="list-style-type: none"> <li>▪ Reduction of congestion, improved traffic flows and better parking.</li> <li>▪ Promotion of more sustainable modes of transport, better public transport provision and a focus on walking and cycling.</li> </ul>	<p>Focused growth would allow the Council and its partners to plan for improved transport infrastructure, including local schemes to improve public transport, cycling and walking.</p>
<p><b>4</b> Environmental Resources</p>	<p>Given existing capacity/ operational issues and water supply infrastructure, new development should take into consideration the availability of existing water resources.</p>	<p><i>CP4: Managing heat island effects and pressures on water resources</i>                      CP4 seeks to ensure Enfield's future water resource requirements will be managed effectively in a coordinated manner.</p>
	<p>Policy should consider efficiency and management issues, as well as sustainability measures in development. Improvement in water management is vital to ensure canals can remain open throughout the year.</p>	<p>CP4 emphasises a managed and coordinated approach to water resources. The Enfield Design Guide will provide design advice on methods to manage water.</p>
	<p>Appropriate targets are needed for reducing pollution and the means to achieve this.</p>	<p><i>CP5: Air, water, noise and light pollution and contaminated land</i>                      The justification to CP5 states there are EU air quality targets which are binding upon national governments, while the Mayor is required to reduce the levels of pollutants in London's air to achieve this.</p>
	<p>There must be progress towards improved water status in line with the EU Water Framework Directive because poor water quality is a problem in parts of the Borough, often due to sewerage issues.</p>	<p>CP5 emphasises the prevention of environmental problems and seeks to ensure a reduction in water pollution.</p>
	<p>Water quality can be improved through</p>	<p>The preventative approach advocated by</p>

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	design and management measures.	CP5 reflects the need for design and management measures to improve water quality. More detailed design measures to address water quality will be incorporated into the Enfield Design Guide.
4.3 Biodiversity	<ul style="list-style-type: none"> <li>▪ Regional sport, recreation, leisure activities, nature conservation, moorings, marinas and associated facilities should be permitted in the green belt, particularly in the Lee Valley; this would help promote economic regeneration.</li> <li>▪ More effective use should be made of the water resources in the Lee Valley.</li> </ul>	<p><i>CP21: Biodiversity</i>                      States that the Council will work with other bodies to make the best use of the waterway network in the ULV.</p>
4.2 Sustainable Design & Construction 4.4 Renewable Energy	<ul style="list-style-type: none"> <li>▪ Views were mixed on whether the Plan should reflect the Code for Sustainable homes or higher standards, while higher standards should be applied to commercial developments.</li> <li>▪ Flexibility and feasibility should be considered when applying sustainable design and construction policies.</li> </ul>	<p><i>CP2: Sustainable design and construction; energy; and combined cooling, heat and power</i>                      All forms of new development will be required to demonstrate high standards of sustainable design and construction, in line with London Plan policies.</p>
	Aesthetic impacts of sustainable design and construction should be considered, as well as standards for landscaping. A variety of water-related sustainability measures should be considered.	Sustainable design and construction policy and guidance will be further developed in the Development Management DPD and the Enfield Design Guide.
	Some support for the provision of renewable energy.	<p>CP2 seeks to increase the amount of energy generated from renewable sources and promote decentralised energy systems where feasible.</p> <p>The Council will aim to reduce carbon dioxide emissions by 20% through on-site renewable energy generation, in line with the London Plan.</p>
4.6 Managing Flood Risk	<p>Mixed views on whether the new plan should, in areas of high flood risk, strongly resist more vulnerable uses or assess the scope for reducing and mitigating the problems of flooding.</p> <p>A variety of measures should be considered to reduce flood risk and facilitate river restoration, including addressing the problem of run off, identifying sites for Sustainable Urban Drainage Systems and the requirements of the Environment Agency.</p>	<p><i>CP3: Flooding</i>                      Council, working with its partners, will resist developments that are vulnerable to flooding due to their siting and use. A precautionary approach to flooding will ensure that risk is avoided where possible and managed in other cases.</p> <p>A precautionary approach will ensure that risk is managed where it cannot be avoided. Features to reduce flood risk in new development will be included in the Enfield Design Guide and Area Action Plans (AAP).</p>

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	All Enfield's waterways should be referred to, as well as key waterways documents. Relevant assessments should be carried out and used to inform planning decisions.	CP3 applies to all Enfield's waterways. A Strategic Flood Risk Assessment (SFRA) has now informed the Pre-Submission Report.
4.7 Waste	Policies for waste management should reflect national guidance and London Plan policies.	<p><i>CP7 &amp; 8: Waste management</i></p> <p>CP7 seeks to meet and exceed the waste management targets set in the London Plan.</p> <p>CP8 seeks to support proposals for additional waste management facilities required to provide for the London Plan's waste apportionments. It also seeks to ensure that more sustainable transport modes, such as rail and water, be utilised in the transportation of waste.</p>
	More efficient waste management should be considered through consolidation centres and transfer by public transport. Transport of waste by water should be encouraged.	CP7 advocates the grouping of facilities so activities complement each other, while the preferred option for Core Policy 8 seeks to ensure that more sustainable transport modes, such as rail and water, be utilised in the transportation of waste.
4.8 Aggregates	The King George V reservoir offers potential for employment generation as a tourist location that outweighs the advantages of dredging.	<p><i>CP6: Aggregates</i></p> <p>Aggregates for building are important to the UK economy so there needs to be an adequate and sustained supply within the limits set by the environment. To conform with the London Plan (Policy 4A.5) and Minerals Policy Statement 1, the LDF must identify and safeguard aggregate resources suitable for extraction and support the better use of aggregates.</p>
	The transportation of waste, building materials and aggregates by water should be encouraged.	<p>CP6 supports enhanced handling facilities. The Council will seek to minimise the movement of aggregates by road and their movement by water.</p> <p><i>CP34: Freight</i> also supports transportation of goods via water.</p>
5.1 Green Belt	<ul style="list-style-type: none"> <li>▪ The green belt should continue to be protected and enhanced.</li> <li>▪ Some respondents called for a strategic review of the green belt in the Borough whilst others preferred a review of the detailed green belt boundary in the Picketts Lock area, in the vicinity of the North Circular (NC) Road and in the Ridgeway and Beech Hill areas.</li> </ul>	<p><i>CP19: Green Belt &amp; Countryside</i></p> <p>CP19 emphasises the Council's commitment to protect and enhance the green belt. In line with PPG2, only minor changes to the green belt boundary have been proposed in the Pre-Submission Report Proposals Map.</p> <p>The green belt will be reviewed as part of the Development Management DPD.</p>
	<ul style="list-style-type: none"> <li>▪ Green belt policy needs to address the needs and diversification of the farming industry, new uses in the green belt should be assessed against criteria including impact on the landscape and environment.</li> <li>▪ The role of green belt and other open space for the location of essential utilities such as water and</li> </ul>	CP19 commits the Council to set out criteria for the consideration of development proposals in or visible from the green belt. It also sets out criteria for supporting well conceived farm diversification schemes that contribute to sustainable development objectives and the protection and enhancement of the landscape.

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	<p>sewage treatment needs to be recognised.</p> <ul style="list-style-type: none"> <li>▪ A proactive approach is needed for the future of major developed sites in the green belt such as Middlesex University's Trent Park campus and Picketts Lock, addressing issues such as improving accessibility and employment opportunities.</li> <li>▪ The economic potential of the Crews Hill area should be recognised whilst retaining its green belt status.</li> <li>▪ Regional sport, recreation, leisure activities, nature conservation, moorings, marinas and associated facilities should be permitted in the green belt, particularly in the Lee Valley, and would help promote economic regeneration.</li> </ul>	<p>The Development Management DPD will set out criteria for assessing proposals to diversify farm units, and other new uses in the green belt, in the context of PPG2 and including criteria such as the potential impact on the landscape and criteria for assessing development proposals on the urban edge or visible from the green belt.</p> <p><i>CP33: Green Belt and Countryside</i> (of the Pre-Submission Report) recognises that utility companies may need to carry out statutory functions in the green belt.</p> <p>Council will set out criteria for assessing future development in the Crews Hill area and the major developed sites of Trent Park campus and Picketts Lock whilst retaining their green belt status. The Council will work with the Lee Valley Regional Park Authority (LVRA), British Waterways (BW), riparian owners and other stakeholders to make the best use of the waterway network in the ULV.</p> <p>There was no support for the exclusion of Crews Hill from the green belt so this option was rejected in favour of a proactive approach to recognising the area's economic potential whilst retaining its green belt status, also supported by the Sustainability Appraisal (SA).</p>
<p><b>4.5</b> Waterways <b>5.2</b> Metropolitan Open Land <b>5.3</b> Open Spaces <b>5.4</b> Playing Pitches &amp; Indoor Sports Facilities</p>	<ul style="list-style-type: none"> <li>▪ Open spaces and green networks in the Borough should continue to be protected and enhanced.</li> <li>▪ The quality and continued maintenance of parks and open spaces across the Borough, the safety of their users, and maximising their use was important to respondents.</li> <li>▪ Walking and cycling should be promoted by providing links between the Borough's open spaces and built up areas.</li> <li>▪ There were mixed views on whether the new plan should classify the Borough's open spaces into public and private open space and concern that the LVRP does not fall into either definition.</li> <li>▪ Most respondents preferred an active management approach to be taken in dealing with surplus open space, including playing pitches, to ensure that they meet deficiencies in other types of open space before other uses are considered.</li> <li>▪ Standards used to define areas of deficiency per 1000 population need clarification. There were mixed views on whether benchmark standards should be applied for the provision of</li> </ul>	<p><i>CP20: Parks, Playing Fields and Other Open Spaces; Green Links; and Waterways</i> States that Council will continue to protect and enhance Enfield's network of open spaces and green links. The Proposals Map identifies public and private open spaces.</p> <p>CP31 promotes walking and cycling in the Borough.</p> <p>The Council will manage any identified surplus of playing pitches by firstly addressing all types of deficiencies in the existing playing pitch stock and then meeting the deficiencies in all other types of open space before considering proposals for alternative uses.</p> <p>The Pre-Submission Report identifies open spaces where the quality and value requires improvement and suggested measures to address such needs. The Development Management DPD will set out criteria for assessing proposals for the reuse of surplus playing pitches to meet deficiencies in other types of open space across the Borough.</p> <p>Standards used to identify areas of deficiency in Enfield's Open Space Study are based on national guidance and are similar to standards adopted by the GLA.</p>

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	<p>open space in new developments, and the comment was made that they should be reviewed in light of more recent Mayoral guidance.</p>	<p>Application of GLA standards would provide similar findings identifying the same broad areas of deficiency.</p>
	<p>There was mixed support for the principle of seeking to secure improvements in open space provision through developer contributions; some preferred a more indicative approach taking into account the impact of planning obligations on the viability of development.</p>	<p>CP35 deals with planning obligations.</p>
<p><b>7.2</b> Protecting and Improving the Housing Stock</p>	<ul style="list-style-type: none"> <li>▪ The net loss of housing stock should be prevented.</li> <li>▪ The loss of family-sized housing should be prevented where there is an identified shortage but a flexible approach should be taken for redevelopment at higher densities in locations where this is appropriate.</li> <li>▪ The existing supply of low cost homes and affordable homes within existing housing stock should be maintained.</li> </ul>	<p><i>CP9: Protecting and improving the housing stock</i>                      CP9 seeks to maintain the supply of family housing to meet local need, informed by the Housing Study. Housing stock will be protected in line with the London Plan.</p> <p>CP11 deals with the issue of affordable housing.</p>
	<p>More should be done to ensure that empty homes owned by private landlords are brought back in to occupation.</p>	<p>The Council will work with partners to seek to reduce the level of vacant homes.</p> <p>This will be done through the AAPs, policies within the Development Management DPD and grants/ assistance to landowners.</p>
<p><b>7.3</b> Managing the Supply of New Housing</p>	<ul style="list-style-type: none"> <li>▪ New housing should be supported by a sustainable level of employment and there should be no significant reduction in the capacity of the Borough to offer local jobs to residents.</li> <li>▪ The release of surplus industrial/ commercial land should be allowed.</li> </ul>	<p><i>CP10: Managing the supply of new housing and locations for new homes</i>                      CP10 states that jobs and physical and social infrastructure will be provided to support new housing, and some release of surplus employment land will be considered.</p>
	<p>Waterside residential and mixed use development should be encouraged to maximise the attractiveness of waterways and promote recreation. The provision of residential moorings should be supported.</p>	<p>Access to the waterways and LVRP will be maximized. AAPs will contain strategies to fulfill this objective.</p>
	<ul style="list-style-type: none"> <li>▪ Opportunities for large scale housing development in the ULV Area should be considered.</li> <li>▪ Housing development should be focused in town centres to place people near shops and amenities to reduce the need to travel.</li> <li>▪ New housing should be located close to public transport links. The impact of housing density on local traffic flow should be considered.</li> </ul>	<p>The plan seeks to deliver new development in the Upper Lee Valley Opportunity Area (ULVOA).</p> <p>Opportunities for housing growth in areas with higher public transport accessibility levels, such as ET and areas around the NC Road in the south west of the Borough, are set out in the Plan. New residential development will be built at densities that make the best use of land having regard to access to public transport, in line with the London Plan.</p>

Section & Topic	Summary of main issues	Outcome/ Relevant section/CP in the Preferred Options Core Strategy document
	<ul style="list-style-type: none"> <li>▪ Respondents held conflicting views on many of the issues relating to housing mix. Most respondents said that a mix of housing size and type should be provided, tailored to local circumstances.</li> <li>▪ Respondents held mixed views on whether family homes should be provided on all sites. Many considered that the blanket provision of family housing on all sites would not be appropriate as sites may not be suitable for such housing.</li> <li>▪ One house builder stated that sizes and types of housing should not be defined in policy – there should be flexibility for housebuilders to determine these based on market and commercial considerations, general planning policies and environmental considerations.</li> <li>▪ Respondents told us that there is a need for family sized homes in all tenures and that the Council should define family homes and provide for housing for all families.</li> </ul>	<p>Other housing is proposed in areas (eg Meridian Water) where access needs to be improved – see Chapter 10: Areas for Growth and Change.</p> <p><i>CP12: Housing mix</i>                      Seeks to ensure that new developments will offer a range of housing sizes and types to meet the housing needs of the local area, having regard to Enfield's forthcoming housing needs assessment.</p> <p>The Council and its partners will seek to ensure that new developments meet local housing needs and that the mix of new homes reflects the findings of regional and local Shams.</p>
<p><b>7.4</b>                      Providing Affordable Housing</p>	<ul style="list-style-type: none"> <li>▪ Most respondents agreed that the provision of affordable housing should be maximised to meet local need.</li> <li>▪ Some respondents said that affordable housing provision on sites above a certain threshold should allow for flexibility for economic viability and site specific considerations to be taken into account.</li> <li>▪ Other respondents considered it appropriate to seek a borough-wide minimum of 35% of new homes to be affordable.</li> </ul> <p>The Mayor of London advised that borough-wide affordable housing target below the London Plan's target of 50% requires justification that the target is adequate to meet affordable housing needs within the Borough. A maximum reasonable amount of affordable housing should be sought when negotiating on private residential and mixed-use schemes.</p> <ul style="list-style-type: none"> <li>▪ Support for maximising the provision of intermediate housing including housing for key workers.</li> <li>▪ The majority of respondents agreed</li> </ul>	<p><i>CP11: Affordable housing</i>                      The preferred option seeks a mix of affordable housing tenures to meet Enfield's needs, in line with the London Plan. The Council has rejected the option of achieving 35% of affordable homes on sites above an appropriate threshold in favour of seeking the maximum reasonable on-site contribution having regard to economic viability.</p> <p>The Council working with its partners will aim for 50% of overall new housing provision to be affordable. New development in appropriate schemes should make the maximum reasonable on-site contributions to this target.</p> <p>In areas where there are high concentrations of social housing the Council will seek to ensure that the proportion of intermediate homes in new developments</p>

Section & Topic	Summary of main issues	Outcome/ Relevant section/CP in the Preferred Options Core Strategy document
	<p>that the Core Strategy should set a borough-wide ratio for the balance of intermediate to social rented housing, taking into account Borough need and the London Plan.</p>	<p>helps to promote sustainable communities in the area, as reflected in CP12 (Housing Mix).</p> <p>A borough-wide ratio is set at 70% social rented and 30% intermediate, having regard to the London Plan and Enfield's forthcoming SHMA.</p>
<p><b>7.5</b>                      Providing Lifetime Homes &amp; Housing to Meet Particular Needs</p>	<ul style="list-style-type: none"> <li>▪ Adherence to the Lifetime Homes standards should be sought.</li> <li>▪ The following additional issues should be considered when identifying and assessing sites for gypsies and travellers: refuse collection, access to schools, education, health facilities and shops, and security.</li> </ul>	<p><i>CP15: Supporting People</i>                      Adherence to Lifetimes Homes standard will be sought in line with the London Plan.</p> <p>CP15 sets out a range of criteria for the location of Gypsy and Travellers sites.</p>
<p><b>8.4</b>                      Health</p>	<p>New facilities should be accessible by public transport, walking and cycling</p> <ul style="list-style-type: none"> <li>▪ Funding for additional health care facilities should be secured where proposals generate further demand on health services. The Council should also consider the cumulative impact of small developments.</li> <li>▪ Local neighbourhood needs, identified by local community organisations and other local partners should be used as a basis for negotiating local community benefit from development, including S106 agreements in Areas for Regeneration.</li> <li>▪ A working group could be set up between the Council and Enfield PCT to produce guidelines for Health Impact Assessments.</li> <li>▪ Social and economic impact assessments should be required for all significant development within the Borough and all major developments within or in areas that impact on Areas for Regeneration.</li> </ul>	<p><i>CP13: Health Care and Wider Determinants of Health</i>                      The Spatial Strategy and Core Policies seek to achieve this.</p> <p>The Council will work with Enfield PCT, NHS London and the ESP to ensure new health care facilities in line with development.</p> <p>The Development Management DPD will address Health Impact Assessments. The document will also outline the requirements of social and economic impact assessments, in line with London Plan Policy 3A.28.</p> <p>An Infrastructure Delivery Plan (IDP) also now accompanies the Pre-Submission Report.</p>
<p><b>8.5</b>                      Education</p>	<p>Development of higher and further education should be encouraged.</p>	<p><i>CP16: Children &amp; Young People</i>                      Core Policy 16 states the Council's commitment to improve the health, lives and prospects of young people and encourage the provision of public and private education facilities.</p> <p>New school facilities will be funded through Basic Needs funding from the Department for Children, Schools and Families. Additional resources will be sought through the Primary Capital Building Schools for the Future (BSF) programmes.</p>

Section & Topic	Summary of main issues	Outcome/ Relevant section/CP in the Preferred Options Core Strategy document
	<ul style="list-style-type: none"> <li>▪ Improvements in access to play areas should be supported.</li> <li>▪ Mixed views on standards for play areas and whether S106 contributions should be sought to improve play areas.</li> <li>▪ The GLA advised that open space standards should have regard to the Mayor's supplementary planning guidance (SPG) on Children and Young People's Play.</li> </ul>	<p>The Council will encourage the provision of play areas to meet projected demand across the Borough and seek improvements to child play provision.</p> <p>CP35 deals with planning obligations.</p> <p>The Development Management DPD will consider criteria for assessing planning applications for childcare facilities and standards for children's play space in new developments in line with the Mayor's SPG.</p>
	<ul style="list-style-type: none"> <li>▪ The use of facilities for outreach education/ skills advice should be supported; options for the consolidation of education facilities should be considered.</li> <li>▪ The role of the Lee Valley Regional Park as an educational resource should be considered.</li> </ul>	<p>CP16 encourages schools to use buildings for other community purposes during evenings and weekends.</p> <p>The Council will contribute to improving the health, lives and prospects of children and young people by supporting and encouraging the provision of appropriate learning facilities.</p>
<p><b>9.2</b> Balancing the Demand &amp; Supply of Land for Employment Uses</p> <p><b>9.3</b> Protecting Employment Land &amp; Improving Job Quality</p>	<ul style="list-style-type: none"> <li>▪ Particular attention should be given to areas where land is not used to its full potential, such as parts of the Lee Valley where mixed uses including housing and leisure should be encouraged close to the waterside.</li> <li>▪ Housing should not replace small businesses as loss of such employment is having a detrimental effect.</li> <li>▪ Employment policies need to take a more holistic view of the benefits of developing land for other uses. Poorly located and otherwise poorly suited land should not be the only criteria for considering release of land - other factors include the viability and likelihood that sites will be developed and the wider regeneration benefits which could be realised should be considered.</li> </ul>	<p><i>CP17: The Scale and Location of Employment Activities</i>                  States the Council's intention to ensure that sufficient land and premises are available for existing and future businesses, including safeguarding the Borough's Strategic Employment Locations (SELs) as set out in the London Plan (now SIL – Strategic Industrial Locations).</p> <p>The Council have a plan, monitor and manage approach to the release of up to 6 hectares of employment land for other uses up to 2016. Release will be concentrated in smaller industrial sites outside the SEL and Locally Significant Employment Sites (LSEs) (now LSIS – Locally Significant Industrial Sites) framework, and as part of structured consolidation and intensification in Central Leaside (CL) SEL.</p> <p>The Council will plan for the managed release of unproductive or inefficient sites to meet the objectives of the London Plan for the ULVOA for new housing, infrastructure, and other appropriate uses. At the same time it will set out economic, land use and demand based criteria for the assessment, management and release of LSES and other smaller industrial sites for other uses, principally housing, where it can be demonstrated they no longer meet the needs of modern industry and business.</p>
	<p>General support for the extension of the Freezywater SEL to include part of Innova Park provided it accords with criteria in the London Plan, is considered as part of a wider place shaping strategy and is subject to further assessment on the likely impact</p>	<p>The Plan extends the Freezywater SEL Industrial Business Park to include part of Innova Park. The North East Enfield (NEE) AAP will consider in more detail the designation of part of Innova Park as an SEL.</p>

Section & Topic	Summary of main issues	Outcome/ Relevant section/CP in the Preferred Options Core Strategy document
	<p>on the road network and identification of measures to mitigate against any impact.</p>	<p>The option not to designate part of Innova Park as an SEL was rejected in light of the recommendation of the Enfield Employment Land Study and responses to consultation.</p>
	<p>Mixed views on whether the best employment areas outside SEL needed to be defined in the new Plan and that flexibility to respond to changing market conditions is important, subject to proper assessment.</p>	<p>The Council identifies LSEs outside SELs to safeguard them for employment uses where they meet the needs of modern industry and business.</p> <p>The proposed boundaries of SELs and LSEs reflect the recommendations of the Enfield Employment Land Study.</p> <p>The option not to protect the best employment land lying outside SELs was rejected as contrary to London Plan policy.</p>
	<p>New developments must be in accessible areas with good public transport to link jobs with residential areas and deprived communities, and should only be allowed after careful scrutiny of local circumstances.</p>	<p>The Spatial Strategy and CPs reflect the need for good levels of connectivity and provision for public transport to support new development.</p>
	<p>Mixed views on whether release of employment land for other uses and more intensive development should be promoted as a borough-wide policy or be encouraged on specific sites after carefully scrutiny of local circumstances.</p> <p>Given the significant need for new homes a Borough level approach is needed.</p>	<p>The option to promote the release of employment land as a borough-wide policy was rejected in favour of a more focused approach.</p>
<p><b>9.4</b>                  Developing the Skills and Employment Opportunities of Local People</p>	<ul style="list-style-type: none"> <li>▪ Coordinating the regeneration strategies of the Council and its partners and developing a skills strategy, learning from success elsewhere, promoting new industries and encouraging employment opportunities in the leisure, cultural and horticultural and service industries.</li> <li>▪ Providing an environment for start up businesses to mature into small and medium enterprises, providing a package of help to new businesses, including new premises, access to finance, staff recruitment, training, access to markets.</li> <li>▪ Taking a flexible approach to the definition of uses suitable for employment areas, including sui generis uses such as warehouse clubs, cash and carry businesses, and builders merchants.</li> </ul> <p>Support for a mix of new employment uses in the Borough such as consultancies, start up businesses, high tech innovation such as software</p>	<p><i>CP18: Promoting Economic Prosperity and Developing the Skills and Employment Opportunities of Local People</i>                  CP18 stresses that the Council will work with partners to develop skills and employment opportunities and promote the diversification of the Borough's economy. Extending and consolidating the Borough's economic base, increasing the number of new businesses setting up, tackling worklessness and improving the skills base of Enfield's residents are key objectives of the Community Strategy, reflected in the Plan.</p> <p>CP18 aims to ensure that a mix of employment facilities and types is provided as part of appropriate new developments, including the provision of facilities suitable for the development of small and medium sized enterprises.</p> <p>CP18 promotes diversification of the Borough's economy and supporting new and expanding employment sectors.</p>

Section & Topic	Summary of main issues	Outcome/ Relevant section/CP in the Preferred Options Core Strategy document
	development and high tech manufacturing, offices, research and development, and creative industries.	
	Mixed views on whether warehousing and logistics operations should be permitted throughout the employment areas or only in areas with the best road access. Comments were made that each proposal should be treated on its own merits, on a holistic basis with access to sustainable transport in addition to access to the strategic road network.	<p>CP18 focuses storage, distribution and logistics in areas of good access to the strategic road network and where the use of rail and water based transport can be maximized.</p> <p>The option to encourage logistics across the Borough was rejected in favour of a focused approach in light of the recommendation of the SA.</p>
10 Transport	North-south and east-west traffic is funneled to a few roads that get heavily congested and most need improvement.	<p><i>CP33: Road Network</i>                      Identifies the Council's commitment to seek to deliver improvements in the road network to reduce congestion and improve the environment. Priority is to bring forward improvements to the NC Road between Bounds Green and Green Lanes.</p>
	<ul style="list-style-type: none"> <li>▪ The Highways Agency is concerned that improving access to the M25 could undo the benefits of other proposals - road based access to the M25 could encourage a lengthening and greater frequency of car-based journeys on an already highly congested part of the network. There are also safety concerns.</li> <li>▪ The need for road access to the M25 has been reduced following recent non-industrial developments. The creation of a new access road would harm the green belt.</li> </ul>	<p>CP33 identifies the NC Road between Green Lanes and Bounds Green and the surrounding road network as areas for further improvement. The area is a key development area and has some of the lowest public transport accessibility levels within Enfield.</p> <p>With regard to the M25 the Council has rejected the option to seek the provision of a Northern Gateway Access Road (NGAR) without the implementation of a package of measures to support sustainable modes of transport and protection of local residential areas, see CP30 (Cross Cutting Infrastructure Improvements).</p>
	<ul style="list-style-type: none"> <li>▪ More emphasis should be placed on walking and cycling and the quantity and quality of footpaths and cycleways should be increased.</li> <li>▪ Most people support the promotion of cycling and walking to shopping, amenities and leisure, and employment sites; however concern was expressed that the promotion of cycling should be limited to specific areas to avoid road casualties.</li> <li>▪ BW seek improvements to the canal towpath to support walking and cycling as forms of active travel, and funding through S106 agreements. However, the shared use of towpaths can be unsuitable and whilst recreational cyclists are welcomed, BW resist the designation of towpaths as formal cycleways.</li> </ul>	<p><i>CP31: Walking and Cycling</i>                      States the Council, will work with its partners, to seek to provide safe, convenient, and accessible pedestrian and cyclist access for recreation and from residential areas to key employment sites, town centres, public transport nodes and services by:</p> <ul style="list-style-type: none"> <li>▪ promoting high quality walking routes, including the London Outer Orbital Path and the Lee Valley Walk,</li> <li>▪ improving the condition of existing footpaths, creating additional links and making streets more accessible for pedestrians</li> <li>▪ supporting improvements to National Cycle Routes</li> <li>▪ completing and promoting sections of the London Cycle Network Plus and the Borough's Leisure Routes</li> <li>▪ identifying and implementing other high quality, direct, cycling routes.</li> </ul>

Section & Topic	Summary of main issues	Outcome/ Relevant section/CP in the Preferred Options Core Strategy document
		The AAPs will also consider infrastructure improvements to promote walking and cycling.
10.2 Transport & Land Use	<ul style="list-style-type: none"> <li>▪ Support for proposals to link new development with transport capacity and general support for phasing the development of new services in line with appropriate improvements to public transport. Transport for London (TfL) advised that this is not always necessary.</li> <li>▪ TfL advised that explicit reference should be made to the London Plan, the North London Sub Regional Development Framework (NLSRDF) and the Mayor's Transport Strategy, and that more information should be provided on how congestion can be reduced and public transport can be better utilised.</li> <li>▪ The Highways Agency (HA) advised that, in line with PPG13, it was necessary to identify and implement alternative sustainable options such as demand and traffic management before providing new infrastructure. Travel demand measures were also advocated by TfL.</li> </ul>	<p><i>CP28: Location and Phasing of New Development</i>                  Public transport, walking and cycling accessibility levels, the existing and potential capacity of public transport, and the need to ensure that new development does not increase local traffic congestion have been considered in the preparation of the Spatial Strategy and CP28.</p>
	<ul style="list-style-type: none"> <li>▪ The HA advised that the controlled release of development was required to ensure that a transport imbalance does not occur during the course of development.</li> <li>▪ The HA suggests that Transport Assessments and Travel Plans should be required, to ensure that developers manage growth in traffic demand and mitigate impact.</li> <li>▪ Opportunities should be considered for improving accessibility to the ULV so that development potential can be realised.</li> <li>▪ Transport and spatial planning should aim to achieve improvements in local air quality.</li> <li>▪ The provision of local employment will reduce car travel.</li> </ul>	<p>Major new developments, particularly in the ULV, will be phased in line with the provision, within the locality, of new social and physical infrastructure, improvements to public transport and complementary employment. Mixed use development will be encouraged in appropriate locations.</p> <p>The issue of air quality is addressed by the preferred option for CP5 (Air, Water, Noise and Light Pollution and Contaminated Land).</p> <p>The Development Management DPD will consider requirements for applications for new development to be accompanied by Transport Assessments and Travel Plans.</p>
	<ul style="list-style-type: none"> <li>▪ Support for seeking contributions to improve transport infrastructure, including provision for walking and cycling, where development is located away from key services and good public transport provision.</li> <li>▪ It was also suggested by several respondents that a framework for pooling contributions should be established.</li> </ul>	CP35 deals with planning obligations.
	<ul style="list-style-type: none"> <li>▪ Consideration needs to be given to improving services to existing development as well as new</li> </ul>	<p><i>CP30: Cross Cutting Infrastructure Improvements</i>                  States that the Council, working with</p>

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	<p>development.</p> <ul style="list-style-type: none"> <li>▪ The Council should work with TfL and developers to plan for and contribute towards sustainable public transport and highway improvements.</li> <li>▪ Opportunities should be considered for improving accessibility to the ULV.</li> </ul>	<p>partners, will seek to plan and deliver sustainable public transport and highway improvements to meet the needs of existing and future residents and business.</p> <p>The Council will prioritise transport infrastructure improvements in NEE and CL . CP32 (Public Transport) states the Council's commitment to support proposals for the West Anglian Route Modernisation Enhancement.</p>
<p><b>10</b>                      Transport  <b>10.3</b>                      Parking</p>	<p>There were conflicting views on parking provision. TfL and the HA advised that maximum parking standards should be applied in accordance with the London Plan – standards reflecting the relationship between public transport accessibility and density should be implemented and consideration given to car free development, travel plans and car clubs. This was supported by some respondents.</p> <p>However others had concerns about minimum parking standards and commented:</p> <ul style="list-style-type: none"> <li>▪ More underground and high-rise parking should be provided to cope with increased car use.</li> <li>▪ All new residential dwellings should have off street parking for two cars and off street parking provision should also be provided for homes in multiple occupancy.</li> <li>▪ A balance between encouraging new investment in town centres and parking provision for retail uses is required. Additional parking should be considered for retail and leisure developments in town centres or edge of centres where parking facilities would serve the town centre as a whole.</li> <li>▪ The use of front gardens for parking is an efficient use of land and ensures that front of properties are neat and tidy.</li> </ul>	<p><i>CP29: Promoting Sustainable Transport Choices and Improving Access for People with Restricted Mobility</i></p> <p>States that sustainable transport choices, walking and cycling will be encouraged, and better accessibility provided for people with disabilities. The Council will:</p> <ul style="list-style-type: none"> <li>▪ Encourage car clubs and car share schemes.</li> <li>▪ Apply maximum parking standards, where appropriate in general accordance with national and regional guidance.</li> <li>▪ Encourage reduced parking provision in locations where appropriate, having regard to the impact on the street scene of increased on street parking.</li> </ul> <p>The Development Management DPD will set out standards of car parking spaces.</p> <p>The Enfield Design Guide will address the issue of the use of front gardens for car parking as does The Town and Country Planning (General Permitted Development) Order 1995 (as amended).</p> <p>Council rejected the option to seek minimum parking standards.</p>
<p><b>10.4</b>                      Freight</p>	<p>BW advises that in some circumstances there is a sound case for considering freight by water as a viable alternative to road transport - construction waste and domestic and commercial waste from waterside development could be transported by the canal to waste transfer stations such as the London Waste Centre at Edmonton.</p>	<p><i>CP34: Freight</i></p> <p>The Council, working with its partners, will seek to promote the sustainable road, rail and water-borne movement of freight through the provision of new infrastructure and by managing the location of new storage, distribution and logistic developments.</p>

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<p><b>10.5</b> Public transport</p>	<p>General support for the need to secure better public transport.</p>	<p><i>CP32: Public Transport</i> CP32 states that the Council will work with partners to seek and secure improvements to public transport within the Borough.</p>
	<p>Improvements to railway services are required and the barrier caused by the West Anglian route on the eastern side of the Borough which causes problems to other modes of transport, particularly bus services, needs to be addressed.</p>	<p>The Council will work with partners to address conflicts between different modes of transport and in particular addressing the barrier to east-west movement caused by the West Anglian railway line in the east of the Borough. This issue will be further addressed in the AAPs.</p>
	<p>Angel Road station is isolated and not user friendly - the station should be a major transport hub and properly integrated with the NC Road and major bus services. There is potential to use the station to access local industrial estates and retail areas.</p>	<p>The Council will work with partners to improve access to and safety at railway stations. This issue will be further addressed in the CL AAP.</p>
	<p>Improvements to some bus routes are required.</p>	<p>The Council will work with partners to enhance bus routes and improving services and facilities, as appropriate and support the provision of new bus routes, particularly in the ULV and other areas with low accessibility levels.</p> <p>The Council will continue to work with the London Bus Priority Network Partnership to implement bus priority schemes and will seek to deliver the specific priorities identified in the Local Implementation Plan (LIP).</p>
<p><b>11.1</b> Upper Lee Valley</p>	<ul style="list-style-type: none"> <li>▪ General support for the North London Strategic Alliance (NLSA) draft vision provided that development and transport infrastructure do not adversely affect the environment of the ULV, its local heritage and the regional park.</li> <li>▪ Respondents highlighted the need for improved public transport accessibility and the importance of more sustainable transport modes, particularly to provide links to the Olympic Park and the Thames Gateway.</li> <li>▪ More specific comments suggested the need to encourage mixed use developments in the Ponders End area and for a more efficient mixed use of land around Wharf Road.</li> <li>▪ Some expressed concern that any new development should not encroach on the River Lee and that safety issues need to be addressed before increasing access to the reservoirs is considered. Some also felt it was important to protect the green belt in this area, whilst others were concerned that any development must not compromise</li> </ul>	<p><i>10.2 Upper Lee Valley: Central Leaside and North East Enfield</i></p> <p>The CPs for CL and NEE emphasise the Council's desire to improve accessibility, to improve existing communities and create a high quality environment, particularly in terms of living and working.</p> <p>CL is intended to be an exemplar eco community that respects its environmental constraints and maximises opportunities for new communities and waterside living, while in NEE the Council intends to explore the opportunities for waterside development and the benefits for leisure and recreation close to the regional park.</p> <p>For both areas, alternative locally specific options for the appropriate scale and nature of change will need to be considered as part of AAP preparation.</p>

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	<p>the role of the reservoirs as a water supply for London or their status as Sites of Special Scientific Interest (SSSI).</p>	
<p><b>11.2</b> North Circular Road</p>	<p>Community workshops have been held, seeking views on the key issues for the area, including the potential to promote sustainable communities, enhance the local centres, improve access to jobs, local connections and general environmental quality. Comments in relation to the Core Strategy and the AAP consultations are summarised below (because they both informed the preparation of the preferred option):</p> <ul style="list-style-type: none"> <li>▪ The EA highlighted the opportunity presented by redevelopment along the NC Road and on the opportunity sites put forward to reduce flood risk.</li> <li>▪ The Greater London Authority (GLA) requested that the AAP place specific emphasis on the quality and design of new housing, requiring developers to present effective solutions for noise and air pollution, maximising daylight and reducing the risk of flooding.</li> <li>▪ Some local residents expressed concern about demolition of existing housing along the NC for redevelopment at high densities.</li> <li>▪ Many local residents supported the retention of important historic and listed buildings in the area and the improvement of community facilities.</li> <li>▪ The London Borough (LB) of Haringey emphasised the need to ensure adequate social and community infrastructure to support any new housing and the need to consider the impact on existing infrastructure in Haringey.</li> <li>▪ The London Development Agency (LDA) suggested further investment in the industrial areas around New Southgate in order to attract new industrial uses in a higher quality industrial environment.</li> <li>▪ The New Southgate Millenium Green Trust and the Southgate Civic District Trust supported the renewal of the Ladderswood Estate, embracing existing residents as well as new, with Millennium Green as a focus for new development.</li> </ul>	<p><i>10.4: The North Circular Area</i></p> <p>The Council's preferred strategy for the area around the NC Road is to create a calm, clean and safe area to live, work and play.</p> <p>Elements will include incorporating an accessible network of green spaces, attractive and safe pedestrian environments, rejuvenated and new residential neighbourhoods well supported by social infrastructure and community facilities, and vibrant retail areas, providing strong support for a strong and active community.</p> <p>Council wants to plan for further improvements to the road beyond those currently planned through TfLs Safety and Environmental Scheme.</p> <p>Within the context of this area strategy, the locally specific options for delivering this vision will be considered in preparing the AAP.</p>
<p><b>13</b> Residential Character, Urban Design &amp; the Public Realm</p>	<p>Good design for new developments should be promoted borough-wide and would contribute to improving the quality of life for residents.</p>	<p><i>CP 22: Strategic Townscape and Landscape Character</i></p> <p>States the Council will safeguard and enhance the Borough's strategic landscape and townscape character, including seeking to ensure that all development is of the</p>

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	<ul style="list-style-type: none"> <li>▪ There are mixed views on dealing with the trend for intensification of uses in residential areas. Responses varied, from advocating the need to control such intensification through criteria for design, height and impact on local character, to support for further intensification to meet housing need.</li> <li>▪ Well designed and appropriately located tall buildings can add to the variety of the built environment. A design led approach that respects local character and considers proposals for tall buildings on a case by case basis is preferred.</li> </ul> <p>A greater use of trees, shrubs and soft landscaping and the removal of street clutter will improve the public realm and give character to an area. A unified approach is needed to coordinate improvements to the public realm. The Boroughs' trees should be protected and replaced when lost.</p>	<p>highest quality of design.</p> <p>CP22 seeks to ensure that new development respects local distinctiveness. The option supports proposals for tall buildings and other landmarks where they respect and complement local character. Guidance on design, height, etc will be provided in the Enfield Design Guide.</p> <p>The Council will encourage coordination of the activities of statutory undertakers and other agencies whose functions affect the public realm and protect the Borough's trees and soft landscaping and seek new opportunities for new and replacement planting. Further guidance on soft landscaping will be provided in the Enfield Design Guide.</p>
<p><b>13.2</b> Urban Design</p>	<ul style="list-style-type: none"> <li>▪ The multiple use of community buildings should be encouraged where uses are compatible, in order to make the best use of land, minimise the need to travel and encourage cooperation between services.</li> <li>▪ Community facilities should include police facilities to encompass the wider range of facilities within the police estate such as police shops and office accommodation for safer neighbourhood teams.</li> <li>▪ Contributions should be sought towards meeting policing needs where these directly arise as a result of significant development proposals.</li> </ul> <ul style="list-style-type: none"> <li>▪ New development should incorporate "Secured by Design" principles to reduce crime and fear of crime.</li> <li>▪ Planning applications for new businesses should also include measures to design out crime.</li> <li>▪ In designing out crime for waterside sites, reference should be made to "Under Lock and Quay- Reducing Criminal Opportunity by Design".</li> </ul>	<p><i>CP14: Safer and Stronger Communities</i>                      The Development Management DPD will consider policies to support existing and new community safety facilities and policies for the multiple use of community facilities.</p> <p>CP35 deals with planning obligations.</p> <p>The Enfield Design Guide will set out guidance on designing out crime and be informed by current best practice.</p>
<p><b>14</b> Conservation</p>	<ul style="list-style-type: none"> <li>▪ There is strong support for the inclusion of policies relating to heritage issues across the Borough, including archaeological sites,</li> </ul>	<p><i>CP23: Built Heritage</i>                      States the Council's commitment to safeguard and enhance the Borough's built heritage through a variety of measures.</p>

Section & Topic	Summary of main issues	Outcome/ Relevant section/CP in the Preferred Options Core Strategy document
	<p>historic buildings, conservation areas, historic parks and gardens, and the management of landscape and townscape to strengthen their sense of local distinctiveness and place.</p> <ul style="list-style-type: none"> <li>▪ There is some support for the designation of Areas of Distinctive Quality.</li> </ul>	
	<p>The Council should continue to maintain its local list of buildings of special architectural and historic interest and include policies to protect such buildings.</p>	<p>CP23 states that the Council will maintain a local list. In addition, respondents showed strong support for the maintenance of a list, so the option not to maintain such a list was rejected.</p>
	<ul style="list-style-type: none"> <li>▪ Conservation areas should continue to be preserved and enhanced through the retention and restoration of important features and characteristics, and in the context of the Council's recently completed Conservation Area Character Appraisals and Conservation Area Management Proposals.</li> <li>▪ The Council should also actively seek to identify and adopt new conservation areas.</li> </ul>	<p>CP23 seeks to ensure that the character and appearance of the Borough's conservation areas are preserved and enhanced, and take into account the Council's Conservation Area Management Proposals Document when considering proposals for development within them.</p> <p>The Policy also states Council will also designate further conservation areas as, when and if appropriate.</p>
	<p>The role of the historic environment to aid in the regeneration of the Borough should be promoted. There is support for further heritage-based economic regeneration projects.</p>	<p>Heritage-based economic regeneration will be maximised, particularly in growth areas. Options will be considered through the AAP process.</p>
<p><b>15</b> Enfield Town</p>	<ul style="list-style-type: none"> <li>▪ General support for seeking to cater for the projected demand within the Borough for retail floorspace for comparison goods and for concentrating this in ET around the station.</li> <li>▪ Further change in the town centre would need to be coordinated to ensure new developments complement and enhance its historic and environmental quality.</li> <li>▪ Support was given to the need for a balance of town centre uses including housing, commercial, cultural, entertainment, community services, open spaces, parking and both the day and evening economy.</li> </ul>	<p><i>10.3: Enfield Town</i></p> <p>The preferred option seeks to ensure ET provides high quality shopping and a range of good facilities for living and working.</p> <p>The Council seeks to maximise the opportunities for coordinated retail and mixed use development around the station. This is in response to evidence for a longer term need for more retail floorspace and improvements to public transport access and to create a high quality landmark gateway.</p> <p>Development opportunities will be considered in the context of preserving and enhancing the ET's attractive historic character.</p> <p>Options for the appropriate scale and nature of change in ET will need to be considered as part of the AAP preparation.</p>
<p><b>15.2</b> Town Centre Uses <b>15.3</b> Management of Change in</p>	<ul style="list-style-type: none"> <li>▪ Enfield needs attractive town centres with a balance of retail outlets, leisure and recreation uses to meet the needs of the community and ensure a vibrant local economy.</li> <li>▪ There is a need for a good balance</li> </ul>	<p><i>CP24: Town Centres</i></p> <p>CP24 encourages a range of facilities and uses within Local Centres consistent with their scale and function in the hierarchy, to meet peoples' day to day needs whilst preserving the predominance of retail uses</p>

Section & Topic	Summary of main issues	Outcome/ Relevant section/CP in the Preferred Options Core Strategy document
Town Centres	<p>of uses in town centres, including retail, non retail, housing, parking, open spaces, arts and cultural activities, and community services, all of which consider the evening economy.</p> <ul style="list-style-type: none"> <li>▪ Over concentration of certain uses in particular town centres should be avoided to ensure all sections of the community are fully served by all centres.</li> <li>▪ Restricting non retail uses in core shopping areas is supported.</li> </ul>	<p>within the centre; the level of non retail uses which will be permitted will be specified in the Development Management DPD.</p> <p>CP26 deals with leisure and culture, including the night time economy.</p> <p>Retail uses will be protected as the main function within ET and the primary shopping areas in the District Centres of Edmonton Green, Palmers Green, Southgate and Angel Edmonton.</p>
	<ul style="list-style-type: none"> <li>▪ Strengthening the role of major town centres should not be to the detriment of local shopping parades, nor lead to increased traffic congestion.</li> <li>▪ ET's role as a priority location for more comparison goods floorspace is supported to enhance its role as a major town centre.</li> <li>▪ Cockfosters, Oakwood, Winchmore Hill, Ponders End, Enfield Highway and Enfield Wash should be added to the list of district centres.</li> <li>▪ Increased floorspace for convenience goods within existing centres should be encouraged, to support the centres' vitality and viability.</li> </ul>	<p>The Council will focus proposals for large scale retail and leisure development within a catchment area covering a large part of the Borough in the major town centre, ET. Given the high PTAL ratings at Enfield Town, it is considered a sustainable location for development with readily available sustainable modes of transport which contribute to the mitigation of traffic impact.</p> <p>A range of facilities and uses within local centres will be encouraged. The Town Centre Study will indicate the demand for additional convenience floorspace.</p> <p>Cockfosters, Oakwood, Winchmore Hill, Ponders End, Enfield Highway and Enfield Wash are not designated as district centres due to their size, function and role, having regard to the London Plan and Town Centre Study.</p>
	<ul style="list-style-type: none"> <li>▪ Some town centres require modernisation and diversification to be able to compete against out of town centres and ever increasing superstores; joint initiatives between regeneration agencies are needed to support independent retailers and improve the skills of the local workforce.</li> <li>▪ Town centres should be treated in an integrated rather than a piecemeal way; proposals for change should be based on a high quality design led response to the existing character and underpinned by an understanding of each centre's historic evolution.</li> <li>▪ Policies should allow for the introduction of police facilities including police shops within town centres.</li> </ul>	<p>The Council will work with its partners to support town centre management initiatives which enhance the vitality and viability of centres and improve the quality of the environment within them.</p> <p>CP18 deals with promoting economic prosperity and development the skills and employment opportunities of local people.</p>
15.2.7 Retail Parks	Retail parks could accommodate some of the projected additional demand for retail floorspace goods that could not be accommodated in the town centres.	<p><i>CP25: Retail Parks</i></p> <p>The Council will consider the intensification of existing retail and leisure uses, or further such uses, in the Borough's retail parks only if development proposals cannot be accommodated within or on the edge of</p>

Section & Topic	Summary of main issues	Outcome/ Relevant section/CP in the Preferred Options Core Strategy document
		<p>established town centres. They would need to include measures to increase the overall sustainability and accessibility of the retail park in question.</p> <p>The Development Management DPD will consider Criteria for assessing the suitability of development proposals in the Borough's out of centre retail parks.</p>
<p><b>15.4</b>                      Entertainment, Leisure &amp; the Evening and Night-time Economy</p>	<ul style="list-style-type: none"> <li>▪ Existing leisure and cultural facilities must be protected and provision needs to be made for cultural uses such as live music, theatre, dance, visual and digital arts, concerts and rehearsal space, and the employment and training opportunities arising from such uses should be recognised.</li> <li>▪ Cinemas and other entertainment opportunities should be integrated into town centres not located in out of centre retail parks.</li> </ul> <p>The strategic importance of Picketts Lock as a key leisure and entertainment node with potential for further development needs to be recognised.</p> <ul style="list-style-type: none"> <li>▪ The evening and night-time economy helps to support the vitality and viability of the Borough's town centres.</li> <li>▪ Proposals for increasing evening and night-time activities would need to be coordinated with the Council's licensing policy, consider the impact on local residents, and be matched by additional police and licensing resources.</li> <li>▪ The Council could consider the use of Entertainment Management Zones to manage the impact of evening and night-time entertainment activities in town centres.</li> </ul>	<p><i>CP26: Leisure and Culture</i>                      CP26 states that the Council will seek to protect, promote and encourage the use of leisure and cultural facilities in the Borough by resisting the loss of existing leisure and cultural facilities unless it can be demonstrated that they are no longer required or will be built elsewhere.</p> <p>CP25 seeks to steer new retail and leisure uses to town centre / edge of centre locations rather than to retail parks.</p> <p>The Council will support the LVRPA and other partners in their efforts to increase the range, quality and access to leisure and amenity provision available to Enfield residents.</p> <p>This will also be addressed in the NEE AAP.</p> <p>The Council will support development proposals relating to the evening and night-time economy in the Borough's town centres which are in accordance with the Council's licensing policy, providing measures are in place to address issues such as community safety, policing, litter and the potential impact of noise and disturbance to local people.</p>
<p><b>Other</b></p>	<p>It is imperative to provide clear guidance and local priorities for s106 agreements, to optimise the contribution from new developments to provide the facilities essential for genuinely sustainable communities in Enfield.</p>	<p><i>CP35: Planning Obligations: General Policy Considerations.</i>                      CP35 lists a wide range of provisions to be considered in obligations. The appropriate and relevant provisions to be considered in individual negotiations will be evaluated and determined on a site by site basis, taking into account Enfield's LDF objectives and policies, and the policies and broad planning obligation priorities of the London Plan.</p>

### 3.0 Preferred Options consultation

- 3.1 Consultation on preferred options for the Core Strategy took place between 13 February and 26 March 2008.

#### Bodies consulted

- 3.2 In accordance with Regulation 26 of the Town and Country Planning (Local Development) (England) Regulations 2004 consultation bodies were consulted on the Core Strategy Preferred Options Report. The Core Strategy DPD bodies comprised of specific and general consultation bodies consulted under Regulation 25 of the 2004 regulations. A list of these bodies is set out in **Appendix D**.
- 3.3 The LDF consultation database was used to notify consultees of the publication of the Core Strategy Preferred Options Report. Recipients were sent a link to the website where comments could be made on the document and informed of the deadline for responses. More than 1300 individuals and organisations were notified, including specific, general and other consultation bodies, and internal officers and councillors. A list of 'other' consultees is also included at **Appendix D**.
- 3.4 The Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008, which came into force 27 June 2008 created the following additional Specific Consultation Bodies:
- Hertfordshire Police Authority
  - Essex Police Authority
  - The Coal Authority
  - The Secretary of State for Transport
- 3.5 Web links to the Preferred Options Report and supporting documents were emailed to the above bodies, (not previously included on the LDF database), on 31 July 2008. The remaining specific consultation bodies, such as the Primary Care Trust and the Metropolitan Police, had been consulted originally in February 2008.

#### How bodies were consulted

- 3.6 The preferred options document was made available online, and paper copies were available at all the Council's libraries and at the Civic Centre.
- 3.7 An email / letter was sent 8 February 2008 to DPD bodies, with a follow-up CD containing electronic copies of the document and supporting documents sent 12 February 2008.
- 3.8 A press notice was published in the Enfield Independent 13 February 2008 (copy at **Appendix E**), while on the same date a press release was sent to voluntary, community and business groups to allow the consultation to be publicised via the newsletters of these groups. Press releases were sent to:
- Enfield Community Empowerment Network
  - Enfield Lesbian, Gay, Bisexual and Transgender Network

- Enfield Racial Equality Council
  - Enfield Women's Centre
  - Over 50s Forum, and
  - Enfield Enterprise Agency.
- 3.9 Copies of the report were placed in Environment Direct at Council's Civic Centre and sent to all the Borough's libraries along with electronic copies. An exhibition was held at Edmonton Green library 23 February – 5 March 2008 and was attended by planning staff on 23 February 2008 to answer queries from the public. Similarly, a one-day exhibition attended by planning staff was held at Palace Gardens shopping centre in Enfield Town 8 March 2008, and from 10 to 19 March 2008 an exhibition was placed at Environment Direct.
- 3.10 A presentation was made at the ESP Management Group meeting on 4 February 2008 and an engagement group meeting was held 6 February 2008.
- 3.11 An ESP representatives and all TAG event was held 5 March 2008, where the Planning Policy team gave feedback on the issues and options all-TAG event held the previous year, spoke about the Preferred Options Report and were available to answer questions from attendees. An ESP partners day event was held 6 March 2008 and the report was publicised at the ESP board meeting 11 March 2008.
- 3.12 The report was publicised at a Conservation Advisory Group meeting held 6 March 2008.
- 3.13 Information was distributed to businesses through North London Chamber of Commerce (NLCC).
- 3.14 An ESP event 'Enfield Matters' was held 12 July 2008 which focussed on the Place Shaping Strategy.

#### *Strategic Growth Areas Report*

- 3.15 The Strategic Growth Areas (SGA) report was published for consultation 27 March – 8 May 2009 to further inform the Pre-Submission Report. The aim of report was to pull together and summarise the Council's work to date on the preferred approach to focus growth and regeneration in the Borough in four specific areas - Central Leaside, North East Enfield, Enfield Town and the area around the North Circular Road.

### **Summary of main issues and how they have been taken into account**

- 3.16 A total of 44 responses were received (respondents listed in **Appendix F**) from a range of local residents, voluntary and community groups, developers and government organisations during the publication period. A further 33 responses were received to the SGA report (respondents listed in **Appendix G**).
- 3.17 The tables below illustrate how the main issues raised during the consultation process have informed the **Pre-Submission Core Strategy Report**. Responses from the following documents have been included:
- Preferred Options Report
  - Strategic Growth Areas Report
  - Sustainability Appraisal

3.18 A copy of all written representations received during the publication period is included in a separate volume – **Appendices H - J**.

## Summary of Responses to the Preferred Options Report

### Chapter 1 - Introduction

Section/ Topic/ Core Policy	Summary of main issues	Outcome/ Relevant section CP in the Pre-Submission Report
Enfield's Local Development Framework	<p>This section needs to make reference to:</p> <ul style="list-style-type: none"> <li>Paragraph 1.1.3 should state that the Core Strategy, together with the other DPDs in the LDF, and the London Plan will constitute the statutory development plan for Enfield (GLA).</li> </ul>	<p>Following statement included in the Introduction of the Pre-Submission Report: 'The LDF, together with the London Plan, will comprise the development plan for the Borough and will replace the Council's Unitary Development Plan (UDP)'.</p>

### Chapter 2 - Enfield in Context

Section/ Topic/ Core Policy	Summary of main issues	Outcome/ Relevant section CP in the Pre-Submission Core Strategy document
<b>Enfield in Context</b>	Concerns raised were:	
	There is little reference to other strategic developments located outside of the borough boundaries (NLSA).	<p>Reference to Enfield's strategic location, cross boundary issues originating from other London boroughs, district authorities and county councils is included in 'Enfield in Context'.</p> <p>Further details are provided in <i>Appendix 5: Adjoining Borough's Policies and Developments</i>.</p>
	<ul style="list-style-type: none"> <li>The Core Strategy does not appear to pursue an agenda of polycentric growth for London for which the NLSA has lobbied.</li> <li>Polycentric development focused on the role of the town/urban centres would reduce the need for travel, lowering the need for car journeys (NLSA).</li> </ul>	<p>The Pre-Submission Report is considered to pursue polycentric growth with:</p> <ul style="list-style-type: none"> <li>Development to be concentrated in town centres and in the south and east of the borough in the ULV.</li> <li>Council to promote sustainable methods of transport, and a pattern of development that reduces the need to travel.</li> <li>Council to ensure high generating uses are supported by good public transport, as well as walking and cycling facilities.</li> </ul>
<b>2.1: National and Regional Policy Context</b>	Concerns raised were:	
	There is no reference to the emerging Opportunity Area Planning Framework (OAPF) for the ULV (NLSA).	Reference made to OAPF under "Upper Lee Valley Vision".
	Paragraphs 2.1.2-2.1.4 should be updated to reflect the current London Plan. The strategic precepts in paragraph 2.1.2 should be replaced with the Mayor's six objectives (GLA).	Strategic precepts replaced by the Mayor's six objectives. "The London Plan" section has been updated to reflect the current London Plan, the "New Plan for London", and related documents.
	The key requirements for Enfield should be updated to reflect all relevant policies of the London Plan, particularly Chapters 2A and 5B (GLA).	Key requirements updated to reflect relevant policies in the London Plan.

Section/ Topic/ Core Policy	Summary of main issues	Outcome/ Relevant section CP in the Pre-Submission Core Strategy document
	The Core Strategy Preferred Options are not in general conformity with the London Plan (GLA).	The Pre-Submission Report has been updated to be in general conformity with the London Plan.
2.2: Local Policy Context	There was general support for the principles in this section. Particular support was expressed concerning: <ul style="list-style-type: none"> <li>▪ Upgrading the status of the Development Management Document from an SPD to a DPD (HA).</li> </ul>	
	Concerns raised were:	
	2.2.17: This lack of clarity on the status of the proposed 'Development Management Document' currently results in a confused approach to general conformity throughout the Core Strategy Preferred Options. The status of this document should be determined as a matter of urgency (GLA).	The Development Management Document will be a DPD and is consistently referred to as such throughout the Pre-Submission Report.
	2.2.21: Reference is made to the "new Planning Act". Should provide dates to ensure that we all know which Act this refers to (NLSA).	This paragraph has been removed. Reference is made to the "Planning and Compulsory Purchase Act 2004" in the Introduction of the Pre-Submission Report.
	This section needs to make reference to:	
	2.2.2: should include the aim of 'Promoting Positive Futures' (Enfield's Children and Young People's Plan) and some specific commitments from the Plan about improving the quality of education transferred into the LDF Core Strategy (LSC).	Following bullet point added under children and young people (section 2.12 of Pre-Submission Report): "Provide children and young people with access to high quality education".
	2.2.5: should include a bullet: 'Promote skills, employment and enterprise as drivers of regeneration and wealth creation' (LSC).	Following bullet point added under (section 2.15 of Pre-Submission Report): "Improving the quality of life through: employment and enterprise...": "Extend and consolidate the local economic base by maximising the economic development potential of the Upper Lee Valley and town centres".
	2.2.5: should have an overarching objective to enhance the business / enterprise base within the borough (Enterprise Enfield).	
	2.2.8: Could include reference to the following draft strategies: <ul style="list-style-type: none"> <li>▪ Enfield Skills and Employment Strategy;</li> <li>▪ Strategy for Change: building schools for the future in Enfield (LSC)</li> </ul>	The Enfield Skills and Employment Strategy is referred to in <i>Appendix 4: Evidence Base</i> under the heading "Other Council Plans and Strategies".  BSF are already referenced in the Pre-Submission Report.
2.3: Spatial Portrait	Concerns raised were:	
	2.3.20: Accepts without question that Enfield's population will inevitably grow. Population growth together with inadequate housing and infrastructure	Chapter 5 of the Pre-Submission Report sets out the Council's core policies for meeting its housing objectives (including policies for new homes, affordable housing,

Section/ Topic/ Core Policy	Summary of main issues	Outcome/ Relevant section CP in the Pre-Submission Core Strategy document
	leads to problems. More thought is needed on how to tackle, and possibly avoid, the consequent pressures (Coombehurst Close RA).	housing mix and density, specialist housing and improving the existing housing stock).  These policies are supported by policies ensuring the delivery of infrastructure and services to support new and existing communities, including health, education, social exclusion and emergency services.  The Pre-Submission Report is also supported by an IDP, which provides more details of the relevant infrastructure required to enable and support the projected growth in borough.
	This section needs to make reference to:	
	2.3.9: Five main town centres should be given their designation under the London Plan (NLSA).	The Borough's town centre hierarchy is illustrated in Table 6.3, which can be found in the "Scale and Location of Retail and Office Development" section of the Pre-Submission Report.
	2.3.10: This section should set the scene with regards to flood risk, and explain that a large proportion of Enfield falls within the floodplain of the River Lee and its tributaries (EA).	Paragraph 2.73 acknowledges that: "Parts of Enfield lie within the Environment Agency's Flood Zones 2 and 3 with a medium to high probability of flooding. The management of flood risk is critical to planning for Enfield's future".
	2.3.11: Reference should be made to the role of the River Lee Navigation for passenger and freight transport by water and the use of the canal towpath for walking and cycling (BW).	<i>CP27: Freight</i> states that the Council, working with its partners, will seek to promote the efficient and sustainable movement of freight by road, rail and water.
	2.3.16: Acknowledge the significance of the River Lee Navigation as a recreation resource and should include reference to the River Lee Navigation (BW).	<i>CP35: Lee Valley Regional Park and Waterways</i> states that the council will work with its partners to: -  "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".
	Within "Problems and Challenges" [2.3.12 - 2.3.18]: <ul style="list-style-type: none"> <li>▪ No reference to the work produced by the Department of Communities and Local Government (CLG), which is then referenced in the Working Neighbourhoods Framework on the effect of social housing and its links with structural levels of worklessness.</li> </ul>	The Council is now working more closely with Enfield Homes and residential social landlords (RSLs) to address worklessness in the social housing estates in a more holistic way.  This is being delivered for the successful Future Jobs Fund Bid, the Working Neighbourhood Fund and the implementation of the Skills and Employment Strategy.
	Within "Problems and Challenges" [2.3.12 - 2.3.18]:	The following sentence has been included within the Housing and Services section of

Section/ Topic/ Core Policy	Summary of main issues	Outcome/ Relevant section CP in the Pre-Submission Core Strategy document
	<ul style="list-style-type: none"> <li>There should be reference to the effect of buy to let within the private housing sector (NLSA).</li> </ul>	the Spatial Portrait:  "Within the private sector housing market, an over concentration of buy to let properties and a growing predominance of one and two bedroom dwellings in some areas have exacerbated the trend towards a high turnover in the Borough's population."
	2.3.22: Should refer to the growth of jobs within the London central activity zone and also should make more specific reference to links with Hertfordshire and Essex in terms of job creation (NLSA).	The Core Strategy recognises that Enfield needs to exploit its location between Central London and two of the Government's Growth Areas – The London-Stansted-Cambridge-Peterborough Corridor and at the Thames Gateway as well as its role across local markets in North London.
	2.3.24: Add the following - Protect, enhance and restore rivers and their floodplains (EA).	Section 2.3.24 has been removed. <i>CP29: Flood Management Infrastructure</i> , states: "Opportunities for removal of culverts, river restoration and naturalisation should be considered as part of any development adjacent to a watercourse. Additional culverting and development of river corridors will be resisted...".
	2.3.25: Bullet point entitled 'Addressing environmental issues likely to affect Enfield' should also add 'reducing flood risk' (EA).	Bullet point under <i>Key Issues</i> "...addressing other environmental issues likely to affect Enfield..." includes "responding to flood risk in the Upper Lee Valley".
	2.3.25 - The bullet point entitled 'Protecting, enhancing and improving access to Enfield's green and open area' should also include 'biodiversity' (EA).	Biodiversity is referenced in <i>SO2: Environmental Sustainability</i> .
	2.3.24 and 2.3.25 - Suggest that there is a need to protect and enhance the Borough's historic environment in the face of population and economic growth, and that the Borough's heritage assets and the wider historic environment need to be protected and enhanced as key borough-wide issues (EH).	The following <i>Key Issue</i> has been included: "Protecting and enhancing the borough's distinctive characteristics, historic environment and established neighbourhoods, and improving the quality and appearance of Enfield's public spaces and street scene".

### Chapter 3 - Enfield's Spatial Vision

Section/ Topic/ Core Policy	Summary of main issues	Outcome/ Relevant section/CP in the Pre-Submission Report
The Basis for the Spatial Strategy	Concerns raised were:	
	The LDF needs to take full account of increasing deprivation and the sustainability of the Borough's older housing stock (Enfield Housing Association Forum (HAF)).	The spatial portrait acknowledges the existence and pattern of deprivation in the borough, and the aims of creating sustainable communities, particularly in the south and east of the borough.  The spatial portrait acknowledges that there is an overall need to improve the Borough's housing stock; <i>SO4: New Homes</i> makes

Section/ Topic/ Core Policy	Summary of main issues	Outcome/ Relevant section/CP in the Pre-Submission Report
		reference to improving the existing housing stock and <i>CP4: Housing Quality</i> makes specific reference to housing renewal.
	Supports the broad objectives of the Spatial Strategy but are concerned that the objectives have not been substantiated by a robust and reliable evidence base. The Council should finalise its evidence base and incorporate its findings into the Core Strategy (GL Hearn).	The Council has developed its evidence base throughout the process of developing the Pre-Submission Report and has incorporated the relevant findings. Details of the evidence base are provided in Appendix 4 of the Pre-Submission Report.
	Para. 3.1.2 and Appendix 1 are unsound: Council has not undertaken a review of Green Belt boundaries to identify those sites suitable for release as it acknowledges that it is required to do so by virtue of para. 7.2.4. A strategic Landscape and Visual Impact Assessment of potential locations for release should be conducted (GL Hearn).	The Council has undertaken a strategic green belt boundary review in the north east of the Borough. A detailed green belt boundary review will be undertaken as part of the production of the Development Management DPD. This is set out in <i>CP33: Green Belt and Countryside</i> .
	More detailed studies to investigate the capacity of built-up areas to absorb future development should be carried out as an urgent priority (GL Hearn).	The housing trajectory as part of the Pre-Submission Report has been informed by the 2009 London Strategic Housing Land Availability Assessment (SHLAA), assessment of individual sites, including contacting landowners/ developers and as part of the work done towards the emerging AAPs.  Areas of development will be supported by infrastructure as detailed in the Infrastructure Delivery Plan and emerging AAPs.
	The appropriate forum for the identification of sites for development is either through the Proposals Map, Site Allocations DPD or relevant AAPs (GL Hearn / Hadley Homes).	Sites will be designated for development / regeneration / change through the Site Allocations DPD and / or relevant AAPs, and will be reflected on the Proposals Map as it is updated.
Spatial Vision and Strategic Objectives	There was general support for the principles in this section. Particular support was expressed concerning: <ul style="list-style-type: none"> <li>▪ Supports the core values underpinning the Council's Spatial Vision (LVPA).</li> <li>▪ Strategic Objectives (SO) 12 and 13 that frame the core policies on economic development and enterprise (LSC).</li> <li>▪ Agree with paragraph 3.2.5. that through the intensification of employment land some may be able to be released for alternative uses (BW).</li> </ul>	

Section/ Topic/ Core Policy	Summary of main issues	Outcome/ Relevant section/CP in the Pre-Submission Report
	Concerns raised were:	
	May wish to consider whether all SOs required, and also whether the remainder of the Core Strategy has a delivery mechanism inherent to supporting these objectives (DTZ).	The 24 SOs have been reworked into 10 SOs. These objectives give direction for the Spatial Strategy and are developed in further detail in the core policies set out in the remainder of Pre-Submission Report. The core policies are supported by information on implementation and the Pre-Submission Report is accompanied by an Infrastructure Delivery Plan.
	The preferred Spatial Vision appears to fail to recognise that specific town centres, including those such as Edmonton Green, which lie outside these priority areas, still represent significant delivery locations for many of the key strategic objectives (DTZ).	The Spatial Vision and strategic objectives explicitly recognise the development potential of the borough's town centres and the opportunities that they present for enabling and focusing change and maximising the Borough's economic potential, this now includes Edmonton Green.
	The 24 SOs should be in general conformity with all of the Mayor's six objectives. As currently written London Plan Objectives 1 and 2 are not explicitly and fully taken into account in the 24 objectives and the objectives should be amended accordingly (GLA).	The 24 SOs have been reworked into 10 Strategic Objectives, which take into account Objectives 1 and 2 of the London Plan.
	The SOs relating to Climate Change and Environmental Protection (SO 1-5) should be amended to include greater prevalence of public transport, including walking and cycling and its role in reducing the effects of climate change (GLA).	Revised SO2: <i>Environmental sustainability</i> and SO8: <i>Transportation and accessibility</i> seek to promote sustainable methods of transport and a pattern of development that reduces the need to travel.
	TfL objects to any reference to new connections to the M25 and will not fund any proposals to increase major road capacity in NEE (GLA).	References to new connections to M25 have been removed from the Pre-Submission Report.
	It should be recognised in the text of Paragraphs 3.2.10 and 11 that improvements to NC Road are to improve sustainability and road safety and includes improving conditions for cyclists, pedestrians and buses. The improvements to the operation of the A10 may need to be further developed within the Network Management Plan study if this area is to be subject to substantial increase in pressure from significant development (GLA).	CP44: <i>North Circular Area</i> , the NC AAP and master planning for the area address/ will address these issues.
	TfL does not support the reference to relying on private transport as being the main mode of transport in the short term. It should be amended to state; "...although in the short term private transport is likely to be a major mode of transport in the Borough" (GLA).	Reference to relying on private transport as being the main mode of transport in the short term removed.

Section/ Topic/ Core Policy	Summary of main issues	Outcome/ Relevant section/CP in the Pre-Submission Report
	<p>Within the 'Key Areas for Growth..' (Paragraph 3.2.12), more emphasis on public transport and measures to support sustainable travel behaviour patterns as the key driver for change and regeneration in these areas (GLA).</p>	<p>The strategic objectives have been reworked; <i>SO1: Enabling and focusing change</i> seeks to focus transformational change in the ULV, existing town centres and new neighbourhoods where physical infrastructure already exists or can be improved.  <i>SO4: New homes</i> seeks to ensure development is supported by good public transport. SOs 2 and 8 seek to promote sustainable methods of transport and a pattern of development that reduces the need to travel.</p>
	<p>3.2.2: Could conflict with PPS25 as it implies that development will be focussed on waterfronts, which are areas at highest risk of flooding; PPS25 states that areas at lowest risk of flooding should be considered first for redevelopment (EA).</p>	<p>This paragraph has been removed and the section has been reworked. The Spatial Vision acknowledges that "New Developments in the east of the borough will bring opportunities to renew and improve existing flood defences and address flood risk".</p> <p>SO2 seeks to manage and reduce flood risk, and <i>CP28: Managing Flood Risk Through Development</i> will direct development to areas of lowest flood risk in accordance with PPS25 and will expect developments that lie within potential flood risk areas to reduce flood risk individually and overall.</p>
	<p>SOs for housing (6-11) should be strengthened with a commitment to improving the sustainability of existing housing - usually refurbishment but can be redevelopment (Enfield HAF).</p>	<p>SO4 makes reference to improving the existing housing stock and <i>CP4: Housing Quality</i> makes specific reference to housing renewal.</p>
	<p>SO9: New Social Facilities fails to recognise the opportunity represented by existing facilities to provide for the needs of the existing population and new residents.</p> <p>Recognise the role of improved existing facilities (CGMS Consulting/ Fairview New Homes).</p>	<p>Revised SOs 1, 4 and 8 seek to: focus development where physical and social infrastructure already exists or can be improved; ensure that new residential development is supported by good public transport, social and utilities infrastructure; and promote a pattern of development reduces the need to travel.</p>
	<p>Support a separate SO for schools that pays reference to BSF (or cross references) (LSC).</p>	<p><i>SO5: Education, Health &amp; Wellbeing</i> does not make a specific reference to BSF programme but the text supporting <i>CP8: Education</i> (para. 5.64) states "the core policy will help to deliver additional school places including the BSF programme."</p>
	<p>Recognise the importance and employment value of the existing employment land in the ULV but Core Strategy should not protect it per se. Suggest rewording SO12 to facilitate the Borough's employment potential whilst also allowing flexibility in future development (Planning Potential for Kier Property Developments Ltd / Ponders End Trust).</p>	<p>Strategic objectives revised. See SO6: <i>Maximising economic potential</i>.</p> <p><i>CP14: Safeguarding Strategic Industrial Land</i> identifies the industrial areas that the Council will safeguard.</p> <p><i>CP15: Locally Significant Industrial Sites</i> states that locally significant employment land will be released where they are no</p>

Section/ Topic/ Core Policy	Summary of main issues	Outcome/ Relevant section/CP in the Pre-Submission Report
		longer suitable for industrial uses or have been identified through the Council's place shaping programme as opportunities to contribute to wider regeneration benefits.
	SO14 should be re-worded to clearly indicate that this policy objective relates to the green belt and public open space, and not private open space (CGMS / Fairview New Homes).	<p>SO9: <i>Natural Environment</i> of the Pre-Submission still refers to 'green belt and other open space'.</p> <p>As found in PPG17, open space is defined in the Town and Country Planning Act 1990 as land laid out as a public garden, or used for the purposes of public recreation, or land which is a disused burial ground.</p>
	Support the protection of valued green spaces, but such protection should be balanced by a need to release surplus areas of land for development (CGMS / Fairview New Homes).	<p>SO9: <i>Natural Environment</i> seeks to safeguard the Borough's green belt and other open spaces and to develop a wider network of green infrastructure in the Borough, especially in the south and east where there are identified open space deficiencies, and this is reflected in Core Policies 33 and 34 <i>Green Belt and Countryside and Parks, Playing Fields and Other Open Spaces</i>.</p> <p>Sufficient land for housing development has been identified in the Borough for the period 2010/11-2024/25. See Chapter 5: Housing and Services and the housing trajectory.</p>
	Recommend that the Plan should seek to implement a full range of sustainable transport initiatives in preference to improving access to the M25 and that the Plan should adopt land use strategies / policies and allocations which reduce the need to travel in the Borough (HA).	References to new connections to M25 have been removed. SOs revised; Transport and accessibility addressed by SO8 which seeks to "enhance traffic flow by the provision of appropriate infrastructure as well as the promotion of sustainable methods of transport and a pattern of development that reduces the need to travel".
	This section needs to make reference to:	
	The strategic objectives are supported, but suggest inclusion of the phrase 'to make the Lee Valley regional Park' more accessible to nearby communities (NLSA).	SO9: <i>Natural environment</i> has been amended to seek to improve access to green areas and waterways particularly for the communities close the Lee Valley Regional Park (see also CP35: <i>Lee Valley Regional Park and Waterways</i> ).
	<p>The strategic objectives should be expanded to include sustainable public transport, including walking and cycling.</p> <p>Suggestions include:</p> <ul style="list-style-type: none"> <li>▪ Promoting public transport, walking and cycling (including minimum cycle parking standards)</li> <li>▪ Locating major trip generating developments in locations with good public transport accessibility</li> <li>▪ Requiring transport assessments and travel plans for large scale proposals</li> <li>▪ Encouraging the use of car pooling /</li> </ul>	<p>Revised Strategic Objective 2 and 8 seek to promote sustainable methods of transport and a pattern of development that reduces the need to travel, to ensure development is accessible by all means of transport and that high generating uses are supported by good public transport, walking and cycling facilities.</p> <p>The Development Management DPD will include: requirements for applications for new development to be accompanied by Transport Assessments and Travel Plans, including minimum cycle parking standards.</p>

Section/ Topic/ Core Policy	Summary of main issues	Outcome/ Relevant section/CP in the Pre-Submission Report
	car clubs and; <ul style="list-style-type: none"> <li>▪ Mitigating the impacts of road based freight and promoting alternatives (GLA).</li> </ul>	<p><i>CP27: Freight</i> states that the Council will seek to promote the efficient and sustainable movement of freight by road, rail and water.</p>
	EA requests the following strategic objectives be added: <ul style="list-style-type: none"> <li>▪ Page 16: “To protect and restore Enfield’s flood plains”.</li> <li>▪ Page 17: “To ensure that new development is located in areas at least risk of flooding and are designed sustainably”.</li> <li>▪ Page 18: “To seek opportunities to restore rivers and their river corridors”.</li> <li>▪ Page 19: “To ensure that new development is located in areas at least risk of flooding and are designed sustainably” and</li> <li>▪ “To seek opportunities to restore rivers and their river corridors”.</li> </ul>	<p>The SOs have been restructured.</p> <ul style="list-style-type: none"> <li>▪ <i>SO2: Environmental Sustainability</i> seeks to manage and reduce flood risk;</li> <li>▪ <i>CP28: Managing Flood Risk Through Development</i> will direct development to areas of lowest flood risk in accordance with PPS25 and will expect developments that lie within potential flood risk areas to reduce flood risk individually and overall;</li> <li>▪ <i>CP29: Flood Management Infrastructure</i> states that the Council will work with partners (inc. the EA) to maintain and enhance the Borough’s existing flood defence infrastructure in the medium to long term and that the Council will support flood risk management projects.</li> </ul> <p><i>SO9: Natural Environment</i> seeks to improve access to the Borough’s waterways and <i>CP29</i> states that opportunities for the removal of culverts and river restoration should be considered as part of any development adjacent to a watercourse, and that additional culverting and development of river corridors will be resisted.</p>
	EA requests the following strategic objectives be altered: <ul style="list-style-type: none"> <li>▪ <i>SO16</i>: replace “good urban design” with “good urban and natural environmental design”.</li> <li>▪ <i>SO17</i>: replace objective with: “To safeguard established communities, the quality of the local environment and make improvements where possible”.</li> </ul>	<p>SOs reworked. <i>SO9: Natural Environment</i> seeks to protect and enhance Enfield’s natural heritage and improve access to green areas and waterways particularly for communities close to the LVRP.</p> <p><i>SO10: Built Environment</i> seeks to promote a step-change in the quality of the built environment and public realm and enhance local distinctiveness and create safer, stronger communities.</p>
	<p><i>SO12</i> needs to refer to Stansted in reference to its potential growth (NLSA).</p>	<p>SOs revised. Chapter 6 of the Pre-Submission Report recognises that Enfield’s location between Stansted airport and the 2012 Olympics in the Lower Lee Valley, presents the area with the potential for a successful economic future.</p> <p>The new section on Strategic Growth Areas (4.3) acknowledges that “The Upper Lee Valley lies within a national growth area stretching from London to Stansted, Cambridge and Peterborough and is designated by the Mayor of London as an Opportunity Area capable of accommodating substantial numbers of new homes or jobs”.</p>
	<p>Land use designation for areas in close proximity to sites of special amenity value should be reviewed to explore the</p>	<p>Development Management DPD will provide guidance for sites adjoining sensitive/ special landuses</p>

Section/ Topic/ Core Policy	Summary of main issues	Outcome/ Relevant section/CP in the Pre-Submission Report
	potential to accommodate more appropriate and sustainable uses that respond to their urban potential (BW).	
	Developments adjacent to the waterways should integrate with, maximise the opportunities and not detract from their attractiveness (BW).	The Spatial Vision states that "The Upper Lee Valley will be home to.. "new communities benefiting from waterside living". SO9: <i>Natural Environment</i> seeks to improve access to waterways and the Spatial Strategy states that coordinated redevelopment in the ULV will provide opportunities to improve access to the ULV and its waterways.
	The re-allocation of sites currently allocated for industrial uses could be redeveloped in a more sympathetic manner to animate and enhance the water environment, making it more attractive for recreation and tourism (BW).	CP38: <i>Meridian Water</i> and CP41: <i>Ponders End</i> state that the Council will seek to ensure that new developments at Meridian Water and Ponders End Waterfront maximise the opportunity to reconnect with the waterfront in these locations.
	The first sentence of paragraph 3.2.7 should include reference to the River Lee Navigation given its importance as a form of open space within the borough. Alternative wording is suggested (BW).	Revised SO9 seeks to improve access to waterways, particularly for the communities close to the Lee Valley Regional Park.
	SO21 should express a commitment to encouraging waterborne freight transport within this section (BW).	SO8 revised. It seeks to promote sustainable methods of transport, and to support existing and potential businesses in providing for freight movement. CP27 will seek to promote, where appropriate, the potential for freight movement by water.
	Request the amendment of SO18 to say the following; "To protect <u>and enhance</u> the Borough's conservation areas, listed buildings (buildings of national and local architectural or historic special interest, archaeological sites, schedule ancient monuments and historic parks and gardens; and their settings" (EH).	The Spatial Vision states that the Borough's high quality built heritage will be protected and enhanced. SO10 revised, it seeks to maximise the contribution that heritage assets and existing features make to the built environment.
The Spatial Strategy	There was general support for the principles in this section. Particular support was expressed concerning: <ul style="list-style-type: none"> <li>▪ Welcome the reference to planning for transport infrastructure, including local schemes to improve public transport, cycling and walking (GLA).</li> </ul>	
	Concerns raised were:	
	The master plan areas are in the part of the Borough which is at highest risk of flooding; in accordance with Enfield's SFRA, redevelopment of this area will have to comply with the SFRA, PPS25 and the Thames Catchment Flood	The Spatial Vision acknowledges that "New Developments in the east of the Borough will bring opportunities to renew and improve existing flood defences and address flood risk".

Section/ Topic/ Core Policy	Summary of main issues	Outcome/ Relevant section/CP in the Pre- Submission Report
	Management Plan (EA).	SO2 seeks to manage and reduce flood risk, and CP28 (Location and Phasing of New Development) will direct development to areas of lowest flood risk in accordance with PPS25 and will expect developments that lie within potential flood risk areas to reduce flood risk individually and overall.
	This section needs to make reference to:	
	The spatial strategy should make clear the importance of Edmonton Green as a town centre capable of delivering future growth and associated objectives (DTZ).	The Spatial Strategy states that "The physical, social and economic regeneration of Edmonton Green and its surrounding neighbourhoods including Angel Edmonton will continue, building on the new and improved shopping, leisure facilities and housing completed to date and improving connections to the new community at Meridian Water and the Borough's other town centres".
Preferred Option Enfield's Spatial Strategy	<p>There was general support for the principles in this section. Particular support was expressed concerning:</p> <ul style="list-style-type: none"> <li>▪ Kier Property Developments Ltd and the Ponders End Trust Support the focusing of planned growth and regeneration in the ULV.</li> <li>▪ The PCT supports the spatial strategy and as part of this will seek support from the Council for the development of its 'hub and spoke' model for primary care.</li> <li>▪ National Grid Property Holdings state that the Preferred Approach is in accordance with strategic priorities for North London as set out in the London Plan, and notably Policy 5B.1</li> </ul>	
	Concerns raised were:	
	Object to the proposal to "protect land needed for existing and future employment generating activities", note some of the major employment areas in the ULV do not make a positive contribution to local urban form and sit apart from local communities - need a mixed use approach, rather than a protective employment approach. Approach could also be in conflict with SO 23 (Planning Potential for Kier Property and the Ponders End Trust).	<p>Revised Spatial Strategy states that Enfield's valuable reservoir of strategically important industrial land in the east of the borough will be safeguarded, which is reflected by <i>CP14: Safeguarding Strategic Industrial Land</i>.</p> <p><i>CP15: Locally Significant Industrial Sites</i> states that locally significant industrial land will be released where it is no longer suitable for industrial uses or has been identified through the Council's place shaping programme (such as Meridian Water and a small part of Brimsdown), as opportunities to contribute to wider regeneration benefits.</p>
	The Ponders End Industrial Estate represents a material barrier between residential areas and the ULV. Propose a mixed use redevelopment of the Ponders End Industrial Estate which	<i>CP41: Ponders End</i> seeks to create a new mixed use community at Ponders End waterfront, including sites at the southern end of Brimsdown and Columbia wharf, helping to reconnect the Ponders End

Section/ Topic/ Core Policy	Summary of main issues	Outcome/ Relevant section/CP in the Pre-Submission Report
	would facilitate better integration of a variety of uses and improve accessibility between residential areas and the services and facilities they need to access regularly (Planning Potential).	community with its waterfront.
	Note that the three areas identified: ULV, NC Road corridor and ET, all contain heritage assets set within a wider historic environment. Seek to ensure that this Strategy recognises the value of these assets and the wider historic environment and this recognition is fed into the emerging AAPs (EH).	<p>The Spatial Strategy recognises that “much of the Borough has a high quality built, historic and natural environment which will continue to be rigorously protected and enhanced”.</p> <p>For large parts of the Borough change will be small scale and the distinctive characteristics of residential neighbourhoods will be protected. Conservation Area Character Appraisals along the Development Management DPD will guide development in such areas.</p>
	This section needs to make reference to:	
	Due recognition is urged of the recent cross-government strategy ‘Healthy Weight, Healthy Lives’ (PCT).	<p>The Pre-Submission Report (Appendix 4) references the PCT Strategy, which takes into account the mentioned strategy.</p> <p><i>Also see CP7: Health and social care facilities and the wider determinants of health.</i></p> <p>The Council and PCT have a statutory duty to prepare a Joint Strategic Needs Assessment (JSNA) of the health and social care needs of their local community. The emerging JSNA, together with Health and Adult Social Care commissioning strategies, will describe the current and future health and social care needs of local populations, as well as the responsibilities for the delivery of services to meet those needs. Findings from the JSNA will feed into the Sustainable Community Strategy and Local Area Agreement.</p>
	It should be clear within the Spatial Strategy, that the extent to which particular sites can contribute to the growth and regeneration of the ULV area will be a key factor in considering whether or not they can be released for alternative uses, as will site specific considerations (National Grid).	The revised Spatial Strategy states that growth in the ULV will be in accordance with its London Plan designation as an Area of Opportunity, and that much of the existing employment land will continue to be protected to support business and provide jobs. Para 6.23 recognises that there are sites within the ULV, which have the potential for change to support urban regeneration within and around the ULV area.
	Exceeding the London Plan housing targets through planned growth is welcomed but this approach must be comprehensively underpinned with corresponding infrastructure improvements and at densities in accordance with those specified in the London Plan. The policy should make	<p>SO4: <i>New Homes</i> states “new residential development will need to be supported by good public transport, social and utilities infrastructure and achieve the maximum intensity of use having regard to development plan policy”.</p> <p>The Pre-Submission Report is also</p>

Section/ Topic/ Core Policy	Summary of main issues	Outcome/ Relevant section/CP in the Pre-Submission Report
	clear reference to this (GLA).	supported by an IDP.
Key Diagram	Concerns raised were:	
	It is inappropriate to include Figure 3.2 Enfield Key Diagram as part of the Core Strategy. This plan is more than a key diagram and shows detailed boundaries. This element of the Core Strategy can be made sound through the deletion of Figure 3.2 Enfield Key Diagram from the Core Strategy (GL Hearn).	Key diagram retained and revised. The key diagram is required to provide a graphical representation of the key spatial concepts in the Core Strategy. It has been revised in order to make as many boundaries as possible conceptual.
	This section needs to make reference to:	
	The scale and future importance of Edmonton Green is such that its role within the Borough should be recognised on the key diagrams (DTZ).	Edmonton Green included on revised (Picture 4.2): Key Diagram.

#### Chapter 4 - Climate Change and Environmental Protection

Section/ Topic/ Core Policy	Summary of main issues	Outcome/ Relevant section CP in the Pre-Submission Core Strategy document
<b>Core Policy 1:</b> Sustainable and Efficient Use of Land	There was mixed support for this policy. Support was expressed by LVRPA, Enterprise Enfield, Natrional Grid Property Holdings and CGMS for Fairview New Homes.	
<u>The policy in this form has been deleted, but comments still addressed below in relation to the Pre-Submission Report.</u>		
	<ul style="list-style-type: none"> <li>▪ Too vaguely worded for a policy, too aspirational. Supporting text needs to spell out who will be responsible for what and how elements of Plan to be delivered (HBF).</li> <li>▪ Not sure Policy necessary – largely repetitive of national policy and the London Plan (GOL).</li> </ul>	The policy has not been retained in this form. The intent is really a large part of what the Pre-Submission Report is trying to achieve.
<b>Core Policy 2:</b> Sustainable Design and Construction; Energy; and Combined Cooling, Heat and Power	There was general support expressed for this core policy.	
	The concerns raised were: <ul style="list-style-type: none"> <li>▪ Policy largely replicates 4A.7 of the London Plan, should go further especially providing more detailed advice on matters such as the broad areas where renewable energy technologies would be appropriate (GLA).</li> <li>▪ The policy should reflect the</li> </ul>	<i>CP20: Sustainable Energy Use and Energy Infrastructure</i> refers to national and regional policy.  A Renewable Energy and Low Carbon Development Study is underway (due end 2009/ early 2010), this local evidence will inform policy and the setting of specific targets in the Core Strategy, AAPs, and the

Section/ Topic/ Core Policy	Summary of main issues	Outcome/ Relevant section CP in the Pre-Submission Core Strategy document
	<p>requirements of the London Plan climate change policies. It should use the energy hierarchy, require energy assessments and ensure developments are designed to connect to more sustainable energy supplies such as renewable and combined heat and power (GLA).</p> <ul style="list-style-type: none"> <li>▪ Policies should be evidence based and be clear on implementation (HBF).</li> <li>▪ Any policy relating to local requirements for decentralised energy supply to new development or for sustainable buildings should be set out in a DPD (HBF).</li> <li>▪ Requirements should be informed by site viability and allow for flexibility, considering other implications on developers (50% affordable housing target, s106 contributions etc) (HBF, First Plan for National Grid Property Holdings).</li> </ul>	<p>Development Management DPD.</p>
	<p>This section should make reference to:</p> <ul style="list-style-type: none"> <li>▪ Reducing the consumption of energy (EA).</li> <li>▪ Making energy from waste.</li> <li>▪ Implementing policy pro-actively through the promotion of "exemplar" developments (Enfield Housing Association Forum).</li> </ul>	<p><i>CP20: Sustainable Energy Use and Energy Infrastructure</i> takes into account the need to minimise energy use.</p> <p>The local potential and opportunities for renewable or low carbon energy (including energy from waste) will be considered as part of the Renewable Energy and Low Carbon Development Study. The scale and proximity of development, the mix of uses proposed and the prevalence of existing development in the AAP areas mean that there is scope for greater use of sustainable energy use measures, particularly the use of renewable or low carbon energy.</p>
<p><b>Core Policy 3:</b> Flooding</p>	<p>There was general support for the principles in this policy (LVRPA, TW and other). Particularly support was expressed concerning:</p> <ul style="list-style-type: none"> <li>▪ Buffer zones (EA and LVRPA).</li> <li>▪ SUDS and rainwater harvesting. identifying locations for new/restoring natural floodplains, use of open spaces in floodplains for the attenuation of flood water and naturalising rivers (LVRPA).</li> <li>▪ Intention to include supplementary sustainable drainage design advice in the proposed 'Enfield Design Guide' (GLA).</li> </ul>	<ul style="list-style-type: none"> <li>▪ Reference to the need for buffer zones included in <i>CP28: Managing Flood Risk Through Development</i>. However detail appropriate for the Development Management DPD.</li> <li>▪ CP28 requires SUDS in all developments and <i>CP29: Flood Management Infrastructure</i> requires consideration of opportunities for river restoration/ naturalisation and flood water storage. Details of these requirements to be included in the Development Management DPD. Rainwater harvesting is referred to in <i>CP21: Delivering Sustainable Water Supply, Drainage and Sewerage Infrastructure</i> indirectly and more generally as "promoting water conservation and efficiency measures". This is an aspect of sustainable design and construction to be dealt with in the Development Management DPD and the Enfield Design Guide.</li> </ul>

Section/ Topic/ Core Policy	Summary of main issues	Outcome/ Relevant section CP in the Pre-Submission Core Strategy document
	Concerns raised were:	
	Duplication of PPS25 and the London Plan. Largely a development control policy (GOL).	CP28 and 29 reworded accordingly, however some reference is still needed in order for policies to make sense.
	A development management policy requiring buffer zones along the River Lee Navigation precludes efficient use of this land and other potential benefits. Maintenance is BW's responsibility and can be carried out from the water (BW).	Details of buffer policy to be included in Development Management DPD. Requirement to "normally" set back development inserted into CP28 to highlight that there may be circumstances where this is not desirable.
	More restrictive than PPS25 (Fairview).	Policy comprehensively re-written as CP28 and 29.
	Needs to be PPS25 compliant, include key SFRA policy and cross-refer to the key goals of the Thames Catchment Flood Management Plan (TCFMP) (EA & GLA).	CP28 and 29 are PPS25 compliant as evidenced by the supporting Sequential Test of the Core Strategy. SFRA outputs and TCFMP goals included where these are strategic in nature. Other outputs and goals will be included in other LDDs as appropriate. A level 2 SFRA is currently being undertaken for growth areas situated in areas at risk of flooding.
	Weak/needs more detail. Strengthen using implementation section (EA and others).	Policies CP28 and 29 much more detailed and an implementation section added.
	Refer to Lower Lea Flood Risk Management Strategy (EA).	LLFRMS is referred to, but this is still only in draft form.
	Needs to refer to the need to use the sequential test to locate development.	This repeats PPS25 and is not explicitly included.
	Does not reflect the requirements of the London Plan policies 4A.12, 4A.13, 4A.14 and 4A.15 where relevant (GLA).	<p>CP28 and 29 reviewed to reflect these policies. Existing flood defences are protected in CP29, set backs and resilient design are supported in CP28. Details to be given in the Development Management DPD and the Enfield Design Guide.</p> <p>Emergency planning is supported in CP10. River restoration and the creation of storage areas is supported in CP29. Drainage issues are covered in detail in London Plan policy 4A.14 and are therefore not repeated apart from a commitment to SUDS in CP28.</p> <p>Similarly, groundwater issues are covered in London Plan policy 4A.15 and this is not a strategic issue for Enfield. Guidance may be given in the Development Management DPD and the Enfield Design Guide.</p>
	<p>The following inaccuracies were highlighted:</p> <ul style="list-style-type: none"> <li>▪ 4.3.3: PS25 does not state 'not harmful impacts', but talks about using a sequential approach to site allocation in accordance with Table D3.</li> </ul>	Policy substantially re-written. Inaccuracies removed (relevant to both bullets)

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	<ul style="list-style-type: none"> <li>▪ 4.3.6: First sentence- the Level 1 SFRA is complete. Replace 'abatement' with 'mitigation'. Replace 'precautionary' with 'risk based' approach (EA).</li> </ul>	
	This section needs to make reference to:	
	Mention that areas of Montagu Road and the Eely estate which were flooded significantly in recent years (EA).	Reference made to these flooding incidents in the opening text preceding CP28.
	Other sources of flooding (EA, TW).	Other sources of flooding are discussed in CP28.
	The need to safeguard sufficient space for the Salmons Brook flood alleviation scheme (EA).	The Salmons Brook flood alleviation scheme is explicitly supported in CP29. However, proposals are not yet final and therefore land allocations cannot be made. A commitment to the delivery of all flood risk management projects is made, including through safeguarding land (CP29).
	Flood resilience and resistance measures in both existing and new developments (EA).	Resilience and resistance measures are referred to in CP28. However, details are more appropriate for the Development Management DPD and the Enfield Design Guide.
	<ul style="list-style-type: none"> <li>▪ Support for an innovative approach to design in areas of flood risk to maximise housing and infrastructure provision in areas that will otherwise remain under-utilised.</li> <li>▪ Alternatives in case allocated sites prove too prone to flood risk. How ensure housing delivery and assess risk? (HBF)</li> </ul>	Alternatives not provided as there are no other opportunities for large scale growth in the Borough. However, there is growing certainty in the allocated sites' ability to accommodate development (following Sequential Test of Core Strategy and when considering existing defences).
	Essential utility infrastructure may need to be located within areas of high flood risk (TW).	CP28 and 29 are flexible enough to allow essential infrastructure in areas of flood risk.
<b>Core Policy 4:</b> Managing Heat Island Effects and Pressures on Water Resources	There was general support for the principles in this policy.	
	Concerns raised were:	
	Whilst this policy is supported it could be strengthened by making reference to grey water and proactive design intervention in new development.	<i>CP21: Delivering Sustainable Water Supply, Drainage and Sewerage Infrastructure</i> has been amended to better reflect these issues; further detail will be provided regarding design intervention and grey water management in the Enfield Design Guide and Development Management DPD.
	It is unreasonable to argue that there are no alternatives to this policy. Need to consider how the measures the	Council agrees that the necessary infrastructure will need to be in place to accommodate the development being

Section/ Topic/ Core Policy	Summary of main issues	Outcome/ Relevant section CP in the Pre-Submission Core Strategy document
	Council proposes will impact upon site viability and the housing trajectory. It would be more appropriate to develop areas of Enfield's green belt to improve the environmental quality of residents and to counter the urban heat island effect, rather than ramping up densities in the town centres (HBF).	proposed – CP21 has been amended to reflect this and an IDP accompanies the Pre-Submission Report.  To build homes on green belt land would be contrary to the London Plan and a review of the green belt is not part of the preparation of the Pre-Submission Report.
	This is an unnecessary policy that will be difficult to measure in terms of the Annual Monitoring Report (AMR) (GOL).	Partly agree. The heat island effects element of this policy has been deleted. However, water conservation, efficiency and sustainable drainage measures incorporated into new developments will have targets identified in the Development Management DPD and can be monitored accordingly.
	Existing water supply infrastructure is unlikely to be able to support the demand from the proposed levels of development. All reasonable measures should be taken to reduce demand and should be implemented (EA).	CP21 seeks to ensure that there is a supply of water to new developments that are being proposed, and to promote water efficiency and conservation measures where possible.
	Suggest a specific policy on water use, water supply and water quality, which covers all development, and supports water efficiency measures alongside new water resources. Would also welcome a policy supporting utility infrastructure generally (Thames Water).	CP21 refers specifically to water supply, drainage and sewerage, and water efficiency measures. <i>CP46: Infrastructure Contributions</i> makes reference to water infrastructure.
<b>Core Policy 5:</b> Air, Water, Noise and Light Pollution and Contaminated Land	There was general support for the principles in this policy.	
	Concerns raised were: <ul style="list-style-type: none"> <li>▪ Generalised non-locally distinctive policy (GoL).</li> <li>▪ That a balanced approach to contaminated land is adopted in accordance with PPS23 (First Plan for National Grid Property Holdings).</li> <li>▪ Need to consider whether development will cause air quality compliance problems or make an existing forecast compliance problem worse. This should be done through the SA Process or through the Development Management DPD (HA).</li> <li>▪ The policy does not fully reflect all of the noise issues raised in London Plan Policy 4A.20. A specific policy should be included in the Core Strategy or other suitable DPD (GLA).</li> </ul>	<p><i>CP32: Pollution</i> sets out a balanced approach to contaminated land in order to secure sustainable development through the efficient reuse and recycling of brownfield land and to deal with the contamination issues.</p> <p>CP32 requires development to improve air quality by reducing pollutant emission and public exposure to pollution. The AAPs will consider how air pollution can be reduced or mitigated against at the more local level pollution.</p> <p>CP32 seeks to minimise noise pollution in line with London Plan Policy. The Development Management DPD will require impact assessments to be provided, where appropriate, in order to assess the effect of development.</p>

Section/ Topic/ Core Policy	Summary of main issues	Outcome/ Relevant section CP in the Pre-Submission Core Strategy document
	<p>It was suggested that the section should:</p> <ul style="list-style-type: none"> <li>▪ Consider the implications of the Water Framework Directive (EA).</li> <li>▪ Make reference to bio-remediation technologies (Enfield Housing Association Forum).</li> </ul>	<p>CP32 requires development to:</p> <ul style="list-style-type: none"> <li>▪ Ensure that new development does not compromise water quality.</li> <li>▪ Secure improvements to water quality where appropriate.</li> </ul> <p>The Council will work with partners to seek improvements to the water environment, and recognise that the requirements of the Water Framework Directive and the emerging Thames River Basin Management Plan are both key to delivering this objective. Once the Thames River Basin Management Plan is finalised, it will inform the AAPs.</p> <p><i>CP32: Pollution</i> seeks to address the risks arising from contaminated land through land remediation so that it is suitable for the proposed end use. Criteria to assess proposals will be set out in the Development Management DPD. The most appropriate remediation method will be considered on a site by site basis.</p>
<b>Core Policy 6:</b> Aggregates	<p>There was general support for the principles in this policy (Enterprise Enfield and GLA with conditions). Particularly support was expressed concerning:</p> <ul style="list-style-type: none"> <li>▪ "better use of aggregates and protection of the Lea Valley Reservoirs" (TW).</li> </ul>	<p><i>CP23: Aggregates</i> commits Council to identify sources of aggregates. However, it is not currently known if any workable sources are present.</p>
	<p>Concerns raised were:</p>	
	<p>CP6 and paragraphs 4.4.22 and 4.4.23 are not clear and appear to be inconsistent with The Lee Valley Regional Park Plan (para 2.2.10), which saw the waterways as an asset for enjoyment and leisure-related employment. Short-term extraction of aggregates that would allow the reservoirs to be expanded for the type of leisure use envisaged in the Regional Park Authority's Plan are to be supported, but permanent dredging would work against that plan. We would support a clearer commitment to the Park Authority's Plan or a more detailed explanation why an alternative is being advanced in Enfield (LSC).</p>	<p>No commitments are made in the Core Strategy due to a lack of data from Thames Water. The Strategy for the reservoirs will need to be reviewed should workable deposits be identified. It is acknowledged in CP 23 that just because a deposit is found, extraction might not be desirable.</p>
	<p>Policy simply "supports" the better use of aggregates and provides less detail than the relevant London Plan policies (4A.30 - 4A.32). Unless it is to include some locally specific detail, there is no point in including the policy (GOL).</p>	<p>Acknowledged. There is currently uncertainty surrounding aggregates, therefore reference is made to the potential for extraction in King George V reservoir, but no detail can be given. Identification of a potential location is locally specific and therefore warrants inclusion.</p>

Section/ Topic/ Core Policy	Summary of main issues	Outcome/ Relevant section CP in the Pre-Submission Core Strategy document
	As the Council has identified, the use of the King George V Reservoir for future aggregate extraction needs careful consideration and close consultation with Natural England because of potential impacts on the SSSI (NE).	Acknowledged in Policy CP23
	Objects to inclusion of King George V reservoir in the draft strategy for gravel dredging given the likely adverse impact on its SSSI designation and the Special Protection Area (LVRPA).	No decisions can be made as the data is incomplete. However, the potential for extraction must be acknowledged. The existence of other considerations, which may make extraction undesirable are explicitly acknowledged in CP23.
	In order to ensure general conformity with London Plan Policy 4A.31 the Council should revise the wording of the policy to explicitly include the specific requirements of policy 4A.31 (GLA).	Regarding London Plan policy 4A.31: Council do not yet have sufficient information to identify and safeguard aggregate resources. The Core Strategy is not the appropriate place to set detailed standards. Many of the freight-related requirements of this policy are included in <i>CP27: Freight</i> . The remainder of London Plan policy 4A.31 sets strategic considerations which are automatically a part of our development plan and therefore do not warrant repetition.
	This section needs to make reference to: <ul style="list-style-type: none"> <li>▪ This section could include a proposal to encourage the development of sites which produce secondary aggregates from materials such as glass (e.g. Day aggregates) (GLA).</li> </ul>	This issue will be covered in the emerging North London Waste Plan (NLWP). Such facilities will however be supported by <i>CP13: Promoting Economic Prosperity</i> .
	Level of aggregates in the Lea Valley Reservoirs is unknown (TW).	Uncertainty reflected in revised wording of CP23.
<b>Core Policy 7:</b> Delivering Sustainable Waste Management	There was general support for the principles in this policy. Particular support was expressed concerning: <ul style="list-style-type: none"> <li>▪ Not delegating matters to waste plan (GLA).</li> <li>▪ Providing over capacity (Enterprise Enfield).</li> <li>▪ Treatment of waste close to its source and promote the sustainable transport of waste (HA).</li> </ul>	<ul style="list-style-type: none"> <li>▪ There has been some review of the Policy content. Repetition of national (PPS10) and regional policy has been removed. <i>CP22: Delivering Sustainable Waste Management</i> cannot prejudge the content of the NLWP, which is currently in draft form only, and therefore some delegation is necessary.</li> <li>▪ CP22 is committed to increasing the self-sufficiency of north London. The level of provision will be determined by the NLWP.</li> <li>▪ CP22 still promotes the sustainable transport of waste. Council has little control over the origin of waste treated in the borough, however the NLWA are currently procuring sites to ensure that the municipal waste it collects is treated within the 7 boroughs that it covers.</li> </ul>
	Concerns raised were: <ul style="list-style-type: none"> <li>▪ Does not adequately reflect the London Plan policies. (GLA)</li> </ul>	The policy has been reviewed. The Council believes CP22 does now reflect London Plan policies on waste where this doesn't involve repetition, or where these matters are not necessarily dealt with as part of the

Section/ Topic/ Core Policy	Summary of main issues	Outcome/ Relevant section CP in the Pre-Submission Core Strategy document
		NLWP.
	The following inaccuracies were highlighted: <ul style="list-style-type: none"> <li>▪ Targets given in paragraph 4.5.1 are incorrect, should refer to Policy 4A.21 of the London Plan (GLA).</li> </ul>	CP22 cross refers to the London Plan to avoid repetition.
	This section needs to make reference to:	
	Emphasise opportunities for waste management due to major development and road, rail and waterway transport in the Lee Valley (HAF).	To emphasise one location in particular would prejudice the outcome of NLWP. Although some waste facilities may be desirable (eg to deal with local waste and where multiple benefits can be obtained), there may be conflicts with place shaping objectives. These potential conflicts would need to be carefully managed through AAPs and master planning work; therefore making allocations at this time is unsuitable.
	Refer to the Mayor's self-sufficiency/ recycling targets, the Mayor's hierarchy for energy from waste and the actual apportionment for Enfield (GLA).	A cross-reference is made to these targets in the introductory text, but repetition is avoided. This is not an appropriate place to discuss different technologies. This discussion will be undertaken within the NLWP. The combined apportionment of the 7 boroughs involved in the NLWP is quoted as this better reflects our joint approach to waste management (as suggested in the London Plan).
	Commercial and Industrial (C& I) waste data should be included alongside the municipal data (GLA).	Reference is made to the London Plan targets to avoid repetition. Apportionment targets are given in CP22, which includes those for C& I waste.
	Emphasise business waste (Enterprise Enfield).	Emphasis is not given as the NLWP will investigate individual waste streams in detail. However, C&I waste is included in the apportionment targets.
	Opportunities to use recycled materials in developments (GLA).	Reference is made to the desirability of using recycled materials in new developments (CP22). However, details will be given in subsequent LDDs including the Development Management DPD and Enfield Design Guide.
	It was suggested that additional policies should: <ul style="list-style-type: none"> <li>▪ Support the upgrade of sludge treatment capacity at Deephams STW (TW).</li> <li>▪ Safeguard sites that offer the opportunity of transferring waste to sustainable modes (HA).</li> </ul>	<ul style="list-style-type: none"> <li>▪ The upgrade is acknowledged in CP21</li> <li>▪ This is a matter for the NLWP.</li> </ul>
	Text should clearly set out the respective roles of, and relationship between, the Borough's Core Strategy and the NLWP (GLA).	Text added to introductory text of CP22.

Section/ Topic/ Core Policy	Summary of main issues	Outcome/ Relevant section CP in the Pre-Submission Core Strategy document
<b>Core Policy 8:</b> Making Provision for Waste	There was general support for the principles in this policy. Particular support was expressed concerning: <ul style="list-style-type: none"> <li>▪ Not delegating matters to waste plan (GLA).</li> </ul>	There has been some review of the Policy content. Repetition of national (PPS10) and regional policy has been removed. CP22 cannot prejudice the content of the NLWP which is currently in draft form only and therefore some delegation is necessary.
	Concerns raised were: <ul style="list-style-type: none"> <li>▪ Does not adequately reflect the London Plan (GLA)</li> <li>▪ Should state: "The Council will ensure the provision" (GLA).</li> </ul>	<ul style="list-style-type: none"> <li>▪ The policy has been reviewed. The Council believes CP22 does now reflect London Plan policies on waste where this doesn't involve repetition, or where these matters are not necessarily dealt with as part of the NLWP.</li> <li>▪ Council cannot ensure this provision as facilities are delivered by external partners. However, the actions given should facilitate this as far as possible.</li> </ul>
	This section needs to make reference to: <ul style="list-style-type: none"> <li>▪ Apportionment figures, broad location names, the NLWP, construction, demolition and excavation, and hazardous waste (GLA).</li> <li>▪ The policy should clearly set out criteria for the selection of sites for waste management and disposal, include proposals for construction waste and hazardous waste (GLA).</li> </ul>	<ul style="list-style-type: none"> <li>▪ Joint apportionment figures are stated in CP22.</li> <li>▪ Broad location names are not given in CP22 because the allocation of sites is dealt with in the NLWP and this would mean unnecessary repetition. Reference is made to "all types of waste", details are to be contained in the NLWP which will set policy on these issues.</li> <li>▪ This is the purpose of the NLWP, and it is not appropriate to prejudge the outcome of the preparation of this document here.</li> </ul>
	It was suggested that additional policies should: <ul style="list-style-type: none"> <li>▪ Resist the location of such facilities in the Regional Park (LVRPA).</li> <li>▪ Designate and safeguard those waste management sites identified in the Borough by the NLWP (GLA).</li> </ul>	<ul style="list-style-type: none"> <li>▪ This would prejudge the outcome of the NLWP. However, the LVRP designation has been used in the NLWP PO report to exclude consideration of potential waste sites.</li> <li>▪ Included in CP22 in principle. However, the final list of sites will be identified in the NLWP and cannot be given in the Pre-Submission Report due to continued uncertainty about existing data. The proposals map will need to be reviewed following the adoption of the NLWP.</li> </ul>

## Chapter 5 - Housing and People

Section/ Topic/ Core Policy	Summary of main issues	Outcome/ Relevant section CP in the Pre-Submission Report
<b>CP9:</b> Protecting and Improving the Housing Stock	There was general support for the policy. It was suggested that: <ul style="list-style-type: none"> <li>▪ The Council could be more proactive and lead on initiatives to reduce the level of empty homes/ improve the physical condition and energy efficiency of existing stock.</li> <li>▪ The plan should recognise that net reductions on a specific site may be necessary to meet overall objectives to improve the housing stock.</li> </ul>	<p><i>CP4 – Housing Quality: Housing Renewal.</i> Council will use its development management powers to prevent the loss of all homes, including affordable homes and will work with partners to seek to reduce the level of vacant homes, and improve the physical condition and energy efficiency of the existing housing stock.</p> <p>An Estates Investment Management Strategy will be undertaken to inform the future management of priorities for investment across the Council's own housing stock.</p>

Section/ Topic/ Core Policy	Summary of main issues	Outcome/ Relevant section CP in the Pre-Submission Report
	<p>Support the policy and advised it is in general conformity with London Plan Policy 3A.4 but in order to be in general conformity with Policy 3A.15 it should clearly make reference to the need to prevent the loss of housing, including affordable housing, without its planned replacement at existing or higher densities (GLA).</p>	<ul style="list-style-type: none"> <li>▪ Renewal schemes for Highmead and Ladderswood estates have already commenced.</li> <li>▪ It is acknowledged that in some parts of the south and east of the Borough private landlords and their inexperience in property management is contributing to a poor environment and high resident turnover. Council will work with CLG with regard to the Rugg Review which will consider options for the provision of additional powers for local authorities to have greater control over the private sector rental markets in local areas.</li> <li>▪ The Homes and Communities Agency (HCA) has agreed £54.4m of funding to upgrade and refurbish the TfL properties on the NC Road. This refurbishment will form part of Council's work within the NC AAP and master planning for New Southgate.</li> </ul>
<p><b>CP10:</b> Managing the Supply of New Housing and Locations for New Homes</p>	<p>There was general support for the policy to exceed London Plan targets and the identification of locations for new development in the ULV and town centre locations.</p>	
	<p>Concerns raised were:</p> <ul style="list-style-type: none"> <li>▪ Policy is weak and unsound as it is not yet informed by a robust and credible evidence base in the form of a SHLAA which should be informed by industry and market intelligence – therefore the policy is inconsistent with PPS3.</li> <li>▪ The housing trajectory is not based on robust evidence and fails to demonstrate a five year housing land supply for 6-10 and 11-15 years.</li> <li>▪ The trajectory lacks supporting information on the number of permissions and anticipated site yields and, evidence of deliverability.</li> <li>▪ The Council is relying on the delivery of windfall sites to meet the London Plan target.</li> <li>▪ There is over reliance on windfall sites – there is no evidence of genuine local circumstances that prevent specific sites being identified to justify windfall allowance.</li> <li>▪ London Plan target does not reflect expectation of greater housing development in the ULV detailed in the London Plan Consolidated with Changes since 2004.</li> </ul>	<p><i>CP2 – Housing Supply and Locations for New Homes</i>                      The housing trajectory is now informed by the London SHLAA (2009) and additional work including contacting land owners/ developers.</p> <p>Part of the supporting documents to the Pre-Submission Report includes <i>Enfield Housing Trajectory 2010/11 – 2024/25: Including justification of the 1-5 year deliverable supply (November 2009)</i>. This document outlines the process for identifying sites and their placement in the 15-year Core Strategy time frame.</p> <p>There is no reliance on windfall for the first five years. Windfall allowance has been included in years 6-15 but if all the sites in the AAP areas come forward, it is likely windfall won't be needed to meet the existing and proposed London Plan targets.</p> <p>Enfield's new draft housing target (<i>Draft Replacement London Plan, October 2009</i>) takes into account the large housing sites as proposed in Council's Place Shaping Priority Areas (which includes the ULV).</p>
	<p>It was suggested that the policy should:</p> <ul style="list-style-type: none"> <li>▪ Identify sites for development over a 15 year period.</li> <li>▪ Be clear about the approach for assessing appropriate densities for new residential development.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Small and large sites have been identified over the 15-year period including time frames for possible delivery of housing.</li> <li>▪ <i>CP4: Housing Quality</i> states that density will be informed by the London Plan</li> </ul>

Section/ Topic/ Core Policy	Summary of main issues	Outcome/ Relevant section CP in the Pre-Submission Report
	<ul style="list-style-type: none"> <li>▪ Make reference to public transport improvements and accessibility</li> <li>▪ Release employment land based on quantitative and qualitative assessments.</li> <li>▪ Place more emphasis on the role of town centres as a location for housing growth. Edmonton Green should be recognised as a potential growth area.</li> <li>▪ Acknowledge opportunities for housing outside the ULV Area (including windfall sites).</li> </ul>	<p>density matrix and the AAPs.</p> <ul style="list-style-type: none"> <li>▪ The section on housing generally refer to the link between locating housing where there is good public transport access or acknowledge the need for public transport improvements to facilitate new development.</li> <li>▪ The release of employment land for housing was informed by the North London Employment Land Study (Halcrow 2005), and what land has already been lost to retail, leisure and residential uses. All employment land designations were reviewed in light of relevant national PPSs and representations received throughout the LDF process. It was determined that a certain amount of land could be released for mixed uses (ie in Ponders End and CL ) without compromising the employment requirements of the Borough.</li> <li>▪ The Pre-Submission Report does place emphasis on a number of town centres for the focus of housing growth. It has been decided that Enfield Town, Ponders End, CL and the area around the NC will be the focus for housing growth over the next 15-years +. Upper Edmonton will also be focus for growth and regeneration with the area marked for master planning work.</li> <li>▪ Section 5.10 acknowledges that housing can occur outside the AAP areas.</li> </ul>
	<p>The EA advise that the policy currently conflicts with PPS25. Suggest adding to last sentence 'and having regard to flood risk'.</p>	<p>Flooding for all development types is addressed in Section 8.1 of the Pre-Submission Report.</p>
	<p>Intensification of uses near a neighbouring borough boundary should take account of the infrastructure needs of the local communities, including the neighbouring borough's communities.</p> <p>Future growth and intensification in the ULV opportunity area should be subject to a rigorous assessment to ensure the avoidance of any flood risk downstream (LB Haringey).</p>	<p>The main area of growth that could affect infrastructure within Haringey is the proposed development of CL .</p> <p>As part of the planning for this development Council has looked at the requirements with regard to, for example, public transport, education and health. Services to meet the needs of any future residents have been planned for at least the first 5 years of the plan, beyond that Council will have to monitor population growth and the development process in the preceding years to plan for the next 10+ years.</p> <p>Level 2 SFRAs are being completed for areas of intensification within the ULV, see Section 8.1.</p>
<p><b>CP11:</b> Affordable Housing</p>	<p>There was support for the intent of the policy but generally concern was raised that the 50% target was too high and the policy does not:</p> <ul style="list-style-type: none"> <li>▪ Sufficiently take on board issues of</li> </ul>	<p><i>CP3 – Affordable Housing</i></p> <ul style="list-style-type: none"> <li>▪ Council is seeking to achieve a borough-wide target of 40% affordable housing units in new developments on sites capable of accommodating 10+</li> </ul>

Section/ Topic/ Core Policy	Summary of main issues	Outcome/ Relevant section CP in the Pre-Submission Report
	<p>economic viability.</p> <ul style="list-style-type: none"> <li>▪ Offer flexibility in the proportion of affordable housing provided.</li> <li>▪ Allow for tenure types specific to geographic areas/ demographic need.</li> </ul>	<p>dwellings.</p> <ul style="list-style-type: none"> <li>▪ The target is based on the recommendations of the Enfield Affordable Housing Economic Viability Study (2009) which assesses the capacity of development in Enfield to deliver affordable housing without adversely affecting the financial viability of development.</li> <li>▪ There is flexibility with regard to providing affordable housing off-site but a target has been set based on a needs assessment and therefore flexibility of the proportion of affordable housing is not an option.</li> </ul>
	<p>It was suggested that:</p> <ul style="list-style-type: none"> <li>▪ There should be flexibility to allow for the substitute of social tenure with private tenure as well as intermediate provision in appropriate locations.</li> <li>▪ Targets for affordable homes should be rigorously pursued (Enfield HAF).</li> </ul>	<ul style="list-style-type: none"> <li>▪ There is flexibility with regard to the tenure mix based on the affordable housing in the area.</li> <li>▪ Targets will be pursued through the development process and the provisions in the Pre-Submission Report and London Plan.</li> </ul>
	<p>The GLA advised:</p> <ul style="list-style-type: none"> <li>▪ The policy currently fails to clearly define affordable housing, as required by London Plan Policy 3A.8 either in the policy or supporting text.</li> <li>▪ Furthermore, whilst the policy is broadly consistent with the requirements of London Plan policies 3A.9 and 3A.10 the wording of the policy should be restructured to make its application clear and consistent with the London Plan, thereby avoiding the potential for significant harm to the implementation of the London Plan.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Affordable housing is defined in Section 5.13 and the Glossary.</li> <li>▪ Section 5.2, including CP2 is now consistent with the suggested wording of the GLA.</li> </ul>
<b>CP12:</b> Housing Mix	<p>It was felt the policy was too broadly worded and needs input from a Housing Market Assessment (HMA) to demonstrate what mix is needed in what area.</p>	<p><i>CP5 – Housing Types</i></p> <ul style="list-style-type: none"> <li>▪ The policy is now informed by a HMA and sets out the split between market, intermediate and social rented housing to be sought across the Borough.</li> </ul>
	<p>Concerns raised included:</p> <ul style="list-style-type: none"> <li>▪ That specifying the quantum and precise housing mix would be restrictive and stifle development of housing sites.</li> <li>▪ Not all sites/ forms of development will be appropriate for family sized housing or are able to provide a range of housing sizes and types.</li> </ul>	<ul style="list-style-type: none"> <li>▪ The housing mix sought is based on a needs assessment and has been tested through discussions with stakeholders in the house building industry.</li> <li>▪ It is acknowledged that not all sites will be suitable for all types of dwellings and <i>CP4: Housing Quality</i> 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 AAPs for the Borough's</li> </ul>

Section/ Topic/ Core Policy	Summary of main issues	Outcome/ Relevant section CP in the Pre-Submission Report
		strategic growth areas and the place shaping priority areas within them, will inform the density of proposals for housing developments.
	It was suggested that: <ul style="list-style-type: none"> <li>▪ Should facilitate the development of schemes that meet housing needs rather than schemes that may generate greater financial return at the expense of local housing needs (Enfield HAF).</li> <li>▪ The policy needs to balance the need to make the best use of land and need to provide housing choice based on criteria such as site location (suitability of providing particular types of housing) and type of development.</li> </ul>	Development will still be assessed in terms of density and the surrounding character (see comment above) but now the Pre-Submission Report provides guidance to developers on the housing split sought by Council, which has been based on a needs assessment.
	Support the policy with the condition that evidence of regional needs will also be taken into account. In particular, the 2004 London Housing Requirements Study and the next publication of the London Plan Housing SPG (expected end 2008) which will reflect the 2008 London SHMA. Taking regional assessments of need is in line with London Plan Policy 3A.9, the London Plan Housing SPG and PPS3 (GLA).	Council has nearly finalised its own HMA (at November 2009), the preliminary results of which have been used to inform the Pre-Submission Report.  Council's HMA was informed by the London SHMA 2008 (April 2009) and has also fed into the sub regional HMA, of which a draft report was issued November 2009.
	The HBF advised: <ul style="list-style-type: none"> <li>▪ The Council should undertake a SHMA to complement the GLA's SHMA.</li> <li>▪ The Council cannot determine the size, type and tenure of market homes.</li> </ul>	<ul style="list-style-type: none"> <li>▪ A HMA now informs CP4.</li> <li>▪ Council will seek to ensure a range of housing types – the breakdown being supported by the HMA.</li> </ul>
<b>CP13:</b> Health care and Wider Determinants of Health	There was general support for the principles in this policy.	
	The PCT welcomes the recognition of the need to produce guidelines for Health Impact Assessments but also believes that future development of the Borough should be informed by Joint Strategic Needs Assessments (JSNA's).	<i>CP7 – Health and Social Care Facilities and the Wider Determinants of Health</i> A JSNA is currently being prepared and will establish the health and social care needs of local communities with Enfield, along with the Health & Adult Social Care commissioning strategy.
	Concerns raised and suggestions included: <ul style="list-style-type: none"> <li>▪ Policy too broad, should identify proposals for new health care facilities.</li> <li>▪ Implementation should be supported by assessment of need and contributions sought from developers for new facilities clearly set out.</li> </ul>	<ul style="list-style-type: none"> <li>▪ The policy now identifies new facilities and the phasing for their delivery, see the IDP.</li> <li>▪ Funding for new facilities will come from the PCT budget and possibly through developer contributions (s106 or the emerging CIL). More specific details cannot be provided at this stage.</li> </ul>

Section/ Topic/ Core Policy	Summary of main issues	Outcome/ Relevant section CP in the Pre-Submission Report
<b>CP14:</b> Safer and Stronger Communities	There was general support for the intent of the policy, however it was highlighted to be too broad and not specifying actual initiatives.	<i>CP9 – Supporting Community Cohesion</i> The policy now contains initiatives and links to other Council strategies aiming to achieve community cohesion.
	Policy should reflect the scope of the London Plan (policies 3A.17 & 3A.26) and make specific reference to 'Secured by Design' requirements and the principles of 'Safer Places' to create safer and stronger communities (MPA).	CP9 states that Council will contribute towards reducing crime, fear of crime and anti-social behaviour by using design principles that create environments which promote community safety and discourage offending.
<b>CP15:</b> Supporting People	<p>A number of issues were raised with this Policy:</p> <ul style="list-style-type: none"> <li>▪ Too broad</li> <li>▪ The travellers' sites should be in relation to, and in line with, the facilities being made available by all surrounding boroughs.</li> <li>▪ The policy should be split into two policies, one referring to meeting the needs of the Supporting People Strategy and the other to the specific issue of traveller sites.</li> </ul> <p>The GLA advised that the wording was not consistent with London Plan policy 3A.14 which requires that DPD policies should protect existing gypsy and traveller sites, set criteria for identifying the suitability of new sites and identify new sites where shortfalls are identified.</p> <p>In order to be in general conformity this policy must clearly state that the Council will protect sites (as and when these are created) and that the Council will identify new sites in their Sites Schedule in accordance with the location criteria where there is an identified need for such.</p>	<p><i>CP6 – Meeting Particular Housing Needs</i></p> <ul style="list-style-type: none"> <li>▪ The policy is less broad and now addresses requirements for vulnerable adults and, gypsy and traveller sites.</li> <li>▪ Enfield currently has no gypsy and traveller sites and the Gypsy and Traveller Accommodation Needs Assessment (March 2008) identifies that Enfield has the third lowest need for sites within London. The Mayor of London is reassessing the methodology for assessing allocation of sites across London, which is expected to inform the revision of the London Plan. This may result in a need for Enfield to identify sites, however, in the absence of clear and immediate need there is no justification for allocating sites in advance of the consideration of pitch numbers as part of a revision to the London Plan.</li> <li>▪ The provision of two core policies is not justified given the detail provided for each topic.</li> </ul>
	<p>The HBF advised:</p> <ul style="list-style-type: none"> <li>▪ That Lifetime Homes is not mandatory and this should be reflected in the policy.</li> <li>▪ The housing industry has agreed that all new homes should reach Level 6 of the Code for Sustainable Homes by 2016. They would therefore welcome the support of the Council in helping the housing industry manage the gradual transition towards code level 6.</li> </ul> <p>The GLA stated that the wording of the policy is not consistent with London Plan 3A.5 which requires that DPD policies should seek to ensure that all new housing is built to lifetime standards and that 10% of new housing is designed to be wheelchair accessible or easily adaptable for wheelchair users.</p>	<p>Details regarding the provision of Lifetime Homes, the Code for Sustainable Development and wheelchair accessible homes is found in <i>CP4 – Housing Quality</i>.</p> <ul style="list-style-type: none"> <li>▪ The London Plan states all new housing should be built to lifetime standards (3A.5), as does CP4.</li> <li>▪ Council is only seeking a minimum level 3 for the Code for Sustainable Development at this stage.</li> <li>▪ CP4 also states that Council will seek to achieve a borough-wide target of 10% of all new homes to be suitable or easily adaptable for wheelchair users.</li> </ul>

Section/ Topic/ Core Policy	Summary of main issues	Outcome/ Relevant section CP in the Pre-Submission Report
<b>CP16:</b> Children and young People	<p>The GLA raised a number of objections to this policy:</p> <ul style="list-style-type: none"> <li>▪ The policy fails to include criteria based approach for the provision and expansion of education facilities as required by London Plan Policy 3A.24. The supporting text suggests that these would be included within the 'Development Management Document' SPD. This would significantly harm the implementation of this policy. Criteria such as these should be included within a DPD.</li> <li>▪ The policy fails to reflect London Plan Policy 3A.25 which requires DPDs to address the needs of the higher and further education sectors within the Borough.</li> <li>▪ The policy fails to adequately reflect the requirements of London Plan policy 3D.13 and the Mayor's SPG on providing for children's and young people's play and informal recreation, in that it does not make clear that new residential developments should make provision, based on expected child populations. It is suggested that the standards for children's play space should be included in DPD policy.</li> </ul>	<p><i>CP8 – Education</i></p> <ul style="list-style-type: none"> <li>▪ The policy now provides details of facilities to be provided over the 15-year time frame of the Core Strategy.</li> <li>▪ Sites for facilities within the Strategic Growth Areas will be identified in the AAPs. Elsewhere in the Borough strategic sites will be identified and safeguarded in the Sites Allocation DPD.</li> <li>▪ Paragraph 8.15 under <i>CP34: Parks, Playing Fields and Other Open Spaces</i> makes reference to children's recreation: "The London Plan provides the most recent assessment of requirements for children's play space in London and, as such, should replace the standards recommended in Enfield's Open Space Study (2006). The policy therefore reflects London Plan Policy 3D.13 and the Mayor's SPG on Providing for Children and Young People's Play and Recreation (2008)."</li> </ul>

## Chapter 6 - Economic Development and Enterprise

Section/ Topic/ Core Policy	Summary of main issues	Outcome/ Relevant section CP in the Pre-Submission Core Strategy document
Economic Development and Enterprise	There was general support for the principles in this section. The GLA particularly welcomed the broad support to employment.	
Introduction	Concerns raised were:	
	<p>Policies need to reflect the Mayor's SPG on industrial land, which has recently been published, as well as London Plan policy. In particular the definitions of employment land need to be reviewed and the identification of locally important sites should be carried out in the context of the criteria set out in the SPG (GLA).</p>	<p>Policies are now in accordance with the Mayor's SPG on Industrial Land which supports the use of surplus industrial land to provide for a mix of other uses such as housing and social infrastructure.</p> <p>The definitions of SIL and LSIS will be provided within the Pre-Submission Report. In line with the London Plan, SILs will be divided into two types: Preferred Industrial Locations (PIL) and Industrial Business Parks (IBP).</p>
	<p>1-6ha of employment land being available for release seems low in the context of the pan-London study. This discussion should also consider that within mixed use developments the employment rates can increase</p>	<p>Council acknowledges this and has appointed consultants to provide an update to the Employment Land Study that was undertaken in 2006 (due end 2009/ early 2010).</p>

Section/ Topic/ Core Policy	Summary of main issues	Outcome/ Relevant section CP in the Pre-Submission Core Strategy document
	considerably (NLSA).	Council has reviewed the boundaries of the former Preferred Industrial Areas (PIA) as identified in the UDP 1994 in partnership with the GLA. Through review it was identified that there is scope to release land for mixed use development in a limited number of former PIAs without compromising the overall range and quality of employment land available.
	Supports SOs 12 and 13 but subject to the inclusion of a commitment to tackling barriers to employment. Although the need to develop skills is included as factor which enables residents of the Borough to access the labour market, there are a number of additional important barriers to employment that should be addressed (GLA).	<p><i>SO7: Employment and Skills</i> deals with employment and skills – this includes “to tackle the barriers to employment facing particular sections of the community”</p> <p><i>CP16: Taking Part in Economic Success and Improving Skills</i> provides more information.</p> <p>Additionally this is complemented with <i>CP8: Education</i>.</p>
<p><b>Core Policy 17:</b> The Scale and Location of Employment Activities</p>	<p>There was general support for the principles in this policy. Particular support was expressed concerning:</p> <ul style="list-style-type: none"> <li>▪ Welcomes the clarification of the limited release to other uses of land designated for employment (LSC).</li> <li>▪ Welcomes the flexibility in CP17, the safeguarding of SEL as defined under the London Plan, the identification of LSES and the progressive release of sites outside of these designations where they do not meet the needs of modern businesses.</li> <li>▪ Support the policy to set out economic, land use and demand based criteria for the assessment, management and release of LSES and other smaller industrial sites for other uses, principally housing (RPS group for Fairview New Homes Limited).</li> <li>▪ Supports the objectives of CP17 facilitating the structured consolidation of the CL SEL to promote intensification and managed release of unproductive or inefficient sites for alternative uses (GL Hearn for Tesco Stores Ltd).</li> <li>▪ Extension of the Freezywater SIL to include part of Innova (GLA).</li> </ul>	
	This section needs to make reference to:	
	Do not support the proposed policy statement that this release will be concentrated on smaller industrial sites. Suggests that appropriately sited large sites for housing are in short supply, therefore, there is a counter intuition in	The Council's objective is to strengthen the role of the industrial sites in NEE and CL which are in employment use. The boundaries of the former PIAs have been reviewed in partnership with the GLA to identify and safeguard industrial land which

Section/ Topic/ Core Policy	Summary of main issues	Outcome/ Relevant section CP in the Pre-Submission Core Strategy document
	wording a policy to resist the redevelopment of any larger industrial sites (Fairview New Homes Ltd).	is of strategic importance. The review has identified scope to release land for mixed use development in a limited number of former PIAs without compromising the overall range and quality of employment land available in the Borough.
	Council acknowledges that there was a theme within the responses to the Core Strategy Issues and Options paper that the loss of small scale business locations is having a detrimental effect. It thus makes little sense to encourage their further loss for housing whilst maintaining inappropriately sited large scale industrial sites (Fairview New Homes Limited).	<p>Through <i>CP13: Promoting Economic Prosperity</i>, the Council will protect and improve Enfield's employment offer helping to facilitate the creation of 6,000 new jobs, focussing new growth in the ULV area and Enfield's town centres.</p> <p><i>CP14: Safeguarding Strategic Industrial Land</i> and <i>CP15: Locally Significant Industrial Sites</i> protect employment land of the right type and in the right location to achieve economic prosperity and job growth. Furthermore, where sites are designated as LSIS 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 a comprehensive master plan, in order to facilitate urban regeneration.</p>
	Support the policy to set out economic, land use and demand based criteria for the assessment, management and release of LSES and other smaller industrial sites for other uses, principally housing, where it can be demonstrated they no longer meet the needs of modern industry business (Fairview New Homes Ltd).	Paragraph 6.28 of the Pre-Submission Report addresses the concerns that have been raised here. The Council owns and manages a number of industrial estates in the Borough, some within the place shaping priority areas. The Industrial Estates Action Plan (this is a review of the Council's own industrial land portfolio to assess the range of the employment offer and the potential of the estates to support enterprise) it will include an analysis of each estate and consider options for the future including options for use, access, safety and appearance as well as opportunities to support enterprise growth. Phase 1 of the Action Plan is expected to be completed in 2010.
	Refers to the draft SPG that any industrial land released must be reused to meet strategic as well as local priorities and that housing, will be the foremost priority, closely followed by social infrastructure such as health, education and emergency services (HBF).	Explanation is provided in paragraph 6.26. The policies in this section of the Pre-Submission Report accords with the Mayor of London's Industrial Capacity SPG which supports the use of surplus industrial land to provide for a mix of other uses such as housing and social infrastructure. It is also in line with the objectives set out in the government's draft PPS4: Planning for Sustainable Economic Development, which stresses the need for a critical approach to be taken towards allocating employment land, particularly land with single or restrictive uses, if there is no realistic prospect of it being used as such during the plan period. Draft PPS4 asks Local

Section/ Topic/ Core Policy	Summary of main issues	Outcome/ Relevant section CP in the Pre-Submission Core Strategy document
		Planning Authorities to consider the potential for regeneration in their plans and to prioritise deprived areas for development.
	Does not cover the whole range of enterprise needs in terms of office space and affordable business units, and their location in areas of activity (Enterprise Enfield).	No specific reference mentioned in CPs within Chapter 6 of the Pre-Submission Report. However, the spatial strategy makes a commitment across the Borough that locally significant employment estates will continue to provide an affordable and convenient resource for small businesses and new enterprises.
	Objects in relation to logistics in that they need to be located in the east of the Borough for the local north – south roads (Enterprise Enfield).	The Council's objective is to strengthen the role of the industrial sites in NEE and CL which are in employment use. Most of the Borough's industrial land lies in the ULV. NEE and CL together account for 83% of the Borough's industrial land and provide differing employment offers.
	Observations were made on this policy to be partly general and partly specific to Enfield. It should be revised to focus on location specific issues relating to employment activity (GOL).	<i>CP14: Safeguarding Strategic Industrial Land</i> and <i>CP15: Locally Significant Industrial Sites</i> now deal specifically with safeguarding SIL and safeguarding LSIS.
	Suggest amending the policy to recognise sites, particularly for the area around Angel Road (where retail developments are surrounded by underused or vacant employment sites) should be optimised in accordance with the goals of sustainable and efficient use of land (GVA Grimley for La Salle Investment Management).	<i>CP14: Safeguarding Strategic Industrial Land</i> safeguards Harbet Road (Lee Valley Trading Estate) as SIL. Evidence has suggested that there are a number of sites which are not occupied intensively for industry such as the land at Meridian Way, Glover Drive and Kimberly Road, these sites have the potential for change to support urban regeneration.  CP38 on Meridian Water deals specifically with this matter.
	Suggest amending the policy to enable transformation of certain areas within SEL through intensification and introduction mixed uses (GVA Grimley for La Salle Investment Management).	See <i>CP14: Safeguarding Strategic Industrial Land</i> and <i>CP15: Locally Significant Industrial Sites</i> . Within CP15, 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.  The core policies on places (CPs 37-45) introduces mixed uses.
	Concern over the approach taken to the assessment and the categorisation of existing employment sites in determining their potential for release – sites in ownership of National Grid have been erroneously classified (First Plan for National Grid Property Holdings).	The boundaries of the former PIAs have been reviewed in partnership with the GLA to identify and safeguard industrial land which is of strategic importance to London and is appropriate to be designated as SIL. The review will be made available in the Council's forthcoming update to the 2006

Section/ Topic/ Core Policy	Summary of main issues	Outcome/ Relevant section CP in the Pre-Submission Core Strategy document
		employment land study.
	Refers to the London Plan SPG on Industrial Capacity (March 2008), which seeks to focus consolidation to the periphery of the SILs, especially where there is a barrier separating the area from the rest of the SIL (First Plan for National Grid Property Holdings).	<i>CP14: Safeguarding Strategic Industrial Land</i> is in accordance with the London Plan and its supporting draft Industrial Capacity SPG.
	Level of land proposed for release too low given the indicative industrial land release benchmarks set out in the London Plan SPG on Industrial Capacity. Notwithstanding this, the management of existing employment land must consider the range of policy objectives in considering the scale and location of employment generating activities including those of regeneration and provision of housing as well as site specific considerations (First Plan for National Grid Property Holdings).	<p><i>CP14: Safeguarding Strategic Industrial Land</i> will result in the release of approximately 26ha of previously designated employment land for other uses.</p> <p><i>CP15: Locally Significant Industrial Sites</i> safeguards LSISs. 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 regeneration.</p>
	The likelihood that particular sites in the SILs will be developed for employment purposes must also be a key consideration. It is not simply a matter of having a certain level of employment land supply identified, there must also be a reasonable prospect that the supply identified will become available in the plan period (First Plan for National Grid Property Holdings).	<p>The Council's objective is to strengthen the role of the industrial sites in NEE and CL which are in employment use. These sites are busy, generally well-occupied, and are strategically important for Enfield, the sub-region and London as a whole.</p> <p>The boundaries of the former PIAs as identified in the UDP 1994, have been reviewed in partnership with the GLA to identify and safeguard industrial land which is of strategic importance to London and is appropriate to be designated as SIL. The review has identified scope to release land for mixed use development in a limited number of former PIAs without compromising the overall range and quality of employment land available in the Borough.</p>
	Allows the release for LSISs and other smaller industrial sites for other uses, it makes specific reference to housing which would exclude the police facilities. This does not accord with Policy 3B.4 of the London Plan. Accordingly it is recommended the policy recognises policing facilities as an appropriate alternative use to employment land by making reference to "policing facilities" in the 5 <sup>th</sup> bullet point (CGMS for Metropolitan Police).	<p>CP15 deals with LSISs. Reference is made within the policy that 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 regeneration.</p> <p>This could then include policing facilities but this would be addressed in the Development Management DPD.</p>

Section/ Topic/ Core Policy	Summary of main issues	Outcome/ Relevant section CP in the Pre-Submission Core Strategy document
		Supporting community cohesion is covered under CP9.
	Potential release of industrial land where it is demonstrated to be surplus to requirements however, only up to 6 ha of land to be released to 2016 identified. This appears to conflict with the 4 <sup>th</sup> criteria of the same policy which promotes the “structured consolidation of the CL SEL to promote intensification and the managed release of unproductive or inefficient sites” as well as the preferred option for CL promoted in Chapter 10 (RPS).	CP14 will result in the release of approximately 26ha of previously designated employment land for other uses. The potential to offset this has been identified through the extension of the SIL designation in parts of CL and NEE, such as the inclusion of the Edmonton Eco Park, the Aztec 406 development site and Innova Park representing a gain of approximately 59ha [26ha + 17ha + 16ha] of land towards SIL and resulting in an overall net gain of 33ha of SIL.
	Objects to the release of up to 6ha at CL, which would not deliver the vision for the area as proposed (RPS).	CP14 safeguards the area covered by Harbet Road (Lee Valley Trading Estate) as SIL, with the remainder (Kimberly Road, land at Glover Drive and Meridian Way) covered within CP38 – Meridian Water.
	Recommends that an up to date assessment be undertaken to identify the appropriate scale of release of land at CL (RPS).	Evidence suggests that there are a number of sites which are not currently occupied intensively for industry such as land at Meridian Way, Glover Drive, Kimberly Road and the southern parts of Brimsdown.  CP38 deals with Meridian Water. The CL AAP will set out the detailed planning framework for development. A masterplan for Meridian Water will be developed and will be incorporated into the LDF as a SPD.
	In relation to the extension of Freezywater SEL to include Innova Park raises concerns about significant growth in employment uses in this location and the potential to generate traffic on the SRN – it is essential that the Council undertakes a study to evaluate the impact of all development in the ULV / NEE on the SRN (HA).	The Industrial Estates Action Plan will include an analysis of each estate and consider options for the future including options for use, access, safety and appearance as well as opportunities to support enterprise growth.  A Transport Assessment has informed the Pre-Submission Report.
	With regard to the identification of LSEs and the proposed release of 6ha of employment land - recommends that CP17 be updated so it seeks to safeguard sites with good access to public transport for travel intensive uses; and reallocate sites with poor access to public transport for less travel intensive uses (HA).	The Council's objective is to strengthen the role of the industrial sites in NEE and CL which are in employment use. These sites are busy, generally well-occupied, and are strategically important for Enfield, the sub-region and London as a whole. This approach is supported by the findings of the North London (2005) and Enfield Employment Land Study (2006) and Update (2009) and with the initial proposals for a New Plan for London (April 2009).
	A plan, monitor and manage approach to the release of industrial land which focuses on release of smaller sites is required by strategic policy and the policy should reflect this (GLA).	CP14 safeguards SILs and CP15 safeguards LSISs. The Council is undertaking a review of its own industrial land portfolio to assess the range of employment it has to offer and the potential of the estates to support enterprise. This will inform the formulation of an Industrial

Section/ Topic/ Core Policy	Summary of main issues	Outcome/ Relevant section CP in the Pre-Submission Core Strategy document
		Estates Action Plan and review of CP15.
	With regard to a structured consolidation of the CL SEL (now SIL) - this policy must make reference to the need to deliver the necessary public transport provision to ensure sustainable travel behaviour, the need for land for transport purposes to support growth and the need to support freight requirements as part of any release of industrial land for other uses (GLA).	More detail is covered within <i>CP38: Meridian Water</i> , the CL AAP, further work to be undertaken as part of the master planning work for Meridian Water, and the IDP to accompany the Pre-Submission Report.
	It was suggested that additional policies should:	
	Would like to see a specific policy commitment that developers will be required to maximise the benefits of employment through local recruitment and skills development programmes for their workforce (LSC).	No specific requirement has been made within the Core Strategy. However, <i>CP46: Infrastructure Contributions</i> includes a list of provisions to be considered in obligations and this includes: learning and skills facilities.
<b>Core Policy 18:</b> Promoting Economic Prosperity and Developing the Skills and Employment Opportunities of Local People	There was general support for the principles in this section. Particular support was expressed concerning: <ul style="list-style-type: none"> <li>▪ CP18 provides a very helpful framework around which to plan skills development (LSC).</li> <li>▪ CP18 subject to the inclusion of an additional bullet point that seeks to address barriers to employment (GLA).</li> </ul>	
	Concerns raised were:	
	Suggest there needs to be a more supportive approach to the requirements of the most disadvantaged in the community, and to overcome what will be a declining situation in terms of worklessness – training, education and elements to support people into self-employment (Enterprise Enfield).	<i>CP16: Taking Part in Economic Success and Improving Skills</i> aims to promote economic prosperity and sustainability in the Borough by a robust strategy to improve the skills of Enfield's population. Enfield's Skills and Employment Strategy (2008) sets out an action plan to increase jobs and wealth in Enfield, tackle worklessness and poverty and create a more socially cohesive Borough.
	The policy should include office space for planned increase, these should be town centre based to assist in the mix, and provide customers for retail uses, whilst living in the housing identified within the Core Strategy. In addition, there should be incubation enterprise units (Enterprise Enfield).	ET and Southgate are the main focus of office accommodation in the Borough. See <i>CP19: Offices</i> .  It is noted within the Core Strategy paragraph 6.71 that Enfield lacks suitable accommodation for small business. Where it exists, it is well occupied, for example the BIC site and BIC2 at Innova Park. Enterprise Enfield has recently reported a huge growth in enquiries from people seeking to set up a new business, however there is a limited supply of suitable premises in Enfield. The ET AAP will identify the mix of uses including the amount and location of

Section/ Topic/ Core Policy	Summary of main issues	Outcome/ Relevant section CP in the Pre-Submission Core Strategy document
		new office development within the vicinity of ET rail station.
	This section needs to be developed in parallel with the other sections, including social and leisure activities (Enterprise Enfield).	This section of the Pre-Submission Report now includes core policies on town centres (CP17), delivering shopping provision across Enfield (CP18) and offices (CP19).  Policies relating to recreation, leisure, culture and arts, are covered under CP11, the policy on health and social care facilities and the wider determinants of health is covered under CP7.
	There needs to be a more fundamental, far reaching review of regeneration, enterprise, skills, education and tackling of worklessness (Enterprise Enfield).	As part of <i>CP16: Taking Part in Economic Success and Improving Skills</i> , a new outreach employment services will be developed in the place shaping priority areas such as Ponders End and Edmonton; Council will develop Employment Education Partnerships and investigate an alliance with an existing education partner or another establishment to upskill the local workforce to compete more effectively for higher order jobs; the Council will undertake a Local Economic Assessment to provide the content and evidence to underpin an Enfield Economic Development Strategy which supports businesses and business enterprise.
	Observations were made on this policy to be partly general and partly specific to Enfield. It should be revised to focus on location specific issues relating to employment activity (GOL).	<i>CP16: Taking Part in Economic Success and Improving Skills</i> revised. Council is committed to tackling worklessness, creating new jobs in the Borough and working to ensure that local residents are able to access existing and new jobs.
	There should be reference to the role of town centres as employment centres (NLSA).	Reference is made within paragraph 6.42 and recognises that town centre activities significantly contributes to the local economy by providing jobs and retaining expenditure within the local area.
	Suggest that the importance of developing the already significant contribution of retail and service employment sectors should be emphasised (DTZ for St Modwen).	CP17 deals specifically with Town Centres. The concentration of new development within the Borough's town centres will help to maintain, enhance and support their vitality and viability. This is in accordance with national policy, the London Plan and the Community Strategy objective of strengthening the Borough's town centres.
	Recommends CP18 is reworded to state that benefits of regeneration should be maximised by improving sustainable transport links (HA).	More details found in Chapter 9 – Core Policies for Places and within the AAPs and supporting master planning work.
	This policy should seek to address barriers to employment (GLA).	Embedded within <i>CP16 – Taking Part in Economic Success and Improving Skills</i> - promote good employment practices, such as the provision of flexible working opportunities to make jobs more accessible,

Section/ Topic/ Core Policy	Summary of main issues	Outcome/ Relevant section CP in the Pre-Submission Core Strategy document
		combined with access to affordable childcare; and continue to promote advancement opportunities and to tackle inequalities in progression in employment.

## Chapter 7 - The Open and Built Environment

Section/ Topic/ Core Policy	Summary of main issues	Outcome/ Relevant section CP in the Pre-Submission Core Strategy document
<b>Core Policy 19:</b> Green Belt and Countryside	There was general support for the principles in this policy. Particular support was expressed for: <ul style="list-style-type: none"> <li>▪ The overall objective of safeguarding the green belt.</li> <li>▪ A review of the green belt boundaries.</li> </ul>	
	Concerns raised were: <ul style="list-style-type: none"> <li>▪ There should be a more detailed review of the green belt boundary, in particular to:                             <ul style="list-style-type: none"> <li>○ identify those areas suitable for release in order to accommodate new housing development and meet a shortfall in housing land supply (GL Hearn for Hadley Homes).</li> <li>○ take into account individual site representations (Planning Potential for Diocese of London, Clutton LLP).</li> </ul> </li> <li>▪ The key purpose of a core strategy policy on green belt is to set the boundaries. The policy should be clear whether the green belt boundary will be revised or not (GOL).</li> </ul>	Noted. It is considered that special circumstances exist to justify a strategic review of the green belt in the north east of the borough. Proposals for changes to the detailed green belt boundary will be brought forward as part of the Development Management DPD. This is mentioned in the justification to CP33: <i>Green Belt and Countryside</i> .
	<ul style="list-style-type: none"> <li>▪ Policy needs to be clear in terms of implementation and monitoring otherwise it is unsound.</li> <li>▪ The illustrative maps in Appendix 2 are confusing</li> </ul>	<p>CP33 has implementation and monitoring sections.</p> <p>The illustrative maps have been amended and explanatory text is set out.</p>
	It was suggested that the policy should: <ul style="list-style-type: none"> <li>▪ Set out locally specific criteria to guide decisions on development proposals in the green belt.</li> <li>▪ Include criteria for assessing development in the green belt.</li> </ul>	<p>Proposals for development in the green belt will generally be assessed according to national and regional guidance as set out in PPG2: Green Belts and the London Plan.</p> <p>Some locally specific development criteria will be set out in the Development Management DPD.</p>
	Take account of essential operational sites within the Green Belt (TW).	Noted in CP33. The policy now acknowledges the need for utilities companies to be able to carry out their statutory functions.
	<ul style="list-style-type: none"> <li>▪ Consider the opportunity to de-designate the built up areas of Picketts Lock within the LVRP site to support regeneration.</li> </ul>	Middlesex University's Trent Park campus and the Picketts Lock leisure complex are identified as Major developed sites in the green belt in recognition of their future

Section/ Topic/ Core Policy	Summary of main issues	Outcome/ Relevant section CP in the Pre-Submission Core Strategy document
	<ul style="list-style-type: none"> <li>▪ Consider the redevelopment potential of Middlesex University sites (CGMS Consulting for Middlesex University).</li> <li>▪ Include residential development as part of a package which seeks to provide or enhance the leisure and employment services offer in the green belt, such as the Lee Valley, Middlesex University Trent Park campus, Picketts Lock and Crews Hill (HBF).</li> </ul>	<p>redevelopment and improvement.</p> <p>CP33 states that where existing uses become redundant, the Council will work with partners to prepare planning briefs or masterplans to guide future development. .</p> <p>Furthermore, the NEE AAP will set out the context for a more detailed master plan/ planning brief for Picketts Lock.</p>
<p><b>Core Policy 20:</b> Parks, Playing Fields and Other Open Spaces; Green Links and Waterways</p>	<p>There was general support for the principles in this policy. Particular support was expressed for:</p> <ul style="list-style-type: none"> <li>▪ Addressing deficiencies in the quality, range of facilities in, and access to open spaces.</li> </ul>	
	<p>Concerns raised were:</p> <ul style="list-style-type: none"> <li>▪ Any extension to MOL designation should not include private open spaces (CGMS Consulting for Fairview Homes).</li> <li>▪ Policy needs to be clear in terms of implementation and monitoring otherwise the policy is unsound.</li> <li>▪ The use of parks and playing pitches for formal, organised sporting activities and the employment potential of such uses (LSC).</li> <li>▪ Should reflect the requirements of London Plan Policy 3D.13 and the Mayor's SPG on providing for children's and young people's play and informal recreation.</li> <li>▪ The policy should only refer to public playing pitches, and not private playing pitches.</li> </ul>	<p>Noted in CP34: Parks, Playing Fields and Other Open Spaces. This policy has been amended as follows:</p> <ul style="list-style-type: none"> <li>▪ It considers the provision of children's and young people's play space in line with London Plan Policy 3D.13 and the Mayor's SPG. Further details on the standards for children's play will be considered through the Development Management DPD.</li> <li>▪ It seeks to maximise the potential for parks and playing pitches to be used for formal, organised sporting activities.</li> </ul> <p>Any extensions to MOL designations will have regard to the MOL criteria set out in the London Plan.</p> <p>This core policy has implementation and monitoring sections.</p> <p>The playing pitch policy point has been removed from CP34. Council seeks by way of a partnership agreement to increase public provision to support community use of non-public playing pitches.</p>
	<p>The hierarchy of open spaces should reflect the London Plan hierarchy and be included in a DPD (LVRPA, GLA).</p>	<p>The hierarchy of open spaces will use the London Plan hierarchy as its starting point, and it will be provided in the Development Management DPD.</p>
	<p>This section needs to make reference to:</p> <ul style="list-style-type: none"> <li>▪ The waterways/blue ribbon network in Enfield, particularly the Lee Navigation, Turkey, Salmons and Pymmes Brook. A separate policy should be drafted (BW).</li> <li>▪ Improving access to open spaces and the potential for river restoration set out in the North London River</li> </ul>	<p>Noted. <i>CP35: Lee Valley Regional Park and Waterways</i> is a separate policy which has been drafted in order to address these points. CP35 seeks to make the best use of the waterway network; and in doing so it acknowledges the potential for river restoration and opportunities to improve facilities for freight, recreational and educational use.</p>

Section/ Topic/ Core Policy	Summary of main issues	Outcome/ Relevant section CP in the Pre-Submission Core Strategy document
	Restoration Document (BW). <ul style="list-style-type: none"> <li>▪ The need to enhance, restore and protect river corridors and promote freight and recreational use of the canal (EA).</li> </ul>	
	<ul style="list-style-type: none"> <li>▪ Develop improved access across the Borough, through the creation and improvement of green corridors and Blue Ribbon Network.</li> <li>▪ Walking and cycling being promoted by providing links through the Borough's open spaces and built up areas.</li> </ul>	<p>Noted. <i>CP34: Parks, Playing Fields and Other Open Spaces</i> seeks to protect and improve open space provision by increasing the access to, quantity and quality of publicly accessible open space.</p> <p><i>CP30: Maintaining and Improving the Quality of the Built and Open Environment</i> also refers to the Blue Ribbon Network.</p> <p>Furthermore, <i>CP35: Lee Valley Regional Park and waterways</i> seeks to make the best use of the waterway network by looking at opportunities for river restoration, to improve pathways, facilities for freight, recreational and educational use.</p> <p><i>CP25: Pedestrians and Cyclists</i> gives priority to schemes that overcome community severance, including those schemes which create links to the built and recreational resources such as open spaces.</p>
	Should consider other sports and recreation facilities.	<p><i>Considered as part of CP11: Recreation, Leisure, Culture and Arts</i>, which sets out the intention to protect existing assets and provision, and promote and encourage the increased use of recreation and leisure facilities. It considers a broader range of sports and recreation facilities.</p>
	Recommends the adoption of Access to Natural Greenspace Standards so communities have access to a range of recreational needs (Natural England).	Access to natural greenspace (identified as sites of nature conservation) is considered as part of <i>CP36: Biodiversity</i> . The Development Management DPD will set out standards on the basis of local evidence.
<b>Core Policy 21:</b> Biodiversity	There was general support for the principles in this policy. Particular support was expressed for: <ul style="list-style-type: none"> <li>▪ The protection of sites important for nature conservation.</li> </ul>	
	Concerns raised were: <ul style="list-style-type: none"> <li>▪ Policy needs to be clear in terms of implementation and monitoring otherwise the policy is unsound (HBF).</li> <li>▪ Policy needs to be strengthened; it must consider the conservation, enhancement, the need to create new areas of biodiversity value and improve public access (NE &amp; LVRPA).</li> <li>▪ Policy should also protect legally</li> </ul>	<p>Noted in <i>CP36: Biodiversity</i>. This policy has been amended as follows:</p> <ul style="list-style-type: none"> <li>▪ Refers to the need to protect, enhance, restore or add to biodiversity interests.</li> <li>▪ It seeks improvements to biodiversity in order to reduce areas of deficiency in access to nature.</li> <li>▪ It considers protected species</li> </ul> <p>The section includes implementation and monitoring sections.</p>

Section/ Topic/ Core Policy	Summary of main issues	Outcome/ Relevant section CP in the Pre-Submission Core Strategy document
	protected species and BAP priority species GLA). <ul style="list-style-type: none"> <li>▪ Policy should seek to reduce the areas of deficiency in access to nature (GLA).</li> </ul>	
<b>Core Policy 22:</b> Strategic Townscape and Landscape Character	There was general support for the principles in this policy. Particular support was expressed concerning: <ul style="list-style-type: none"> <li>▪ Heritage Land designation does not duplicate other designations (EH).</li> <li>▪ Support tall buildings where they respect and complement local character (Fairview, Kier property developments).</li> <li>▪ Enfield Design Guide is the appropriate place for detailed advice on specific issues (GLA).</li> </ul>	
	Concerns raised were:	
	Policy needs to state who will do what, when and how (HBF).	Policy has been reviewed accordingly. More detail (e.g. standards and design guidance) will be included in the Development Management DPD and Enfield Design Guide.
	The concept of Heritage Land has no statutory basis and should be deleted (HBF).	This designation was originally put forward by EH as part of the development of the Greater London Development Plan. The value of the designation will be examined through the extension of the LBE character appraisal.
	Evidence base to support the identification of local character and locally important skylines and views needs to be in place (EH).	This evidence is in part provided by the LBE Characterisation Study and will be further developed in a forthcoming extension to this work. The results will inform the Development Management DPD and Enfield Design Guide.
	Question need for policy-should cover issues in Development Management DPD (Developer).	Policy content has been reviewed.
	This section needs to make reference to: <ul style="list-style-type: none"> <li>▪ Appropriate and inappropriate locations for tall buildings (GLA).</li> </ul>	Council has committed to a study to investigate where suitable locations might be (as mentioned in CP30), as evidence not currently available. It is suggested that the Lee Valley Opportunity Area may be appropriate in order to assist in regeneration.  It is likely that the Core Strategy will be reviewed in light of this piece of work. More detail will be included in the Development Management DPD, AAPs and the Enfield Design Guide.
	Other: <ul style="list-style-type: none"> <li>▪ What is the relationship of Heritage Land and Registered Parks and Gardens (EH).</li> </ul>	Heritage Land is a more extensive whole-landscape designation based on historic use and character. In the case of the area of green belt in the north west of the Borough,

Section/ Topic/ Core Policy	Summary of main issues	Outcome/ Relevant section CP in the Pre-Submission Core Strategy document
		<p>this is important due to its history as a royal hunting ground.</p> <p>Registered Historic Parks and Gardens are designated using different criteria (and are a national [EH] designation) and are a planned landscape, usually smaller in spatial extent and with their historic character preserved in greater detail. They are therefore only referenced in CP23.</p>
<b>Core Policy 23:</b> Built Heritage	There was general support for the principles in this policy.	
	<p>Concerns raised were:</p> <ul style="list-style-type: none"> <li>▪ Considerable repetition of PPGs 15/16 (GOL).</li> <li>▪ Add reference to the setting of heritage assets as well as the asset itself (EH).</li> </ul>	<ul style="list-style-type: none"> <li>▪ Repetition removed and the local context emphasised where possible.</li> <li>▪ <i>CP31: Built and Landscape Heritage</i> explicitly mentions the setting and context of assets (as well as the asset).</li> </ul>
	<p>The following inaccuracies were highlighted:</p> <ul style="list-style-type: none"> <li>▪ The majority of comments supported designating Areas of Distinctive Quality (The Enfield Society).</li> </ul>	Error acknowledged. An extension to the LBE characterisation study will be undertaken to identify these areas. Bespoke design guidance will be developed as part of the Enfield Design Guide.
	<p>This section needs to make reference to:</p> <ul style="list-style-type: none"> <li>▪ Include the total number of statutorily listed and locally listed buildings within the Borough (EH).</li> </ul>	This is included in Section 8.32 of the Pre-Submission Report.
	<p>It was suggested that additional policies should:</p> <ul style="list-style-type: none"> <li>▪ Ensure that alternative uses are considered for redundant heritage buildings in the Borough' to allow the borough's built heritage to be preserved or enhanced' (MPA).</li> </ul>	This is covered by national and regional policy such as PPG15 and London Plan policy 4B.13.
	<p>OTHER:</p> <ul style="list-style-type: none"> <li>▪ All heritage assets, their setting and the wider historic environment must be identified and valued in documents (EH).</li> <li>▪ The removal of a number of the buildings at Trent Park and their replacement with more suitable development would preserve and enhance the conservation area and setting of the listed buildings and ensure continued stewardship (Planning consultancy).</li> </ul>	<ul style="list-style-type: none"> <li>▪ All assets, their setting and context have been considered in the drafting of CP31 and will be considered in the preparation of the Development Management DPD and Enfield Design Guide.</li> <li>▪ Not a strategic issue. This is an issue for the conservation area management proposals and development management.</li> </ul>

## Chapter 8 - Retailing, Leisure and Culture

Section/ Topic/ Core Policy	Summary of main issues	Outcome/ Relevant section CP in the Pre-Submission Report
<b>The Core Policies and Introduction</b>	There was general support for the principles in this policy.	
	Concerns raised were:	
	No reference is made to the importance of providing localised retail facilities for day to day needs outside of town centres and retail parks. The Core Strategy should recognise the importance of suitably scaled local shopping facilities to help build local communities and achieve sustainable development. It is suggested that a specific policy to this end be introduced.	<i>CP17 – Town Centres</i> The section and accompanying CP17 has been amended to highlight the important role that Enfield's local centres and parades play in the retail hierarchy in providing for the day to day needs of residents.
	8.2.8: The town centre hierarchy should be included in a DPD and not an SPD (GLA).	The Council agrees that the town centre hierarchy should be included within the Core Strategy DPD and has amended CP17 accordingly.
	Winchmore Hill and Highlands Village have the characteristics of a District Centre and should be allocated as such in the Core Strategy (Sainsbury's).	Highlands Village and Winchmore Hill are not designated as district centres due to their size, function and role having regard to the London Plan and the Council's Town Centre Study.
	8.2.6: Relates to the 2007 London Office Policy Review and office supply and demand issues fails to take into account a number of significant factors (Planning Works Ltd).	Paragraph 6.63 states that there is limited demand from major occupiers for office uses in Outer London locations like Enfield. It emphasises that a careful approach should be taken to managing supply and location of offices uses in the Borough.
	Policy is appropriate, but would benefit from redrafting. Material on the roles of centres should be moved to the beginning of the policy to emphasise the hierarchy (GOL).	The policy has been amended.
	This section needs to make reference to:	
	8.1.1: There is limited potential demand for convenience goods floorspace within the Borough up to 2013, and no need for new food stores for the foreseeable future. Since PPS6 does not require proposals for retail development in town centres to demonstrate need, there should be an acknowledgement that increased convenience floorspace within existing town centres will be encouraged to support vitality and viability (Sainsbury's).	The policy is explicit in supporting retail uses within the centres identified as a means to support their vitality and viability. However, the Council's Retail Study update indicates that there is need for a large food store in the Southgate area, but that proposals in New Barnet, if implemented, will negate the need for this in the short term to 2015.
	Request that the Council identifies on the new proposals map, their existing stores as follows: 1. Southbury Road, Enfield. 2. Aldermans Hill, Palmers Green (Morrisons).	See comments in response to Appendix 2: Illustrative Maps.

Section/ Topic/ Core Policy	Summary of main issues	Outcome/ Relevant section CP in the Pre-Submission Report
<b>CP24:</b> Town Centres	There was general support for the principles in this policy. Particularly support was expressed from the GLA, Enterprise Enfield and Tesco. Tesco support the Council's strategic policy objectives of strengthening and regenerating Enfield's town centres by focusing projected demand for further retail floorspace within Enfield Town, the designated District, Local Centres and existing retail parks.	
	This section needs to make reference to:	
	Desire to protect existing offices should be balanced not only against the "need" for such accommodation but also against the benefits to the town centre of what is to be provided in their place.	<i>CP17: Town Centres &amp; CP19: Offices</i> CP19 states the support to retain offices in ET and around the station, as well as Southgate. In other areas, their conversion or part of a mixed use development can be considered.
	Encouragement of major development in Enfield should not undermine the ability of other district centres to accommodate future growth.	CP17 recognises the role of each centre within the retail hierarchy.
	Future policies relating to the mix of permitted class A retail and other uses should be evolved through close consultation with key stakeholders.	The level of non retail uses within each centre will be identified within the Development Management DPD. The public and stakeholders will be consulted on this document.
	Emerging DPDs should support the objective of introducing police 'shops' into locations with good accessibility e.g. town centres (MPA).	Referred to under CP10 on essential services.
<b>CP25:</b> Retail Parks	There was general support for the principles in this policy. Particularly support was expressed from Enterprise Enfield and Tesco. Tesco supports the intensification of existing retail and leisure uses within existing retail parks where such proposals increase the overall sustainability and accessibility of these sites.	
	Concerns raised were:	
	Policy not in general conformity with London Plan policies 3D.2 and 2A.8. 3D.2 requires that DPD policies should treat proposals for out of centre development or for intensification or expansion of existing out of centre retail facilities in line with 2A.8. 2A.8 requires that boroughs use the network of town centres shown on Map 3D.1 as the	<i>CP18: Delivering Shopping Provision Across Enfield</i> The policy has been amended to take on board the GLA's comments with the statement 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

Section/ Topic/ Core Policy	Summary of main issues	Outcome/ Relevant section CP in the Pre-Submission Report
	<p>basis for policy development and delivery within them. It states that DPD policies should identify future levels of retail and other needs in light of integrated local and strategic assessments and enable the supply of capacity to meet these and develop and enhance the network of centres shown on Map 3D.1. The wording of the policy should make it clear that proposals for out of centre development or for intensification or expansion of existing out of centre retail facilities will only be considered where they cannot be accommodated within or on the edge of established town centres both within and outside the Borough and include measures to increase the overall sustainability and accessibility of the retail park in question (GLA).</p>	<p>could be directed to existing retail parks, if it can be demonstrated that there will not be a negative impact on the vitality and viability of existing centres and that the development increases the overall sustainability and accessibility of the retail park in question."</p>
	<p>CL AAP will largely address any potential retail increase around Glover Drive. However, the importance of assessing rigorously the potential impact of possible further extensions to retail development in the Glover Drive area on local shopping centres, and avoiding actions which will have negative impact on the vitality and viability of Tottenham High Road as a retail centre for Haringey (LB of Haringey).</p>	<p>The intention is for a new local centre to be established at Meridian Water, as part of the proposals in the CL AAP, to serve the new local community to be established there.</p>
	<p>This section needs to make reference to:</p>	
	<p>Road access to the retail parks needs to be improved as well as public transport.</p>	<p>CP18 refers to the need for retail park development to increase the overall sustainability and accessibility of the retail park in question.</p>
	<p>Consider that a more explicit definition of the sustainability criteria that the Council will utilise in assessing relevant proposals/or cross reference to CP1: Sustainable and efficient land use; CP2: Sustainable design and construction should be made within CP25 (Tesco).</p>	<p>Sustainability is addressed in SO2: <i>Environmental Sustainability</i> and in CP20: <i>Sustainable Energy Use and Energy Infrastructure</i>. Further details will be supplied in the Development Management DPD and Enfield Design Guide.</p>
<p><b>CP26:</b> Leisure &amp; Culture  <b>CP27:</b> Tourism</p>	<p>There was general support for the principles in this policy/section. In particular, support was expressed concerning:</p> <ul style="list-style-type: none"> <li>▪ Policies that will protect Enfield's existing leisure and cultural facilities and encourage new developments.</li> <li>▪ The 1% arts contribution (however there was support to extend this to apply this to developments over £1million).</li> <li>▪ Recognition of the importance of 'policing' issues to support</li> </ul>	

Section/ Topic/ Core Policy	Summary of main issues	Outcome/ Relevant section CP in the Pre- Submission Report
	<p>development proposals relating to the evening and night-time economy in town centres (MPA).</p> <ul style="list-style-type: none"> <li>▪ The intent of this policy is welcomed and supported provided it conforms to with revised London Plan policies 3D.4 and 3D.5 and 3D.7 (GLA).</li> </ul>	
	<p>Concerns raised were:</p>	
	<ul style="list-style-type: none"> <li>▪ The 1% levy for the arts is admirable, however, there are other equally deserving causes that should not be overlooked e.g. social enterprises or start up business support (Enterprise Enfield).</li> <li>▪ The 1% contribution for public art must be considered carefully, as this could become a large and onerous contribution. Recommend the fixed percentage is removed allowing for site specific consideration (St Modwens, Fairview New Homes Ltd).</li> <li>▪ Contributions towards local art projects should be reviewed in the same manner as all other planning gain and should not therefore be expressed as an absolute planning requirement (Fairview New Homes Ltd).</li> </ul>	<p><i>CP11 – Recreation, Leisure, Culture &amp; Arts</i>                      CP11 encourages a contribution from the cost of major, mixed use developments towards a wide range of local cultural and arts projects, prioritising the commissioning of art as part of planned public realm improvements. Specific criteria for contributions through the use of the Percent for Art mechanism will be included in the Development Management DPD.</p>
	<p>Sufficient regard needs to be paid to the distribution of, and accessibility to, leisure and cultural facilities, and how engaging these facilities are to different communities and age groups.</p>	<p>CP11 incorporates and support the Enfield's Arts and Creativity Strategy 2009 – 2013 and Everybody Active: Enfield Sport, Physical Activity and Physical Education Strategy 2009 – 2012. Both Strategies state objectives and actions to better engage different communities and age groups, and ensure sufficient regard is paid to the distribution of, and accessibility to, leisure and cultural facilities.</p>
	<p>The following inaccuracies were highlighted:</p>	
	<ul style="list-style-type: none"> <li>▪ Interprets hotel accommodation in an unreasonably restrictive manner by assuming that it is solely focused on tourism – many hotels are in existence to serve the business community.</li> <li>▪ Business visitors to the Borough would prefer hotel accommodation to be located at sites other than the town centres, such as in the proximity of commercial activities and employment areas (Kier Property Developments Ltd and the Ponders End Trust).</li> </ul>	<p><i>CP12 – Visitors and Tourism</i>                      The supporting text to CP12 acknowledges that visitors to Enfield are attracted by many different reasons, and the business market is a considerable influence in driving the tourism economy in London. The Council supports proposals for a wide range of visitor accommodation, providing these are in locations with good public access or in regard to the ULV, when accompanied by proposals to improve public transport accessibility.</p>

Section/ Topic/ Core Policy	Summary of main issues	Outcome/ Relevant section CP in the Pre-Submission Report
	This section needs to make reference to:	
	Need to give people more information about changes to services (e.g. the move of the Central Library to Thomas Hardy House).	Specific information about improvements and changes to services is included in CP11.
	<ul style="list-style-type: none"> <li>▪ Tourism – the policy on infrastructure could be expanded to allow deals between hotel/visitor attractions with colleges and other providers, so that local people acquire the skills needed to secure sustainable local jobs (LSC).</li> </ul>	<p>The need for conference facilities in the Borough, and training for young people can be met in several ways. There are many connections being made between the public, private, voluntary, education/training providers, and the Council is progressing a number of initiatives. These initiatives include (but are not limited to):</p> <ul style="list-style-type: none"> <li>▪ Development projects at Millfield Arts Centre and Forty Hall &amp; Estate to provide conference facilities as well as community activities and cultural programming. Training initiatives are linked into these projects through the Future Jobs Fund and the Summer Work-out funding streams.</li> <li>▪ Apprenticeships based in Cultural Services are being pursued, including Construction and the Built Environment (expected 2009/10) and Creative and Media (2010/11).</li> <li>▪ As part of the BSF programme, working with teachers to promote linkages between Cultural Services and Enfield schools, specifically those schools with current and future BSF status.</li> <li>▪ Working in partnership with Southgate College and Winchmore School to provide training opportunities at the Council for Hospitality/Tourism and Town Twinning, which will start later this financial year.</li> </ul> <p>The Council is developing a draft Tourism Strategic Plan to enable further discussions with Visit London (the regional tourism agency) to facilitate investment in the Borough. The Plan will focus on encouraging strategic links between training providers and tourism packages, and other promotional opportunities.</p>
	Facilities for major leisure and entertainment use should be concentrated in the town centre – to enliven the surrounding area in the evening, and provide regular custom for local bars and restaurants outside normal working hours (The Theatres Trust).	<ul style="list-style-type: none"> <li>▪ CP17 states that development proposals which foster a diverse evening and night time economy in ET and the Borough's district centres of Edmonton Green, Angel Edmonton, Southgate and Palmers Green will be supported providing that measures are in place to address issues such as community safety, policing, litter and the potential impact of noise and disturbance, for example through the establishment of an Entertainment Management Zone.</li> <li>▪ Detail will be provided in the Development Management DPD.</li> </ul>

Section/ Topic/ Core Policy	Summary of main issues	Outcome/ Relevant section CP in the Pre-Submission Report
	Wording suggested by the LVRPA: <ul style="list-style-type: none"> <li>▪ “The Council will seek to protect, promote and encourage the use of leisure and cultural facilities in the Borough by...supporting the Lee Valley Regional Park Authority Proposals and other partners in their efforts to increase the range, quality and access to leisure and amenity provision within the Lee Valley Regional Park available to Enfield residents”.</li> <li>▪ Supporting text should also refer to the strategic importance of Pickett’s Lock</li> </ul>	Policy has been amended (see CP11 and CP12).
	It was suggested that additional policies should:	
	There is an opportunity available to create a visitor destination on the waterside at Ponders End (BW).	<i>CP42: Ponders End</i> seeks to create a new mixed use, employment, leisure and residential community at Ponders End Waterfront, including sites at the southern end of Brimsdown and Columbia Wharf, helping to reconnect the community with its waterfront and contributing to the chain of attractions along the LVRP.
	Policy should be reviewed against revised London Plan Policy 3D.7 and amended as necessary to ensure that the Pre-Submission Report is in general conformity. In particular, a bullet point should be added stating that Council will support an increase in the quality and quantity of fully wheelchair accessible accommodation in light of integrated strategic and local assessments (GLA).	Policy is in general conformity with the revised London Plan Policy 3D.7.  CP12 seeks to improve and promote wheelchair access to visitor accommodation and tourist attractions, which will also provide better access to facilities for families, children and older people.

## Chapter 9 - Travel and Movement

Section/ Topic/ Core Policy	Summary of main issues	Outcome/ Relevant section/CP in the Pre-Submission Report
Travel and Movement	There was general support for the principles in this section. However, concerns raised were: <ul style="list-style-type: none"> <li>▪ A lack of detail regarding car-parking standards.</li> <li>▪ In particular, the GLA and partners emphasised car parking standards should be applied in accordance with Annex 4 of the London Plan.</li> <li>▪ Concerned that potential transport impacts of the Spatial Strategy and proposed growth have not been evaluated (HA).</li> </ul>	<ul style="list-style-type: none"> <li>▪ Car parking standards will be set in accordance with the London Plan and detailed in the Development Management DPD.</li> <li>▪ A Transport Assessment was not available at preferred options stage. However, the Enfield Core Strategy Transport Assessment has informed the Pre-Submission Report.</li> </ul>
	This section needs to make reference to: <ul style="list-style-type: none"> <li>▪ Parking standards.</li> </ul>	Details such as these will be provided in the Development Management DPD.

Section/ Topic/ Core Policy	Summary of main issues	Outcome/ Relevant section/CP in the Pre-Submission Report
	<ul style="list-style-type: none"> <li>▪ Criteria for car free development.</li> <li>▪ Criteria for car reduced development and car clubs.</li> <li>▪ Cycle parking standards and delivery and servicing strategies.</li> <li>▪ Pooling of s106 contributions for transport.</li> </ul>	
<p><b>CP28:</b> Location and Phasing of New Development</p>	<p>There was general support for the principles in this policy. Particularly, support was expressed concerning:</p> <ul style="list-style-type: none"> <li>▪ Growth being phased until transport needs can be met (GLA, Enterprise Enfield and National Grid Holdings).</li> <li>▪ Large trip generating uses in town centres (Fairview New Homes, GLA).</li> <li>▪ Pooling of contributions, travel demand management, transport statements and travel plans (TfL).</li> </ul>	
<p><u>The policy in this form has been deleted, but comments still addressed below in relation to the Pre-Submission Report.</u></p> <p>The appropriate location and phasing of development is considered to be an implicit objective of the Spatial Strategy. Further detail is provided within Core Policies for Housing, Economic Development and Strategic Growth Areas within the Pre-Submission Report. The four emerging AAPs and the Infrastructure Delivery Plan further discuss the requirements for and phasing of necessary infrastructure.</p>		
	<p>Concerns raised were:</p> <ul style="list-style-type: none"> <li>▪ That the policy places too much emphasis on private transport and road schemes rather than improving bus links.</li> <li>▪ Policy must be flexible enough to allow developments which may not fall into any subsequently defined phasing plan but which bring them key regeneration and other benefits (National Grid Property Holdings).</li> </ul>	<p>Developments are assessed on a site-by-site basis. Council requires transport assessments with major developments to identify opportunities for public transport improvements (<i>CP26 – Public Transport</i>). Major developments will be utilised as a catalyst and delivery mechanism to provide public transport accessibility improvements through new infrastructure and services.</p>
	<p>The following inaccuracies were highlighted:</p> <ul style="list-style-type: none"> <li>▪ The supporting text is wrong in stating 'Traffic growth in is rising by 1.6% per annum', it is about one third of this level (GLA).</li> </ul>	<p>Enfield's LIP notes 'over the last 30 years, weekday traffic growth in the Borough has been at an equivalent compound growth rate of the order of 1.6% per annum. This contrasts with corresponding figures of 0.55% in Greater London and about 3% in Great Britain'. Text not included within Pre-Submission Report.</p>
	<p>This section needs to make reference to:</p>	
	<p>Opportunities for public transport improvements should be considered and included in development proposals, demonstrated in transport assessment and also included in s106 agreements (GLA).</p>	<p><i>CP26 – Public Transport</i> requires applications to be accompanied by Transport Assessments to demonstrate that existing or proposed public transport levels can accommodate development proposals, including, where appropriate, opportunities for public transport improvements.</p>
	<p>Improved local rail services and better access to the rail stations is critical to achievement of policy.</p>	<p>Noted in <i>CP26 – Public Transport</i>.</p>

Section/ Topic/ Core Policy	Summary of main issues	Outcome/ Relevant section/CP in the Pre-Submission Report
	<ul style="list-style-type: none"> <li>▪ Using s106 to invest in increased transport capacity, rather than simply using them to mitigate the impact of development so that change in capacity after development is neutral (Network Rail) (NR).</li> <li>▪ Pooling of contributions should be amended to be identify as delivery mechanism (Network Rail)</li> </ul>	Developer contributions are addressed in <i>CP46 – Planning Obligations</i> . Transport improvements are included within the list of provisions to be considered in obligations. Further detail will be provided in the Development Management DPD. The IDP identifies existing and future transport needs.
	Consideration should be given to stressing the importance of information, behaviour/lifestyle or travel demand management measures, as well as to existing and new infrastructure	Included in <i>CP24 – Road Network</i> . Requirements for travel plans, car clubs and car share to be provided in Development Management DPD.
<b>CP29:</b> Promoting sustainable Transport Choices and Improving Access for People with Restricted Mobility	There was general support for the principles in this policy. Particular support was expressed concerning: <ul style="list-style-type: none"> <li>▪ Improvements to the public realm</li> <li>▪ Implementation of maximum parking standards</li> <li>▪ Promotion of car clubs and car-share schemes.</li> </ul>	
<p><u>The policy in this form has been deleted, but comments still addressed below in relation to the Pre-Submission Report.</u></p> <p>Much of the policy was considered to be a repeat of regional and national policy. Behaviour Change Programmes and Travel Demand Management are included within <i>CP24 – Road Network</i>, public realm improvements are noted within all policies, car and cycling parking standards will be detailed in the Development Management DPD.</p>		
	Concerns raised were: <ul style="list-style-type: none"> <li>▪ The promotion of cycling lanes on busy roads (Enterprise Enfield).</li> <li>▪ Much of this document restates national and regional guidance and is unnecessary without any additional local dimension (GLA).</li> <li>▪ TfL objects to the content and format of the policy as both are inconsistent with the London Plan.</li> </ul>	<ul style="list-style-type: none"> <li>▪ The Pre-Submission Report does not reference on-road cycle lanes. However, <i>CP25 – Pedestrians and Cyclists</i> refers to improving cycle access across the Borough.</li> <li>▪ Policy deleted and, where necessary, incorporated into remaining policies. The entire Pre-Submission Report has been reviewed for consistency with national and regional guidance and not to repeat such guidance.</li> </ul>
	This section needs to make reference to: <ul style="list-style-type: none"> <li>▪ Pro-active commitment to the development of safe routes and facilities for cyclists and pedestrians (Enfield HAF).</li> <li>▪ Promotion of waterborne freight and passenger transport (BW).</li> <li>▪ To ensure maximum uptake of car club and car share schemes, it is recommended that clear guidance is provided when such schemes will be required (HA).</li> </ul>	<ul style="list-style-type: none"> <li>▪ Addressed in <i>CP25 – Pedestrians and Cyclists</i>.</li> <li>▪ Referenced in <i>CP27 – Freight</i>.</li> <li>▪ Guidance on requirements for car club and car share will be provided in the Development Management DPD.</li> </ul>

Section/ Topic/ Core Policy	Summary of main issues	Outcome/ Relevant section/CP in the Pre-Submission Report
<b>CP30:</b> Cross Cutting Infrastructure Improvements	There was general support for the principles in this policy.	
	Concerns raised were:	
	LB Haringey and TfL noted that the Northern Gateway Access Package (NGAP) should not encourage more use of the car for commuting.	Noted in <i>CP24: The Road Network</i> . Council will work with partners to continue to consider the potential merits, benefits and impacts of a NGAP to improve accessibility and movements within NEE and to support existing and new businesses in the ULV.
	TfL welcomes the rejection of the NGAR, however, notes that all reference to the previous schemes should be removed.	All reference to NGAR has been removed.
	TfL objects to reference to using highway improvements when there should be greater emphasis on public transport improvements (GLA).	Highways improvements are assessed based on their benefit to all modes as noted in <i>CP24: The Road Network</i> .
	This section needs to make reference to: <ul style="list-style-type: none"> <li>▪ The role of public transport in supporting deprived communities, in regeneration and in promoting London's role as a world class city (GLA).</li> </ul>	All transport improvements noted within the Core Strategy and supporting documents have been identified as required to support the Spatial Strategy or overcome existing accessibility deficits. Key objectives of the Spatial Strategy are to revitalise areas of multiple deprivation and promote economic growth.
<b>CP31:</b> Walking and Cycling	There was general support for the principles in this policy. Particularly support was expressed concerning: <ul style="list-style-type: none"> <li>▪ The development of high quality walking and cycling routes.</li> </ul>	
	This section needs to make reference to:	
	The policy should explicitly mention the Council's intention to work with British Waterways and Lee Valley Regional Park to improve the condition of the towpath along the River Lee Navigation, particularly through seeking planning obligations to secure financial contributions towards improvements or works in kind.	Included within the implementation of <i>CP25 – Pedestrians and Cyclists</i> . Considered to be an element of the 'Enfield Walking Action Plan'.
	S106 contributions and travel plans should be used to deliver improvements to walking and cycling networks.	Developer contributions are addressed in <i>CP46 – Planning Obligations</i> . Transport improvements are included within the list of provisions to be considered in obligations. Further detail will be provided in the Development Management DPD. The IDP identifies existing and future transport needs.

Section/ Topic/ Core Policy	Summary of main issues	Outcome/ Relevant section/CP in the Pre-Submission Report
<b>CP32:</b> Public Transport	There was general support for the principles in this policy. Particularly for: <ul style="list-style-type: none"> <li>▪ Proposals to improve public transport in the ULV.</li> </ul>	
	This section needs to make reference to: <ul style="list-style-type: none"> <li>▪ Environmental improvements as well as safety improvements at railway stations.</li> <li>▪ Needs to address the destination objective – e.g. hospitals, leisure, retail and employment locations.</li> </ul>	Noted in <i>CP26 – Public Transport</i> .
<b>CP33:</b> Road Network	There was general support for the principles in this policy. Particularly for ; <ul style="list-style-type: none"> <li>▪ The council's rejection of NGAR (LVRPA).</li> </ul>	
	Concerns raised were: <ul style="list-style-type: none"> <li>▪ Objects to the wording of this policy. Public transport improvements should be promoted as a way of easing road traffic congestion (TfL).</li> </ul>	The Council promotes public transport improvements as noted in <i>CP26 – Public Transport</i> , however, a functioning highway network is necessary all efficient movement of all modes.
	This section needs to make reference to:	
	Clarify whether Council has intention to pursue NGAP (LVRPA)	Noted in <i>CP24: The Road Network</i> . Council will work with partners to continue to consider the potential merits, benefits and impacts of a NGAP to improve accessibility and movements within NEE and to support existing and new businesses in the ULV.
	Does not support improvements to NC that would result in significant additional road traffic capacity (LB Waltham Forest).	Transport Assessments identify the A406 as a priority corridor for investment. Council believes that capacity improvements are required to address existing constraints.
	Reference to the Council's agreement, through its LIP to aim to ensure road traffic growth is reduced.	Included in <i>CP24: The Road Network</i> .
<b>CP34:</b> Freight	There was general support for the principles in this policy.	
	This section needs to make reference to: <ul style="list-style-type: none"> <li>▪ The opportunity to achieve a major waste processing/recycling facility using rail and water-borne movement of freight (Enfield HAF).</li> <li>▪ Need to identify and safeguard sites for freight movements.</li> </ul>	<ul style="list-style-type: none"> <li>▪ <i>CP27 – Freight</i> sees the safeguarding of wharves at Picketts Lock and London Waste Ecopark.</li> <li>▪ Locations for wharves identified. Further work on rail freight required.</li> </ul>

## Chapter 10 - Area Strategies for Growth and Change

Section/ Topic/ Core Policy	Summary of main issues	Outcome/ Relevant section CP in the Pre-Submission Report
<b>General</b>	<p>There was general support for the principles in this section. In particular, support was expressed concerning:</p> <ul style="list-style-type: none"> <li>▪ Welcomes development of AAPs for CL and NEE and their reference to the new vision for the ULV (NLSA).</li> <li>▪ The identification of CL, NEE, ET and the NC Road as foci for growth and change is generally supported (GLA).</li> </ul>	
	Concerns raised were:	
	Need to acknowledge that three of the AAPs (CL, NEE and the NC) are located in areas at high risk of flooding in accordance with Enfield's SFRA (EA).	<p><i>CP28: Managing Flood Risk through Development</i> states that the Council will take a risk-based approach to development and flood risk, directing development to areas of lowest risk, in accordance with PPS25. However, in the development of sites in the CL and NEE AAP areas that lie within flood zones 2 and 3a, but that contribute to the strategic objectives for change in the ULV will be supported in principle. These schemes will be expected to comprehensively address flood risk, mitigating the impacts of the development and reducing flood risk overall.</p>
	All AAPs, not just Enfield Town, must demonstrate clearly and robustly that the Borough's heritage assets, their settings and the wider historic environment is sufficiently identified and valued, and given due care and consideration when developing policies and proposals for change (EA).	<p><i>CP31: Built and Landscape Heritage</i> states that the Council will implement national and regional policies and work with partners (including land owners, agencies, public organisations and the community) to pro-actively preserve and enhance all of the Borough's heritage assets</p> <p>Enfield's Heritage Strategy 2008 will continue to be used to inform the development of all four AAPs.</p>
	It is essential that policies for CL and NEE are developed in the context of the ULVOAPF (GLA).	<p>The Pre-Submission Report recognises the need to ensure that policies for CL and NEE are developed in the context of the emerging ULVOAP. Growth in the ULV will be in accordance with its designation under the London Plan as an Area of Opportunity and will help deliver the aims of the North London Strategic Alliance's vision as North London's Waterside (see <i>SO1: Enabling and Focusing Change</i> for further detail).</p> <p>Detail will be provided in the AAPs for CL and NEE.</p>
<b>10.1:</b> Introduction	<p>There was general support for the principles in this section. In particular, support was expressed concerning:</p> <ul style="list-style-type: none"> <li>▪ The objectives to improve various characteristics of the NEE area (Kier Property Developments Ltd and the Ponders End Trust).</li> </ul>	

Section/ Topic/ Core Policy	Summary of main issues	Outcome/ Relevant section CP in the Pre-Submission Report
	<ul style="list-style-type: none"> <li>▪ The development of area strategies for those parts of Enfield where significant growth or change is proposed is supported (GL Hearn and Hadley Homes).</li> </ul>	
	<p>Concerns raised were:</p> <ul style="list-style-type: none"> <li>▪ The precise delineation of the AAPs as identified at Figure 10.1 presupposes the separate consultation that is taking place on the various AAPs.</li> </ul>	<p>Para. 10.1.1, Preferred Options Report states the report provides the context for the preparation of detailed AAPs for each of these broad locations, but that it would be for the AAPs to deliver definitive projects, proposals or courses of action. Delineation of the AAP areas will be refined as part of the AAP consultation process.</p>
<p><b>10.2:</b> The Upper Lea Valley</p>	<p>There was general support for the principles in this section. In particular, support was expressed concerning:</p> <ul style="list-style-type: none"> <li>▪ The strategic objectives, particularly the need to improve the environment, infrastructure and economic and social well being of NEE and CL (TW).</li> <li>▪ The preferred option for the CL Area to create a sustainable community by consolidating its commercial role, developing new employment opportunities and encouraging mixed (GL Hearn for Tesco Stores Ltd).</li> </ul>	
	<p>It was suggested that additional policies should:</p> <ul style="list-style-type: none"> <li>▪ Paragraph 10.2.4-10.2.10 - the long term phasing of development requires an understanding of the relationship between transport and land use including improvements to public transport links. Areas identified for development would require a significant increase in public transport access and other sustainable modes. A comprehensive and integrated transport strategy needs to be developed and this should be made clear in the preferred area strategy (GLA).</li> </ul>	<p>The Council has undertaken a Transport Assessment for the Core Strategy, which has been used to inform policies relating to the areas of growth. The Council will also work with other North London boroughs, TfL and partners to commission a strategic transport assessment for the ULV. It is intended the study will use dynamic modelling tools to undertake more detailed assessments of the impact of developments across a broader geographical scale (see Section the Transport sections 7.5-7.8 of the Core Strategy Pre-Submission Report for further detail).</p>
<p><b>Central Leaside</b></p>	<p>There was general support for the principles in this section. In particular, support was expressed concerning:</p> <ul style="list-style-type: none"> <li>▪ Support the Council's vision of a 'Central Leaside to be an exemplar eco community respecting its environmental constraints and maximizing opportunities for new communities and waterside living.' (NE).</li> <li>▪ Supports the Preferred Option for CL (GVA Grimley for La Salle Investment Management).</li> </ul>	

Section/ Topic/ Core Policy	Summary of main issues	Outcome/ Relevant section CP in the Pre-Submission Report
	<p>This section needs to make reference to:</p> <ul style="list-style-type: none"> <li>▪ The area covered by the CL AAP should show a clear relationship with Edmonton Green which will be considerably affected should the area become a site for significant mixed use development (NLSA).</li> </ul>	<p><i>CP39: Edmonton</i> recognises this area, with Edmonton Green at its heart, as a place shaping priority area. Building on current partnership work addressing place shaping in south east Enfield, proposals are under development to consider coordinating more closely the two place shaping priority areas of Edmonton and Meridian Water to maximise the effectiveness and coverage of place shaping activity.</p>
	<p>It was suggested that additional policies should:</p> <ul style="list-style-type: none"> <li>▪ State that retail development will be acceptable at CL as part of the transformation of the area into a series of vibrant and sustainable communities. Such development will need to satisfy the tests of PPS6 including enhanced public transport accessibility (RPS).</li> </ul>	<p><i>CP38: Meridian Water</i> states that approximately 80% of the area should comprise a mix of residential, retail, community uses and open spaces, with 20% of the area (no less than 5.5ha) as revitalised employment uses, integrated into the wider development.</p> <p><i>CP17: Town Centres</i> proposes a new Local Centre for Meridian Water to cater for the day to day needs of the new local community that is to be established there.</p>
<b>North East Enfield</b>	<p>There was general support for the principles in this section. In particular, support was expressed concerning:</p> <ul style="list-style-type: none"> <li>▪ Support opportunities for mixed use (employment, commercial and leisure) development at Ponders End Pumping Station site (TW).</li> <li>▪ Support the Council's identification of NEE as an area justifying a particular planning approach and agrees with the Council's interpretation of the characteristics of the area (Kier Property Developments).</li> </ul>	
	<p>Concerns raised were:</p> <ul style="list-style-type: none"> <li>▪ The proposed NGAP should not encourage more use of the car for commuting. The evaluation of the package should assess the impact on Haringey roads particularly in the Tottenham area. The Council would not support a package of measures which could encourage more car travel into and through the Borough (LB of Haringey).</li> </ul>	<p><i>CP24: The Road Network</i> states the Council will work with partners to continue to consider the potential merits, benefits and impacts of a NGAP to improve accessibility and movements within NEE and to support existing and new businesses in the ULV.</p> <p>Enfield's Core Strategy Transport Assessment considers the potential effect of the planned growth in the Borough to 2026. It concludes that the limited scale of the additional congestion caused by the projected trips due to proposed development in Enfield indicates that that the NGAP scheme is not required to deliver the planned growth in Enfield alone and should be considered in the context of growth in North London as a whole. The Council will work with other North London boroughs, Transport for London and partners to commission a strategic transport assessment for the ULV (see <i>CP24: The Road Network</i>).</p>

Section/ Topic/ Core Policy	Summary of main issues	Outcome/ Relevant section CP in the Pre-Submission Report
	<p>In line with other Core Strategy objectives, Kier Property Developments encourage the incorporation within this Preferred Option of the following:</p> <ul style="list-style-type: none"> <li>▪ Recognition of Ponders End as having the potential for the creation of a new waterfront with opportunities for mixed use and leisure development, with better links to the station (paragraph 10.2.2).</li> <li>▪ Enhancement of east-west connections between the Lee Valley, the reservoirs and residential communities (paragraph 10.2.2).</li> <li>▪ Acceptance of mixed used developments on land currently solely used for employment (e.g. The Ponders End Industrial Estate) in order to effect the above and to achieve mixed and sustainable communities.</li> <li>▪ Reintegration of the various land use aspects of the NEE area to achieve a more mixed and sustainable urban form.</li> </ul>	<p><i>CP41: Ponders End</i> proposes a new mixed use, employment, leisure and residential community at Ponders End Waterfront of exceptional quality, including sites at the southern end of Brimsdown and Columbia Wharf, helping to reconnect the Ponders End community with its waterfront and contributing to the chain of attractions along the LVRP.</p> <p>Detail will be provided in the Ponders End Framework for Change and NEE AAP. As part of the Framework for Change three planning briefs, providing detailed masterplans are being developed – one of these will be for the Ponders End Waterfront.</p>
	<p>The following wording should be added to the end of the first paragraph of the Preferred Option for NEE: ...We want to explore the opportunities for waterside development and the benefits for leisure and recreation so close to the regional park. We want to assist in securing the redevelopment of key opportunity sites in close proximity to Ponders End Station and view the removal of the gas holders at Woodall Road/Falcon Road as the catalyst for securing high quality residential development, regeneration objectives and public realm improvements. (National Grid Property Holdings).</p>	<p><i>CP40: North East Enfield</i> seeks to create a pedestrian-oriented community hub at Ponders End South Street Campus (which includes the National Grid gas holders site at Woodall Road/Falcon Road), 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 LVRP.</p> <p>Detail will be provided in the Ponders End Framework for Change and NEE AAP. As part of the Framework for Change three planning briefs, providing detailed masterplans are being developed – one of these will be for the Ponders End South Street Campus area.</p>
<p><b>10.3:</b> Enfield Town</p>	<p>There was general support for the principles in this section. In particular, support was expressed for:</p> <ul style="list-style-type: none"> <li>▪ The general vision for ET and the focus on the eastern end of the town centre (Planning Works Ltd).</li> </ul>	
	<p>This section needs to make reference to:</p>	
	<ul style="list-style-type: none"> <li>▪ Paragraph 10.3: Wording should acknowledge that any changes in provision of bus infrastructure needs to be agreed with TfL, and that land which currently supports the provision of bus network should not be lost to other uses, unless alternative and suitable sites can be made available (GLA).</li> </ul>	<p>The Council is working closely with partners, including TfL and London Buses, to provide more detail on possible public transport improvements in the strategic growth areas. This includes an improved interchange at ET station, potentially incorporating a relocated bus station from Little Park Gardens (see CP26: Public Transport and CP43: <i>The Area around the Enfield Town Station</i> for detail).</p>

Section/ Topic/ Core Policy	Summary of main issues	Outcome/ Relevant section CP in the Pre-Submission Report
	<ul style="list-style-type: none"> <li>▪ CP10 refers to town centres as a location for new residential development and this should be reflected and reinforced here. (Planning Works Ltd).</li> <li>▪ Supports the strategy of retaining and developing Enfield Town's role as a lively major town centre but the preferred option fails to sufficiently emphasise the need for additional residential development within the town centre to improve vitality and viability and the evening economy. Not in accordance with PPS1 and PPS6 (Fairview New Homes).</li> </ul>	<p><i>CP43: The Area Around Enfield Town Station</i> seeks to create a retail-led mixed use development, accommodating approximately 10,000sq m of retail floorspace, up to 500 new homes, community uses and health care, and a new primary school, if required.</p> <p>Detail will be provided in the ET AAP.</p>
	<p>It was suggested that additional policies should:</p>	
	<p>Town centres are the heart of communities and an expression of their culture and identity. As well as shops they should provide a range of functions such as leisure, recreation and culture. The Core Strategy should contain a policy to introduce a strategy for ET centre (Theatres Trust).</p>	<p><i>CP17: Town Centres</i> seeks to strengthen the role of Enfield's town centres by focusing new commercial, retail, leisure, office and other related uses within the centres. The Major Centre of ET will continue to be supported as the main destination for comparison goods shopping, and also the main centre for leisure, entertainment and cultural activities, as well as office uses.</p> <p>Detail will be provided in the ET AAP.</p>
	<p>In relation to the coordinated approach, this should not be at the expense of individual developments which in themselves make a significant contribution to regeneration and can often act as a catalyst for further development. The danger of promoting such significant change over a wide area that development is discouraged should be avoided (Planning Works Ltd).</p>	<p>The Council recognises that new development cannot be put on hold while the LDF documents are being developed and finalised. Planning applications for new developments in ET have and will continue to be, assessed on their merit in accordance with existing saved UDP policies, the London Plan and in context of the emerging AAP and Core Strategy policies.</p>
<p><b>10.4:</b> The North Circular Area</p>	<p>There was general support for the principles in this section. In particular, support was expressed concerning:</p> <ul style="list-style-type: none"> <li>▪ The proposed TfL Safety and Environmental Scheme for improvements to the A406 between Green Lanes and Bounds Green (LB Waltham Forest).</li> <li>▪ The preferred option, with particular reference to Enfield Gateway. National Grid land at New Southgate is well placed to contribute to these objectives. (National Grid Property Holdings).</li> </ul>	
	<p>Concerns raised were:</p>	
	<p>Would not support further improvements beyond the TfL scheme (mentioned above), if these involved</p>	<p>The Council will be investigating the potential benefits and impacts of further improvements to the A406 NC Road,</p>

Section/ Topic/ Core Policy	Summary of main issues	Outcome/ Relevant section CP in the Pre-Submission Report
	significant additional road traffic capacity (LB Waltham Forest).	beyond those proposed by TfL. Detail will be provided in the NC AAP.
	<ul style="list-style-type: none"> <li>▪ Paragraph 10.4.1: The text in this paragraph should clearly recognise that the TfL improvement scheme is to improve sustainability and road safety.</li> <li>▪ Needs to accurately acknowledge the role of the TfL improvement scheme and the need to work closely with TfL as the major stakeholder in this area.</li> <li>▪ It should be made clear in the area strategy that work on the NC must be worked up in partnership with TfL.</li> <li>▪ Suggest rewording the relevant part of this paragraph as follows:                      "Transport for London is working with the Borough to improve both the A10 and A406, especially in terms of road safety, cycling, urban environment, bus stops and bus priority and to reduce (GLA).congestion."(GLA)</li> </ul>	<p>TfL's current road scheme will deliver environmental improvements to the area, however, it is recognised that the scheme will not address many of the concerns expressed by local people and the Council, particularly a reduction in traffic congestion.</p> <p>The NC AAP provides an opportunity for the Council and local community to look forward beyond the improvements currently planned and the Council has agreed with TfL that the possibility of future improvements to increase capacity should not be ruled out.</p> <p>Detail will be provided in the NC AAP.</p>

### Chapter 11 - Place Shaping-Delivering the Plan: the implementation and monitoring framework.

Section/ Topic/ Core Policy	Summary of main issues	Outcome/ Relevant section CP in the Pre-Submission Report
Working in Partnership	There was general support for the principles in this section.	
Implementation Process	<p>This section needs to make reference to:</p> <ul style="list-style-type: none"> <li>▪ A list of sustainable transport improvements required to mitigate the impacts of the Plan and associated funding sources for delivery (HA).</li> <li>▪ The London Plan priorities for planning obligations and the need to meet the needs of small and medium enterprises (GLA).</li> </ul>	<ul style="list-style-type: none"> <li>▪ <i>CP46: Infrastructure Contributions</i> addresses funding sources and there is a summary table included in Chapter 10 of the Pre-Submission Report, and detail provided in the IDP.</li> <li>▪ CP46 both refers to London Plan Policy 6A.4 (Priorities in Planning Obligations) and, business and employment initiatives, including small and medium enterprises as benefiting from planning obligations.</li> </ul>

Section/ Topic/ Core Policy	Summary of main issues	Outcome/ Relevant section CP in the Pre-Submission Report
<p><b>Core Policy 35:</b>                      Planning Obligations:                      General Policy Considerations</p>	<p>There was general support for the principles in this policy. Particular support was expressed concerning:</p> <ul style="list-style-type: none"> <li>▪ The inclusion of cultural initiatives (Theatres Trust).</li> <li>▪ The inclusion of fire and emergency services as community facilities (Drivers Jonas for LFEPA).</li> <li>▪ The inclusion of the built heritage as a recipient of planning obligations (EA).</li> <li>▪ The inclusion of open space, recreation, landscape, biodiversity, geodiversity, and pedestrian and cycle access (LVRPA).</li> </ul>	
	<p>Concerns raised were with the need to reference the ULV and the provision of infrastructure (NLSA).</p>	<p>Reference made to place shaping priority areas at CL and Ponders End, and the IDP.</p>
	<p>The following inaccuracies were highlighted:</p>	
	<p>Childcare provision should read accessible and affordable childcare provision (GLA).</p>	<p>This has been amended in CP46.</p>
	<p>This section needs to make reference to:</p>	
	<p>Partnership working specifically with Haringey and Waltham Forest (NLSA).</p>	<p>Section 10.2: Delivery Mechanisms specifically makes reference to partnership working with both these boroughs.</p>
	<p>Fire and emergency services and the fact that developers should contribute to them under planning obligations (Drivers Jonas for LFEPA).</p>	<p>Fire and emergency services are specifically referred to in CP46.</p>
	<p>Green infrastructure and the protection and enhancement of biodiversity and geodiversity (NE).</p>	<p>CP46 specifically refers to green infrastructure and biodiversity and geodiversity protection.</p>
	<p>Individual site circumstances and the London Plan highest priorities of affordable housing and public transport (GLA).</p>	<p>Determination of planning obligations on a site by site basis is included in CP46, with housing and public transport identified as the highest priorities.</p>
	<p>Sites which give rise to abnormal costs and it may be necessary to prioritise the provisions sought (First Plan for National Grid Property Holdings).</p>	<p>Last paragraph of CP46 specifically refers to abnormal costs arising and CP46 prioritises the provisions sought.</p>
	<p>Policing facilities should be included as infrastructure that will be considered in obligations (MPA).</p>	<p>CP46 specifically identifies policing facilities as a provision to be considered.</p>
	<p>Development finances should only be examined when the applicants cannot fund the requested obligations on the grounds of commercial viability (Planning Potential for Kier Property</p>	<p>Core Policy 46 specifically states this, in the final paragraph, 'If applicants cannot fund the requested obligations on the grounds of commercial viability, the Council will expect an open book approach to be taken in</p>

Section/ Topic/ Core Policy	Summary of main issues	Outcome/ Relevant section CP in the Pre-Submission Report
	Developments & The Ponders End Trust).	examining the development finances of proposals being considered.'
	GLA's affordable housing toolkit should be used in calculating obligations related to affordable housing (HBF).	CP46 specifically states that the GLA's affordable housing toolkit will be used to calculate the viability of providing obligations in relation to affordable housing.
Other	A planning obligations SPD should be put in place to give developers more certainty as to Council's approach, including to cumulative impacts of development (HA, First Plan for National Grid Property Holdings).	The revised LDS 2009-2012 identifies a planning obligations and CIL Interim SPD programmed to be delivered in mid-2010.

## Appendix 2 - Illustrative Maps

Section/ Topic/ Core Policy	Summary of main issues	Outcome/ Relevant section/ CP in the Pre-Submission Report
Hadley Wood	Concerns raised were: <ul style="list-style-type: none"> <li>▪ Placing of Hadley Wood in Enfield rather than Barnet Borough.</li> <li>▪ Recognition of the need for greater resources to be allocated to disadvantaged parts of the Borough.</li> <li>▪ Concentration of resources in disadvantaged parts of the Borough should not preclude addressing of issues on Hadley Wood, particularly transport (Coombehurst Close Residents Association).</li> </ul>	<ul style="list-style-type: none"> <li>▪ LDF process does not provide a mechanism for changing of Borough boundaries – this needs to be pursued outside of the LDF process.</li> <li>▪ The maps show the spatial patterns of designations which reflect planning policies. These policies are articulated in the main body of the report. Comments on specific policy proposals and their implications are dealt with the relevant parts of this statement.</li> <li>▪ The transport issues in Hadley Wood are not articulated in the Pre-Submission Report. The Pre-Submission Report covers the entire Borough and while the emphasis is on regeneration of disadvantaged areas, this is not the detriment of other areas.</li> </ul>
District centres	Concerns raised were: <ul style="list-style-type: none"> <li>▪ Include the Morrisons supermarket in Palmers Green under a district centre designation (Peacock &amp; Smith on behalf of Morrisons).</li> </ul>	This site is proposed to be included in the area under the Palmers Green district centre designation.
Retail parks	Concerns raised were: <ul style="list-style-type: none"> <li>▪ Include the Morrisons supermarket at Southbury &amp; Great Cambridge Roads into an area designated as a retail (Peacock &amp; Smith on behalf of Morrisons).</li> </ul>	The changes to the designations propose this area as a retail park. See responses to the representation on Chapter 8 regarding potential expansion of this store.
Areas of archaeological importance & Schedule of ancient monuments	Concerns raised were: <ul style="list-style-type: none"> <li>▪ These should be shown on the proposals map (EH).</li> </ul>	As these are designated by EH under national legislation, rather than by local councils, it is not appropriate to include them on a map which sets out a council's planning controls. Allied to this is the issue of retaining legibility of paper copy maps with the addition of extra information. However, the Council is investigating the practicability of including additional data for information purposes on the digital version of the designation maps, which would be available on-line.

<b>Section/ Topic/ Core Policy</b>	<b>Summary of main issues</b>	<b>Outcome/ Relevant section/ CP in the Pre-Submission Report</b>
Greenbelt boundaries	<p>Concerns raised were:</p> <ul style="list-style-type: none"> <li>▪ The core strategy should include a detailed review of the boundaries of the green belt, in order to provide additional development opportunities (Planning Potential for Diocese of London and TW).</li> <li>▪ Hadley Wood Golf Club objects to the land use designation club (as defined in the current UDP) and recommends that the detailed green belt boundary be revised to exclude the land.</li> </ul>	<ul style="list-style-type: none"> <li>▪ The purpose of the core strategy is to set broad policy directions. In broad terms, green belt boundaries are not envisaged as changing, other than in recognition of the redevelopment of the former small arms factory in Enfield Lock for housing, and to correct previous cartographical errors. Beyond this, individual proposals for changes to the boundary will be tested against the objectives for the green belt and general planning considerations as set out in the core strategy, as required by PPG2 and the London Plan.</li> <li>▪ Whilst it was stated in the Preferred Options report that local representations regarding the green belt boundary would be considered in the production of the Proposals Map to accompany the Pre-Submission Report, it is now considered that the appropriate place to undertake any such changes is in the Development Management DPD.</li> <li>▪ It should also be noted that the Illustrative map accompanying the Preferred Options report appears to show a number of slight changes to the green belt boundary, but these changes are cartographic only, merely reflecting a newer map base which is more accurate than that available for the UDP in 1994; the actual boundaries on the ground have not changed.</li> </ul>
Designation of industrial sites	<p>Concerns raised were:</p> <ul style="list-style-type: none"> <li>▪ Amend map to include a note stating that the boundary of the CL SEL is subject to the managed release of unproductive or inefficient employment sites GVA Grimley for La Salle Investment Management.</li> </ul>	<p>Changes to the SEL (now SIL) have been with the agreement of the GLA and Council is awaiting formal agreement from the GLA. The de-designation of sites will occur when the Core Strategy and proposals map are adopted.</p>
Inclusion of designation maps in core strategy	<p>Concerns raised were:</p> <ul style="list-style-type: none"> <li>▪ Objects to the inclusion of illustrative maps showing specific land allocations within the Core Strategy (Fairview Homes) .</li> </ul>	<p>The maps included in the Preferred Options report and those that will be included in the Pre-Submission Report show only the main designations for the Borough and are not site allocation maps. There will be a later separate site allocations DPD.</p>

## Summary of responses to the Strategic Growth Areas Report

### Section 2: Central Leaside including Meridian Water

Section/ Topic/ Core Policy	Summary of main issues	Outcome/ Relevant section CP in the Pre-Submission Report
<p><b>2:</b> Central Leaside including Meridian Water</p>	<p>There was general support for the principles in this section. Particularly support was expressed concerning:</p> <ul style="list-style-type: none"> <li>▪ Broad agreement for the general approach (BW).</li> <li>▪ The identification of CL as the focus for growth and change. It reflects the broad approach being taken in the draft Opportunity Area Planning Framework (GLA).</li> </ul> <p>GVA Grimley for La Salle Investment Management supports:</p> <ul style="list-style-type: none"> <li>▪ The designation of the CL growth area and agreement that a mix of uses should be encouraged.</li> <li>▪ Improving accessibility to and across the area, and proposals to overcome the severance caused by Angel Road and east-west links to the LVRP.</li> <li>▪ The 4 tracking proposals and refurbishment of Angel Road Station.</li> <li>▪ Higher density development in appropriate locations, using a design-led approach.</li> </ul> <p>Tribal MJ for SEGRO Plc supports:</p> <ul style="list-style-type: none"> <li>▪ The identification of CL as a priority area, with major opportunities for change and investment.</li> <li>▪ Greater flexibility of uses on existing employment sites in accordance with the needs to diversify the economy and encourage enterprise, thereby enhancing employment opportunities for local people.</li> <li>▪ Greater flexibility and the promotion of mixed uses to enable sui generis uses and vehicle-related operations to be located with the NC road corridor.</li> </ul> <p>Sita UK supports:</p> <ul style="list-style-type: none"> <li>▪ The recognition that CL contains some key public facilities, which provide essential services to North London, including the Edmonton Eco Park, and that the area will continue to play a key role in the management of North London's waste.</li> <li>▪ The aspirations for the waterways.</li> </ul> <p>Savills for Tottenham Hotspur Football Club supports:</p> <ul style="list-style-type: none"> <li>▪ The recognition of the potential of the CL area to accommodate significant new development for housing and employment, and that development in the area can</li> </ul>	

Section/ Topic/ Core Policy	Summary of main issues	Outcome/ Relevant section CP in the Pre-Submission Report
	<p>contribute to securing the strategic regeneration aims of central government and the Mayor of London in the longer term.</p>	
	<p>Concerns raised were:</p>	
	<p>Oppose the proposed location of housing in and around IKEA and Tesco, on the grounds that it will compromise the integrity of SIL in the ULV corridor. Instead, supports the location of new mixed-use development on land to the west side of the West Anglia Rail Line and east of the River Lee Navigation (existing location of the Harbet Road Industrial Estate) to better link with existing residential communities to the east and provide waterfront development opportunities (LB Harringey).</p>	<p>The policies for CL (CP37) and Meridian Water (CP38) maximise the area's strategic location within the London to Stansted, Cambridge and Peterborough growth corridor and its location within the ULVOA, as identified in the London Plan. It also pursues the NLSA's Vision for the ULV which identifies CL as a major opportunity area for change and investment.</p> <p>The Enfield Employment Land Study (2006) and the update to the Study (2009) support the retention and improvement of Eley, Montagu and Harbet Road estates, as well as acknowledging that the cluster of sites comprising Meridian Way, Glover Drive and Kimberley Road offer a significant development opportunity, thus supporting the focus for transformational change at Meridian Water. It should also be noted that a significant proportion of the land in CL promoted for mixed use development as part of Meridian Water is not currently designated as SIL - rather, it is presently in use for purposes other than industrial, predominantly retail use.</p>
	<p>Proposals for CL do not appear to identify or value the historic environment, and does not consider how the area has developed and its contribution to the character of the area (EH).</p>	<p><i>CP 31: Built and Landscape Heritage</i> seeks to implement national and regional policies by working with partners (landowners, agencies, public organisations and the community) to pro-actively preserve and enhance all of the Borough's heritage assets.</p> <p>This approach includes supporting appropriate initiatives which increase access to historic assets, provide learning opportunities and maximise their potential as heritage attractions.</p> <p>Detail to be provided in the CL AAP.</p>
	<ul style="list-style-type: none"> <li>▪ The area includes some inner source protection zones (SPZ). Use of deep piled foundations or ground source heat pumps may provide migration paths allowing shallow contamination to enter the deep chalk aquifer (EA).</li> <li>▪ A considerable amount of landfilling has taken place along the eastern banks of the River Lee. Suitable investigation/remediation actions will need to be taken for all redevelopment in the area to protect</li> </ul>	<p><i>CP 32: Pollution</i> states that the Council will work with partners, including the EA, to address risks arising from contaminated land, through land remediation so it is suitable for the proposed end use.</p> <p>Proposals on or in the vicinity of potentially contaminated land will be assessed according to criteria set out in the Development Management DPD. Where appropriate, land contamination assessments will be required to consider the effects of development.</p>

Section/ Topic/ Core Policy	Summary of main issues	Outcome/ Relevant section CP in the Pre-Submission Report
	<p>groundwater and surface waters (EA).</p> <ul style="list-style-type: none"> <li>▪ The proposed development at Meridian Water, and subsequent release of land off Argon Road for mixed-use development, is inconsistent with Enfield's Employment Land Study (Halcrow, 2006) (NLWA).</li> <li>▪ Concerned about the potential loss of SEL and PIA (LB Haringey).</li> </ul>	<p>The 2006 Enfield Employment Land Study* produced by consultants Halcrow recommends that any change/release of employment land should be strongly contested. However, comments provided by Halcrow in their 2006 report suggests that "the area is considered unsuitable for a change of planning use unless a significant "masterplan" can be drawn up..."</p> <p>The Council is currently working closely with the GLA to review all SIL designations in the Borough. Enfield's objective is to strengthen the role of those industrial sites in NEE and CL, which continue to meet the needs of modern industry. Much of the industrial land portfolio is busy, generally well-occupied, and continues to be strategically important for Enfield, the sub-region and London as a whole.</p> <p>Evidence suggests that there are a number of sites that are not currently occupied intensively for industry and are vacant or underused, such as land at Meridian Way, Glover Drive, Kimberly Road, and the southern parts of Brimsdown. These sites offer the potential for change to support urban regeneration within and around these areas that are currently experiencing high levels of deprivation.</p> <p>It should also be noted that a significant proportion of the land in CL promoted for mixed use development as part of Meridian Water, is not currently designated as SIL, rather it is in use for purposes other than industrial, predominantly retail use.</p> <p>The Council will be progressing a masterplan for the Meridian Water area in 2010.</p> <p><i>*The 2006 Employment Land Study is being updated by independent consultants to offer an up to date assessment of Enfield's employment land needs over the LDF period. The objective of the update is to reflect the changes that have taken place since 2006 and the effects of the current economic recession and its short to medium term impacts on the demand for employment land and premises. The outputs of the Study will be an update to the 2006 study which will contribute to the development of a robust evidence base to support the policies in the Core Strategy and may also inform future preparation of other Local Development Documents (LDDs).</i></p>

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	<p>Object to the omission, with no reason given, of text in CL Issues and Options report, which identified the area around Angel Road as a key area of search for new waste facilities (NLWA).</p>	<p>The majority of respondents to the CL Issues and Options Report support major transformation at Meridian Water. In particular, the options that relate to intensification and the encouragement of mixed uses, as well as higher density housing are all supported.</p> <p>The Council's Preferred Options report for the Core Strategy identified four areas of the Borough where evidence showed that numerous indicators of deprivation were increasing and that coordinated intervention was needed to meet these challenges and to promote transformational change. The report put forward the Council's preferred option for CL - to work with partners to transform the area into a series of vibrant and sustainable communities in the heart of the ULV (pg 101). There was general support for the Council's proactive strategic approach during the consultation. No comments were received from the NLWA on the report.</p> <p>These responses have helped to inform the development of the Council's Place Shaping Strategy published earlier this year. The Strategy brings together many of the existing priorities and strategies of the Council and its partners. It identifies four core areas within each of the AAP areas – Ponders End, Meridian Water, New Southgate and ET as priority areas for change and all corporate strategies and delivery plans and ultimately those of our partners will be aligned to support these priorities.</p> <p>In March 2009, the Strategic Growth Areas report was published for consultation, which included further details on the Council's preferred approach for Meridian Water.</p> <p>Further detail will be provided in the CL AAP – Preferred Options document.</p>
	<p>Support the promotion of mixed use and intensive development on specific sites but objects that this be restricted to a focus on land to the south of the NC Road. The potential for increased flexibility of use of land to the north of the NC, particularly those sites adjacent to the SRN, should also be investigated (Tribal MJ for SEGRO).</p>	<p><i>CP37: Central Leaside</i> states that the majority of the CL area will retain its industrial and employment character (see <i>CP14: Safeguarding Strategic Industrial Land</i>).</p> <p>A number of industrial locations in CL, have been identified as currently in active and beneficial employment. Apart from the estates on Harbet Road, all of these are located north of the NC Road. CP37 seeks to strengthen and extend the employment offer of these locations to support new and emerging businesses in sectors that are projected to expand in the long term (see <i>CP13: Promoting Economic Prosperity</i>).</p>

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		<p>South of the NC Road, where there is the greatest concentration of vacant and underutilised former industrial land, a new community will be developed at Meridian Water.</p> <p>Detail will be provided in the CL AAP.</p>
	<p>The CL area is in relatively close proximity to Thames Water's Deephams Sewage Treatment works. It is preferred that B1(c), B2 or B8 (employment related uses) are suitable in close proximity to the sewage works. (TW).</p>	<p>Detail will be provided in the CL AAP.</p>
	<p>Supports a mix of land uses in the area to the south of Angel Road, but objects to a prescriptive approach which designates sites for specific uses, in the absence of a commercial context (GVA Grimley for La Salle Investment Management).</p>	<p>Detail on opportunity sites with the CL are will be provided in the CL AAP.</p>
	<ul style="list-style-type: none"> <li>▪ This area is largely accessed from the NC, which forms part of the Transport for London Road Network (TLRN). An impact assessment to the TLRN should be incorporated into the evidence base. It is vital that development in the area does not affect the safe operation of the TLRN (TfL).</li> <li>▪ Traffic management measures can have an impact on the reliability of buses and detailed proposals should be developed in collaboration with the TfL Bus Priority Team to ensure that the proposals do not negatively affect bus services (TfL).</li> </ul>	<p>The Council has undertaken a Transport Assessment for the Pre-Submission Report, which considers the potential effect of the planned growth in the Borough to 2026. The Council has consulted extensively with TfL and the HA to finalise the Transport Assessment, which will be incorporated into the Evidence Base for Enfield's Local Development Framework.</p> <p>Detail will be provided in the CL AAP.</p>
	<p>This section needs to make reference to:</p>	
	<ul style="list-style-type: none"> <li>▪ The River Lee Navigation should be the heart of transformation at CL – the 'spine'. This would require significant third party funding and other initiatives. A water shuttle service between IKEA and Tottenham Hale has been explored by BW (BW).</li> <li>▪ The mix of housing types should include residential moorings (BW).</li> </ul>	<p><i>CP35: Lee Valley Regional Park and Waterways</i> seeks to make the best use of the waterway network (part of London's Blue Ribbon Network) in the ULV, including the River Lee, River Lee Navigation, seeking to fully restore the waterways and improve their pathways, and facilities for freight, recreational and educational use.</p> <p>Detail will be provided in CL AAP and Meridian Water masterplanning work.</p>
	<p>Supports the upgrading and intensification of employment uses alongside the western fringe of Harbet Road, but considers that a mix of uses also be considered appropriate, particularly where these would promote employment generating uses (GVA Grimley for La Salle Investment</p>	<p><i>CP37: Central Leaside</i> states that as a PIL, the existing employment uses at Harbet Road will be retained and intensified. A number of industrial locations in CL, including the Harbet Road estates, have been identified as currently in active and beneficial employment. CP37 seeks to strengthen and extend the employment offer</p>

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	Management).	<p>of these locations to support new and emerging businesses in sectors that are projected to expand in the long term (refer <i>CP13: Promoting Economic Prosperity</i>).</p> <p>Detail will be provided in the forthcoming update to the Enfield Employment Land Study (2009) and the CL AAP.</p>
	Supports proposals to upgrade Angel Road Station, provided details of how the Council intends to deliver the new facilities are included and tested (GVA Grimley for La Salle Investment Management).	<p>Improved access to rail stations is a priority in Enfield's LIP. The CL AAP and Place Shaping masterplan for Meridian Water will provide an opportunity to work more closely with partners, including NR, to provide more detail on possible public transport improvements, including improved access to Angel Road Station.</p> <p>Detail to be provided in the CL AAP.</p>
	It was suggested that additional policies should:	
	Support proposals to improve pedestrian accessibility across the site, and recommends that this is most effectively achieved if mixed use developments comprising of active frontages are proposed along pedestrian routes (GVA Grimley for La Salle Investment Management).	<p><i>CP37: Central Leaside</i> seeks to improve vehicular, pedestrian and cycles connections in the area. Opportunities will be taken to improve and open up access to the LVRP and waterfront by promoting opportunity areas along the Borough's eastern boundary.</p> <p><i>CP38: Meridian Water</i> refers to establishing a 'new spine' through the area, to connect all parts of Meridian Water, linking new and existing communities, the station and LVRP.</p> <p>Detail to be provided in the CL AAP and Enfield Design Guide.</p>
	Support the establishment of a new waste facility at Argon Road, CL also known as the former BOC Site (NLWA).	<p>The Council is fully committed to the preparation of the NLWP to identify suitable sites for waste treatment. As part of the Enfield's LDF, the NLWP must be in general conformity with the Core Strategy to ensure it is sound.</p> <p>Enfield's place shaping priorities have therefore informed the development of the Preferred Options Report for the Waste Plan published for consultation in October 2009. The process of developing the NLWP is supported by a considerable body of evidence covering the suitability of existing and new sites for waste uses. The Preferred Options Report concludes that there is sufficient land available across north London to meet the waste apportionment identified in the London Plan without the need to identify sites within Enfield's place shaping core areas, or indeed areas the subject of master planning exercises in the other partner boroughs.</p>

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		<p>The selection of suitable sites has also been mindful of the London Plan priorities for the ULV, which identifies the need to retain sufficient land for industrial purposes including waste management, away from key public transport hubs. The close proximity of the Meridian Water site to Angel Road station reinforces the suitability of this site for mixed use development due to its good access to public transport. Consequently neither Meridian Water (nor southern Brimsdown in NEE, for similar reasons) are identified in the shortlist of potential new sites for waste uses in the NLWP Preferred Option Report.</p>
	<ul style="list-style-type: none"> <li>▪ Include priorities for delivery, setting out broad time horizons and details of how the proposed social infrastructure will be funded (GVA Grimley for La Salle Investment Management).</li> <li>▪ Considers there should be a clear indication of how the improvements will be funded, rather than a reference to the fact that 'new' development will help to cross-fund improvements to transport and social infrastructure (does not meet the requirements of PPS12) (TfL).</li> </ul>	<p>The Implementation and Monitoring Section (Chapter 10 of the Pre-Submission Report) sets out a 'work in progress' summary table of the key infrastructure required, broad timescales and mechanisms for delivery (financial and other resources), in order to ensure the planned growth in the Core Strategy can be supported.</p> <p>Further detail will be provided in the CL AAP.</p>
	<p>Where proposed to secure funding through s106 contribution, reference to contributions requested should relate in scale and kind to the proposal and must have regard to viability (GVA Grimley for La Salle Investment Management).</p>	<p><i>CP46: Infrastructure Contributions</i> states that in negotiating contributions, individual site circumstances will be taken into account and particularly on those sites which give rise to abnormal costs it may be necessary to prioritise the provisions sought.</p> <p>Further detail on planning obligations will be provided in the DPD.</p>
	<ul style="list-style-type: none"> <li>▪ Recommends Council encourage high density, potentially higher value uses, such as retail, which could help cross fund required social and transport infrastructure and act as a catalyst for upgrading the existing employment accommodation (GVA Grimley for La Salle Investment Management).</li> <li>▪ Would oppose retail development at CL beyond neighbourhood/ local centre option (London Borough of Haringey).</li> </ul>	<p>In terms of high density, higher value uses in Meridian Water to help cross fund required infrastructure, detail will be provided in the CL AAP.</p> <p>In terms of retail provision at Meridian Water, <i>CP17: Town Centres</i> seeks to strengthen the role of Enfield's town centres by focusing new commercial, retail, leisure, office and other related uses within the centres according to the Borough's town centre hierarchy, using the sequential test to direct development to appropriate sites. This is in line with the London Plan and national guidance.</p> <p>A new local centre is proposed at Meridian Water to cater for the day to day needs of the new local community to be established. Therefore, proposals for a new local centre of no more than 2,000sqm gross for A1 – A5 uses are proposed.</p>

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	<p>The AAP and masterplan should recognise the opportunity to increase the density along thoroughfares and in other locations where appropriate (GVA Grimley for La Salle Investment Management).</p>	<p>Detail will be provided in the CL AAP and Meridian Water master planning work.</p>
	<p>Savills for Tottenham Hotspur Football Club comments:</p> <ul style="list-style-type: none"> <li>▪ Council needs to be explicit about the scale and size of the new centre at CL so that its relationship to other centres and facilities in the surrounding area is clear.</li> <li>▪ Planning for the development of significant additional retail floorspace in this currently out-of-centre location would require assessment against the principles and approach set out in PPS6.</li> <li>▪ Clear guidance will be required in the AAP, in due course, for the preparation of detailed facilities for the new centre.</li> </ul>	<p><i>CP17: Town Centres</i> states that a new local centre is proposed in Meridian Water, within CL, to cater for the day to day needs of the new local community that is to be established.</p> <p><i>CP38: Meridian Water</i> seeks to provide the necessary infrastructure to support a new community, attract families and new employers to the area. This infrastructure will include a new local centre offering a new health facility, library, community rooms, a police presence and local shops.</p> <p>Detail will be provided in the CL AAP.</p>
	<ul style="list-style-type: none"> <li>▪ Encourages emphasis to be placed on potential freight transport using the River Lee Navigation Channel for the movement of material, particularly waste, which would remove HGV vehicles from the surrounding road network (supports policies 4C.8 Freight uses on the Blue Ribbon Network and 4A.22 waste management of the London Plan) (TfL).</li> <li>▪ Supports the aspirations for the waterways - has the Council considered the potential for sustainable forms of transport for commercial/industrial/waste movements? (Sita UK)</li> </ul>	<p><i>CP27: Freight</i> seeks to investigate and promote, where appropriate, the potential for freight movement by water, including safeguarding wharves at Pickett's Lock and the London Waste Ecopark.</p> <p>The CL AAP will ensure that development takes into account the infrastructure required to facilitate the sustainable movement of freight, including along the waterways.</p>
	<p>Additional points:</p>	
	<p>LB Haringey comments:</p> <ul style="list-style-type: none"> <li>▪ The proposed CL growth area is adjacent to the Haringey Borough Boundary. Intensification of uses should take into account the infrastructure needs of local communities, including the neighbouring borough's communities.</li> <li>▪ The CL growth area is dissected by transport networks, need safe and good quality pedestrian and cycle links.</li> <li>▪ Growth area options should emphasise sustainable transport options.</li> <li>▪ Need to an Access Strategy, accompanied by public realm</li> </ul>	<p>As part of the planning for the development in CL, Council has looked at the requirements with regard to, for example, public transport, education and health. Services to meet the needs of any future residents have been planned for at least the first 5 years of the plan, beyond that Council will have to monitor population growth and the development process in the preceding years to plan for the next 10+ years.</p> <p>Comprehensive development focusing at Meridian Water will help provide opportunities to improve east-west links to the LVRP.</p> <p>It will help to improve the quality of life and stimulate regeneration both in the Meridian</p>

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	<p>improvements and enhancements to the environment.</p> <ul style="list-style-type: none"> <li>▪ Angel Road station proposals need to take Northumberland Park station in account.</li> <li>▪ Final housing numbers should be subject to capacity studies.</li> </ul>	<p>Water area and in surrounding areas, including existing employment areas and residential communities in Edmonton, North East Tottenham and Waltham Forest.</p> <p>Detail, including final housing numbers, Angel Road Station proposals, will be provided in the CL AAP and Meridian Water masterplan.</p>
	<p>Any proposed non-waste developments should consider any existing waste management facilities, and sites allocated for waste management, to ensure that they are not prejudiced (in accordance with PPS10, para 33) (Sita UK).</p>	<p><i>CP22: Delivering Sustainable Waste Management</i> states that the Council will safeguard existing waste management sites, transfer sites and any additional sites located in Enfield that are identified by the NLWP, unless compensatory site provision is made elsewhere within the seven constituent boroughs of the NLWP.</p>
	<p>New developments should be encouraged to use Combined Heat and Power (CHP) or renewable energy sources (Sita UK)</p>	<p><i>CP38: Meridian Water</i> supports a development that pioneers new environmental technologies. New housing will aspire to achieve the greatest levels of energy-efficiency, incorporating renewable power and using locally produced energy.</p> <p><i>CP20: Sustainable Energy Use and Energy Infrastructure</i> requires all new developments, and where possible via a retrofitting process of existing developments, to minimise energy use, use energy generated from renewable sources, and improve energy efficiency in line with London Plan and national policy.</p>
	<ul style="list-style-type: none"> <li>▪ Considers that while detailed transport analysis cannot form part of this type of document, some demonstration that the transport evidence has been used in the assumptions for levels of development required is necessary (TfL).</li> <li>▪ Need rigorous assessment of environmental and transport impacts and flood risk (London Borough of Haringey).</li> </ul>	<p>Some preliminary transport analysis was undertaken as part of the development of the CL AAP. This preliminary analysis was used to inform the Strategic Growth Areas report published in 2008.</p> <p>Further detailed transport analysis has been carried out and is provided in the Core Strategy Transport Assessment (2009). The Transport Assessment will inform the CL AAP – Preferred Options.</p> <p><i>CP28: Managing Flood Risk through Development</i> states that the Council will take a risk-based approach to development and flood risk, directing development to areas of lowest risk, in accordance with PPS25. However, in the development of sites in the CL and NEE AAP areas that lie within flood zones 2 and 3a, but that contribute to the strategic objectives for change in the ULV will be supported in principle. These schemes will be expected to comprehensively address flood risk, mitigating the impacts of the development and reducing flood risk overall.</p> <p>Detail will be provided in the CL AAP.</p>

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	<p>Objects to the premature assumption, or basing of a development scenario, around future improvements to rail services at Angel Road station, without consideration of alternatives (TfL).</p>	<p><i>CP37: Central Leaside</i> states that new development in Meridian Water will need to progress in tandem with phased improvements to public transport provision. In the early phases, an emphasis will be placed on improving bus services and frequencies. In the medium to long term, the Council will work with NR to deliver improvements to the setting of, and access to, Angel Road Station, in conjunction with the planned upgrade to the West Anglia Route through the ULV.</p> <p>Detail will be provided by the Core Strategy Transport Assessment 2009 (which the Council is working with TfL to finalise), and CL AAP.</p>
	<p>Considers contingency planning needs to be incorporated, which may lead to a reduction in the level of growth that can be achieved (TfL).</p>	<p>The Pre-Submission Report acknowledges housing targets will have to be reviewed if key transport improvements are not realised.</p>

### Section 3: North East Enfield including Ponders End

Section/ Topic/ Core Policy	Summary of main issues	Outcome/ Relevant section CP in the Pre-Submission Report
<p><b>3:</b> North East Enfield including Ponders End</p>	<p>There was general support for the principles in this section. In particular:</p> <ul style="list-style-type: none"> <li>▪ Broad agreement for approach, subject to BW comments made on NEE AAP Preferred Options (BW).</li> <li>▪ The identification of NEE as the focus for growth and change is generally supported. It reflects the broad approach being taken in the draft Opportunity Area Planning Framework (GLA).</li> <li>▪ The Council's preferred approach to future development of the Borough in respect of its identification of NEE as one of the areas where growth and regeneration are to be focused (Kier Property Developments)</li> <li>▪ The Council's suggestion that land at Southern Brimsdown, in particular the Ponders End Industrial Estate, is suited to the accommodation of new residential development (Kier Property Development).</li> <li>▪ The Council's intention to redevelop the Middlesex University site and that the importance of redeveloping the site to the area (Middlesex University).</li> <li>▪ The approach to Ponders End and agrees that the redeveloping of key sites such as the gasholder will be vital to the regeneration of this area (National Grid Holdings).</li> <li>▪ The Council's overall approach to</li> </ul>	

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	<p>safeguard existing employment land and supports the release of sites where it is vacant, underutilised and under performing for mixed use opportunities (NLWA).</p> <ul style="list-style-type: none"> <li>▪ Supports the identification of NEE, including Ponders End, as one of the priority areas for regeneration, the attraction of investment, and the enhancement of the environment (Tribal MJ for SEGRO Plc).</li> </ul>	
	<p>Concerns raised were:</p>	
	<p>Objects to the limited recognition given to the historic importance of the nearby flour mill (EH).</p>	<p><i>CP41: Ponders End</i> seeks high quality new development that complements the historic buildings and features of Ponders End, such as the listed Middlesex University building in Ponders End Central and Ponders End Flour Mill at Ponders End Waterfront.</p> <p>Detail will be provided in the Ponders End Planning Framework and NEE AAP.</p>
	<ul style="list-style-type: none"> <li>▪ Objects to the loss of 5.5 ha of employment land at Southern Brimsdown particularly on the site to the south of Duck Lees Lane for mixed use residential led development. Considers that there is no justification for the release of southern Brimsdown for mixed uses and has not been informed by a robust market appraisal. Considers that the release of southern Brimsdown is inconsistent with the Employment Land Study [which suggested the release of Innova Park, Queensway and Redburn Trading Estate] (NLWA).</li> <li>▪ Concerned about the potential loss of SEL and PIA (London Borough of Haringey).</li> </ul>	<p>The 2006 Enfield Employment Land Study* produced by consultants Halcrow recommends that any change/release of employment land should be strongly contested. However, comments provided by Halcrow in their 2006 report suggests that "the area is considered unsuitable for a change of planning use unless a significant "masterplan" can be drawn up..."</p> <p>The Council is currently working closely with the GLA to review all SIL designations in the Borough. Enfield's objective is to strengthen the role of those industrial sites in NEE and CL, which continue to meet the needs of modern industry. Much of the industrial land portfolio is busy, generally well-occupied, and continues to be strategically important for Enfield, the sub-region and London as a whole.</p> <p>Evidence suggests that there are a number of sites that are not currently occupied intensively for industry and are vacant or underused, such as land at Meridian Way, Glover Drive, Kimberly Road, and the southern parts of Brimsdown. These sites offer the potential for change to support urban regeneration within and around these areas that are currently experiencing high levels of deprivation.</p> <p>The Council is progressing a masterplan for Ponders End.</p> <p><i>*The 2006 Employment Land Study is being updated by independent consultants to offer an up to date assessment of Enfield's employment land needs over the LDF period. The objective of the update is to</i></p>

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		<p><i>reflect the changes that have taken place since 2006 and the effects of the current economic recession and resulting short to medium term impacts on the demand for employment land and premises. The outputs of the Study will be an update to the 2006 study which will contribute to the development of a robust evidence base to support the policies in the Core Strategy and may also inform future preparation of other Local Development Documents (LDDs).</i></p>
	<ul style="list-style-type: none"> <li>▪ Considers that any development within NEE should not have an unacceptable impact on the safe operation or bus journey times of either the A1010 Hertford Road / Ponders End High Street and the A110 Southbury Road / Nags Head Road / Lea Valley Road, as both form a part of the SRN. TfL should be consulted over any planned improvement works to these roads that are required in relation to delivering the necessary infrastructure to sustain proposed levels of growth (TfL).</li> <li>▪ Concerned about transport implications on Haringey (LB of Haringey).</li> </ul>	<p>The Council will work with other North London boroughs, TfL and partners to commission a strategic transport assessment for the ULV. It is intended the study will use dynamic modelling tools to undertake more detailed assessments of the impact of developments across a broader geographical scale (see the Road Network section of the Pre-Submission Report, CPs 24-26).</p>
	<p>TfL:</p> <ul style="list-style-type: none"> <li>▪ Notes references to the potential merits and benefits of a NGAP to improve accessibility and movement within NEE, in spite of concerns expressed by the HA regarding previous proposals for a NGAR.</li> <li>▪ Objects to references to new connections to the M25 and would not fund any proposals to increase major road capacity in NEE. Considers that an access package which did not increase through-traffic or have significantly detrimental environmental impacts could be contemplated. Alleviating some of the conflicts with freight movements (particularly along Mollison Avenue), in particular schemes which improve traffic management and conditions for buses, cyclists, pedestrians and freight movements could be investigated. It is hoped that NGAP will focus on delivering these elements rather than access to the M25.</li> </ul>	<p><i>CP24: Road Network</i> states that the Council will work with partners to continue to consider the potential merits, benefits and impacts of a NGAP to improve accessibility and movement within NEE.</p> <p>NGAP includes a package of transport measures to improve all transport modes including public transport and will be considered alongside alternatives. All reference to NGAR has been removed. Further detail will be provided in the IDP and NEE AAP.</p> <p>The Transport Assessment for the Core Strategy indicates that the NGAP scheme is not required to deliver planned growth in Enfield alone, due to the limited scale of the additional congestion caused by the projected trips as a result of proposed development in NEE. Therefore, NGAP should be considered in the context of growth in North London as a whole.</p>
	<p>This section needs to make reference to:</p>	
	<p>Columbia Wharf needs defining and should be more than an interesting focal</p>	<p><i>CP41: Ponders End</i> identifies three key areas of future development in the Ponders</p>

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	<p>point – it should be integral to place shaping (BW).</p>	<p>End area. One of these is 'Ponders End Waterfront' which includes Columbia Wharf and southern Brimsdown. CP41 seeks to create a mixed use, employment leisure and residential community at Ponders End Waterfront of exceptional quality, helping to reconnect the Ponders End community with its waterfront and contributing to the chain of attractions along the Lee Valley Regional Park.</p> <p>Detail will be provided in the Ponders End Framework for Change and the NEE AAP.</p>
	<p>Need to be more explicit about the 'listed' Broadbent Building on the Middlesex University site. This building requires careful management in the face of change and the other sites of heritage value such as Enfield Lock, Enfield Island Village (Royal Ordnance) and the King George Pumping House, further south (EH).</p>	<p><i>CP41: Ponders End</i> seeks to create high quality new development that complements the historic buildings and features of Ponders End, such as the listed Middlesex University building ('Broadbent') and Ponders End flour mill. CP 42 also seeks to reconnect the Ponders End community with its waterfront and promote the chain of attractions along the Lee Valley Regional Park.</p> <p>Detail will be provided in the Ponders End Framework for Change and the NEE AAP.</p>
	<p>Both groundwater and surface water protection should be incorporated into any specific development proposals in the area. As with CL, this area has a long industrial history including landfilling activity. There is an inner SPZ in the Ponders End area and North West of Brimsdown (EA).</p>	<p><i>CP32: Pollution</i> states that the Council will work with partners, including the EA, to address risks arising from contaminated land, through land remediation so it is suitable for the proposed end use. Proposals on or in the vicinity of potentially contaminated land will be assessed according to criteria set out in the Development Management DPD. Where appropriate, land contamination assessments will be required to consider the effects of development.</p>
	<p>Considers it will be important in any such scheme that the new homes at Southern Brimsdown create an attractive and sustainable community which, in part, will be reliant in achieving a critical mass of homes and residents. It may emerge that Southern Brimsdown can accommodate a greater amount of residential than has been assumed (at 1,100 dwellings). Suggests additional wording to allow flexibility in dwellings numbers (Kier Property Developments).</p>	<p><i>CP41: Ponders End</i> states that it is estimated that up to 1,100 new homes up to 2026, with a range of sizes and tenures, including affordable homes, could be provided in the Ponders End Opportunity Area. These figures are indicative only and further work will be done to refine the figures.</p> <p>Detail will be provided in the Ponders End Framework for Change and the NEE AAP.</p>

Section/ Topic/ Core Policy	Summary of main issues	Outcome/ Relevant section CP in the Pre-Submission Report
	<p>Supports identification of the southern end of Brimsdown at Duck Lees Lane for a new mixed use community as part of an employment led mixed use development, but notes that the report states that any such mixed development should result in "no net loss of jobs". The Strategy would be more realistic to recognise that achieving the same number of jobs on a smaller site area may not always be possible (Kier Property Developments).</p>	<p><i>CP14: Safeguarding Strategic Industrial Land</i> seeks to protect job loss by securing a strategic reservoir of employment land (SIL) in Enfield by protecting the majority of existing strategic employment sites and extending or identifying new sites. Any loss in employment land will be provided elsewhere in the Borough. The majority of the existing Brimsdown industrial estate will be retained as SIL. However, evidence suggests that there are a number of sites which are not currently occupied extensively for industry, this includes land at southern Brimsdown, where it is identified there is an opportunity for mixed use development.</p> <p><i>CP41: Ponders End</i> does not state that any mixed use development at southern Brimsdown should result in no net loss of jobs.</p>
	<p>To enable the existing gas holders to be removed, and assist in the regeneration of the wider area, alternative uses on the site need to be properly considered and provided for within the relevant DPDs, should further investigation into the proposed use of the gasholder site for an Academy School proves this proposal cannot go forward. (National Grid Property Holdings).</p>	<p>Detail will be provided in the NEE AAP and proposed planning brief for Ponders End South Street Campus (the collection of sites along South Street, where there are opportunities at the gasholder site on South Street, around Ponders End railway station, and at Alma Estate).</p>
	<p>Considers that the existing employment function of key employment land holdings, e.g. SEGRO land holdings, should be safeguarded such that future regeneration proposals within the area will not prejudice the commercial viability and regeneration opportunities of the site (Tribal MJ for SEGRO Plc).</p>	<p><i>CP14: Safeguarding Strategic Industrial Land</i> seeks to protect job loss by securing a strategic reservoir of employment land (SIL) in Enfield by protecting the majority of existing strategic employment sites and extending or identifying new sites. Any loss in employment land will be reprovided elsewhere in the Borough.</p>
	<p>While support is given to the focus on accessible locations and the creation of environments where people wish to live, work and access local facilities, suggests an assessment of the ability of infrastructure to support the levels of growth</p> <p>Such evidence is considered essential to properly assess the effect of the growth (TfL).</p>	<p><i>CP26: Public Transport</i> requires applications to be accompanied by Transport Assessments to demonstrate that existing or proposed public transport levels can accommodate development proposals, including, where appropriate, opportunities for public transport improvements.</p> <p>Detail will be provided in the NEE AAP.</p>
	<p>Additional points:</p>	
	<p>The key route through Ponders End (Hertford Road) needs to be expanded and opened, by improving traffic flow. It is clogged with traffic during much of the day, causing noise and pollution for the surrounding areas (Fair Share Ponders End).</p>	<p><i>CP40: North East Enfield</i> states the Council will promote improvements to public transport and access to the area by car, bicycle and on foot. In particular, improvements to the busy Hertford Road corridor will be sought to improve the environment for pedestrians and road users alike (see also <i>CP24: Road Network</i>).</p>

Section/ Topic/ Core Policy	Summary of main issues	Outcome/ Relevant section CP in the Pre-Submission Report
	<p>Considers the area is imbalanced in terms of green space and residential and commercial use. Green space is needed in the south west section of Ponders End place shaping area, and opportunities exist for more open space at the Middlesex University site (Fair Share Ponders End).</p>	<p><i>CP34: Parks, Playing Fields and Other Open Spaces</i> requires developers to contribute to improved open space provision, either through direct provision or contributions towards new open space in areas of deficiency, or through contributions towards improved quality in existing open spaces. The Council will also apply a Borough benchmark of 2.43 hectares of open space per 1,000 population when assessing new development. CP34 also seeks improvements to existing park provision through increasing access, upgrading the range of functions and facilities available at other publicly accessible open spaces and negotiating community use of non-public open spaces.</p> <p><i>CP41: Ponders End</i> seeks to create an attractive public realm and better street environment along Hertford Road and South Street, and improve links to the Ponders End Recreation Ground and Lee Valley Regional Park.</p> <p>Detail will be provided in the Ponders End Framework for Change , the NEE AAP and Development Management DPD.</p>
	<p>Supports more use and visibility of the river. The Council could encourage businesses to be moved closer to the A10, transforming the land along the river for residential and recreational purposes (Fair Share Ponders End).</p>	<p><i>CP41: Ponders End</i> refers to development opportunities at Ponders End Waterfront, which includes Columbia Wharf and southern Brimsdown located on the riverside. A new mixed use, employment, leisure and residential community of exceptional quality is proposed here, to help reconnect the Ponders End community with its waterfront and contribute to the chain of attractions along the Lee Valley Regional Park.</p>
	<p>Plan needs to mention creating community facilities e.g. community centre, recreation; spaces and sports provisions etc, and needs to show concrete timeframes for these proposals (Fair Share Ponders End).</p>	<p><i>CP41: Ponders End</i> seeks an attractive and safe public realm, improvements to Ponders End Recreation Ground, and a new mixed use, employment, leisure and residential community at Ponders End Waterfront. Opportunities to improve community service provision will also be explored.</p> <p><i>CP46: Infrastructure Contributions</i> states that in strategic growth areas, such as NEE - Ponders End, a more proactive and comprehensive approach to developer contributions will be taken through the AAP, seeking to ensure that required infrastructure and community facilities are provided for in parallel with the development of new homes and jobs and linking planning obligations to specific local priorities.</p> <p>Broad timeframes for these initiatives are included in the Implementation and Monitoring section of the Pre-Submission Report (Chapter 10). Detail will be provided</p>

Section/ Topic/ Core Policy	Summary of main issues	Outcome/ Relevant section CP in the Pre-Submission Report
		in the NEE AAP.
	<p>Considers that the Ponders End master plan should be brought forward under the auspices of the AAP, and therefore subject to public scrutiny, or at the very least as an SPD, in accordance with PPS12 (National Grid Property Holdings).</p>	<p>The development and implementation of the NEE AAP will set out the detailed planning framework for the delivery of the above policies.</p> <p>The Ponders End Framework for Change is being developed which presents an urban design vision for Ponders End that both articulates local needs and aspirations, and informs the Council, developers and service providers to deliver the vision through Place Shaping.</p> <p>As part of the Framework for Change three planning briefs, providing detailed masterplans, are being developed for identified future development areas at Ponders End, which will be incorporated into the LDF as SPDs and will therefore be consulted on.</p>
	<p>Notes the Council's preferred approach in the Lee Valley rail line investment would be to replace level crossings at Brimsdown and Enfield Lock stations with new bridges and/or underpasses. It is unclear if this can be delivered within the lifetime of the plan and references should be omitted if delivery is unlikely to be achieved (TfL).</p>	<p><i>CP25: Pedestrians and Cyclists</i> seeks partnership working between the Council and the Department for Transport, Network Rail and TfL to ensure that West Anglia improvements address the barrier to east-west movements for pedestrians and cyclists caused by the line in the east of the Borough, including the identification of alternative crossing points.</p>
	<p>Suggests the Council needs to be clearer about what transport enhancements are required for this suggested level of development, delivery, and what level of contributions from developers. It is also important that new development is phased to match improvements to the transport infrastructure, and that a method for monitoring the delivery of development is put in place, which should be linked to the required transport improvements (TfL).</p>	<p>Developer contributions are addressed in <i>CP46: Infrastructure Contributions</i> with public transport (along with affordable housing) receiving the highest priority.</p> <p>Further detail will be provided in the Development Management DPD. The Infrastructure Delivery Plan identifies existing and future transport needs and phasing.</p>

Section/ Topic/ Core Policy	Summary of main issues	Outcome/ Relevant section CP in the Pre-Submission Report
	<ul style="list-style-type: none"> <li>▪ Considers that the area to the south of Duck Lees Lane is appropriate as a waste facility. NWLA would support the development of waste facilities on sites that are located on PIL. Supports the development of waste facilities on sites in good proximity to the waterway, thereby utilising the River Lee to encourage sustainable transport (NLWA).</li> <li>▪ Supports the inclusion of the southern parts of Brimsdown within the boundary for Ponders End provided that the policy makes provision for waste management facilities to be developed on the southern parts (NLWA).</li> </ul>	<p>The Council is fully committed to the preparation of the North London Joint Waste Plan to identify suitable sites for waste treatment. As part of the Enfield' s LDF, the Waste Plan must be in general conformity with the Core Strategy to ensure it is sound. Enfield's place shaping priorities have therefore informed the development of the Preferred Options Report for the Waste Plan published for consultation in October 2009. The process of developing the Waste Plan is supported by a considerable body of evidence covering the suitability of existing and new sites for waste uses. The Preferred Options Report concludes that there is sufficient land available across north London to meet the waste apportionment identified in the London Plan without the need to identify sites within Enfield's place shaping core areas, or indeed areas the subject of masterplanning exercises in the other partner boroughs.</p> <p>The selection of suitable sites has also been mindful of the London Plan priorities for the ULV, which identifies the need to retain sufficient land for industrial purposes including waste management, away from key public transport hubs.</p> <p>The close proximity of southern Brimsdown to Brimsdown and Ponders End stations suitability of this site for mixed use development due to its good access to public transport. Consequently neither southern Brimsdown nor Meridian Water, in CL for similar reasons, are identified in the shortlist of potential new sites for waste uses in the NLWP Preferred Option Report.</p>
	<p>Considers that improving accessibility for pedestrians and cyclists to the waterside and Lee Valley Park should not compromise the commercial requirements of a modern high quality industrial/warehouse development or contribute to the loss of valuable environment land (SEGRO Plc).</p>	<p><i>CP40: North East Enfield</i> seeks to enhance NEE's reputation as a thriving and competitive industrial business location, with the PIL of Brimsdown, Redburn Trading Estate and Meridian Business Park and Freezywater retained, with the latter expanded to include Innova Park. These estates will continue to be the focus for environmental improvements and investment, developing new industries, particularly in the niche high-tech and green industry sectors.</p>
	<p>Considers the opportunities for change should not result in constraints on redevelopment of existing employment land, which may impact upon the efficiency of use of employment land and financial viability in the current property market (Tribal MJ for SEGRO Plc).</p>	<p>The availability of employment land of the right type and in the right location is central to achieving the Council's policy on economic prosperity and job growth. <i>CP14: Safeguarding Strategic Industrial Land</i> secures a strategic reservoir of employment land (SIL) in Enfield.</p>

Section/ Topic/ Core Policy	Summary of main issues	Outcome/ Relevant section CP in the Pre-Submission Report
	<p>Encourages the inclusion of references to locating green industries adjacent to the waterway, e.g. where the River Lee Navigation passes through industrial estates. This would significantly contribute to the connectivity of green industries by sustainable means, not only within the area, but also across London (TfL).</p>	<p>The Council considers green technologies as a growth sector industry for the Borough's economy (see <i>CP16: Taking Part in Economic Success and Improving Skills</i> and Chapter 6: Core Policies for Economic Development and Enterprise. <i>CP27: Freight</i> seeks to investigate and promote, where appropriate, the potential for freight movement by water.</p> <p>The relationship between green industries and the waterways will be investigated further in the development of the NEE AAP.</p>

#### Section 4: The North Circular Area around Bounds Green including New Southgate

Section/ Topic/ Core Policy	Summary of main issues	Outcome/ Relevant section CP in the Pre-Submission Report
<p><b>4:</b> The North Circular Area around Bounds Green including New Southgate</p>	<p>There was general support for the principles in this section.</p> <ul style="list-style-type: none"> <li>▪ The identification of the NC Road as the focus for growth and change is generally supported. It reflects the broad approach being taken in the draft Opportunity Area Planning Framework (GLA &amp; Legal and General)</li> <li>▪ Agrees with the preferred approach, but looks forward to more specific plans in time (Southgate District Civic Trust).</li> <li>▪ The commitment to ensure that any new development in the area will not prejudice the possibility of future junction improvements. TfL's safety and environment scheme for the A406 provides a way forward for some of this area, without ruling out an 'intermediate' scheme of additional traffic capacity at some stage in the future (TfL).</li> <li>▪ Supports the mention of New Southgate Millennium Green as a focus for the new Ladderswood Estate development (Resident).</li> </ul>	
	<p>Concerns raised were:</p>	
	<p>LB Haringey comments that:</p> <ul style="list-style-type: none"> <li>▪ The NC proposed growth area is adjacent to their boundary. Intensification of uses should take into account the infrastructure needs of local communities, including the neighbouring borough's communities.</li> <li>▪ Considers there is an open space deficiency in the NC area located in Enfield, which LB Enfield needs to address.</li> <li>▪ Supports the creation of a green link through the Enfield Gateway site</li> </ul>	<p>As part of the planning for development around the NC, Council has looked at the requirements with regard to, for example, public transport, education and health. Services to meet the needs of any future residents have been planned for at least the first 5 years of the plan, beyond that Council will have to monitor population growth and the development process in the preceding years to plan for the next 10+ years.</p> <p>The Council has undertaken a Transport Assessment for the Pre-Submission Report, which has been used to inform these</p>

Section/ Topic/ Core Policy	Summary of main issues	Outcome/ Relevant section CP in the Pre-Submission Report
	<p>(Western Gateway) to Telford Road Ecological Corridor.</p> <ul style="list-style-type: none"> <li>▪ Need to promote sustainable transport options and assess transport impacts on Haringey from the NC area. Growth area options should emphasise sustainable transport options.</li> </ul>	<p>policies.</p> <p><i>CP24: The Road Network</i> identifies the A406 NC as a top priority for improvement and seeks to encourage sustainable travel choices and reduce growing congestion levels through the promotion of Travel Demand Management Programmes.</p> <p>Detail will be provided in the NC AAP and New Southgate masterplan.</p>
	<p>In regard to the need for the equivalent of a new primary school (page 18):</p> <ul style="list-style-type: none"> <li>▪ In the case of Springfield Road Primary School, opposes the building of further school premises on the existing school playing field to the east of the school, or on the existing amenity green space to the west of the school, as there is insufficient open space for the community of this area.</li> <li>▪ If the school is to expand, consultation with the local community would need to be carried out on the possibility of rebuilding the school with two storeys (Mr B Kestelman).</li> </ul>	<p>Current estimates indicate a potential need for the equivalent of a new primary school in the wider area, given the housing growth proposed. However, the location of the proposed new school is subject to more detailed work on the type and amount of potential new homes planned and the location of new facilities.</p> <p>Detail will be provided in the NC AAP.</p>
	<p>It was suggested that additional policies should:</p>	
	<p>More recognition needs to be given to the area's wider historic environment (EH).</p>	<p><i>CP46: Infrastructure Obligations</i> lists provisions to be considered in regard to planning obligations. This includes protecting and enhancing Enfield's built heritage through contributions to the Council's key heritage area schemes and listed buildings identified on the Buildings at Risk Register.</p> <p>Detail will be provided in the New Southgate Masterplan and NC AAP.</p> <p>See also <i>CP31: Built and Landscape Heritage</i>.</p>
	<p>Additional points:</p>	
	<p>Savills for Legal and General comments (in regard to the Western Gateway site):</p> <ul style="list-style-type: none"> <li>▪ The site is currently occupied by relatively valuable retail uses and an operational gas holder, therefore development opportunity will only arise if planning permission is granted for uses of sufficient value to displace those currently onsite - and in regard to the gas holder, removal and remediation.</li> <li>▪ Supports the addition of a hotel to add to the vitality and mix of uses on site and new retail development,</li> </ul>	<p><i>CP45: New Southgate</i> seeks to establish a mixed-use redevelopment at the Western Gateway site to create landmark architecture at the gateway to the Borough.</p> <p>Detail will be provided in the New Southgate Masterplan and NC AAP. The outcomes of the forthcoming updated retail study for the Borough will also be taken into account.</p>

Section/ Topic/ Core Policy	Summary of main issues	Outcome/ Relevant section CP in the Pre-Submission Report
	<p>which would provide local facilities for residents and reduce the need to travel.</p>	
	<p>Questions how much of the Ladderswood estate is likely to be demolished and encourage that any rebuilding be of high architectural and energy saving standards (Southgate District Civic Trust).</p>	<p>Ladderwoods estate is planned to be redeveloped with development commencing in the short term. The Core Strategy document is unlikely to be adopted prior to planning applications being lodged for the site, however, high standards of architectural design and energy saving standards will be sought as it is a Council led development.</p>
	<p>Emphasis should be placed on reducing traffic levels entering and passing through the development zone, curtailing the number of car commuters using Arnos Grove and New Southgate stations, and improving bus connections to the stations (Southgate District Civic Trust).</p>	<p><i>CP24: The Road Network</i> identifies the A406 NC as a top priority for improvement. CP24 also seeks to encourage sustainable travel choices and reduce growing congestion levels through the promotion of Travel Demand Management Programmes. Requirements for transport assessments, travel plans, car clubs and car share schemes will be set out in the Development Management DPD.</p> <p><i>CP45: New Southgate</i> seeks to facilitate urban design solutions for the area based on more traditional street layouts, integrated with the wider area by a network of green spaces and better links for pedestrians and cyclists.</p> <p>Detail will be provided in the New Southgate Masterplan and NC AAP.</p>
	<p>Notes that the 2,000 proposed new homes in the NC area will have an impact on the neighbouring Borough of Barnet, and it is important that both Councils work together in partnership to address the social, community and physical infrastructure implications of this housing growth (LB Barnet).</p>	<p>As part of the planning for development around the NC, Council has looked at the requirements with regard to, for example, public transport, education and health. Services to meet the needs of any future residents have been planned for at least the first 5 years of the plan, beyond that Council will have to monitor population growth and the development process in the preceding years to plan for the next 10+ years.</p>
	<p>Need to ensure that the Council's proposals for the area coordinate with the rail services at New Southgate station Arnos Grove, as transport links for new employment and residential developments in this area are essential (Resident).</p>	<p>The Council recognises the importance of transport links in this area. <i>CP45: New Southgate</i> seeks a holistic and integrated approach to development considering the Western Gateway site, the Ladderswood Estate and the New Southgate Industrial Estate together and in relation to their surroundings.</p> <p><i>CP26: Public Transport</i> seeks to improve public transport interchanges to facilitate better integration between modes including provision for taxis, and cycle parking and storage, particularly at Enfield Town, Edmonton Green, Ponders End, New Southgate and Southgate Circus.</p>

Section/ Topic/ Core Policy	Summary of main issues	Outcome/ Relevant section CP in the Pre-Submission Report
		Detail will be provided in the New Southgate Masterplan and NC AAP.
	<p>Considers that it is over 37 years since anything was done to the NC (N13) Bounds Green and New Southgate and questions how long it will be before the project starts, as everywhere else seems to be changing (Resident).</p>	<p>The Council commenced the NC AAP in 2007 as a means to address the blight and poor environment caused by indecision at a national and regional level over future road widening on this section of the NC. Work is well underway on the AAP, and the final phase (Submission Report) of this plan development is expected to take place in late 2010. In the meantime, the Council is progressing further detailed master planning work for the New Southgate area, which will also be used to inform the AAP.</p> <p>Since 2007, the Council has granted planning permission to TfL for a Safety and Environmental Scheme that provides a degree of certainty about the future of the road. In addition, over £54 million government funding has recently been awarded to upgrade and refurbish the TfL-owned properties along the NC road. These properties will be transferred to Notting Hill Housing Trust who will invest a further £35 million to refurbish and build new affordable homes on vacant sites. This total investment of £90 million will help deliver the regeneration of the area – bringing underused land, which no longer needs to be safeguarded for the road back into positive use for new homes and other uses, and improving the living and working environment in the communities alongside it (see CP44: North Circular Area).</p>

## Section 5: Enfield Town

Section/ Topic/ Core Policy	Summary of main issues	Outcome/ Relevant section CP in the Submission Report
<p>5: Enfield Town</p>	<p>There was general support for the principles in this section.</p> <ul style="list-style-type: none"> <li>▪ The Council's commitment and aspirations to protect and retain ET's heritage assets and tradition, and historic market town character (EH, Southgate District Civil Trust).</li> <li>▪ The Council's approach to pay due regard to the character and setting of the conservation area, when introducing major change to the ET Station area (EH).</li> <li>▪ The identification of ET as the focus for growth and change is generally supported. It reflects the broad approach being taken in the draft Opportunity Area Planning Framework (GLA).</li> <li>▪ Supports general direction and scope of policies but considers that</li> </ul>	

Section/ Topic/ Core Policy	Summary of main issues	Outcome/ Relevant section CP in the Submission Report
	<p>scale and complexity of proposals should not inhibit individual proposals which can aid regeneration and continued focus for future development within the town centre around ET Station (Planning Works for Lionsgate Properties).</p> <ul style="list-style-type: none"> <li>▪ Supports the production of a detailed master plan where in-depth consideration is given to the compatibility of existing and future uses (Royal Mail Group).</li> <li>▪ Supports in principle, measures to improve the existing public transport interchange and improve accessibility in and around the town centre (Royal Mail Group).</li> <li>▪ General support for the preferred approach, but looks forward to more specific plans in time (Southgate District Civil Trust).</li> <li>▪ Supports ET centre as the obvious destination for a 'higher quality' cultural venue that would make a substantial contribution to the evening economy (Theatres Trust).</li> </ul>	
	<p>Concerns raised were:</p>	
	<ul style="list-style-type: none"> <li>▪ Recognises the potential benefits of a new and improved transport interchange at ET Station, however, the complete removal of the bus stands at Little Park Gardens will reduce bus services into the town centre. This has business case implications in terms of bus patronage and bus operations since it may mean longer out of service bus workings and buses may be affected by congestion in the eastern part of the town. TfL would require detailed discussions on this issue (TfL).</li> <li>▪ Objects to the relocation of the bus stands unless a new facility that is the equivalent or higher in capacity or better in location, has been agreed with London Buses and has been delivered. (TfL).</li> </ul>	<p><i>CP26: Public Transport</i> seeks to improve public transport interchanges to facilitate better integration between modes, including provision for taxis, and cycle parking and storage, particularly at ET, Edmonton Green, Ponders End and New Southgate.</p> <p>This includes an improved interchange at ET Station, potentially incorporating a relocated bus station from Little Park Gardens (see <i>CP43: The Area around the Enfield Town Station</i>).</p> <p>The Council is working closely with partners, including TfL and London Buses, to provide more detail on possible public transport improvements in the strategic growth areas.</p> <p>Detail will be provided in the ET AAP.</p>
	<p>The proposed link road would need to adhere to policy 3C.16 of the London Plan which requires development plan documents to incorporate the criteria in the policy for assessing road schemes. In particular, it has not been demonstrated in this document that the link road would improve safety for all users, or improve conditions for pedestrians, cyclists, disabled people, public transport, and freight. It is unclear if buses are expected to use the</p>	<p>The Council is currently progressing a transport assessment study for ET, including the implications of the proposed link road. The study, together with the Core Strategy Transport Assessment, will inform the ET AAP.</p>

Section/ Topic/ Core Policy	Summary of main issues	Outcome/ Relevant section CP in the Submission Report
	link road, or if there will be any changes for pedestrian routes from Church Street and Cecil Road to the eastern area (TfL).	
	<ul style="list-style-type: none"> <li>▪ As stated at the ET (Stage 3) Design Workshop on 16 October 2008, Royal Mail considers that the Enfield Delivery Office forms an important part of its operational network and there are no plans to relocate this viable operation at this time and requests the Council continue to engage with Royal Mail throughout this process.</li> <li>▪ Supports the Council's objectives to promote growth and regeneration in the ET Station area, but would resist plans to relocate without the provision of an appropriately worded re-provision policy and encourages the Council to consider the compatibility of future neighbouring with the existing Enfield Delivery Office (Royal Mail Group).</li> </ul>	The Council is currently in discussions with the Royal Mail Group, and will continue to seek the views of Royal Mail, and other key stakeholders, to help inform the ET AAP.
	This section needs to make reference to:	
	It is unclear if the repositioning or redevelopment of ET Station will occur within the lifetime of the plan. This should be clarified and contingencies developed if there is not a reasonable prospect of provision (TfL).	A number of development scenarios are being assessed for the ET Station area, alongside a transport assessment study for ET. Detail will be provided in the ET AAP.
	Considers an impact assessment will be required forming part of the evidence base for the anticipated levels of growth as much of the road network in the town centre is a part of the SRN. It needs to be ensured that any development will not have an unacceptable impact on these roads, including any adverse impacts on buses (TfL).	The Council is currently progressing a transport assessment study for ET, including the implications of the proposed link road. The study, together with the Core Strategy Transport Assessment, will inform the ET AAP.
	It was suggested that additional policies should:	
	Encourage the development of a comprehensive masterplan based on a sound understanding of the historic development of the Town, and its heritage value, by recognising and valuing both designated and non-designated assets, their settings and their relationship with each other (EH).	<p><i>CP42: Enfield Town</i> seeks to retain ET's market town character and protect its heritage assets, whilst maximising development opportunities to enhance the retail function of the centre to better serve the retail and community needs of the Borough and beyond.</p> <p><i>CP43: The Area around Enfield Town Station</i> proposes a high quality new urban environment and gateway to the town, which complements its historic core. While the focus of the proposed major development is outside the Conservation Area, it must pay</p>

Section/ Topic/ Core Policy	Summary of main issues	Outcome/ Relevant section CP in the Submission Report
		<p>due regard to its character and setting.</p> <p>Council Conservation Staff are involved in the development of the ET AAP and masterplan for the ET Station area.</p>
	<p>Encourages proposals for a performance space in ET, which would relate to the two other existing performance spaces in the Borough (Theatres Trust).</p>	<p><i>CP11: Recreation, Leisure, Culture and Arts</i> states that the Council is facilitating a major capital project to establish ground floor cultural facilities at Thomas Hardy House. CP11 also seeks to identify the need for new facilities in ET and set out arrangements for delivery, including the reconfiguration of existing sites.</p>
	<p>Additional points:</p>	
	<p>Recommendation that a detailed analysis of the historic development of the area, its contextual qualities and heritage value should be undertaken as part of any future masterplan for the area (EH).</p>	<p>The ET CAA was one of the key background documents informing the preparation of the ET AAP. Any future update of the CAA (normally undertaken every five years) would inform future revision of the masterplans.</p>
	<p>Any policy aspiration to resist the loss of existing offices within ET unless re-provided elsewhere, is not regarded as a viable policy direction (Planning Works for Lionsgate Properties).</p>	<p><i>CP42: Enfield Town</i> states that the town will continue to play a commercial role in the Borough – as such the loss of office uses will be resisted and new fit-for-purpose office uses within new developments provided.</p> <p>However, the Council will promote mixed use development with office uses in town centres or sites within strategic growth areas that are subject to a comprehensive masterplan, where it is demonstrated that higher value uses, such as residential, are required in order to make office development viable (<i>CP19: Offices</i>).</p>
	<p>The scale of the proposals for the area around ET Station is significant, and therefore the complexity of these proposals must be assessed against the impact that this will have on deliverability and timescales. The approach should be flexible enough to recognise and promote individual proposals within the area, therefore allowing catalyst development to help aid the overall renewal process (Lionsgate Properties).</p>	<p>Section 9.4: Enfield Town notes that careful testing of the development mix will ensure that a viable scheme can be brought forward. The ET place shaping priority area has the potential to meet much of the retail and leisure demand as well as improving the town's residential stock. Through careful planning of this area, redevelopment of this land would help to contribute to these needs and add to Enfield's town centre offer.</p> <p>Detail will be provided in the ET AAP.</p>

## Summary of responses to the Sustainability Appraisal

Summary of main issues	Outcome
Concerns raised were:	
<p>Report appears satisfactory in terms of the general methodology. However, concern raised how the Council reached the current preferred Spatial Strategy, as opposed to the earlier "Triple Arc" approach. The Report appears to ignore much of the work that went on before and simply looks at the three options now presented with the most detail on the preferred strategy of "focussed growth" (GOL).</p>	<p>Section 3.1, in particular paragraphs 3.1.4 – 3.1.6 of the <b>Preferred Options Report</b> explains the change from the 'Triple Arc' approach to basing the Spatial Strategy on three values:</p> <ul style="list-style-type: none"> <li>▪ Making best use of the Borough's natural resources,</li> <li>▪ Retaining and improving its pleasant suburban townscapes, and</li> <li>▪ Revitalising its communities, and creating new ones, where needed.</li> </ul> <p>The Pre-Submission Report then follows this with policies to regenerate certain parts of the Borough and policies to maintain and enhance existing established areas.</p>
<p>Report does not show that the preferred option for the strategy has been fully screened in terms of the Habitats Directive: there is mention of the Directive under the relevant policy area, but no detailed explanation of any screening process having been undertaken (GOL).</p>	<p>The need to screen the CS or any other plan for effects under the Habitats Regulations is entirely separate from the need for SA and the need for SEA.</p> <p>The screening report will be presented separately during the examination period.</p>
<ul style="list-style-type: none"> <li>▪ Objective on historic environment has been combined with issues relating to green and open spaces. The historic environment must be seen as a separate SA objective (EH).</li> <li>▪ Question posed in the second column does not ask whether the 'Preferred Option' would enhance the Borough's heritage assets and other culturally important features. In addition, no reference has been made to the setting of heritage assets and the wider historic environment (EH).</li> </ul>	<p>The SA Objectives were agreed through the statutory scoping process so it would be inappropriate to change them at this stage.</p> <p>Chapter 12 of the SA Report is devoted to Cultural Heritage.</p>
<p>Expect at Core Strategy stage a series of broad locations to have been considered with the relative flood risk implications of each option being clearly stated. There needs to be a clear indication of the relative flood risks between options. Once identified, the lowest risk broad locations should be tested for suitability against the sustainability appraisal ahead of higher risk (of flooding) 'reasonable alternatives'. By following this process it needs to be clearly demonstrated why your choice of the broad directions of growth has been made, taking into account the known flood risk. In our view the areas identified for development, need to undergo the sequential test/approach on a district wide basis (EA).</p>	<p>A Sequential Test at the district-wide level has now been undertaken. As part of this process the relative sustainability of the broad locations identified for growth have been examined, with the social, environmental and economic implications of development explicitly weighed against flood risk.</p> <p><i>See High Level Sequential Test: London Borough of Enfield Core Strategy Submission Document (2009).</i></p>
<p>It is understood that the forthcoming Development Management DPD will set out the approach to considering the impacts of development proposals on air quality. Whilst this is welcomed, concerned that the cumulative impact of development in the Borough on air quality should be assessed. Suggest the SA should contain evidence outlining</p>	<p>Chapter 14 of the SA Report addresses air quality and references Directive 1999/30.</p> <p>The key pollutants in Enfield are nitrogen dioxide and small particles, mostly sourced from traffic.</p> <p>The following SA / SEA Objectives are relevant:</p>

Summary of main issues	Outcome
<p>the effect of LDF development on air quality, with particular reference to Directive 1999/30 (HA).</p>	<ul style="list-style-type: none"> <li>▪ To reduce air pollution and ensure air quality continues to improve.</li> <li>▪ To reduce road congestion.</li> </ul> <p>The Core Strategy policies are likely to have only a marginal effect on air quality. This is because the background levels of various pollutants are already relatively high in London. Nevertheless the wording of <i>CP32: Pollution</i>, which refers to the expectation that new development will 'improve air quality by reducing pollutant emissions', suggests that the Policy will raise the profile of air quality compared with the UDP policy.</p> <p><i>CP20: Sustainable Energy Use and Energy Infrastructure</i> on the other hand, aims to ensure that the correct infrastructure is in place before allowing development to go ahead. This would mean that roads would have sufficient capacity to carry the expected traffic, meaning less congestion and thereby lower levels of pollution. Similarly <i>CP44: North Circular Area</i> is intended, inter alia, to relieve congestion, which should indirectly lower pollution from traffic. Both policies are likely to be marginally beneficial.</p>

## **Additional consultation with key delivery partners carried out in response to the changes to PPS12**

- 3.20 Since the publication of the Core Strategy Preferred Options Report the Government has issued a revised PPS12: 'Creating Strong Safe and Prosperous Communities through Local Spatial Planning' (June 2008). The revised guidance places a requirement on the local authority to demonstrate how it will plan for the necessary physical, social and green infrastructure to accommodate the levels of development being proposed. The Council's IDP seeks to satisfy the PPS12 requirement and forms part of the evidence base to support the LDF.
- 3.21 The Council's IDP aims to establish what infrastructure is required, where it will be provided, and when it will be delivered to serve the proposed level and location of development within the Borough.
- 3.22 The IDP has been produced following discussions with numerous service providers for example; the PCT, utilities companies, and emergency services providers, together with various Council departments (including education, libraries, parks, leisure and recreation, transportation and highways) these discussions have taken place over a number of months in the first part of 2009.
- 3.23 A workshop was also held at the end of September 2009 with the PCT, and various Council departments namely Adult Health and Social Care, Children's Services, Leisure Services and Highways to discuss potential locations for infrastructure provision within the Strategic Growth Areas and potential opportunities for the co-location of facilities.
- 3.24 The IDP is accompanied by an IDP Schedule which details capital infrastructure schemes that are programmed to take place; this is a "live" document that will be revised as part of the AMR so that schemes can be added, amended, or removed as the LDF moves through its timeline.
- 3.25 The information gathered in producing the IDP has informed many of the Core Policies contained within the Pre-Submission Report.

## 4.0 Pre-Submission Core Strategy Report

4.1 The Pre-Submission Report and its accompanying Sustainability Appraisal are available to view at the following locations:

- Enfield's Public Libraries
- The Civic Centre, Enfield Town

The documents are also available to view on the Council's website at:  
[www.enfield.gov.uk/core-strategy](http://www.enfield.gov.uk/core-strategy)

4.2 Representations are invited relating to issues of soundness on the Pre-Submission Report. To be *sound* a core strategy should be justified, effective and consistent with national policy. *Justified* means that the document must be founded on a robust and credible evidence base and is the most appropriate strategy when considered against the reasonable alternatives. *Effective* means that the document must be deliverable, flexible and able to be monitored.

4.3 Representations can be made from Monday 14 December 2009 until Friday 29 January 2010. We would encourage you to send us your comments using the Council's on-line consultation system. To access this system, view the document and submit your comments using the following link:  
<http://consult.enfield.gov.uk/portal>

Alternatively, you may also make your comments in writing and send them to:

The Planning Policy Team  
Place Shaping and Enterprise Department

London Borough of Enfield  
Civic Centre  
Silver Street  
Enfield  
EN1 3XA

Tel: 020 8379 5181  
Fax: 020 8379 3887

or email: [ldf@enfield.gov.uk](mailto:ldf@enfield.gov.uk)

4.4 **The closing date for comments is Friday 29th January 2010.**

*Please note that all comments made on the Core Strategy Pre-Submission Report will be made available for public inspection.*

4.5 What happens next

Following this period the Council will submit the Core Strategy to the Secretary of State for Communities and Local Government who will arrange for it to have an independent examination. It is anticipated that this will take place in Spring 2010.

## **APPENDICES**

- A** List of specific and general consultees – Issues and Options
- B** Copy of press release – Issues and Options
- C** List of respondents – Issues and Options
- D** List of specific and general consultees – Preferred Options
- E** Copy of press notice – Preferred Options
- F** List of respondents – Preferred Options
- G** List of respondents – Strategic Growth Areas

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## **Appendix A: List of specific and general consultees - Issues and Options**

The following specific and general bodies (as defined by the Town and Country Planning (Local Development) (England) Regulations 2004) were consulted (as well as other bodies) on issues and options:

### *Specific consultation bodies*

- Airwave O2 Limited
- Barnet Council
- British Gas
- British Telecommunications Plc
- Broxbourne District Council
- Cable & Wireless Plc
- East of England Development Agency
- Ecotricity
- EDF Energy Networks
- English Heritage - London Region
- Environment Agency
- Epping Forest District Council
- Essex County Council
- Good Energy
- Greater London Authority
- Green Energy UK
- Hertfordshire County Council
- Hertsmere Borough Council
- Highways Agency
- Hutchison 3G UK Ltd
- Interoute Communications (UK) Ltd
- London Borough of Haringey
- London Borough of Waltham Forest
- London Development Agency
- National Grid
- Natural England
- Network Rail
- NHS London
- Northaw and Cuffley Parish Council
- Npower
- Orange
- O2 PLC
- O2 (UK) Ltd
- Powergen
- Scottish Power
- Southern Electric
- Thames Water Property Services
- Three Valleys Water
- T-Mobile (UK) Ltd
- Utilita
- Virgin Media Limited
- Vodafone Limited
- Waltham Abbey Town Council
- Welwyn Hatfield District Council
- WHP Wilkinson Helsby
- 3G

*General consultation bodies*

- Age Concern Enfield
- Borough of Enfield Voluntary Association for the Disabled
- Christian Action Housing\*
- Community & Environment Project Office Ltd
- Enfield Business & Retailers Association\*
- Enfield Children & Young Persons Services
- Enfield Community Empowerment Network\*
- Enfield Disability Action
- Enfield Enterprise Agency
- Enfield Housing Association Forum
- Enfield Parents and Children
- Enfield Racial Equality Council
- Enfield Society\*
- Enfield Sports Advisory Council
- Enfield Voluntary Action
- Faith Forum
- Federation of Enfield Community Associations
- Federation of Enfield Residents' & Allied Associations (FERAA)
- Greek & Greek Cypriot Community of Enfield\*
- North London Business
- North London Chamber of Commerce
- Old Enfield Charitable Trust
- One to One (Enfield)
- Over 50s Forum\*
- Prospects\*
- Victim Support Enfield\*

*Other bodies consulted*

- Andrew Stevens Care Ltd\*
- Arriva London North
- Barnet, Enfield & Haringey Mental Health Trust\*
- British Waterways- London Region
- Enfield College\*
- Enfield Primary Care Trust\*
- First Capital Connect
- Learning Skills Council\*
- Lee Valley Regional Park Authority\*
- London Buses
- London Travel Watch
- London Wildlife Trust
- Metropolitan Police\*
- Middlesex University
- One Railway, later superseded by National Express
- Transport for London

NB: \* indicates organisations that attended the joint Thematic Action Group event on 18<sup>th</sup> April 2008.

## Appendix B: Copy of press release – Issues and Options

### **RESIDENTS ASKED TO HELP SHAPE FUTURE OF BOROUGH BOLD NEW INITIATIVE TO IMPROVE ENFIELD UNDERWAY WITH LAUNCH OF ONLINE CONSULTATION**

The first stages in a project to enhance Enfield and shape the borough's future development is about to kick off with the launch of a new online consultation process and Enfield residents are being asked to play a key part.

The Council is preparing a new planning framework for the borough, the Local Development Framework, and wants to know right at the start what you think about the issues facing the borough.

Although Enfield is already a great place to live in, we want it to be better. This is where residents can help. The Council wants to hear your views on what you think will make Enfield even better? Would you like to see more jobs, affordable housing and greater economic prosperity? Maybe you are a young person and feel that there is not enough to do in the borough? Perhaps the environment and low crime levels top your list of concerns? Or as a parent with young children, you would like to see more leisure facilities and more schools?

Whatever your views, now is the time to tell us. Enfield Council wants to hear from you before the end of May 2007. Two new documents, *Enfield's Choices* and *Enfield Town Action Plan*, have now been put on the Council's website to start the online consultation.

- *Enfield's Choices*

This document sets out the key planning issues facing the borough over the next 25 years and asks for views on the best options to address these issues. Your views will influence the Enfield Plan's Core Strategy, which will set out a vision for the future development of the borough. It will cover a broad range of strategic issues such as housing, employment, shopping, leisure, transport, social infrastructure and community facilities.

- *Enfield Town Action Plan*

The Council is also preparing more detailed plans for key areas of the borough. The plan for Enfield Town has reached a key stage, and the second new document on the website is a report setting out the Council's views on the specific issues facing Enfield Town, and a range of potential options to address these issues.

The final Area Action Plan will provide a strong vision for the town, seeking to balance new development with the need to protect the town's heritage and identity. A public exhibition is being held on Saturday 12 May in Palace Gardens shopping centre. The exhibition will summarise the key issues and options in the report and representatives of the Council will be available to answer questions.

Cllr Terry Neville, cabinet lead for environment and streetscene, says:

"This is a really exciting time for Enfield in which residents can get involved in the early stages of planning and really make an impact on their neighbourhood. Local people will know what the real issues are, and we want to hear from you.

The Council's new online consultation system now provides an easy and convenient way to comment on these consultation reports. To register for the Council's consultation database for the Local Development Framework, please contact the

Council's Planning Policy Team by e-mail [ldf@enfield.gov.uk](mailto:ldf@enfield.gov.uk), or phone 020 8379 1452.

The interactive consultation reports, available for your online comments, can also be seen on the Council's website, which also has text versions available to view, download or print. You can access this by clicking on <http://consultation.limehouse.co.uk/enfield>.

Alternatively, for paper copies of the documents, or for further information, please contact the Planning Policy Team on 020 8379 1452.

Ends

## **Appendix C: List of all respondents - Issues and Options**

### *Government bodies*

- British Waterways
- English Heritage
- Environment Agency
- Enfield Primary Care Trust
- Government Office for London
- Greater London Authority
- Highways Agency
- Learning Skills Council
- Lee Valley Regional Park Authority
- Metropolitan Police
- Network Rail
- Thames Water
- Transport for London

### *Consultants*

- Barton Willmore Planning on behalf of St James Development Ltd
- CGMS on behalf of Hadley Wood Golf Club
- CGMS on behalf of Metropolitan Police Authority
- Cluttons LLP
- Firstplan on behalf of National Grid
- GL Hearn on behalf of Tesco superstores
- GVA Grimley on behalf of LaSalle Investment Management
- Icen Projects on behalf of The Anderson Group
- Peacock & Smith on behalf of Morrison Supermarkets
- Planning Works Ltd on behalf of Lionsgate Properties
- RPS Group
- RPS Group on behalf of Dwyer Asset Management Ltd
- RPS Group on behalf Fairview New Homes
- Tribal MJ on behalf of SERGO

### *Businesses*

- Enfield Business & Retailers Association (x2)
- Enfield Community Empowerment Network (x2)
- Murdoch Associates
- National Farmers Union
- Sainsbury's Superstores
- Standard Life Investments Ltd

### *Community*

- Bush Hill Park Conservation Area Study Group
- Capel Manor College and Gardens
- Chalk Lane Area Residents' Association
- Coombehurst Close Residents' Association
- Enfield Housing Association Forum
- Enfield Lock Conservation Group
- The Enfield Society
- Forty Hill and Bulls Cross Study Group
- Jehovah's Witnesses
- Over 50s Forum (x2)

- Southgate District Civic Trust
- Theatres Trust
- Trent Park Conservation Areas Advisory Committee
- The Woodland Trust
- 9 x individual

*Councils*

- Epping Forest District

## **Appendix D: List of specific and general consultees – Preferred Options**

The following specific and general bodies (as defined by the Town and Country Planning (Local Development) (England) Regulations 2004) were consulted (as well as other bodies) on preferred options:

### *Specific consultation bodies*

- Airwave O2 Limited
- British Gas
- British Telecommunications Plc
- Broxbourne District Council
- Cable & Wireless Plc
- East of England Development Agency
- Ecotricity
- EDF Energy Networks
- English Heritage - London Region
- Environment Agency
- Epping Forest District Council
- Essex County Council
- Good Energy
- Greater London Authority
- Green Energy UK
- Hertfordshire County Council
- Hertsmere Borough Council
- Highways Agency
- Hutchison 3G UK Ltd
- Interoute Communications (UK) Ltd
- London Borough of Barnet
- London Borough of Haringey
- London Borough of Waltham Forest
- London Development Agency
- National Grid
- Natural England
- Network Rail
- NHS London
- Northaw and Cuffley Parish Council
- Npower
- Orange
- O2 PLC
- O2 (UK) Ltd
- Powergen
- Scottish and Southern Electric
- Thames Water Property Services
- Three Valleys Water
- T-Mobile (UK) Ltd
- Utilita
- Virgin Media Limited
- Vodafone Limited
- Waltham Abbey Town Council
- Welwyn Hatfield District Council
- WHP Wilkinson Helsby

### *General consultation bodies*

- Age Concern Enfield
- Borough of Enfield Voluntary Association for the Disabled

- Christian Action Housing
- Community & Environment Project Office Ltd
- Enfield Business & Retailers Association
- Enfield Community Empowerment Network (ECEN)
- Enfield Children & Young Persons Services
- Enfield Disability Action
- Enfield Enterprise Agency
- Enfield Housing Association Forum
- Enfield Parents and Children
- Enfield Racial Equality Council
- Enfield Society
- Enfield Sports Advisory Council
- Enfield Voluntary Action
- Faith Forum
- Federation of Enfield Residents' & Allied Associations (FERAA)
- Greek & Greek Cypriot Community of Enfield
- North London Business
- North London Chamber of Commerce
- Old Enfield Charitable Trust
- One to One (Enfield)
- Over 50s Forum
- Prospects
- Victim Support Enfield

*Other consultation bodies*

- Andrew Stevens Care Ltd
- Arriva London North
- Barnet, Enfield & Haringey Mental Health Trust
- British Waterways- London Region
- Enfield College
- Enfield Primary Care Trust
- Fairview New Homes Limited
- First Capital Connect
- Hertfordshire & Middlesex Wildlife Trust
- Job Centre Plus
- Learning Skills Council
- Lee Valley Regional Park Authority
- Lionsgate Properties
- London Borough of Barking & Dagenham
- London Buses
- London Green Belt Council
- London Travel Watch
- London Wildlife Trust
- Metropolitan Police Service
- Middlesex University
- Murdoch Associates
- North London Waste Authority
- One Railway, later superseded by National Express
- Pension Service
- Transport for London
- The Woodland Trust

## **Appendix E: Copy of press notice – Preferred Options**

**LONDON BOROUGH OF ENFIELD**  
PLANNING AND COMPULSORY PURCHASE ACT 2004  
TOWN AND COUNTRY PLANNING (LOCAL DEVELOPMENT) (ENGLAND) REGULATIONS 2004

### **LOCAL DEVELOPMENT FRAMEWORK**

Notice is hereby given that Enfield's Core Strategy Preferred Options Report has been published for consultation.

### **PROPOSALS MATTERS**

Title: Core Strategy Development Plan Document

Subject matter and area: The Core Strategy sets out the vision, objectives and spatial strategy for the future of the borough and key policies to deliver the strategy. It will cover the following subjects – climate change and environmental protection; housing and people; economic development and enterprise; open and built environment; retailing, leisure and culture; travel and movement. The Core Strategy applies to the whole of the borough.

In accordance with regulation 27 (2) (a) any representations on the Core Strategy Preferred Options may be made within the period from:

**13<sup>th</sup> February – 26<sup>th</sup> March 2008.**

In accordance with regulation 27 (2) (b) representations must be sent to the following address:

Planning Policy Team, London Borough of Enfield  
PO Box 53, Civic Centre  
Silver Street, Enfield, Middx, EN1 3XE Or [ldf@enfield.gov.uk](mailto:ldf@enfield.gov.uk) Or <http://consultation.limehouse.co.uk/enfield>

Any representations may be accompanied by a request to be notified at a specified address that the Core Strategy has been submitted to the Secretary of State for independent examination (under section 20 of the Act) and of the adoption of the Core Strategy.

## Statement of fact

The 'Pre-Submission Proposals Documents' including the Core Strategy Preferred Options Report and supporting documents are available for inspection at:

- The Civic Centre
- The Council's website - [www.enfield.gov.uk/ldf](http://www.enfield.gov.uk/ldf)
- Each of Enfield's libraries

The location and opening times of these venues follow:

**Civic Centre** (Environment Direct)  
Silver Street, Enfield,  
Middx, EN1 3XE  
Monday- Friday- 8.30am-  
5.00pm

**Central Library** (Reference Section)  
Cecil Road, Enfield  
EN2 6TW  
Monday- 9.00am- 8.00pm  
Tuesday- 9.00am- 8.00pm  
Wednesday- 9.00am- 5.00pm  
Thursday- 9.00am- 8.00pm  
Friday- 9.00am- 5.30pm  
Saturday- 9.00am- 5.00pm  
Sunday- 2.00pm- 5.00pm

**Oakwood Library**  
185-187 Bramley Road, Enfield  
N14 4XA  
Monday- 9.30am- 6.30pm  
Tuesday- 9.30am- 6.30pm  
Wednesday- 9.30am- 6.30pm  
Thursday- 9.30am- 6.30pm  
Friday- 9.30am- 6.30pm  
Saturday- 9.00am- 5.30pm  
Sunday- Closed

**Ridge Avenue Library**  
Ridge Avenue, London  
N21 2RH  
Monday- 9.00am- 8.00pm  
Tuesday- 9.00am- 8.00pm  
Wednesday- Closed  
Thursday- 9.00am-8.00pm  
Friday- 9.00am- 5.30pm  
Saturday- 9.00am-5.00pm  
Sunday- Closed

**Bowes Road Library**  
Bowes Road, London  
N11 1BD  
Monday- Closed  
Tuesday- 2- 7pm  
Wednesday- Closed  
Thursday- 2-7pm  
Friday- Closed  
Saturday- 9am- 5pm  
Sunday- Closed

**Edmonton Green Library**  
(Reference Section)  
36-44 South Mall  
Edmonton Green, London  
N9 OTN  
Monday- 9.00am- 7.00pm  
Tuesday- 9.00am- 7.00pm  
Wednesday- 9.00am- 7.00pm  
Thursday- 9.00am- 7.00pm  
Friday- 9.00am- 5.30pm  
Saturday- 9.00am- 5.00pm  
Sunday- Closed

**Ordnance Road Library**  
645 Hertford Road, Enfield  
EN3 6ND  
Monday- 9.00am- 8.00pm  
Tuesday- 9.00am- 8.00pm  
Wednesday- Closed  
Thursday- 9.00am- 8.00pm  
Friday- 9.00am- 5.30pm  
Saturday- 9.00am- 5.00pm  
Sunday- Closed

**Southgate Circus Library**  
High Street, London  
N14 6BP  
Monday- 9.00am- 7.00pm  
Tuesday- 9.00am- 8.00pm  
Wednesday- Closed  
Thursday- 9.00am- 7.00pm  
Friday- 9.00am-5.30pm  
Saturday- 9.00am- 5.00pm  
Sunday- Closed

**Bullsmoor Library**  
Kempe Road, Enfield  
EN1 4QS  
Monday- Closed  
Tuesday- 9.30am- 12.30pm,  
3.00pm-7pm  
Wednesday- Closed  
Thursday- 9.30am- 12.30pm,  
3.00pm-7pm  
Friday- Closed  
Saturday- 9.30- 12.30  
Sunday- Closed

**Enfield Highway Library**  
258 Hertford Road, Enfield  
EN3 5BN  
Monday- 9.00am- 7.00pm  
Tuesday- 9.00am- 5.00pm  
Wednesday- Closed  
Thursday- 9.00- 7.00pm  
Friday- Closed  
Saturday- 9.00am- 5.00pm  
Sunday- Closed

**Palmers Green Library**  
(Reference Section)  
Broomfield Lane, London  
N13 4EY  
Monday- 9.00am- 8.00pm  
Tuesday- 9.00am- 8.00pm  
Wednesday- Closed  
Thursday- 9.00am- 8.00pm  
Friday- 9.00am- 5.30pm  
Saturday- 9.00am- 5.00pm  
Sunday- Closed

**Weir Hall Library**  
Millfield Arts Complex  
Silver Street, N18 1PJ  
Monday- 9.00am-7.00pm  
Tuesday- Closed  
Wednesday-9.00am- 7.00pm  
Thursday- Closed  
Friday- 9.00am-5.00pm  
Saturday- 9.00am-5.00pm  
Sunday- Closed

**Bush Hill Park Library**  
Agricola Place, Enfield  
EN1 1DW  
Monday- Closed  
Tuesday- 9am- 7pm  
Wednesday- Closed  
Thursday- 9am- 7pm  
Friday- 9.00am- 5.00pm  
Saturday- 9.00am- 5.00pm  
Sunday- Closed

**Ponders End Library**  
College Court  
High Street, Enfield  
EN3 4EY  
Monday- Closed  
Tuesday- 9.00am-7.00pm  
Wednesday- 09.00am- 7.00pm  
Thursday- Closed  
Friday- 9.00am- 5.00pm  
Saturday- 9.00am- 5.00pm  
Sunday- Closed

**Winchmore Hill Library**  
Green Lanes, London  
N21 3AP  
Monday- Closed  
Tuesday- 9.00am- 7.00pm  
Wednesday- 9.00am- 5.00pm  
Thursday- 9.00am- 7.00pm  
Friday- Closed  
Saturday- 9.00am- 5.00pm  
Sunday- Closed

## **Appendix F: List of respondents – Preferred Options**

### *Government bodies*

- British Waterways
- English Heritage
- Environment Agency
- Enfield Primary Care Trust
- Government Office for London
- Greater London Authority
- Highways Agency
- Learning Skills Council
- Lee Valley Regional Park Authority
- Natural England
- Network Rail
- Thames Water
- North London Strategic Alliance

### *Consultants*

- CGMS on behalf of Fairview New Homes
- CGMS on behalf of Hadley Wood Golf Club
- CGMS on behalf of Metropolitan Police Authority
- CGMS on behalf of Middlesex University
- Drivers Jonas on behalf of London Fire and Emergency Planning Authority
- DTZ on behalf of St Modwen
- Firstplan on behalf of National Grid Property Holdings
- GL Hearn on behalf of Hadley Homes
- GL Hearn on behalf of Tesco superstores
- GVA Grimley on behalf of LaSalle Investment Management
- Peacock & Smith on behalf of Morrison Supermarkets
- Planning Potential on behalf of Diocese of London
- Planning Potential on behalf of Kier Property Developments and the Ponders End Trust
- Planning Works Ltd on behalf of Lionsgate Properties
- RPS Group
- RPS Group on behalf of Dwyer Asset Management Ltd

### *Businesses*

- Enterprise Enfield
- Fairview New Homes (individual submission)
- Home Builders Federation
- Sainsbury's Superstores

### *Community*

- Coombehurst Close Residents' Association
- Enfield Housing Association Forum
- The Enfield Society
- Housing Associations (various, one response)
- Jehovah's Witnesses
- Leonard Cheshire Disability
- O'Bay Community Trust
- Theatre Trust
- 1 x individual

### *Councils*

- Haringey
- Waltham Forest

## **Appendix G: List of respondents – Strategic Growth Areas**

### *Government bodies*

- British Waterways
- The Coal Authority
- English Heritage
- Environment Agency
- Government Office for London
- Greater London Authority
- Haringey Teaching Primary Care Trust
- Highways Agency
- Metropolitan Police – Enfield
- Natural England
- North London Waste Authority
- Thames Water
- Transport for London

### *Consultants*

- Atis Real on behalf of Royal Mail Group
- CGMS on behalf of Middlesex University
- Firstplan on behalf of National Grid
- GVA Grimley on behalf of La Salle Investment Management
- Planning Works on behalf of Lionsgate Properties
- Savills on behalf of Legal and General (and incorporating the views of National Grid, represented by Montagu Evans)
- Savills on behalf of Tottenham Hotspur Football Club
- Tribal MJ on behalf of SEGRO Plc

### *Community*

- Fair Share Ponders End
- Jehovah's Witnesses
- O'Bay Community Trust/ BME ESP Board Representative
- The Ramblers (Hertfordshire and N Middx' Area)
- Southgate District Civic Trust
- Theatre Trust
- 5 x individuals

### *Councils*

- Barnet
- Broxbourne – no comments
- Haringey
- Waltham Forest

### *Other*

- Kier Property Developments (LH)
- Sita UK (Recycling and Waste Management)

## Other formats

If you need this document in another format, please tick the relevant box and return to the address shown stating your name, address and telephone number in the space provided.

Large print

Braille

CD

Tape

Language

Please specify:

Your name:

Address:



Please return this form to: Planning Policy Projects & Design  
Enfield Council  
FREEPOST NW5036  
PO Box 53  
Civic Centre  
Silver Street  
Enfield  
EN1 3XE



**For further details:**  
Planning Policy Projects & Design  
Enfield Council  
FREEPOST NW5036  
PO Box 53  
Civic Centre  
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