



Report to London Borough of Enfield

by Ian Broyd MRICS Dip TP

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

The Planning Inspectorate
Temple Quay House
2 The Square
Temple Quay
Bristol BS1 6PN
☎ 0117 372 8000

20 September 2010

PLANNING AND COMPULSORY PURCHASE ACT 2004
SECTION 20

**REPORT ON THE EXAMINATION INTO THE LONDON BOROUGH
OF**

ENFIELD CORE STRATEGY

DEVELOPMENT PLAN DOCUMENT

Document submitted for examination on 16 March 2010

Examination hearings held on 29 June and 8 July 2010

File Ref: LDF 000738

ABBREVIATIONS

AAP	Area Action Plan
AQMA	Air Quality Management Area
BD	Background Document
CIL	Community Infrastructure Levy
CS	Core Strategy
CSSD	Core Strategy Submission Document
DPD	Development Plan Document
EB	Evidence Base (Document)
FMC	Further Minor Change
GLA	Greater London Authority
GOL	Government Office for London
ha	Hectares
IDP	Infrastructure Delivery Plan
LB	London Borough
LBE	London Borough of Enfield
LP	London Plan
LPA	Local Planning Authority
LSIS	Locally Significant Industrial Site
LVRP	Lee Valley Regional Park
MDS	Major Development Site
NGAP	Northern Gateway Access Package
NLSA	North London Strategic Alliance
NMP	National Minerals Policy
pdl	Previous developed land
PMC	Proposed Minor Change
PPG	Planning Policy Guidance
PPS	Planning Policy Statement
s	Section
SAC	Special Areas of Conservation
SCI	Statement of Community Involvement
SIL	Strategic Industrial Location
SPA	Special Protection Area
SPD	Supplementary Planning Document
SSSI	Site of Special Scientific Interest
TfL	Transport for London
UDP	Unitary Development Plan
ULVOA	Upper Lee Valley Opportunity Area

Non-technical Summary

This report concludes that the Enfield Core Strategy provides an appropriate basis for planning of the borough over the next 15 years. The Council has sufficient evidence to support the strategy and can show that it has a reasonable chance of being delivered.

I have found no need to make any recommendations that require changes to the Core Strategy relating to its soundness. Other changes, which I endorse, are of a minor nature and are based on suggestions put forward by the Council either in response to points raised by participants or for purposes of clarity, factual correction, consistency, correcting typographical errors or to improve referencing/signposting within the document. They do not alter the essential thrust of the Council's overall strategy.

LEGAL REQUIREMENTS	
Local Development Scheme (LDS)	The Core Strategy DPD is identified within the Council's Local Development Scheme 2010-2012 (BD-02). The Local Development Scheme was brought into effect in March 2010. There, the Core Strategy DPD is shown as having a submission date of February 2010. The Core Strategy is compliant with the LDS.
Statement of Community Involvement (SCI) and relevant regulations	The Council's Statement of Community Involvement (SCI) (BD-04) has been found sound by the Secretary of State and was formally adopted by the Council in June 2006. The Council has met the requirements set out in the Regulations, including Regulation 30(1)(d) and 30(1)(e) Statements (CSSD-06) and its Self Assessment of Soundness (CSSD-07).
Sustainability Appraisal (SA)	Alongside the preparation of the DPD the Council has carried out a parallel process of sustainability appraisal (CSSD-04). It has been independently verified and is adequate.
Appropriate Assessment	In accordance with the Habitats Directive, an Appropriate Assessment has been undertaken (EB-12). It confirms that there would be no significant harm to the conservation of the SACs, SPAs and European sites that lie either within Enfield or neighbouring districts.
National Policy	The Core Strategy complies with national policy.
Sustainable Community Strategy (SCS)	Satisfactory regard has been paid to the SCS (BD-10).
2004 Act & Regulations	The Core Strategy complies with the Act and the Regulations.

1 Introduction and Overall Conclusion

- 1.1 Under the terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004, the purpose of the independent examination of a development plan document (DPD) is to determine:
 - (a) whether it satisfies the requirements of s19 and s24(1) of the 2004 Act, the regulations under s17(7), and any regulations under s36 relating to the preparation of the document; and
 - (b) whether it is sound.
- 1.2 This report contains my assessment of the London Borough of Enfield Core Strategy DPD in terms of the above matters, along with my recommendations and the reasons for them, as required by s20(7) of the 2004 Act.
- 1.3 Appendix A to my report contains a number of minor changes suggested by the Council. The changes are in 2 parts. The first schedule was produced by the Council following publication of the pre-submission Core Strategy DPD (Schedule of Minor Changes CSSD-08)). The second, comprises changes suggested by the Council during the examination (Further Minor Changes (CSSD-11)). Both sets of changes have been suggested by the Council to improve the document and do not affect the soundness of the Plan. As they do not affect the soundness of the plan they are not dealt with in this report, but they are endorsed in the light of the Council's wish to include them.
- 1.4 I am satisfied that the DPD meets the requirements of the Act and Regulations. My role is also to consider the soundness of the submitted Core Strategy against the advice set out in Planning Policy Statement 12 (PPS12) paragraphs 4.51-4.52. In line with national policy, the starting point for the examination is the assumption that the local authority has submitted what it considers to be a sound plan. My overall conclusion is that the Core Strategy DPD is sound.

2 General & Background

- 2.1 The DPD begins by providing the national, regional and local policy context to the Council's Core Strategy. It then goes on to confirm Enfield's strategic objectives. It then outlines the borough's spatial strategy the main thrust of which is to focus future growth and development on 4 strategic growth areas located in Central Leaside, North East Enfield, Enfield Town and the area around the North Circular Road at New Southgate. The DPD contains 46 policies and is some 236 pages long of which 67 pages comprise appendices. The policies are arranged in sections dealing with housing, economic development, physical infrastructure, environmental protection and green infrastructure, place making and implementation and monitoring.

- 2.2 **Please note that the numbering and coverage of the issues I deal with in the report do not follow the issues for examination that I listed at my Pre-Hearing Meeting (Pre-Hearing Meeting Notes, 12 May 2010). To avoid repetition and to deal succinctly with what I regard as the key issues, I have combined some issues and excluded others where I do not see them addressing the basic soundness of the CS or where the Council has dealt with them through a proposed minor change to the CS.**

3 Assessment of Soundness

- 3.1 ***Issue 1 – Whether the CS represents an effective holistic document in accordance with PPS12 guidance.***
- 3.2 The CS has been prepared fully in accord with the guidance laid down in PPS12. The strategy and policies are based on a substantial and focused evidence base that is both robust and credible. The strategy timeline of 15 to 20 years exceeds that laid down in PPS12 (paragraph 4.13). Deliverability is set out in an Infrastructure Delivery Programme. The CS policies have been written to allow for changing circumstances to provide flexibility and monitoring will be carried out through an extensive list of measurable actions/indicators against defined targets where appropriate (CS, Section 10.3). I find the CS is sound, being justified, flexible and consistent with national policy and in conformity with the London Plan.

- 3.3 ***Issue 2 – Whether the regeneration schemes proposed for the 4 strategic growth areas are deliverable and viable.***
- 3.4 The Core Strategy (CS) proposes an impressive range of regeneration schemes to provide for a substantial increase in homes (11,000+ units) and jobs (6,000+). This order of growth will require additional infrastructure and community services to improve and support the existing and proposed increase in population over the period of the plan (2010/2011 to 2024/2025). Much of the new development is proposed to the south and on the eastern side of the district on previously developed land (pdl) often within Flood Zones 2 and 3. The CS acknowledges that flood risk presents a major challenge (paragraph 8.3).
- 3.5 The development of pdl could involve the prospect of having to deal with pollution on land formerly used for utilities, the cost of contributions towards flood defence/mitigation as well as other infrastructure and social infrastructure including affordable housing

and new schools. Given these factors, I posed the following questions of the Council: how it rated its prospects of delivering the strategy's planned development in the early years of the plan in the present depressed state of the economy? Whether there was evidence of current developer interest in developing in the district as a whole; and, if yes, whether that interest extends to those regeneration schemes planned for the early years of the plan?

- 3.6 The Council acknowledges that, in the current economic climate, the biggest risk to the delivery of development in the early (5 years) plan period is the recovery of the construction and house building industry (LBE/Issue 1). The CS envisages a minimum of a 15 year plan. The current uncertainty is not addressed in policy wording as economic cycles dictate that recovery is possible within the plan period. To provide certainty in delivering its objectives in the early period the Council has sought to profile schemes and establish a sound planning framework that will help create the conditions to attract capital investment and allow the Council to steer investment in ways to secure delivery.
- 3.7 Accordingly, it has phased development in the early years to progress developments which take a strong public sector lead. In the medium to long term, where delivery would be more dependent on private land interests and economic conditions, the Council, through a series of public partnerships and investment, is working to provide greater confidence by investing in master planning and viability work that will investigate the key challenges of the borough's pdl sites.
- 3.8 The evidence base to support the CS recognises the cumulative implications of development within the borough and in neighbouring boroughs. It has produced an Infrastructure Delivery Plan (IDP) (CSSD-10); it has engaged widely with statutory consultees and other partners in drawing up its strategy which is supported by its borough wide Transport Assessment (EB-18a). It will be contributing to the forthcoming Upper Lee Valley Transport Study that will be key to unlocking the potential for change in the Upper Lee Valley. It is confident that the challenges to its development proposals represented by the risk of flooding will be surmountable by adopting PPS25's sequential approach.
- 3.9 Although key sites within the overall regeneration and development package proposed in the strategy are wholly, or partly, within Flood Zones 2 or 3, I am satisfied that their development/redevelopment will be undertaken in such a way as to accord with PPS25 policies and thereby reduce the risk of flooding to acceptable levels in line with EA advice.

Whether CS regeneration proposals are currently showing active developer interest?

- 3.10 The Council confirms that it is taking a proactive role in the delivery of Place Shaping in the borough. Despite the current recession developer interest is strong in many parts of the borough which coupled with public sector investment will ensure delivery of regeneration programmes.
- 3.11 The Council lists schemes within **Meridian Water, Angel Edmonton, Enfield Town** and the **North Circular Road** where substantial development is under way or where there is active developer interest much of it on Council owned land. In addition, at **Ponders End** and **South Brimsdown**, three key development areas are identified at **Ponders End Central, Ponders End South Street Campus** and **Ponders End Waterfront**. Of 5 sites earmarked for development and following viability assessments, only one, (South Brimsdown) is regarded as likely to require public sector intervention.
- 3.12 The Infrastructure Delivery Plan outlines the proposed infrastructure to be delivered within the plan period. Infrastructure Schedule A4.1-A49 sets out the proposed infrastructure to be included in the Strategic Growth Areas where the majority of the housing and employment is to be concentrated. A Planning Contributions & Community Infrastructure Levy Supplementary Planning Document (SPD) is to be produced in 2011. A key consideration of the SPD will be that any proposed levy should not inhibit development in the borough.

Conclusions on Issue 2

- 3.13 Notwithstanding the effects of the current economic recession, I consider that the Place Shaping Priority Areas proposals for both the early years and for the remainder of the plan period are flexible, viable and deliverable and that the CS is sound.

* * *

- 3.14 ***Issue 3 – Whether Core Policy 1 is effective and justified in focusing strategic growth on the 4 areas identified.***
- 3.15 The Council's approach to focusing growth on 4 Strategic Growth Areas is founded on what I accept is an extensive robust and credible evidence base. The strategy is consistent with the London Plan (LP) and will seek to address the disparities across the borough that are evident in health, wealth, education attainment and environmental attainment by concentrating development in those areas where the levels of deprivation and need are greatest. It has been accepted as providing the most appropriate strategy when considered against reasonable alternatives. As already discussed under issue 2 I find the strategy is deliverable and flexible given the

constraints on development imposed by the current economic conditions. The strategy is capable of being monitored and Section 10.3 of the CS provides for that to be done. I find Core Policy 1 is sound in basing its strategy on the 4 Strategic Growth Areas.

- 3.16 ***Issue 4 - Whether the amount of housing proposed in Core Policy 2 (Housing Supply & Locations for New Homes) can be provided in the Strategic Growth Areas; whether the quantum of housing proposed is based on a robust, credible and transparent evidence base; whether alternative delivery locations other than the Strategic Growth Areas need to be identified.***
- 3.17 Core Policy 2 of the CS plans to provide for some 11,000 new homes (some 730 units pa) in the 15 year period 2010/11 to 2024/25. This is well in excess of the 3,950 (395 pa) ten year target in the current LP. It also comfortably exceeds the increased target of 5,600 units (560 pa) proposed for the ten year period 2011/12 to 2021/22 in the emerging draft Replacement LP. The breakdown provided in Core Policy 2 shows where the new housing will be located. Of the indicative target of 2,690 units for the first 5 years of the plan, the 4 Strategic Growth Areas would provide some 37%, other large sites some 18% and small sites some 45%. The evidence base includes the Enfield Housing Trajectory Justification Report 2009 (EB-03) and the GLA's Strategic Housing Land Availability Assessment & Housing Capacity Study 2009 (EB-21A). These support the attainability of the CS's housing proposals.
- 3.18 Further detailed justification for its approach to achieving its housing targets is provided by the Council in its paper LBE/Issue 11 and in evidence provided in its rebuttal of a respondent's assertion that a number of sites included in its Housing Trajectory Justification Report were not deliverable.
- 3.19 I am satisfied that the quantum of housing proposed in the Strategic Growth Areas is deliverable over the period of the plan and, even in the early years when economic conditions are likely to prove difficult, all reasonable measures are being undertaken by the Council to ensure that delivery will stay on target (see Issue 2 above). The Council's housing evidence and its further elaboration of that evidence set out in LBE/Issue 11 paper have not been seriously challenged. I find that the strategy's indicative housing supply figures and the proposed locations, set out in Core Policy 2 are sound.
- 3.20 The CS's housing allocations are so far in excess of the LP requirement both in the current and emerging Replacement LP that I see no reason or justification for the CS to identify alternative locations for the provision of housing in the borough.

- 3.21 The CS is sound with regard to the proposed location of housing, the quantum proposed, its anticipated delivery and the evidence base on which these matters are founded.

- 3.22 ***Issue 5 - Whether in order to be effective Core Policy 5 (Housing Types) needs to confirm that new housing types and sizes will need to be updated to reflect the findings of Strategic Housing Market Assessments (SHMAs) & Local Market Assessments (LMAs) when reviewed.***

- 3.23 The policy reflects the present under-provision of particular types of housing. The forthcoming Development Management DPD will set out arrangements for its application on a site by site basis. The policy will be applied flexibly in recognition that the housing mix recommended will not be appropriate on some sites. The policy will be kept under review as part of the Council's monitoring systems. If that process suggests that the policy's housing mix does not reflect needs as and when SHMAs or LMAs are undertaken, the policy will be reviewed. No change is required. The policy is effective and sound as drafted.

- 3.24 ***Issue 6 – Whether the Council is aware of the proportion of pdl sites identified in the Housing Trajectory Justification Report 2009 (EB-03) that would be regarded as having “abnormal” site conditions that would affect delivery of affordably housing.***

- 3.25 As already mentioned, some 37% of the CS's housing supply, in the first 5 years of the plan, would be located in the 4 Strategic Growth Areas. The Council confirmed (Hearing Agenda Issue Paper LBE/Issue 12A) that, of the sites identified in the Enfield Housing Trajectory Justification Report 2009 (EB-03), 26 sites covering 71 ha (out of 70 sites covering some 106 ha) are located within flood risk areas and/or are potentially contaminated due to historic land use. However, 5 of these sites are under construction and therefore provide confidence that, in spite of potential constraints, development continues to be viable enough to proceed.

- 3.26 Of the remaining 21 sites, the biggest contributors are 2 sites totalling 41.3 ha. These are made up of land around IKEA and Tesco N18 in Central Leaside (19 ha) and North Circular Road (from Bounds Green Road to Callard Avenue) (22.31 ha). Only a small part of that area falls in a flood zone. The Council's paper LBE/Issue 12A provided sufficiently convincing evidence to persuade me that the incidence of “abnormal” costs would not significantly affect the delivery of affordable housing in the early, or later, years of the plan period.

- 3.27 The Council has agreed a 3 year target with the GLA to deliver 648 affordable homes (2008/9 to 2010/11). The Council's assessment that these are deliverable because there are enough schemes in the affordable housing programme is not disputed. For the early years, the Council identifies 8 large and 2 small sites that are shown to be deliverable, with affordable housing and are scheduled for completion in the first five years of the plan.

- 3.28 ***Issue 7 – Whether the CS should be considered independently of the Infrastructure Delivery Plan (IDP); whether Core Policy 1 should make reference to the IDP.***

- 3.29 The IDP (CSSD-10) forms part of the evidence base. It has been produced in accordance with paragraph 4.8 of PPS12 and sets out the additional infrastructure that will be required to support the planned levels of growth within the 4 Strategic Growth Areas. The CS cannot be considered separately from the evidence base. A minor change is proposed (FMC12) to clarify the link between the strategic growth areas and their infrastructure requirements contained in the IDP. I find the CS is sound in this respect and consistent with PPS12 guidance.

- 3.30 ***Issue 8 – (i) Whether the CS spatial strategy and proposed infrastructure framework will be effective in retaining businesses and attracting new.***
- (ii) Whether the CS proposals to safeguard employment land are justified; and***
- (iii) Whether the boundaries of the safeguarded employment areas are appropriately drawn in relation to: Harbet Road Industrial Estate/Meridian Water; Commercial Road and New Southgate Industrial Estates.***
- (iv) Whether Core Policy 37 is unsound because it does not specifically support the continued use of the Eco Park site for waste management purposes.***

(i) The spatial strategy

- 3.31 The borough contains a significant proportion of London's stock of employment land. Core Policy 13 seeks to protect and improve Enfield's employment offer by helping to facilitate the creation of at least 6,000 new jobs over the period of the plan (4,000 + jobs in

the Upper Lee Valley and another 2,000 + in town centres and other Place Shaping Priority Areas).

- 3.32 The Enfield Employment Land Study 2006 (EB-07) and its review (Enfield Employment Land Update 2009 (EB-08)) underpin the Council's employment strategy. Following those studies, the Council has reviewed and rationalised its employment land bank with the objective of protecting, promoting and growing the local economy and safeguarding jobs while exploiting under-used and vacant land through regeneration in its Place Shaping Priority Areas. In my judgement the strategy represents a balanced approach in promoting urgently needed regeneration while retaining, for the most part, its strategic and locally important employment areas. The CS therefore sets a framework that should help to retain existing businesses while attracting new and modern ones to its existing employment areas and those areas identified for mixed development.

(ii) **Whether proposals to safeguard employment land are justified**

- 3.33 Core Policy 14 will safeguard 11 sites totalling some 309 ha identified under the London Plan (LP) as strategically important Strategic Industrial Locations (SILs). In addition, Core Policy 15 will safeguard some 31.9 ha of employment land on 9, Locally Significant Industrial Sites (LSISs). Land at Meridian Water (some 23 ha) and south Brimsdown (3 ha), at present identified indicatively as SIL, will be used to aid regeneration of 2 of the Strategic Growth Areas at Central Leaside and Ponders End (part of North East Enfield). Also in order to support regeneration, some 3.4 ha of LSIS land presently used for employment purposes will be developed for mixed uses.
- 3.34 This package is supported by the GLA which is concerned to ensure that strategic employment land is used sustainably and will be sufficient to meet London's planned economic and population growth. To this end the GLA identifies Enfield as a borough where limited transfer of industrial sites would be acceptable (GLA-Supplementary Planning Guidance - Industrial Capacity 2004). The loss of 26 ha of SIL to mixed development will be more than compensated for by designating an additional 60 ha of employment land as SIL resulting in a net gain of about 33 ha. New SIL designations will be made at Innova Park (about 26 ha), Aztec 406 (18 ha) and Edmonton Eco Park (16 ha).
- 3.35 Notwithstanding the proposed loss of 26 ha of SIL land, it is intended that, on redevelopment, a substantial element of modern employment floorspace at least equivalent to existing employment floorspace will be provided to meet the needs of local businesses. The same requirement is to be applied where land previously identified as LSIS is to be used to support regeneration. In the

circumstances I find that the measures proposed in the CS to safeguard employment land are sound.

(iii) Whether the boundaries of employment areas are appropriately drawn.

- 3.36 Criticism is made in respect of 3 existing employment areas. Under the employment strategy, Harbet Road Estate is to remain as a SIL site and Commercial Road Estate is to continue to be protected as a LSIS. A third, New Southgate, another LSIS, is to be partly redeveloped to aid regeneration of an adjoining housing estate.

Harbet Road Industrial Estate/Meridian Water

- 3.37 This estate forms part of a collection of employment sites to the south of the North Circular Road known collectively as Meridian Water, which in turn is within the wider employment area of Central Leaside. To the west of the canal Meridian Water is dominated by gas holders, 2 large retail stores (Ikea & Tesco), their car parks and vacant land. Harbet Road Estate, at some 18 ha, makes up the eastern part of the group and is separated from it by the canalised River Lee Navigation. It is more intensively developed than the central area.
- 3.38 The Harbet Road estate contains some 200 businesses providing an estimated 1,500 jobs. The Stonehill Estate makes up about half of the total area of the Harbet Road complex and approximately a third of its floorspace of the Stonehill part is vacant, much of it related to a single property. The land owner argues that the whole of the Harbet Road Estate should be de-designated from SIL and included in the mixed use regeneration of Meridian Water.
- 3.39 Harbet Road Estate makes a significant contribution to the local job market. Although the estate is well related to the strategic road network it is not as accessible in terms of public transport as the land to the west nor is it as well located to existing residential areas. It has a large number of ownerships and there is no guarantee that all landowners would wish to go down the mixed development route. While its premises command lower rents than better appointed estates elsewhere, it provides a variety of business premises that can continue to be attractive to small and medium sized businesses. Release of Stonehill Estate alone could create a relatively small pocket of residential use isolated from essential infrastructure such as schools.
- 3.40 Moreover, the land to the west represents a large and substantially under-used resource. It has the advantage of being in a small number of ownerships. The scale of development envisaged for the core of Central Leaside would support community and transport infrastructure that is required for the new community and improve that for existing residents in an area of high unemployment and deprivation. Furthermore, if public funding is constrained over the

early years of the plan, as is probable, concentrating redevelopment resources on the 23 ha central core is likely to be more successful than would be the case if it had to be spread more widely to embrace the less accessible Harbet Road area.

- 3.41 In contrast to Harbet Road, the 3 ha of land to the south of Brimsdown proposed for mixed development is under-used as a strategic industrial location. Moreover, that area is well located to take advantage of existing and proposed infrastructure and regeneration funding due to it being well related to public transport services. The 2 areas do not bear comparison in terms of accessibility, size, relationship to residential hinterland or the contribution each makes to the local business and jobs pool.
- 3.42 Core Policy 38 (Meridian Water) lays down a number of requirements including community infrastructure (e.g. residential, schools, health, shops and employment) with an indication that employment will occupy 20% of the area with other uses occupying the remainder. The employment use is stated as being set at "no less than 5.5 ha". This is criticised as being too prescriptive. Also criticised, on the grounds that it would stifle development, is the requirement that development should be progressed in tandem with phased improvements to public transport.
- 3.43 A Masterplan is being prepared for the area to test the Council's vision and, "will be flexible with delivery designed to grow and evolve as market and requirements change" (LBE/Issue 20). The Council need to set a framework for future development to guide developers and other stakeholders. With the flexibility promised in the preparation of the Masterplan, the policy will not be overly prescriptive. Nevertheless, a Further Minor Change proposed by the Council (FMC63) will remove the reference in the policy to "no less than 5.5 ha". The 20% indicative figure for revitalised employment uses will remain.
- 3.44 The Council's evidence base supports the tandem provision of public transport improvements. Rather than stifling development the requirement will unlock the regeneration potential of Meridian Water.
- 3.45 The Council acknowledges that the 2 gas holders at Willoughby Lane are still operational. Nevertheless, the means by which decommissioning would be implemented is too detailed a matter for the CS. That aspect would best be dealt with in the forthcoming AAP.
- 3.46 Finally, the package of regeneration proposals has to strike a balance between retaining an essential bank of employment land for existing and future needs while stimulating the investment necessary to achieve that renewal. The strategy strikes the correct balance as drafted. Despite the vacancy level, Harbet Road should

remain and be protected as SIL and as a reserve of employment land for purposes of preparing a Masterplan for Meridian Water.
Commercial Road / North Middlesex Industrial Estate

- 3.47 The estate is identified as a Locally Significant Industrial Site (LSIS). It has an area of about 9.4 ha. The retention of the northern part, representing about a third of the whole estate, is criticised because of the presence of vacant premises within this block. A narrow strip of land on the east side of Commercial Road was effectively removed from employment use in 1995 by the grant of planning permission for residential development; although that permission was never taken up. That strip is proposed for deletion from the proposed LSIS designation.
- 3.48 The Enfield Employment Land Study Update (2009) (EB-08) recommends that the estate continue to be safeguarded while being monitored for vacancies, with potential for improvement or redevelopment. The retention of the estate is seen as meeting a demonstrable short term demand for industrial development. It provides lower cost business premises, which contribute to the diversity of the local economy. Provided vacancies on the estate are kept under review as intended by the Council, the boundary of the LSIS designation should remain as proposed in the CS.

New Southgate Industrial Estate

- 3.49 This is a 1.8 ha industrial estate abutting the North Circular Road at the western gateway to the borough. The land is owned by the Council who propose to redevelop the western part (about 1 ha) in conjunction with the Ladderswood housing estate, adjoining to the north. The area is recognised as being one of high deprivation where opportunities will be sought to improve living conditions of residents, visitors and businesses.
- 3.50 The occupiers of a number of the units are concerned that they will be deprived of their business premises if the Council's regeneration proposals are implemented. Moreover, it is argued that the loss of employment land here would be contrary to the Council's commitment to encouraging local businesses and safeguarding jobs.
- 3.51 The Council is of the view that it is necessary to develop part of the industrial estate to achieve a viable and acceptable density on its proposed redevelopment of the adjoining housing estate. The proposal is for a residential led mixed use scheme that would include some 3,000m² of employment floorspace, which would approximate to that to be lost on redevelopment.
- 3.52 Those businesses that cannot be relocated in the replacement commercial floorspace would be assisted by the Council to find alternative premises in the borough. Given the regeneration objectives of the scheme and the intention to replace a similar employment floorspace, the redevelopment of part of this industrial

estate is in line with PPS1 and PPS4 in positively and proactively encouraging sustainable economic growth by prioritising areas with high levels of deprivation for regeneration investment while seeking to make the most effective use of land. I find the proposed revision of the estate's boundary to be justified and Core Policy 15 to be sound.

- 3.53 My conclusions on these issues are firstly that the strategy will provide an effective employment framework that will encourage the retention of existing businesses and attract new and, secondly, that the rationalisation of employment allocations in respect of both SILs and LSISs are justified and sound in terms of the totality of the allocation and their definition on the Proposals Map.

(iv) Eco Park

- 3.54 Core Policy 14 (Safeguarding Strategic Employment Locations) confirms the protection of the Eco Park site at Edmonton as a SIL. Core Policy 22 safeguards existing waste management sites and a minor change (FMC61) to Core Policy 37 refers to the LPA's support of waste management on this site. The policy was not unsound as originally drafted, but a minor change proposed by the Council will help address North London Waste Authority's concerns.

- 3.55 ***Issue 9 – Whether the CS is unsound because it fails to adequately address the value of having the Lee Valley Regional Park (LVRP) so close to some of the most deprived communities in London.***

- 3.56 The CS acknowledges the value of the LVRP as a unique swathe of public open space, part of which is located in the borough, and which provides opportunities for sport and recreation on the doorstep of some of the most deprived areas of London. The spatial vision (CS, page 27), strategic objective 9 (page 30) and spatial strategy (page 33) all demonstrate a clear commitment to realising the potential and enhancing the value of the LVRP. Moreover, Core Policy 35 relates specifically to the LVRP and Waterways and confirms the intention to support the work of the key stakeholders in improving access to the park and in realising its potential. Core Policy 34 recognises the existing open space deficiencies in Upper Lee Valley and, in the light of the strategic growth proposed there, seeks to capitalise on the unique opportunities represented by the park to benefit the wider community. I find that the CS goes as far as it reasonably can in addressing the relationship of the LVRP to deprived communities and is sound in this regard.

- 3.57 ***Issue 10 - Whether the Core Policy 33 proposes the most appropriate strategy for Pickett's Lock.***
- 3.58 Pickett's Lock is a rectangular shaped parcel of predominantly open land, some 58 ha in area, located within the LVRP. The site is shown on the Proposals Map as a Major Development Site (MDS) in the Green Belt. The buildings, which include a cinema, Bowls Hall and Athletics Centre, occupy the south western part of the site and cover about 1.6 ha. About 3.75 ha of hardstanding provide car parking for the covered facilities. The built development represents a small proportion (2.8%) of the site identified as a MDS.
- 3.59 The Park Authority seeks to have an area totalling some 13.62 ha around the built-up part of the site excluded from the Green Belt in order to encourage and attract the development of commercial leisure activities onto the site.
- 3.60 In the absence of an adopted planning brief/master plan for the MDS it would not be appropriate to remove such a large area of land from the Green Belt merely based on the Park Authority's aspirations, particularly as those aspirations might well impact adversely on the Green Belt of which the site forms part. The Park Authority's intentions are based on a speculative ambition for the site that may or may not produce the facilities that it seeks to encourage. At present the site forms an important and integral function within the park and the Green Belt by virtue of its predominantly open character. The Council's decision to propose the site as a MDS accords with PPG2 (Annex C) and recognises the partially built-up character of the site. The CS need go no further in that recognition. Core Policy 33 is sound in its treatment of this site in the Green Belt.

- 3.61 ***Issue 11 - Whether the issue of gravel extraction at King George V reservoir is represented as an appropriate strategy in the CS.***
- 3.62 Core Policy 23 states that the Council will work with its partners including the London Aggregates Working Party to identify potential sources of aggregates in the borough. The only known potential source of aggregates in the borough is that located beneath the King George V reservoir within the LVRP. The reservoir is owned by Thames Water. The extent of any aggregate deposit is not known nor whether it has any commercial value. The reservoir is a Site of Special Scientific Interest (SSSI).
- 3.63 The Park Authority regards the identification of the reservoir site as a potential aggregate source as being in conflict with its SSSI designation and the park's function as an important regional open space.

- 3.64 National Minerals Policy 1-Planning and Minerals (NMP1) (2006) at paragraphs 9 and 13 requires the safeguarding of minerals as a national objective and in Local Development Documents. However, where non-major mineral development would be involved, paragraph 14 of the guidance states that permission would not normally be granted for mineral extraction in SSSIs. Policy 4A.31 of the London Plan (LP) requires DPD's to identify and safeguard aggregate resources suitable for extraction.
- 3.65 In this case there is no certainty that the reservoir overlays a commercially workable reserve that would justify identification under the LP. Nor is it known whether any reserve would rate as a major mineral development in terms of NMP1. Moreover, if a commercial reserve were shown to exist, and it was judged not to be a major development it would be unlikely, according to national policy guidance, to be granted permission because of its SSSI status. In my view the CS is not unsound in identifying a potential reserve of aggregates. The reasoned justification explains that environmental constraints would be a major consideration. I see no objection to the CS acknowledging the existence of a potential aggregate source. NMP1 provides adequate protection to the SSSI and the LVRP. Accordingly, I find the CS sound.

- 3.66 ***Issue 12 - Whether the CS is sound in making reference to the North Gateway Access Package (NGAP), a transport proposal that is, at present, uncertain as to its feasibility and acceptability.***
- 3.67 Core Policy 24 (The Road Network) states that the Council will work with partners to continue to consider the potential merits, benefits and impacts of a Northern Gateway Access Package to improve accessibility and movements within north east Enfield and to support existing and new businesses in the Upper Lee Valley. The reference to NGAP is criticised because it is uncertain as a proposal and therefore undeliverable.
- 3.68 The policy is doing no more than making reference to a transport aspiration that the Council will be considering together with partners and stakeholders to deal with congestion in this part of north London. The reasoned justification to the policy is clear in stating that NGAP is not a prerequisite to support development proposals in the CS. I see no objection to it being mentioned as an ambition on the part of the Council to deal with traffic conditions in the wider area. The scheme is not referred to as a firm proposal. The reference to NGAP in the policy does not make it unsound.

3.69 ***Issue 13 - Whether the absence of an adopted Area Action Plan (AAP) for the Strategic Growth Areas would delay delivery of housing development.***

3.70 The Council confirms, and this is not disputed, that the housing delivery scheduled for the first 5 years of the plan can be delivered in advance of the adoption of AAPs. Since the delivery of housing in the short term would not be made uncertain by the absence of an adopted AAP I find the strategy sound.

3.71 ***Issue 14 - Whether Core Policy 3 (Affordable Housing) needs to confirm that no site will be required to provide more than 40% affordable housing.***

3.72 Core Policy 3 is framed in accordance with PPS3 and London Plan policy 3A.9 (BD-17). It is sound as drafted.

3.73 ***Issue 15 – Whether Core Policy 12 (Visitors & Tourism) is in conformity with PPS4; whether the requirement regarding public transport accessibility should be removed***

3.74 This policy has been informed by London Plan (LP) policies 3B.9 (Tourism Industry) and 3D.7 (Visitor Accommodation & Facilities). The policies seek to enhance existing facilities and create sustainable new products, particularly in locations outside central London, where good public transport accessibility exists and where they can contribute to suburban and town centre renewal. The CS policy is in conformity with both the LP and the recently updated PPS4-Planning and Economic Growth. Good public transport access and measures to improve such access are integral to Core Policy 12. The support given by the policy to the provision of visitor accommodation in the Upper Lee Valley when accompanied by proposals to improve public transport accessibility (second bullet point) is a key objective of the policy and should not be removed. Schemes that fail in that objective would need to be justified on their merits.

3.75 The expansion of hotels and other facilities outside of suburban town centres, for instance where they are located in the Green Belt, would need to be considered, again on their merits, against national policies, for example PPG2, and policies of the CS. I find the policy sound.

3.76 ***Issue 16- Whether proposals contained in Core Policy 40 (North East Enfield) to provide leisure development at Columbia Wharf would prejudice the commercial viability***

and regeneration of surrounding employment sites; whether expectations are set too high in stating that development will help cross-fund improvements to infrastructure; whether cross-funding references in other policies needs to be linked to Core Policy 46 (Infrastructure Contributions).

- 3.77 The Council is satisfied that with careful attention to design, layout and detailing, the regeneration schemes, which incorporate a mix of uses, including housing and leisure, can be accommodated cheek by jowl with employment uses. It cites a number of examples in other London Boroughs where this has been successfully achieved. I am satisfied that, with the promised attention to layout and design, the components and objectives of this policy are sustainable and sound.
- 3.78 Any cross-funding within policies would need to meet the tests laid down in paragraph B6 of Circular 5/2005 and/or by means of the Community Infrastructure Levy (CIL), should the Council choose to adopt CILs as a means of financing infrastructure. Contributions will always be assessed on a site by site basis taking into account the viability and costs of taking a scheme forward (Core Policy 46- Infrastructure Contributions). The plan should be read as a whole. Individual policies need not repeat a general policy statement appearing in another part of the CS. The policies are sound.

* * *

- 3.79 ***Issue 17 - Whether the provisions to improve air quality along the A406 (North Circular) would be effective and whether air quality would adversely impact on proposals to develop alongside this road.***
- 3.80 The western section of the North Circular is identified as a Strategic Growth Area with potential to accommodate up to 2,000 homes. The Council confirms that the whole of Enfield is an Air Quality Management Area (AQMA) and problems of pollution are particularly marked along major roads. Air quality is a London wide concern. The Mayor and TfL have a key role in improving London's air quality.
- 3.81 The forthcoming North Circular AAP will consider how pollution and its effects can be reduced. The forthcoming Development Management DPD will set criteria for assessing pollution levels and the means of mitigating them. It is intended, through a combination of high quality design, layout, landscaping, use of mechanical ventilation systems and reduced traffic congestion, to reduce the effect of poor air quality on new housing. I would expect these measures to be sufficient to create an acceptable environment for new housing along this road. The policy is sound in meeting what is a difficult London wide condition.

* * *

- 3.82 ***Issue 18 - Whether the place shaping Core Policies 37 (Central Leaside) and 38 (Meridian Water) are unsound because they fail to adequately incorporate provisions to link to other parts of Upper Lee Valley Opportunity Area to maximise benefits between Communities in Enfield and Haringey.***
- 3.83 These policies have been prepared in the context of their location within the Upper Lee Valley Opportunity Area (ULVOA). That fact is not seriously contested. Moreover, in drawing up the policies, the Council is on record as having worked closely with a wide range of partners as it is recognised that the regeneration of Central Leaside and the development of a new community at Meridian Water will act as a catalyst for the wider change needed at both a local and regional level to benefit adjoining communities, including Edmonton in the LB of Enfield and Northumberland Park in the LB of Haringey.
- 3.84 The location and scale of development proposed in these place shaping policies is supported by TfL, the GLA and North London Strategic Alliance (NLSA) and is reflected in the Mayor of London's Draft Upper Lee Valley Opportunity Area Planning Framework and NLSA's Upper Lee Valley Vision (2009). There is no doubt that the policies have been developed, inclusively, within a coordinated strategy that is based on a robust and thorough evidence base and following a comprehensive consultation and testing process.
- 3.85 The implications of potential cross-boundary issues have been addressed in the development of the supporting CS evidence base. Appendix 5 of the CS details adjoining boroughs policies and development plans where relevant to Enfield. The Council confirms that it will continue to engage with adjoining boroughs, TfL, the GLA and other partners in the planning and delivery of housing, infrastructure, and investment in this area of North London.
- 3.86 Criticism was levelled at these policies because they do not sufficiently reflect development aspirations in the LB Haringey and, in particular, a major development proposed at White Hart Lane. The scheme for rebuilding the football stadium includes a new foodstore, hotel, offices, homes and car parking. At the time of writing, the application has yet to be determined. The application will need to be assessed on its merits in the context of the development plan and emerging policies insofar as the latter can be given weight. Enfield's Study of Town Centres Update (2009) (EB-06) analysed retail growth in the borough and specifically assessed the impact with or without proposed retail development at the Tottenham Hotspur FC Stadium which lies outside the borough boundary. Haringey officers will be represented on the Delivery Board that has been established in the preparation of the Master Plan for Meridian Water.

- 3.87 The record suggests that the Council has worked assiduously to ensure that linkages to other parts of the ULVOA were considered and, where possible, incorporated into the CS's policies. The suggestion that the Council has failed to take into account cross-borough linkages is unfounded. I deal with the criticism that the policies are too prescriptive under Issue 8 (iii). I find both policies sound.

* * *

- 3.88 ***Issue 19 - Whether it is appropriate for Core Policy 42 (Enfield Town) to seek to protect existing office accommodation.***

- 3.89 The GLA's London Office Policy Review (2009) identifies Enfield Town as one of the main office locations in the borough. Projections for office employment (2011-2031) suggest that it will increase with the borough's office accommodation catering mainly for the local market. The proposed Enfield Town AAP will appraise viability and the role that the town plays in the London and local office market. Pending the outcome of that appraisal the policy is sound in seeking to protect existing office accommodation.

* * *

4 Overall Conclusions

- 4.1 I conclude that, with the changes proposed by the Council set out in Appendix A, the Enfield Core Strategy DPD satisfies the requirements of s20(5) of the 2004 Act and meets the criteria for soundness in PPS12.

Ian Broyd

INSPECTOR