



**LONDON BOROUGH OF ENFIELD PRE-SUBMISSION
REGULATION 19 CONSULTATION ON THE
DRAFT LOCAL PLAN 2019-2041**

Presented by the Head of Planning.

SUMMARY

The London Borough of Enfield are consulting on their Pre-Submission draft Local Plan 2019-2041. Representations on the content of the draft Local Plan are invited before it is submitted for examination by a Planning Inspector, currently programmed for late summer. At this stage in the Plan making process the Council is seeking comments on the soundness of the Local Plan, its legal and procedural compliance.

The content of this report is focused on whether the Pre-Submission Local Plan addresses the concerns previously raised by the Authority, most recently in 2021 when a detailed response was made to the Regulation 18 draft of the Local Plan 'Main Issues and Preferred Approaches'. The Authority's draft formal representations both those supporting, and those seeking modifications to improve the soundness of the Local Plan are set out in the letter attached at Appendix A to this report. The matters that remain outstanding from the previous consultation response relate to the lack of policy support for the Lee Valley Regional Park, its remit and Park Development Framework, and the need for further minor amendments to policy and explanatory text in relation to Pickett's Lock under policy on Culture, Leisure and Recreation.

RECOMMENDATION

Members Approve: (1) the representations as set out in Appendix A to this report as the Authority's formal response to consultation by the London Borough of Enfield on the Pre-Submission draft Local Plan 2019 – 2041.

BACKGROUND

1 The London Borough of Enfield have reached the Pre-Submission Regulation 19 consultation stage in the preparation of their new Local Plan 2019-2041. This builds on two previous rounds of consultation – an Issues and Options consultation in 2019 alongside a Call for Sites process and a Reg 18 draft of the Local Plan 'Main Issues and Preferred Approaches', in the summer of 2021.

The Authority commented in detail at both stages, (Papers RP/30/19 and RP/53/21).

- 2 The Pre-submission Local Plan seeks to provide a “sustainable spatial approach which balances the need for ambitious levels of growth with a desire to ensure that it is socially and economically inclusive, whilst maintaining and enhancing the Borough’s environment.” It sets out both strategic policies and site allocations together with detailed Development Management Policies. It is accompanied by an Integrated Impact Assessment and Habitat Regulation Assessment, the proposed Policies Map and a range of other supporting documentation.
- 3 Following this round of consultation, the Pre-submission Local Plan will be submitted to the Secretary of State for Levelling Up, Housing and Communities who will appoint an Inspector to examine the Plan. All comments received during the consultation will be passed on to the Inspector for consideration as part of the examination process. Consultation responses at this stage in the plan making process are required to focus on the ‘soundness’ of the Local Plan, including the duty to cooperate. This is defined as whether the Plan has been positively prepared, whether it is justified (based on an appropriate strategy, taking into account the reasonable alternatives), whether it is effective – deliverable and based on effective joint working and consistent with national policy. Enfield Council aim to submit the Local Plan for examination in the summer (2024).
- 4 It should be noted that once adopted the new Enfield Local Plan (ELP) will replace the Core Strategy (2010) the Development Management Document (2014) as well as the Edmonton Leaside Area Action Plan (2020) and the North East Enfield Area Action Plan (2016) which cover areas of the Regional Park.
- 5 The Regional Park has a strong physical presence within the eastern part of the Borough and forms both a substantial green infrastructure resource and a major leisure and sporting attraction for the Borough’s residents. It includes key sites such as the Lee Valley Leisure Complex at Pickett’s Lock, the King George V and William Girling Reservoirs Site of Special Scientific Interest (SSSI), the open spaces at Rammey Marsh East (publicly accessible) and West (not publicly accessible) and the Enfield Lock Conservation Area. Part of the Park is also located within Meridian Water. A plan indicating the extent of land in the Regional Park and in the administrative boundary of the Borough is included in Appendix B to this report.
- 6 The Authority has adopted detailed proposals for those areas of the Regional Park which lie in the Borough through the Park Development Framework Area Proposals. Two sets of Area Proposals are relevant given the extent of Park in the borough: Area 4 The Waterlands: Banbury Reservoir to Pickett’s Lock, and Area 5 The Waterlands: King George V Reservoir to Rammey Marsh.
- 7 **Previous Consultation Responses**
In its response to the draft Local Plan Reg 18 version ‘Main Issues and Preferred Approaches’, (Letter dated 8th September 2021) the Authority endorsed the spatial vision and its four underpinning themes and the strong emphasis on establishing a high quality, biodiverse and green environment for the well-being and enjoyment of Enfield’s residents, employees and visitors, noting that the Regional Park and the work of the Authority make an important contribution to the vision in this respect.

- 8 The consultation response also raised a number of concerns and the Authority sought amendments to the Local Plan relating to the following matters:
- the lack of specific policy support for the Lee Valley Regional Park and the Park Development Framework proposals. The Authority sought an equivalent to the current Core Strategy Policy 35 which includes support for the Park, in order to satisfy the requirements of the Park Act 1966. Suggestions were included as to how this support might be worded including a policy statement supporting the adopted Park Development Framework Area proposals as they relate to the Park within Enfield;
 - additions were sought to the Meridian Water Placemaking Policy PL5 in respect of promoting connectivity with areas of the Park to the north and south, in particular Pickett's Lock, and in terms of protecting the waterways;
 - minor changes were suggested to Enfield's Blue and Green policies. Concern was raised about identifying sites within the Park such as Pickett's Lock, as Suitable Alternative Natural Green Space (SANGS) to mitigate for recreational impacts on Epping Forest Special Areas of Conservation (SAC). There is a need to understand what this would mean for the long term management of the Authority's venues and open spaces and the delivery of the Park Development Framework (PDF) proposals;
 - amendments were sought in relation to the policy provisions for Pickett's Lock, particularly in terms of the Culture, Leisure and Recreation section of the Plan and Policy CL3 for 'Visitor Accommodation'; although it was recognised that the Regional Park is not a town centre location it was still considered appropriate that this section of the Local Plan should include support for the Regional Park as a major sporting, and leisure destination in Enfield. Amendments were also required to the Pickett's Lock Site Allocation, to show the correct area and reference the PDF; and
 - additional detail was proposed for the Site Allocations 52 Rammey Marsh West and 55 Innova Park north to address the location of both sites within the Regional Park and the need to identify the environmental, ecological, landscape and access improvements that would be required when these sites are developed. Further information was also sought regarding the Green Belt status of these sites.
- 9 Since then there has been ongoing informed engagement between officers of both the Authority and the Borough via the Duty to co-operate process on Local Plan issues and in respect of development projects and property interests.
- 10 A summary of how far the Pre-Submission Local Plan addresses the concerns outlined above is considered below. The matters outstanding and new issues form the basis of the Authority's formal representation to the Local Plan consultation based on the tests of soundness. These are set out in the draft letter at Appendix A to this report. If approved each matter will also be formally made via the Digital Representation process.

CHANGES TO LOCAL PLAN POLICY IN RELATION TO THE ISSUES PREVIOUSLY RAISED BY THE AUTHORITY AND MATTERS OUTSTANDING

11 Support for the Lee Valley Regional Park and Placemaking Policy

Both the strategy outlined by the strategic objectives, and the policy presented within the Placemaking section require amendments in order to fully capture the potential of the Regional Park within Enfield. The Regional Park has a significant role in Enfield in terms of the delivery of a high quality, biodiverse and green environment for the well-being and enjoyment of Enfield's residents, employees and visitors. This should be reflected in the **Deeply Green Strategic Objective** which underpins the Spatial Vision. Suitable text is included as part of the Authority's formal representations at Appendix A to this report.

- 12 The Authority previously sought policy support for the Regional Park and the PDF proposals in order to satisfy the requirements of the Lee Valley Regional Park Act 1966. This is still missing from the draft Local Plan. In response to the Authority's previous comments an amendment to explanatory text para 3.115 under policy **PL9 Rural Enfield** has been made as follows – see new text in red font below:

"The Lee Valley Regional Park, situated along the banks of the River Lee and navigation canal, comprises a diverse range of linear parks, pathways, nature reserves, wetlands, water sport facilities and recreational spaces. These facilities create a network that connects Enfield to Hertfordshire, Essex and Central London. **The Council is fully committed to supporting the endeavours of the Lee Valley Regional Park Authority in unlocking the full potential of the Regional Park.**

- 13 The above addition can be welcomed but in order for the Local Plan to be considered positively prepared i.e. 'sound' a supporting statement within policy is required, one that also references the PDF, in accordance with the requirements of Park Act. It is proposed that this be added to **Strategic Policy PL9 'Rural Enfield'** under point 1. as set out in the text in red font as follows:

1. The open and historic character of rural Enfield (as shown on the Policies Map and key diagram) will be protected and enhanced in line with Green Belt and Metropolitan Open Land policies. The benefits of any new development must be considered to have a significant positive impact. New development should be designed to sensitively integrate physically and visually with Enfield Chase and the Lee Valley Regional Park, particularly in relation to open skylines, key entrance points, strategic views and valued landscapes. **The Council will support the work of the Lee Valley Regional Park Authority to realise the full potential of the Regional Park in accordance with the Park Development Framework proposals and to deliver a diverse range of open green and blue spaces, habitats and ecological enhancements, major sporting and leisure venues and visitor attractions.**

- 14 The Rural Enfield Policy is seeking to deliver transformational change within an area of urban-rural fringe designated on the Policies Map that extends from Trent Park and Whitewebbs in the west forming the Enfield Chase Landscape Recovery Area through to the Lee Valley Regional Park in the east (see also paragraph 20 below) and Appendix C to this report, which presents the Rural

Enfield Placemaking Vision at Fig 3.10. The additional text proposed above will help to balance the content of the Policy as part 2 of PL9 makes a number of specific references to areas within the Enfield Chase part of Rural Enfield. The Authority's formal submission will also include additional explanatory text (as before) for consideration at the examination stage.

- 15 It should be noted that officers at Enfield Council have been made aware of this omission and they have apologised for the confusion between policy and supporting text. They have encouraged the Authority to raise this matter as part of a formal representation.

16 Meridian Water Placemaking Policy PL5

Additional text has been added to Policy PL5 as proposed by the Authority and this is to be welcomed. Amendments are made to Policy PL5 under point 11 to ensure a more balanced approach to the use of the waterways for water sport where levels of harm to ecology and wildlife are taken into consideration. Reference is now included under the Movement and Connectivity section of Policy PL5 point 14, about the need to establish attractive and safe walking and cycling links through to Pickett's Lock in the north and Tottenham Marshes in the south i.e. linking Meridian Water into the wider Park area.

17 Blue and Green Enfield

Strategic policy BG1 covering the 'Blue and Green Infrastructure Network' and the revised policy BG2 'Protecting Nature Conservation sites' can be supported, as previously. New policy BG3 Protecting Epping Forest Special Area of Conservation (SAC) is also noted – this provides clarity in relation to the need for development to demonstrate it has put in place the required avoidance and mitigation measures to protect the Epping Forest SAC from adverse recreational impacts and is informed and supported by a Recreational Mitigation Strategy agreed with Natural England. The Mitigation Strategy does not now include reference to sites within the Regional Park as Suitable Alternative Natural Green Spaces (SANGS) – sufficient other local parks and open spaces have been identified and this is to be welcomed. The previous policy identified sites such as Pickett's Lock as potential SANGS and this raised concerns about what that would mean for the long term management in relation to the Authority's venues and open spaces and delivery of the PDF proposals.

- 18 The Local Plan sets out an ambitious policy for Biodiversity Net Gain under BG4 'Biodiversity Net Gain, Landscape Restoration and Offsetting' which expects applicants to produce an action plan setting out how development will achieve a minimum of 20% net gain, including habitat creation, and preferably on site. This is an increase over the previous policy which adhered to the mandatory 10% net gain and is aimed at supporting the Council's nature recovery plans. As explained in the supporting text the submission of a detailed action plan will enable biodiversity measures to be properly considered at the planning application stage, including details of the pre-development biodiversity value of the site and the steps taken to avoid any adverse effects from development and this is supported.

19 Pickett's Lock and Local Plan Policy on Green Belt, Culture, Leisure and Recreation

Pickett's Lock Site Allocation

References to Pickett's Lock are now included under a number of policies and accompanying explanatory text in the draft Local Plan. The **Site Allocation** for

RUR.06 Land at Pickett's Lock has been revised to refer to the whole site as requested by the Authority and this can be welcomed. This identifies the site as suitable for **"new sports, recreation and leisure facilities"**, please refer to Appendix D to this report.

20 Rural Enfield and Hubs of Sporting Excellence

The Placemaking Policy PL9 'Rural Enfield' references both the Regional Park and Pickett's Lock. The Rural Enfield Placemaking Vision (Appendix C to this report) delineates an arc of open spaces and woodlands surrounding Enfield Chase and stretching eastwards across to and including the Regional Park, an area that *"will undergo a remarkable transformation, emerging as the leading outdoor countryside destination in north London and surrounding area"*. The Placemaking Vision states that this area will offer a diverse range of rural activities including eco-tourism ventures, sporting opportunities and recreational pursuits and it sees both residents and visitors benefiting from *"access to wildlife-rich blue-green spaces and world class sporting facilities"*.

21 Policy supports proposals such as "Improved hubs of sporting excellence at Tottenham Hotspur training ground, Ponders End and **Pickett's Lock**" for the contribution they would make to the Rural Enfield objective (PL9 2. i.) This policy support is to be welcomed. An additional notation should also be added to Fig 3.10 'Rural Enfield Placemaking Vision' to identify the 'Lee Valley Leisure Centre at Pickett's Lock' and highlight this as an existing sports venue as well as an area of green space with biodiversity value.

22 Green Belt and Pickett's Lock

Reference previously included in supporting text to major developed sites in the Green Belt has been removed from the Local Plan. This description did apply to Pickett's Lock but officers from Enfield Council have explained that the Regulation 18 draft Local Plan did not include any policy on major developed sites and it has been removed to aid with the assessment of sites within the Green Belt. This change aligns the current draft Local Plan more closely with the National Planning Policy Framework (NPPF) and is to be expected.

23 Pickett's Lock does however comprise substantial areas of previously developed land and draft Local Plan **Policy BG6 'Development in the Open Countryside and Green Spaces Including in the Green Belt and Metropolitan Open Land'** permits:

"the partial or complete redevelopment of previously developed sites within the Green Belt"

provided they do not result in significant increases in traffic generation, do not have an adverse impact on historic character and adhere to requirements for green belts set out in national policy (Policy BG6 Point 2). The Site Allocation RUR.06 for land at Pickett's Lock also allocates the site for new sports, recreation and leisure facilities.

24 New Policy BG7 'Enhancing the Beneficial Uses of the Green Belt and Metropolitan Open Land' point 4 states that:

"The priorities for enhancements to retained areas of Green Belt are the Proposed Enfield Chase Landscape Restoration scheme and the Lee Valley Regional Park (as shown on the policies map respectively) and green linkages to these projects, depending on which site is most proximate to

development”.

No explanation is given in supporting text as to what this statement means in relation to the Regional Park. This is where reference to the remit of the Regional Park and PDF is important so that this can be drawn upon in the explanatory text to BG7. It should clarify that enhancements within the Regional Park would include proposals for the enhancement and improvement of leisure facilities at the Lee Valley Leisure Centre at Pickett's Lock where these are in accordance with the remit of the Regional Park proposals of the PDF.

25 Culture, Leisure and Recreation and Pickett's Lock

The Authority previously raised issues with strategic and development management policies in relation to the growth and expansion of existing culture leisure and sporting facilities which were directed towards the Borough's town centres and regeneration areas. More specific support was sought for the Regional Park as a suitable location in this respect, in particular the Lee Valley Leisure Complex, a strategic location within the east of the Borough. Policy CL1 Promoting Culture and Creativity does now include support for the **re-use of existing facilities** and the **diversification of existing facilities** which will be encouraged (CL1 1. and 3.) Policy CL2 Leisure and Tourism retains its support for proposals which promote greater use of rural parts of Enfield and the Lee Valley as a leisure and recreational resource without harming local biodiversity or water quality, (Policy CL2 1.d). For clarity the reference to Lee Valley in this policy should be amended to read Lee Valley **Regional Park** – this will tie policy into the PL9 Rural Enfield policy objectives.

26 Finally Policy support for investment in and the development of world class sports facilities at locations such as Pickett's Lock continue to be supported by **Policy CL4 'Promoting Sporting Excellence'** and minor amendments to policy and explanatory text now recognise that Pickett's Lock is more than just the Athletics Centre so reference is made in the policy to **"land at Pickett's Lock"** and the site allocation has of course been adjusted to include the whole site. Explanatory text recognises the world class facilities provided by the Regional Park (para 12.19).

27 Previous comments made in respect of **Policy CL3 Visitor Accommodation** are positively responded to in the Statement on Regulation 18 Consultation produced by the Council (page 221) but do not appear to have made it through to the draft Local Plan. The Authority sought the addition of a policy reference to the Regional Park as a location for potential visitor accommodation facilities, particularly given these feature at Pickett's Lock. The Council noted that a reference to the Regional Park would be added at CL3 Point 4 but this has not appeared in the Pre-Submission Version Local Plan. It is therefore necessary to raise this as a modification required to Policy CL3 as follows (see text in red font):

Proposals for camping facilities and the conversion of existing buildings to accommodate visitors in rural parts of Enfield will be supported especially within Enfield Chase and the Lee Valley Regional Park in line with policies RE4 and PL8 9

28 Economy and Policy E1 Employment and Growth

The Pre-Submission Local Plan confirms the allocation of two sites within the Park for employment uses under Policy E1 Employment and Growth. These are RUR.03 Rammey Marsh West and RUR.05 Land to the North West of Innova

Park. Both sites are to be removed from the Green Belt under Policy SS1 Spatial Strategy.

- 29 Supporting text explains that the Borough could meet the needs for industrial and logistics space within the urban area if intensification potential is optimised. The total urban supply is anticipated to be 305,315 sq. m. over the plan period. This supply relies heavily on anticipated intensification (approximately 197,460 sq. m) and by confining industrial and logistics development to the urban area, Enfield would risk both under-delivery if sites are not intensified as anticipated, and a lack of delivery in the early years of the plan, when prospects for the realistic delivery of intensified formats are less certain. As stated in para 9.23 "Developing selected Green Belt sites in addition to urban sites offers a more reliable means of supporting delivery, especially within the early years of the plan period." Rammey Marsh West is one of two sites that has the most potential for delivering an uplift in floorspace.
- 30 The Local Plan has recognised the potential of Rammey Marsh West for employment/industrial use as proposed by the Authority through the 'Call for Sites' process, (report to Members in Feb 2019 RP/31/19 NFP). The site has previously been identified through the Authority's Land and Property Strategy process as no longer required for Park purposes and potentially suitable for disposal. The Authority owns 14.28 acres, Transport for London (TfL) 9.19 acres, and the Council own 3.65 acres. The Authority's Executive Committee will consider any further representation on the draft Local Plan in its capacity as landowner.
- 31 The Site Allocation identifies the site as suitable for approx. 70,200sqm of new employment floorspace, (light industrial, general industrial storage and distribution and related sui generis). The land to the south adjacent to Innova Park also within the Park would clearly complement the Rammey Marsh west allocation. This site is considered suitable for approx. 16,445sqm of new employment floorspace.
- 32 Both proformas have been revised based on the Authority's previous comments and are included as Appendix E to this report. These now recognise the location of both sites within the Regional Park, the proximity of adjoining open spaces and the relevance of the PDF. These amendments are to be supported. The Rammey Marsh West proforma identifies the need for development on site to:
- create a new public open space along the Small River Lea with additional tree planting and biodiversity enhancements;
 - reinforce and positively contribute to the existing Wildlife Corridor and Metropolitan Site of Importance for Nature Conservation (SINC) maximising greening and ecology enhancements throughout the site; and
 - maximise the retention of existing high value trees along Mollison Avenue, the Small River Lea and the railway line to reinforce the existing green buffer.

More detail is provided in the proforma attached at Appendix E to this report.

- 33 Officers will continue to engage with the Council on the master planning of this area of the Regional Park to ensure the appropriate and sensitive

redevelopment of the land is achieved across both sites and the protection and enhancement of adjoining Park areas. Further Duty to Cooperate discussions will also continue as part of the Local Plan process.

ENVIRONMENTAL IMPLICATIONS

- 34 There are no environmental implications arising directly from the recommendations in this report but the draft Local Plan for Enfield once adopted will contain policies and allocations that guide and control development and the use of land within the borough that could have an impact on the protection, enhancement, and development of the Regional Park.

FINANCIAL IMPLICATIONS

- 35 There are no financial implications arising directly from the recommendations in this report.

HUMAN RESOURCE IMPLICATIONS

- 36 There are no human resource implications arising directly from the recommendations in this report.

LEGAL IMPLICATIONS

- 37 Planning applications referred to this Authority are submitted under the consultative arrangements of Section 14 (4-7) of the Lee Valley Regional Park Act 1966 (the Park Act). The Park Act requires a local planning authority to consult with the Authority on any planning application for development, whether within the designated area of the Park or not, which might affect any part of the Park.
- 38 The Park Act enables the Authority to make representations to the local planning authority which they shall take into account when determining the planning application.

RISK MANAGEMENT IMPLICATIONS

- 39 There are no risk management implications arising directly from the recommendations in this report.

EQUALITY IMPLICATIONS

- 40 There are no equality implications arising directly from the recommendations in this report.

Author: Claire Martin, 01992 709885, cmartin@leevalleypark.org.uk

BACKGROUND REPORTS

Enfield Pre Submission Local Plan 2019 – 2041 March 2024
Regulation 19 Consultation

PREVIOUS COMMITTEE REPORTS

Regeneration & Planning Committee	RP/30/19	Consultation by London Borough of Enfield Local Plan Reg 18 Issues and Options	14/02/2019
Regeneration & Planning Committee	RP/31/19	Planning Consultation by the London Borough of Enfield on the Draft Local Plan: Call for Sites	14/02/2019

APPENDICES ATTACHED

Appendix A	The Authority's draft response to the London Borough of Enfield Plan showing the Park area within the borough of Enfield
Appendix B	Extract from draft Local Plan showing Fig 3.10 Rural Enfield Placemaking Vision'
Appendix C	
Appendix D	Draft Local Plan Site Allocation RUR.06 land at Pickett's Lock
Appendix E	Site allocations for RUR.03 Rammey Marsh West and RUR.05 land north west Innova Park

LIST OF ABBREVIATIONS

SINC	Site of Importance for Nature Conservation
PDF	Park Development Framework
SSSI	Site of Special Scientific Interest
SANGS	Suitable Alternative Natural Green Space
HRA	Habitat Regulations Assessment
SAC	Special Area of Conservation
MOL	Metropolitan Open Land
ELP	Enfield Local Plan
RMW	Rammey Marsh West
TfL	Transport for London
the Park Act	Lee Valley Regional Park Act 1966



May Hope
Head of Strategic Planning & Design
Enfield Council
Civic Centre
Silver Street
Enfield
EN9 3XA

Email: cmartin@leevalleypark.org.uk
Direct Dial: 01992 709885

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Dear May

RE: CONSULTATION ON THE PRE SUBMISSION DRAFT LOCAL PLAN 2019 – 2041 (REGULATION 19 CONSULTATION) - LEE VALLEY REGIONAL PARK AUTHORITY REPRESENTATIONS

Thank you for consulting the Regional Park Authority on the Pre-Submission Draft Local Plan 2019 – 2041 (Regulation 19 consultation).

A report on this matter was considered by the Authority's Members at the Lee Valley Regeneration and Planning Committee on the 25 April 2024 when the following comments were agreed. These are focused on how far the current draft Local Plan addresses the matters of concern previously raised by the Authority and whether as a result the Authority considers the plan to be sound. The representations set out below include modifications to address the matters still outstanding and will also be formally submitted via the online representation process.

Representations relating to policy support for the Lee Valley Regional Park

Vision and Strategic Objectives

The Pre-Submission draft Local Plan maintains its emphasis on the need to establish a high quality, biodiverse and green environment for the well-being and enjoyment of Enfield's residents, employees and visitors. This is clearly established in the Spatial Vision and strategic objectives and supported by the Authority. The Regional Park is a major contributor in this respect, not just because of the substantial area of the Park present within Enfield, (approximately 653 hectares, or 16.27% of the total Park area) but also because of the variety of green and blue spaces, sport and leisure venues and biodiversity it has to offer both to local people and visitors from across the wider region.

Now that the Spatial Vision and accompanying Strategic Objectives have been finalised the potential of the Regional Park within Enfield should be captured by a reference to the Regional Park under the strategic objective 'A Deeply Green Place'. This would indicate that the Regional Park has a role in the Local Plan's strategy to establish a high quality, biodiverse and green environment. The following wording (red font below) is proposed as part of **Strategic Objective point 12**:

12. To deliver significant green infrastructure enhancements, ensuring improved public access to newly established woodlands, restored river corridors and new parks and open spaces for both existing and new residents. To support protection, enhancement and provision of the diverse range of open space, habitats, sporting and leisure venues within the Lee Valley Regional Park. To facilitate the creation of a major green infrastructure corridor in the northern part of the Borough, supporting Enfield's position as a leading 'Green' destination.

Policy support for the Regional Park and the Park Development Framework under Rural Enfield Placemaking Policy

To be considered sound i.e. positively prepared and justified a policy statement in support of the Regional Park and the Park Development Framework should be included in the Local Plan. This would fulfil the requirements of the Lee Valley Regional Park Act 1966 which underpins the remit and work of the Park Authority as a statutory body. Section 14 (1) of the Park Act requires the Authority to prepare a plan setting out proposals for the future management and development of the Regional Park and riparian authorities such as Enfield are required to include those parts of the plan affecting their area within their own relevant planning strategies and policies (Section 14(2) 8 (a)) although inclusion does not infer that the planning authority necessarily agrees with them (Section 14(2) (b)).

As previously suggested this could sit within the Placemaking section of the Plan, under Policy PL9 'Rural Enfield', given that the Regional Park makes up the eastern half of the Rural Enfield area as shown on Fig 3.10 'Rural Enfield Placemaking vision.' The following text (shown in red font below) is proposed as an addition to Policy PL9 Rural Enfield point 1 and will form the basis of a formal representation from the Authority regarding the soundness of the Local Plan.

The open and historic character of rural Enfield (as shown on the Policies Map and key diagram) will be protected and enhanced in line with Green Belt and Metropolitan Open Land policies. The benefits of any new development must be considered to have a significant positive impact. New development should be designed to sensitively integrate physically and visually with Enfield Chase and the Lee Valley Regional Park, particularly in relation to open skylines, key entrance points, strategic views and valued landscapes. The Council will support the work of the Lee Valley Regional Park Authority to realise the full potential of the Regional Park in accordance with the Park Development Framework proposals and to deliver a diverse range of open green and blue spaces, habitats and ecological enhancements, major sporting and leisure venues and visitor attractions.

Explanatory text should set out the statutory role of the Park Authority and its planning functions and an example of text to be included is attached as Annex A to this letter.

This Policy addition would complement the new text which the Council has added to the explanatory text for policy PL9 under para 3.113 which now states: "The Lee Valley Regional Park, situated along the banks of the River Lee and navigation canal, comprises a diverse range of linear parks, pathways, nature reserves, wetlands, water sport facilities and recreational spaces. These facilities create a network that connects Enfield to Hertfordshire, Essex and Central London. The Council is fully committed to supporting the endeavours of the Lee Valley Regional Park Authority in

unlocking the potential of the Regional Park" (new text added by the Council in red, underlined).

Support for Placemaking Policy PL5 Meridian Water.

The Authority notes there have been some minor amendments to Policy PL5 Meridian Water and maintains its previous support for this policy and the Placemaking vision for Meridian Water. As before detailed policy guidance for this area is welcomed in particular the points relating to the delivery of green corridors, public open space and the requirement for development to contribute to the naturalisation and ecological enhancement of existing waterways.

Previously the Authority had reservations about the demands policy was potentially placing on the waterways within this area – the waterways were identified in policy as part of the public realm, a focal point for cultural activity, with access routes alongside, and an important ecological resource. Policy PL5 point 11 also proposed the Lee Navigation as a venue for water sports facilities. Whilst policy still states that development proposals in Meridian Water "could explore opportunities for water sports facilities along the Lee Navigation..." the Authority supports the additional policy text (red and underlined) that has been added stating "which will be encouraged where it would not have an unacceptable level of harm to ecology and wildlife."

Likewise the amendment to policy PL5 point 14 under **Movement and Connectivity** shown in red text below is supported. This now makes reference, as requested, to the need for development to also provide connections through to the wider Park area to the north and south of Meridian Water as follows:

"Development should also deliver new strategic connections from Meridian Water to key destinations (such as Edmonton Green, North Middlesex Hospital, Angel Edmonton, Pickett's Lock to the north and Tottenham Marshes to the south) and neighbouring Boroughs (via the Lee Valley Regional Park) to overcome physical severance and provide attractive and safe walking and cycling links"

Support for and Minor Amendments to Policy Section Blue and Green Enfield

The Authority reiterates its support for strategic policy BG1 covering the Blue and Green Infrastructure network and the revised policy BG2 'Protecting Nature Conservation Sites'. As previously, references to the Regional Park are welcome particularly where they identify measures to overcome issues of inaccessibility, physical severance, and the fragmentation of spaces and habitats. The additional reference to preserving, enhancing and better revealing the "significance of Enfield's historic landscapes, including watercourses" is endorsed (BG1 point 1.k.).

SANGS and Biodiversity Net Gain

New Policy BG3 'Protecting Epping Forest Special Area of Conservation' (SAC) is noted. This offers clarity on the need for development to demonstrate it has put in place the required avoidance and mitigation measures to protect the Epping Forest SAC from adverse recreational impacts. It highlights the role of the Council's Recreational Mitigation Strategy in setting out guidance for developments in the Local Plan and identifying Suitable Alternative Natural Green Spaces (SANGS) to facilitate the redirection of potential new users away from the SAC. With the Recreational Mitigation Strategy in place, reference to sites within the Park including

Pickett's Lock as suitable for SANGS mitigation has been removed from the Policy and this is welcome.

The Authority previously raised concerns about the implications of policy identifying sites in the Park which could present issues for the long term management in relation to the Authority's venues and open spaces and delivery of the PDF proposals. The open spaces within the Regional Park, many of which are designated as part of the Lee Valley SPA, already face considerable recreational pressure from visitors and increased numbers of local residents which makes their management for ecological objectives in accordance with these designations difficult.

Biodiversity Net Gain

It is noted that Policy BG4 'Biodiversity Net Gain, Landscape Restoration and Offsetting' sets out a requirement for a minimum of 20% net gain from development. The preference for this to be achieved on-site is endorsed as is the requirement for applicants to provide an action plan to demonstrate that biodiversity measures and mitigation has been considered early in the planning application stage.

A minor amendment is sought to the explanatory text under Policy BG5 Green Belt and Metropolitan Open Land. Paragraph 6.30 makes reference to the Lee Valley 'Country' Park stating that this forms part of the Metropolitan Open Land (MOL) within the borough. A correction to the text is required as none of the Regional Park within Enfield is designated as MOL.

Representation regarding Pickett's Lock - Green Belt Policy and Policy on Culture Leisure and Recreation

Pickett's Lock Site Allocation

The Authority welcomes the revision to **Site Allocation RUR.06 Land at Pickett's Lock** which now shows the full extent of the site. The description of existing uses should be amended to read "**Lee Valley Leisure Centre at Pickett's Lock including Athletics Centre, Cinema, golf course, campsite and adjacent land including car park.**"

Pickett's Lock Hub of Sporting Excellence

The Authority supports the amendment to **Policy PL9 point 2 i.** which now lists Pickett's Lock as a hub of sporting excellence as follows:

Proposals which will be supported to contribute to this objective (the 'Rural Enfield destination') include ...

- i. improved hubs of sporting excellence at Tottenham Hotspur training ground, Ponders End and Pickett's Lock**

This addresses the amendment previously sought by the Authority and is welcomed.

An additional notation should also be added to Fig 3.10 'Rural Enfield Placemaking Vision' to identify the '**Lee Valley Leisure Centre at Pickett's Lock**' and highlight this as an existing sports venue as well as an area of green space with biodiversity value.

Green Belt

It is noted that the Regional Park is an area of the Green Belt identified as a 'priority for enhancement' under the New Policy **BG7 Point 4 'Enhancing the Beneficial**

Uses of the Green Belt and Metropolitan Open Land'. An explanation is required in supporting text as to what this statement means in relation to the Regional Park. It is proposed that a new paragraph is added to the explanatory text after paragraph 6.38 which supports the statutory remit of the Authority and the Park Development Framework Area Proposals as they relate to the Park within Enfield's Green Belt. It should also be consistent with Placemaking Policy PL9 which highlights and supports improvements to 'sporting hubs of sporting excellence' such as at Pickett's Lock. The following wording is suggested:

The Lee Valley Regional Park Authority has produced detailed proposals for the area of the Regional Park within the green belt in Enfield, as part of its Park Development Framework. These are focused on providing improved visitor facilities and public access, the redevelopment of the Lee Valley Leisure Centre at Pickett's Lock as a strategic leisure destination, and habitat enhancements at Rammey Marsh East and Swan and Pike Pool. Partnership working is also highlighted as a key mechanism for habitat and public access improvements, particularly in relation to land either side of the North Circular and the large areas of water in this area; the reservoirs, Lee Navigation and at Ponders End Waterfront.

Culture, Leisure and Recreation Policy and Pickett's Lock

The Authority previously sought support for the Regional Park as both a strategic and suitable location for the growth and expansion of existing culture leisure and sporting facilities. Reference was made to the established venues and facilities at the Lee Valley Leisure Complex, a key location within the east of the Borough.

It is noted that **Policy CL1 'Promoting Culture and Creativity'** does now include support for the re-use of existing facilities and the diversification of existing facilities which will be encouraged (CL1 1. and 3.). **Policy CL2 'Leisure and Tourism'** retains its support for proposals which promote greater use of rural parts of Enfield and the Lee Valley as a leisure and recreational resource without harming local biodiversity or water quality, (Policy CL2 1.d.) and these changes are supported. For clarity Policy CL2 1.d should be amended to read

d. proposals which promote greater use of rural parts of Enfield and Lee Valley Regional Park as a leisure and recreational resource without harming local biodiversity or water quality

This will ensure policy under CL2 complements policy objectives under PL9 Rural Enfield.

Policy CL4 'Promoting Sporting Excellence' and the minor amendment made to both policy and explanatory text are supported. Policy refers to "land at Pickett's Lock", the site allocation has been adjusted to include the whole site and explanatory text recognises the world class facilities provided by the Regional Park (para 12.19).

Visitor Accommodation

An amendment is however required to **Policy CL3 Visitor Accommodation**. The Authority sought the addition of a policy reference to the Regional Park as a location for potential visitor accommodation facilities, particularly given these feature within a number of sites in the Park, including at Pickett's Lock. PDF Area proposals outline further opportunities for a range of provision across a wide range of accommodation types, and indeed hotel, glamping and lodge style accommodation is often an integral part of major leisure and sporting developments. The Council noted in the

'Statement on Regulation 18 Consultation' (page 221) that a reference to the Regional Park would be added at CL3 Point 4 but this is not included in the current draft Local Plan. The Authority therefore requires a modification to Policy CL3 as follows:

Proposals for camping facilities and the conversion of existing buildings to accommodate visitors in rural parts of Enfield will be supported especially within Enfield Chase and the Lee Valley Regional Park in line with policies RE4 and PL8 9

Economy and Policy E1 Employment and Growth

It is noted that Strategic Policy E1 Employment and Growth has confirmed the allocation of two sites within the Regional Park - Rammey Marsh West (RMW) RUR.03 and land north-west of Innova Park RUR.05 as suitable for industrial and logistics development and both have been removed from the Green Belt. The Rammey Marsh West allocation was proposed by the Authority and is supported in principle. The revised site proformas for both allocations are also noted – these make reference to the Regional Park designation and that regard must be had to the Park Development Framework and associated documents in assessing any planning application on this land,

The Authority supports the infrastructure requirements for ecological and greening enhancements to be delivered throughout the RMW site, for biodiversity improvements to Rammey Marsh itself and the design principle that a new area of public open space should be provided alongside the Small River Lea with additional tree planting and biodiversity enhancements. Similarly the requirements for enhanced pedestrian and cycle connectivity as part of the development on RUR.05 is also supported as is the need for development to contribute to streetscape improvements, urban greening, tree planting and biodiversity improvements to Rammey Marsh. Officers would wish to work closely with the Council on the master planning of this area of the Park to ensure the appropriate and sensitive redevelopment of the land in a comprehensive manner across both sites.

Given the Authority owns part of the site allocated under RUR.03 the Authority's Executive Committee will consider whether, in its capacity as landowner, any further representations should be made to the draft Local Plan.

The Authority looks forward to engaging further with Borough officers on the matters raised above as part of the Duty to Co-operate process to help inform the next stage of the Local plan process.

Yours sincerely

Claire Martin
Head of Planning

Annex A to Letter LVRPA Policy and Explanatory Text

Lee Valley Regional Park Policy

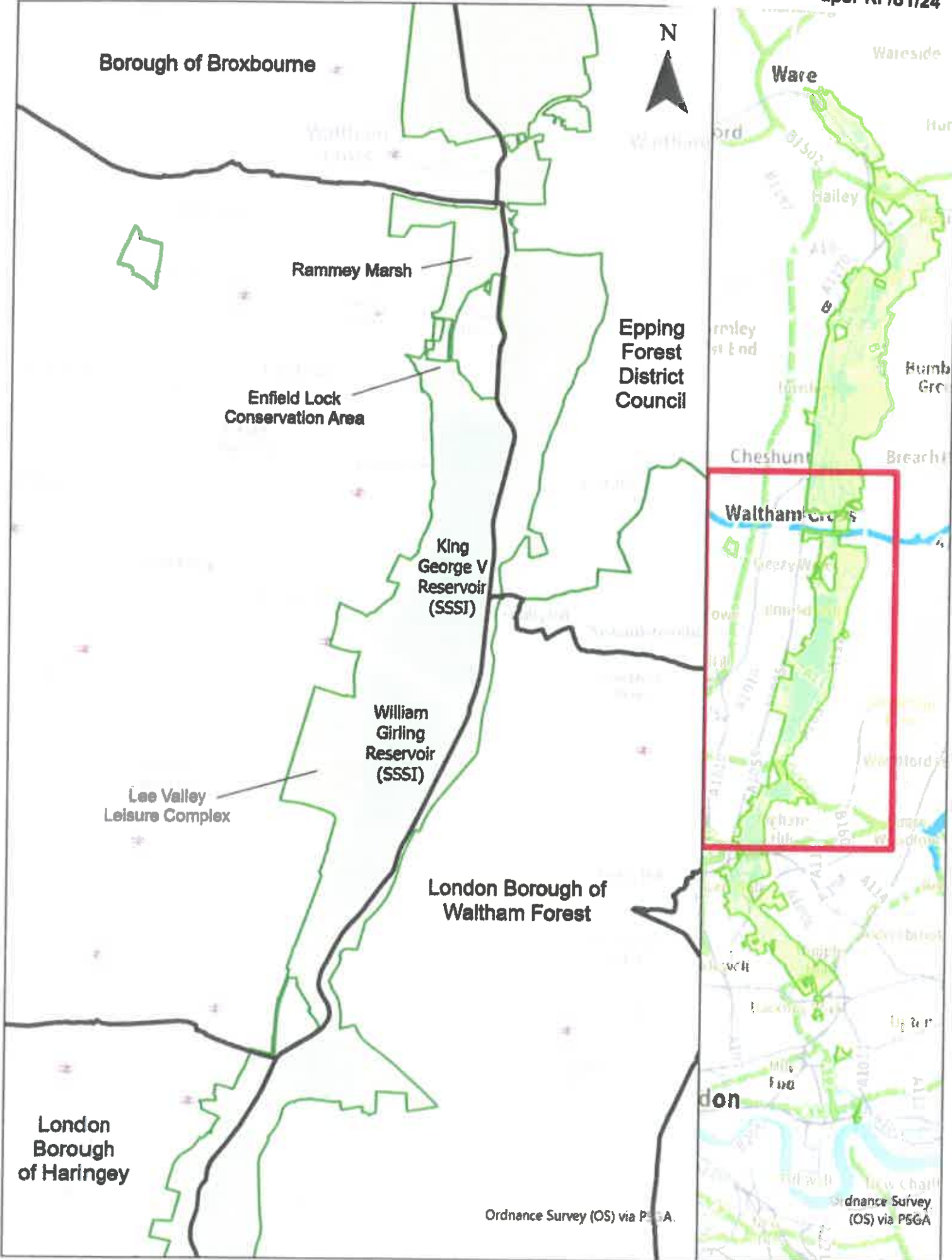
The Council will support the work of the Lee Valley Regional Park Authority to realise the full potential of the Regional Park in accordance with the Park Development Framework proposals and to deliver a diverse range of open green and blue spaces, habitats and ecological enhancements, major sporting and leisure venues and visitor attractions.

Explanatory Text

The Lee Valley Regional Park Authority (LVRPA) is a statutory authority created by the Lee Valley Regional Park Act 1966 (The Park Act). It has a statutory responsibility to either provide directly or work with partners to provide facilities for sport, recreation, leisure, entertainment and nature conservation throughout the Park. Section 14 (1) of the Park Act requires the Authority to prepare a plan setting out proposals for the future management and development of the Regional Park and riparian authorities such as Enfield are required to include those parts of the plan affecting their area within their own relevant planning strategies and policies (Section 14(2) 8 (a)) although inclusion does not infer that the planning authority necessarily agrees with them (Section 14(2) (b)).

The Park Development Framework Area Proposals are relevant in terms of Section 14 (2) of the Park Act and are formal statements of the Authority's position in respect of development within the Regional Park. Further, sections 14 (subsections 4-7) of the Park Act requires local planning authorities to consult with the LVRPA on applications for planning permission which they consider could affect the Park. Section 14 (subsections 8-9) allows the LVRPA to refer the decisions of the riparian authorities to the Secretary of State if it is considered by the LVRPA that the decision taken materially conflicts with the proposals of the Authority for the development of the Park.

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Borough of Broxbourne



Ramney Marsh

Epping Forest District Council

Enfield Lock Conservation Area

King George V Reservoir (SSSI)

William Girling Reservoir (SSSI)

Lee Valley Leisure Complex

London Borough of Waltham Forest

London Borough of Haringey

Ordnance Survey (OS) via PISA.



Rural Enfield

Emerging Enfield Chase - Landscape Recovery Vision 2023 - 2043

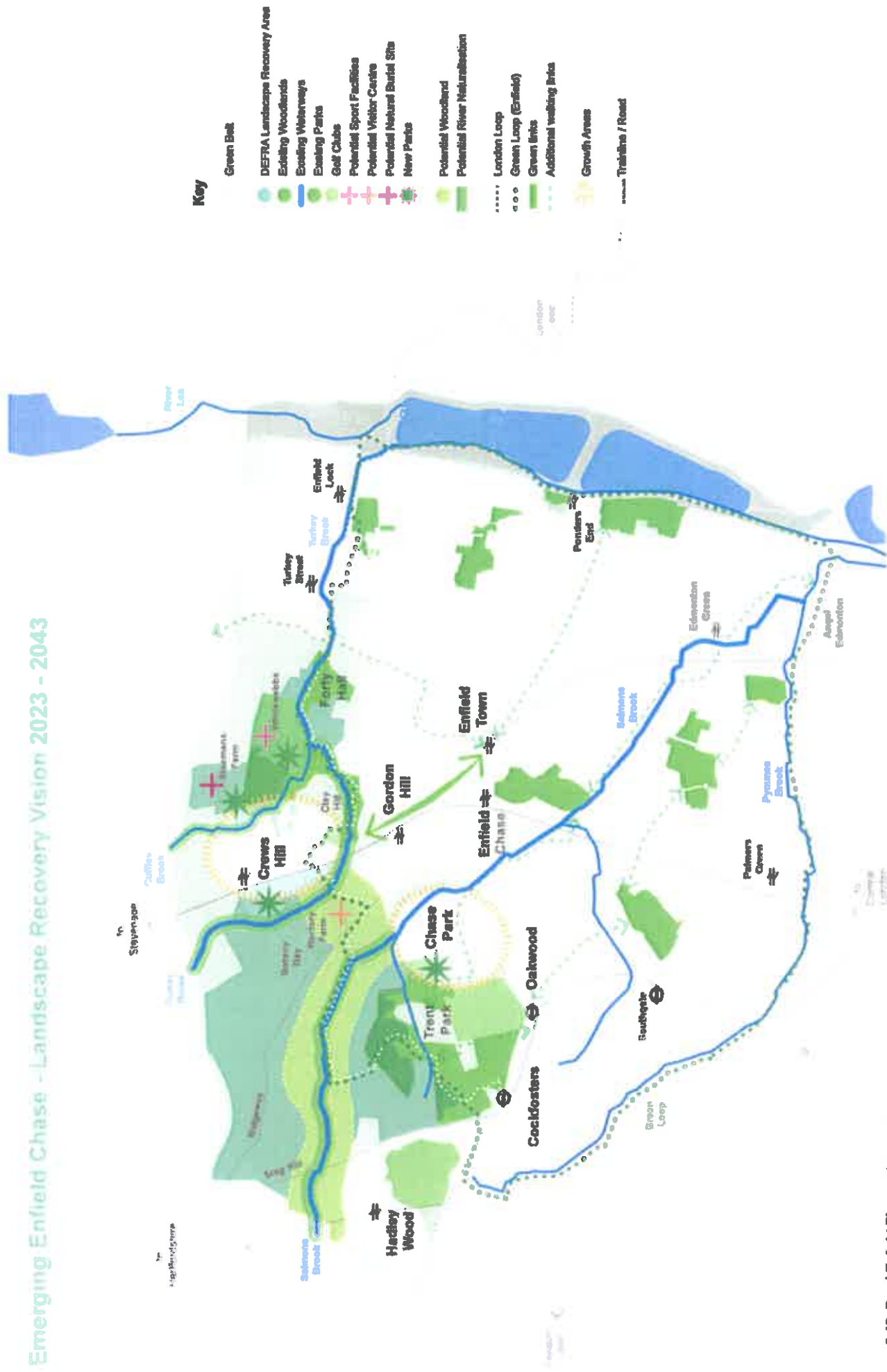


Figure 3.10: Rural Enfield Placemaking vision

Appendix C

Table C1.181: SA RUR.06 - Land at Picketts Lock

SA RUR.06: LAND AT PICKETTS LOCK	
Existing site information	
Address	Land at Picketts Lock, N9 OAS
Site Area	57.49 ha
Existing Use(s)	Cinema, golf course, campsite and adjacent land including car park
Site considerations	
Flood Zone	1
PTAL	1b
Heritage Considerations	None
Impacts on Archaeological Priority Area	None
Proposal	
Land Use Requirements	The site could provide new sports, leisure and recreation facilities. This site lies within the Lee Valley Regional Park Authority area. Regard must be had to the proposals and policies within the Park Development Framework (2019) and associated documents in assessing any planning application on this land.
Implementation	
Timeframe	0-5 years 5-10 years 10+ years
Approximate Estimated Non-residential capacity (Class E)	Provision of non-residential floorspace.

OTHER SITE ALLOCATIONS

SA RUR.06: Land at Picketts Lock



Table C1.182: SA RUR.06 – Land at Picketts Lock

SA RUR.06: LAND AT PICKETTS LOCK	
Proposal	
Infrastructure requirements	<p>Redevelopment of the site;</p> <ul style="list-style-type: none"> I. should contribute towards bus service prioritisation and associated traffic management measures along A1010. II. should contribute towards enhanced pedestrian and cycle connectivity –Ponders End Station. III. should contribute towards delivery of streetscape improvements, urban greening and tree planting.
Design Principles	<p>Development on the site:</p> <ul style="list-style-type: none"> A. must provide at least one east-west publicly accessible connection across the site to Pymmes Brook and River Lee Navigation. B. in collaboration with Enfield Council explore the feasibility of the delivery of a new connection over Meridian Way, Boundary ditch and the railway and contribute to this connection if this is possible. The northern edge with a connection from Charlton Road Park could be an optimal location. This must be delivered if it is feasible. It must be demonstrated that this cannot be achieved with other public benefits offered instead if this is not proposed. C. should provide streetscape improvements along Meridian Way, Morson Road and Pickett's Lock Lane. D. should contribute towards the improvement of north-south pedestrian and cycle connections along the River Lee Navigation. E. should retain as many of the existing high value trees on site as possible and/or replace and trees removed as part of a comprehensive landscaping strategy. F. must retain the existing sense of openness and should respond sensitively to important local views (2- Kings Head Hill and 10 – Ponders End) as well as views towards the Reservoir and Epping Forest. G. should improve existing pedestrian and vehicular access. H. should create additional pedestrian access(es) and permeability between the site and Meridian Way, Morson Road and Pickett's Lock Lane, including a new pedestrian gateway in the south-east corner of the site which connects to the River Lee Navigation path and improves the sense of arrival into the site from the south. I. must promote nature recovery with additional tree planting and biodiversity enhancements introducing a variety of habitats to include species-rich meadows and woodland. J. must provide a 10m exclusion zone either side of existing pylons.

Table C1.173: SA RUR.03- Land West of Ramney Marsh

SA RUR.03: LAND WEST OF RAMNEY MARSH	
Existing site information	
Address	Land West of Ramney Marsh, Mollison Avenue
Site Area	12.01 ha
Existing Use(s)	Open land
Site considerations	
Flood Zone	1
PTAL	1a
Heritage Considerations	None
Impacts on Archaeological Priority Area	Within APA.
Proposal	
Land Use Requirements	Redevelopment should provide at least 70,200 sq m of new employment floorspace (light industrial, general industrial, storage and distribution, and related sui generis) floorspace. This sites lies within the Lee Valley Regional Park Authority area. Regard must be had to the proposals and policies within the Park Development Framework (2019) and associated documents (if assessing any planning application on this land).
Implementation	
Timeframe	0-5 years 5-10 years 10+ years
Approximate estimated Industrial capacity	at least 70,200 sq m

OTHER SITES OUTSIDE THE PLACEMAKING AREAS

SA RUR.03: Land West of Ramney Marsh



Table C1.174: SA RUR.03- Land West of Ramney Marsh

SA RUR.03: LAND WEST OF RAMNEY MARSH	
Proposal	Design Principles
<p>Infrastructure requirements</p> <p>Redevelopment of the site;</p> <ul style="list-style-type: none"> I. should contribute towards increasing provision of more direct and frequent bus services along A1055 to improve connectivity to and from industrial areas. II. should contribute towards enhanced pedestrian and cycle connectivity from Enfield Lock Station. III. should contribute towards delivery of streetscape improvements, urban greening and tree planting. IV. should deliver biodiversity improvements to Ramney Marsh. V. must deliver ecological enhancements in strengthening the links between the Lee Valley Regional Park and Enfield Chase as part of the arc of open spaces. VI. must contribute to the creation of a north-south active travel and biodiversity corridor along the Small River Lea. <p>* The Environment Agency has noted that this site is within 250m of a portable groundwater abstraction, is within SPZ1, particularly sensitive with respect to groundwater and as partly or fully overlying historic landfills. Redevelopment proposals will need to comply with the Environment Agency's Approach to Groundwater Protection.</p>	<p>Development on the site:</p> <ul style="list-style-type: none"> A. must maximise the retention of existing high value trees along Mollison Avenue, the Small River Lea and the railway line to reinforce the existing green buffer. B. must reinforce and positively contribute to the existing Wildlife Corridor and Metropolitan SINC maximising greening and ecology enhancements throughout the site. C. must create a new public open space along the Small River Lea with additional tree planting and biodiversity enhancements. D. should provide streetscape improvements along Mollison Avenue and the roundabout, for example wider footpaths, trees, planting, and the incorporation of street furniture. E. must create active frontages and high levels of visual permeability at ground floor along key routes. F. must locate yard and loading spaces away from the street edge. G. must be articulated and broken down to avoid a large, single mass building. H. Could consider building heights of up to 39m for industrial intensification. I. Must decrease building heights towards the south-west of the site to minimise impact on neighbouring lower rise existing buildings. J. should consider long views from the east when designing building frontages along the eastern edge. Articulation, change of material, colour or window arrangement should be considered to add visual interest to these important frontages. K. should provide limited parking to promote active travel. L. must provide pedestrian and vehicular access from Mollison Avenue roundabout and a secondary pedestrian access point on Mollison Avenue.

Table C1.177: SA RUR.05 - Land to the North West of Innova Park

SA RUR.05: LAND TO THE NORTH WEST OF INNOVA PARK	
Existing site information	
Address	Land to North West of Innova Park, EN3 7XY
Site Area	3.47 ha
Existing Use(s)	Unused
Site considerations	
Flood Zone	1
PTAL	1b
Heritage Considerations	Within an APA
Impacts on Archaeological Priority Area	Within an APA.
Proposal	
Land Use Requirements	Redevelopment should new employment floorspace (light industrial, general industrial, storage and distribution, and related sui generis) floorspace . Address highways impacts of development and mitigate flood risk. This sites lies within the Lee Valley Regional Park Authority area. Regard must be had to the proposals and policies within the Park Development Framework (2019) and associated documents in assessing any planning application on this land.
Implementation	
Timeframe	0-5 years 5-10 years 10+ years
Industrial capacity	At least 16,445 sq m

OTHER SITES OUTSIDE THE PLACEMAKING AREAS

SA RUR.05: Land to the North West of Innova Park



Table C1.178: SA RUR.05 - Land to the North West of Innova Park

SA RUR.05: LAND TO THE NORTH WEST OF INNOVA PARK

Proposal	
<p>Infrastructure requirements</p>	<p>Redevelopment of the site;</p> <ul style="list-style-type: none"> i. should contribute towards increasing provision of more direct and frequent bus services along A1055 to improve connectivity to and from industrial areas ii. should contribute towards enhanced pedestrian and cycle connectivity. iii. should contribute towards delivery of streetscape improvements, urban greening and tree planting should deliver biodiversity improvements to Rammey Marsh. <p>The Environment Agency has noted that sites within SPZ1 are particularly sensitive with respect to groundwater, and additional constraints will be placed on the above development proposals.</p>
<p>Design Principles</p>	<p>Development on the site:</p> <ul style="list-style-type: none"> A. must maximise the retention of existing high value trees along Mollison Avenue, Solar Way and the railway line to reinforce the existing green buffer and Wildlife Corridor). B. should provide streetscape improvements along Solar Way, for example wider footpaths, trees, planting, and the incorporation of street furniture. C. could maintain a pedestrian connection parallel to the watercourse towards the Small River Lea. D. must create active frontages and high levels of visual permeability at street level along key routes. E. must locate yard and loading spaces away from the street edge. F. should provide stacked industrial uses to make efficient use of available land. G. must be articulated and broken down to avoid a large, single mass building. H. could consider heights of up to 39m for industrial intensification. I. should provide limited parking to promote active travel. J. must provide pedestrian and vehicular access from Solar Way with a secondary pedestrian access point on Mollison Avenue.