

**LONDON BOROUGH OF ENFIELD DRAFT LOCAL PLAN -  
MAIN ISSUES PREFERRED OPTIONS (REGULATION 18)  
CONSULTATION**

Presented by the Head of Planning.

**SUMMARY**

The London Borough of Enfield are consulting on their draft Local Plan 2019-2039 'Main Issues Preferred Options', Regulation 18 version. This offers a comprehensive suite of strategic and development management policies for consideration, identifying both a preferred level of growth and a spatial strategy to accommodate the growth.

The Authority responded to the previous earlier Regulation 18 consultation in 2019 and the accompanying 'call for sites', proposing three sites for consideration; land at Harbert's Road, Rammey Marsh West, and the Pickett's Lock Lane residential area. Since then there has been ongoing informed engagement between officers of both the Authority and the London Borough of Enfield in respect of property interests and development projects, such as The Wave, as well as via the Duty to Co-operate process on Local Plan issues.

The Authority's detailed comments are set out in the letter attached as Appendix A to this report. The main concerns relate to the lack of a specific policy supporting the Lee Valley Regional Park, its remit and Park Development Framework; the need to revise Site Allocation SA 56 for Pickett's Lock and the degree of support for major leisure investment in the wider site recognising its potential as a strategic site; and the need for further work on the proformas for the industrial site allocations at Rammey Marsh West and land to the south adjacent to Innova Park. Duty to Cooperate discussions are underway with London Borough of Enfield officers and should assist in resolving these matters.

**RECOMMENDATION**

Members Approve: (1) the comments as set out in Appendix A to this report as the Authority's formal response to the consultation by the London Borough of Enfield on the draft Local Plan 2019 - 2039 Main Issues Preferred Options.

## BACKGROUND

- 1 Members will recall responding to a draft Local Plan Regulation 18 (Reg18) Issues and Options document in February 2019 (paper RP/30/19), alongside the Call for Sites process. This new Reg 18 draft Local Plan now identifies both a preferred level of growth and a preferred spatial strategy to accommodate the growth. It also responds to changes in government planning policy; the climate and ecological emergencies; COVID; and the recently adopted New London Plan. It sets out the Council's preferred policy options, both those that are fully formed and others which are indicative; stakeholders are being asked for input before policy can be developed further. The draft Local Plan is accompanied by an Integrated Impact Assessment (IIA) which comprises a Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA), Health Impact Assessment (HIA), Equalities Impact Assessment (EqIA), Community Safety Impact Assessment (CSIA) and Habitats Regulations Assessment (HRA).
- 2 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.
- 3 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 SSSI, the open spaces at Rammey Marsh East (publicly accessible) and Rammey Marsh 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 at Appendix B to this report.
- 4 The Authority has adopted detailed proposals for those areas of the Regional Park which lie in the Borough through the Park Development Framework (PDF) 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.
- 5 In response to the previous Reg 18 consultation in 2019, the Authority raised as its primary concern the need for a clear policy which would support new major investment in leisure at the Lee Valley Leisure Complex at Pickett's Lock. Discussions are ongoing with the London Borough of Enfield on the future of this site and include positive engagement with Council officers around The Wave London proposals. These seek to deliver an Olympic standard surfing venue at Pickett's Lock together with a range of outdoor recreational space and leisure facilities establishing a venue that will attract national and international visitors to London. Similarly, the Authority has engaged with Council officers working on the Meridian Water masterplan in some detail to help secure the creation and delivery of new open spaces within the Park for the benefit of new residents and visitors alike.
- 6 The Authority's response to the accompanying 'call for sites' in 2019 and more recently in 2020, proposed three sites for consideration; land at Harbet Road (1.3ha), Rammey Marsh West, where the Authority owns 5.7ha, and the Pickett's Lock Lane residential area (0.5ha). Recently terms were agreed with

Enfield Council for the purchase of part of the land at Harbet Road as part of the planning process and early phases in the delivery of infrastructure works for the Meridian Water development. The Authority is currently awaiting Secretary of State consent to the transaction before completing.

**7 Next Stages**

Following this consultation and the consideration of comments, the Council are aiming to publish a Proposed Submission Version (Reg 19) consultation of the Local Plan in the summer of 2022, with Examination programmed for autumn 2022 to 2023 and adoption in early 2024.

**DRAFT LOCAL PLAN OVEVIEW, VISION AND SPATIAL STRATEGY**

**8** The draft Local Plan sets out a Vision for the Borough. In summary, this states that by 2039 it will be “a place of growing opportunity for future generations: a green lung of London and a place where new homes and jobs help all our communities thrive”. Four guiding themes underpin the Vision, together with 30 strategic objectives. The themes cover:

- a nurturing place;
- a deeply green place;
- the workshop of London;
- a distinct and leading part of London.

A comprehensive suite of 93 policies then follow, both strategic and more focused development management policies. This report identifies those likely to be relevant to the Regional Park and the delivery of the Authority’s proposals and key projects. Formal detailed comments are set out in the letter attached at Appendix A to this report.

**9 Spatial Strategy**

The Spatial Strategy set out in draft Strategic Policy SP SS1 proposes provision for at least 25,000 new homes up to 2039 and is based on the ‘Medium Growth’ option. This includes Green Belt release with small sites on the edge of the urban area providing for additional housing and employment development. A large proportion of the Borough’s future development needs are to be provided by the four main placemaking areas of Meridian Water, Southbury, Crews Hill and Chase Park. It should be noted that Site Allocations for residential development do not take forward the Pickett’s Lock Lane site submitted by the Authority under the Call for Sites process.

**10** To meet the Borough’s economic needs, the plan is looking to provide 251,500sqm of net additional industrial and logistics floor space (56ha of additional land) and 37,000sqm of net additional office floorspace. These employment needs are to be met through the intensification of existing industrial areas, and new sites in urban and rural locations, including the development of selected sites in the Green Belt. Rammey Marsh West is included as a Site Allocation for approx. 70,200sqm of industrial/employment use. It remains in the Green Belt however, as Green Belt boundaries are to be determined as part of the Reg 19 version of the Local Plan (proposed summer 2022).

**11** Rural areas are to be managed for ambitious nature recovery and rewilding and a mosaic of sustainable countryside uses including food production, forestry, ecotourism, recreation, education, leisure, sporting excellence and natural burial.

**12 Placemaking**

Of the ten placemaking areas, two are relevant to the Park; 'Meridian Water' (which Members considered previously under Report RP/33/19) and 'Rural Enfield'. The latter is a new policy concept and refers to an arc of open spaces and woodland extending from Trent Park and Crews Hill in the west and north of the borough through to land within the Regional Park at Rammey Marsh and south through to the North Circular. The policy aims to protect and enhance this area to create a leading outdoor countryside and leisure destination as part of London's National Park City. A Placemaking vision and policy requirements are set out for each area (PL5 and PL8 respectively) and these are to be used to inform investment decisions and guide development proposals. Diagrams of these two areas are reproduced from the draft Local Plan at Appendix C to this report.

**13 Blue and Green Enfield**

Policies under this section of the Plan cover the 'green' (e.g. parks, open spaces, woodland, street trees and footpaths) and 'blue' (e.g. reservoirs, lakes and waterways) elements of Enfield's infrastructure, all of which are relevant to the Regional Park. They also deal with the protection and enhancement of designated nature conservation sites, rewilding and off-setting (SP BG2).

14 Strategic Policy SP BG1: 'Blue and green infrastructure network' sets the framework; with proposals expected to contribute to creating a more integrated, multifunctional and accessible blue and green infrastructure network. This includes measures such as protecting and enhancing the quality and function of Green Belt and Metropolitan Open Land (MOL), and ensuring development achieves biodiversity net gain and maximises opportunities for urban greening. Specific policies relating to the Green Belt and MOL are National Planning Policy Framework (NPPF) compliant; and Pickett's Lock retains its designation as previously developed land (Policy BG5).

15 Other sections of the draft Local Plan containing policies of interest include Section 7 Design and Character, Section 9 Economy, where Rammey Marsh West and land within the Park to the south are identified as site allocations for industrial/employment use, Section 11 which includes policy for Rural Enfield and Section 12 which includes policies for leisure, recreation culture and sport.

**COMMENTS ON KEY POLICY AREAS RELEVANT TO THE REGIONAL PARK****16 Placemaking Section 3**

**Strategic Policy PL5: Meridian Water:** The Authority has previously supported the vision for this comprehensive residential-led, mixed use development, in particular the creation of new open spaces and wetlands within the Park boundary south of the North Circular. The detailed placemaking 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. A clearer statement is required within the placemaking vision and policy about the need to establish attractive and safe walking and cycling links through to Pickett's Lock in the north – it is a destination in its own right and should be recognised as such, together with areas of the Park to the south.

17 There is also some concern about the potential demands policy is placing on the

waterways within this area – they are seen as accommodating multiple uses; public realm, access route, water sports and ecological resource. It is unlikely that all these functions can be successfully achieved, especially in terms of maintaining biodiversity. Further thought should be given to the primary role of the waterways and how policy can balance the various demands placed on these assets.

- 18 Strategic Policy PL8 Rural Enfield:** The Rural Enfield concept is a bold initiative that seeks to pull together the western and northern urban-rural fringe areas of Trent Park, Enfield Chase, Whitewebbs Park with the Regional Park along the borough's eastern edge under the banner of the London National Park City. Proposals include new eco-tourism, recreational, and sporting activities, improved walking and cycling routes, burial space and flood risk mitigation. The re-wilding programme proposed for Enfield Chase (1,000ha of woodland and open space as part of a nature recovery network) together with a new cultural gateway hub is supported. It will be important that this complements the work of the Authority and other stakeholders within the Park, so that a continuity of landscape scale habitats, recreational routes, and visitor facilities can be delivered over the longer term.
- 19** There is concern that the remit of the Regional Park and the Authority's own proposals for the Park are somewhat lost within the overall emphasis of this policy. This is a wider issue than Policy PL8 however, as the draft Local Plan does not include a Lee Valley Regional Park specific policy that supports the Authority's PDF proposals as required by Section 14 (2) of the Lee Valley Regional Park Act 1966. It is suggested that Policy PL8 is amended and a new policy section added which recognises and supports the Regional Park and the PDF Area Proposals as they relate to the Borough. Policy PL8 could be renamed Rural Enfield and the Lee Valley Regional Park. Draft wording is suggested in the letter at Appendix A to this report. The alternative to this would be an additional policy within the Green and Blue section of the Plan; similar wording could be included.
- 20 Sustainable Enfield**  
Policy under this section of the Local Plan can, in principle, be endorsed. The policies aim to achieve the Council's commitments to become a carbon neutral organisation by 2030 and a carbon neutral borough by 2040 in line with their Climate Action Plan. They address the energy implications of new development, requirements to reduce waste, and support effective adaptation to a changing climate. Policies also cover flood risk (SE8), protection and improvement of water courses (SE9) and SUDs (SE10). No further comment is made at this stage in respect of these policies.
- 21 Blue and Green Enfield Section 6**  
Policy that identify measures to overcome issues of physical severance, inaccessibility and the fragmentation of spaces and habitats is supported. Policy BG1 point 2 refers to the prioritisation of a range of future blue-green interventions including expansion of routes into the Regional Park and new continuous and publicly accessible linear parks such as Edmonton Marshes proposed as part of Meridian Water.
- 22** The Regional Park and Pickett's Lock are identified as locations for strategic alternative nature green space or Sustainable Alternative Natural Greenspace (SANG) mitigation in terms of recreational pressure, Policy BG2 Protecting Nature Conservation Sites. This relates to the need to provide mitigation for

development involving over 100 new homes within 6km of the boundary of the Epping Forest Special Areas of Conservation (SAC), (known as the "zone of influence") in order to offset any potential effects arising from increased recreational pressure and air pollution on the Epping Forest SAC. The recommendations of the HRA report accompanying the draft Local Plan propose additional wording that would help clarify policy requirements in this respect and these need to be taken on board in the next iteration of the Plan. Further discussion on these points is also required, to identify appropriate sites within the Park, and to understand what the requirements of SANG mitigation will mean for the long term management of these sites, and the impact on venues and open spaces/sites of nature conservation value.

**23 Green Belt Policy and Pickett's Lock**

Pickett's Lock has retained its description as a major developed site, comprising "substantial areas of previously developed land" (explanatory text para 6.5.5) under Policy BG5 'Green Belt and Edges of the Countryside/urban area'. Policy BG5 allows for the partial or complete redevelopment of previously developed sites, providing usual restrictions in terms of the impact on the openness of the Green Belt and increases in traffic generation are satisfied. However, the designated area of the Pickett's Lock major developed site should be included as a notation on the draft Policies Map. This is referenced in supporting text para 6.55 but not shown on the Policies Map.

- 24** Instead, a Site Allocation SA56 'Land at Pickett's Lock' is shown on the draft Policies Map but this covers only a portion of the Pickett's Lock site and is keyed on the map as 'Preferred Option for Spatial Growth Sporting/Leisure', please refer to Appendix D to this report. This allocation relates to Policy CL4 'Promoting Sporting Excellence'. Whilst this is helpful, further clarity is required regarding these designations. It is understood the site allocation shown as SA56 came forward as part of the Call for Sites process. Officers are liaising with the Council and will be submitting a revised allocation that properly reflects the extent of the Authority's ambition for the redevelopment of Pickett's Lock in accordance with the PDF Area Proposals and current joint working on The Wave London proposal. Pickett's Lock is a strategic site within the east of the Borough and the Council is aware of the Authority's commitment to secure a major leisure investment for a significant part of the site, which will require a site wide approach in planning terms. The Local Plan will need to provide a clear policy steer to support new major leisure investment at the Lee Valley Leisure Complex at Picketts Lock.

**25 Economy Section 9**

The Evidence Base work for the Local Plan has identified a net additional need for both industrial/logistics space and office space within Enfield which cannot all be accommodated solely within the urban area. Hence the Borough's preferred option (presented for discussion) to develop selected Green Belt sites in addition to urban sites with the potential to meet approximately 98% of industrial and logistics needs. Two sites within the Park and the Green Belt – Rammey Marsh West and land south of Rammey Marsh West and north and west of Innova Park are identified as having potential to offer an uplift in floorspace.

- 26** This option has recognised the potential of Rammey Marsh West for employment/industrial use as proposed by the Authority through the 'Call for Sites' process, (report RP/31/19). 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 5.7ha, Transport for London (TfL) 5ha, and the Council own a small area. It has been identified in the Site Allocation proforma as suitable for approx. 70,200sqm of new employment floorspace, (light industrial, general industrial storage and distribution and related sui generis). Currently the site remains in the Green Belt – it is understood Green Belt boundaries will be determined as part of the Local Plan Regulation 19 consultation. The land to the south adjacent to Innova Park is also within the Park and Green Belt and would clearly complement the Rammey Marsh West allocation. This site is considered suitable for approx. 16,445sqm of new employment floorspace. Both proformas are included as Appendix E to this report.

- 27 Notwithstanding the allocation of Rammey Marsh West for employment purposes it is important that the development of this site and the adjoining area north of Innova Park take account of their location within the Regional Park and the proximity of adjoining open spaces. This could be identified within the site allocation proforma for these sites to ensure any development on the site is designed in a manner that will improve environmental quality and contribute to the blue and green network within which it is placed. Elements within other policies could apply, for example policy SP E5 point 3 which offers policy guidance for environmental and amenity enhancements to transform strategic and locally significant industrial sites.

**28 Culture Leisure and Recreation**

It would be helpful if policies under this section, such as Strategic Policy CL1 'Promoting culture and creativity', could offer more specific support for the growth of existing and new leisure, cultural and sporting facilities in relation to the Regional Park, as well as town centres and regeneration areas, particularly in view of established venues and locations such as the Lee Valley Leisure Complex. It is also of concern that Policy CL3 Visitor Accommodation makes no reference to the Regional Park as a location for potential visitor accommodation facilities and yet these feature within a number of sites in the Park, including at Pickett's Lock. Visitor accommodation can be an integral part of new leisure development and is certainly under consideration as part of The Wave proposal. A reference to the Regional Park is sought under CL3 point 4.

**29 Policy CL4 'Promoting Sporting Excellence**

The first part of Policy CL4 'Promoting Sporting Excellence' supports development and investment decisions which will facilitate and contribute towards the development of first-class, publicly accessible, strategic sport and leisure facilities to meet the needs of the growing population, identifying Pickett's Lock/Lee Valley Leisure Complex as a priority location in this respect, (Policy CL4 bullet1.b.ii). This should prove helpful to the Authority's investment plans for Pickett's Lock, which are currently focused on The Wave. Disappointingly Site Allocation SA56 'Land at Pickett's Lock' which indicates new sports, leisure and recreation facilities, delineates the cinema and adjacent land including the car park only - an area of 6.5ha. As mentioned above discussions are underway with Enfield officers to revise the extent of the area included and to clarify the position regarding the Pickett's Lock major developed site within the Green Belt.

**30 Delivering and Monitoring Section 15**

Strategic Policy D1 securing contributions to mitigate the impact of development sets out key priorities for Community Infrastructure Levy (CIL) and Section 106 funding with Affordable Housing as the key priority and tackling climate change, parks and open spaces as top amongst the 'other priorities'. The Infrastructure

Delivery Plan will continue to play a key role to set out those projects that will receive developer contributions and the Authority has fed projects into this process in previous years. This will be another matter to follow up in discussion with Council officers.

### **ENVIRONMENTAL IMPLICATIONS**

- 31 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**

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

### **HUMAN RESOURCE IMPLICATIONS**

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

### **LEGAL IMPLICATIONS**

- 34 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.
- 35 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**

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

### **EQUALITY IMPLICATIONS**

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

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### **BACKGROUND REPORTS**

Enfield Local Plan Main Issues and Preferred Options Reg 18  
Consultation

June 2021

**PREVIOUS COMMITTEE REPORTS**

Regeneration & Planning Committee	RP/30/19	Consultation by London Borough of Enfield Local Plan Reg 18 Issues and Options	14 February 2019
Regeneration & Planning Committee	RP/31/19 (Part 2)	Planning Consultation by the London Borough of Enfield on the Draft Local Plan: Call for Sites	14 February 2019
Regeneration & Planning Committee	RP/33/19	Planning Consultation by the Borough of Enfield on Two Applications, A Full Application For Strategic Infrastructure Works and an Outline Application for a Mixed Use Residential Led Development both Relating to Meridian Water	19 September 2019

**APPENDICES ATTACHED**

Appendix A	The Authority's draft response to the London Borough of Enfield
Appendix B	Plan showing the Park area within the borough of Enfield
Appendix C	Meridian Water & Rural Enfield Placemaking
Appendix D	Draft Local Plan Site Allocation Pickett's Lock
Appendix E 1 & 2	Site allocations for Rammey Marsh West and land north west Innova Park

**LIST OF ABBREVIATIONS**

PDF	Park Development Framework
SSSI	Site of Special Scientific Interest
SANG	Sustainable Alternative Natural Greenspace
HRA	Habitat Regulations Assessment
Reg 18	Local Plan Regulation 18
IIA	Integrated Impact Assessment
SA	Sustainability Appraisal
SEA	Strategic Environmental Assessment
HIA	Health Impact Assessment
EqIA	Equalities Impact Assessment
CSIA	Community Safety Impact Assessment
HRA	Habitats Regulations Assessment
ELP	Enfield Local Plan
the Park Act	Lee Valley Regional Park Act 1966
CIL	Community Infrastructure Levy
MOL	Metropolitan Open Land
NPPF	National Planning Policy Framework
SAC	Special Areas of Conservation

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6th September 2021

Dear Helen

**RE: CONSULTATION ON THE NEW DRAFT LOCAL PLAN MAIN ISSUES AND PREFERRED APPROACHES (REGULATION 18 CONSULTATION) - LEE VALLEY REGIONAL PARK AUTHORITY REPRESENTATIONS**

Thank you for consulting the Regional Park Authority on the new Draft Local Plan Main Issues and Preferred Approaches document (Regulation 18 consultation).

A report on this matter was considered by the Authority's Members at the Lee Valley Regeneration and Planning Committee on the 6<sup>th</sup> September 2021 when the following comments were agreed. Recent meetings between officers have already proved useful on key matters relating to the Local Plan and sites within the Regional Park and further more detailed discussion on the matters raised below would be welcome, particularly in relation to the Pickett's Lock site allocation and the detail for industrial site allocations within the Regional Park.

**Draft Local Plan Vision and Objectives**

The Authority notes the comprehensive range of strategic and development management policies included within the current draft Local Plan and endorses the strong emphasis within the spatial vision and its four underpinning themes on establishing a high quality, biodiverse and green environment for the well-being and enjoyment of Enfield's residents, employees and visitors; the Regional Park and the work of the Authority make an important contribution to the vision in this respect.

It would be appropriate therefore for the strategic objectives to include a reference to the Regional Park, potentially under the 'Deeply Green Place' theme. For example, an extra bullet point could be added stating

*"To support the Lee Valley Regional Park Authority in the protection, enhancement and provision of the diverse range of open space, habitats, sporting and leisure venues within the Regional Park in accordance with its Park Development Framework proposals."*

A substantial area of the Regional Park lies within the London Borough of Enfield, (approximately 653 hectares, or 16.27% of the total Park area) and includes sites

such as the open spaces of Rammey Marsh, the King George V and William Girling reservoir SSSI, Enfield Lock and the Lee Navigation, the Lee Valley Athletics Centre and Pickett's Lock and land either side of the North Circular Road. PDF Area Proposals for the Park area within Enfield were adopted in April 2013 and focus on improved visitor facilities and public access, redevelopment of Pickett's Lock as a strategic leisure destination, and habitat enhancements at Rammey Marsh and Swan and Pike Pool. Partnership working is also highlighted as a key mechanism for habitat and public access improvements, particularly in relation to the large areas of water in this area; the reservoirs, Lee Navigation and at Ponders End Waterfront.

### **Lee Valley Regional Park and Placemaking**

The main concern with the current plan is the lack of specific policy support for the Lee Valley Regional Park and the Park Development Framework proposals. The current Core Strategy includes support for the Park under Policy 35 and an equivalent is sought within the new Local Plan in order to satisfy the requirements of the Park Act 1966. A policy statement supporting the adopted Park Development Framework Area proposals as they relate to the Park within Enfield would fulfil the requirements of the Park Act Section 14 (2) (a); explanatory text should set out the statutory role of the Park Authority and its planning functions; examples of text to be included are attached as Appendix A to this letter.

This additional policy could sit within the Placemaking section of the Plan, potentially by adding a new second part to Policy PL8 Rural Enfield, given that the Regional Park makes up the eastern half of the 'Rural Enfield – London National Park City' designation. Placemaking Policy PL8 could be renamed 'Rural Enfield and the Lee Valley Regional Park'. Alternatively, the policy could be included within the 'Blue and Green Enfield' section 6 of the Plan, given the Regional Park is a significant element of the Borough's green and blue infrastructure. The following wording is proposed as a starting point for discussion with explanatory text included in Appendix A:

#### **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.*

#### **Placemaking Meridian Water Policy PL5.**

The Placemaking vision for Meridian Water is supported and detailed policy guidance for this area 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. Reference to the Lee Valley BAP is welcomed under bullet point 5 as is the requirement that planting must be consistent with the habitats and character of the Lee Valley Regional Park.

A clearer statement is required within the placemaking vision and policy about the need to establish attractive and safe walking and cycling links through to Pickett's Lock in the north and areas of the Park to the south. Reference is made (bullet point 9) to the need for Development to "deliver new strategic connections from Meridian Water to key destinations (such as Edmonton Green, North Middlesex Hospital and Angel Edmonton) and neighbouring Boroughs (via the Lee Valley Regional Park) to

overcome physical severance", but Pickett's Lock should be named as a key destination in its own right and the policy emphasis should be on walking and cycling connections. Likewise, connections through to the south at Tottenham Marshes and to the wider extent of the Park beyond need to be highlighted to present the full scope of open spaces and leisure opportunities available and which will be on the doorstep for the new residents and employees of Meridian Water.

The Authority is supportive of the aspiration for the enhancement of the river and to encourage the public connection to the waterways, however the need for space for nature should not be overlooked. Within emerging designs refuge or quiet areas should be incorporated to enable species with a large home range, such as otter to both move through and rest up. Similarly, for species such as Water Vole to colonise and establish territories, breed and thrive there is a need for undisturbed areas.

Concern remains however about the demands policy is potentially placing on the waterways within this area – the waterways are identified in policy as part of the public realm, a focal point for cultural activity, with access routes alongside, and an important ecological resource. Bullet point 11 proposes the Lee Navigation as a venue for water sports facilities. Further thought should be given to the primary role of the waterways and how the various demands can be balanced. There is a similar concern in respect of the detail of Policy BG7 'Watercourses'.

### **Placemaking Rural Enfield PL8**

The Strategic Policy 'Rural Enfield – a leading destination in London's National Park City' is an interesting concept and the Authority would welcome the opportunity to engage with the Council on this topic and consider how the concept might align with the Regional Park. A process of collaborative working would be beneficial on matters such as visitor hubs, recreational routes and landscape scale habitat creation and connectivity.

The re-wilding aims of the policy are supported in principle as is the new cultural gateway hub proposal for Enfield Chase. The policy also includes proposals for improved hubs of sporting excellence at Tottenham Hotspur training ground and Ponders End (PL8 h) but does not mention the Athletics Centre at Pickett's Lock. This site does not appear to be included within the placemaking policy designation and the Authority would question why this is the case? This is a key site within the Regional Park and would be a major asset to the London's City Park and Rural Enfield designation.

### **Blue and Green Enfield**

#### **Strategic Policies BG1 and BG2**

The Regional Park forms a significant part of the Borough's blue and green infrastructure resource. Policy within this section is in general supported and references to the Regional Park welcome particularly where they identify measures to overcome issues of physical severance, inaccessibility and the fragmentation of spaces and habitats. In particular, Policy BG1 point 2. which refers to the prioritisation of a range of future blue-green interventions including expansion of routes into the Regional Park and new continuous and publicly accessible linear parks such as Brooks Park and Edmonton Marshes which are proposed as part of Meridian Water.

Reference to the "revitalisation of open spaces and leisure/recreational activities at Banbury Reservoir, Picketts Lock, Hotspur Way, Ponders End and Whitewebbs Park" under BG1 2.j. is also noted.

Policy BG2 Protecting Nature Conservation Sites includes a reference to the need for development involving over 100 new homes within 6km of the boundary of the Epping Forest SAC, (known as the "zone of influence") to secure appropriate mitigation and avoidance measures in the form of strategic alternative nature green space (SANG) to offset any potential effects arising from increased recreational pressure and air pollution on the Epping Forest SAC. The LVRP and Pickett's Lock are identified as locations for SANG mitigation in terms of recreational pressure.

The Authority's officers would welcome further discussion on this point in due course, a similar discussion is underway with officers at Waltham Forest who are working on a SANGS SPD. It will be necessary to understand the implications of the HRA Report and its recommendations for revising policy to ensure "the Local Plan provides specific guidance on the circumstances in which SANG, developer contributions and/or project level HRA will be needed, and the quantities required" and that this is referenced in policy text (paragraph 6.10).

It will be important to identify appropriate sites within the Park to meet the requirements of SANG mitigation and understand what this will mean 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.

#### **Green Belt Policy and Pickett's Lock**

Most of the Park within Enfield is designated as Green Belt. It is noted that Pickett's Lock has retained its description as a major developed site in the Green Belt containing 'substantial areas of previously developed land' (explanatory text para 6.5.5) under Policy BG5 'Green Belt and Edges of the Countryside/urban area'. This is welcome and links to the policy (BG5 2.) which allows for the partial or complete redevelopment of previously developed sites in accordance with restrictions in terms of the impact on the openness of the Green Belt and increases in traffic generation.

However, the draft Policies Map does not indicate the designated area of the Pickett's Lock major developed site; there has previously been considerable debate between officers as to the area that might constitute previously developed land given the site's planning history and the permanence of structures, hardstanding etc as part of the major developed site. However, the current draft Policies Map shows only the Site Allocation SA56 keyed on the map as 'Preferred Option for Spatial Growth Sporting/Leisure' and which covers a portion of the site relating to the car park and cinema and does not for example include the camp site, athletics centre or site of the previous leisure centre.

There should be a much greater emphasis within the Local Plan on the strategic importance and potential of Pickett's Lock in the eastern part of the Borough. The Council is aware and indeed has been generally supportive of the Authority's commitment to secure a major leisure investment in the site relating to the whole Pickett's Lock site and which will require a site wide approach in planning terms. Following an initial Duty to Co-operate meeting the Authority would wish to discuss this point in further detail and it has been agreed that a revised site allocation for Pickett's Lock will be provided that better reflects the Authority's ambitions for the site

in accordance with the Park Development Framework Area Proposals and current joint working on The Wave London project. Likewise, Council officers will be advising on the 'missing' Policies Map notation for major developed sites in the Green Belt which should apply to Pickett's Lock. The Authority may wish to comment further on this point in due course.

#### **Other Blue Green Policy**

The main thrust of Policy BG 7 Watercourses is supported; the aim to protect, enhance and maintain the quality of the network of watercourses. The requirement for development to incorporate suitable setbacks to protect the water's edge is endorsed; this will be important within the Meridian Water development and protecting the River Lee Navigation. The policy requirement for the siting of marinas and commercial/residential moorings away from the main course of the River Lee and Navigation is supported (Policy BG7 bullet point 3).

Policy BG8 Urban Greening and Biophilic Principles, which seeks to maximise opportunities to green the borough's urban and more rural environment, including the Regional Park is supported. As the Plan acknowledges measures such as green/brown roofs, living walls, trees and soft landscaping treatments, will have multiple environmental benefits for biodiversity, flood mitigation, urban cooling as well as improve the quality and aesthetic value of the area if appropriately implemented and maintained over time.

#### **Design and Character**

The detail of policy relating to Design and Character is welcomed. Policy DE5 Strategic and Local Views is supported. It identifies the long distance views out from the Park at Rammey Marsh across to the open countryside beyond the M25 as important. Similarly, a number of other views across the Park (and the Borough) from outside Enfield to the east are also identified. Policy seeks to ensure development positively contributes to the setting and integrity of these views as they make a significant contribution to the character and identity of the Borough. The protection and significance of views out from and across the Park are recognised in PDF Area Proposals particularly in relation to Rammey Marsh.

The Area of Special Character designation is retained across the majority of the Regional Park on the draft Policies Map; it also covers the Rural Enfield area (also the London National Park City area). Policy DE11 Landscape Design sets out the requirements for proposals within this designation and this detail is welcomed. It seeks to ensure landscape character and distinctiveness including its biodiversity, cultural value and tranquillity are restored, conserved and enhanced as part of development proposals.

#### **Housing**

Policy SP H1 Housing Development Sites identifies a list of sites to be allocated for housing development but it is noted that the site 'Pickett's Lock Lane' which the Authority submitted for potential residential development under the Call for Sites process has not been included. This has been raised with officers at Enfield and further discussion on this matter would be helpful.

Gypsy and Traveller accommodation requirements are to be considered as part of a separate Gypsy and Traveller Local Plan, DM H10. Officers would welcome involvement with this document if it is likely to impact land within the Park.

## **Economy**

Draft Strategic Policy E1 Employment and Growth has identified two sites within the Park as suitable locations within the green belt for industrial and logistics development;

- Rammey Marsh West, (SA52) part of which, 5.7ha is owned by the Authority and
- land south of Rammey Marsh West (SA55) which lies to the north and west of Innova Park.

Site proformas presented for each are noted as is their status as policy indicating key requirements and considerations that need to be taken into account as sites come forward for development.

The Rammey Marsh West allocation was proposed by the Authority and is supported in principle. Including the land north of Innova Park offers an opportunity to look comprehensively at what can be achieved in this area and 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 this respect the Site proformas are lacking in detail and should address the location of both this site and SA55 in terms of the Regional Park and the comprehensive environmental, ecological, landscape and access improvements that would be required. Further information is also sought regarding the Green Belt status of these sites – it is understood Green Belt boundaries will be determined as part of the Reg 19 Local Plan process.

It would also be helpful to understand the policy requirements for the Rural Enfield Strategic Policy PL8 in terms of these site allocations. The inclusion of ecological enhancements within SA52 as part of its redevelopment would assist in strengthening the links between the Regional Park and Enfield Chase as part of the arc of open spaces identified.

## **Rural Enfield Chapter 11**

There is a tendency for policy under this section of the Plan to overlap with other policy sections; for example between the development management policy DM RE1 'Character of the Green Belt and open countryside', the placemaking Strategic Policy PL8 'Rural Enfield, and Strategic Policy BG5 'Green Belt and edge of countryside/urban area' The Regional Park is part of the borough's Green Belt but can also be considered as part of the urban fringe given its proximity to the urban edge along the eastern side of the borough. It is unclear what Policy RE1 contributes to the Local Plan over and above the other two aforementioned policies.

However, the specific requirements included for new development set out in Policy RE2 'Improving access to the countryside and green corridors' are supported particularly those that give priority to

- improving public access to key attractions such as the Lee Valley Regional Park,
- creating interconnected routes that link with open spaces along river corridors, including the Lee Navigation, the London Loop and Lee Valley Walk and

- extending links and the right of access into the open countryside to facilitate the creation of a major green corridor from Lee Valley Regional Park to Enfield Chase (London National Park City designation PL8).

## **Culture Leisure and Recreation**

### **Strategic Policy CL1 Promoting culture and creativity**

The Local Plan recognises the contribution that the leisure and visitor experience can make to economic growth and this is welcomed. It is important that policy enables both the protection of existing facilities and the growth and expansion of new attractions. It would be helpful if both strategic and development management policies could offer more specific support for the Regional Park in this respect. Strategic Policy CL1 Promoting culture and creativity seeks to direct new arts, culture and entertainment towards the Borough's regeneration areas and town centres which is understandable given the accessibility of these locations. The Regional Park contains established venues and locations for leisure and entertainment and should also be identified as a suitable location, in particular the Lee Valley Leisure Complex, a strategic location within the east of the Borough.

Clarity is also sought in relation to Policy DM CL2 Leisure and Tourism. This supports proposals that will "continue to develop a high-quality visitor experience to increase the contribution that tourism, arts and cultural heritage and sport make to our quality of life and social well-being" in particular where these proposals "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". Reference to Lee Valley should be Lee Valley Regional Park.

### **Policy CL3 Visitor Accommodation**

Policy CL3 Visitor Accommodation makes no reference to the Regional Park as a location for potential visitor accommodation facilities and yet 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. It is being actively considered as part of The Wave proposals. Policy CL3 should be amended to include a reference to the Regional Park under CL3 point 4, (see text in red bold 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*

### **Policy CL4 'Promoting Sporting Excellence**

The first part of Policy CL4 'Promoting Sporting Excellence' supports development and investment decisions which will facilitate and contribute towards the development of first-class, publicly accessible, strategic sport and leisure facilities to meet the needs of the growing population, identifying Pickett's Lock/Lee Valley Leisure Complex as a priority location in this respect, (Policy CL4 bullet point 1.b.ii). This statement offers potential support for the Authority's current investment proposals for Pickett's Lock which include The Wave.

Site Allocation SA56 is referenced in the policy in respect of Pickett's Lock and this identifies 'Land at Pickett's Lock for new sports, leisure and recreation facilities. Unfortunately, the site area outlined identifies the cinema and adjacent land including

the car park only – an area of 6.5ha. The Authority would wish to see a much more extensive area included given the leisure and sporting activities across the wider site. It is also confusing that explanatory text to the policy groups together the Hotspur training ground, Pickett's Lock, Enfield Playing Fields and Firs Farm as suitable locations for the development of world-class sports villages – this is not a proposal that the Authority has identified for Pickett's Lock.

As mentioned above and in the initial Duty to Co-operate meeting, the Authority would welcome further detailed consideration of this policy and the Site Allocation to ensure it captures the full potential of the Pickett's Lock as a strategic site, reflects the correct area within the site allocation and provides support and guidance for future leisure development.

#### **Delivering and Monitoring Section 15**

Officers would welcome sight of the current version of the Infrastructure Delivery Plan accompanying the draft Local Plan and further discussion on its contents, particularly in relation to the priorities for funding identified under Policy SP D1. In the past relevant projects identified by the Authority and referenced in the PDF have been included and clearly this is an important mechanism going forward.

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**

**Appendix A to Letter LVRPA Policy and Explanatory Text**

**Lee Valley Regional Park Policy**

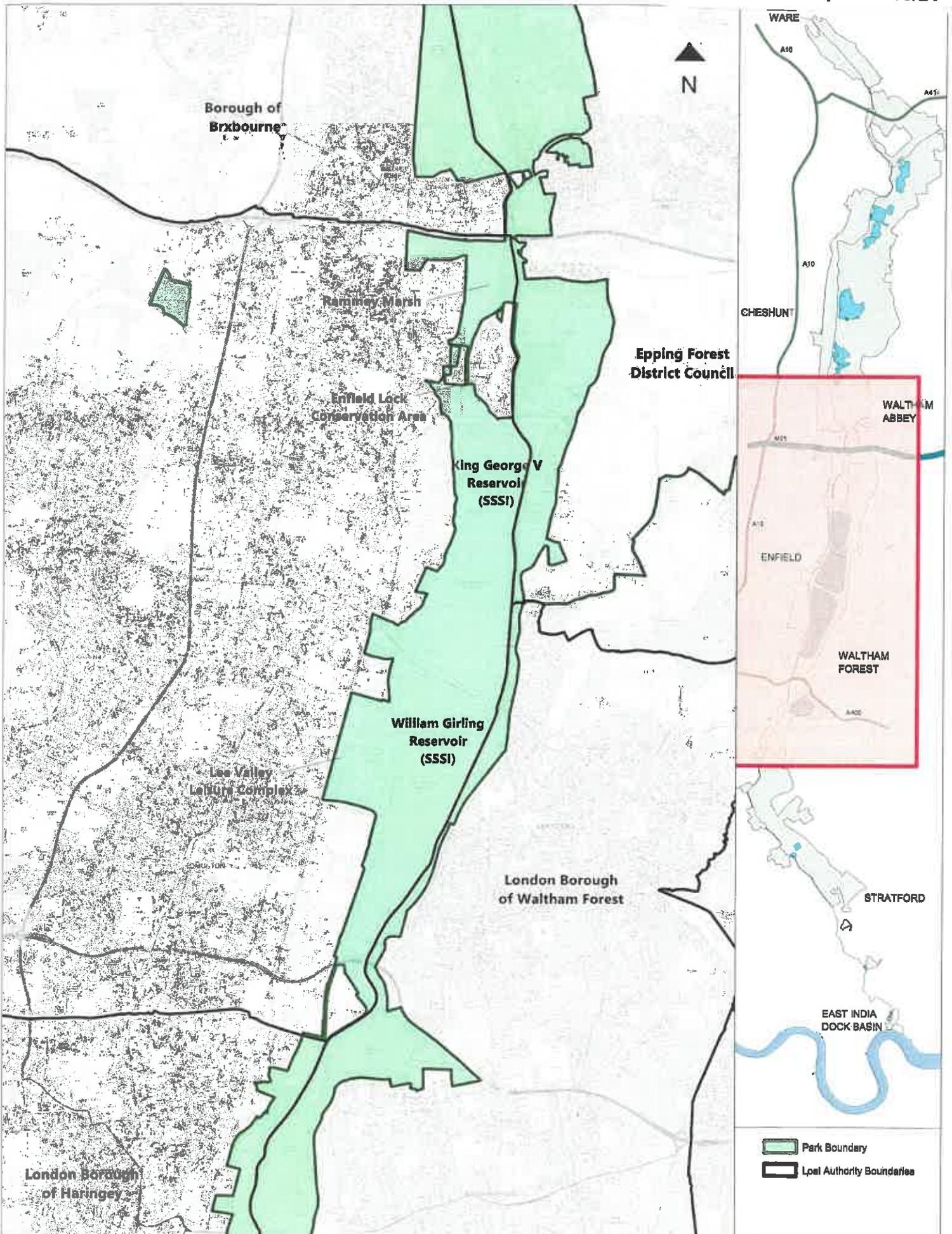
**The Council will support the work of the Lee Valley Regional Park Authority to realise the full potential of the Regional Park in accordance with the Park Development Framework proposals and to deliver a diverse range of open green and blue spaces, habitats and ecological enhancements, major sporting 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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Lee Valley Regional Park within London Borough of Enfield



NTS @ A4  
12.07.21

Produced by: Corporate GIS (AAB)

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**Extracts from the Enfield Draft Local Plan showing Placemaking Areas  
Meridian Water and Rural Enfield**



**Existing features**

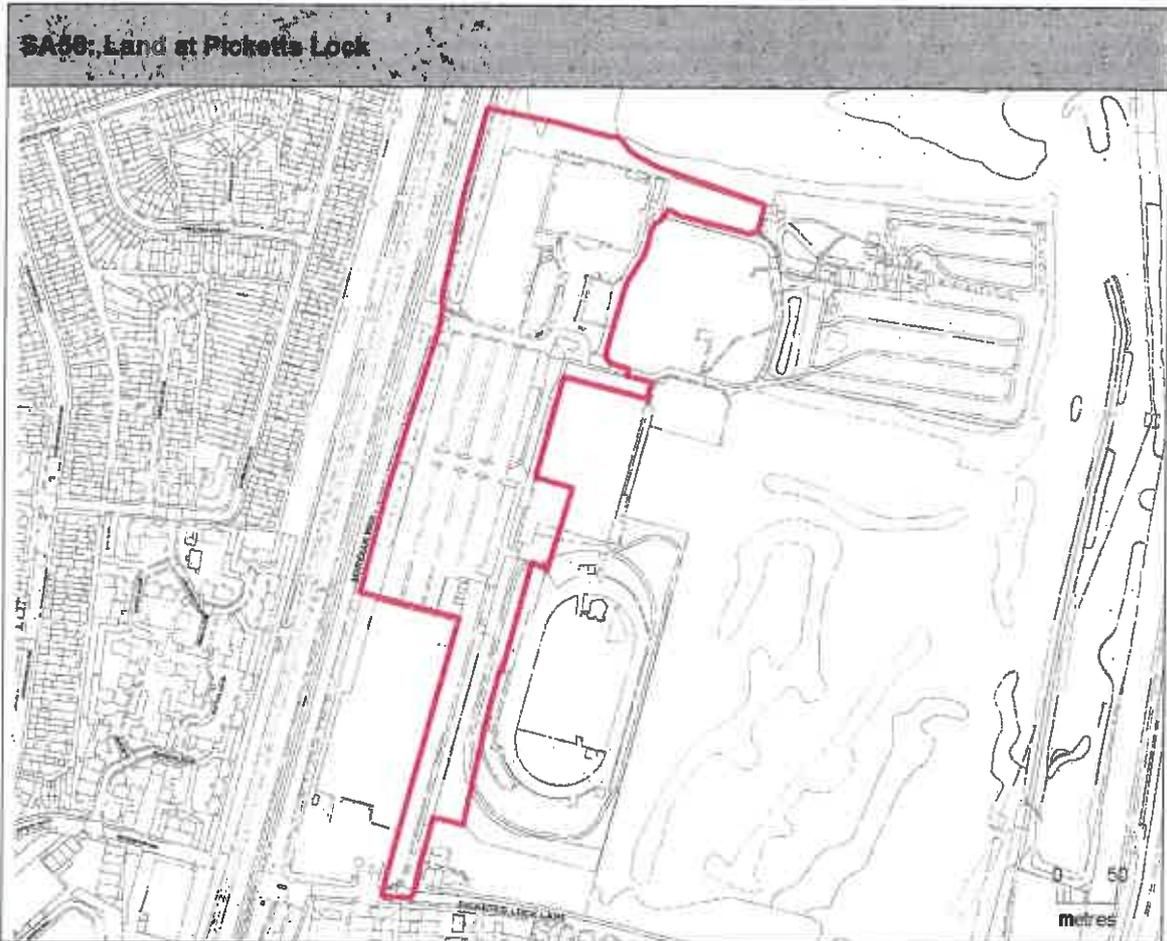
- Borough boundary
- Station
- Open Space
- Water
- Conservation Area
- Listed Buildings
- Local Heritage Assets
- Registered parks and gardens
- Constructed wetlands - existing
- Rain gardens
- Existing woodlands
- Completed cycle route

**Opportunities**

- Place making area
- Site Allocations
- Green Loop
- Green Links
- Enhanced access to blue/green infrastructure
- Improvements to walking route
- New walking route opportunity
- Proposed cycle route
- Green buffer/tree lined road
- New open space opportunity
- Improvements to open space
- Constructed wetlands - opportunities
- Public realm opportunity
- Streetscape improvements/active frontages
- Intensification opportunity
- Railway arches - regeneration opportunity



Other Site Allocations



<b>Existing Site Information</b>			
Address	Land at Picketts Lock, N9 0AS		
Site Area	6.5ha.		
Existing Use(s)	Cinema and adjacent land including car park		
<b>Site Considerations</b>			
Flood Zone	1		
PTAL	1b		
Heritage Considerations	None		
Impacts an Archaeological Priority Area	None		
<b>Proposal</b>			
Land Use Requirements	<ul style="list-style-type: none"> <li>The site should provide new sports, leisure and recreation facilities</li> </ul>		
<b>Implementation</b>			
Timeframe for Delivery	0-5 years	5-10 years	10+ years
	-	X	-
<b>Estimated capacity by proposed Land Use</b>			
Growth Scenario / Spatial Strategy	Baseline / Urban Area only	Medium / Urban area + Green Belt	
Capacity Estimate	Sports, leisure and recreation facilities only	Sports, leisure and recreation facilities only	

Other sites outside the placemaking areas – Site Allocations

SA52: Land West of Ramney Marsh			
<b>Existing Site Information</b>			
Address	Ramney Marsh Mollison Avenue.		
Site Area	12.01ha		
Existing Use(s)	Open land		
<b>Site Considerations</b>			
Flood Zone	1		
PTAL	1a		
Heritage Considerations	None		
Impacts an Archaeological Priority Area	None		
<b>Proposal</b>			
Land Use Requirements	<ul style="list-style-type: none"> <li>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.</li> </ul>		
<b>Implementation</b>			
Timeframe for Delivery	0-5 years	5-10 years	10+ years
	-	X	-
<b>Estimated capacity by proposed Land Use</b>			
Growth Scenario / Spatial Strategy	Baseline / Urban Area only	Medium / Urban area + Green Belt	
Capacity Estimate	-	Approx. 70,200sqm of Industrial	

Other sites outside the placemaking areas – Site Allocations

SA55: Land to the North West of Innova Park			
<b>Existing Site Information</b>			
Address	Land to North West of Innova Park, EN3 7XY		
Site Area	3.2ha		
Existing Use(s)	Unused		
<b>Site Considerations</b>			
Flood Zone	1		
PTAL	1b		
Heritage Considerations	None		
Impacts an Archaeological Priority Area	None		
<b>Proposal</b>			
Land Use Requirements	<ul style="list-style-type: none"> <li>• Redevelopment should:                             <ul style="list-style-type: none"> <li>○ Provide at least 16,445 sq m of new employment floorspace (light industrial, general industrial, storage and distribution, and related sui generis) floorspace.</li> <li>○ Address highways impacts of development.</li> <li>○ Mitigate flood risk</li> </ul> </li> </ul>		
<b>Implementation</b>			
Timeframe for Delivery	0-5 years	5-10 years	10+ years
	-	X	-
<b>Estimated capacity by proposed Land Use</b>			
<b>Growth Scenario / Spatial Strategy</b>	<b>Baseline / Urban Area only</b>	<b>Medium / Urban area + Green Belt</b>	
Capacity Estimate	Approx. 16,445 sq m of Industrial	Approx. 16,445 sq m of Industrial	

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