



**LEE VALLEY REGIONAL PARK AUTHORITY**

**REGENERATION AND PLANNING  
COMMITTEE**

**14 02 2019 AT 12:00**

**Agenda Item No:**

**6**

**Report No:**

**RP/30/19**

**PLANNING CONSULTATION ON THE LONDON BOROUGH OF  
ENFIELD DRAFT LOCAL PLAN**

Presented by the Head of Planning and Strategic Partnerships

**SUMMARY**

London Borough of Enfield have just published its draft Local Plan for consultation. The Plan will guide the nature of new development across the Borough for the period 2019-2036. The publication of the draft plan is timely given the Authority's joint project with 'The Wave London' where a major commercial surfing and activity centre is proposed at the LV Leisure Centre, Picketts Lock. An up to date policy framework will be necessary to create the opportunities for this to proceed. The Council's proposed strategic growth options which are required to accommodate a projected population growth of 61,000 people offer considerable scope for the Authority to work with the Council to mutual advantage. There are other matters of detail where further references are required in draft policies and supporting text to the Regional Park. The draft Plan is accompanied by a 'call for sites' and a separate report is included under Part 2 of this agenda.

**RECOMMENDATIONS**

Members Approve: (1) the comments included in the draft letter at Appendix A to this report

**BACKGROUND**

- 1 London Borough of Enfield contains several key sites within the Regional Park including William Girling and the King George V reservoirs, the Lee Valley Leisure Complex (LVLC), Enfield Lock and Rammey Marsh.
- 2 The London Borough of Enfield adopted its Core Strategy in 2010. Following the Localism Act 2011, local planning authorities are required to prepare Local Plans and in 2015. The Lower Lee Valley Regeneration and Planning Committee agreed a response to a discussion paper on the draft plan (Paper LLV/183/16) and a response to the 'call for sites' (Paper LLV/181/16). In summary the Authority expressed some reservations over the impacts of new development to be concentrated in the east of the Borough which could damage the Regional Park's environmental qualities.

- 3 The new plan will inform and influence new development for the period 2018-2036. The publication of the Local Plan is timely as it will take on board the revised National Planning Policy Framework (2018), the draft London Plan (2017) and respond to the challenges and opportunities posed by the anticipated housing growth targets of 1800 dwellings per annum and the proposed Crossrail 2 project. Once adopted it will replace the Council's Core Strategy and the Development Management document.

## KEY POLICY AREAS

- 4 The draft plan is predicated around the notion of 'good growth' defined in the draft London Plan. This seeks to ensure that new development is both socially integrated and sustainable. During its 'life', it is anticipated that the Borough's population will increase by 61,000 to 335,000 requiring an additional 18,000 new dwellings.
- 5 The Council's draft plan is informed by 4 strategic objectives:
  - A Place for Affordability;
  - A Place of Opportunity and Enterprise;
  - A Place for Diversity and Equality; and
  - A Place that Delivers.
- 6 To accommodate the anticipated scale of growth the Council has identified several spatial options where new development could be concentrated:
  - Main town centres and areas around stations.
  - Movement corridors and linear Gateways.
  - Existing estate renewal and regeneration programmes in the eastern corridor and low density industrial estates. These could involve the introduction of mixed use development in areas which are currently designated solely as employment areas.
  - Future Crossrail growth corridor – this relates to strategic modelling studies completed by the Council which have apparently indicated that there is a 40,000 'housing requirement' to make Crossrail 2 a reality in Enfield. For this to be met there would have to be a 'strategic reconfiguration' of land within the eastern corridor.
  - The New Southgate and Lee Valley Opportunity Areas, and
  - Strategic plan led Green belt release. This could involve the release of land around Crews Hill station in the north west of the Borough.

The plan is open to comment on these each of these options.

- 7 The plan includes the full range of policies covering town centres, retail, housing, heritage, tall buildings and employment. The development of Meridian Water is the focus for the delivery of growth options, currently estimated at 10,000 new dwellings supported by a new commercial vision seeking to attract jobs in 'high end' manufacturing, 'E' commerce and pharmaceuticals.
- 8 The policies on Green Belt are in line with the adopted National Planning Policy Framework (NPPF 2018) and the emerging London Plan. In summary, these seek to protect the openness and permanence of land designated as Green Belt. The only exception to this is the option to consider a strategic release of



land for housing at Crews Hill in the north west of the Borough. There is one reference to the Lee Valley Leisure Centre at Picketts Lock which retains its current policy designation as a 'major developed site' in the Green Belt. The draft plan does reference that a Green Belt review is underway and it is understood that this will inform the next draft.

- 9 The draft policy on Biodiversity is broadly compliant with the NPPF 2018 which refers to the conservation, restoration and enhancement of priority habitats, ecological networks and the hierarchy of designated sites. Draft policy G14 does not cover restoration or conservation but does refer to protecting, enhancing and improving these sites.
- 10 The Plan references the chronic issues of obesity within the Borough and that several areas experience an under provisions of arts, cultural, leisure and sporting facilities. Whilst draft policy S13 supports these activities there needs to be explicit reference within this policy and its supporting text to the importance of the Lee Valley Leisure Complex at Picketts Lock in addressing these matters.
- 11 A range of policies seek to 'protect and enhance' the Borough's Blue Ribbon network through sustainable drainage systems (SUDs) and other measures. These policies do not refer directly to the opportunities afforded by the Lee Navigation and the Regional Park. Policy SUS1 aims to ensure no loss in local environmental quality. Policy SUS2 promotes walking and cycling to improve air quality with a specific reference to improving access to green infrastructure. Policies also refer to the need for an assessment of the Borough's 'Natural Capital Account' to be included in planning decisions.
- 12 The draft plan includes a reference to the potential for aggregate extraction in the Lea Valley and states the Council's commitment to engage with landowners and the Authority on this matter.
- 13 Finally, draft policies on Transport seek to secure investment in public transport infrastructure to enhance the 'borough's regeneration potential'. Projects include the promotion of four tracking as a precursor to Crossrail 2 which is considered necessary to promote the delivery of new homes and enable the transformation of low density employment areas into high density, mixed use multi-layered communities served by new stations.

## **APPRAISAL**

- 14 Of the five 'development options' identified, those identified as 'movement corridors', 'regeneration programme' and 'Crossrail 2' each point to investment in the eastern section of the Borough and could affect the Regional Park. The development of 'The Wave' at the LVLC is consistent with these spatial options in this part of the Borough.
- 15 New investment in the eastern corridor either linked to the 'movement corridor' or 'estate regeneration' irrespective of the advent of Crossrail 2 could work to the advantage of the Authority as it reviews its land holdings in this area. The item included on Part 2 of this agenda makes specific recommendations on certain sites. It is suggested that an officer level meeting with the Council as part as part of its duty to co-operate' is held shortly to discuss these matters.
- 16 There needs to be significant change to Policy S13 to reference the importance of the Lee Valley Leisure Complex at Picketts Lock and its role in providing

opportunities for active and passive leisure. Inclusion of a commitment to the site's role as a Regional destination and an acknowledgement of the Authority's work in securing major leisure investment could provide a more positive policy reference to enable the site's development. References would demonstrate the Council's commitment to the regeneration of the eastern and most deprived part of the Borough not just through new housing or employment opportunities but through recreation and leisure to deliver on the Plan's commitment to 'good growth'.

- 17 There needs to be specific references to the importance of the Regional Park and its contribution to the Lee Valley Special Protection Area, Ramsar and the several areas of Sites of Metropolitan Importance for Nature Conservation (SMINCS) which are within the Regional Park within the Borough. Inclusion of a specific reference to the development of 'ecological networks/linkages' to connect with strategic areas of green infrastructure, including the Regional Park is required. Reference to the Authority's recently adopted Biodiversity Action Plan would be consistent with policy intent.
- 18 Other references need to be included in the draft Plan regarding the Regional Park's unique value in providing for cycling and walking routes and its value in improving connectivity of the Borough with adjacent Counties and the London Boroughs. Specific reference to the Authority's emerging Park Development Framework's, Strategic Policies in either text or an Appendix should be included. This would be consistent with Section 14 2) (a) and (b) of the Lee Valley Regional Park Act 1966.

#### **ENVIRONMENTAL IMPLICATIONS**

- 19 Environmental implications arising directly from the content of the draft plan are addressed in the body of this report.

#### **FINANCIAL IMPLICATIONS**

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

#### **LEGAL IMPLICATIONS**

- 21 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 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.
- 22 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**

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

## **EQUALITY IMPLICATIONS**

- 23 There are no equality implications arising directly from the recommendations in this report.
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## **BACKGROUND REPORTS**

Draft Local Plan

December 2017

## **PREVIOUS COMMITTEE REPORTS**

Regeneration and Planning	LLV/183/16	Local Plan consultation	January 2016
Regeneration and Planning	LLV/181/16	Local Plan Consultation – call for sites	January 2016

## **APPENDICES ATTACHED**

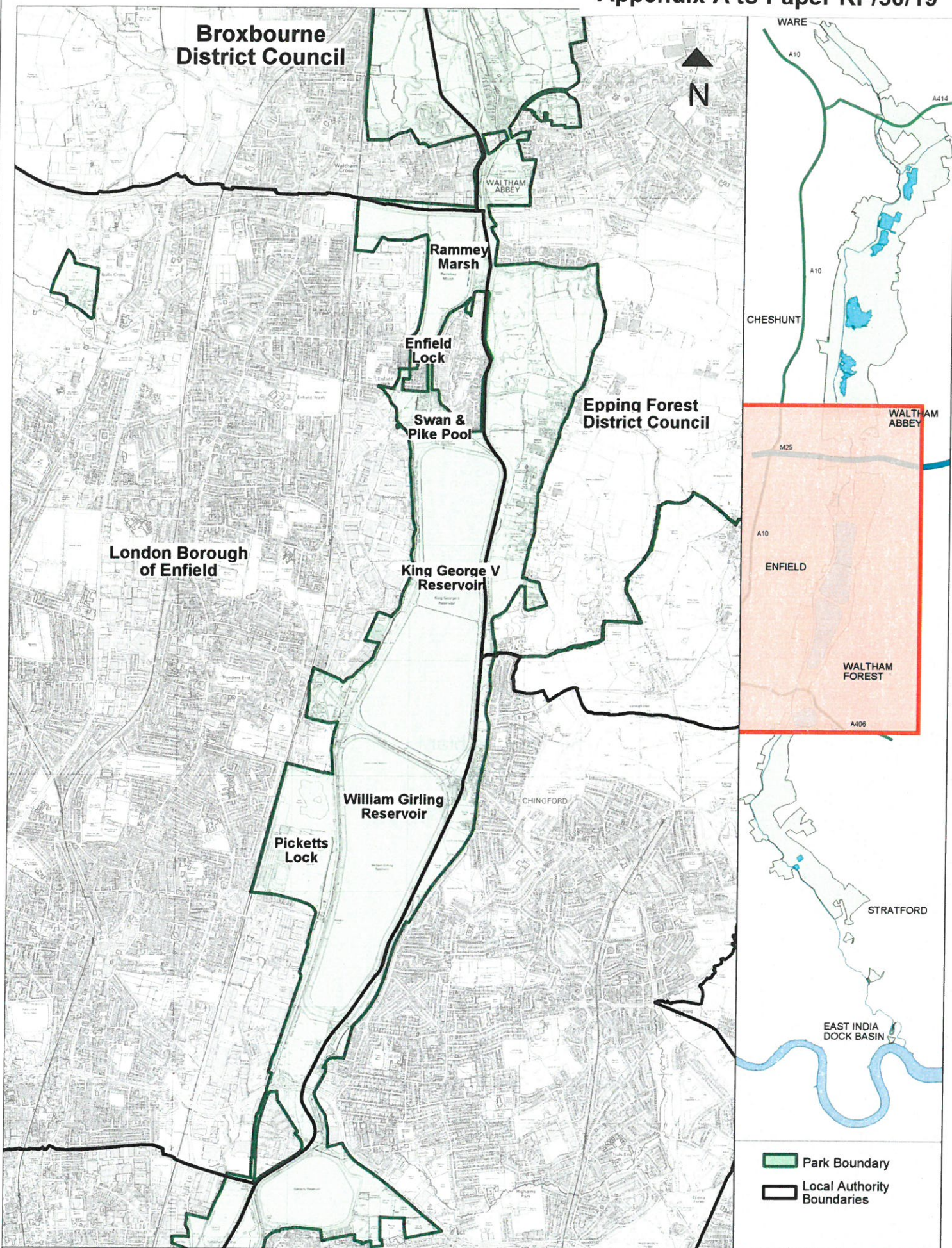
Appendix A	Plan of the London Borough of Enfield administrative boundary and the statutory boundary of the Regional Park
Appendix B	Draft response letter

## **LIST OF ABBREVIATIONS**

SUD	Sustainable Drainage Systems
LVLC	Lee Valley Leisure Centre
SMINCS	Sites of Metropolitan Importance for Nature Conservation
NPPF	National Planning Policy Framework

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Lee Valley Regional Park within London Borough of Enfield





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## Appendix B to Paper RP/30/19

### By Email

May Hope  
Local Planning Manager

Dear Mrs Hope

### Authority's response to the Regulation 18 draft Local Plan Consultation

The Authority's Regeneration and Planning Committee considered your draft Plan at its meeting on 14<sup>th</sup> February 2019. Whilst acknowledging the challenges which the draft Plan seeks to address the Committee had reservations in the following areas.

Of the five 'development options' identified those identified as 'movement corridors', 'regeneration programme' and 'Crossrail 2' each point to investment in the eastern section of the Borough and could lead to new investment in the Regional Park. The development of 'The Wave' at the Lee Valley Leisure Centre, Picketts Lock is consistent with these spatial options in this part of the Borough.

New investment in the eastern corridor either linked to the 'movement corridor' or 'estate regeneration' irrespective of the advent of 'Crossrail 2' could work to the advantage of the Authority as it reviews its land holdings in this area. The item included on Part 2 of this agenda make specific recommendations on certain sites.

Changes to Policy SI3 should reference the importance of the Lee Valley Leisure Complex at Picketts Lock and its role in providing opportunities for active and passive leisure. Inclusion of a commitment to the site's role as a Regional destination and the Authority's work in securing major leisure investment would help. These changes would create the right policy environment to support the Authority's investment plans with 'The Wave'. References would demonstrate the Council's commitment to the regeneration of the eastern and most deprived part of the Borough not just through new housing or employment opportunities but through recreation and leisure to deliver on the Plan's commitment to 'good growth'.

There needs to be additional references to the value of the Regional Park in terms of the Lee Valley Special Protection Area, Ramsar and the several areas of Sites of Metropolitan Importance for Nature Conservation (SMINCS) which are within the Regional Park within the Borough. Inclusion of a specific reference to the development of 'ecological networks/linkages' to connect with strategic areas of green infrastructure, including the Regional Park is required. Reference to the Authority's recently adopted Biodiversity Action Plan would be consistent with policy intent.

Other references need to be included in the draft Plan regarding the Regional Park's unique value in providing for cycling and walking routes and its value in improving connectivity with adjacent Counties and London Boroughs. Specific reference to the Authority's emerging Park Development Framework's, Strategic Policies in either text or an Appendix should be included. This would be consistent with Section 14 2) (a) and (b) of the Lee Valley Regional Park Act 1966.

An additional response will be sent regarding the 'call for sites' which has accompanied your consultation. The Committee requested that a dedicated joint officer meeting should be held to consider these matters.