



1914 - 1918



**Sir William McKee CBE**  
**Chairman**  
**Outer London Commission**

**(Sent via email -**  
**Outer.LondonCommission@london.gov.uk)**

Please reply to : Joanne Woodward  
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Date : 11 September 2015

Dear Sir William,

### **Re. Consultation on Background Issue Papers (June 2015)**

Thank you for providing Enfield Council the opportunity to comment on the background issue papers. It is understood that these papers and subsequent stakeholder consultation responses will inform the Outer London Commission's report to the Mayor that will inform the full review of the London Plan. Officer comments are set out below.

#### **Housing Need in Enfield**

Enfield's population has grown rapidly in the past decade and (presently stands at 324,000 people and 129,000 households making it the fourth most populous borough in London). Projections show that by 2032 the population will rise to over 358,000 and the number of households to 169,000. Reflecting this, the London Plan (March 2015) increases Enfield's target from a minimum of 560 homes per year to a minimum of 798 homes per year - which needs to be added to, to close the gap between supply and identified need. This presents a significant challenge for the borough.

The scale of the challenge means that a range of sources of supply of suitable land will be needed, including the intensification of existing urban areas and potential consideration of land not currently identified for housing growth.

**Ian Davis**  
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### **Business Need in Enfield**

Enfield is also one of London's most important business destinations. Representing the second largest industrial location in the capital, the borough is home to almost 10,000 businesses providing nearly 100,000 jobs. Enfield's employment is expected to grow to 121,000 by 2036. Existing growth sectors include low carbon clean tech energy from waste, logistics, warehouse and distribution and professional, scientific and technical. The relative low cost and availability of commercial floor space and land has helped attract an enviable and diverse industrial base to the borough. Maximising employment opportunities for local residents and Londoners whilst accommodating housing growth will be a key challenge for the future and it will be important to retain jobs and businesses in the borough.

### **Opportunity of Crossrail 2**

The prospect of rail improvements and Enfield's place in the London Stansted Cambridge Corridor will enhance this location further as a key growth area. The enormity and potential of Crossrail 2 could equal transformational change. With 30 trains per hour directly into central London from across Enfield, Crossrail 2 will support regeneration in the same way that the extension of the Tube drove London's expansion in the 1930s, and the Jubilee line spurred regeneration of the Docklands and east London.

For Enfield and north London, the branches to New Southgate and Cheshunt via the Upper Lee Valley, both offer opportunities to support long term housing and employment needs.

A leap in accessibility means higher density development and new planning approaches can be pursued. It also gives the public and private sectors the confidence to invest over time in building lasting communities. Crowding relief on other routes and at London termini will directly benefit residents and also opens up further opportunities along existing lines.

The Council would like to respond to the following question from the Options for Growth background paper.

**G4 In the context of meeting London's growth, what contribution should the following mechanisms make to helping to meet the challenge of delivering increased levels of housing?**

**Increasing outer London densities through suburban renewal (cumulative contribution through infill)**

Outer London contains many good desirable suburbs that contribute positively to the existing character and heritage of place. They provide a benchmark for future placemaking and should be afforded sufficient protection to the threat of densification and eradication of character.

The suburbs are not generally suitable for large-scale restructuring and do not provide an 'easy' solution to meeting housing needs. Over time they could adapt towards more sustainable patterns and make a considerable additional contribution to future needs through densification.

There are also some outer London suburbs that show signs of significant stress with deteriorating community facilities, declining local centres, car domination, and housing that do not reflect population and social change. Some suburbs are becoming less sustainable than when they were first built. There is potential for careful intervention in some suburbs of the borough, working with the local communities, to try to improve facilities and transport patterns, and adapt the housing stock.

As set out in the Enfield Characterisation Study (2011) the north and the west of the borough is characterised by a more suburban context. The Council in taking forward future growth scenarios will need to consider assess the typology and character of these suburbs and a checklist of sustainability criteria could be developed as part of the new London Plan to help understand this picture.

### **Infill Development**

Infill development tends to take place on the less obvious, less visible sites. This raises challenges in terms of design and viability, which often means these potential projects are considered as too difficult. The lack of activity on these sites is becoming an increasingly important missed opportunity for London. This could be potentially avoided with a more holistic approach to deciding whether a development is worth pursuing.

The sensitivities in infill development can make delivering small sites as complicated as large ones. The fine grain of infill means that a site-by-site approach is resource-intensive while making a minimal contribution towards wider housing and regeneration aims.

Recent changes to legislation which allow local authorities to carry out their own direct development and to fund this through their housing revenue account have brought a renewed interest in infill development across London. Enfield is taking advantage of this in exploring the feasibility of taking forward a number of small sites across the borough through the Estate Renewal Programme.

There is also potential in Enfield to focus an infill strategy in key town centres along the A1010 corridor, redundant employment facilities outside of principal designations and renewal and intensification of existing housing estates. Retail parks in the borough may also provide opportunities for innovative ways of accommodating growth.

### **Higher densities in town centres and opportunity/intensification areas with good public transport**

In assessing an intensification approach with town centres and opportunity areas it will be necessary to consider the broader concept of integrating density with the wider environmental, transport and social objectives to ensure a sustainable outcome. The context and character of place is also an important consideration that will need to be integrated into this process as that will add to the distinctive quality and sense of place that some suburban areas and town centres currently lack.

The links between transport and land use planning should be taken as a whole towards creating compact, walkable communities centred around a high quality public transport access which makes it possible to live a higher quality of life without the dependence on a car.

In common with most outer London boroughs, Enfield's town centres are the most accessible locations in the borough and are concentrations of a diverse range of uses and activities including retailing, leisure, cultural activities, housing and community facilities. Many of these activities significantly contribute to the local economy by providing jobs and retaining expenditure within the local area. They have significant potential to promote sustainable intensification/increase in housing densities and it is vital they continue to provide for a range of goods, services and facilities.

Enfield Town, is the borough's largest centre, is classified as a Major Centre within the London Plan (2015) town centre hierarchy along with four District Centres at Southgate, Palmers Green, Edmonton Green, and Angel Edmonton. These are complemented by over 70 local shopping centres and parades providing access to a basic range of small shops and services.

The Council is currently exploring potential options of intensification through detail masterplanning for Enfield Town and Edmonton Green town centres. This includes balancing housing growth with other town centre uses seeking to extend the offer of these centres with growth in the evening economy. Enfield's new Local Plan will also look to explore what other local centres and high street corridors in the borough can contribute to future growth. The challenge will be to balance the need for housing against the primary function of town centres in accommodating retail growth and leisure uses and supporting infrastructure whilst enhancing the townscape character.

**Selective release of London's Greenbelt around public transport nodes for housing (or consolidation of industrial land)**

It is unlikely that a strategy of suburban renewal, infill and town centre intensification alone will meet future housings needs for the borough.

The potential of the West Anglia Mainline Enhancement and Crossrail 2 projects in the context of the North East Enfield corridor offer significant opportunities for transformational land use change that would help deliver the Council's own aspirations to deliver more land for housing whilst retaining economically valuable industrial uses within the borough.

Given the higher frequency of public transport accessibility that the combination of rail enhancement projects will deliver, North East Enfield will become a prime location as part of wider connectivity network in and out of London and the wider Upper Lee Valley and London – Stansted – Cambridge Corridor (LSCC).

The Council would welcome joint working on this with the Greater London Authority (GLA), Transport for London (TfL) and Network Rail to consider the opportunity for growth and impacts of Crossrail 2.

To accommodate future growth outputs of Crossrail 2, the Council strongly believes that any discussion on the future of the green belt for London would benefit from a wider debate with other outer London borough's, facilitated by the Mayor. Any review of the green belt is a strategic cross border issue on which the Duty to Co-operate applies and in order for the green belt to fulfil its purpose and role a consistent methodology should be applied throughout London, the scope of which should not be restricted to transport nodes.

**Densification of built-up areas beyond London**

The National Planning Policy Framework (NPPF) requires that local planning authorities identify their own objectively assessed housing need (OAN), and that the Local Plan translates those needs into land provision targets within the borough. Like all parts of the plan, such housing targets should be informed by robust and proportionate evidence. The Council is also bound by the requirements of the Duty to Co-operate (Para 182, NPPF) in preparing its Local

Plan in consulting with adjoining boroughs as to meeting future need and potential impacts of growth sub-regionally.

So far the Council has recently received a request from one of its adjoining borough's as to accommodating some of their OAN, but expects to receive more, thereby increasing the pressure to find a sustainable solution to the need for new housing.

In summary, it is the view of this Council that further assessment work should be recommended by the Commission in its recommendations to the Mayor to inform the future growth agenda for Outer London:

- **Supporting the Crossrail 2 business case** – to add further weight to TfL's Crossrail 2 business case development work by understanding the scale of opportunity for housing-led, mixed-use and vibrant communities close to the route, and the constraints, challenges and mitigations associated with this. This includes considering how business and local job opportunities could be safeguarded and/or re-provided;
- **Meeting housing demand and ensuring access to jobs through transport** – to assist TfL's business case in demonstrating the contribution that a transport scheme can play in delivering housing in a sustainable and managed way, through appropriate delivery mechanisms, as well as supporting wider economic functions and access to jobs;
- **A test bed for the new London Plan** – the results of any such assessment work will be capable of being applied more broadly as TfL contributes to the work of the London Plan team at the Greater London Authority (GLA). Such work could provide useful evidence for use by the GLA and TfL in the development of a new London Plan, particularly on issues around green belt release, industrial land provision/consolidation and housing densities; and
- **Informing the Enfield Local Plan review** - The work would assist Enfield in its Local Plan review - future growth options development.

I hope these comments are of use and I look forward to continuing the debate on the future of Outer London with you and the Commission. Should you require any further clarification as to the Council's response, please contact with Joanne Woodward, Head of Strategic Planning and Design on the details above.

Yours sincerely,

A handwritten signature in blue ink, appearing to be 'Ian Davis', with a stylized, flowing script.

**Ian Davis**  
**Director – Regeneration and Environment**