

Sadiq Khan
Mayor of London
City Hall

(Sent via email -
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Dear Mayor Khan

**NEW DRAFT LONDON PLAN (2017) CONSULTATION – ENFIELD COUNCIL
TECHNICAL REPRESENTATIONS**

Thank you for providing the opportunity for Enfield Council to respond to the Draft London Plan (2017). The Plan is a very comprehensive document and we share the majority of your ambitions, particularly in relation to meeting the big challenge of addressing housing need and sharing the benefits of growth. I enclose the Council's technical response.

Enfield is developing the Local Plan Growth Vision which we believe will provide a robust and more sustainable basis for plan-led change throughout the Borough. As a London Borough we are equipped to respond positively to challenges of the unprecedented rate of population growth, we will do this by addressing the need for new homes that are affordable; to secure investment in major infrastructure; and deliver a higher wage economy for Enfield residents. The Council is working towards a summer 2018 – Regulation 18 Draft Enfield Local Plan publication consultation which will begin to set out our spatial development approach to future growth.

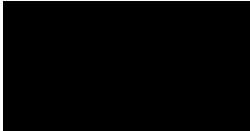
Our Vision cannot be realised without the modification of some of the policies in the Draft London Plan and we hope to convince you of the need to make those modifications working with your officers and as informed through technical evidence preparation leading up to the London Plan examination so that we can work together to deliver your priorities for London.

The Draft London Plan should be reviewed in respect of its cumulative implications for Enfield prior to Examination in Public. There is a clear omission in the current draft and we would look to work with you to address this in both the Draft London Plan and our own local plan making process.

In recognition of the need for full and careful consideration of both the short term and longer term Growth Vision and strategic infrastructure opportunities for both London and Enfield that the Draft London Plan will impact, the Council firmly believes it should have a place at the examination in autumn 2018. We should have the opportunity to engage with and present to the examination panel our technical assessment of the growth opportunities and wider public transport benefits that might arise from strategic infrastructure investment in the Borough.

I look forward to discussing our ambitions with you at the earliest possible occasion.

Regards,



Doug Taylor
Leader of the Council

ENFIELD
Council



**MAYOR OF LONDON
FORMAL CONSULTATION
DRAFT LONDON PLAN (2017)**

Technical representations from Enfield Council

MARCH 2018

MAYOR OF LONDON FORMAL CONSULTATION DRAFT LONDON PLAN (2017) TECHNICAL REPRESENTATIONS FROM ENFIELD COUNCIL

Chapter 1: Planning for Good Growth

KEY HEADLINES:

- 1) *Building strong and inclusive communities requires Enfield being able to provide the homes and employment opportunities for our residents genuinely to prosper and address inequalities. This includes addressing areas dominated by low job and low wage economies and supporting the growth of higher paying employment opportunities for Enfield residents.***
- 2) *Greater emphasis needed on providing a strategic spatial planning strategy for growth aligned with planned new and improved major transport infrastructure.***

- Policy G1 seeks to deliver strong and inclusive communities and the Council is supportive of strengthening healthy communities, increasing active participation and social integration, and addressing social isolation and inequality in particular.
- Policy GG2 looks at creating high density, mixed-use places that make the best use of land. However, the policy should also provide a spatial emphasis on planning for growth aligned to long-term requirements and opportunities for major new and improved infrastructure to ensure that opportunities are optimised.

Chapter 2: Spatial Development Patterns

KEY HEADLINES:

- 1) *The Mayor needs to use the duty to cooperate to seek better cooperation from Wider South East authorities that are key stakeholders in delivering Opportunity Areas and Growth Corridors just beyond their boundaries, in order to help them fulfil their growth potential. For Enfield the incremental growth assertion of outer London boroughs will not necessarily deliver the step change Opportunity Areas and recognised Growth Corridors require.***
- 2) *Needs to be greater flexibility in the types of uses within SIL that is located within Opportunity Areas. Local authorities through their local plans are better placed to specify employment sectors and types best suited to securing regeneration within these areas including setting a framework for co-location. This would include identifying uses compatible with bringing forward new homes.***

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- Policy SD1 focuses on ensuring that Opportunity Areas fully realise their growth and regeneration potential. Enfield is part of two identified Opportunity Areas, The Lee Valley and New Southgate Opportunity Areas. There needs to be greater recognition of the importance of neighbouring authorities (outside of the M25) in assisting the delivery of London Opportunity Areas. Furthermore, there needs to be greater flexibility in the types of uses within SIL that are located within Opportunity Areas, with Local Plans being able to specify the sectors and employment types best suited to securing regeneration within these areas.
- Policy SD2 looks at collaboration in the Wider South East. It needs to state that the Mayor will actively work with and build direct working relationships with authorities in the Wider South East so that Opportunity Areas and Growth Corridors are delivered successfully. The Mayor needs to ensure that neighbouring authorities are fully supportive of strategic proposals to encourage growth.
- Policy SD3 focuses on growth locations in the Wider South East and beyond. The Mayor needs to be more proactive in supporting WSE partners by actively working with them and helping them deliver their growth potential. This will help with the delivery of growth associated with proposed large scale infrastructure improvements.
- Policy SD6 aims to promote and enhance London's varied town centres and their vitality and viability. There should be mention of using green and digital infrastructure to enhance the safety and security of town centres. Greater commitment should be given to a renaissance of all London town centres and high streets and their changing functions including the role they play in delivering new homes.

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Chapter 3: Design

KEY HEADLINES:

- 1) Developers may be able to use the Plan to easily justify single aspect dwellings, provide insufficient daylight and sunlight and provide less than acceptable outdoor amenity standards for housing.***
- 2) Boroughs do not have the resource to establish the most appropriate form of development for all potential development sites through their Local Plan.***
- 3) Concern about the removal of the density matrix as it gave some easy to follow guidelines around the direct relationship between public transport connectivity and suitable density.***

- Policy D1 looks at London's form and characteristics. There is a marked focus on the circular economy in the supporting text but this is not reflected in the policy. Whilst there should be reference to the circular economy in the policy, further detail should be provided in Policy SI7 "Reducing waste and supporting the circular economy" rather than in the supporting text for D1.
- Policy D2 focuses on delivering good design. With regard to section B 'Determining capacity for growth', there is no clarity with regard to the definition of 'area' and the timing of establishing the most appropriate form of development. Also, boroughs will not have the resource to establish the most appropriate form of development for all potential development sites through their Local Plans. It should be the assumption that this be applied only when individual sites are being brought forward for development, either by the council through a site allocation, or by a developer. There also needs to be more clarification on the role of the GLA Design Advocates.
- Policy D3 looks at delivering an inclusive environment through design. The proposal to have an inclusive design statement is supported but further guidance on the scope for this would be useful in order to ensure consistency and aid compliance.
- Policy D4 needs to be clearer on the circumstances under which single aspect dwellings might be accepted. Developers may try to use policy D1 to justify single aspect dwellings as this policy is so broad. Any proposal for single aspect dwellings needs to be strongly justified. Furthermore, the policy needs to be more helpful in defining what sufficient daylight and sunlight standards are. Whilst the minimum outdoor amenity standards for

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housing are supported, it is important to note that in some cases development may require higher standards. Finally, the policy needs to recognise that larger dwellings contribute significantly to the character of place.

- Policy D6 looks at optimising housing densities. Whilst the focus on optimising housing potential is welcomed, more detail is required on the relevant context of this Policy. The Draft Plan needs to recognise that local plan making is best placed to respond to the individual character of town centres across London and set appropriate policies for where higher densities would be acceptable. There needs to also be a more sophisticated approach to public transport access, as issues such as transport system capacity and the time taken to get to a destination should be factored into the policy. Finally, there is concern about the removal of the density matrix as it gave some easy to follow guidelines around the direct relationship between public transport connectivity and a range of suitable densities allowing the local planning authority to take more detailed account of local character and context. density.
- Policy D8 looks at tall buildings. There is concern that identifying areas where tall buildings are appropriate may be interpreted as a permission in principle by developers. Due to the complex issues that affect the appropriate placement of tall buildings, there will inevitably be many unsuitable sites within any broadly suitable area. Boroughs do not have the resource to carry out a detailed analysis for every potential site and therefore the importance of site-specific context should have more emphasis. Boroughs should continue to identify places that are sensitive to tall buildings through their development plan documents. However tall buildings are likely to be acceptable in areas of transformational growth providing appropriate standards are applied and local plan criteria met
- Policy D9 looks at basement development. The issue with this policy is that it needs to focus on issues more specifically related to basement developments rather than issues that would be assessed as part of any development.

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Chapter 4: Housing

KEY HEADLINES:

- 1) Large areas of Enfield have PTAL levels lower than 3. The Draft London Plan should clarify its position on optimizing housing delivery, this should not be restricted to levels 3-6 but in all areas of the built up area as appropriately identified through Local Plans.***
- 2) Whilst supporting the Mayor's ambition to address the housing crisis in London we remain concerned that the draft plan fails to provide the level of flexibility to allow Enfield to help the Mayor meet London's housing need. Innovative approaches to policy would be welcomed as opposed to an over dependence on small sites coming forward and generic presumption in favour of high densities that would promote inappropriate development. 3) Affordable housing policy goes against evidence which states that 65% of London's delivery should be affordable. There should be an early review of H5 in the event that more grant funding can be levered into delivery of affordable housing to meet the SHMAA assessed need.***
- 4 We have serious reservations over the lack of collaboration on the methodology behind the proposal for a 'small sites top-up' and therefore the soundness of this policy assumption in meeting housing need which fails to reflect the track record of evidenced delivery.***

- Policy H1 we support the focus on increasing housing supply, however we have serious reservations about how the housing target for London has been calculated. Policy H1 states that boroughs should optimise housing delivery on sites with existing or planned public transport access levels (PTALs) 3-6 or which are located within 800m of a Tube station, rail station or town centre boundary. This is an issue for Enfield and outer London boroughs, given the reduced accessibility to public transport in such boroughs. Some parts of the borough score 0-2 PTAL, which includes areas of industrial land. This is not the case for inner London boroughs. There is further tension due to the new Permission in Principle (PiP) requirements, where PiP will be granted for proposals of 1-10 units where the site is under 0.1 ha. Due to the small sites rules, the Council cannot secure contributions towards public transport upgrades. Tension also lies between the

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push towards optimising density and proposals which involve reducing the overall number of homes to deliver a better housing mix as well as tension focusing on “density” & 1 and 2 bed units in London Plan and what is locally evidenced.

- Policy H4 looks at ‘Meanwhile Uses’. There is no detail on the types of meanwhile uses that may be suitable. More can be made of the positives of precision-manufactured technologies and pre-fabricated construction. Growth in this sector should be encouraged further. However, it is not immediately apparent what advantage there is in erecting temporary homes on sites already earmarked for residential developments.
- Policy H5 looks at ‘Affordable Housing’. The policy to increase the supply of affordable housing is to be supported but viability will continue to remain the biggest challenge between bridging the gap between meeting evidenced need on the SHMA of 65% and supply. It is difficult to see how the Mayor has reconciled this. The policy should be subject to early review in the event that more grant funding is available. There is also no justification for Affordable Housing delivery being measured in habitable rooms rather than units.
- Policy H13 ‘Build to Rent’ should draw out the distinct roles of planning policy matters and operational housing matters. The policy guidance should go further to enable Build to Rent developers to compete with market sale developers when acquiring land.
- Policies H14 and H15 focus on ‘Shared and Supported Housing’. Given the urgent need for housing, there may be an argument for the move to C3 for sheltered housing and extra care proposals. It should be noted that CIL charges will add to the cost of getting planning consents as they are also liable for S106. This is particularly risky since the proportion of over 75s will double in Enfield by 2035.
- Policy H16 focuses on ‘Gypsies and Travellers’ and should refer to ‘Travelling Showpeople’. Also, Mayoral Development Corporations should also identify sites for Gypsy and Traveller pitch need.

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Chapter 5: Social Infrastructure

KEY HEADLINES:

- 1) *With regard to healthcare, there is a need to plan for more than 5 years.***
- 2) *Local Plans should identify sites to satisfy school places demand.***
- 3) *It provides limited guidance on the provision of play space as a result of development and does little to address non – residential play provision.***
- 4) *Affordability of sports and recreation facilities need to be factored in demand assessments.***
- 5) *Promotion of use of ACVs is welcomed however, local authorities will continue to undertake a process of assessment and apply appropriate weight on a case by case basis.***
- 6) *It is also worth noting the definition of social infrastructure for the purposes of the London Plan has changed considerably with a clear omission of Public Houses and we would recommend the draft plan revisit this.***

- Policy S2 looks at ‘Health and social care facilities’. It fails to take into account the need to plan for longer than the NHS Five Year Forward View. There is also no mention of the requirements for Health Impact Assessments (HIAs) or the Mayor’s SPG on social infrastructure. Further to this, the Plan needs to set out how the GLA are working with Sustainability and Transformation Plans (STPs) to identify healthcare need over the Plan period. There also needs to be clarity with regard to the commitments of the London Estates Board. Finally, the policy needs to make reference to the shortage of healthcare professionals due to London’s living unaffordability, with measures proposed to improve this situation.
- Policy S3 ‘Education and Childcare Facilities’ fails to realise the role of the ESFA. There is no mention that ‘Free Schools’ fall outside local authority control. Local Plans should identify sites to satisfy school places demand. There needs to be some sort of ‘London School Design Guidance’ that is specific to London in order to address issues such as air pollution. The policy does not reference parking standards and the need for pick up and drop off facilities, or build upon the healthy streets concept, or reference any standard for design and the provision of outdoor space. When housing results in the loss

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of previous educational land, S106 contributions should be sought from the resulting loss of school places.

- Policy S4 focuses on 'Play and Informal Recreation'. It provides limited guidance on the provision of play space as a result of development and does little to address non – residential play provision. The text should identify the difference between residential development led play provision and other play provision, with the mayor providing some funding for non-residential play provision. It also does not set out quality or safety standards and does not differentiate between the separation of formal play for older and younger children.
- Policy S5 looks at 'Sports and recreation facilities'. Demand assessments should only take into account the affordability of sports and recreational facilities. The Plan fails to specify what standards new pitches should aim to achieve and what types of artificial grass pitches should be favoured. There isn't enough information on sports lighting and the impact of these or those instances where sports pitches are accompanied by spectator areas. There is also little information on sports clubs wishing to expand their stadiums or look for sites elsewhere. This is important as it adds to London's cultural offer.
- Policy S6 focuses on 'Public Toilets'. It needs to reference the British Standards for the provision of toilets and to provide clearer guidance on how the Plan will work with local community toilet schemes. There is no reference to delivery mechanisms, it lacks a spatial element and does not relate to types of spaces. It fails to recognise that there may be sufficient supply of public toilets nearby, fails to define what is meant by 'large scale' development and fails to specify quantum's and sizes of the types of toilets required.

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Chapter 6: Economy

KEY HEADLINES:

- 1) *The ability to deliver an additional 50ha of new SIL land, and potential compensation SIL and be able deliver the draft housing target numbers is strongly questioned.***
- 2) *New office clusters should be promoted in Opportunity Areas.***
- 3) *Affordable workspace needs a proper definition and a policy similar to affordable housing policy.***
- 3) *The Plan is too rigid and fails to recognise that SIL is not the same across London. There needs to be a level of flexibility involved in SIL policy, especially in areas earmarked for large scale regeneration.***
- 5) *SIL policy needs to be more dynamic and allow opportunities for Enfield to drive higher-wage employment in mixed use developments that would support the Crossrail 2 business case rather than undermine that business case as it currently does***
- 6) *Boroughs should be fully in charge of their retail provision.***

- Policy E1 looks at office provision. There should be greater emphasis on supporting office growth/clusters within Opportunity Areas or growth corridors where there will be large scale strategic transport infrastructure improvements, supported by Article 4 directions. The draft plan should consider office provision as an acceptable replacement for SIL land where Boroughs suffer from a low-wage economy
- Policy E2 'Low-cost business space' is too simplistic by providing a blanket 2,500 sq.m B1 business floorspace threshold for flexible workspaces for SMEs. It should be locally set.
- Policy E3 focuses on 'Affordable workspace' but it fails to provide an adequate definition for affordable workspace. The policy should specifically define a market percentage for this, with a strategic target similar to affordable housing policy.
- Policy E4 'Land for industry, logistics and services to support London's economic function' needs to promote flexibility for SIL within Opportunity Areas. SIL reconfiguration within these areas needs to take into account co-location of uses, if the mayor wants to support the Crossrail 2 business case.

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- Policy E5 ‘Strategic Industrial Locations’ is too rigid and fails to recognise that SIL is not the same across London. There needs to be a level of flexibility involved in the policy, especially in areas earmarked for large scale regeneration. SIL policy should also give room for local authorities to set a vision for the types of industry that they want to attract. Intensification does not imply that uses will be compatible. Policy should allow for the better co-location of uses within Opportunity Area SIL similar to LSIS policy. The agent of change principles will protect industrial uses from incompatible uses coming in.
- Policy E7 ‘Intensification, co-location and substitution of land for industry, logistics and services to support London’ is contradictory and simplistic. As mentioned before, it only supports intensification of industrial uses within SIL. If the GLA wishes to see good growth in the ULV corridor, then SIL policy will have to be relaxed and it must allow for co-location of mixed land uses. A policy similar to LSIS policy should be written.
- Policy E9 ‘Retail markets and hot food takeaways’ is too controlling. Comparison and convenience goods retailing capacity should be brought forward to town centres through Local Plans in line with local evidence. Boroughs should be in charge of their retail provision. Policy is too simplistic regarding the provision of small shops and affordable units, this should be locally defined.
- Policy E10 ‘Visitor Infrastructure’ needs to clarify what the definition of ‘well connected’ is with regard to visitor infrastructure provision.

Chapter 7: Heritage and Culture

KEY HEADLINES:

- 1) Plan needs stronger recognition of the need to avoid and minimise harm for all heritage assets.***
- 2) It needs to reference that culture can address existing inequalities.***

- Policy HC1 ‘Heritage conservation and growth’ needs stronger recognition of the need to avoid and minimise harm for all heritage assets as they are a finite resource. The supporting text could do more in referencing the value of locally-led and small scale heritage projects and the examples given could encourage the use of heritage ‘totems’ or evocation of form rather than conservation and re-use. The list of what can represent heritage significance makes no mention of how patterns of use characterise certain

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areas and more consideration should be given to unsympathetic change and how this should be assessed and what weight it should be given. It also needs to need be more firm on protecting the setting of heritage assets and the need to avoid harm.

- Policies HC3 'Strategic and Local Views' and HC4 'London View Management Framework' need to make clear that some Outer London views stretch beyond the extent of London boroughs into neighbouring districts, and that measures to protect views should be considered as part of the duty to cooperate.
- Policy HC5 looks at the 'Culture and Creative Industries'. It needs to reference that culture is an opportunity to address inequalities. However, the policy needs to distinguish the difference between Cultural Quarters and Creative Enterprise Zones. There is a need to set out how authorities are to determine demand for creative industries.
- Policy HC6 focuses on the 'Night Time Economy'. It fails to recognise that Enfield aspires to have a night-time economy and wants to be on the network. Green and digital infrastructure should be used to promote safety in town centres with the mayor being more proactive in supporting boroughs where there are strong restrictions on the night time economy. Night time economy should be promoted within opportunity areas.

Chapter 8: Green Infrastructure

KEY HEADLINES:

- 1) Green Belt policy needs to set out a vision/aspiration for its use or purpose. It can be used more productively than it is currently.***
- 2) Natural Capital Accounting needs to be referenced.***
- 3) Value of trees needs to be referenced.***
- 4) Biodiversity policy needs to do more than to just protect SINC's. It needs to protect wildlife/green corridors.***
- 5) Boroughs should set their own Urban Green Factor scores. UGF should be used more widely.***
- 6) Greater recognition to outer London borough in providing many of the high quality green and open space assets for all Londoners to enjoy.***

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- Policy G1 'Green infrastructure' does not categorically define what constitutes green infrastructure. The GLA need to provide further guidance on Local Plan approaches to green infrastructure. The GLA references using Natural Capital Accounting in its environmental strategy but there is no reference to it in the policy. There is no mention of non-native invasive and invasive species.
- Policy G2 'London's Green Belt' needs to set out a vision/aspiration for its use or purpose. The Green Belt provides many opportunities to benefit Londoners; it can be used as a resource for local food production. The policy needs to recognise that it may be inappropriate to increase access to some parts of the Green Belt. There also needs to be some clarity on 'Openness and permanence' as a characteristic of the green belt. For example, does this mean that woodland creation will be discouraged?
- Policy G3 looks at 'Metropolitan Open Land'. It should state that the principles of national Green Belt policy also apply to MOL and that flood storage should be added as a criteria. It should also state land swaps involving MOL would only be appropriate where the result would not lead to a deficiency in access to public open space.
- Policy G4 focuses on 'Local green and open space'. A clear definition of what constitutes local green and open space is needed. It also needs to mention green infrastructure on the highway. However green infrastructure guidance is required in order to make informed representations regarding local green and open space.
- Policy G5 looks at Urban Greening. It is unclear how the mayor has arrived at the Urban Green Factor (UGF) target scores. This makes it difficult for local authorities to understand how to go about setting a more appropriate UGF. UGF should be used more widely.
- Policy G6 'Biodiversity and access to nature' needs to provide further guidance regarding triggers for when an ecological survey is required as part of planning applications. It does little to set of designations off wildlife/green corridors, with proposals to protect them. Further to this, it does not reference the Environment Strategy which states that a biodiversity offsetting metric will be explored. The policy doesn't do much more than protecting SINC's alone.
- Policy G7 looks at Trees and Woodlands. It needs to reference protected trees and trees in conservation areas whilst also failing to specify a minimum target for tree cover in areas undergoing comprehensive redevelopment. It also doesn't offer any direction regarding woodland management and how material from tree felling can be used

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productively. I-tree and CAVAT are a means of calculating the benefits of trees but they do not take into account the wider value of trees with the policy also needing to protect trees of value and not just of quality. The policy fails to mention orchards as a means of food production, doesn't discuss community tree planting or that trees can increase land values. There needs to be a commitment from the mayor to support local tree nurseries where seedlings can be cultivated. There also needs to be a strategy that will deliver the Mayor's aspiration to increase tree cover by 10%.

- Policy G8 focuses on 'Food growing' and does not offer flexibility on allotment protection and provision. Some allotment sites can be used to provide affordable housing with sites being re-provided in the Green Belt.

Chapter 9: Sustainable Infrastructure

KEY HEADLINES:

- 1) More practical detailed measures on how air quality can be improved and how greenhouse gas emissions can be reduced would be useful, especially due to the shortage of BREEAM assessors.***
- 2) The 95% recycling target for 2020 is overambitious.***
- 3) Digital Infrastructure Connectivity needs to be prioritised in growth areas.***
- 4) The waste policy prejudices Enfield as it states that it is the only borough in the NLWP area with locations available for potential waste sites. Because of the limited number of sites in inner London, inner London authorities should retain and intensify sites and seek to maximise their share of windfall sites. The Mayor should also take the opportunity to address fundamental delivery implications for waste including cross-subsidy and charging levy to secure waste management for London.***
- 5) The Draft Plan needs to proactively address the issue of London's water shortage in anticipation of growth the forthcoming National Infrastructure Report.***

- Policy SI1 looks at 'Improving Air Quality'. More practical details on how this could be achieved are needed, especially where relevant to smaller scale developments. Green

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infrastructure should be encouraged as a buffer in the Highway. The Air Quality Focus Areas map is useful in showing hotspots for poor air quality levels and high exposure but more is needed on what actions authorities should take in these areas.

- Policy SI2 focuses on 'Minimising greenhouse gas emissions'. The policy needs to realise the BREEAM has a shortage of qualified assessors and may not be appropriate for smaller developments and so more detailed suggestions of relevant measures could be useful. There should also be a reference to the Home Quality Mark, with more planning guidance on sustainable design and construction.
- Policy SI3 'Energy Infrastructure' should place more weight on natural attenuation and trees as a solution to sustainable drainage.
- Policy SI4 'Managing heat risk' doesn't refer to the building regulations. Reference to a BRE standard (or similar) would be beneficial and planning departments would then be in a position to request certification to demonstrate that requirements had been met.
- Policy SI5 looks at 'Water Infrastructure' but it needs to include a commitment from the mayor that the GLA will work with water supply and sewage companies in supporting anticipated growth. Measures such as smart metering, water saving and recycling measures have to be incorporated. SUDs should be applied to all development and not just in areas of flood risk as all areas are part of a catchment.
- Policy SI6 looks at 'Digital connectivity infrastructure' and needs to prioritise incorporating high quality digital connectivity into growth areas.
- Policy SI7 'Reducing waste and supporting the circular economy' has an overambitious 95% recycling target by 2020.
- Policy SI8 'Waste capacity and net waste self-sufficiency' should state how waste will be reduced. It is also unclear whether this is a matter for local plans or joint plans. It lacks a mention of regeneration aspirations and the need to redress existing concentrations of deprivation in areas which have historically hosted a high concentration of waste facilities. High concentrations can have huge negative impacts on areas. There needs to be clarification of what a 'flexible approach' means in practice. Because of the limited number of sites in inner London, inner London authorities should retain and intensify sites and seek to maximise their share of windfall sites. The waste map needs to be rectified as it does not correspond with the NLWP and it prejudices Enfield.
- Policy SI9 'Safeguarded waste sites' needs to define these as 'land with planning permission for a waste use and a permit from the Environment Agency for waste use'.

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- Policy SI10 'Aggregates' has an overambitious 95% recycling target by 2020. It would be useful if the policy was more specific in defining what is expected of local authorities regarding potential areas of extraction.
- Policy SI12 'Flood risk management' does not provide detail on how much a development should be set back from the edge of a watercourse. There needs to be commitment from the mayor to update the Regional Flood Risk Appraisal following any major flood events in London. There also needs to be more regarding the relationship between local authority Strategic Flood Risk Assessments and the Mayor's Regional Flood Risk Appraisal.
- Policy SI13 'Sustainable Drainage' needs to provide further detail and clarity in the use of the drainage hierarchy approach as it will lead to unintended outcomes. The wording for the hierarchy also needs to be changed. The policy also needs to define 'greenfield' runoff rates as runoff from undeveloped sites as it would have been in its natural state. The policy should state that SuDS source control measures should be used as part of a SuDS management train. Source control measures include features such as green roofs, rain gardens and permeable paving – this approach, along with the requirement to intercept the first 5mm of rainfall, will ensure that both water quality and water quantity benefits are achieved. There should be a requirement that all developments are able to capture the first 5mm of rainfall events. Further to this, it should state that direct discharge to a watercourse without any treatment via a source control SuDS measure will not be permitted. Finally, it would be useful to include information on the 5m proximity to building rule, especially in reference to permeable paving near buildings. It should reference that Local Plans should identify areas within their boundaries where infiltration measures could be located much closer to buildings.
- Policy SI16 'Waterways – use and enjoyment' needs to go into more detail regarding how local authorities are to go about identifying deficits in the provision of water sports centres. It should also set out minimum requirements for the provision of new mooring facilities, including those for electricity hook-up, bathroom and shower facilities, laundry facilities and facilities for waste disposal including those for human waste. The mayor could go further in improving waterside development by ensuring that planning applications take into account 'Waterside Development Strategies', which should also state that major developments adjacent to waterways should realise opportunities to improve rivers. Mooring should be recognised as part of the housing offer.

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- Policy SI17 'Protecting London's waterways' needs to refer to future guidance regarding waterside related development. Planners need to know how and where development could negatively impact waterways. The mayor should clarify how planners should determine whether development proposals alongside the canal network and other water spaces respect local character and environment and contribute to their accessibility and active water-related uses in line with new guidance.

Chapter 10: Transport

KEY HEADLINES:

- 1) Concern over the uncertainty of Crossrail 2 and Four Tracking of the West Anglia Mainline.***
- 2) There should be recognition that transport enhancements, strategic road and rail in the ULV Opportunity Area will improve connectivity to Stansted Airport, opening up significant opportunities to accommodate more homes and jobs.***
- 3) There needs to be further investment in improving the sustainable transport network in outer London, especially to improve east-west links.***
- 4) Target for 80% of all trips to be made by sustainable modes by 2041 will be challenging for outer London boroughs. Specific targets and delivery milestones for each borough are needed.***

- Policy T1 'Strategic Approach' sets a target of 80% of all trips to be made by sustainable modes by 2041. This will be challenging for outer London boroughs given their current transport constraints. Specific targets and delivery milestones need to be applied for each borough. The mayor needs to actively commit and support each borough in order to facilitate the discouragement of car use and encourage modal shift to more sustainable forms of transport. There should not be punitive approaches to delivering this.
- Policy T2 'Healthy Streets' can be questioned as it may not be practical to use a planning system to implement it by mandating that development proposals must demonstrate how they comply with the approach. It will put further strain on existing Council services and scheme viability in outer London boroughs. The mayor should outline how these issues should be addressed.

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- Policy T3 focuses on 'Transport Capacity, Connectivity and Safeguarding'. Greater specificity would be welcome on improvements to the London Overground service to Enfield Town and also to some of the infrastructure projects outlined in the Plan.
- Policy T4 looks at 'Assessing and Mitigating Transport Impacts'. The current approach to development related travel plans is flawed so the focus should be on developers providing suitable mitigations to address transport issues and monitoring via TRICS compliant surveys. TPs should not be part of the process and instead should be mitigation offered to the new users of a development because they will have a vested interest in delivering improvements. The use of Grampian type conditions to phase development in line with transport infrastructure investment should be explored by the GLA but this requires full commitment from the Mayor. The Plan states that Transport Assessments should be submitted with development proposals but given it is not feasible for this to be applied to all scales of development, there needs to be clarification in the Draft Plan as to the thresholds for this requirement.
- Policy T5 'Cycling' has differing parking standards for inner and outer London. Lower levels of cycle parking for outer London is directly contrary to the Mayor's sustainable travel objectives. There is the need for a mechanism for passive provision in development where there are too many cycle parking spaces. There needs to be better monitoring of the delivery of cycle parking.
- Policy T6 'Car Parking' raises the query about the use of PTAL as a measure as it doesn't represent cycling and walking. There is a lack of specificity regarding hotel and leisure uses parking. The maximum parking standards are a blunt tool for Enfield as they do not relate to actual levels of car ownership and so could lead to additional parking provision.
- Policy 76.1 'Residential Parking' needs to be clear that lowering levels of onsite parking where there is no mechanism to constrain demand, will not reduce demand for private cars. There needs to be investment in improving the sustainable transport network in outer London.
- Policy T6.2 'Office Parking' is not progressive as the Plan states maximum parking standards, given the focus on reducing residential car parking.
- Policy T6.3 'Retail Parking' does not take into account that retail trips are car dominant and that parking is important. Thus, there needs to be policy promoting electric parking,

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charging points and secure cycle parking should be encouraged in town centres and near retail development.

- Policy T7 'Freight and Servicing' needs to indicate how developers and boroughs should resource the development and monitoring of Construction, Logistics and Delivery and Servicing Plans. A light touch online system should be favoured.
- Policy T8 'Aviation' should explicitly recognise that transport enhancements in the ULV Opportunity Area will improve connectivity to Stansted Airport; opening up significant opportunities to accommodate more homes and jobs.
- Policy T9 focuses on 'Funding Transport and Infrastructure through Planning'. There is concern over the uncertainty of Crossrail 2.

Chapter 11: Funding the London Plan

KEY HEADLINES:

- 1) Viability assessments should only be submitted in exceptional circumstances.***
- 2) Planning Obligations breadth should be widened.***

- Policy DF1 could be tightened to ensure that viability assessments are only submitted where there are clear "exceptional" circumstances. The breadth of planning obligations should also be widened to include heritage, green and sustainable infrastructure.

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