



Space to Build, Enfield

January 2019

Enfield RoadWatch, The Enfield Society and CPRE London have conducted a detailed survey of the entire Borough of Enfield, ward by ward, to establish a list of sites which could provide space to build. These are sites which currently make poor use of space and which could be intensified and put to better use. These range from some very large sites to hundreds of ‘micro’ sites.

- A document has been created for each of the 21 wards in Enfield which lists and provides images of each and every site.
- The sites are also all listed in a spreadsheet.

This report accompanies those documents but also discusses which of the sites would be appropriate for development in the timeframe of the Local Plan.

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A. Introduction

A response to Enfield's Draft Local Plan Consultation

CPRE London, The Enfield Society and Enfield RoadWatch share the belief that London's Green Belt remains a vital and relevant part of London's planning policy.

All three organisations were concerned to see that Enfield's Draft Local Plan Consultation suggests that Green Belt in Enfield might need to be reviewed to find space to build and even went as far as saying that the Crews Hill might be an area to look at for development. This is a major concern for us because:

- development of housing at Crews Hill, expanding this settlement, will fail to preserve the openness of the Green Belt
- among other important functions, Enfield's Green Belt helps prevent low-density, car-dependent development which does not make good use of land. And it promotes regeneration and densification in areas where good public transport can avoid the need for car trips
- CPRE evidence has shown that Green Belt developments deliver expensive housing which cannot meet the need for affordable housing in Enfield
- development in Enfield's Green Belt is unnecessary: there are enough low-density, previously-developed sites across the Borough to deliver much needed new housing, even while expanding commercial/industrial space
- Crews Hill is a popular destination and an appropriate plan for the area would be to support the existing nursery businesses and enhance the area for people to enjoy as per Para 141 of the National Planning Policy Framework.¹

Large areas of Enfield require regeneration: these areas provide a clear alternative and should be considered for development. We have surveyed the whole of Enfield, ward by ward, street by street, so that we can present clear evidence to underpin this statement.

This report puts forward recommendations and proposals for the next version of the Local Plan, drawing from the evidence gathered.

B. Enfield should not, and does not need to, seek to release Green Belt as part of its Local Plan development process

A huge opportunity for Enfield residents

Enfield is a wonderful place to live with acres of parks and green spaces, great transport links and opportunities for even better public transport. It can readily attract business and new residents with carefully-planned development, that will also provide an opportunity to address the lower standard of living east of the A10 caused by decades of industrial decline. We support the need to create space for new homes, businesses and amenities in Enfield and believe carefully-planned new development can also improve the lives for existing

¹ Once Green Belts have been defined, local planning authorities should plan positively to enhance their beneficial use, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land.

residents in the borough immensely by bringing economic growth along with an improved environment, in particular reducing traffic congestion and air pollution.

We support ambitious housing targets and have conducted detailed research which demonstrates there is space to build at least 37,000 homes on previously developed land (PDL) in Enfield, without the need to build on Green Belt.

On the whole we have made conservative assumptions about density except for the area served by Southbury Station, all of which we believe should be an Opportunity Area, which could be built to high density, within agreed height limits. Also we have not by any means included all developable sites. The total could be higher if different assumptions were made about density and/or more sites included.

But housing targets need to be realistic

However, the current build rate, which is around 500 to 600 dwellings per year, is a great deal lower than the proposed build rate of 3,500 per year (total 52,500) which is quoted in the consultation as coming from the 2018 NPPF government figures and is based on a formula which has been under consultation. We believe targets should be realistic and that the figure of 3,500 per year is unrealistically high.

The key problem with setting unrealistic targets is that it drives ‘over-allocation’ of land which cannot then be usefully deployed for other purposes.

A target of 36,000 over a 15 year period (2,400 per year), which we understand was put forward by the Local Plan Sub-Committee, would be more realistic while still being extremely ambitious. Note that the London Mayor’s target for Enfield is lower at 28,140.

Housing targets

Housing targets must be set at a realistic level taking into account market conditions and the current build rate. A figure of 2,400 per year is ambitious but more realistic than 3,500 per year and so 2,400 per year (total 36,000) is the maximum target which should be adopted. A genuinely realistic target would be nearer to 1,500 to 2000 per year.

Transport improvements must be brought forward to support these targets, in particular rail improvements on the West Anglia main line and improvements to bus provision in the Upper Lee Valley corridor. Relevant bus proposals from page 67 of Lee Valley Transport Study Proposals are set out at Annex 6.

An ambitious vision for Enfield can be achieved without building on Green Belt

There is no need to review Green Belt in Enfield: there is enough Previously Developed Land (PDL) to accommodate needs - specifically we have identified

- space to build at least 37,000 homes on space which is currently inefficiently used
- additional space which could be intensified for commercial / industrial use.

Green Belt in Enfield continues to meet the five Green Belt purposes as set out in the NPPF. A Green Belt Review conducted by the council in 2013 established this and nothing has changed in the intervening period to question that position. Green Belt should never be considered for development ahead of PDL sites: there are many PDL sites in Enfield which

could be built out within a 5 to 10 year time-frame. No new Green Belt review should be conducted - and it is not needed.

Building on Enfield's Green Belt would cause a great deal of harm. It would:

- fail to preserve the openness and permanence of the Green Belt, harming its integrity and amenity value for current and future generations
- encourage low-density, car-dependent development which would add to congestion, noise and air pollution in a Borough which needs to reduce car trips
- be ineffective in addressing Enfield's housing needs which could be better tackled by developing large strategic sites with good public transport links
- entail the loss of good quality agricultural land which could and should in fact be put back to use to create a sustainable local food source for Enfield markets as per the GLA's *Farming in London's Green Belt* report of Dec 2018
- also entail the loss of amenity space for Enfield and London residents, the potential of which is great and enhancements can and should be planned.

Green Belt

Proposals to review Green Belt should be abandoned. No Green Belt review needs to go ahead. More appropriate and sustainable alternative sites are available. The council should plan positively to create masterplans for the extensive, available alternatives to develop previously developed land in Enfield. No Green Belt sites should be considered for development.

A positive vision for Crews Hill should be created – as a centre for horticulture, which recognises the major potential for employment and the major opportunity for Enfield's economy – see Annex 7 for more

The draft Local Plan should pay closer attention to the value of agriculture and horticulture in the borough and reference Enfield's long-standing and valuable farming industry. Growing food locally has become even more critical in light of environmental, economic and other challenges.

Rather than displacing a number of viable Crews Hill businesses, the Local Plan should create a positive plan to support the retail garden centres and develop the area to provide London with vegetables, plants and flowers so that it is again a hub for food production.

There are sound economic reasons for retaining horticulture in Enfield.

- UK households spent around £7.5 billion on garden goods in 2017, equivalent to £1 in every £100 of household spending.
- The retail sale of ornamental horticulture goods directly added around £1.9 billion to UK GDP in 2017. Over half was accounted for by garden centres. The Southeast has the largest market, accounting for nearly 20% of total spending on ornamental horticulture.
- In 2017, garden centres supported 84,800 jobs, 2.9% of the UK's retail workforce.
- Crews Hill is already highly valued by locals and visitors from a wide catchment well beyond Enfield, for whom it is a much-loved destination: re-creating this economic value would be virtually impossible.

Housing is the wrong approach for Crews Hill The rationale to consider the area for residential development seems to centre around the fact that there is a rail station there. However, train service at Crews Hill is currently 2 trains per hour, which is not enough to sustain high-density housing. Low-density housing will not contribute enough towards the borough's housing target to warrant the loss of Green Belt and horticulture, the garden centres and much more. Housing development at Crews Hill would be car-dependent, creating more car journeys and pollution at a time when Enfield needs to be reducing both.

A Positive Vision for Crews Hill – a centre for employment

Garden centres support 2.9% of the UK's retail workforce. The new Local Plan should include similar policies to those contained in the 2014 DMD, which would protect and improve Crews Hill, in addition to recognising the value of agriculture in general. The Council should seek to support, not displace, horticulture businesses, promote local food growing in the area, work with TfL to improve the W10 bus service for visitors, workers and local residents and crack down more consistently on inappropriate activities in the area.

C. Masterplanning key opportunity areas

The masterplanning of strategic sites is central to meeting housing needs and tackling congestion and air pollution

Masterplanning is critical to attracting developer investment, in particular for at least two major sites – Southbury and Edmonton Green.

Large sites can become new neighbourhoods with a district centre, where people can live, work, shop and go out in the evenings and where children can walk to school.

For large sites, well-planned mixed-use development - i.e. incorporating residential units, commercial space, attractive retail/shops/cafes space, as well as community facilities - is vital also to attracting new business for example to occupy new office space.

Masterplanning also ensures sub-optimal, piecemeal development is avoided. Some recent planning decisions and activities in Enfield demonstrate why taking decisions outside of a masterplanning process can lead to sub-optimal outcomes, for example:

- Permission was given to Beavertown Brewery to occupy a site which could have been developed for mixed residential and commercial use.
- Proposals are being discussed with Colosseum and Asda sites at the A10 retail park without reference to a masterplan, setting Enfield residents up for sub-optimal outcomes and compromising what could be delivered elsewhere in the area in future.
- The lease for the Edmonton Green shopping centre was sold without a masterplan which could have directed investors. The car park at Edmonton Green has permission for very low density development (48 dwelling per hectare) but it could / should have been developed at much higher density as part of a comprehensive masterplan.

Masterplanning also enables affordable housing to be incorporated in largescale developments more effectively.

Affordable housing

Enfield is dominated by relatively low density, suburban housing with car-parking. Large 'opportunity' sites with good public transport can and should be used to create an alternative i.e. large-scale high density, car-free / car-lite developments which are affordable for young people / people on lower incomes who are also more likely to rely on public transport and are less able to afford a car. Low-density, car-dependent development in Green Belt will not meet these needs.

Given that the current build rate is much lower than required (average of 500 to 600 per year vs need for 2,400 per year), a sensible approach would be to focus the council's limited capacity on bringing forward specific large sites which can deliver large numbers of homes *including* affordable homes, relatively quickly.

Capacity within Enfield for masterplanning

Enfield and the GLA must work together to ensure Enfield has adequate capacity to establish masterplans for, at a minimum, Southbury/Ponders End and Edmonton Green/Edmonton Futures Housing Zone. Other areas in Enfield also need masterplans to ensure economic, social and environmental/transport issues are planned effectively. Edmonton is a particularly deprived area which deserves better. Southbury is a huge opportunity for Enfield and is a space which could host a really attractive new district centre which can transform the area for all Enfield residents.

Southbury / Ponders End – 17,500 new homes

Our key proposal is that the council moves urgently to masterplan major development at and around Southbury Station including a new district centre away from the Great Cambridge Road and community facilities, employment space, shops and restaurants. This should include the following sites:

	SOUTHBURY AREA	Hectares		Units
1	Enfield Retail Park / Colosseum Retail Park 14.84ha. The Colosseum part is 4.5ha (all undesignated) 400dph	14.84	Develop for mixed use	5936
2	South of Southbury Road inc Morrisons (undesignated) 300dph (higher than Camden comparator because location could cope with massing	5.73	Develop for mixed use	1719
3	Asda section of Great Cambridge Road and Martinbridge Trading Estate (GCRMTE) Part A (SIL) 360dph	6.39	Change use to mixed	2300
4	Section of GCRMTE Part A which could be mixed-use north of Southbury Road / east of the Colosseum and Enfield retail parks and South of Crow Road (SIL) 360dph	10.50	Change use to mixed	3780
5	Remainder of GCRMTE Part A should remain as SIL but intensified (SIL)	16.50	Intensify SIL	0
6	GCRMTE Part B – should remain as SIL but intensified (SIL)	17.20	Intensify SIL	0
7	The Southbury Leisure Centre car park excluding leisure centre and school 1.68ha. Could build over parking. Step down height so estimate 100dph. School could be moved to less polluted site enabling development of that section too.	1.68	Develop mixed use	168
8	Tesco Extra on Southbury Road - 1.83ha =216dph. Could build over parking.	1.83	Develop mixed use	396

9	Queensway sites 3.24 - very close to Southbury. Should be part of the masterplan. Could go high but maybe stepping down from top density. Estimate 300dph = (LSIS)	3.24	Change use to mixed	972
TOTAL = 15271				
	PONDERS END AREA			
1	Redburn Industrial / Meridian Business Parks (SIL) should be considered for mixed use because of their location. Some should be retained for SIL rather than mixed-use. 18.3ha could generate 5,500 homes at 300dph. Estimate roughly half that		Change to mixed use	2500
2	South Brimsdown (Ponders End Industrial Park) - no figure is included because it has been permitted for the Beavertown Brewery. However, there maybe opportunity in the future to allocate some of the Southern end of Brimsdown for mixed use		?	-
TOTAL = 17771				

Southbury / Ponders End opportunity area

(See more detailed issues and ideas for a Southbury masterplan at Annex 4)

Southbury should be designated a Mayoral Housing Zone with the Upper Lea Valley Opportunity Area extended to encompass it. Enfield should establish capacity and work with the GLA to create a Masterplan for the Southbury area incorporating the areas proposed above, as soon as possible, and should avoid piecemeal development in the area. The Colosseum Park development should not go ahead unless and until the masterplan is in place – though clearly this is a huge opportunity for early gains so masterplanners should work with the developers to ensure it is ready to go once the masterplan is ready.

Ponders End should also be designated a Mayoral Housing Zone and/or Opportunity Area, and connected to the Southbury Area Masterplan, so that services, amenities, etc are planned in tandem, given the proximity of the areas. The area around Ponders End Station has huge potential to deliver housing in mixed-used developments at the southern end of the Brimsdown Estate and on the Redburn and Meridian estates.

Key opportunity: Edmonton Futures / Edmonton Green – 10,000 new homes?

A masterplan should be created for both Edmonton Green and the Edmonton Futures Housing Zone. There is vast potential here but it is impossible to say how many homes could be created because of the lack of clarity over what regeneration of these areas might entail.

Edmonton Green is very close to transport, can support travel to work in the City of London (where office space is expanding dramatically) and can and should be considered for high density development for example like that in the new Tottenham stadium area but with height restrictions. The largest site at 0.9ha is the Asda at Edmonton Green. It needs to be part of a masterplan for the whole shopping centre (8.4ha). This does not appear to be happening. 82 units in 9 storeys are already planned in the Monmouth Road, North Mall car park, which is 1.7ha i.e. very low density of 48dph. With such good public transport, the entire site should be able to handle at least 3,000 homes.

Edmonton Futures is a wider area which includes estate regeneration schemes already due to deliver 2000+ additional homes.

Edmonton Green / Edmonton Futures Mayoral Housing Zone opportunity area

The Edmonton Futures Mayoral Housing Zone should be extended to incorporate Edmonton Green and these areas should be masterplanned in tandem with support from GLA. This is a particularly deprived part of the borough which suffered from the riots but missed out on regeneration like that in White Hart Lane. The area is in desperate need of a masterplan and there is huge potential to transform the area for existing residents and to attract new business. The Eastern Enfield Group of The Enfield Society has worked to establish ideas for a masterplan (see Annex 1) and would be able and willing to help continue this work.

D. Transport – improvements to rail network and high density, car-free development

Car free development can protect existing residents from additional congestion and air pollution but also provides a more affordable alternative to the dominant housing type in Enfield (suburban / relatively low-density with car parking)

To support the Mayor’s Transport Strategy, Enfield will need to seek to reduce the total trips made by car and must avoid adding in new trips and so will need to enable car-free / car-lite development and avoid new car-dependent development.

Land can be built to higher density where there is effective public transport (both for homes as well as the necessary community infrastructure and commercial and industrial space) so better use can be made of available land by focussing on improving transport in strategic locations.

While protecting existing residents from the potential rise in traffic usually associated with major development, high-density car-free homes will provide a more affordable alternative to the dominant suburban housing type in Enfield.

Car-free development as a starting point

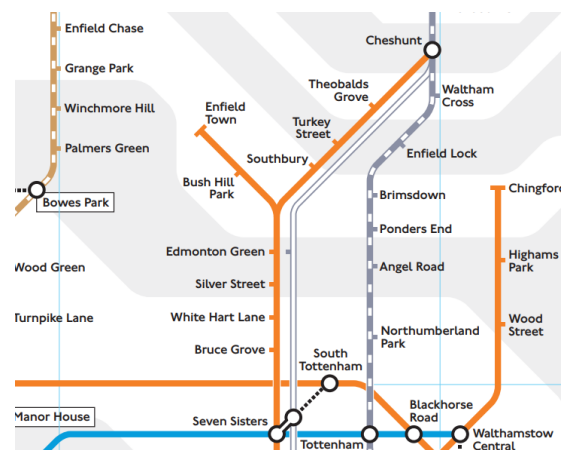
The starting point for all development in Enfield should that it is car-free. This can be achieved because most major sites have good enough public transport or improvements can be planned.

Masterplanning new homes alongside transport i.e. improving transport in strategic places – is a major opportunity for Enfield because it is achievable and affordable

Master-planning: transport improvements can unlock sites in Enfield. But at the same time opportunities are being missed where transport is already good: master planning can also avoid this continuing in future and ensure opportunities are taken not missed.

London Overground to Cheshunt/Enfield Town

Currently there are only 2 trains per hour north of Edmonton Green on the Cheshunt branch, though more



on the Enfield Town Branch. TfL are proposing now to increase trains to Enfield Town however there was an option in the original consultation to increase trains on the Southbury branch to 3-4 trains per hour. This would be transformational for the areas around the stations on this branch, most notably the Southbury station area. The Eastern Enfield Group of The Enfield Society has analysed existing rail services and has made recommendations for practical improvements (see Annex 2). A summary follows:

East branch – stations at Southbury/Turkey St/new station Carterhatch Lane

- Major opportunity at **Southbury** which needs to be central to the LP but currently is not. This would involve increasing trains on the Southbury line
- This would also unlock the **Turkey Street** station area where there is potential for regeneration schemes on low density estates (these would be additional to the sites we have identified in our survey)
- A new station stop at **Carterhatch Lane** (between Southbury and Turkey St) would unlock potential for regeneration on nearby estates and the Hertford Road area (again these would be additional to the sites in our survey)

West branch – stations at Bush Hill Park/Enfield Town

- Unlock **Enfield Town** and the significant site adjacent to station

South of Edmonton Green: Silver St / Edmonton Green (already 4 trains per hour)

- **Edmonton Green** – opportunity here is being missed. There is already good transport but, for example, development is being permitted at very low density and without an area masterplan

West Anglia main Line from Liverpool St

The proposed upgrades to this line have, lamentably, not materialised, compromising delivery at Meridian Water and beyond. There were proposals to four track this line as far as Brimsdown (beyond which it becomes more complex because of a level crossing) which would create opportunities for high density at Angel Road, a new station at Pickett's Lock, Ponders End and Brimsdown. The Eastern Enfield Group of The Enfield Society has analysed existing rail services and has made recommendations for practical improvements (Annex 3).

A summary follows:

- **Angel Road** unlocks Meridian Water sites but also some sites north of the station.
- **Ponders End** – opportunities being missed here: a major site suitable for mixed use (the Ponders End Industrial Estate which is a south facing site with good transport links on the south east of the very large Brimsdown industrial area) is now proposed to be with Beavertown Brewery. A masterplan for sites surrounding Ponders End is critical to avoid missing further major opportunities.
- A new station at **Pickett's Lock** could unlock development there. In 1995, Enfield Council commissioned a study by the Peter Davidson Consultancy in conjunction with the masterplanning exercise for Picketts Lock which considered the business case for a new railway station on the existing line. This should be revisited.
- **Brimsgdown** station can unlock some of the SIL for mixed-use.

Improvements to London Overground and rail services

London Overground to Enfield Town / Cheshunt

TfL should increase trains on the Southbury Loop north of Edmonton Green to 4 trains per hour at peak. Both the Southbury Loop and the Enfield Town branch should be upgraded to 3 trains per hour off peak and at weekends. That would allow a clockwork timetable of 6 trains per hour from Edmonton Green to Liverpool Street. There is a strong business case for the Southbury option, which would also unlock development at Turkey St.

Ultimately, a new station should be planned between Southbury and Turkey Street at Carterhatch Lane, to open that area up.

West Anglia Line

Enfield should work with other affected boroughs, as well as TfL and the GLA, to reinstate the plan to quad track the West Anglia line from Stratford to Brimsdown as a priority. This would facilitate up to 8 trains per hour with some platform work at Stratford.

Quad-tracking is also the stimulus for a new station at Pickett's Lock, which could also be a Crossrail 2 station, serving new housing west of the tracks. The Upper Lee Valley OAPF envisages walking and cycling bridges over the railway at Goodwin and Charlton Roads. The 1995 business case for a new station at Pickett's Lock should be updated to deliver the new station between the two bridges.

E. Space to Build in Enfield – survey results

Enfield RoadWatch, CPRE London and The Enfield Society have conducted a detailed survey of the entire Borough of Enfield ward by ward, to establish a list of sites which could provide space to build. This was a TWO STAGE PROCESS:

STAGE 1 involved identifying sites which currently make poor use of space and which could be intensified and put to better use. These ranged from some very large sites to hundreds of 'micro' sites. A document has been created for each of the 21 wards in Enfield which lists and provides images of each and every site. The sites are also listed in a spreadsheet and categorised according to size and type to allow for analysis.

STAGE 2 involved identifying which of these sites would be appropriate for development in the timeframe of the Local Plan: we recognise that not all the sites identified can be developed during the timeframe of the Local Plan. At this stage, we also estimated the number of new residential units which could be accommodated on these sites.

STAGE 3 (a) involved identifying sites we felt we could not include in the Stage 2 list BUT which could also deliver thousands of additional new homes

STAGE 3 (b) involved identifying sites which could be used for retaining, improving and increasing space for employment

STAGE 1 RESULTS - Number of sites, their size and type

In researching *Space to Build in Enfield* we have looked for spaces which could be better used i.e. built higher using air space. These include surface car parks, low density / low-rise retail or industrial spaces, garages and other low-rise buildings in areas where it would be appropriate to increase height.

We assume that surface car parking is a poor use of space which could be better deployed either by incorporating parking within a development (for example building over car parking space), moving parking to a site nearby to free up a site for development or, where appropriate, eliminating parking.

The research found a total of 510 sites identified as making poor use of space ranging in size as shown in figure 1.

Figure 1: Number of sites of different sizes identified as making poor use of space.

	Large site (anything over 1.0h)	Medium site 0.26 – 1h	Small but significant site (0.1 to 0.25h)	Micro site (less than 0.1h)	TOTAL
Number of sites	30	30	140	310	510
Total hectares	431	13	21	15	480ha

The sites ranged in type as shown in Figure 2.

Figure 2: Number of sites of different types identified as making poor use of space

	Low rise industrial / retail	Supermarket (some with surface car park)	Surface carparking	Garages	Yard / commercial site	Low rise – storey could be added	Other
Number of sites	23	13	152	166	39	36	83
Total hectares	412	18	15	13	4	3	16

STAGE 2 results – sites which could be developed in the timeframe of the Local Plan

We did not assume that all the sites identified as making poor use of space would in fact be developable in the timeframe of the Local Plan. So, at Stage 2 of the research, we identified a number of specific large sites which could be brought forward and deliver largescale mixed-use residential and commercial development.

In considering which large sites to include, we looked at Public Transport Accessibility Levels and also potential to improve transport as part of a masterplan. Many of the larger sites we have included are focussed around the areas discussed elsewhere in this report as being appropriate for masterplanning. Related transport issues are also addressed elsewhere.

In terms of small sites, we assume that only around 30% of the small, medium and micro sites identified at Stage 1 might ultimately be developed.

We assert that these small and large sites are developable and provide a much more sustainable alternative to building on Green Belt.

Number of homes which can be accommodated on Stage 2 sites. We have naturally needed to make assumptions about the number of dwellings per hectare (dph) for sites and have, as far as possible, indicated the reason for the assumptions.

- Assumptions have been made about possible dph based on similar examples or, in the case of the Southbury retail areas, the Colosseum Retail Park prospectus, which proposes up to 1,800 homes on 4.5ha i.e. 400dph.
- For supermarket sites, the Morrisons at Chalk Farm Road, Camden has been used as a model, where a supermarket and 700 homes were sited on 3.24ha i.e. 216dph. This has been applied to supermarket sites except Morrisons and Sainsburys at Southbury because these latter can be part of major high density developments. Other sites closer to residential and/or low-rise areas have been estimated at lower dph targets, as shown.

The table below lists the major previously developed sites in Enfield which we believe present an opportunity to repurpose as mixed use or for residential development.

Figure 3 – sites in Enfield which currently make poor use of space and which could be repurposed as mixed use or used for residential development within the time frame of the Local Plan

Enfield’s supermarket sites. A good comparator is Morrisons at Camden Goods Yard, a 3.24ha site with 700 flats. We have used this density [216dph] assumption for most of Enfield supermarket sites except where indicated	
Southbury site 2 Morrisons site at Southbury is 5.73ha. A slightly lower density is proposed than for the Colosseum site across the road because retail / commercial space will need to be accommodated. Assume 300dph	1719
Southbury site 8 Tesco Extra on Southbury Road - 1.83ha @216dph	396
Tesco/ Royal Mail at Enfield Town Station - 1.55ha @216dph	335
Asda, Chase Side - 1.34ha @216dph	290
Sainsburys, Green Lane - 2.3ha @216dph	497
Lidl, Unity Road [too residential for high rise] - 0.71 = 216dph	153
Morrisons, Palmers Green. Step down dph slightly. 1.87ha @ 166dph	310
Other large sites – proposed for mixed-use development	
Southbury site 1 Enfield Retail Park / Colosseum Retail Park 14.84ha. The Colosseum part is 4.5ha (all undesignated)	5936
Southbury site 7 The Southbury Leisure Centre car park excluding the leisure centre and the school is 1.68ha. It would need to be stepping down in height so estimate 100dph.	168
Total for known estate regeneration schemes – Alma, Joyce Avenue/ Snells Park, New Avenue, Ladderswood	3384
Other known major/minor developments i.e. Meridian Water, Chase Farm, Trent Park	10762
Cockfosters station, 1ha assume 100dph	100
Abra Wholesale, Picketts Lock. Some housing adjacent. Fairly isolated at present so assume 2.5ha @ 100dph assuming new station at Picketts Lock.	250
Industrial sites. NOTE The London Plan allows for consideration of industrial sites for change to mixed-use / intensification. The approach we propose is to change some of Enfield’s SIL to mixed-use, retaining at least as much commercial/industrial (C&I) space but adding in residential too. We also propose a number of low-density / poorly-used C&I sites elsewhere are intensified so overall more C&I space is created (more of which below).	
Southbury site 3 ASDA on Southbury Road (6.59ha @ 360dph) (SIL)	2372
Southbury site 4 Section of GCRMTE Part A which could be mixed-use (north of	3780

Southbury Road / east of the Colosseum and Enfield retail parks and south of Crown Road 10.5ha (SIL) 360dph	
Claverings (Draft Local Plan suggests mixed on this site) 3.87ha. Without a new Picketts Lock Station, it is suburban so est 120dph = 464 (could be planned with spaces as per Bexley so car parking can eventually be replaced with residential blocks once PTALs rise)	464
Alma Road estate 4.8ha also mentioned in Local Plan. Only PTAL2	576
Regent's Ave estate at the corner of the N. Circular and Green Lanes, next to Palmers Green bus garage. Regent's Ave is urban but small. 0.59ha @200dph	118
Montagu Industrial Area South B is adjacent to Meridian and in the Edmonton Futures zone, so that area makes sense for mixed-use development. The Meridian densities was originally 220dph, so using that. 1.87ha @ 220 =	411
Southbury site 9 Queensway sites 3.24 - very close to Southbury. Should be part of the masterplan. Could go high but maybe stepping down from top density. Estimate 300dph	972
Ponders End Site 1 Redburn Industrial and Meridian Business Parks (SIL) should be considered for mixed use because of their location. Some should be retained as SIL . 18.3ha could generate 5,500 homes at 300dph. Estimate roughly half that.	2500
MEDIUM SITES (the larger of the small sites we identified)	
175 Bowes Road - .5 mile to Arnos Grove tube. 180 homes @ 216dph	180
Lidl at Silver Street. Low rise area but only 0.4 miles to Silver Street Station. Estimating 150dph. 115 homes	115
Car park/ garages off Lodge Drive 0.2 miles to Palmers Green Stn. 70 homes at 100dph	70
Blackhorse Tower, Cockfosters - This should be developed as a CAR FREE housing development. It could provide 200+ homes, next to Cockfosters Station, also benefitting the local shops. Would require introduction of CPZ	200
Ponders End Youth Centre, South Street. Some redevelopment already happening. New school next door. Tower blocks nearby. Community facilities should be retained but additional layers could be added. 0.2 miles to Ponders End Station. 70dph = 35	35
Sainsburys, Florey Square [not included before] Could add two floors to store itself and stay in keeping with surroundings. Going by minimum space standards that could be 30 flats per floor, but there would be light and single-aspect issues. Just estimating 32.	32
M&S, Winchmore Hill Road. A good site only 0.2 miles from the underground	36
Oakwood Station car park. Not yet on TfL list but may get there. The front is listed, so nothing can be seen towering over the station. Maybe a row of townhouses facing Prince George Avenue? 6 could be fitted in or a 2-storey block of 12 units instead.	12
Arnos Grove car park. On TfL list. It could take higher block/s of flats. 200dph. = 80	80
Other medium, small and micro sites	
According to our research, other medium, small and micros sites (we have located more than 400 in Enfield), amount to 39.76ha in size. Assume these can only take infill @ 100dph and only 30% of them are developed	1193
TOTAL	37446

The total new homes possible within the areas of Previously Developed Land we have so far analysed is **37,446**.

A proactive approach to promoting appropriate sites for development, especially mixed-use development

There are many sites which could be developed to make better use of space in Enfield, for example supermarket sites with surface car parking and poorly-used industrial or commercial sites in need of regeneration. ***We have listed the sites we believe are appropriate for mixed-use or residential development. Along with smaller sites, these***

could accommodate upwards of 37,000 new homes at a conservative estimate, according to our survey.

Enfield should create a policy designed to proactively promote the development of the larger sites listed above. The policy could state that the borough will engage with owners and developers who wish to consider development of their site and that the borough would encourage pre-application discussions to establish parameters for a particular site. Enfield could create a panel of developers and architects to assist with this process.

Small and ‘micro’ sites

Our survey shows that there are a large number of small (0.1 to 0.25ha) and ‘micro’ (under 0.1ha) sites which, collectively, could create a lot of space to build. Including some of the smaller ‘medium’ (0.25 – 1ha) sites we identified, combined these sites total nearly 40 hectares.

Enfield should create a policy designed to proactively promote development of these infill sites and issue guidance to ensure it is appropriate and sympathetic given that many of these sites will be close to people’s homes.

There should be a presumption in favour of development of ‘infill’ sites defined as sites under 0.25h providing proposals accord with guidance and – for the larger of the small sites – providing pre-application discussions are held to ensure appropriate applications are submitted.

Enfield could create a panel of architects to set out examples of appropriate small-scale development and more generally assist owners / developers of small sites to submit appropriate planning applications.

STAGE 3 (a) Sites we have not included BUT which could deliver thousands of new homes additional to those on the sites we have identified above

By no means are all sites in Enfield which *could be* developed included in our list. There are important areas / sites which we have not included because it is less clear how development might be approached at this stage. However at least one of these – Edmonton Green – could deliver largescale residential development. This is discussed earlier in the paper. The reason for not including these is simply that it is not clear how the sites are likely to be developed so it is very difficult to judge numbers.

Some sites (or parts thereof) are already listed elsewhere as being appropriate for development. In Brimsdown, for example, a section at the lower end is listed in Upper Lee Valley Area Action Plan as being appropriate for mixed use. Enfield Town is part of a masterplan. And Edmonton Green / Futures are the subject of various planning documents though these do not present detailed proposals for new housing numbers.

Important sites not included	Potential for new housing
Edmonton Green / Edmonton Futures	?
Enfield Town	?
Brimsdown – southern end (SIL)	?
Estate regeneration at Turkey Street	?
Estate regeneration at Carterhatch Lane	?

Additional important sites

We have by no means listed all opportunities for space to build in Enfield. We have not, for example, listed Edmonton Town/Futures or Brimsdown, though these have already been identified as areas appropriate for residential or mixed-use development.

Our survey demonstrates that there are opportunity sites, like those listed above, which could and should be subject to detailed masterplans in future once the key Southbury / Ponders End and Edmonton Green / Futures areas have been planned. These include Brimsdown, but also sites at Carterhatch Lane and Turkey Street.

STAGE 3 (b) Retaining, improving and increasing space for employment

Parts of Enfield's SIL is host to businesses which are not listed as appropriate for SIL (see Annex 5 for more detail): for example, the trampoline park, MacDonalds restaurant, retail outlets etc. This creates an opportunity to relocate and / or redesignate some employment land designations so overall it makes more sense.

At the same time, retail could and should be redirected to town centres so that genuine SIL uses are encouraged and (genuine) SIL space increased.

Additionally, many industrial sites in Enfield, some SIL (Strategic Industrial Land) and some designated as LSIS (Local Strategic Industrial Site) could be intensified to increase the total commercial and industrial space. The London Plan gives examples of this type of intensification.

We have proposed that some SIL in Enfield is changed to mixed-use. This should mean retaining the same amount of commercial space but adding in residential, by increasing the height of the development, so no SIL should in fact be lost. Nonetheless, there should be a policy to increase the available SIL in the borough by intensifying the sites which are inappropriate for mixed-use development. These sites are listed here. Some are extremely low-density like Freezy Water and Innova and could be much better used. Road transport is an issue at the latter sites and Enfield should lobby for the M25 junction improvement which enables a dedicated left-hand turn from the A10 at Junction 25. Buses could be improved by extending the LV1 bus.

SIL and LSIS which could be intensified to increase employment space in the Borough
Brimsdown SIL – much of this is not being used for industrial use but has retail and even drive through McDonalds – so could be intensified and used more effectively
Montagu North from Gibbs Road SIL
Eley Estate SIL
Aztec 406 SIL
Freezywater Industrial Park SIL
Innova Business Park SIL
GCRMTA Part A north of Crown Road SIL
GCRMTA Part B SIL
Commercial Road and North Middlesex Industrial Estate LSIS
Langhedge Lane Industrial Estate LSIS

Intensifying industrial estates

Enfield should create a policy to increase the available SIL in the borough by intensifying the industrial sites which are *not* appropriate for mixed-use development. Some are extremely low-density like Freezy Water and Innova and could be much better used. This would require some transport improvement e.g. LV1 bus extension and the road improvements previously planned (as below). Areas in the Brimsdown estate, for example, are poorly used and in fact contain retail which would be better placed in town centres.

A separate masterplan should be created for all the SIL, LSIS and employment land in the borough to increase the overall employment space and to optimise the locations of different types e.g. to ensure retail is focused on town centres; so modern office space could be created at a new town centre at Southbury, etc. This should easily be able to demonstrate no loss of employment if some SIL is released. As long as jobs are re-provided at the same or higher number elsewhere, which we believe can be done without difficulty, this can justify the change to mixed-use of some of the borough's SIL.

Road improvement at M25 junction 25

Enfield should also lobby for a change to the proposed works at junction 25 to ensure a dedicated left-hand turn lane from the A10 north onto the M25 is included (originally proposed as an option – and justified because of the significant economic benefits this relatively simple change would make). Works are not scheduled to start until 2020.

F. Next steps

The proposals in this report (in shaded boxes throughout) will form the basis of our responses to the Enfield Local Plan consultation. We will also promote the proposals and continue to seek a genuinely sustainable future for Enfield.

ANNEX 1 - Edmonton Green Masterplan issues and ideas (these were compiled by the Eastern Enfield Group of The Enfield Society)

- Masterplanning: The existing shopping centre is inwards-looking and there are opportunities to Masterplan the site to re-connect it with adjoining residential areas to create a more legible and walkable space with a greater sense of place. Opportunities for this to the south will be made more interesting by the site adjoining the Edmonton Futures Mayoral Housing Zone and hopefully there can be a joint Masterplanning exercise of a similar quality to the one produced previously for Meridian Water.
- Salmons Brook: This river is culverted through the site. Revealing it would allow a green wedge through the shopping area, which would provide a splendid natural feature and wildlife, much like what has been achieved in the extension to the High Street at Hemel Hempstead. This could provide a real structure and a breath of life to the site with walking and cycling routes along the river
https://c1.staticflickr.com/5/4439/37328755361_c904e3a239_b.jpg
- Historic Edmonton: The Enfield Society holds photos of Edmonton Green as it once was and members are available to give you presentations about the history of the area. It is hoped that these are used as inspiration for the high-street frontage and Hertford Road / Fore Street environs.
- Railway arches: While conversion of the railway arches adjacent to the rail station into retail may be impossible because of the embankments within the arches, the shops that used be in front of the arches could be re-instated to re-frame and activate the area while the Green in front could be enhanced and made available for an occasional market, such as a monthly farmers market for example. This would create an exciting entry to Edmonton Green that would complement the main shopping centre. Edmonton Green would benefit from a market similar to the one at Tottenham Green.
- Church Street Conservation Area: It is hoped that S.106 money can be provided as part of a wider shopping centre redevelopment to enhance the Church Street Conservation Area. In particular, there is a Georgian Girls School that is presently vacant and on Historic England's At Risk Register, with risk of collapse.
<https://historicengland.org.uk/advice/heritage-at-risk/search-register/list-entry/50040>
- It is hoped that a masterplan for Edmonton Green could include provision for a Townscape Heritage scheme for Church Street Conservation Area to enhance shop fronts, signage, dilapidated listed buildings and other buildings that have been inappropriately altered in the past.
- Rail / Bus interchange: It is unfortunate that the railway station no longer has a southbound bus stop. The one in front of the leisure centre was removed after 2004 when articulated buses were introduced, but these are no longer used so a southbound bus stop could be re-introduced. With minimal investment the loading bay here could be converted into a bus stop. The existing corresponding northbound bus stop at the rail station is heavily used. This could be re-thought as part of a major redevelopment.
- Rail opportunities: TfL have produced draft timetables and business plans for an additional 2 trains per hour at peak and off peak. They have not yet committed to these upgrades but the Council hopefully can work with TfL to bring them to fruition. The best option presented is for 2 additional trains per hour to Cheshunt during the peak. This would double services on the branch, raising them from 2 to 4 trains per hour. Enfield Town already has 4 trains per hour at peak. The best off-peak and weekend option is for

1 additional train per hour from Enfield Town and Cheshunt to Liverpool Street. This would provide a 50% service boost, with each branch rising from 2 trains per hour with half hourly service to 3 trains per hour with 20 minute frequency throughout evenings and weekends. This would also create a clockwork 6 trains per hour from Edmonton Green to Liverpool Street through Tottenham.

- Boosting the peak service from Cheshunt will be transformative for Edmonton Green because residents north of Edmonton Green will have much more frequent service to the shopping centre. Also the increasingly affluent residents of Tottenham would have a train to the shopping centre every 10 minutes instead of every 15 minutes.
- For the draft timetables and business plans for these vital proposed upgrades, please follow this link:
<https://www.dropbox.com/sh/sw2xbdjqbagc3or/AACQEOTZeo9yUfPTCkrIIIVaya?dl=0>
- Bus Station issues: The bus station works very well for northbound buses, but more than half of the southbound buses stop on Hertford Road, outside the bus station. This provides a poor environment for interchange, gives shoppers limited cover from the elements and limited space to walk at peak times when the area becomes overcrowded. Widening the bus station concourse would allow a few extra stops adjacent to the bus stop office and the entrance and exit for southbound buses could be amended to route all buses into the bus station.
- Buses north of Edmonton Green: A significant number of buses terminate at Edmonton Green so services are much better south of the shopping centre than to the north. However, the catchment for the shopping centre by bus is primarily to the north. The situation has worsened over time with twice as much overcrowding on buses north of Edmonton Green than south of it. This situation can be remedied and should be included in a masterplan.
- Congestion on Hertford Road could be alleviated by extending the 144 and 149 to Ponders End and the 259 to Enfield Highway.
- With these bus route extensions, the existing 349 bus has no obvious role. It could however be given a new lease of life, to protect capacity in Tottenham, by diverting off Hertford Road to run via Nightingale Road and Ponders End Station to boost frequencies on these poorly served but heavily populated roads that form a large catchment for the shopping centre but at present has poor links to it. The 349 should also be extended from Stamford Hill in the south to Clapton or Hackney Downs to plug a missing link between Edmonton, Tottenham and Hackney.
- There is also a need for a direct link between Edmonton Green and Enfield Retail Park because thousands of new homes are planned there, so it should have a direct bus link to Edmonton Green Shopping Centre. This could be achieved by extending the 349 or 144 into the retail park or by diverting the 191 along Crown Road.
- The W8 is planned to extend to Meridian Water, which will be great. As a result, the W6 is planned to be extended to the Lee Valley Leisure Centre, but it should not stop there. The W6 could extend from the Lee Valley Leisure Centre to Chingford. This would provide a desperately needed direct and fast link from Chingford to Edmonton Green Shopping Centre, opening it up to an affluent residential area with high disposable income.

ANNEX 2 – Analysis and Recommendations for London Overground service to Cheshunt and Enfield Town (compiled by the Eastern Enfield Group of The Enfield Society, who can provide additional information on request)

- Currently there are only 2 trains per hour (tph) north of Edmonton Green on the Southbury Loop for Cheshunt. The Enfield Town branch benefits from 4 tph at peak times but both branches languish at a rural 2 tph during the off peak and at weekends.
- TfL's preferred option for additional future services is for two additional peak and off-peak services to Enfield Town. This is for operational reasons only because Enfield Town is a shorter branch with a three-platform terminus. Future enhancement should however focus on the proposals that best support regeneration.
- This proposal would miss the opportunity to boost the Southbury Loop to TfL's minimum 'turn up and go' standard of 4 trains per hour. It would also result in a sporadic service due to imbalance between the branches, failing to provide turn up and go benefits to the majority of passengers including at Edmonton Green, which has more passengers than the entire Enfield Town branch.
- TfL's own business case analysis favours the additional peak services being allocated to the Southbury Branch to bring it to 4 tph to equalise it with the Enfield Town Branch.
- TfL's business case analysis also shows that return on investment would be vastly higher if the off-peak boost is 1 train per hour for both branches, raising them both by 50% to 3tph with 20 minutes between services. This would result in a clockwork metro service of 6tph with 10 minutes between services between Edmonton Green and Liverpool Street, boosting regeneration potential throughout northeast London.
- There should be no operational barrier to delivering 4 trains per hour to the Southbury Loop despite Cheshunt providing a single platform terminus. There is space at Cheshunt to construct a Platform 4 adjacent to the existing station carpark to provide a two-platform terminus to facilitate a more robust service.
- Existing trains could be brought into service and re-timetabled to provide the enhanced service, which would act as a catalyst for residential and business development in the area.

Recommendations:

- The preferred option is 4 trains per hour at peak and 3 trains per hour during the off peak and at weekends for both the Enfield Town Branch and Southbury Loop which could stimulate substantial housing development in Edmonton and North East Enfield.
- The proposed 8 trains per hour peak and 6 trains per hour off peak service would stimulate regeneration in Edmonton Green and Edmonton Heartlands. This proposal also affects capacity in Hackney and Broxbourne so Enfield should work with the other affected Councils to encourage TfL and Network Rail to deliver these proposals.
- Reinstatement of the station at **Carterhatch Lane** for Enfield Highway and Forty Hill would unlock substantial potential for regeneration on adjacent estates and at the district centre of Enfield Highway. This would also substantially reduce road traffic on the congested Hertford Road between Enfield Highway and Edmonton Green and the station would have convenient interchange with arterial bus routes. Carterhatch Lane Station is the only station on this route that was not re-opened when the branch was re-opened for passengers in the 1960s.

ANNEX 3 – Recommendations for a new Picketts Lock Station (provided by the Eastern Enfield Group of The Enfield Society, who can provide more information on request)

- A new station at Pickett’s Lock would fill a gap that is double the distance of any other stretch between Crossrail 2 stations in London. Broxbourne Council is already lobbying for a new station at Turnford on this line to unlock major new housing development there.
- A station here could unlock substantial development and estate renewal in existing residential and industrial sites including the Council estate at Bounces Road, Claverings Industrial Estate and sites east of the track around Picketts Lock Lane, also making development to the north of Meridian Water more viable. These areas have some of the lowest possible PTAL levels at present.
- A station at Picketts Lock would also provide the more than 60,000 residents of the N9 postcode access to services to Stratford and potentially Crossrail 2.
- In 1995, Enfield Council commissioned a study by the Peter Davidson Consultancy to consider the business case of a new railway station for Picketts Lock in conjunction with a masterplanning exercise that proposed options including an artificial ski slope and a 42,000 seat stadium at the existing athletics centre. Ambitions at this site appear to be moving towards fruition now with The Wave proposing to invest £40m in an artificial surfing lake just east of the potential sports stadium location.
- The station was not viable at that time of the 1995 study, because the existing mainline does not have spare capacity for a high frequency service. In light of the potential for up to 8 trains per hour on a classic quad track alignment to Stratford and other possible enhancements from Crossrail 2, that study should now be re-visited.
- The assessment should consider a station in-between the walking and cycling bridges at Goodwin and Charlton Road, as proposed in pages 144-147 of the Upper Lea Valley Opportunity Area Planning Framework “Opening Up the Lea Valley”.

ANNEX 4 - Southbury Masterplan – issues and ideas (provided by the Eastern Enfield Group of The Enfield Society, who can provide more information on request)

There is potential to reconsider existing retail provision at Southbury in connection with Enfield Town, Edmonton Green and other district and local centres.

- Strategic re-allocation of existing warehouse retail could invigorate existing town and district centres, reducing reliance on car-dependent, out-of-town shopping and facilitate higher residential densities in Southbury.
- A sequential test should be applied to any new retail to ensure that retailers such as Next, who recently moved to Southbury, consider locations like Enfield Town and Edmonton Green first.
- If retail is to be retained, it could be concentrated around a new town centre near to Southbury Station including a closer look at Enfield Bus Garage and the Tesco's car park to ensure that retail is located near public transportation.

Decisions should be made within a wider masterplan that considers the entire brownfield area, with regards to future sites for schools, healthcare and other amenities that will be required as various sites begin to come forward. Decisions should also be made about future open spaces, parks and areas for nature and walking / cycling routes through the site to provide amenity for future residents.

A Masterplan should seek to re-connect severed elements of the site, for example:

- Extending Dearsley Road westwards to better connect Baird and Crown Road
- Provide a walking / cycling crossing of the A10 at its junction with Dearsley Road to enhance access for residents to playing fields and leisure facilities west of the A10
- Lincoln Way could be re-connected to Southbury Station and the wider Southbury area through the ASDA site
- Martinbridge Industrial Estate could be re-connected to the Southbury area with new road connections if the De Mandeville site comes forward
- Brick Lane and Broadfield Square could be re-connected to Southbury with connecting roads and walking or cycling routes to re-connect the wider Enfield Highway area to the soon-to-be-regenerated Southbury area
- There is potential for a walking / cycling bridge over the railway from Broadlands Avenue via the gap between 108 and 110 Broadlands Avenue, to connect Crown Road with the A1010 via Broadlands Close

Bus provision will likely have to be boosted. Some east to west routes could be diverted along the A10, Crown and Baird Roads to better connect the new residential areas with Enfield Town. The 349 bus could be extended into the site to create a faster direct connection from Southbury to Edmonton Green.

Annex 5 – examples of inappropriate and low-density use of SIL in Enfield

GLA guidance states that appropriate uses for SIL would be: general and light industrial uses, logistics, waste management and environmental industries (such as renewable energy generation), utilities, wholesale markets and some transport functions.

This list from an older report is similar: logistics, waste management, recycling, environmental industries including renewable energy generation, transport functions, utilities, wholesale markets and some creative industries.

Some examples of inappropriate use of SIL in Enfield are:

Brimsgate

- McDonald's, Mollison Ave in Brimsgate Industrial Estate [0.29ha]
- Matalan Discount Fashion and Homeware Retailer, Mollison Ave, Brimsgate [1.23ha]
- Dreams Enfield, bedroom furniture, Mollison Avenue, Brimsgate [1.52ha]

Southbury Retail and SIL – very low density.

- Toys-R-Us empty site in the Retail Park next to CarCraft empty site in the Great Cambridge Road SIL

Montagu North

- Large DIY retail shop and banqueting facility [0.79ha]

Great Cambridge Road Industrial Estate, off Lincoln Road

- Trampoline Park in industrial unit

Annex 6 - Upper Lee Valley bus provision

The existing Upper Lee Valley corridor has very poor bus provision. The Lee Valley Transport Study sought to address this but we understand is on hold due to TfL funding issues. Arguably new housing cannot be delivered without it. Relevant proposals from page 67 of the report were as follows:

- LV1 from Brimsdown to Tottenham Hale, via Meridian Way/Watermead Way with a frequency of 5 buses per hour
- LV2 from Tottenham Hale to Walthamstow, via Watermead Way, Angel Road, North Circular, Chingford Road and Hoe St with a frequency of 5 buses per hour
- (LV1 and LV2 could be combined into a single route and the proposed LV1 should extend to Waltham Cross via Innova Park to connect the Upper Lea Valley with Hertfordshire)
- 476 extension from Northumberland Park to Meridian Water, via Willoughby Lane. Boost from 7.5 to between 8 and 9 buses per hour.
- 377 extension from Southbury to Chingford, along Nags Head Road, Lea Valley Road, and Station Road. Boost from 2 to 3 or 4 buses per hour.
- 491: Boost from 3 to 5 buses per hour

In order to facilitate increased bus provision along the A1055 a new bus lane is required on the southbound lane, from Stonebridge Lock to Burdock Road to by-pass chronic congestion at peak times. There is also need to implement existing proposals for a northern entrance and exit to Tottenham Hale bus station to reduce running time.

There is scope for the 192 and LV1 to run 24hrs a day on Friday and Saturday nights to provide interchange with the Night Tube at Tottenham Hale.

There are further proposals to route the 444 and 34 through Meridian Water, but these require substantial road construction through the site and will occur at a later stage.

ANNEX 7 – A positive vision for Crews Hill should be created – as a centre for horticulture, which recognises the major potential for employment and the major opportunity for Enfield’s economy

The draft Local Plan should pay closer attention to the value of agriculture and horticulture in the borough and reference Enfield’s long-standing and valuable farming industry. (The 2014 DMD included several policies to promote and protect agriculture and states on p121: 13.4.1)

There is a long history of agriculture and horticulture in Enfield, which has played an important role in the development of the borough. The food sector continues to be an important contributor to Enfield’s economy, with a range of small-scale producers, wholesalers and large companies generating significant income and providing many jobs. There is potential for better communication and future growth across the supply chain. This policy will help to implement the Enfield and the Mayors Food Strategies which seek to develop and maintain a thriving local food economy and promote food production in appropriate areas.

Growing food locally has become even more critical in light of environmental, economic and other challenges. The recent London Assembly report Farming in the Green Belt [December 2018] makes a convincing case for encouraging and facilitating local food growth. Among the many benefits it states: “Food produced near to its consumers has to travel less, reducing transport emissions and requiring less packaging. It enables the supply of fresher food and more fruit and vegetables, promoting a healthier diet. It also provides employment.”

Crews Hill can be developed to provide London with vegetables, plants and flowers and could again be a hub for food production in conjunction with the retail garden centres. *There are sound economic reasons for retaining horticulture in Enfield.* A recent report by Oxford Economics The Economic Impact of Ornamental Horticulture and Landscaping in the UK² found:

- We estimate that UK households spent around £7.5 billion on garden goods in 2017. This spending, made up of routine purchases of supplies and equipment for gardening, as well as “bigger ticket” items such as sheds and greenhouses, is equivalent to £1 in every £100 of household spending
- the retail sale of ornamental horticulture goods directly added around £1.9 billion to UK GDP in 2017. Over half of this was accounted for by garden centres. Additionally, the Southeast was shown to have the largest market, accounting for nearly 20% of the total spending on ornamental horticulture.
- In 2017, garden centres directly supported 84,800 jobs, 2.9% of the UK’s retail workforce.

² <https://www.oxfordeconomics.com/recent-releases/3b5ce883-cc72-4cf9-910e-be267fe93f46>

Housing is the wrong approach for Crews Hill

Instead of promoting Crews Hill for local food production and recognising its economic importance for horticultural sales, the draft Local Plan suggests replacing some/all of the garden centres with housing.

The rationale seems to centre around the fact that there is a station there. However, train service at Crews Hill is currently 2tph, which is not enough to sustain high-density housing. Low-density housing will not contribute enough towards the borough's housing target to warrant the loss of Green Belt, horticulture, the garden centres and much more. Housing development at Crews Hill would be car-dependent, creating more car journeys and pollution at a time when Enfield needs to be reducing both.

Crews Hill is already highly valued by locals and visitors, for whom it is a much-loved destination. Suggestions that it might disappear provoked the many comments on social media, including:

- “Why ruin the lovely area of Crews Hill? I spent many happy hours there with my dear mum and son. I used to spend a lot of money too. I feel sorry for the owners. Taking their livelihoods away and jobs. We must fight to keep Crews Hill open and not put housing there.”
- “OMG not another lovely place going to be lost to houses!! I sincerely hope this does not happen and that all the garden centres are safe. I love going over there and so do a lot of other people.”
- “This is the worst news ever. I have been going to Crews Hill for numerous years now. I love going there in the summer for my flowers and also a day out. I like going there at Christmas, for all the decorations and Santa. Please oh please re-think this. It's Devastating!!”

The new Local Plan should include similar policies to those contained in the 2014 DMD, which would protect and improve Crews Hill, in addition to recognising the value of agriculture in general. The Council should seek to promote local food growing in the area, work with TfL to improve the W10 bus service for visitors, workers and local residents, and crack down more consistently on inappropriate activities in the area.