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ENFIELD Council



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Place Shaping and Enterprise

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21st June 2010

Dear Sir/Madam,

Re: Haringey Core Strategy Proposed Submission (May 2010)

Thank you for consulting the London Borough of Enfield on the proposed submission stage of Haringey Council's Core Strategy. Officer level comments on the document are set out below. Haringey's Core Strategy Proposed Submission and associated LDF documents are scheduled to be considered by members of the Council's LDF Cabinet Subcommittee on 5th July 2010, following which a final response will be sent.

The Core Strategy Proposed Submission document recognises the strategic importance of the Upper Lee Valley and addresses the need for the regeneration of deprived areas in the Upper Lee Valley. It is this Council's view that regeneration and renewal proposed at Tottenham Hale Growth Area and Tottenham High Road Corridor and Northumberland Park Areas of Change will complement regeneration and redevelopment in Enfield and the Upper Lee Valley Opportunity Area as a whole.

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The recognition of the opportunity for the White Hart Lane and Northumberland Park Area to benefit from development and regeneration at Central Leaside in Enfield, including the delivery of 5,000 homes, is welcomed (pg. 29). The identification of Enfield's Strategic Growth Areas, at Central Leaside and North Circular Road, in the Core Strategy Key Diagram (pg. 55), helps to place Haringey in strategic context and shows planned change and opportunities for local communities across the boundary. Enfield Council welcomes the opportunity to work with Haringey in the planning and delivery of key infrastructure of benefit to both boroughs, and ongoing dialogue is underway through the preparation of the Meridian Water Master Plan.

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Managing Growth

Haringey Council's approach to housing growth is inconsistent throughout the document and needs further clarification. For example:

- Housing figures identified in the Core Strategy's Spatial Strategy (paragraph 2.1.2, pg. 54), SP1 – *Managing Growth* (pg. 59), SP2 – *Housing* (pg. 79) and the Community Infrastructure Study (Table: *Housing Targets and Households*, pg. 8) are inconsistent.

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- The provision of 680 homes per annum identified in SP1 – *Managing Growth* and SP2 – *Housing* would equate to 10,200 homes between 2011 – 2026, (680 per annum) rather than the figure of 6,800 homes quoted in the policy. 451
- Haringey's Spatial Strategy (paragraph 2.1.2, pg. 54) states that the borough is expected to provide approximately 11,175 homes between 2011 and 2026, which is shown in Haringey's Housing Trajectory (paragraph 3.2.7, pg. 80). However, the Community Infrastructure Study (Table: *Housing Targets and Households*, pg. 8) calculates a different housing target of 12,300 homes between 2011 and 2026. 452
- The housing supply figure of 5,137 homes at the Growth Areas of Haringey Heartlands and Tottenham Hale identified in SP1 – *Managing Growth*, together with the indicative housing figures for the Areas of Change, referred to at paragraph 2.15 of the Community Infrastructure Study (pg. 11) would provide a total of 7,867 homes over the 15 year period of the Core Strategy, representing a difference of some 3,000-4,000 homes from that specified elsewhere in the document. 455

As the detailed housing trajectory evidence base is not available to view, it is difficult to ascertain the location of the scale of development proposed and it is unclear where in the borough the housing growth envisaged is intended to be provided. As a consequence planned growth and infrastructure delivery will be affected, which will have implications for cross boundary growth and infrastructure delivery in Enfield, and other adjoining boroughs. 456

On the above basis it is considered that housing growth and infrastructure delivery in the Core Strategy Proposed Submission document is unsound and that further detail is required to determine the scale and location of planned growth in accordance with PPS12: *Local Spatial Planning*, and the implications for infrastructure delivery on Enfield.

Infrastructure Planning

It would be useful for the Community Infrastructure Study, accompanying the Core Strategy Proposed Submission document, to also present information on an area basis thereby clearly demonstrating that the spatial strategy for the borough is supported by sound infrastructure delivery planning. An area based approach would also enable coherence with Enfield's Core Strategy and infrastructure planning, where cross boundary issues are relevant. 459

Employment

Enfield Council supports Haringey's recognition that employment areas at Central Leaside could provide jobs and training for residents of the proposed new community at Meridian Water in Enfield, contributing towards creating a mixed and sustainable community (paragraph 5.1.8, pg. 114). The Council looks forward to continued working with Haringey in planning for regeneration and redevelopment at Central Leaside. 463

It is noted that policy SP8 – *Employment* safeguards Tottenham Hale and Central Leaside as Strategic Industrial Locations (SILs) in accordance with the current and Draft Replacement London Plan. With regard to those areas safeguarded as SIL (Figure 5.1 Employment Areas) at Tottenham Hale it appears that the majority of land is in fact allocated for residential led mixed use development within Haringey's Site Allocations DPD. The Core Strategy should clarify Tottenham Hale as a SIL location. 464

within both the current and Draft Replacement London Plan, and that it will in fact be retained as SIL at this location.

Transport

With regard to section 4.4 SP7 – *Transport*, as Haringey is working with regional partners including the Mayor of London, Transport for London and the boroughs of Enfield and Waltham Forest in the preparation of the Upper Lee Valley Opportunity Area Transport Study, it would be useful to refer to the study in this section. The Upper Lee Valley Opportunity Area Transport Study will address sub-regional and local level issues on the transport network, contributing to an understanding of the impact of proposed growth in the Upper Lee Valley, and providing a sound basis for transport infrastructure delivery planning in the boroughs and sub region as a whole.

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Conclusion

It is clear that both Councils share an understanding of the significant issues facing some of the more vulnerable communities within the boroughs and of the need for positive and proactive strategic planning to bring about change and regeneration. I hope the above comments serve to assist in moving your Core Strategy forward and that we can continue to work together to plan for and deliver change in north London.

Yours sincerely,



Joanne Woodward
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